



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

July 11, 2020

Josh Hirsberg  
Executive Vice President, Chief Financial Officer and Treasurer  
Boyd Gaming Corporation  
3883 Howard Hughes Parkway, Ninth Floor  
Las Vegas, Nevada, 89169

**Re: Boyd Gaming Corporation**  
**Registration Statement on Form S-4**  
**Filed July 2, 2020**  
**File No. 333-239624**

Dear Mr. Hirsberg:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Ronald (Ron) Alper at 202-551-3329 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction

cc: Senet Bischoff