



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: Beth Vucic

Address: _____

Telephone: _____

Organization, if any: _____

Employer: _____

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

The proposed Harrah's casino at Station Square would be a huge mistake, causing traffic nightmares on the Sixth side and even backing up downtown. It would also eliminate one of the only reasonable parking lot prices around the city. There is already enough attraction to Station Square.

I recommend the casino and arena to be located in the Hill District - to revive that area and create a new attraction area.

Comments: Page 2 (continued)

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

Beth Weir



**Pennsylvania
Gaming Control Board**



**WRITTEN COMMENT TO BE INCLUDED IN THE
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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 T. Aumer

Address: _____

Telephone: _____

Organization, if any: _____

Employer: _____

RE: PITTSBURGH CASINO SITES;
COMMENTS: (Please use second page if more space is required)

MY CONCERN IS TWOFOLD AS TO THE
STATION SQUARE PLAN:

- 1) TRAFFIC
- 2) POLLUTION

AS TO 1). The study used 2+ people per auto. We in the Burgh cannot get people to carpool so they can get out of traffic and use the HOV lane. They aren't going to start to go play the slots. Case in point go to the various Ludbrooks OTB centers around here and see how many "single drive in."

AS TO 2). I see continuous traffic jams - 15-18S CAUSING DANGER AND POLLUTION LEVEL

Comments: Page 2 (continued)

I have no traffic/pollution problem
with North Shore on Center City.

Thank you.

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

Robert T. Aumer



Pennsylvania
Gaming Control Board



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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: Scott Fisher

Address:

Telephone:

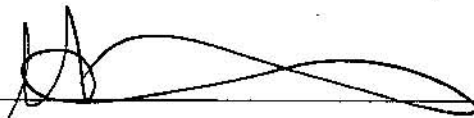
Organization, if any: ~~THE INNOVATION GROUP~~

Employer: THE INNOVATION GROUP, INC.

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

Comments: Page 2 (continued)

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



A handwritten signature in black ink, appearing to read 'Scott Fisher', is written over a horizontal line. The signature is stylized and cursive.



THE
INNOVATION
GROUP

To: Pennsylvania Gaming Control Board
From: Scott Fisher, Ph.D., Managing Director, The Innovation Group
Re: Public Comment on Pittsburgh Gaming license

Please find attached a critique of the market analysis completed by Christiansen Capital Advisors in December 2005, in which we found numerous mathematical errors, as well as faults in logic leading to their revenue projections. Had these projections been based more on reasonable comps and accurate math, the revenue projections would have been more in line with the other two applicants. Assumptions regarding the added value of the rewards program also are not rational, as there is more of an incentive to identify local gamers and bring them to out-of-state casinos with lower tax rates than vice versa.

I have also attached a brief description of our firm and our principals, and more information can be found on our firm at our website, www.theinnovationgroup.com.

Thank you for your attention.

Scott Fisher, Ph.D.
Managing Director
The Innovation Group



The Innovation Group is the premier provider of consulting and management services for the gaming, hospitality, leisure and entertainment industries. Services include feasibility studies, market research, operations and marketing advisory services, strategic and financial planning and legislative support for clients throughout the U.S. and the world.

The Innovation Group's unique mix of talents allows us to take a multi-disciplinary approach to evaluating operations, implementing turnarounds, managing properties and developing strategic business and marketing plans. For many of our clients, we've offered cost effective and reliable ways to improve operating efficiencies and profit margins.

At The Innovation Group, our depth of expertise in a wide array of analytical tools helps make strategic planning as reliable as it can be. From market assessments to evaluate a location to market research to determine the optimum mix of amenities to management advisory services to keep everything running at peak efficiency, we undertake each assignment with extreme accuracy and attention. To date, The Innovation Group reports have been responsible for more than \$26 billion in investment decisions.

Company principals include:

Steven M. Rittvo, President. As a veteran of over 1,000 planning studies, Steve is principal-in-charge, providing overall policy direction, technical oversight and manpower allocations for the company.

Stephen J. Szapor, Jr., Chief Operating Officer. Steve has a solid track record helping casinos and hotels operate at peak efficiency, having worked in casino operations for over 18 years before joining The Innovation Group in 2001. Steve works with a variety of clients on high-level strategic and financial planning, primary market research, operational and marketing consulting, and feasibility and market analysis.

Paul Girvan, Managing Director. As a British-trained demographer, geographer and economist, Paul has conducted an extraordinary array of industry research projects, often pioneering new techniques and combining existing research tools to provide more insightful, reliable analysis.

Dr. Scott Fisher, Ph.D., Managing Director. Scott assesses what our clients can expect when operating in international markets. He also performs various asset valuations to evaluate potential property sales, purchases and litigation processes, as well as generating economic impact reports that many clients require for governmental support of their projects

The Innovation Group Critique of:

***The Revenue Potential of a Category 2 Slot Machine Facility at
Harrah's Station Square Casino***

Prepared by Christiansen Capital Advisors, LLC December 2005

Executive Summary

The Innovation Group reviewed the market revenue forecast performed by Christiansen Capital Advisors, LLC in December 2005 for the Harrah's Station Square Casino. The review disclosed numerous flaws, ranging from over-generalizations to pervasive mathematical errors. The Innovation Group's review concludes that:

- The Christiansen Capital Advisors study (the "CCA Study") is a market study and is not operator specific.
- The Pittsburgh gaming market potential would be equally applicable to all three applicants provided the product, amenities, operation, access and the parking are comparable – the location and amenities proposed for 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, as CCA's conclusions would suggest.
- 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; i.e., Harrah's best interests would be served by rewarding Pittsburgh customers with visits to lower taxed Harrah's casinos, i.e., Las Vegas, Atlantic City, Hammond, Indiana or other casinos, rather than move gamers from low-tax jurisdictions to Pittsburgh. Harrah's can give lucrative comps, and makes more money at these locations which have table games as well as slots.

In December 2005, Christiansen Capital Advisors (CCA) prepared an estimate of the gaming market potential for the proposed Harrah's Station Square Casino in Pittsburgh. The projections made by CCA were far greater than made by other analysts for Pittsburgh area casinos. Although not part of the initial report, Harrah's and CCA have since claimed that disparities are a result of the relative quality of the site and operator.

Three alternative sites are being proposed for casino and ancillary development in Pittsburgh, each of which could be the gaming venue of choice for the majority of Pittsburgh area metro residents given the location of other planned and existing gaming venues in the market. The three proposals have relatively similar building programs, and feed off of other tourism generators in the market. Station Square is currently an attraction for tourists, offering broad-scale retail, drinking and dining establishments. The site proposed by Don Barden and Majestic Star is located in close proximity to the outdoor professional sports stadiums, and can benefit from the crossover visitation from those games. The site proposed by Isle of Capri is adjacent to the proposed new Pittsburgh Penguins arena, as well as the convention center and the bulk of downtown hotels.

Each of the three operators has ample experience with relatively large-scale, regional gaming operations. Traffic accessibility is a potentially major issue in Pittsburgh, and the Pittsburgh Gaming Task Force has determined that the Isle of Capri site is optimal from an accessibility standpoint, while the Station Square site is significantly challenged, as there is only one access road with no ability to expand, and there are already congestion problems. As a result, while Isle of Capri and Majestic Star have comparable revenue projections, the disparity projected in the CCA report does not appear to have foundation in fact.

Rather, the calculations and models used by CCA are often times erroneous and at other times highly aggressive. This memorandum provides a review of the analysis provided by CCA, and highlights the calculations and assumptions of suspect accuracy or possibility, and provides for alternative calculations and assumptions that are more supportable by historical industry facts and norms.

The basis for most of the calculations was a modeling of regional per capita expenditures in other gaming markets throughout the U.S., specifically including Atlantic City; Council Bluffs, Iowa; Quad Cities, Iowa/Illinois; Marquette, Iowa; Southern Delaware; Gulfport-Biloxi, Mississippi; Tunica, Mississippi and Vicksburg, Mississippi.

At first glance, the markets considered could be divided into two different market types:

- 1) Large-scale clustered destination: Atlantic City, Tunica and Gulfport-Biloxi; and
- 2) Small-town riverboat markets (as well as rural, southern Delaware)

Pittsburgh is not a reasonable comparison to either market type. Interestingly, urban markets such as Kansas City and St. Louis were omitted from the comparative set, as was the neighboring West Virginia gaming market.

Large scale markets as comps

In large-scale clustered gaming destinations, gaming participation rates are generally far greater than industry averages, as patrons are attracted by a large, frequent number of entertainment events, and marketing efforts of numerous properties. The critical mass of casino and non-gaming amenity offerings make the casino strips popular entertainment destinations. This does not happen in stand-alone casino markets where casinos are not able to enjoy secondary benefits of gamers visiting neighboring properties. The presence of options increases gaming participation rates – an analogy is a multiplex cinema versus a single-screen movie house. Patrons can generally find something of interest when there are many options, but with a single option, some demand will fail to materialize.

One of the other major features of the large-scale clustered destination markets is the low tax rate, below 15% for each of the markets discussed above. In markets of this sort, operators enjoy low tax rates, but generally spend 15% to 25% on marketing, promotions, and other efforts to attract gamers. In a market with an effective tax rate of nearly 50%, the level of marketing will fall far short of a destination casino market. Essentially it is therefore a tradeoff – casinos aim for a reasonable cash flow, and use the balance for marketing efforts; as tax rates increase, the level of marketing expenditures must decline. As there is a direct relationship between marketing efforts and gamer participation, the natural result is that participation rates in markets with high tax rates are lower than those in markets with low tax rates.

The strong marketing effort of the large-scale clustered destination markets is evident in the radius from which they can draw gamers. In the Gulfport-Biloxi market, the busing programs regularly bring in gamers from east coast and Appalachian area metro areas such as Atlanta, Miami, Tampa and Nashville. These markets are well outside of the concentric ring models utilized in CCA's analysis, and therefore calculating average wins per capita based on total win can grossly overstate the per capita averages.

Finally, in terms of large-scale casino market gaming win, the hotel market is a major component of the gaming market potential. A significant percentage of visitors to these markets stay overnight. As a result, the average length of time spent in the casino per visit is considerably longer than for the average local market gamer that makes an impromptu casino visit, as is generally common in more locally-focused markets and casinos in urban areas.

Small riverboat markets as comps

In addition to the large, regional markets that were examined, CCA considered several riverboat markets, predominantly in the Iowa area. Vicksburg, Mississippi and southern Delaware were also considered. Relative to the city of Pittsburgh, these markets are all much smaller in terms of total population, and the lack of alternative entertainment options (i.e. professional sports teams, major concert halls and arenas, etc.) give the casinos little competition for the entertainment dollar.

With the exception of Delaware, these markets are, like the large-scale casinos discussed above, in markets where gaming tax rates are well below what will be paid in

Pennsylvania. The low tax rates allow for high marketing expenditures, which in turn contribute to relatively high gaming expenditures per capita.

Gaming participation

CCA had the opportunity to use the survey completed in 2004 by Harrah's (Harrah's Survey '04 - Profile of the American Casino Gambler) which would have raised a red flag to some of their assumptions, and their use of the above comparisons when considering the Pittsburgh market potential.

The report shows that an estimated 16% of Pittsburgh area residents participate in casino gaming, and make an average of 3 gaming trips per year, resulting in 1.0 million annual gaming trips. CCA projects that over three million gamer visits will accrue to Harrah's alone by the third year of operations, assumed to be the year the market reaches a level of maturity. On page 4 of the CCA report, it is recognized that new properties take several years to mature and that their projections therefore are for a third year of operations, but for the Pittsburgh market it is likely that it may take considerably longer than 3 years to mature, given the low initial participation rates.

The model created by CCA also is based on their assertion that 'distance is the predominant determinant of casino patronage'. Distance is an important factor, but predominance is not accurate. Accessibility takes on many forms, and crow-flies distance does not always paint a complete picture. Travel times, natural barriers, and similar geographic or congestion issues are equally important attributes. Casinos near interstate off-ramps in suburban areas can generally attract a larger percentage of patrons within a 10-mile radius than a downtown area casino can when patrons have to deal with traffic congestion, parking, river crossings and safety concerns. As a result, modeling gamer behavior merely off of door-to-door linear mileage will grossly overstate demand for the facility. CCA accepts this assertion on Page 13 of their report, however it is not evident that they recognize the Station Square site as having any negative attributes with respect to accessibility.

The assertion that proximity is the predominant determinant in casino choice is perhaps true, but not to the degree CCA suggest. Their model would suggest that there is a very high degree of homogeneity between facilities. Gamers develop preferences and enjoy short travel times, but they also enjoy variety. As a result, if one casino is located 2 miles from home and another 5 miles, it is not reasonable to assume that the one 2 miles away would capture 90% of annual casino visits made. These figures are not explicitly used in the CCA report, but it is evident from the estimates that the incumbent operators in West Virginia would lose well over half of their Pennsylvania business as a result of the operation of the new slot facilities. In our opinion, this is not likely to be the result, no matter who is awarded the Pittsburgh license. The high repatriation rate from West Virginia facilities is a necessary assumption in order to attain revenues for a Pittsburgh gaming facility to the degree CCA projects for the Station Square property.

Market comparisons

In addition to the general form of the model, the calculations used to derive market averages are somewhat suspect, and in most cases are mathematically erroneous. In Exhibit A12, the Council Bluffs area is considered. Ten concentric rings around the market center are considered, which reportedly sum to 2.3 million residents. In fact, summing these ten rings amounts to 1.23 million. This type of error is found in all of the Iowa examples.

	Adult Population
0 to 5	108,341
5 to 10	172,179
10 to 20	211,608
20 to 30	40,150
30 to 40	57,887
40 to 50	144,210
50 to 75	193,200
75 to 100	306,893
Total	1,234,468

The actual spending per adult estimated from each market area, based on their math, does not support their estimated spending base of \$756.60, but does support the notion that their methodology is seriously flawed and can not be used as a basis for market comparisons. Consider the following calculations based on the following table, as provided in the CCA report, page 5, Exhibit A12:

	Council Bluffs Adult Population	Competition, Distance and Income Adjustments (CDIA)	Spending (\$ in millions)	Actual Spend per Adult
0 to 5	108,341	83.6%	\$59.0	\$544.58
5 to 10	172,179	57.0%	\$106.8	\$620.02
10 to 20	211,608	60.4%	\$118.0	\$557.58
20 to 30	40,150	26.9%	\$15.1	\$376.11
30 to 40	57,887	4.8%	\$15.6	\$270.35
40 to 50	144,210	3.0%	\$34.2	\$237.20
50 to 75	193,200	8.3%	\$25.5	\$131.81
75 to 100	306,893	4.5%	\$6.7	\$21.76
Outside of Market			\$7.6	
Total	1,234,468		\$388.4	

If the column "Competition, Distance, and Income Adjustments" (CDIA) is correct, the calculation of Actual Spend per Adult would be wrong based on the \$756.60 figure, given that the adjustment for the 0-5 ring should provide for a higher spend per adult than the 5 to 10-mile ring or the 10 to 20-mile ring, and the 50 to 75-mile ring should provide for a higher spend per adult than the 40 to 50-mile ring. A corrected table, based on a \$756.60 expenditure base would result in a total gaming win of \$275 million, well below the market's performance, and a \$1,050 spend per adult would be needed to replicate the model. However, the \$1,050 expenditure per adult spending base is probably not a realistic estimate either. The problem lies in the CDIA column, where the model calibration occurs. The friction of distance is far too heavily weighted as evident from the dropoff in CDIA from the 10-20 mile ring to the 30-40 mile ring. If the dropoff was less steep, as should be the case given the limited competitiveness of the regional market, a significantly lower spend per adult could be utilized as a base. The more competitive markets in eastern Iowa were calculated as having a far less steep dropoff as distance increased. If CDIA factors similar to Dubuque are considered, a spending base of \$725 could be assumed.

In the Dubuque market, seven concentric rings are analyzed (with a notable omission of the 0-5 mile area?), with the populations summing to 1.05 million (in the report CCA incorrectly suggests that the total sums to 7.6 million). The inconsistencies in the Dubuque model are not as blatant as the Council Bluffs model; however, the math does not compute as reported. The table would be correct if the spending base was \$629, not \$655.

As noted above, considering the Council Bluffs market relative to Dubuque, it is not clear why there would be a sharper dropoff in the CDIA in Council Bluffs as distance from the market center increases, as the level of competition for the Council Bluffs market from other gaming markets is minimal, as compared to Dubuque's competition from Quad Cities and Marquette.

Lake Charles is just an example of where the Harrah's brand does not rule the market, and not an exception. There are some markets where the Harrah's brand does relatively well, such as Atlantic City, North Kansas City, and Joliet, Illinois, and markets where Harrah's acquisition of Horseshoe has provided them with market-leading properties, such as Shreveport. But in other head-to-head markets, Harrah's has also been outperformed. In Council Bluffs, Harrah's competes against the Ameristar II. In 2005 Ameristar generated \$187 million in gaming win from 1,802 gaming positions, or \$284 per position per day. Harrah's Kanesville Queen generated \$121 million from its 1,439 gaming positions, or \$231 per position per day. The year 2005 was not an outlier, as the Harrah's property attained its highest annual win per position total that year, having not previously exceeded \$215 per position on an annual basis. 2005 was also the best year for Ameristar, but the property has attained a win per position of at least \$224 per day since 2002. As a result, it is recognized that Harrah's has a strong, recognized brand, but there is no validity in assuming that the brand could generate a significant premium to fair share if and when it enters the market.



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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:

Barbara Fulmer

Address:

Telephone:

Organization, if any:

Employer:

Timothy R. Fulmer & Associates

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

I hear so much in the news about how the "fix is in" for the Pittsburgh slots license to go to Forest City. I am very distressed by this. The silence of local officials speaks volumes. I urge you to not allow this to happen. Station Square is the worst possible location unless you expect people to arrive by boat. I think it makes sense to consider proximity to the convention center as well as traffic & development issues.

I am a hockey season ticket holder. I come into the city from Indiana County with my family to eat in Allegheny county restaurants and buy Penguin merchandise at least 43 days a year. Otherwise I rarely come to the city. We have met so many people at the games who are from other parts of the state, country & world! It would seem the Penguins are a perfect draw to bring dollars from outside Allegheny County to a casino and guarantee a better ratio of tax dollars being drawn in from outside the county. A casino in Station Square is not going to draw people from other areas when casinos exist in so many other places already. But combine the slots with a hockey team that is already drawing people from far away and you have a win-win situation.



**Pennsylvania
Gaming Control Board**



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MAY 24 200
Board Clerk P

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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: MICHAEL T. IRR

Address:

Telephc

Organization, if any: None

Employer: Retired

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

The Board should be aware that a Pittsburgh casino at Station Square or along the North Shore would probably never be accepted by large factions of the regional population if either location gets the slots license and it is perceived to be a major factor in the loss of one of our beloved sports teams and civic institutions, the Penguins. There would likely be much outrage and bitterness that would be reflected in discussions on local talk shows for a long time. The furor and hatred might never completely subside (much like the uproar over the taking of land for the current arena has never fully subsided after nearly 50 years). There could be an organized or suggested boycott or even picketing of the despised casino. Regardless, the lingering anger might affect their bottom line, perhaps significantly. The ongoing discord over this issue could be a distraction and detriment to the region advancing on other issues. Personally, I am declaring that I would never patronize the city casino if we lose the Penguins. I would expect that many thousands of others would become similarly motivated.

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

Michael T. Irr

FILED

MAY - 4 2006

Board Clerk PGCB



Pennsylvania Gaming Control Board



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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: Margaret A. Vonken

Address: _____

Telephone: _____

Organization, if any: _____

Employer: _____

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

April 24, 2006

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

RE: Station Square

Dear PGCB,

I wanted to write to you to tell you about my recent experience this past weekend at Station Square. My twin sister and I chose to celebrate our birthday at a local bar/club in Station Square. In an effort to be responsible, since we knew we would be consuming alcoholic beverages, we decided to 'cab it' with a few friends.

Upon arriving at Station Square Saturday night, the traffic was out of control. The entrance to the clubs and bar areas were so backed up that my party and I were forced to get out of the taxi early. The cab driver dropped us off at the Exxon Station and had us walk the remaining distance to the club (*in heels*) since he did not want to wait in the 50+ car line to get into the parking area.

At the end of the night, I asked a policeman where to stand to hail a taxi for our return trip. He directed me to a certain corner close to the Smithfield Bridge and East Carson Street, and wished me good luck. Well, I soon realized why he wished me luck since no cab would stop for the rare few that did pass by. I called Yellow Cab three times and each time they said they would be sending someone but no one ever showed up. I was still standing outside with my friends 45 minutes later until we finally decided call a friend to come and get us.

Trying to go out in Station Square, which deems itself as 'Pittsburgh's premiere regional draw,' was a nightmare. If 2.2 million people supposedly go to Station Square per year, I don't understand how the public transportation is so deficient that we cannot get a cab home. I cannot believe that this site is even considering a casino in that already crowded section of town. Station Square can't possibly handle 2.2 million people.

I urge you to reconsider putting a casino at this already packed and lacking location. The site can't even control traffic and transportation now, how will this improve with a casino?

Stranded at Station Square,

Margaret A. Volkov
Aspinwall, PA



Pennsylvania Gaming Control Board



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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 slots operators:

Name: REGIS J. SCHNIPPERT

Address: _____

Telephone: _____

Organization, if any: _____

Employer: OFFICE OF ATTORNEY GENERAL

COMMENTS: (Please use reverse side if more space is required)

MY COMMENTS ARE ON THE REVERSE SIDE.

As a 25-year resident of Pittsburgh's South Side, I oppose vehemently the awarding of a slots license to Harrah's/Forest City Enterprises because their proposed Station Square development will exacerbate the nearly intolerable parking and traffic problems for adjacent South Side residents and businesses.

As Steeler's Hall of Fame Coach Chuck Noll might say about the South Side traffic and parking situation: "The problems are great and they are many!" The South Side is a very high density neighborhood of mixed residential, commercial, and industrial uses, with literally dozens of restaurants and taverns that are well patronized. The only highway running east from Station Square through the South Side is State Route 837, East Carson Street, which is single lane in each direction, has parking on one or both sides, and has traffic lights at nearly every intersection. Traffic on East Carson becomes backed up to a crawl on weekdays at lunchtime, evening rush hour, and for Steeler games and other City events. On weekend nights, the street and sidewalks resemble a carnival midway. ~~The side streets are even narrower, with parking on one or both sides. There is~~ simply no more space for any more traffic.

Harrah's Transportation Analysis uses a ridiculously low estimate of the percentage of casino patrons who will use East Carson Street (6%), it grossly overestimates the percentage of patrons who will use public transportation (33%), and overestimates the average vehicle occupancy (4). If Harrah's numbers are even slightly off, it would mean that an additional 200 cars could be using East Carson during peak hours. At the public hearing held by the Pittsburgh Gaming Task Force, an independent traffic engineer testified that the proposed Station Square casino has the potential to "blow up" traffic congestion on the South Side. The Task Force Report, which endorses Harrah's proposal, admits that it has serious unaddressed consequences for traffic on the South Side.

The parking situation on the South Side is at least as serious as the traffic problem. Because there are few surface lots and no parking garages, residents, business employees and patrons, and nightly restaurant patrons and revelers all compete for the limited street spaces. Additionally, there are literally hundreds of daily commuters who park on the South Side and walk or take the bus downtown to work. City officials have said that they have no money to enforce residential permit parking programs. Harrah's proposes a net gain of only 1700 parking spaces to accommodate up to 40,000 patrons, hundreds of employees, and 1,500 condo units. That is absurd. Their study also ignores the displacement of 1200 daily commuters who currently park at Station Square and walk to downtown, as well as commuters who currently park along East Carson. At a community meeting, the Harrah's representative addressed this problem by saying: "Let them find somewhere else to park!" He had no concern that many of these displaced parkers will be looking to park on the South Side.

This Board cannot allow Harrah's to continue to ignore its duty under the Gaming Law to ameliorate the tremendously adverse impact their development will have on the adjacent South Side neighborhood.

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

