Pennsylvania Gaming Control Board

WRITTEN COMMENT TO BE INCLUDED IN THE EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Kevin Joyce

Address

Telephc

Organization, if any: The Pennsylvania Restaurant Association

Employer: Kevin Joyce Restaurants DBA The Carlton

COMMENTS: (Please use second page if more space is required)

May 31, 2006

Tad Decker
Office of the Clerk
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg, PA 17106

Dear Tad:

As a follow up to my testimony in Pittsburgh, and our conversations in Harrisburg, I want to leave you with some parting thoughts. I have many different perspectives and I will attempt to make sure that I separate my personal thoughts as the owner of a The Carlton Restaurant from my perspective as President of the Pennsylvania Restaurant Association, as a representative of the Western Chapter of that association, as a member of the Governor's Travel & Tourism Advisory Commission, the Pittsburgh Downtown Partnership, the Greater Pittsburgh Convention & Visitor's Bureau, the Allegheny Conference or the Southwestern Pennsylvania Convention Center Design Commission.

As the owner of a downtown restaurant – and as a representative of the Western Chapter of the Pennsylvania Restaurant Association, it is hard to overstate the importance of keeping professional Hockey in Pittsburgh. Every home hockey game fills downtown restaurants and bars with folks having pre game dinner or cocktails. Hockey and dining fit together very nicely and the Pittsburgh Penguins 7:35PM starting time allows folks to enjoy a business dinner prior to the start of the game! We all felt the enormous negative impact during the year the NHL did not play and would hate to see that situation permanent.

As the former leader of Citizens for a Positive Future – the private group was formed to secure the public funding of PNC Park, Heinz Field and the David Lawrence Convention Center, I witnessed first hand the deep divisions that were caused in this region with the discussion of any publicly financed facility. The Pittsburgh Penguins are a major part of the fabric of our community. To have an opportunity to secure the Penguins future and have a new facility for concerts and other events without a penny of tax dollars is an opportunity that this struggling region simply cannot pass up! Any plan that involves public dollars will further divide our citizens while taking a very real risk of losing our hockey team – a major Travel & Tourism generator in this region.

As the President of the Pennsylvania Restaurant Association and a representative of the Western Chapter I also spoke about my industry's very real fear of the adverse impact of gaming. We mentioned that many areas that have opened casinos have seen major decreases in restaurant traffic and asked that your Board provide a mechanism for "doing it right" in Pennsylvania. Limiting the square footage for foodservice, not allowing complimentary food & beverage as an enticement to gamble and ensuring that products were "market priced" and not "loss leader" priced would all be great places to start! Having local restaurateurs involved in the food service would be "icing on the cake."

Since my comments before your Board, I was approached by both Don Barden's group as well as the Isle of Capri to meet to further discuss their plans for Food and Beverage Service inside their casinos. I appreciated the fact that both groups took our testimony seriously and initiated the meetings. Don Barden proposes to offer local restaurateurs the opportunity to have venues inside their casino. Despite the fact that Majestic operates many restaurants in their other venues – they have offered to do only the "buffet" in house and have suggested that the other venues could be a mix of local operators. They responded to comments concerning too much food service in their plans by promising to phase in some of their foodservice. They claim to have a great desire to see each venue successful and do not want to overload the casino with operations that are each just moderately busy. They have promised to operate their buffet at Market Prices. They genuinely seem interested in working closely with existing venues for cross promotion and noted that the increased downtown hotel occupancy with gaming will help all existing businesses. It is hard to review Majestic's plans without being impressed. The Riverfront architecture is a perfect compliment to the Rafael Vinoly designed Convention Center up the river and Don Barden and his folks exhibited a serious intent to become real community partners.

The meeting with Isle of Capri was also informative. While they insist on control of their food service operations to insure "quality", they too are interested in cross promotion and feel that their Uptown development with a new arena and casino will provide multiple opportunities for restaurants in the downtown area. They reviewed their plans for food service in both the temporary facility and completed casino. In addition to the Buffet Restaurant (400 seats) they are proposing 3 other bars, a bar and grill (390 seats) and two higher end restaurants with a total of 320 seats. Again, I was grateful that both groups took the time to review their plans with us in greater detail.

I cannot emphasize enough the fears of independent restaurateurs as we consider the effect of gaming on our businesses. Western Pennsylvania is a region that has endured significant decline over the past few decades. Our population is aging and getting smaller by the day. We have lost our manufacturing base, many of our corporate headquarters and our downtown occupancy rate is declining at an alarming rate. The 50% "temporary" Parking Tax is driving companies away from the core every time they have to sign the next lease. At the same time we have witnessed major publicly subsidized development that brings many more food service venues without adding any additional customers! The Waterfront (former Steel Mill) has approximately 40 food service venue. South Side Works (another former mill) has added several more and the North Shore (Stadium area) development has used more public subsidies for outside companies to add food service. These publicly supported restaurant developments can be especially harmful if the region is not growing. Adding venues without adding customers creates an unhealthy industry for us all! Casino restaurants could also be considered "publicly subsidized." We appreciate the careful look that you give to the applications for gaming all over the Commonwealth. We hope that you are mindful of our concerns and that you make good decisions that are in the best interest of our community and our industry. I appreciate the careful way that the Pennsylvania Gaming Control Board as conducted itself and am glad that we had the opportunity to be involved.

Kevin Joyce
Proprietor
The Carlton Restaurant

President
Pennsylvania Restaurant Association

Comments: Page 2 (continued)

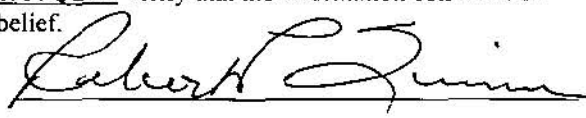
I, David Joy verify that the information contained in this written comment is true and correct to the best of my knowledge and belief.

WRITTEN COMMENT TO BE INCLUDED IN THE EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Robert P. Quinn
Address:
Telephone:
Organization, if any: Center for the Perpetuation of Human Ideas
Employer: N/A

COMMENTS: (Please use second page if more space is required) I, Robert P. Quinn verify that the information contained in this written comment is true and correct to the best of my knowledge and belief.



COMMENTS

May 30, 2006

To the Members
Pennsylvania Gaming Control Board
Harrisburg, Pennsylvania

I, respectfully, submit my comments to you regarding Casino Gambling in Pennsylvania and, more particularly, as the proposition for Casino gambling relates to the City of Pittsburgh and its environs.

1. Let me make it very clear, the Center for the Perpetuation of Human Ideas is not a physical place. It has a place, as a virtual web site, (http://geocities.com/rpq126) that exists, only, in the willing IMAGINATION of anyone who might choose to go there. I am the entity's founder and the stimulus for the future growth of the Center. One of the principal purposes of the Center is to preserve a HUMAN SCALE in the multiplicity of life transactions. I take the liberty of submitting these comments to you, knowing full-well that they will be cast aside, but it is necessary to do so because the record must show that someone, at least one person, rose and stated that the concept of Casino gambling— gambling in any form — goes against the notion that there is merit in the things that we human beings do.

2. At this point in time, it would be FOOLHARDY to argue that no licenses should be issued. The state legislature created the law and you are charged with implementing the law and managing its impact on the State of Pennsylvania. The die is cast and nothing short of a revolution of the people could turn the law aside, and we all know that is not going to happen. The legislature had its moment, a great OPPORTUNITY to demonstrate its COURAGE and it opted out. Thus, the monster has been given life: Economic persons will become enormously rich; political persons will enhance their political power, social persons will add Casino gambling to their vast repertoire of mindless entertainment and pleasure; religious persons will remain silent. Gross proceeds from Casino gambling in Pennsylvania will be widely distributed: There will be some winners; there will be many more losers, perhaps, too numerous to tabulate. Some property tax and rent relief may occur; few skilled and moderately high-paying jobs will be created; Casino gambling will, ultimately, blend with the landscape. HUMAN SCALE will be, generally, ignored and collateral social problems will be born.

3. The City of Pittsburgh will be granted one license to operate a slot machine parlor. The competition among applicants is already brisk and, perhaps, somewhat questionable, but the Monster must be fed. That the Casino slot machine parlor will impact the City of Pittsburgh for decades, if not generations to come, is indisputable. Many speak of the Casino's contribution to the betterment of Pittsburgh and its environs; but few know anything. REALITY is obscured by OPTIMISM.

4. The City of Pittsburgh, on the threshold of Casino gambling, is in the midst of a spate of proposals to re-develop its downtown area, the Golden Triangle; the North Shore development is proceeding swiftly. The Port Authority believes that it will build a 2,000ft light-rail tunnel under the Allegheny River from the Point to the North Shore — I call it Pittsburgh's FOLLY. (Is there anyone on the planet who believes that it will be built for the projected $400 million dollars? The final cost will be doubled. That is just the way it is on government-sponsored projects.) How much of the activity in Pittsburgh is real or

imagined is anyone's guess; how much of it is "hype" or "illusion" one can only wonder. Some things seem to be quite clear, however: The city is bound and determined to make-over the Golden Triangle and North Shore into places for upscale housing; entertainment and epicurean meccas for unbridled pleasure-seekers, artistic and cultural venues where the meaning of life might be found. But, nowhere are plans discussed or offered for the enjoyment of SERENITY, QUIETUDE, REST, CONVERSATION, among other things that point to a HUMAN SCALE.

5. Into all of the forgoing turbulence, you are charged with placing a Casino slot machine parlor. Whether or not any one or all of you have thought about the task ahead, it seems clear that you may have more to say about the future of Pittsburgh than anyone can imagine. You have been granted the power to do many things in order to create the most compatible, most beneficial, most responsive venue for the gambling facility for the City of Pittsburgh environs and all of the people who live there or might go there. If you do not understand what I mean by HUMAN SCALE, you will soon find out because that is where you must go in your deliberative process.

6. I offer two situations that exist in Pittsburgh which, I trust, are already familiar to you and which will be considered by you:

A. There are parallel universes at work in Pittsburgh: One is the educational/medical/research domain centered in the Oakland section including the major universities, medical facilities and dense population. The second is the existing Golden Triangle, where the emerging "upscale" community is developing.

B. The second is the Hill District, now a struggling Pittsburgh community, sitting between the parallel universes. The Hill District, has been virtually ignored by the City of Pittsburgh in all of its 250 years. (Soon, a magnificent party is to be held celebrating Pittsburgh's 250 years.) Through the middle of the Hill District is situated Centre Avenue, at one time, a vital part of the immediate Hill District and a transportation corridor from Pittsburgh to its eastern border, some 10 miles away. Give or take, a turn or two, Centre Avenue is virtually a straight line through the Hill District and contiguous with many of Pittsburgh's, other, older and cherished neighborhoods.

Now, I believe that this situation ought to be, clearly, within the scope of your authority to cause the operator of any Casino parlor in the City to be required to, significantly, participate in bringing these parallel universes together as a unified whole. Further, the means of doing that ought to be, in part, an OBLIGATION of the licensee. For too long, the Hill District has been ignored. Where is the HUMAN SCALE in your work? I am, at this time, showing it to you.

I, respectfully, submit a copy of a Pittsburgh map, as modified. I sent this to the Port Authority when they solicited input about the light-rail tunnel to the North Shore. I suggested they should scrap the idea. I claimed then, and I state again, the concept is sheer FOLLY. Spending the $800 million dollars on a transportation project through the core, "Centre Avenue," of Pittsburgh makes an enormous amount of sense, something that should not be ignored any longer. The Port Authority ignored my submission; I am certain that you will, too. Perhaps, some future historian will find it and make the connection to HUMAN SCALE.

May I add one final note? My comments included herein should not be understood to mean that I am advocating, in any way, shape or form, for the applicant for the Upper Hill site. At the very outset of the licensing process, when the applicant for that site and the hockey team joined together to say, in essence, "Grant the license to me or the hockey team is going to leave town." In fact, they are already posturing to do so. Astonishingly, no one in Pittsburgh blinked; no one saw any apparent wrong in that utterance. Only a short time later did one person speak and that was the applicant for the North Shore site who said: "Is that legal?" In a process that was born of the law, structured in the law, managed by the law and surrounded by lawyers, only one person, an applicant, inquired.

It is preposterous that one could expect to find a HUMAN SCALE in the Casino gambling process in Pennsylvania. I am optimistic that, as members of the PGCB Board, you will make a conscientious effort to look, but I will understand that there will be so many forces arrayed against finding a HUMAN SCALE, that you may have to reconcile the process as best you can. Casino gambling in Pennsylvania is about the LAW. No one has ever argued, successfully, that the LAW and HUMAN SCALE are compatible ideas.

Thank you for receiving my submission.

Legend:

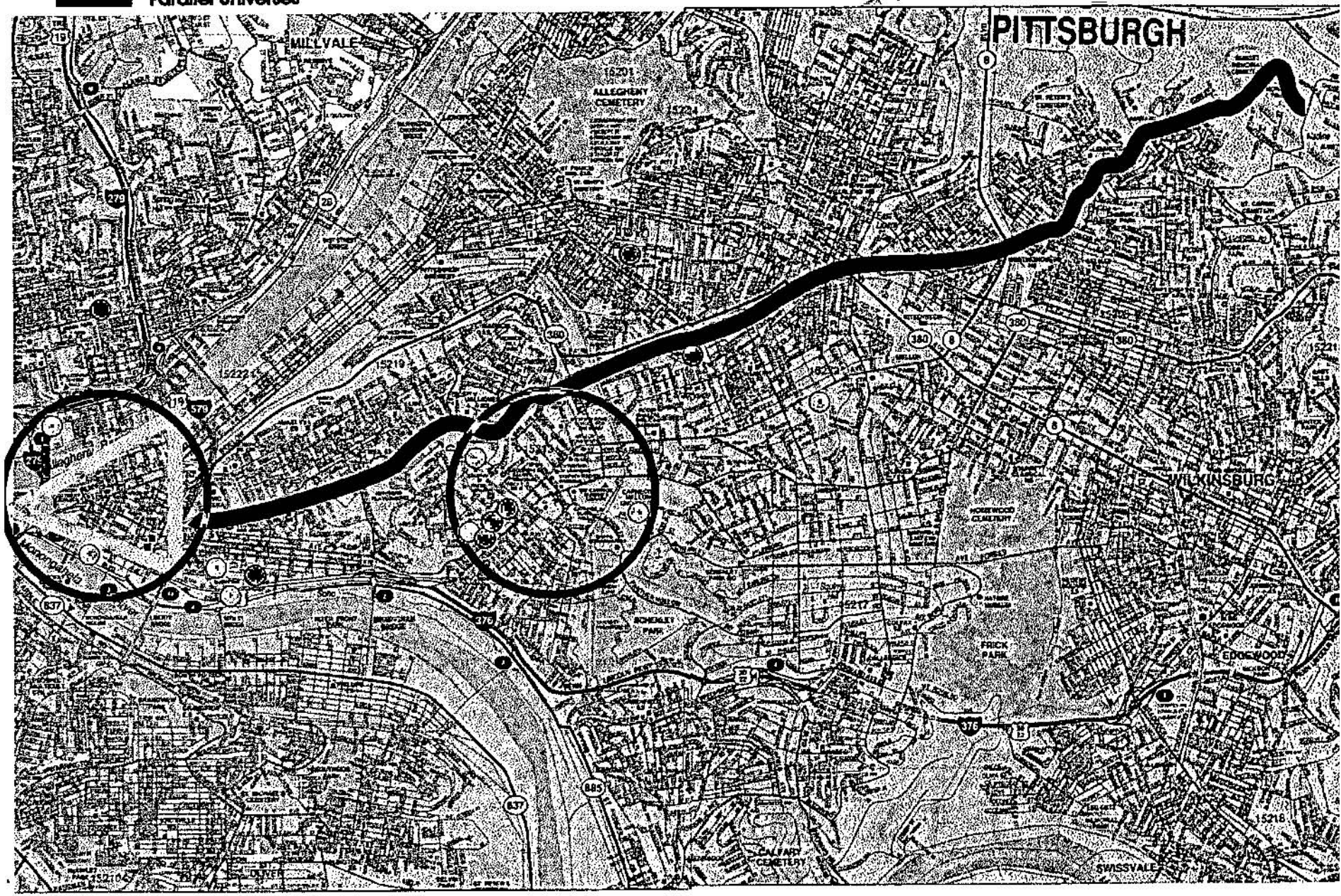
- Present "Golden Triangle"
- Proposed New "Golden Triangle"
- Centre Avenue
- North Shore Tunnel
- Parallel Universes
- Hospitals
- Institutions of higher learning

North Shore Tunnel Comments

Submitted to: Port Authority of Allegheny County

Submitted by: Robert P. Quinn with letter attached

Date: December 26, 2005



Urban League of Pittsburgh

Empowering Communities. Changing Lives.

May 26, 2006

Tad Decker
PA Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106-9060

Dear Mr. Decker,

The Urban League of Pittsburgh is excited about the possibilities for economic development that the gaming industry can bring to the region. However, as one of the leading social service agencies in Western Pennsylvania and a leading advocacy agency for African Americans, we are also concerned about the negative impacts this industry will have on our communities. In addition, we are very interested in the plans proposed by each applicant regarding diversity and community reinvestment.

While we acknowledge the many positive economic impacts that the gaming industry can contribute, numerous studies have shown that the introduction of gaming can have adverse effects, including increased crime, bankruptcy filings, suicide rates, divorce rates, and need for social services. Moreover, gambling addiction often disproportionately affects lower-income and minority populations. Therefore, it is imperative that the successful local applicant not only reinvest part of their proceeds into our communities but that this funding is handled appropriately and distributed fairly.

It is the Urban League of Pittsburgh's mission to enable African Americans to secure economic self-reliance, parity and power, and civil rights. We believe that the gaming industry can assist us in accomplishing this mission by creating equal employment opportunities and by actively ensuring that diversity is a top priority. Diversity should not only be required but also encouraged, and we are willing to assist the successful applicant in recruiting and hiring qualified minority candidates.

Furthermore, we strongly encourage you to use the authority of the Gaming Control Board to enforce the gaming legislation's diversity requirements and to see that community reinvestment funding is handled appropriately and distributed fairly.

Sincerely,

Esther L. Bush
President and CEO

Cc: PA Gaming Control Board Members

Borough of Whitehall

A HOME RULE COMMUNITY

FOUNDED 1948

March 31, 2006

Tad Decker, Chairman
Pennsylvania Gaming Control Board
P. O. Box 69060
Harrisburg, Pennsylvania 17106-9060

Dear Mr. Decker

The success of the Pittsburgh Steelers Football Team and their "Steeler Nation" has demonstrated, in spectacular fashion, the value of a major sports franchise to a city, region and state. Consequently, when a city, region and state have a major sports franchise, in whatever sport, they must work together to keep it from relocating to one of the many parts of the country where it would be welcomed by the government officials there with lucrative economic incentives.

As you know, the City of Pittsburgh, the Greater Pittsburgh Area and the Commonwealth of Pennsylvania are in danger of losing the Pittsburgh Penguins hockey franchise to another part of the country. There are no government officials who are in a better position to stop the Pittsburgh Penguins from leaving the Commonwealth than the Pennsylvania Gaming Control Board (PGCB). As the Mayor of the Borough of Whitehall, a suburb of the City of Pittsburgh, I am urging the PGCB to exercise its power to grant a casino license to an applicant that will provide substantial funding to build a new arena for the Pittsburgh Penguins. In doing so, the PGCB will not only benefit the Penguins and their supporters, but it will also benefit those individuals and families who attend the circus, ice shows, rock concerts, and all of the forms of entertainment which require a large indoor arena.

It cannot be stated enough that Mellon Arena (where the Pittsburgh Penguins play) at 45 years old and the oldest arena in the National Hockey League, needs to be replaced. The renovations to Mellon Arena which occurred in 1997 were only intended to last for ten years. This means that, in 2007, a year in which major renovations will be needed to Mellon Arena, its lease will expire with its biggest tenant, the Penguins, making it much more difficult to pay for the capital improvements which must be made. The last thing that the City of Pittsburgh needs, as it works to achieve a stronger economy, is a huge, old, deteriorating structure with insufficient revenue to keep it

operating, let alone to make the essential repairs. Additionally, the loss of revenues attendant to each major entertainment attraction that would simply not come to Pittsburgh or go elsewhere including amusement and parking tax revenues, would be significant.

The City and County are not in a position to put massive amounts of public money into building a new arena. Why should they when there is at least one applicant for a slot license who is willing to do it for both municipalities using private money and two other applicants who are capable of doing the same?

The elected officials of Whitehall Borough were never enamored with the notion that gambling revenues are an appropriate replacement for local real estate taxes to fund education. Now that gambling is here, why not use it to create the greatest public good that residents of Western Pennsylvania can actually *see* as a benefit? As a local elected official, I would urge you to grant a casino license only to an applicant who will invest in an arena to replace Mellon Arena.

Sincerely,

James F. Nowalk

James F. Nowalk, Mayor
of the Borough of Whitehall

cc: The Honorable Edward G. Rendell, Governor
The Honorable Daniel Onorato, County Executive
The Honorable Robert O'Connor, Mayor

Matthew Nelson

March 29, 2006

PA Gaming Control Board
PO Box 69060
Harrisburg, PA 17106-9060

To Whom It May Concern:

I am a concerned tourist who recently visited the city of Pittsburgh. I spent $100 on a hotel room, $100 on food, and $20 at one of the local museums. This money was spent because of my desire to see a sports team play – the Pittsburgh Penguins.

Being from Central Indiana, I had many other options I could have chosen. I could've seen the Chicago Blackhawks, only 2 ½ hours away from me. Or I could've seen the Columbus Blue Jackets, whose arena I actually passed on the way to Pittsburgh. But instead, I drove 7 hours to see the Penguins.

As a tourist who came to Pittsburgh solely to see the Penguins, it would be a shame if they were to move. My tourist dollars, along with the money of thousands of visitors who come to your state for the same reason as I do, would undoubtedly get spent elsewhere if the Penguins could not stay in Pittsburgh.

I am aware that Isle of Capri Casinos has put together a plan to provide a new arena for the Penguins if they are given the slots license. A state-of-the-art arena like what they have proposed could bring in so many different shows, concerts, and events – not just hockey. Obviously this would mean more money for local businesses, and it could entice tourists to travel to Pittsburgh more often.

If for no other reason than for the economic benefits your state receives from tourists like me, please do whatever is in your power to help keep the Pittsburgh Penguins from becoming the Kansas City Penguins. The team and its owners have done a lot to promote your city, and they deserve so much more than to be forgotten and ignored.

Sincerely,

Matthew Nelson

Pennsylvania Gaming Control Board

WRITTEN COMMENT TO BE INCLUDED IN THE EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: CARL REDWOOD

Address

Telephc

Organization, if any: Hill District Consensus Group

Employer: Kingsley

COMMENTS: (Please use second page if more space is required)

The Hill District Consensus Group is made up of more than 70 organizations that are based in the Hill District. Our membership includes local businesses, churches, social service and community organizations. The purpose of the Hill District Consensus Group is to work together through the differences, and with the commonalties, so to establish and enforce standards and processes in all aspects of community life: economic, political, spiritual and social for the on-going health and prosperity of the community.

Applicants for the slots license in Pittsburgh are planning to make contributions to the construction of a new arena for the Penguins and the Sports and Exhibition Authority that will be located in the Hill District near the Civic Arena site.

The Civic Arena was built by the razing of the Lower Hill District and the eviction of more than 20,000 Hill District residents. Various tenants and owners have collected box office revenue and parking fees for more than 40 years. They have never contributed or been supportive of Hill District concerns.

The Penguins have been located in the Hill District since 1967. They have never viewed themselves as a Hill District neighbor. The Penguins have historically turned their back on the Hill District and welcomed their fans who come across the Liberty Bridge and the Veterans Bridge. The Penguins have renamed Hill District streets for Mario Lemieux not for Frankie Pace. The Penguins have never contributed or been supportive of Hill District concerns.

The Sports and Exhibition Authority (SEA) has done the same over the years. The Melody Tent site and other parking lots are filled every day with cars. Every day, cash is being taken in for parking. But those who deposit the cash do not give back to the Hill District. The SEA has never contributed or been supportive of Hill District concerns.

Today there is serious discussion of the gaming license holder providing finances for a new arena in our community for the Penguins and Sports and Exhibition Authority. The Hill District Consensus Group expects that the Penguins, the SEA and those who fund an arena in our community make a contribution and be supportive of Hill District concerns.

The Consensus Group requires that an amount equal to 10% of the amount given to the arena for the Penguins and Sports and Exhibition Authority be donated into a Community Improvement Fund and that the control of this fund is approved by the Consensus Group.

I, CARL REDWOOD verify that the information contained in this written comment is true and correct to the best of my knowledge and belief.

Carl Redwood Sr.

Pennsylvania Gaming Control Board

WRITTEN COMMENT TO BE INCLUDED IN THE EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: The Honorable Rick Santorum

Address:

Th

Telephor

Organization, if any: United States Senate

Employer: —

COMMENTS: (Please use second page if more space is required)

. Please refer to the attached let

RICK SANTORUM
PENNSYLVANIA

REPUBLICAN CONFERENCE
CHAIRMAN

United States Senate

http://santorum.senate.gov

COMMITTEES:
FINANCE
BANKING, HOUSING, AND URBAN AFF
AGRICULTURE, NUTRITION AND FORE
RULES AND ADMINISTRATION
SPECIAL COMMITTEE ON AGING

19 April 2006

Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, Pennsylvania 17106

Dear Members of the Board:

As a United States Senator who calls Western Pennsylvania home, I am submitting this letter to you at your public hearing in Pittsburgh today to express my opinion on the award of the pending Pittsburgh gaming license. I appreciate the opportunity to submit this document as a form of written testimony to be entered into the evidentiary record along with the many others who submitted comments at today's hearings.

By expanding the aging and outdated convention center, the region was able to attract new and larger conventions to the city, bringing with them first time visitors. Coupled with the additions of a world class baseball park and football field on the North Side, the City of Pittsburgh, Allegheny County and the Commonwealth of Pennsylvania have witnessed the rebirth of our city's North Shore with vibrant new entertainment venues, newly constructed offices and hotel accommodations and filled the ever-present need for additional parking near our city. Our city has even attracted this year's Major League Baseball All-Star Game in part because of the remarkable venue PNC Park is for playing professional baseball. This will translate into millions in economic and tourism impact for the region.

All of this expansion and renovation came at a steep public cost topping out in the hundreds of millions of dollars. However, we are now on the eve of a similar opportunity – but one that will bear little to no public cost.

There are two very important reasons for me to write you today. Before I begin, I would like to make clear that **I am not endorsing or supporting any particular gaming applicant but I am endorsing any gaming plan through which funding can be secured for a new arena without the use of tax dollars.**

As I've said publicly in the past, I believe the gaming license is a **public license** and therefore some portion of revenues derived from the award of the license should be used for public purposes. The opportunity for our region to build a new arena and redevelop a struggling area of Pittsburgh with some of these funds remains a top priority for many civic leaders.

In addition, replacing the outdated Mellon Arena with a new, expanded facility demonstrates continued investment in our community. It will provide another venue for attracting greater conventions and civic events, secure the Pittsburgh Penguins future, and it will create and retain hundreds of jobs above and beyond those predicted for each casino project.

Thank you again for your kind consideration of this letter. If you should have any questions, please do not hesitate to contact me individually, or as a Board, at my Pittsburgh regional office at 412.562.0533.

Sincerely,

Rick Santorum
United States Senator

Pennsylvania
Gaming Control Board

WRITTEN COMMENT TO BE INCLUDED IN THE EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: EDWARD ROHM

Addres

Teleph

Organization, if any: _____

Employer: _____

COMMENTS: (Please use second page if more space is required)

I presented the following oral testimony before the Pennsylvania Gaming Control Board in Pittsburgh on April 19 2006. I was absolutely serious when I made these statements on April 19th and I am absolutely serious today!

The public's safety rests squarely in the hands of this board so I felt compelled to present the board with the true picture of the Station Square site and its lack of highway infrastructure with the latest satellite imagery available. If all of the applicants were required to use the same occupants per vehicle in their calculations it would have ensured that all of the traffic evaluations were both fair and accurate! Instead the site that is the most highway challenged is using the highest occupants per vehicle which allows more patrons to visit their casino and lowers the traffic related problem of their site!

It is for this very reason that I am asking Harrah's/Forest City to throw out the 2.5 occupants per vehicle they used in their traffic report and submit a new one to this board within **60 days** using the combined average as submitted by Isle of Capri and Majestic Star in their traffic reports. Complying with my request would maintain continuity in all of the applications and will ensure that the public's safety is not compromised. If however Harrah's/Forest City refuses to comply with my request then I must assume that securing a license is more important than public safety and this board should as well!

The states lack of foresight to set the requirements for occupants per vehicle may have opened a Pandora's Box that has the potential for disaster! If the public's safety is in any way compromised because applicants were allowed to use figures that may have enhanced their sites appearance and this board selects them as the winner of a slots license the state may face a mountain of litigation!

Comments: Page 2 (continued)

Please keep in mind that my testimony was recorded by a stenographer and my PowerPoint presentation was entered into evidence at the hearing on April 19 and I truly expect an answer from Harrah's/Forest City by **June 19 2006**! If Harrah's/Forest City refuses to comply with my request then **I must assume** that securing a license is more important than public safety and **the Pennsylvania Gaming Control Board should as well!**

I stated in my testimony that I support the Isle of Capri proposal but there are others who have not endorsed one applicant over another who are also calling into question the lack of highway infrastructure of the Station Square site!

David Wooster is an independent traffic analyst working pro bono for the Pittsburgh Gaming Task Force has also called into question the larger occupants per vehicle being used by Harrah's/ Forest City. Mr. Wooster took issue with Harrah's traffic study methodology, noting that Harrah's predicted the highest patronage and revenue of the three applicants, but the lowest amount of vehicle traffic during Saturday peak hours? During Saturday peak hours Majestic Star is predicting 3,470 vehicle visits, Isle of Capri sees 3,558 visits and Harrah's projects just 1,536. I am far from a Rhodes Scholar or even a competent mathematician but these numbers just do not add up!

John Craig who represents the Pittsburgh Gaming Task Force asked the following question in a Post Gazette Editorial on Sunday April 30 2006.

"Are local leaders concerned enough about traffic to seize the initiative and insist that the Gaming Control Board itself institute an independent traffic and parking audit? And if the board does not do this, will they insist that funds already promised for this purpose by Don Barden of Majestic Star Casinos be made available to an appropriate government agency so there is a definitive report in hand well before any license award is made"?

Thank you Mr.Barden for your generous offer but it is not your responsibility to protect the public it is up to our elected officials and the Pennsylvania Gaming Control Board!

The hearing on April 18th ended earlier than expected and allowed each of you to personally visit all three proposed casino sites. If you think back to that day I truly believe you will agree that the Station Square site is the least favorable of the three proposals from a public safety and traffic point of view but don't take my word for it. Instead this would be a good opportunity to review my PowerPoint presentation that was entered into evidence on April 19 2006 to refresh your memory. I have also sent a PowerPoint presentation from the Pittsburgh Gaming Task Force that illustrates some of my concerns as well!

In conclusion the **public's safety** is paramount and **must come first and over all selection criteria including projected revenues**! I trust in the end each of you will make the right decision to protect the citizens of Pittsburgh and ensure that Pandora's Box remains tightly closed!

Sincerely
Edward Rohm

I, Edward J Rohm verify that the information contained in this written comment is true and correct to the best of my knowledge and belief.

_____

Pennsylvania Gaming Control Board

WRITTEN COMMENT TO BE INCLUDED IN THE EVIDENTIARY RECORD OF THE PUBLIC INPUT HEARINGS

I request that the following comments be made part of the public input hearing record and considered by the Pennsylvania Gaming Control Board prior to awarding licenses for slot operators:

Name: Patrick Sileo, Ph.D.

Address:

Telephor

Organization, if any: Attached report commissioned by Isle of Capri.

Employer: Carnegie Mellon University

COMMENTS: (Please use second page if more space is required)

SEE ATTACHED REPORT

"An Economic Comparison of Slots Casino Proposals"

Patrick Sileo, Ph.D.

5/28/2006

Comments: Page 2 (continued)

See attached report,

"An Economic Comparison of Slots Casino Proposals"

Patrick Siles, Ph.D.

5/28/2006

I, Patrick Siles verify that the information contained in this written comment is true and correct to the best of my knowledge and belief.

Pat Siles

An Economic Comparison of Slots Casino Proposals

Patrick Sileo, Ph.D.[1]

Competitive Analysis

May 28, 2006

[1] Although the writer is a faculty member at the Tepper School of Business, Carnegie Mellon University and Director of the school's Undergraduate Economics Program and Master of Science in Quantitative Economics Program, no endorsement of this work by either the Tepper School or Carnegie Mellon University is either expressed or implied.

I. Introduction

Competitive Analysis has been asked by Pittsburgh First to provide an independent review of the available economic analysis of the three major slots casino proposals for Pittsburgh, PA. The proposals have been submitted by

Isle of Capri Casinos, Inc. (hereafter "IOC")
1641 Popps Ferry Rd. Suite B1
Biloxi, Mississippi 39532

Forest City Enterprises (hereafter "FCE")
1100 Terminal Tower
50 Public Square
Cleveland, Ohio 44113

PITG Gaming (hereafter "PITG")
A Subsidiary of Barden Cos. Inc.
163 Madison Ave.
Detroit, MI 48226

Specific documents reviewed included the following impact reports:

Pittsburgh, Pennsylvania – Gaming Market Assessment
The Innovation Group
December, 2005 (hereafter "IG Report")

The Revenue Potential of a Category 2 Slot Machine Facility at Harrah's Station Square Casino
Christiansen Capital Advisors
December, 2005 (hereafter "CCA Report")

The Majestic Star Casino, Pittsburgh: Transportation and Parking Assessment
IBI Group
December 2005 (hereafter "IBI Report")

Other documents[2] included:

The Innovation Group Critique of: The Revenue Potential of a Category 2 Slot Machine Facility at Harrah's Station Square Casino
The Innovation Group
May, 2006 (hereafter "CCA Critique")

Plan of Finance: For the Construction of a New Multi-use Arena in Pittsburgh
Public Financial Management
March, 2006 (hereafter "PFM Report")

Mellon Arena: Site Redevelopment Update
Economic Research Associates
November, 2005 (hereafter "ERA Report")

[2] Where appropriate, local media stories, editorials, and advertisements have been used for information and/or commented upon.

An Economic Impact Analysis of the Pittsburgh Penguins
H. John Heinz III School of Public Policy and Management,
Carnegie Mellon University
December, 2005 (hereafter "HJH Report")

The scope of this review is limited to those issues relevant to the award of the site license. In accordance with the selection process for the award of a license, calls for the consideration of the following economic issues[3]:

- the enhancement of economic development;
- the promotion of tourism;
- the increase in tax revenues for PA;
- the creation of jobs; and
- the potential for adverse economic effects and ability to offset them.

Accordingly, the following five sections address each topic in turn.

[3] There are also general location, management, and political issues to be considered. See Pennsylvania HB2330, §1324(C).

II. Economic Development

In assessing the value of an investment to the development of the local economy, consideration is given to:

- the general level of investment;
- the location of the investment;
- the concentration of investment; and
- the type/mixture of investment.

The importance of the general level of investment is the obvious reason: all else equal, greater investment yields greater absolute returns. The remaining three issues affect the percentage return on the amount invested.

With respect to location, the single most critical issue is the extent to which the property values at the investment site and surrounding area are depressed relative to the general region. Of course, if the site itself is already at first-best use, it is already regionally well-valued and not an appropriate area for more investment. All of the proposed investment sites are currently at sub-optimal use and all of these properties will benefit from investment Of more importance to overall economic development, however, is the extent to which the surrounding region is currently depressed. Investment in an area creates positive economic externalities for the surrounding area, multiplying the overall impact of the investment. Simply put, developing a vacant block in a marginal neighborhood improves the attractiveness of the area as a whole.

The concentration of investment is important due to the existence and nature of *critical thresholds* – a regional investment level above the threshold makes long-term project success likely, and conversely below the threshold risks a project's long-term survival.[4] Although depressed regions offer much higher potential returns, isolated investment risks sub-optimal returns to capital or even the failure of the project itself. Unfortunately, economists at this time can only confirm the existence of critical thresholds. We cannot predict the threshold level of investment for a new project. What we can say is that the more concentrated the investment, the greater the likelihood that the threshold will be exceeded and the greatest benefit of the investment dollars realized.

An idea of related importance is the mixture of investments in a region. Long-term success depends on establishing a stable mix of residential, small-commercial and major-commercial properties. Although investment in just one of these types may spur independent investment in and development of the others, a mixture of types with the initial investment helps ensure that the long-run stable state will attain. Typically, the major-commercial property acts as an economic "anchor", around which residential and small-commercial (serving both workers and residents) can take permanent hold.

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[4] For a recent discussion of threshold effects and empirical support for their importance, see Accordino, Galster & Tatian, *The Impacts of Targeted Public and Nonprofit Investment on Neighborhood Development*, Federal Reserve Bank of Richmond, 2005.

The following table summarizes these important economic development/investment issues across the proposals.

Comparison of Proposed Investments

Proposal	Isle of Capri (IOC)	Harrah's (FCE)	Majestic Star (PITG)
Level	‡	‡	‡
Location	Uptown/ Lower Hill	Station Square Uptown	Northside Uptown/ Lower Hill
Concentration	Single Location	Divided	Divided
Mixture	Casino† Arena* Residential & Small Commercial [a]	Casino†† Arena** Residential & Small Commercial [b]	Casino†† Arena*** Residential & Small Commercial [c]

‡ All parties represent total investment in the $1 billion range. No party represents significantly more or less total investment than any other.

† Adjacent location of new arena, temporary followed by permanent casino

†† Separate from arena location, no temporary casino.

††† Separate from arena location and residential/commercial development, temporary followed by permanent casino.

* $290 million funding is pre-approved and monies are available within 90 of licensure.

** No specific dollar commitment.

*** $225 million ($7.5 million per year per Plan B, guarantee is unknown).

[a] Residential and small commercial in the same area as the major commercial development.

[b] Residential/small commercial located in Station Square area.

[c] Residential/small commercial at unspecified Hill District locations, separated from casino.

We can now consider the relative merits of the proposals when it comes to economic development. First, in terms of announced levels of investment, the all of the proposals are comparable – announced differences are not significant. That leaves us with the effectiveness of investment issues.

The simple and effective way to think about the location issue is to ask whether or not the areas affected are either currently highly valued or likely to be developed even without the related project. If so, it is an inappropriate location from an economic development standpoint. On this measure, IOC does extremely well, bringing needed investment to an area that has remained economically stagnant for decades. FCE, by comparison, fares worst, concentrating investment in the well-established and economically healthy Station Square area. PITG lacks specifics when it comes to community development, but even an optimistic assessment which remains to be fleshed out results in ranking it in between the IOC and FCE proposals. Community development is targeted to the "Hill District" – an area in need of investment dollars – but the proposal is non-specific and without an announced source of financing. Consequently, it should be ranked placing, but behind

IOC, which has presented a concrete plan to bring greater dollars[5] to Uptown/Lower Hill District.

When it comes to concentration of investment, only IOC brings the new arena, casino, residential and small commercial development to a single area. FCE concentrate all but the arena to a single area. However, that area (Station Square) is the worst location from an economic development standpoint. PITG, if we once again optimistically assess the unspecified[6] "Hill District" investment, concentrates both the new arena and residential development well, but isolates the casino development.

As for mixture, IOC provides the full range in a single area, so that maximum advantage is taken of economic complementarities. FCE does well on this front, too, but again in an already economically developed location, minimizing the overall benefit. PITG seriously undercuts the viability of its unspecified Hill District investment by not bringing the new major commercial development – the casino – to the same/adjacent location.

Overall, this author rates the proposals on the economic development issues as follows:

Ranking of Proposed Investments

Ranking	Best	Middle	Worst
Level	*No difference*	*No difference*	*No difference*
Location	IOC	PITG	FCE
Concentration	IOC	FCE	PITG
Mixture	IOC	FCE	PITG

From an economic development standpoint, IOC dominates[7] the other proposals. When deciding which is second-best, neither FCE nor PITG dominates the other and consideration must be given to the relative importance of the listed factors. Since the location difference is both substantial and important, it can be reasonably argued that PITG should be considered superior to FCE on this front.[8]

Note: The preceding analysis assumes that the proposed development will actually go forward if the license if awarded. Substantial differences exist, however, with respect to the extent to which funding is assured across the three proposals. IOC has in place a bank guarantee of up to $600M for the project and $350M from Nationwide Realty, the

[5] -- including major commercial investment in the same area. If PITG dollars are simply taken at face value, residential/small commercial dollars are comparable with IOC. The latter, however, bring the casino investment to the same/adjacent area.

[6] -- in terms of the actual properties and plans involved.

[7] That is, it is better in every category (except level, where all are comparable).

[8] The decision between second and third is relatively close, however, and other respected analysts might reverse the above ranking. (That IOC is first-best is clear cut, however.)

balance of $100M to $150M coming from IOC cash on hand. The source of FCE funding has not been disclosed. PITG has a best efforts letter, but not disclosed its plans for the lower hill. Absent these plans, it is difficult to access the certainty of funding. Taking these issues into account only reinforces this sections overall conclusion. On economic development, IOC is certainly best option, followed by PITG and then FCE.

III. Tourism

There is nothing in any of the reports to suggest the there will be any difference across these projects in terms of their ability to attract tourists. One point with respect to Harrah's participation in the FCE proposal should be noted, however. Harrah's prides itself both on its integrated (across casinos) customer database and on its ability to maximize global customer value (across operations). While the other casino operators restrict themselves to regional operations, Harrah's additionally operates in the national (arguably international) gaming market through its Las Vegas operations. It seems clear that Harrah's has an incentive to convert Pittsburgh gaming dollars to Las Vegas or Atlantic City gaming dollars for at least some the Pittsburgh clientele, since the tax on the gaming dollar is so much lower in Nevada. We must at least wonder what effect this conflict of interest might have on the extent to which they attract tourism locally.

This concern is shared by CCA Critique:

> *Harrah's uses reward programs to send gamers to other properties and generate overnight stays. These jurisdictions, i.e. Atlantic City, New Orleans, and Las Vegas, all have considerably lower gaming tax rates than Pennsylvania, and offer on-site or nearby recreational and entertainment alternatives that would permit these trips to be truly called rewards. It would be to Harrah's benefit to identify high valued gamers and send them to these low-tax jurisdictions for their gaming. Additionally, as Harrah's is not the proposed sole owner of the property, profits derived from the casino would be shared, further limiting the benefits Harrah's would derive from sending gamers to Pittsburgh rather than one of the 100% owned properties.*

Unlike the operators of the alternative proposals, Harrah's operates in two competing markets (national and regional). Importantly, regional markets do not tend to compete with other (distant) regional markets. Traveling customers simply prefer Las Vegas (or perhaps Reno or Atlantic City) over the regional alternatives, such as Biloxi, Mississippi. The award of this license to FCE would result in having Harrah's being both the city's/state's partner locally and its competitor nationally. Given that this creates incentives for Harrah's to offer attractive Las Vegas and Atlantic City packages to people who might otherwise find Pittsburgh more convenient, it is potentially at odds with the intent of the enabling legislation.

IV. Tax Revenues

Sources of possible differences in tax revenues across proposals fall into two categories.

- Direct effects: differences due to variations in gross gaming revenue generated.
- Indirect effects: differences due to economic development and changes to the property tax base.

The indirect effects are linked to precisely those issues considered in Section II of this report. In these criteria alone, the proposals were ranked:

$$1^{st} - IOC,\ 2^{nd} - PITG,\ 3^{rd} - FCE$$

There remain the direct effects to be considered, driven by potential differences in gross revenues. As a part of any such analysis, one needs to estimate the number of visitors – both for an understanding of physical demands on the location and to estimate the impact on economic factors. The three impact reports generate the following estimates:

Report	Produced for	Estimated Annual Visits	Estimation Method
IG	IOC	6,027,671	Gravity Demand
CCA	FCE	6,000,000	Gravity Demand
IBI	PITG	5,709,600	Comparable Markets

All-in-all, the differences in the estimates are small. It is critical to understand, however, what these numbers mean – or, more to the point, what they do not mean. These are estimates for a Pittsburgh-based facility of type and size consistent with the various proposals. Differences in these estimates say nothing about which plan will attract the most visitors, as they are not plan-specific. Differences simply reflect reasonable variations in assumed consumer-behavior and the estimation method employed.

Similarly, the reports supply revenue estimates:

Report	Produced for	Estimated Annual Gaming Revenue
IG	IOC	$400,000,000
CCA	FCE	$664,200,000
IBI	PITG	$400,000,000

Here, the difference is substantial, but again only reflects differences in the estimation procedure and underlying economic/consumer-behavior assumptions.[9] Nothing at all can be reasonably inferred about the relative revenue streams of the competing proposals.
This last point is important as supporters of the FCE proposal have at least informally argued that it will generate substantially more gaming revenue (and therefore more tax revenue). Again, this conclusion is not supported by the studies – it simply goes to a

[9] CCA Critique makes an excellent case for considering the $664.2 estimate to be unreasonably high, but the basic point remains that it is not operator specific – even if true, it would apply to all of the proposals.

question the models do not address. Issues that are relevant to this question, such as brand loyalty and comparative performance in other markets, are addressed in CCA Critique, which concludes in part:

- [CCA Report] is a market study and is not operator specific.
- ... the Harrah's site may not be better than those that are proposed by either of the other applicants, and certainly not over 50% better...
- The calculations and models used by CCA are at times erroneous and at other times aggressive.
- The projections made by CCA are far greater than made by other analysts for Pittsburgh area casinos and are just too high.
- Harrah's has a strong recognized brand but there is no credibility in assuming that the brand could generate a significant premium to fair share.
- Harrah's rewards program actually could dilute the casino's revenue potential rather than add to it...

Upon review of CCA Critique, it is this author's expert opinion that its conclusions are well-reasoned and supported by the data cited therein. Indeed, the first item is just the point made in the preceding paragraph, while the last is expanded upon in the section below on tourism.

The lack of credible argument that any proposal would general greater revenue than the others is directly related to the basic economics of the situation. There is only a single license for the Pittsburgh area, effectively creating a local monopoly for whoever receives the award. Revenues to monopolists who control a desirable product tend to be insensitive to local management, etc. Such issues are important for assessing how total revenues will allocate themselves among local competitors, but even then they are at best a second-order effect on total revenue for the region. Hence, variations in projections reflect differences in methods, models, and assumptions rather than real differences across operators and/or proposals.

The ranking of proposals on this issue is thus driven by the indirect effects and is the same as indicated above.

1^{st} – IOC, 2^{nd} – PITG, 3^{rd} – FCE

V. Employment

Just as with tax revenues, one must once again consider direct and indirect effects.

- Direct effects: employment produced by the elements of the proposed entertainment complex, such as casino, restaurant, retail or entertainment jobs.
- Indirect effects: employment created as a result of the spending of the casino and its employees.

As with revenue projections, estimated employment figures across the proposals vary widely. But also like the revenue projections, there is very little reason to think that any of the plans will generate significantly more (or less) employment than a rival plan.

Consider first the direct effects. The interested parties have provided the following employment estimates:

Proposal	Est. Jobs	Source
FCE	3953	CCA Report
PITG	1500	published comments
FCE	979	IG Report

On its face, the largest of these estimates appears to be substantially inflated. The FCE figure is approximately twice the number of employees at other Harrah's locations – facilities which feature not only slot machines, but also table games. Since the latter are far more labor intensive than slots, and since the enabling legislation permits slots only, it is difficult see how the 3953 estimate can be justified – even after taking into account that only half of the number are "expected" to be full-time positions.

More importantly, the differences across the studies once again do not reflect differences across the proposals, but only differences in methods and procedures (and individual conjectures). From an economic standpoint, the proposals are more striking in their similarities than their differences. Similar proposals, with similar overall levels of investment and similar attendance projections will in the final analysis result in a similar number of jobs created. Furthermore, even marginally different plans at the outset are likely to converge to similar final equilibria, since the basic economic forces will be similar across operators.

This economic reality applies equally to the case where we consider indirect effects. Indeed, since indirect employment effects flow from the direct activities of the enterprises, similarity of direct effects naturally implies similarity of indirect effects. In short, this writer can find no advantage to any of the proposals (relative to the others) when it comes to employment. All will be beneficial, but none predictably more so than another.

VI. Adverse Economic Effects

Generally, adverse economic effects fall into one of two categories: infrastructure demands and negative impact on existing businesses. From the standpoint of making a decision among proposals, it is (once again) relative effects that are important. Thus, attention is restricted to areas where there are potential differences across proposals. Two issues have been prominent: local traffic impact and the risk of losing the local National Hockey League franchise to another city.

Let's begin with the traffic issue. This writer is not a traffic engineer, but the economic relevance of potential traffic problems cannot be taken lightly. Access difficulty can easily affect consumer demand. Furthermore, the adverse affects of traffic snarls are not limited to the new enterprise, but also fall on other nearby businesses which rely on the same transportation infrastructure. All of the applicants have submitted traffic studies, and more importantly there has been an independent review these studies. The latter is the most valuable for this report's purposes.

Prepared by David E. Wooster and Associates, Inc., the critique compares the critical assumptions underlying the three traffic studies. Comments from the report are summarized in the following table.

	IOC	FCE	PITG
Report Analyzed All Peak Traffic Periods	✓		
Scope Appropriate to Studied Proposal	✓		
Mitigation Strategies Fully Described with Cost Estimates	✓		*
Study Includes Impact of Additional Development	✓		

* See below.

The report offers some specific criticisms.

- IOC's anticipated trip generation appears conservative.
- FCE's trip generation is underestimated; its application of captured trip percentage is not appropriate and its application of current Station Square vehicle occupancy is not applicable. FCE's report did not analyze AM Peak, Friday Peak or Event Peak as requested.
- PITG mitigation measures are described as "vague".

Although all of the reports make the case that traffic for the plan analyzed will be manageable, the Wooster critique finds substantial differences in the studies' quality. Of the three, the IOC study is relatively well received, there are some criticisms of the PITG study, and there are substantial problems with the FCE study.

Let us now turn attention to the Pittsburgh Penguins issue. What we look at here is really the flip side of the economic development advantages associated with the arena. The question is to what extent the proposed plans are substantial and certain enough to ensure that the NHL franchise remains in Pittsburgh, as well as the economic costs of failing to do so.

Beginning with the latter, the author has examined HJH Report, an economic impact study of the Pittsburgh Penguins. A relatively standard analysis, the report's estimated direct economic impact of the team on the region is $70M per annum. This figure is comparable with those found for other sports teams in similar markets. Multiplier analysis is used to include indirect economic benefits, with a total estimated impact of between $87 and $281 million annually. The range is a bit wide, but probably well reflects the inherent uncertainties in this type of work. This author's best estimate would be in the range of $180M to $200M. In any event, it is clear that the loss of this franchise would have a serious adverse economic impact.

Following the lead of Isle of Capri, all applicants have now at least discussed the possibility of arena funding. At this time, they have made the following commitments with regard to funding for a new arena:

Proposal	Isle of Capri (IOC)	Harrah's (FCE)	Majestic Star. (PITG)
Funding Level	$290,000,000	No specific commitment	$225,000,000
Terms	Up front, within 90 days of licensure	Along the lines of Plan B	$7.5 million per year, per Plan B

The Pittsburgh Penguins have (not surprisingly) publicly endorsed the IOC proposal. It seems fair to say that they will certainly stay in Pittsburgh if it is awarded the license. FCE has indicated that they will proceed with negotiations on the arena upon licensure. However, once the license is granted it does not appear that FCE has any economic motivation to strongly pursue any arena plan. The PITG proposal seems to have been made in earnest, and while not as

attractive as the IOC plan, has a reasonable – although less than 100% – chance of retaining the Penguins. Based on private conversations, 80% chance of retention might be a reasonable guess. In any event, it once again seems straight forward to rank-order the proposals on this point, with IOC being the most attractive, PITG next, and FCE least attractive.

VII. Summary and Conclusions

The following table summarizes this report's findings for each of the general factors considered:

	Best	Intermediate	Worst
Economic Development	IOC	PITG*	FCE*
Promotion of Tourism	**	**	FCE
Generation of Tax Revenue	***	***	***
Job Creation	***	***	***
Minimize Adverse Economic Effects	IOC	PITG	FCE

* Close call between PITG and FCE on economic development.

** Little to distinguish IOC and PITG on the tourism factor. FCE suffered from the economically conflicting interests.

*** There is little to distinguish the plans with regard to the direct effects on tax revenues and jobs. However, if one also considers the indirect effect of economic development, the order from best to worst is IOC, PITG, FCE.

When both direct and indirect factors are considered, the IOC proposal is to better the other two on every critical issue considered. In light of the legally mandated decision criteria, the license should be awarded to IOC.