



To Public Hearing
Date: <u>MARCH 19, 2012</u>
Item # <u>8</u>
Re: <u>Tu 11-595782</u>
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# GREAT CANADIAN GAMING CORPORATION

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## Schedule 16 to the Minutes of the Council Meeting for Public Hearing held on Monday, March 19, 2012.

March 17, 2012

Mayor/Councillors  
City of Richmond  
6911 Road No. 3 Road  
Richmond, BC V6Y 2C1

**BY EMAIL**

Dear Mayor/Councillors:

We felt compelled to submit this letter to you in light of the decision you will be making on March 19<sup>th</sup> related to the Night Market application from Firework Productions Ltd.

Over the last two months we have worked with the Night Market proponent and City staff to address, clarify and mitigate our concerns and the potential impact the Night Market operation may have on the River Rock Casino, and we are gratified that much progress has been made in that regard. However, despite all the tactical commitments agreed upon to alleviate traffic and congestion, it is only logical to assume that there will be some impact on River Rock's existing business- and its continued growth pattern- by more than doubling the number of visitors in this area of the immediate neighbourhood. That is the risk we all take should this application be endorsed.

We recognize the fact that the operating permit proposed for the Night Market is stringent and is structured in such a way that allows for flexibility should the need arise. However, our fundamental difficulty with such prescriptive "check box" management is that it is not outcome-based; in other words, the proponent could comply with all of the conditions mandated by the City and there still could be a negative impact on the business conducted at River Rock. And as a key financial stakeholder in the River Rock operation, that's obviously not an impact the City wants to experience. We feel strongly that by not employing a more comprehensive outcomes-based approach, the City risks handcuffing itself to three years of the operation and restricting its ability to effectively protect its significant interest in the River Rock operation.

By no means will we proclaim to deserve a monopoly on business activity in this neighbourhood, but we must underscore that we have invested literally tens of millions to ensure adequate parking facilities as well as upgrades to the surrounding road network. We welcome synergistic and complementary growth



in the area, like what is proposed for longer term on Duck Island, but we maintain our belief that an event-based business like the proposed Night Market will overwhelm the existing infrastructure.

We're proud of the fact that River Rock has realized revenue growth in recent years, despite macro-economic concerns and a mature gaming marketplace in BC. We're also proud of, and grateful for, the partnership we have been afforded with the City of Richmond. And it is our belief that River Rock is the envy of some other municipalities because of the significance of the impact it has on Richmond's municipal finances. We respectfully suggest there is risk to the continued growth of that revenue stream and that none of the stakeholders- River Rock, the Night Market proponent, or the City- can effectively control potential impacts by adopting the proposed approach.

We respect the right of your Council to decide what is the appropriate land use within the City of Richmond, including our immediate neighbourhood; however, we also implore you to consider further assurances that will provide us some certainty that our existing business will not be subject to any unintended consequences associated with the Night Market's operation.

We readily concede that no one- including ourselves- can accurately predict what impact, if any, the Night Market operation will have on River Rock and the immediate neighbourhood. But it is for this exact reason we do not agree with a three year operating permit subject to certain conditions without any consideration for outcomes and impacts.

We sincerely hope we are proven wrong by City representatives and the Night Market proponent as it relates to these concerns.

Sincerely,

**GREAT CANADIAN GAMING CORPORATION**



Peter Goudron  
Senior Vice President, Operations- West