



**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: Julie M. Camburn

Address: _____

Telephone: _____

Organization, if any: East Falls Business Association

Employer: self-employed

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

See attached letter, dated 05/31/06

EAST FALLS

B u s i n e s s A s s o c i a t i o n

May 31, 2006

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

RE: Category 2 license application submitted by Keystone Partnership LLC on behalf of Trump Entertainment Resorts, Inc.

Dear Mr. Decker and PGCB Members:

The membership of the East Falls Business Association strongly urges you to reject the application of Keystone Partnership ("Trump") for a Category 2 gaming license in Pennsylvania.

Any gaming facility at that location will be detrimental to the types of businesses—corner food markets, hair/nail salons, pizzerias and small eateries—found in the adjacent area. These are small businesses, many "mom and pop" types, which depend on the patronage of local residents to sustain them.

A "convenience" casino draws its largest number of clientele from the local community. *"New" money will not be coming into a casino located at the Budd Commerce Center; it will be "redistributed" cash, siphoned from local businesses, primarily dependent on local residents.* Eventually, small businesses around a convenience casino close, their cash flow replaced by pawn shops and strip joints. Do not let this be the legacy you place on five communities in Philadelphia which are already working closely, sharing the burden of providing much-needed resources, and speaking out for those who live here.

In order to be successful—that is revenue-producing—casinos in Pennsylvania should be placed in entertainment venues, with tourism, trendy shops and fine eating establishments to entice the type of gambler who will visit, stay, spend, leave and return again. This cannot happen in a casino surrounded by residential communities with no synergy to entice the gaming public.

A casino should not be built at the proposed TrumpStreet site, Henry and Roberts Avenues, butting against a vocational high school. No gaming facility should be located across a 30' roadway from the entrance to a low income housing development, and ¼ mile from a community of single family homes, schools, churches and a major university.

The EFBA is a member of the Multi-Community Alliance (MCA) and supports its stance of opposition to the Trump proposal. After spending several months of long and laborious evening meetings to negotiate a Community Benefits Agreement (CBA), should the Trump team be granted a license, the MCA was informed by Robert Pickus, VP of Trump Entertainment, that he would no longer negotiate with the MCA because it would not support the Trump proposal. Only one of the 26 MCA organizations agreed not to oppose Trump and to sign a letter of support—an organization with the fewest constituents within the one mile impacted area. Trump has attempted to portray that group, Tioga United, as representative of all the impacted communities, but it does not. *The MCA's community surveys, petitions and meetings show there is minimal support for any Trump proposal in the surrounding neighborhoods.*

A casino at Roberts and Henry Avenues will not drive economic development. At least three local CDCs have plans in progress or in place to spur economic development in the neighboring communities. A casino at Henry and Roberts Avenues will negatively impact those plans and should not be considered.

In addition, Trump now says it has withdrawn its original plan, but has not given the MCA membership an opportunity to review the new proposal.

Please reject the Keystone/Trump application. *Its revenue projections are among the lowest of the five proposed Philadelphia casinos; its job opportunities the fewest; its likelihood of success, nil.* As noted when it reneged on its proposal to build a casino in French Lick, Indiana, the Trump team needs to concentrate its money on its Atlantic City casinos, which are deteriorating, both financially and physically. When it debt, the history of this organization and its various teams has been to reorganize by declaring bankruptcy. The last bankruptcy Trump declared put 137 small businesses under as well. Trump was freed of \$400 million in debt; what happened to the debts of the other 137 small businesses dependent on the Trump casino?

The value of the chosen developers/operators for the first group of casinos in Pennsylvania will determine the future of our Commonwealth for many years. Don't let one bad egg ruin the entire basket.

New Jersey gets 9.5% of its casinos' revenue; Pennsylvania will extract 34%. Is there any reason Trump will place more than a minimum effort on its Philadelphia facility? None noted.

Say "NO" to Trump!

Sincerely,



Julie M. Camburn
President



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: Robert A. & Julie M. Camburn

Address: _____

Telephone: _____

Organization, if any: _____

Employer: RETIRED & SELF-EMPLOYED

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

See attached letter, date 05/31/06

ROBERT A. & JULIE M. CAMBURN

May 31, 2006

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

Dear Mr. Decker and PGCB Members:

As you weigh the merits of casino developers to fulfill the requirements of the mandate given you by the Commonwealth's legislature, we ask that you pay particular attention to those entities which tend to use the "letter of the law" to avoid certain disclosures.

Re: Keystone Redevelopment application on behalf of Trump Entertainment Resorts

We, as life long residents of the state of Pennsylvania and 31 year homeowners in the East Falls community of Philadelphia, we ask you to consider these two PGCB regulations:

§ 441.4. Slot machine license application

14) *The details of any gaming, slot machine or casino license applied for by, or granted or denied to, the applicant or an affiliate, intermediary, subsidiary or holding company in any other jurisdiction and an executed consent for the Board to acquire copies of applications, licenses and related information from the other jurisdiction.*

(30) *The record of the applicant and its developer in meeting commitments to local agencies, community-based organizations and employees in other locations.*

In March of 2005, the Trump organization, then known as Trump Hotel Resorts and Casino (THRC), reneged on its proposal to the state of Indiana to build a casino in the community of French Lick, IN. THRC was also \$18 million in arrears on its taxes to Indiana. It may not have divulged this information to the PGCB in its application, however, as Trump Resorts had declared bankruptcy in November 2004 and changed its name, possibly avoiding that requirement. Additionally, THRC litigated Indiana's analysis of its debt and lost. Was this included in all divulgements of its background? Did the Keystone application ignore it, as the name had been changed for the THRC bankruptcy and reorganization?

An article in *The Cincinnati Post*, March 2, 2005, explains:

Ernest Yelton, executive director of the Indiana Gaming Commission, said talks had ended with Donald Trump's casino company, after newly-minted Gov. Mitch Daniels--taking the state's reins in January--ordered a review of the matter. Yelton said the resort chain's officials told him the company had abandoned the project in French Lick, some two-score miles south of Bloomington. Trump Hotels execs cited a recent state tax court decision that the company owed Indiana \$18 million in back taxes for its casino along Lake Michigan in Gary, as well as the potential expansion of gambling elsewhere in the state. With 10 wagering houses already operating in Indiana, the as-yet-unbuilt casino in question would make lucky No. 11 for the state sandwiched between Ohio, Kentucky, Illinois and Michigan. "The financial prospects for a casino in French Lick have changed since the time we were awarded the project," Trump Hotels President Scott Butera said in a statement. "The tax burdens have become more onerous, and the proposition for additional gaming facilities in Indiana appears eminent."

A contract between Trump and the state, however, had not been finalized and doubts about whether the company could carry out its \$108 million development plan had been raised since it filed for bankruptcy protection in November. A Trump attorney had said at that time that the company planned for the casino to open in early 2006.

If the tax burden in Indiana had become burdensome, consider what could happen here in Pennsylvania, where the State's portion of casino revenues is so much larger. And, whoever runs from competition? The Trump team is not a stable entity; please do not consider its proposal. It may have a new name, but executives in charge are from the former regime and will follow the same practices.

Part 2 of our concerns:

§ 443.4. Category 2 slot machine licenses.

(a) *To be eligible to apply for a Category 2 slot machine license, an applicant shall comply with Chapter 441 (relating to slot machine licenses) and submit the following:*

(3) *A statement detailing and establishing that the proposed location is in a revenue or tourism-enhanced location and is in compliance with the geographical requirements of section 1304(b) of the act (relating to Category 2 slot machine license). The statement must include the appropriate business and tourism studies, economic impact studies, projected revenue and business plans.*

By no stretch of the imagination is the corner of Henry and Roberts Avenue a revenue or tourism-enhanced location. In fact, one would be hard-pressed to find much to compel tourists to leave historic center city Philadelphia, and trudge out to a spot at the edge of North Philadelphia, on a traffic-congested highway to the 'burbs.

The Keystone/Trump application could not have included tourism studies, as, aside from tours of Laurel Hill Cemetery, and an interest in the diversity of residential architecture, there is no tourism.

Additionally, the TrumpStreet proposal is actually "Plan B" for the Budd Commerce Center. A strong marketing plan by the developer (PREI) has already brought significant stakeholders to the site: Temple University Health System has leased over 28,000sf for its administrative offices—a \$40 million investment; M Management purchased 250,000sf for its electronic and paper file storage warehousing—a \$10 million investment. Fresnius Medical Care's \$5 million investment for 30,000sf of space will house a dialysis treatment facility; the Salvation Army, with a \$30 million grant from the Ray & Joan Croc Foundation is building a facility with multiple recreational, educational and community uses. Add to that a supermarket and apartment complex, and the Budd Commerce Center is already boosting the local economy—no casino needed.

The added traffic burden—6,000,000 vehicles annually—will overwhelm residential streets with the overflow of casino-bound traffic. The Trump plan makes no realistic attempt to mitigate traffic concerns, let alone pay for it. Is it reasonable to expect the State and/or PennDOT to do so?

A casino at this proposed site will change forever the character of five communities and the lives of the 25,000+ people who live here, to their detriment. Thank you for your consideration of our concerns.

Sincerely,



Robert A. Camburn



Julie M. Camburn

Dr. David M. Wootton

Re: Application of Keystone/Trump for slots parlor in East Falls

Dear Pennsylvania Gaming Commission

It is my belief that the Trump/Keystone team does not fulfill the criteria to be granted a Pennsylvania Gaming License for a slots casino. I live in East Falls. The proposed Slots Casino will be a detriment to this wonderful neighborhood.

1. Revenues promised by the proposed Slots Casino at the Budd site are not the highest of the proposals for Philadelphia. In its own impact study, Trump lists \$196.3 million in annual tax revenue for 3,000 slot machines, compared with \$200 million at Pinnacle and \$218.5 million at SugarHouse.
2. The Trump/Keystone team is less financial fit than other teams. The Trump/Keystone team has questionable integrity as compared to other teams proposing slots casinos in Philadelphia. The Board needs to consider the financial capacity, stability, integrity (including personal bankruptcies), responsibility, and, most importantly, operational viability, of each casino applicant.
3. The promise of jobs is one of the positive elements that will impact the city of Philadelphia. Trump is the LOWEST proposal on job creation. Each of the other four applicants in Philadelphia exceeds the Trump organization in its proposal to the Gaming Control Board. Trump projects only 905 full-time-equivalent jobs, while other developments project between 1,000 and 1,700 jobs.
4. The Facility and Design will not provide benefit to the community to offset the negative impact of additional 24/7 activity and traffic volume. At the May 24, 2006 Design Forum hosted by the Daily News Trump / Keystone representatives did not show a design. Instead, they stated that they were going to be honest about being a casino. TrumpStreet will not be an ice rink or a movie theater. They will not be looking to create anything but what they are - a slots casino. The team cited redesign as the reason they did not present a design at the forum. One week from the deadline for public comment on the casino proposal no one in the community knows what is being proposed for the TrumpStreet Slots Casino.
5. The Trump team is lying to the media and politicians about community support. While Trump has stated that the community has "embraced" him, most of the neighborhoods around the site have voted opposition in community meetings. In the latest poll taken on primary election day, the 38th Ward reports



**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: _____

DAVID WOOTTON

Address: _____

Telephone: _____

Organization, if any: _____

Employer: _____

DREXEL U

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

Please see attached
letter

Comments: Page 2 (continued)

*see attached
letter*

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

David Wootton

that 63% of people were opposed to the slots parlor, and an even higher percentage were opposed in the primarily African-American districts in North Philadelphia. The Trump group is painting their opposition, as a racially divided wealthy against poor, but the only divisions being shown are the divisive tactics being used to divide the neighborhoods from each other by the Trump team.

I urge you to reject the Trump/Keystone team's application for a gaming license. Given that the State has determined that Gaming is coming to Pennsylvania and the City of Philadelphia, licenses should be granted to the entities that will most reliably provide the greatest revenues with the least detriment with the greatest mitigating benefits to the communities surrounding the casino site. After careful consideration of the facts it is clear that Trump/Keystone team does not fit the criteria.

Sincerely,


David Woodton



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: JOE DURRANCE

Address: _____

Telephone: _____

Organization, if any: _____

Employer: _____

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

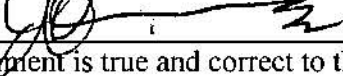
I would like to urge the Pennsylvania Gaming board to reject the Trump/Keystone application for a casino at the "Budd" site in East Falls/Mice section of Philadelphia.

The Casino will bring a negative impact to our community. Our residential neighborhood is not the ideal location. The increased traffic will negatively effect the quality of life.

Other proposed casinos have shown to be in better locations that are better suited, and proven to produce more revenue for the state. Trump falls behind the Pinnacle and Sugar House in that aspect. Please do not award

Comments: Page 2 (continued)

Please consider the signatures of
my concerned neighbors which are
included in this letter.

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

NO CASINO HERE

I AM STRONGLY OPPOSED TO A SLOTS PARLOR AT THE BUDD PLANT SITE BECAUSE:

Traffic: Philadelphia's *Mayor's Task Force Report of Findings* shows an increase of up to 233% on adjacent streets. The present state of local street and highway traffic—congestion on I-76 and Route 1's jammed ramps—will only add to the heavy traffic on Henry Avenue. People are already regularly injured and killed along this congested and overloaded major commuter route.

Crime & Social Problems: The increased crime in casino areas will cost our neighborhoods, families, schools, children and institutions dearly; additionally, studies link casinos to increased social problems—addiction, financial decline, family neglect, etc.

Anti-Community: We do not want all the planning and Economic Development initiatives already underway by our Multi-Community Alliance members to be shoved aside to become the next depressed Atlantic City style community. We live in family friendly neighborhoods. A casino will not add to our quality of life. We want to maintain and grow a family-friendly, independently-owned business community.

PLEASE PRINT REQUESTED INFORMATION, THEN ADD YOUR SIGNATURE. THANK YOU.

NAME ADDRESS/ZIP CODE PHONE

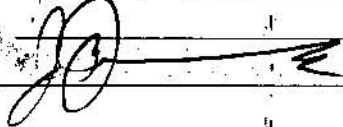
1) Kevin Cassidy

Signature 

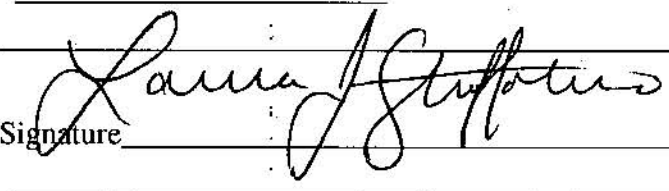
2) Mr. Abramson

Signature _____

3) Joe Durance



4) Laura J. Stoffolino

Signature 

NO CASINO HERE

I AM STRONGLY OPPOSED TO A SLOTS PARLOR AT THE BUDD PLANT SITE BECAUSE:

Traffic: Philadelphia's *Mayor's Task Force Report of Findings* shows an increase of up to 233% on adjacent streets. The present state of local street and highway traffic—congestion on I-76 and Route 1's jammed ramps—will only add to the heavy traffic on Henry Avenue. People are already regularly injured and killed along this congested and overloaded major commuter route.

Crime & Social Problems: The increased crime in casino areas will cost our neighborhoods, families, schools, children and institutions dearly; additionally, studies link casinos to increased social problems—addiction, financial decline, family neglect, etc.

Anti-Community: We do not want all the planning and Economic Development initiatives already underway by our Multi-Community Alliance members to be shoved aside to become the next depressed Atlantic City style community. We live in family friendly neighborhoods. A casino will not add to our quality of life. We want to maintain and grow a family-friendly, independently-owned business community.

PLEASE PRINT REQUESTED INFORMATION, THEN ADD YOUR SIGNATURE. THANK YOU.

NAME ADDRESS/ZIP CODE PHONE

1) Robert D. Gaul

Signature [Handwritten Signature]
2) JULIE CELANO

Signature [Handwritten Signature]

3) Signature GEORGE A. JONES

4) Signature [Handwritten Signature]

NO CASINO HERE

I AM STRONGLY OPPOSED TO A SLOTS PARLOR AT THE BUDD PLANT SITE BECAUSE:

Traffic: Philadelphia's *Mayor's Task Force Report of Findings* shows an increase of up to 233% on adjacent streets. The present state of local street and highway traffic—congestion on I-76 and Route 1's jammed ramps—will only add to the heavy traffic on Henry Avenue. People are already regularly injured and killed along this congested and overloaded major commuter route.

Crime & Social Problems: The increased crime in casino areas will cost our neighborhoods, families, schools, children and institutions dearly; additionally, studies link casinos to increased social problems—addiction, financial decline, family neglect, etc.

Anti-Community: We do not want all the planning and Economic Development initiatives already underway by our Multi-Community Alliance members to be shoved aside to become the next depressed Atlantic City style community. We live in family friendly neighborhoods. A casino will not add to our quality of life. We want to maintain and grow a family-friendly, independently-owned business community.

PLEASE PRINT REQUESTED INFORMATION, THEN ADD YOUR SIGNATURE. THANK YOU.

① NAME ADDRESS/ZIP CODE PHONE

DEBORAH KAPLAN March 13
W. Kaplan

Signature W. Kaplan

②

Signature [Signature]

③

Signature [Signature]

④ John Kormanick
2819 M. Vale

[Signature]

Signature [Signature]

32BJ



SEIU

Stronger Together

SERVICE EMPLOYEES
INTERNATIONAL UNION
CLC

MICHAEL P. FISHMAN
President

KEVIN J. DOYLE
Executive Vice President

HÉCTOR J. FIGUEROA
Secretary-Treasurer

KYLE BRAGG
Vice President

LENORE FRIEDLAENDER
Vice President

BRIAN LAMBERT
Vice President

VALERIE LONG
Vice President

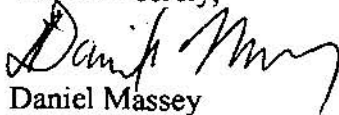
KRYSTYNA ROSARIO
Secretary

June 1, 2006

To Whom it May Concern:

I respectfully submit the enclosed report on behalf of SEIU 32BJ's 5,000 members in the Philadelphia area. 32BJ would like the report to be included in the public record on the TrumpStreet casino application. Thank you for your consideration.

Yours sincerely,



Daniel Massey
Communications Coordinator

Brian Ketcham Engineering, P.C.

Engineering Analysis of the Traffic Impact Study
for the Trump Casino at the Former Budd Plant Site, City of Philadelphia
prepared by Vollmer Associates, December 2005

Analysis prepared by Brian T. Ketcham, P.E., May 30, 2006

Trump Hotel and Casino Resorts (the Trump organization) is proposing to build a 5,000 slot machine casino at the old Budd Plant in Philadelphia County along with a Hotel, many restaurants and other supporting services. The area is part of a huge, largely abandoned industrial area surrounded by residential communities of diverse income levels. Brian Ketcham Engineering, P.C. has been retained by LOCAL 32BJ Service Employees International Union (SEIU) to review the project and its traffic analysis and report on the adequacy of the analysis and how this project will impact the community. The following summarizes our findings. The full report follows.

1. The Trump Casino traffic study must be redone to account for the various errors and omissions listed in this report including inconsistencies with the Philadelphia Gaming Advisory Task Force report and the failure to produce the Task Force's recommended comprehensive transportation and parking study.¹
2. The traffic analysis must address 24-hour operation and the issues raised by the Gaming Advisory Task Force about the concentration of activities during Fridays, Saturdays and Sundays. In addition, the traffic report must address the real peak traffic period, 7 p.m. to 10 p.m. on weekend nights when heavy casino traffic will be moving along nearby residential streets when pedestrians are likely to be using these streets and there is a high local demand for parking.
3. The traffic analysis must address the impact of casino traffic along Route 1 and Interstate 76. While the existing report defacto acknowledges spillback effects on the highways by offering conceptual "mitigation," no quantitative traffic analysis is provided in the Trump traffic report for Route 1 and Interstate 76 and their on and off-ramps. Indeed, it is disingenuous to focus all attention on nearby roads when the real traffic impacts are along Route 1 and Interstate 76 to the south.
4. In fact, no action should be taken on project approval until a thorough examination of the Synchro traffic simulation model prepared as part of the Trump Casino traffic report has been examined, checked for input assumptions, and expanded to include Route 1 and Interstate 76 and their exit and entrance ramps. City and State officials should send the Trump organization and its engineers back to the drawing board to redraft the scope of a comprehensive transportation and parking management plan with affected communities and agencies, provide that all data and

¹ "Final Report," Philadelphia Gaming Advisory Task Force, October 27, 2005 plus the separate "Executive Summary" for The Final Report.

assumptions be scrutinized with professional assistance, and ensure that all mitigation be demonstrated in transparent analyses to be effective and realistic.

5. Incredibly, in spite of the Task Force requesting the casino developer to produce a Parking Management Plan, including nighttime enforcement of a residential parking permit program, the Trump organization failed to analyze parking demands for the project, providing a parking accumulation study of off and on-street use on peak days.

6. Ignored completely are the road safety issues arising from the addition 5 to 6 million additional vehicular trips annually in and near the Trump Casino site. Traffic safety in general (including along Route 1 and Interstate 76) needs to be addressed as well as the impacts of new traffic on the number and cost of added traffic accidents. As the following report demonstrates, these are not inconsequential impacts.

7. The decision making process by which this project will be approved must consider and mitigate the societal costs associated with the 43 million miles of new traffic that this project will add to the area within an approximately 15-mile catchment radius. This is based on 5.4 million annual trips, averaging 8 miles per trip, generated by the casino. These costs will total nearly \$40 million annually. They are real; they are very significant; and most will be borne by the people who live and work within the catchment area for this casino project. The societal costs of the Trump facility alone will outweigh the wage cut tax benefits by a factor of four. There is a need (called for by the Task Force²) to account for these costs and to mitigate them with appropriate fees paid by the casino owner/operator.

8. The Trump organization should adopt the recommendations for transportation improvements proposed by the Philadelphia Gaming Advisory Task Force summarized below.

9. On the basis of my analysis, it is clear the traffic analysis for the Trump Casino at the Budd site is unclear, incomplete, and inconsistent with the Task Force reports, fails to report on critical issues, such as the impact along Route 1 or Interstate 76 or for the real peak hours from 7 p.m. to 10 p.m. and it decidedly fails to fulfill the Task Force's expectations for a comprehensive transportation and parking management plan.

10. The common sense conclusion is to go back to the drawing board, redo the analysis addressing the issues raised herein, and provide proper mitigation for each and every impact. Only once a proper traffic analysis consistent with the Philadelphia Gaming Advisory Task Force report is prepared with involvement of the community can the public make an informed decision whether or not they want this project.

² Philadelphia Gaming Advisory Task Force report, p. 12.

THE PROJECT

The project that is under review, the Trump Casino proposed by Trump Hotel and Casino Resorts, is not the typical gambling casino that one finds in Atlantic City or Las Vegas. It is a building (or set of buildings) with 5,000 slot machines accompanied by restaurants, a hotel and other supporting activities. According to the Philadelphia Gaming Advisory Task Force, an organization specifically assembled to review the costs and benefits of such a casino in Philadelphia, the Trump Casino can expect approximately 6 million visitors a year.³ At 2 people per car average, that is 6 million car trips, 3 million to the site and 3 million leaving, every year. Travel to and from the site by car could be more or less depending on how successful the Trump Casino proves to be and how many patrons and workers use mass transit. Plus, this estimate does not account for employee trips (1,500 employees making approximately 3,500 trips per day), 60% of whom will likely drive. Of this amount, 22% will occur on Saturdays, 18% on Fridays.⁴ This works out to approximately 25,400 cars entering or leaving the area on Saturdays and approximately 20,800 on Fridays (plus employee trips).

Except for Fox Street, the roads surrounding the old Budd site are wide and can likely accommodate the project's traffic. The Trump Organization has only analyzed nearby local roads. However, half the project's traffic will get to and from the site via Route 1; and half of this (25%) via Interstate 76. And, therein, lies the problem. Both are currently at capacity during peak commuter hours. Adding thousands more cars and trucks to these roads during peak periods will further slow the tens of thousands of motorists already using these roads. These impacts are completely ignored in the Trump Casino traffic analysis. They and other pertinent issues are discussed below. In addition, we provide a list of actions that must be taken before any action is taken on this project.

ANALYSIS OF THE PROJECT'S TRAFFIC IMPACT⁵

The Trump analysis is largely based on "professional judgment" or best guesses by Trump's consultants, Vollmer Associates, a prominent traffic engineering firm. Project impacts are dependent on estimates of the number of trips this project will generate plus the assignment of trips to the surrounding roadway network. Without any empirical basis for trip generation, origin and destination and daily trip patterns for the current traffic analysis, the Trump organization needs to go back to the drawing board, secure real operating characteristics for a couple of existing casinos and redo the analysis.

Since the Institute of Transportation Engineers (ITE) does not report on "casinos" of the scale proposed by the Trump organization, Trump's consultant decided to estimate project impacts based on, at best, guesswork. However, ITE recommends, for situations like this one, to go into the field and survey existing casinos. Surely something like this exists elsewhere in America. Doesn't the Trump organization own casinos in Atlantic City where characteristic of slot game users could be documented? Without valid, field checked data, we are forced to take the consultant's word, their "professional judgment".

³ Executive Summary to The Final Report submitted to the Philadelphia Gaming Advisory Task Force, October 27, 2005, Table 2: Annual Revenue Projections by Scenario, page 16.

⁴ Ibid., Graph 1: Percent of Weekly Attendance, page 12.

⁵ Appendix 1 contains details regarding errors and omissions found in the Trump Casino traffic analysis. They are just examples of what we found in reviewing this report.

In contrast to the Trump approach of basing their traffic analysis on "professional judgment," the Philadelphia Gaming Advisory Task Force hired a number of consultants to advise them of the impacts a casino would have on the City.⁶ Unfortunately, even the Task Force report does not get to the bottom of the transportation impacts of a casino on Philadelphia communities. For example, while they report the variation from one weekday to another, they do not estimate the total weekly or daily attendance or the proportion of those attending arriving and departing by car.⁷ While the Gaming Advisory Task Force does report a tripling of traffic in the vicinity of the project for the Budd site over 24-hours on a Saturday, the Trump organization reports no overall increase in daily or annual traffic at the project location (see Table 3.1 of the Final Report, page 131). The basis of these Task Force numbers is never explained. However, because of the huge differences between the Trump organizations traffic analysis and the Task Force report, both reports need to be reassessed.

It needs to be emphasized that the Vollmer report does not in any way address daily travel patterns: there are no full day counts of existing traffic volumes, there is no distribution of casino trips over 24 hours, and there is no analysis of prolonged hours of high traffic volumes on nearby residential communities. Absent altogether is any assessment of existing and future accident patterns and pedestrian hazards. The only acknowledgment of people in the area is an estimate of trips to a new school in the area with a very curious class schedule. There is not even a hint of where casino-goers and workers are coming from and going to that would provide the basis for assigning trips to local street, highways and transit. There is no way of knowing if the Task Force's mandate of not encouraging traffic through residential streets will be met. The report lacks even a rudimentary land use and description of street functions, much less any diagrams of site entrances and exits by activity type (restaurants, casino, employee parking, bus loading and waiting areas, truck docks) to begin to discern circulation patterns.

Nor does the Trump organization deal with the variation of weekly attendance reported by the Gaming Advisory Task Force. Table 1 from their report is repeated below. It shows that Saturdays exhibit the greatest attendance with 22% of weekly attendance followed by Fridays. It is not at all clear what was used by Trump's consultant for their analysis. Clearly, the worst case weekday conditions would be a Friday evening. Was this what was analyzed? It is doubtful. Consequently, the analysis must be redone using actual Friday counts.

TABLE 1: PERCENT OF WEEKLY ATTENDANCE

Monday	11%
Tuesday	11%
Wednesday	11%
Thursday	12%
Friday	18%
Saturday	22%
Sunday	16%

See Footnote 7 for reference.

⁶ See list on page 2 of the Executive Summary to The Final Report submitted to the Philadelphia Gaming Advisory Task Force, October 27, 2005.

⁷ See Graph 1: Percent of Weekly Attendance prepared by The Innovation Group for the Task Force, page 12 of the Executive Summary and reproduced in Table 1 in this report.

The Task Force Final Report does explain that “(d)aily casino visitation tends to peak between 7 p.m. and 10 p.m.” but these periods are never analyzed.⁸ What is reported is that weekday peak hours (evening commuter hour) exhibits just 4.7% of total 24-hour traffic and the assumed Saturday midday peak hour, just 5.5% of total Saturday traffic.⁹ Much more information is needed if the communities hosting casinos in Philadelphia are to be fully informed about the impact of these projects. And, as noted above, the weekday peak hour must be evaluated for a Friday to exhibit worst case weekday conditions utilizing all Friday turning movement and ATR counts.

Unfortunately, the traffic study for the Trump Casino provides even less information than the report prepared for the Philadelphia Gaming Advisory Task Force. While the consultants for the Trump organization go through the motion of a traffic study more is left out than provided. The Trump Casino focuses on just two peak hours, the evening peak hour for weekdays and a Saturday late midday peak hour. Nothing is provided to support this selection nor do we know the day of the week that is being analyzed in the evening peak commuter period. And, as noted above, experience shows the peak traffic periods for casinos are from 7 p.m. to 10 p.m.

The lack of information and the serious inconsistencies between the Task Force report and the Trump Casino traffic study point to the need for additional work—i.e., a new traffic analysis that conforms to or at least explains the serious differences between these two reports supported by extensive traffic counts and surveys. For example, Table 1: Current and Projected Traffic Volumes at Potential Gaming Sites, page 13 of the Task Force Summary report, reports the following for the proposed Budd Site:

	24-Hour Traffic		Peak Hours	
	Weekday	Saturday	Weekday	Saturday
Current traffic volumes (Wissahickon north of Hunting Park)	15,502	12,914	1,284	659
Projected additional casino volumes	11,670	28,230	550	1,540

The Task Force has estimated the volume of traffic for the Trump Casino would average 28,230 vehicle trips on an average Saturday and 11,670 for an average weekday (not a Friday). From the Saturday total we can estimate Friday trip generation of 23,097 trips (18% times 28,230 divided by 22%). And we can estimate the weekly total for trips by dividing 28,230 by 22% for a total of 128,318 weekly trips or times 52 weeks per year for 6,673,000 trips (vehicle trips either to or from the Trump Casino).

Unfortunately, for anyone concerned about this project, the Trump organization does not report 24-hour volumes for any day, let alone a peak Saturday. And, because as explained elsewhere, the methodology for estimating trip generation is so confusing, inconsistent and frankly unbelievable, it is impossible to estimate from the Trump Casino traffic report precisely how many daily trips will actually occur.¹⁰

⁸ Page 12, Executive Summary.

⁹ Using the Task Force report as the basis for estimated 24-hour volumes.

¹⁰ Future analyses should include 5 to 6 p.m. and 7 to 8 p.m., at a minimum, for a worst case Friday.

In the description of the Trump Casino for this report we estimated a slightly lower number of vehicle trips, 6 million annually, lower than the estimate of 6.7 million reported above based on Task Force data. To be even more conservative and assuming about 10% of casino patrons use mass transit to access the site, we have used the lower estimate of 5.4 million vehicle trips annually to estimate the societal costs of the Trump Casino (see section below on the hidden cost of the Trump Casino).

MITIGATION

All these impacts are proposed by Vollmer to be mitigated by adding one and possibly two traffic signals near the casino entrance, installing two left-turn signals, modifying the signal timing on the intersection approach from the southbound Route 1 off-ramp and two concepts for modifying the off-ramps in both directions on Route 1, normally a process that takes five or more years. However, without modeling the highway, it cannot be judged whether the conceptual improvements would be sufficient. This tinkering of the existing system falls far short of the Task Force's recommendation that "the casino developer should provide a complete Transportation Management Plan and Parking Management Plan. These plans should include costs and benefits of each improvement and impact on the community in terms of neighborhood encroachment and livability."

Of greatest interest are plans for Route 1 (Page 27): "During the PM peak period the Route 1 Southbound Off-Ramp at times queues onto the Route 1 mainline. **Appendix F** (still not provided by the City or the Trump organization) contains a plan depicting the Rt. 1 SB Ramp Relocation Concept. This proposed improvement would relocate the entrance to the ramp to provide an additional 750' of storage on the ramp." It is not clear whether or not this occurs today because no analysis has been provided by the Trump organization. However, the Trump Casino would add hundreds of vehicles to this ramp in the PM peak hour, certainly exacerbating the problem if not causing it. Modeling of the highway mainline would likely show that the addition of over 9,000 trips on Fridays and more than 11,000 on Saturdays to Route 1, which now carries a weekday average of approximately 118,000 vehicles, total both directions, approximately a 10% increase (and somewhat less proportional increase on I-76), will have a severe domino effect on the entire corridor. In addition to the adverse impacts on individuals and the regional economy, the State will be faced with huge additional costs of highway construction to off-set the added casino traffic.

Further along, under Proposed Mitigation, the report states "(i)t is anticipated that a concept that would modify the slip ramp from Route 1 northbound onto Abbotsford Avenue will be presented to PennDOT. This modification would provide a direct connection to Stokley Street, while maintaining the slip ramp connection to Abbotsford Avenue...**Appendix F** contains a plan depicting this concept." Without a drawing, it is not at all clear what is proposed for this location.

It must be emphasized, and as suggested above, while the Trump organization is proposing to mitigate problems along Route 1, no analysis of service levels was included in the traffic study to characterize conditions before and after this project opens for business. This is a huge gap in the analysis and must be corrected.

Two standard traffic issues completely ignored by the Trump organization in its traffic analysis are the adequacy of parking and the effects of new casino traffic on traffic accidents.

Parking

Normally, a full traffic analysis would contain a detailed parking accumulation study for worst case conditions (a Friday and Saturday). This would entail estimating the number of vehicles entering and leaving the site by time of day and thereby estimating parking requirements. Since we have been dealing with average conditions in this report (as presumably has the Trump organization's consultant) a worst case estimate might require a 30% margin for the provision of parking (in other words, daily casino attendance might vary by plus or minus 30% over the course of a year). Whether or not this occurs is another responsibility of the Trump organization in providing data based on past experience for similar facilities. Considering the long list of "professional judgments" that were made in estimating project trips and the questionable accuracy of what has been presented, the lack of any parking analysis simply reinforces the need for a much more detailed traffic study with robust supporting empirical documentation.

Traffic Accident Analysis

Also missing from the traffic analysis is an assessment of project traffic on traffic accidents. The accident analysis should focus on intersections with high accident rates as well as the overall impact of Trump casino traffic on the number of traffic accidents. Traffic accidents will grow in proportion to the amount of travel introduced by the Trump Casino. As reported below, an increase in annual vehicle miles of travel will increase traffic injuries by 34 a year and property damage only accidents by 118. The full cost to the people who live and work in proximity to the Trump Casino site is reported below.

THE HIDDEN COST OF THE TRUMP CASINO

The hidden costs to motorists, their passengers, and visitors, residents and workers of the area due to increased vehicular use by patrons of the Trump Casino include the costs of lost travel time, physical injury, health effects, noise impacts, damage to our roads and utilities. Other costs are paid through taxes such as the control of water pollution, oil spills, greenhouse emissions, the lost value of highway land removed from tax rolls, and, most apparent today, the foreign policy and defense costs of protecting the supply of imported oil. These harms to society and to households and to the economy of Philadelphia in general are not well recognized by the public because they increase by a small margin with each added mile of travel and because they are spread among the entire population, both vehicle users and non users, buried in items such as lower productivity, higher consumer prices and higher insurance costs. But taking them together, even using a low range of vehicle related costs due to Trump Casino car and truck use greatly reduce the realistic local economic benefits of the project. The costs are based on the well-documented costs per vehicle of mile travel published by the Victoria Transport Policy Institute (VTPI),¹¹ adjusted for the higher cost of living in northeast urban area compared to national averages used by VTPI for externality costs.

Estimating the Annual Travel Associated with the Operation of the Trump Casino

The Trump Casino traffic report does not address the daily, weekly or annual impacts of the proposed project. We are therefore forced to analyze this project on the basis of data provided

¹¹ Litman, T., "Transportation Cost and Benefit Analysis, Techniques, Estimates and Implications," Tables 6, 7 and 8, Victoria Transport Policy Institute, June 2003, www.vtpi.org/htm .

by the Philadelphia Gaming Advisory Task Force. The resulting daily and annual travel, based on Task Force data is presented above. The results, conservatively estimated, are that the project will generate 18,700 trips on a Friday, 22,850 trips on a Saturday and 5.4 million trips annually. These are trips either to or from the site. In other words, of the 5.4 million car trips estimated for this project, 2.7 million will arrive and 2.7 million depart the site each year.

To estimate annual travel associated with the Trump Casino, we have assumed a 15-mile catchment area with an average one-way trip distance of 8 miles, for a total annual travel of approximately 43 million miles new to the Philadelphia area. This result is used to estimate the externality costs of the Trump Casino that will be borne by the people who live and work in proximity to the casino site as well as the tens of thousands of daily travelers along Route 1 and Interstate 76.

Estimating the Social Costs of Trump Casino Traffic

The externality costs of vehicle access to the Trump Casino are summarized in Tables 1 and 2. They were derived by estimating travel associated with the casino described above and multiplying the miles per year by VTPI's cost factors. Since VTPI's figures are based on nationwide averages and do not take into account Philadelphia's greater cost of living, they have been adjusted slightly to correct for this difference. They do not differentiate by vehicle type and only provide for two types of travel: urban peak period and urban off-peak travel.

Added Travel Time Costs

Philadelphia already suffers heavily from too many cars and trucks trying to move on its limited roadway system. Congestion losses, in terms of reduced productivity for businesses -- wasted time for all motorists -- are huge. For the Trump Casino the costs of slower travel as a result of adding more than 43 million miles of travel annually totals approximately \$15 million a year for local roads and for the surrounding arterial and expressway system.

Air Pollution

The Philadelphia metro area continues to be in non-attainment for safe levels of ozone and fine particulate emissions for the foreseeable future.¹² Cars and trucks cause more than half the state's ozone problem. Motor vehicles also cause half of Philadelphia's toxic air pollutants, including fine particulate emissions at street level mostly from diesel trucks and buses. Auto pollution attacks the human respiratory system, causing serious health problems, especially among the young and old for people suffering from chronic respiratory disorders such as asthma. Asthma is the biggest cause of school absenteeism in the nation and is several times more prevalent in Philadelphia's low-income areas. Diesel particulates are known to cause cancer. Acid rain eats away at Philadelphia's buildings along with harming the State's wildlife and food crops.

While new car technology is helping to reduce tailpipe emissions, these gains are overwhelmed by the increase in car and truck use and the growth in SUVs (albeit, slowed somewhat by high fuel costs). In order to meet federal clean air health standards, the Philadelphia area should reduce vehicular activity by about 1% per year from 1990 levels. Instead, car and truck use state wide is actually growing by more than 2% per year on the region's arterials and expressways. Any action that will increase auto use will undermine this goal. The health and property damage

¹² "Transportation Conformity of the DVRPC FY 2007 Transportation Improvement Programs and the Destination 2030 Long Range Transportation Plan," Delaware Valley Regional Planning Commission, May 1006.

from automotive air pollution resulting from the Trump Casino will total about \$3.3 million annually of which about half will occur along nearby arterials and expressways.

Accident Costs

One of the most costly harms produced by cars and trucks are the physical damage to human bodies and property. Traffic accidents, death, injury and property damage will total more than \$5.2 million in losses each year as a consequence of adding more than 43 million more miles of travel because of Trump Casino patrons and employees. These costs are not borne by accident insurance. They constitute losses to businesses which suffer lost productivity, including the need to hire and train additional staff, and the pain and suffering of accident victims themselves, a large proportion of whom are non-motorists in the areas of Philadelphia surrounding the Trump Casino. Using state wide average accident rates, this traffic will result in one more death every three years and 34 injuries and 118 property damage only accidents every year from Trump Casino traffic.

Other Major Societal Costs

And there are other costs that have not been individually quantified in dollar terms: storm water runoff of road salts and toxic organics that are a major source of water pollution, the damage and clean up costs of oil spills, greenhouse effects of vehicular emissions, the value of land devoted to highways and removed from our tax roles, the value of unpaid parking of cars and trucks which amount to untaxed subsidies to motorists, the cost nationwide of disposing of ten million car and truck chassis and a quarter billion tires each year, the social costs to those deprived of auto access, the foreign policy and defense costs of protecting our supplies of imported oil (the current Iraq war), and a similar array of hidden costs due to the manufacture and distribution of vehicles and the storage and refinement of petroleum products. Taken together, these additional costs total approximately \$15.3 million a year in damages to the Philadelphia area's economy and to its citizens as a consequence of the additional traffic generated by the Trump Casino.

Thus, the added congestion delay, accidents, environmental impacts and other traffic-related costs from the Trump casino alone will cost residents of the Philadelphia region an estimated \$40 million a year, which is more than four times its projected \$9.8 million in annual wage tax cut benefits¹³ and 10% of its total revenues.¹⁴ These social cost estimates use well-established costs per vehicle mile, assuming 43 million miles of travel generated by the casino within a 15-mile region.

¹³ Task Force Executive Summary, Table 7, p. 24.

¹⁴ Ibid., Table 2, p. 16.

TABLE 1

**SUMMARY OF ANNUAL TRAFFIC DAMAGES FROM
TRUMP CASINO IN PHILADELPHIA**

(ESTIMATED FOR 2008)

	IMPACT
CONGESTION	\$15,000,000
TRAFFIC ACCIDENTS	\$5,200,000
AIR POLLUTION	\$3,300,000
TRAFFIC NOISE	\$600,000
OTHER EXTERNALITY COSTS	\$15,300,000
TOTAL COST TO COMMUNITY	\$39,400,000

COSTS ESTIMATED FOR PHILADELPHIA FOR YEAR 2008

Brian Ketcham Engineering, P.C., May 27, 2006

TABLE 2

SUMMARY OF TRAFFIC AND AIR POLLUTION TRUMP CASINO IN PHILADELPHIA

(ESTIMATED FOR 2008)

TOTAL ANNUAL VMT W/ PHILADELPHIA COUNTY	5,400,000,000
NEW VMT EACH YEAR FROM PROP. DEVELOPMENT	43,211,438
ANNUAL INCREASE IN TRAFFIC ACCIDENTS	
INCREASED FATALITIES	0.3
INCREASED PERSONAL INJURIES	34
INCREASED PROPERTY DAMAGE ACCIDENTS	118
AIR POLLUTION IMPACTS (tons per year)	
CARBON MONOXIDE EMISSIONS (TPY)	526
HYDROCARBON (VOC) EMISSIONS (TPY)	30
NITROGEN OXIDE (NO _x) EMISSIONS (TPY)	25
PARTICULATE (PM10) EMISSIONS (TPY)	1.5

Brian Ketcham Engineering, P.C., May 27, 2006

CONCLUSIONS AND RECOMMENDATIONS

On the basis of my analysis, it is clear the traffic analysis for the Trump Casino at the Budd site is unclear, incomplete, and inconsistent both on its own merits and with the reports prepared for the Philadelphia Gaming Advisory Task Force, fails to report on critical issues like the impact along Route 1 or Interstate 76 or for the real peak hours from 7 p.m. to 10 p.m. The only conclusion anyone with common sense and consideration to the communities hosting this project is to go back to the drawing board, redo the analysis while addressing the issues raised herein, and provide proper mitigation for each and every impact. Only when a proper traffic analysis consistent with the Philadelphia Gaming Advisory Task Force report is completed and reviewed by the community can the community itself decide whether or not they want this project?

ACTIONS REQUIRED BY THE TRUMP ORGANIZATION BEFORE ANY ACTION IS TAKEN ON THIS CASINO PROJECT

So, what must the Trump Organization do to correct the errors and omissions found in their Consultant's traffic report and what must they do to conform the project to the expectations of the Philadelphia Gaming Advisory Task Force?

1. Undertake more extensive data collection – turning movement counts on a Friday from 3 to 10 p.m. and on a Saturday from noon to midnight. ATR (automatic traffic recorder) counts for a minimum of seven days for roads fronting the property and for Routes 1 and Interstate 76 including all nearby entrance and exit ramps.
2. Survey at least two different existing slot machine casinos of the size and location proposed for the Trump Organization over a 24-hour period for a Friday and Saturday (a 24-hour operation is, after all, proposed). Door counts and interviews should provide sufficient understanding of the travel behavior of a slot machine casino to establish travel characteristics for the proposed Trump Casino at the Budd site in Philadelphia. These field counts must be used as the basis for estimating project impacts, not the so-called “professional judgments” that were applied in the traffic report.
3. Expand the Consultant's Synchro traffic simulation model to include Route 1 and Interstate 76, including nearby entrance and exit ramps and incorporate this expanded model into the Trump Casino traffic study. And use this model to compare area wide operating characteristics for conditions without and with the Trump Casino.
4. A full parking accumulation analysis must be performed that accommodates patrons and the project's 1,500 employees over 24-hours for a typical and a worst-case Friday and Saturday.
5. A full accident analysis must be prepared summarizing existing accident history for the area and projecting the impact of the Trump Casino on annual traffic accident characteristics similar to what is reported above. (Many of the roads suggested for entering and leaving the site were observed to have large numbers of very young children.)
6. Develop and commit to implementing traffic improvements sufficient to fully mitigate project impacts, especially those that effect motorists along Route 1 and Interstate 76 where half of the project trips are expected to travel. Mitigation impacts can be tested using the Synchro model. Full mitigation would restore traffic to conditions without the Trump Casino as measured by average travel speeds and total vehicle delay for the Synchro traffic network.
7. All these materials, including the raw traffic data, surveys and the Synchro model must be provided for review and analysis 45-days prior to any action taken on this project.

APPENDIX 1

EXAMPLES OF ERRORS AND OMISSIONS FOUND
IN THE TRUMP CASINO TRAFFIC ANALYSIS

Examples of errors and omissions found in the Trump Casino traffic analysis

Route 1, where 50% of the Trump Casino traffic will travel, is ignored.

Route 1 and Interstate 76 are ignored completely. Half of the Trump Casino traffic is assigned to these roads, 50% to Route 1 and 25% to Interstate 76. Observation on the afternoon of May 25, 2006 showed both roads at or near capacity for much of the time from 2 to 7 p.m. Clearly, the addition of thousands of trips during morning and evening peak periods will have significant impacts to the tens of thousands of motorists already using Route 1 and Interstate 76 along with the nearby entrance and exit ramps, some of which were nearing capacity during my observation. Clearly, a project of this size, dependent on access via Route 1 and Interstate 76, cannot simply ignore these impacts and turn over to the City and State the responsibility of mitigation at taxpayer expense.

Trip Generation

Rather than analyzing trip patterns at other Trump casinos, the study of the Budd site relies on the "professional judgment" of the prominent engineering firm who performed the study, Vollmer Associates, to estimate that during unspecified weekdays between 4:45 to 5:45 p.m., 20% of the players at 5,000 slot machines would enter or exit along with 20% of the 1,500 employees. On Saturday afternoons, Vollmer estimated that 25% of casino-goers arrive or depart along with 32% of employees. Although some additional trips were assumed for people just going to on-site bars and restaurants, these reduced the numbers of overall patron trips by 15%, which are assumed to be two per auto (based on a 3-hour survey at a Delaware slot casino.) Auto trips were further reduced by assuming 10% of patrons and 40% of employees travel by bus. No mention was made of whether it is assumed workers who drive are two per car. This adds up to 918 peak hour trips on weekdays and 1,386 on Saturdays, which is higher than the Gaming Advisory Task Force's forecast of 550 trips on weekdays, but lower than the Task Force's expected 1,540 vehicle trips on Saturdays.

Assignment of project trips not supported

The assignment of project trips is simply reported without supporting documentation. What are the demographics of casino attendees and precisely where will they originate and return to? That information is not reported. What is reported is that 50% of all project traffic will utilize Route 1 to access or egress the casino. And, while the traffic study reports on Page 5 that "(t)his study focuses on analyzing the maximum traffic impact to the adjacent roadway network," no analysis is presented about the effects of casino traffic along Route 1 and Interstate 76 or at their entrance and exit ramps. This is important as Route 1 moves approximately 118,000 cars and trucks daily (both directions) in the vicinity of the project¹⁵ and (based on observation) any increase in this traffic will affect all traffic moving along Route 1 and Interstate 76. The summation of this impact alone is estimated to substantially exceed all local impacts. It is disingenuous to cherry pick intersections for analysis that, in general, have plenty of available capacity to accommodate casino traffic and ignore the more distant, and severely impacted locations to be borne by the City, the State and its residents.

Use of the Synchro model

The Trump organization's traffic consultant appropriately utilized a traffic simulation model to estimate project impacts at nearby intersections. This model can be used to inform the public in greater detail about this projects full impact. All that needs to be done is to add Route 1 and Interstate 76 to the model and run the model for overall measures of effectiveness (travel time,

¹⁵ Data provided by the Delaware Valley Regional Planning Commission in a telephone conversation May 30, 2006.

delay, average travel speed, emissions, etc.). While the impact along Route 1 is not reported directly, recommended mitigation along Route 1 (Page 27 of the traffic report) suggests severe impacts that must be reported to complete the record for this project.

Trip Generation

In estimating the number of trips generated by the casino, it is reported on Page 6 (in addition to the statement that all estimates are “professional judgments”) that it is estimated that all 5,000 slot machines would be utilized by a different person each day, or 5,000 individuals entering and leaving the project site. Yet, it is assumed that these 5,000 people would make just 5,000 trips over the course of a single day to play the slots. Standard practice would be to assume that approximately 2.2 trips (assuming no other valid data were available) would be made by each slot user, for a total of 11,000 trips (5,000 times 2.2) not 5,000 person trips as reported. If this error is carried through the entire analysis, then Trump’s consultant has substantially underestimated project trips. In fact, as reported above, the potential for vehicular trip generation has been significantly under reported as reported by data provided by the Philadelphia Gaming Advisory Task Force.

The time periods selected for worst case impact may not be correct

The traffic analysis reports impacts for just two time periods, the evening weekday peak commuter hour (4:45 to 5:45 PM) and a Saturday peak hour (3:15-4:15 PM). Worst case assumptions were made for these two time periods and presumably Trump’s consultants thought other time periods suffered lower impacts. However, this casino is planned for 24-hour operation. There are schools in proximity to the project site. The site is near low-income residential communities. The impacts on schools or on nearby residential communities are ignored. They should not be. Most important, and as discussed elsewhere, the Philadelphia Gaming Advisory Task Force reports worst case project impacts, based on experience elsewhere, occur from 7 p.m. to 10 p.m. when local children can be expected to be on the streets, especially in the summer. This is just another example of the need for a robust data collection and survey effort.

Table 1 -- Trip generation estimates

Table 1 of the traffic analysis, Trip Generation should be labeled to clarify that the trips displayed in the last four columns are vehicle trips. This table is confusing in that the discussion of trip generation on pages 5 through 15 (pagination is also confusing) there is considerable confusion about whether trips are person trips or vehicle trips. The only way to establish which is what is to cross reference Table 1, a confusing task for readers. The report needs to be revised to state clearly this difference. More importantly, and as emphasized in this report, a more robust data base needs to be acquired that establishes trip generation characteristics based on actual counts not “professional judgment.”

Arrival & Departure Time Distribution

On Page 12 and continuing on Page 14 the traffic analysis states “(t)he patrons of the Casino are anticipated to have “unscheduled” arrival and departure rates. Although certain peak hours of arrival and departure may occur, activity into and out of the venue is not limited to a predetermined schedule.” If so, why is this not analyzed in detail instead of limiting the analysis to a weekday (not Friday) peak hour and a Saturday peak hour? This is particularly the case for the 1,500 employees who are scattered over the workday (Table 2, Page 14) which are shown also in Figure 7 – Employee Trip Distribution. However, Figure 7 shows a negative 300 employee accumulation in the last column of the table. The report should be revised with a full explanation of negative employees.

Moreover, Figure 6 – School Trip Distribution, depicts trip distribution for a very weird school with a third of the students arriving by 9 AM, with another third arriving from 10 AM to noon, with the original third beginning to leave at 11 AM, with the last third leaving between 6 and 8 PM. This is unusual but is not explained in the report. No school trips are assumed during the two reporting periods covered in the report (although a trip adjustment is made for Saturdays for schools). The school operation needs to be checked and the report on school trip distribution needs to be corrected.

These are just two more examples of the errors contained in the Trump Casino traffic analysis.

Trip adjustments.

Page 16. It is important to note that vehicle occupancy is based on a very limited sample of counts at what is referenced as the Delaware Park, a slot and horse racing venue. Vehicle occupancy counts were limited to three hours on a single Friday. If vehicle occupancy counts can be completed, albeit on a very limited basis, then door counts and other surveys that are recommended herein can be obtained as well establishing the accuracy of the “professional judgment” that is the basis for this traffic analysis. Before any action is taken on the proposed Trump Casino, these counts must be acquired.

Pass-By Credit. Page 16. While no pass-by credit was taken (understandable because of the relatively secluded location of the project in what remains of a very large and largely abandoned industrial park surrounded by residential communities), adjustments were made for “internal trips” accounting for the variety of activities that would likely be attended by each patron. The result is a 15% reduction in overall trip making. This is not unreasonable considering the conservative nature of the “professional judgment” that is the basis for this traffic analysis.

Note that in the societal cost analysis presented earlier, vehicle miles of travel was based on patrons arriving and departing the site, so adjustments for internal circulation are not relevant.

A further 10% reduction in overall trip making was assumed for transit use by employees or students (bringing the total reduction to 25%). However, the resulting trip making does not compute. The report states on Page 19, “The entire development, after adjustments for transit usage, is estimated to generate a total of 918 trips (546 IN and 372 OUT) during the PM peak hour and 1386 trips (870 IN and 516 OUT) during the Saturday peak period.” A 25% reduction in trips reported in Table 1 show some difference in trip making: PM peak hour, 538 IN, 382 OUT, and for Saturday, 914 IN and 516 OUT. The big difference is entering vehicles on Saturday afternoons. However, this is not the end of the story. Figures 9 and 10, reporting the site generated traffic volumes for the PM and Saturday peak hours present a still different story: PM peak hour, 546 IN, 412 OUT; Saturday peak hour, 869 IN, 541 OUT. These inconsistencies need correcting. Low-balling project traffic impacts obviously under reports project impacts and reduces or eliminates the need for mitigation.

Trip distribution

Page 19. Trip Distribution. As noted above, no supporting documentation is provided for how trip distribution was estimated. It should be noted, however, that 50% of traffic is estimated to utilize Route 1 (Table 4 – Trip Distribution) and half of this will utilize Interstate 76. The Trump organization’s consultant should provide the needed supporting documentation showing the basis for these assumptions. And, as noted above, they should estimate the impact of this project on Route 1 and Interstate 76 traffic movements.

Traffic impacts.

Pages 19 - 26. Trump's consultants utilized the Synchro 6 software to estimate project traffic impacts. Again, no estimate of impacts along Route 1 or Interstate 76 is provided. However, traffic operations in the study area without the project appear to be reasonable at most locations (except for Intersection 10 and Intersection 160) which display Level of Service (LOS) F (breakdown) conditions (assuming their peak hour analysis and trip generation and distribution is correct, which we dispute).

With the project completed, a number of intersections display LOS E or F without mitigation (Page 26). Whether or not these are reasonable estimates depends on the assumptions incorporated into the Synchro model. Therefore, no action should be taken on this project until the traffic analysis is corrected and the Synchro files for this project have been revised and reviewed independently.

It has to be noted that Figures 11 and 12, depicting the Build traffic volumes, are not balanced, meaning the number of vehicles leaving one intersection do not match the volumes reported approaching an adjacent intersection. Many intersections show lower volumes approaching an intersection than leaving an adjacent intersection. The consequence is that some intersections are under reporting service levels. Figures 11 and 12 need to be corrected, or the consultant needs to provide justification for these differences, and the LOS calculations need to be revised. Again, it would be helpful to review the input data for the Synchro model to verify a match with Figures 11 and 12.

The results of the impact analysis are summarized in Figures 13 and 14, Level of Service Summary, are nearly illegible. Neither figure reports on service levels for Route 1 or Interstate 76 where 50% of project traffic are directed.

Randy Baker

May 31, 2006

Dear Gaming Control Board,

I live in Germantown fairly close to where the proposed "TrumpStreet" slots casino is planned.

I feel that a casino will be very bad for our neighborhood and for the city as a whole.

Most of the people who live in the surrounding communities of North Philadelphia are poor or working class folks. This casino will have the effect of taking their money and making some people who are already rich much richer, kind of a reverse Robin Hood. People who are addicted to gambling will now have a casino within walking distance. Families will be hurt.

The "culture" of the city will change for the worse. What comes to mind when Los Vegas or Atlantic City are mentioned? While certainly there are some "glamorous" connotations, they don't stand out as places where you would want to raise a family.

Philadelphia has many problems. Casinos will not (as they are being portrayed) help solve these problems; casinos will make them worse – and for years to come. Let's not create another problem for our kids, a problem which will probably never go away.

I don't believe that our politicians have thought this through thoroughly. Philadelphia does not need casinos.

Thank you for reading this letter. I hope that you will rethink this whole issue.

Sincerely yours,

Randy Baker
Randy Baker

PA Gaming Control Board
303 Walnut Street, Strawberry Square
5th Floor, Verizon Tower
Harrisburg, PA 17101

Attn: Public Comment

Re: my objection to slots parlors and casinos in Philadelphia

Dear Sirs and Madams:

Thank you for accepting letters from concerned citizens protesting the building of casinos in our great historic city of Philadelphia.

I, a naturalized, proud minority U.S. citizen and 11 year resident of Philadelphia, object to the proposed casinos, especially the ones proposed to be built in residential neighborhoods. Due to my close proximity to the proposed Trump Street Casino in Nicetown, please consider my concerns as legitimate and substantial. I believe the impact that casinos have on the character and culture of our great historic city of Philadelphia will be detrimental in the long run and irreversible. Philadelphia may indeed become an economically viable 'Atlantic City' but only by selling out its hard-earned identity. The more likely reality is that our city will struggle with even greater economic disparity and its concomitant social ills instead of being able to work towards more creative solutions.

Given the lack of media coverage regarding the approval of the casinos and *Act 71*, I respectfully request on behalf of many other concerned citizens of our great historic city, a three month extension of your June 2, 2006 deadline to hear and receive more comments regarding the casinos. Thank you.

Sincerely,



Andy Kim - *Philadelphian*

Mr. Tad Decker, Chairman
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg PA 17106-906

RE: *OPPOSITION TO GAMING AT THE BUDD SITE*

Dear Mr. Chairman:


The slots facility proposed by Preferred Properties and the Trump Organization for the former Budd Plant property ("Budd Site") is likely to cause more harm than good. My objections are as follows:

- While jobs have been "promised" to local residents, I am certain that the jobs will be dead-end, low-paying, part-time, no benefits positions.
- Gambling is not an appropriate anchor for neighborhood commercial districts. It is not consistent with plans to provide badly needed goods and services to nearby neighbors.
- Promises of economic benefit to small shop owners are unconvincing. I fear that businesses imported to service the gambling crowd will hurt independently owned businesses in my area.
- Studies have linked casinos to increasing social problems, such as addictive behavior, financial irresponsibility, family neglect, and crime. My neighborhood cannot tolerate this erosion.
- 24/7 activity will be disruptive; studies have indicated increases in traffic of 215-233%. Traffic will pass residences, schools, parks and churches, endangering and inconveniencing neighbors.
- Philadelphia needs more affordable housing to attract middle income families. Speculation and tax increases will force older folks from their homes, and decrease opportunities for first-time home-buyers.
- Inadequate access/egress in all probability will necessitate taking additional property to accommodate casino traffic and service facilities. This is unacceptable.

I urge the Pennsylvania Gaming Control Board to consider these objections carefully in reviewing proposals from developers, especially since I understand that nearly 70% of the respondents to written surveys circulated in nearby communities share my concerns.

THE BOTTOM LINE - The Budd Site should be used for commercial and residential development that will enhance the quality of life in our neighborhoods, not undermine it. Gambling simply doesn't fit the picture.

Sincerely,



Liza Hawley

Angela Ludovici

May 25, 2006

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

Re: Trump's Proposed Casino on Henry Ave

I am writing to oppose the placement of a Casino at Roberts and Henry Avenue

As a lifelong resident of Philadelphia who lived in the North Philadelphia area bordering Fox and Hunting Park and a forty year resident of East Falls, I am familiar with the area and believe that a Casino on the proposed site will not serve to improve it.

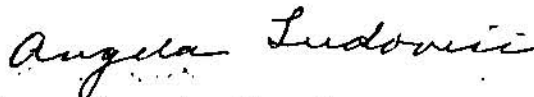
The only possible benefit that I can see is the potential for jobs. With other enterprises opening in East Falls and at Fox and Hunting Park there is already potential job growth in the area and the number of jobs projected by Trump is not that high.

The benefit of potential job growth is far outweighed by the negative impact this proposal will have on the surrounding communities. The influence of gambling on the young people in the area will create problems and will cause young adults with children to stop moving here. The increase in crime will negatively impact an already stretched police force. Traffic will be increased and with the limited access routes in this area will create major gridlocks.

East Falls is a growing residential area that has a lot going for it. I have frequently heard the comment "I did not know there were neighborhoods like this in the city". The closeness of Fairmount Park and the river, the short commute to Center City, the availability of public transit, churches and schools make East Falls an area that should be encouraged to grow in the way that it is growing. To change it by putting a Casino on one of the few major roads in the area and right behind a school makes no sense.

Please do not place a Casino in this area. Thank you for your attention.

Sincerely,



Angela Ludovici

East Falls Historical Society

Mr. Tad Decker, Chairman
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg PA 17106-906

RE: **OPPOSITION TO GAMING AT THE BUDD SITE**

Dear Mr. Chairman:

The slots facility proposed by Preferred Properties and the Trump Organization for the former Budd Plant property ("Budd Site") is likely to cause more harm than good. My objections are as follows:

- Gambling is not an appropriate anchor for neighborhood commercial districts; It is not consistent with plans to provide badly needed goods and services to nearby neighbors.
- Promises of economic benefit to small shop owners are unconvincing. I fear that businesses imported to service the gambling crowd will hurt independently owned businesses in my area.
- While jobs have been "promised" to local residents, I am not convinced that young people in my neighborhood will qualify, or that the jobs will be other than dead-end, low-paying positions.
- Studies have linked casinos to increasing social problems, such as addictive behavior, financial irresponsibility, family neglect, and crime. My neighborhood cannot tolerate this erosion.
- 24/7 activity will be disruptive; studies have indicated increases in traffic of 215-233%. Traffic will pass residences, schools, parks and churches, endangering and inconveniencing neighbors.
- Philadelphia needs more affordable housing to attract middle income families. Speculation and tax increases will force older folks from their homes, and decrease opportunities for first-time home-buyers.
- Inadequate access/egress might necessitate taking additional property to accommodate casino traffic and service facilities. This is unacceptable.

I urge the Pennsylvania Gaming Control Board to consider these objections carefully in reviewing proposals from developers, especially since I understand that nearly 70% of the respondents to written surveys circulated in nearby communities share my concerns.

THE BOTTOM LINE – The Budd Site should be used for commercial and residential development that will enhance the quality of life in our neighborhoods, not undermine it. Gambling simply doesn't fit the picture.

Sincerely,

Ellen Schubert
President,

East Falls Historical Society

May 4, 2006

PA Gaming Control Board
Tad Decker, Chairman
Governor Edward G. Rendell
Senator Vincent Hughes
Representative Jewell Williams
Councilman Michael Nutter

RE: Trump's Proposed Casino on Henry Ave., Phila.

Dear Legislative Group:

My husband and I are residents of the East Falls section in the city of Philadelphia. We are extremely concerned about the proposed casino on Henry Ave. Our family has lived here for over 6 years and we want our community to remain the same. We do not want a casino built here and the reasons are: the local traffic will increase by 200% and our property value will decrease because we live within a mile of the casino. We need our legislative body to protect our neighborhood and quality of life.

Please do not allow a casino to be built on Henry Ave. We really love living here and we hope that you will respect our community's pleas and vote no for Trump's proposed casino in Nicetown. There is no good that can come from having a casino built here. Thank you for your time and understanding.

Sincerely,

Handwritten signature in black ink that reads "Claire Progner-Reed + Derek Reed". The signature is written in a cursive style.

Claire Progner-Reed & Derek J. Reed

Mr. Tad Decker, Chairman
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg PA 17106-906

RE: **OPPOSITION TO GAMING AT THE BUDD SITE**

Dear Mr. Chairman:

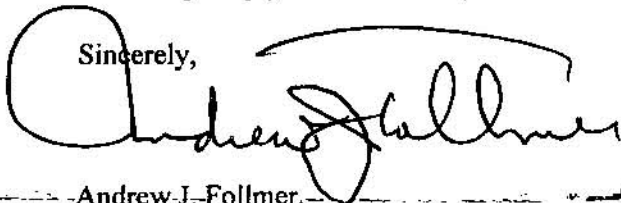
The slots facility proposed by Preferred Properties and the Trump Organization for the former Budd Plant property ("Budd Site") is likely to cause more harm than good. My objections are as follows:

- Gambling is not an appropriate anchor for neighborhood commercial districts; It is not consistent with plans to provide badly needed goods and services to nearby neighbors.
- Promises of economic benefit to small shop owners are unconvincing. I fear that businesses imported to service the gambling crowd will hurt independently owned businesses in my area.
- While jobs have been "promised" to local residents, I am not convinced that young people in my neighborhood will qualify, or that the jobs will be other than dead-end, low-paying positions.
- Studies have linked casinos to increasing social problems, such as addictive behavior, financial irresponsibility, family neglect, and crime. My neighborhood cannot tolerate this erosion.
- 24/7 activity will be disruptive; studies have indicated increases in traffic of 215-233%. Traffic will pass residences, schools, parks and churches, endangering and inconveniencing neighbors.
- Philadelphia needs more affordable housing to attract middle income families. Speculation and tax increases will force older folks from their homes, and decrease opportunities for first-time home-buyers.
- Inadequate access/egress might necessitate taking additional property to accommodate casino traffic and service facilities. This is unacceptable.

I urge the Pennsylvania Gaming Control Board to consider these objections carefully in reviewing proposals from developers, especially since I understand that nearly 70% of the respondents to written surveys circulated in nearby communities share my concerns.

THE BOTTOM LINE – The Budd Site should be used for commercial and residential development that will enhance the quality of life in our neighborhoods, not undermine it. Gambling simply doesn't fit the picture.

Sincerely,



Andrew J. Follmer,

(East Falls resident since '03)

SAY NO TO TRUMP STREET!

Sarah Lampe

Mr. Tad Decker, Chairman
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg PA 17106

April 7, 2006

Dear Mr. Decker,

I have a very direct and simple purpose in writing this letter: **PLEASE SAY NO TO TRUMP STREET!!!**

My husband and I moved to East Falls almost two years ago. We fell in love with the neighborhood after renting for one year. We pulled together all of our savings and managed to put a down payment on a fixer-upper rowhome on Ainslie Street, just a stone's throw from the proposed site of TRUMP STREET. We have poured hours of energy and most of our disposable income into this home to completely restore it and make the neighborhood a better place.

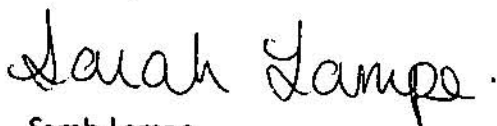
Our neighborhood is full of people doing the same thing. We wake up on Saturday mornings to the sound of pounding hammers and power saws; a sound of progress and change. Every month our neighborhood looks better and better and the market values continue to rise. East Falls and the areas surrounding TRUMP STREET do not need a boost from a real estate developer who will bring pawn shops, crime, traffic and gambling to our residential streets!

Please **DO NOT LET TRUMP BUILD A CASINO IN OUR NEIGHBORHOOD!**

Our neighborhood is thriving with lots of young families and professionals who do not want gambling brought to our doorsteps.

Thanks for making the right decision and saying **NO TO TRUMP STREET!**

Sincerely,



Sarah Lampe

December 14, 2005

From:
ETHEL WILLIAMS

Mr. Tad Decker, Chairman
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg, PA 17106-906

RE: **OPPOSITION TO GAMING AT THE BUDD SITE**

Dear Mr. Chairman:

The slots facility proposed by Preferred Properties and the Trump Organization for the former Budd Plant property ("Budd Site") is likely to cause more harm than good. My objections are as follows:

- Gambling is not an appropriate anchor for neighborhood commercial districts; it is not consistent with plans to provide badly needed goods and services to nearby neighbors.
- Promises of economic benefit to small shop owners are unconvincing. I fear that businesses imported to service the gambling crowd will hurt independently owned businesses in my area.
- While jobs have been "promised" to local residents, I am not convinced that young people in my neighborhood will qualify, or that the jobs will be other than dead-end, low-paying positions.
- Studies have linked casinos to increasing social problems, such as addictive behavior, financial irresponsibility, family neglect, and crime. My neighborhood cannot tolerate this erosion.
- 24/7 activity will be disruptive; studies have indicated increases in traffic of 215-233%. Traffic will pass residences, schools, parks and churches, endangering and inconveniencing neighbors.
- Philadelphia needs more affordable housing to attract middle income families. Speculation and tax increases will force older folks from their homes, and decrease opportunities for first-time home-buyers.
- Inadequate access/egress might necessitate taking additional property to accommodate casino traffic and service facilities. This is unacceptable.

I urge the Pennsylvania Gaming Control Board to reject the application for a slot parlor at the Budd Site and consider the above objections carefully in reviewing proposals from developers, especially since I understand that nearly 70% of the respondents to written surveys circulated in nearby communities share my concerns.

THE BOTTOM LINE – The Budd Site should be used for commercial and residential development that will enhance the quality of life in our neighborhoods, not undermine it. Gambling simply doesn't fit the picture.

Sincerely,

Ethel Williams

Bcc:

✓ Mr. Tad Decker, Chairman
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg PA 17106-9060

11/19
Tel: 717-737-4400
Fax: 717-737-4400
www.pgc.state.pa.us

Governor Edward G. Rendell
225 Main Capitol Building
Harrisburg, Pennsylvania 17120

State Rep. Rosita Youngblood
5736 Greene Street
Philadelphia, PA 19144

Mayor John F. Street
City Hall, Room 215
Philadelphia, PA 19107

Councilman Michael A. Nutter
City Hall, Room 404
Philadelphia, PA 19107

Council President Anna Verna
City Hall, Room 405
Philadelphia, PA 19107

... I chose to live in this city...
... put up with...

made that choice...
community...
that...
the...
to...

April 11, 2006

Mr. Tad Decker
Chairman
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg, PA 17106-9060

Dear Mr. Decker: *Tad,*

As long-time residents of East Falls who collectively have more than 50 years of experience as educational leaders in this community we are writing to express our belief that the proposed TrumpStreet Casino and Entertainment Complex as a detriment to the community, the region, and in particular, the students. We are opposed to the location of the proposed facility on the former Budd Co. site.

Although the project is proposed on a former industrial site, the area that would be affected is largely residential. Without a casino and entertainment complex, the roads around the site are already heavily congested. At our respective institutions, Philadelphia University and The William Penn Charter School (two of the oldest institutions in the area), we have conducted traffic studies to help alleviate perennial traffic problems, particularly on Henry Avenue, which feeds the Budd Co. site. From our professional lives, we know that adding additional traffic on this busy road at a time when both Penn DOT and the City Streets department are working with community members to find traffic calming solutions will only exacerbate a difficult situation and be both an inconvenience and a danger to those trying to reach our respective campuses.

Although we write as private citizens, our life-long experiences as educators also inform our thinking about the long-term consequences of legalized gambling on the thousands of students who choose East Falls for their education. We believe that inviting many of the behaviors associated with and attributed to gambling would have a devastating impact on students at the public schools immediately nearby as well as the private institutions where we have made our careers.

In its March 2, 2006 written comments to the applicant's impact report, the Multi-Community Alliance (MCA), which has broad representation from community and civic groups, makes many strong arguments against such a facility in East Falls. What is most

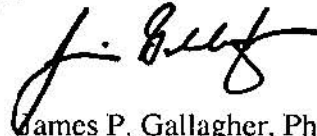
Certainly, there are residents who seek the *promise* of employment, but we believe that the long-term impact on a section of the city that is strategically and successfully developing for the future would be devastating and irreversible. The report by the casino advocates ignores the very positive developments in this area including commercial development along Ridge Avenue as well as the vastly improved public housing options. The City of Philadelphia cannot afford to destroy a prized community.

We urge you to vote against the proposal for the TrumpStreet Casino and Entertainment Complex.

Best wishes,



Earl Ball, Ed.D.



James P. Gallagher, Ph.D.

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

18 April, 2006

Dear Sirs,

As a resident of East Falls, I would like to express my strong opposition to the building of TrumpStreet in the East Falls/Nicetown area. There are several reasons why the alternative casino sites would be vastly preferable for Philadelphia: they would yield higher revenue, provide more jobs, and attract more tourists because of the proximity of other tourist attractions (hotels, motels, restaurants, entertainment). The areas bordering the proposed Trump site are residential and do not provide these services.

I feel strongly that this residential area is not an appropriate site for a casino, either for the local residents or for the city as a whole.

Thank you for your attention,

Frances Jueds

Frances Jueds

May 1, 2006

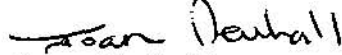
Pa. Gaming Control Bd.
P.O. Box 69060
Harrisburg, Pa. 17104-9060

Dear Sirs,

As a resident of East Falls, I would like to express my strong opposition to the building of Trump Street in the East Falls/Nicetown area. There are several reasons why the alternative casino sites would be vastly preferable for Phila.: they would generate higher revenue, provide more jobs, and attract more tourists because of the proximity of other tourist attractions (i.e. hotels, motels, restaurants entertainment, etc.) The areas bordering the proposed Trump site are residential and do not provide these services.

I feel strongly that this residential area is not an appropriate site for a casino, ~~either~~ for the local residents or for the city as a whole.

Thank you for your consideration of this matter.

Sincerely, 
Joan Newhall

27 April 2006

Mr. Tad Decker, Chairman
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg PA 17106-906

RE: **OPPOSITION TO GAMING AT THE BUDD SITE**

Dear Mr. Chairman:

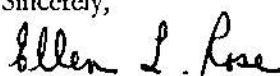
The slots facility proposed by Preferred Properties and the Trump Organization for the former Budd Plant property ("Budd Site") is likely to cause more harm than good. My objections are as follows:

- Gambling is not an appropriate anchor for neighborhood commercial districts; It is not consistent with plans to provide badly needed goods and services to nearby neighbors.
- Promises of economic benefit to small shop owners are unconvincing. I fear that businesses imported to service the gambling crowd will hurt independently owned businesses in my area.
- While jobs have been "promised" to local residents, I am not convinced that young people in my neighborhood will qualify, or that the jobs will be other than dead-end, low-paying positions.
- Studies have linked casinos to increasing social problems, such as addictive behavior, financial irresponsibility, family neglect, and crime. My neighborhood cannot tolerate this erosion.
- 24/7 activity will be disruptive; studies have indicated increases in traffic of 215-233%. Traffic will pass residences, schools, parks and churches, endangering and inconveniencing neighbors.
- Philadelphia needs more affordable housing to attract middle income families. Speculation and tax increases will force older folks from their homes, and decrease opportunities for first-time home-buyers.
- Inadequate access/egress might necessitate taking additional property to accommodate casino traffic and service facilities. This is unacceptable.

I urge the Pennsylvania Gaming Control Board to consider these objections carefully in reviewing proposals from developers, especially since I understand that nearly 70% of the respondents to written surveys circulated in nearby communities share my concerns.

THE BOTTOM LINE – The Budd Site should be used for commercial and residential development that will enhance the quality of life in our neighborhoods, not undermine it. Gambling simply doesn't fit the picture.

Sincerely,



Ellen L. Rose

March 15, 2006

Mr. Tad Decker, Chairman
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg PA 17106-906

RE: ***OPPOSITION TO GAMING AT THE BUDD SITE***

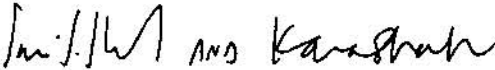
Dear Mr. Chairman:

The slots facility proposed by Preferred Properties and the Trump Organization for the former Budd Plant property ("Budd Site") is likely to cause more harm than good. My objections are as follows:

- Gambling is not an appropriate anchor for neighborhood commercial districts; It is not consistent with plans to provide badly needed goods and services to nearby neighbors.
- Promises of economic benefit to small shop owners are unconvincing. I fear that businesses imported to service the gambling crowd will hurt independently owned businesses in my area.
- While jobs have been "promised" to local residents, I am not convinced that young people in my neighborhood will qualify, or that the jobs will be other than dead-end, low-paying positions.
- Studies have linked casinos to increasing social problems, such as addictive behavior, financial irresponsibility, family neglect, and crime. My neighborhood cannot tolerate this erosion.
- 24/7 activity will be disruptive; studies have indicated increases in traffic of 215-233%. Traffic will pass residences, schools, parks and churches, endangering and inconveniencing neighbors.
- Philadelphia needs more affordable housing to attract middle income families. Speculation and tax increases will force older folks from their homes, and decrease opportunities for first-time home-buyers.
- Inadequate access/egress might necessitate taking additional property to accommodate casino traffic and service facilities. This is unacceptable.

I urge the Pennsylvania Gaming Control Board to consider these objections carefully in reviewing proposals from developers, especially since I understand that nearly 70% of the respondents to written surveys circulated in nearby-communities share my concerns.

THE BOTTOM LINE – The Budd Site should be used for commercial and residential development that will enhance the quality of life in our neighborhoods, not undermine it. Gambling simply doesn't fit the picture.

Sincerely, 
Samir and Kara Shah

March 11, 2006

Mr. Tad Decker, Chairman
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg PA 17106-906

RE: *OPPOSITION TO GAMING AT THE BUDD SITE*

Dear Mr. Chairman:

The slots facility proposed by Preferred Properties and the Trump Organization for the former Budd Plant property ("Budd Site") is likely to cause more harm than good. My objections are as follows:

- Gambling is not an appropriate anchor for neighborhood commercial districts; it is not consistent with plans to provide badly needed goods and services to nearby neighbors.
- Promises of economic benefit to small shop owners are unconvincing. I fear that businesses imported to service the gambling crowd will hurt independently owned businesses in my area.
- While jobs have been "promised" to local residents, I am not convinced that young people in my neighborhood will qualify, or that the jobs will be other than dead-end, low-paying positions.
- Studies have linked casinos to increasing social problems, such as addictive behavior, financial irresponsibility, family neglect, and crime. My neighborhood cannot tolerate this erosion.
- 24/7 activity will be disruptive; studies have indicated increases in traffic of 215-233%. Traffic will pass residences, schools, parks and churches, endangering and inconveniencing neighbors.
- Philadelphia needs more affordable housing to attract middle income families. Speculation and tax increases will force older folks from their homes, and decrease opportunities for first-time home-buyers.
- Inadequate access/egress might necessitate taking additional property to accommodate casino traffic and service facilities. This is unacceptable.

I urge the Pennsylvania Gaming Control Board to consider these objections carefully in reviewing proposals from developers, especially since I understand that nearly 70% of the respondents to written surveys circulated in nearby communities share my concerns.

THE BOTTOM LINE – The Budd Site should be used for commercial and residential development that will enhance the quality of life in our neighborhoods, not undermine it. Gambling simply doesn't fit the picture.

Sincerely,


Steve Tucker

DRAFT REGULATIONS COMMENT FORM

Please complete all of the fields below before printing:

DATE 05/23/2006

ADDRESS 1

SECTION # OR
SUBJECT East Falls Against Trump Street

ADDRESS 2

FIRST NAME Samir

CITY

LAST NAME Shah

STATE

ORGANIZATION
NAME Residents of East Falls (No organization)

ZIP CODE

EMAIL ADDRESS

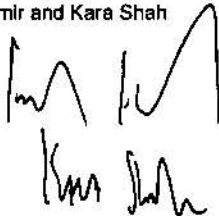
COUNTY Philadelphia

TELEPHONE

COMMENTS

We are writing to protest the Trump Street proposal in the East Falls/Nicetown area. This is a residential neighborhood that includes a University, two high schools, several elementary schools and several churches that will be subject to the woes brought to the area by the casino. Our concerns include increased traffic, increased crime, increased noise, and loss of revenue by local businesses that the casino will likely bring to the area. We, like many of the area residents, OPPOSE the Trump Street casino.

Sincerely,
Samir and Kara Shah

The image shows two handwritten signatures in black ink. The top signature is for Samir Shah, and the bottom signature is for Kara Shah. Both signatures are stylized and cursive.



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:

David G. McClenahan

Address:

Telephone:

Organization, if any: East Falls Presbyterian Church & East Falls

Employer:

Historical Society

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

please see the attached letter

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

June 2, 2006

Reference: Trump Casino in East Falls

Subject: **Please don't allow this to happen!**

Gentlemen

I appeal to you to put aside politics, pressure, star struck eyes and fantasy and vote against placing a casino, especially one supported by Donald Trump, in my neighborhood of East Falls, Philadelphia.

I am a lifetime resident of this wonderful community. It has been my home and my life. I am also a lifelong member of the East Falls Presbyterian Church and a charter member of the East Falls Historical Society. **A casino has no place here.**

I truly hope that the Board and the Governor are intelligent enough to see through a person like Donald Trump. That man has made his life and his abhorrent lifestyle at the expense of thousands, if not millions, of people. Money and personal aggrandizement are his only motives. He is a huge success being Donald Trump. He is greatly questionable being a business man. He is a total failure being a citizen.

How disappointing to believe that a number of people that I gave more credit to, have become part of his exploitations. These include Pat Croce, Ed Rendell (a former neighbor and probably a former hero) and any of the members your board that might vote for him.

If you believe the promises; If you think that this project will do anything permanent and substantial to improve life to the residents of East Falls, Nicetown and other surrounding neighborhoods; If you would allow noise, lights, traffic, and the horrors of gambling in your neighborhood, I say vote for this and then have the courage to come to my house and tell me how your neighborhood and your house is similarly blessed.

When it comes down to it, you have a great responsibility to represent all Pennsylvanians. You have no responsibility to Donald Trump. You do have a responsibility to be true to yourselves. See beyond the hype. See Trump for who he is. See the people of the neighborhoods pouring millions into the casinos and receiving only a small portion back. And there goes Trump back to New York with the lives, hopes and fortunes of my neighbors, neighbors staring at empty promises, empty wallets and zero faith in the government that you represent and in whom they trusted. I have heard the hopes and dreams of many of these more struggling neighborhoods. Can you look them in the eye and say life will be better with a casino in place of their schools and their hoped for shops and stores? Can you tell them that Donald Trump and his millionaire friends will not exploit them or that gambling will not negatively change their lives forever?

Your response is so simple and yet could be the greatest achievement of your professional and possibly your personal life. **Say NO to this travesty.**

May common sense and courage prevail.

Very Truly Yours,
David McClenahan



CC: **Governor Edward G. Rendell**
225 Main Capitol Building
Harrisburg, Pennsylvania 17120

State Rep. Jewell Williams
2224 N. Broad Street
Philadelphia, PA 19132

Councilman Michael A. Nutter
City Hall, Room 404
Philadelphia, PA 19107

Comments: Page 2 (continued)

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

David G. McClenahan



**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: _____

Address: _____

Telephone: _____ E-mail: _____

Organization, if any: _____

Employer: _____

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

My wife and I purchased our home in East Falls in August of 2001. Since becoming members of the community we have been active in getting to know our neighborhood and its people. Shortly after moving in, we became Block Captains for PMBC (Philadelphia More Beautiful Committee). This allowed us to become very familiar with neighbors and their wishes for where they live. Once the Trump Street Casino was proposed to be down the street from our house

Comments: Page 2 (continued)

clear. We do not want a Casino here. I have to admit, I have never gambled in a Casino. When I first heard of proposal, I thought of a set of neighbors. I had met during the 2004 Presidential Election Campaign. I took part in a campaign to educate people about their voting rights and to make sure they had the opportunity to vote on election day. One of the areas in East Falls that I was responsible for was Roberts Avenue and Deacon Street. These were the closest people I know of that would be impacted by the proposed site. These people had become my friends and if they were for the proposal, I would back them. However, I found that everyone I talk to is against there being a Casino in our neighborhood.

I, Michael Sparks 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: Jean Boles

Address: _____

Telephone: _____

Organization, if any: _____

Employer: HUP ER

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

At this point, I do not believe that a casino at the Bod site would be a positive influence in this neighborhood. There are a couple of reasons. I live on the corner of Fox and Penn, it is a very busy street. At times, this street is frustrating and dangerous for me and my family. Many motorists who drive down the street believe they are still on Roosevelt Blvd, they have little regard that this is a neighborhood with families. Another reason that a casino is not in our best interest is that I believe the city of Philadelphia is not "really" embracing the entire neighborhood. Where is there support? Would the

Comments: Page 2 (continued)

their support be there for a lifetime of a
examples of support needed would be crime, hood
issue in Philadelphia; traffic and future bus
that would be built because of gaming.

I worked in Atlantic City for 15 yrs. Most
those years in the casino industry. I saw first
hand the city changes. Most of the small
left, most of the residents left or where

faced to leave. and an increase in ~~blow~~ classes
just to name a few of the changes.

Please, we are just beginning to have
a rebirth in East Falls and a casino is
just not part of what a family neighborhood
picture.

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

Jean Zales RNBSU



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: NANCY PONTONE, CPA

Address: _____

Telephone _____

Organization, if any: _____

Employer: PENNSYLVANIA ACADEMY OF THE FINE ARTS

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

I live on Midvale Ave and the traffic is already too much. A 233% increase will be unbearable - noise, air pollution, accidents, less safe for pedestrians.

Property values in East Falls have increased as people have discovered what a livable community it is. This trend will reverse itself with a casino for a neighbor.

Two universities and an historic Friends school are in East Falls. Casinos are contrary to the aims of these institutions and are a bad

Comments: Page 2 (continued)

The Budd plant area has already attracted new development for Temple University and the Salvation Army. It can do better than impose a casino on these noble organizations.

Build a casino on Henry Avenue and you'll ruin a striving Philadelphia community.

Thank you.

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

5/31/06



**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: Cynthia Kishinchand

Address: _____

Telephone: 6

Organization, if any: _____

Employer: retired

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

~~See attached letter~~

~~See attached articles~~
in The Fallser. Please
review thoroughly.

Comments: Page 2 (continued)

See attached ~~letter~~
Fellser. I strongly
agree with the points
made regarding all the
negative aspects of the
Cruz proposal.

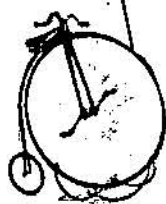
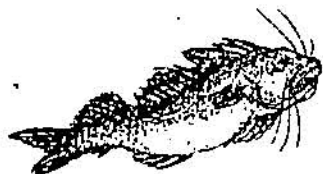
I, Cynthia Kishinchand, verify that the information contained in this written
comment is true and correct to the best of my knowledge and belief.

Cynthia Kishinchand June 2, 2006

THE FALLS



NEWS & EVENTS FOR THE EAST FALLS



Watch the Bike Race in East Falls

Come to the annual East Falls Annual Bike Race Block Party on Sunday, June 11. Join your neighbors on the scenic banks of the Schuylkill River to watch world-class bicyclists race up and down Kelly Drive.

The block party will be held from 9am 'til 2pm, on Midvale Avenue at Ridge and Kelly Drive, which will be closed till the last biker finishes. Local eateries will feature food booths and

there will be a health fair. Plan to bring your blankets and lawn chairs and grab a prime viewing spot along Kelly Drive for this exciting race, featuring teams of elite riders from the U.S. and abroad making 10 laps around the city.

You can get your 2006 souvenir bell to ring as the peleton goes by – an East Falls tradition. There will be a fire truck for kids and a band with live music.

Trump Changes Plans... Ever Heard of French Lick?

by Julie Camburn

There are five proposals for the two slots parlors that will be built in Philadelphia.

In May, the Philadelphia Daily News, PennPraxis, WHYY and the Design Advocacy Group of Philadelphia sponsored a public design forum, providing an opportunity for everyone to see the proposed design/concept for each casino and hear a panel of

supposedly, that its new design will reflect the industry of the past with hard surfaces and lots of chrome. There were no site plans, no renderings, no elevations, and no floor plans. There was an aerial view of the site and some vague sketches.

The casino's presenter said that Trump was redesigning its project to reflect community concerns. He stated that Trump was going to be honest about being a casino. It will not

State Official to East Falls'



Photo/THE FALLSER: courtesy E. Goppelt, Hallwatch.org

by Julie Camburn

Philadelphia is slated to get two of the 14 gaming facilities proposed for the Commonwealth.

Not everyone is embracing the concept, and no one, except the State Legislature, had any say. Act 71, which gave certain legislators and the Governor power to appoint members for the newly created Pennsylvania Gaming Control Board (PGCB), was an after-hours vote and never a referendum for the voters to approve or decline.

There are five proposals, each with its own site, for the two casinos slated to be built in Philadelphia. Along Dela-

proposed casino in community.

The MCA is a group of organizations representing five (5) neighborhoods closest to and most impacted by the proposed site: East Falls, SouthWest Germantown, Nicetown, Tioga and Allegheny/Huntington.

At all meetings held through all surveys conducted by the MCA's residents, the overwhelming opposition to a casino at the intersection of Roberts Avenues.

In fact, at the preliminary MCA's poll revealed the overwhelming opposition to a slots parlor, with the significant opposition

New Trump Plan cont'd

(continued from front page)
splinter the Multi-Community Alliance (MCA) by making deals and promises with those organizations which will sign its Community Benefits Agreement (CBA) and is enlisting elected officials to help. The MCA is a 26 member organization of community organizations that have joined together because of their concerns about the slots parlor. It includes the East Falls Community Council (EFCC), East Falls Business Association (EFBA) and East Falls Development Corporation (EFDC).

The MCA's position has been, and continues to be, that it wants to make the best of the situation if a slots parlor is approved for a parcel of land directly behind the Randolph Career Academy at Henry and Roberts Avenues.

The MCA had begun negotiations with Trump but Trump broke off those negotiations when the MCA refused to agree to back down from its opposition to the proposal. The CBA Trump is pushing (signed ~~as we go to press by Allegheny West Foundation and Tioga United~~) is a watered-down version of what was negotiated with the MCA's representatives.

Both the EFCC and the EFBA have been charged by their memberships to oppose the Trump proposal. Their leaders have been gathering information about Trump and his casinos. They have also focused on possible traffic problems, increase in crime, and the realization that the Trump team has been less than forthcoming about its past.

"French Lick" Look-Alike?

Consider this...The resort of French Lick, Indiana made the news when Trump Hotels

the Cincinnati Post: Trump Hotels President Scott Butera said, "The financial prospects for a casino in French Lick have changed since the time we were awarded the project. The tax burdens have become more onerous, and the proposition for additional gaming facilities in Indiana appears eminent."

In Pennsylvania, the State will take 52% of the revenue, 34% from "Category 2" casinos (see table on page one), and there will be 13 additional gaming venues—could that be any better than in Indiana?

As a result of the Trump pull-out, a gaming facility for French Lick was delayed for months as the Indiana Gaming Commission recovered.

Meanwhile, THRC filed for bankruptcy, reorganized and changed its name – Trump Entertainment-- all past troubles are supposed to be behind the group. Yet the same Trump VP, Robert Pickus, who was Trump's representative at French Lick, and who represented intent to develop that resort, is now in Pennsylvania making promises for jobs and revenue and touting community support, similar to what was done in front of the Indiana Gaming board.

While the corporate name may have changed, it is still the same people involved who are making representations to the Pennsylvania Gaming Control Board.

The Gaming Control Board should have serious doubts whether Pennsylvania will get the highest possible revenue generation if it selects Trump Entertainment Resorts, Inc. There is good reason for this concern. Trump backed out after being selected in Indiana in a competitive process

of Public and Environmental Affairs, hired to assist the Indiana Gaming Commission in performing economic impact, fiscal impact, financial, management, and other analyses to assist the Commission in renewing the riverboat casino licenses. The Center prepared annual evaluation reports for Trump's operations after 8 years. (These reports are available on the Indiana Gaming Commission's website, www.in.gov/gaming/reports/.)

In its report in 2004, the Center reported: "Tight cash flows and a larger exposure to property deterioration in Atlantic City could cause available cash flow to be diverted to those properties or even to the development of new properties such as that in French Lick, Indiana, rather than to the maintenance and upgrading of the Gary facility."

Ultimately, Trump sold its Gary and other Indiana facilities.

The Pennsylvania Gaming Control Board should not take the risk of having a Philadelphia facility that will suffer the same lack of priority and underinvestment as Gary, Indiana.

Trump has incentives to keep the facilities in Atlantic City in better condition than a Philadelphia location. Pennsylvania has a tax rate on gaming of 52%. Just over the border, Trump operates two casinos in Atlantic City, taxed at only 9%. If Trump entices its gamblers out of the Philadelphia parlor (a "convenience" casino at best) and into its New Jersey parlors ("destination" with all the accoutrements), the benefits to Trump are clear. The consequence would be lost revenue to Pennsylvania, not to Trump.

Not one of Trump's Phila-

Just as in Indiana v. Pennsylvania should be considered. Trump's Atlantic City will draw capital away from Philadelphia. Return on every dollar in New Jersey is significantly higher there. Pennsylvania should not gamble by giving preference to investments in New Jersey.

Philadelphia's success that the number of jobs created by Trump is thousands any of the five gam-



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: SHARON B. JAFFE

Address: _____

Telephone: _____

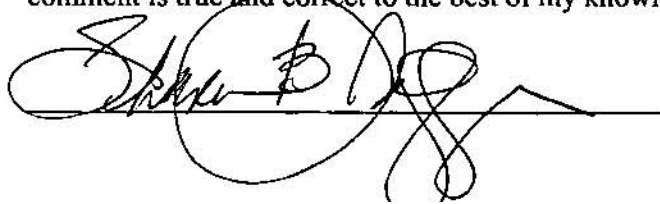
Organization, if any: EAST FOCUS Community Council

Employer: SELF

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

Comments: Page 2 (continued)

I, Sharon B. Jaffe 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 cursive script, appearing to read "Sharon B. Jaffe", written over a horizontal line. The signature is highly stylized with large loops and flourishes.

BEFORE THE PENNSYLVANIA GAMING CONTROL BOARD

**In re: Application of Keystone Redevelopment Partners, LLC,
d/b/a TrumpStreet Casino & Entertainment Complex, for
a Category 2 Slot Machine Operator License in Philadelphia County**

Public Comments by the East Falls Community Council

**Sharon B. Jaffe
President
East Falls Community Council**

Dated: June 1, 2006

The East Falls Community Council is a membership-based non-profit organization that represents the neighborhood of East Falls in Philadelphia, Pennsylvania. The EFCC has regular public meetings and duly elected officers. The EFCC has held several meetings regarding the proposal submitted to the Pennsylvania Gaming Control Board by the Keystone Development Group. Time after time, the community has indicated that it is opposed to this proposal. Over 12,000 people live in East Falls. Over one-half of the area within a one mile radius of the proposed Keystone slots parlor is the neighborhood of East Falls.

At the Philadelphia public hearings on April 10, 11 and 12, 2006, residents from East Falls made up the largest number of people testifying from a neighborhood about any of the five Philadelphia proposals. Residents consistently voiced opposition to the Keystone Group's Plan. The EFCC is submitting this Supplemental Written Comment for the purpose of providing the Board with additional facts and information. The EFCC is a member of the Multi-Community Alliance (MCA) and fully supports and echoes their comments.

1. Request for Extension of Time because Keystone's application is being modified

The EFCC hereby requests an extension of time to comment on the application of Keystone Development because the application has been modified and the EFCC has not been provided with the latest changes or latest submission.

On May 24, 2006, the Philadelphia Daily News, the Design Advisory Group and Penn Praxis held a forum at the Pennsylvania Convention Center to provide an

opportunity for input on the designs of the five proposed slots parlors in Philadelphia. The developers displayed their drawings and then gave a PowerPoint presentation to the assembled public.

The Keystone Group's presentation was conspicuously scant - it only had an aerial photo of the location with some pencil sketches. Keystone did not display a site plan or floor plans. The four other developers all showed designs with overall site plans, floor by floor layouts and renderings of the proposed buildings. The Keystone Group, on the other hand, said that the design was being modified from the original design submitted to the Gaming Control Board. The main entrances might be moved, although this was not entirely clear.

Based on this current status, the EFCC requests an extension of two months after the new designs are submitted to the Gaming Board. In the alternative, the EFCC requests that the Keystone application be rejected because it is incomplete – they are required to have plans and they do not have them at this date.

2. The prior history in front of a State Gaming board demonstrates that the Trump group may not be the right choice for Pennsylvania:

The EFCC contends that the Keystone Group's prior history should give rise to a concern that the Group may not be the right choice.

The resort of French Lick, Indiana made the news when a Trump team was selected by the Indiana Gaming Commission in July 2004 to develop a gaming facility there. At the time, the Indiana Gaming Commission chose Trump over two other competitors because it was impressed with strong community support and the Trump

team's promises for jobs and revenue. Only eight months later (and **only one year ago**), in April, 2005, the Trump pulled out and told the Gaming Commission it would not follow through. Even though it had won the competitive process, it was walking away.

This event made the Press. Ironically, at the time of selection and before the deal collapse, one of the Gaming Commission members who chose Trump said, "Historically, Donald Trump has been counted down and out many times," Commissioner Thomas F. Milcarek said, "and he's always bounced back." Two commissioners did have foresight and voted against awarding the contract to Trump because they said they had concerns about the company being able to live up to what it offered. It turns out they were right, but in the minority. As a result of the pull out, the gaming facility was delayed for months as Indiana Gaming Commission recovered.

Since that time, there has been a bankruptcy and reorganization and all past troubles are supposed to be behind Trump. Yet it is the same Bob Pickus, who was Trump's representative at French Lick, and who represented intent to develop that resort, who is now in Pennsylvania making promises for jobs and revenue and touting community support, similar to what as was done in front of the Indiana Gaming board.

3. The Keystone Group has Conflict of interest with its Atlantic City holdings-- Pennsylvania should not gamble with Trump

The Gaming Control Board should have serious doubts whether Pennsylvania will get the highest possible revenue generation if it selects Trump Hotels and Resorts. There is good reason for this concern. Trump backed out after being selected by the Gaming Commission in Indiana, in a competitive process similar to Pennsylvania's,

because it decided to give priority to its Atlantic City investments. Likewise, here, the company has an incentive to invest in Atlantic City and to not spend its dollars investing in Philadelphia. Furthermore, Trump left Indiana because it lost a legal case, owing the State of Indiana \$18.1 in back taxes for gaming. Why should Pennsylvania gamble on Trump when it first introduces gaming in our State?

It is instructive to again look at Indiana, this time in Gary, for how the problem of Atlantic City competition can be manifested. The Gary site was evaluated by the Center for Urban Policy and the Environment (Center) of Indiana University's School of Public and Environmental Affairs, which was hired to assist the Indiana Gaming Commission in performing economic impact, fiscal impact, financial, management, and other analyses to assist the Commission in renewing the riverboat casino licenses. The Center prepared annual evaluation reports for Trump's operations as well a report after 8 years. (These reports are available on the Indiana Gaming Commission's website (www.in.gov/gaming/reports/).

In its last report in 2004, the Center reported that:

"The owner of this license is experiencing financial difficulties and, unless the proposed restructuring is completed, is likely to continue facing a serious threat to its economic viability in the coming years. In the immediate future, all the Trump facilities face severe competitive challenges and may suffer from associated cash flow problems, especially if a restructuring of its high cost debt is not successful. The vulnerability of the parent is substantial in the near term. The parent company was extraordinarily levered at the end of 2003 and had the lowest level of revenues relative to assets. Relative to the peer companies, TCHR (Trump Casino, Hotels and Resorts) had an especially low level of cash flow profitability given the amount of debt it had to service, with a fixed charge coverage ratio of only 1:1. The success of the recapitalization is critical to the continued viability of the

business. While the financial viability of THCR is at significant risk until the recapitalization of the parent is completed, the successful recapitalization should put the whole THCR operation on much stronger footing. *Tight cash flows and a larger exposure to property deterioration in Atlantic City could cause available cash flow to be diverted to those properties or even to the development of new properties such as that in French Lick, Indiana, rather than to the maintenance and upgrading of the Gary facility,*" (emphasis added).

Ultimately, Trump sold the Gary facility. The Gaming Control Board should not take the risk of having a Philadelphia facility that will suffer the same lack of priority and underinvestment as Gary, Indiana.

Trump has incentives to keep the facilities in Atlantic City in better condition than a Philadelphia location. Pennsylvania has a tax rate on gaming of approximately 53%. Just over the border, Trump operates two casinos in Atlantic City, taxed at only about 9%. If Trump entices their gamers out of the Philadelphia parlor and into their New Jersey parlors, the benefits to Trump are clear. The consequence would be lost revenue to the State and not Trump. None of Trump's Philadelphia competitors own gaming facilities in Atlantic City and face that same incentive, which could be harmful to the State.

The Gaming Board should be alerted to the fact that recent revenue reports from the Casinos in Atlantic City show Bally's and the Borgota ahead of Trump's Taj Mahal. Furthermore, the Trump Marina is almost at the end, ranking 11th of the 12 casinos. Atlantic City casino revenue is largely driven by slots machines, which account for nearly 74% of revenue (Inquirer May 11, 2006).

Just as with Indiana, Pennsylvania should be concerned that Trump's Atlantic City casinos will draw capital resources away from Philadelphia. The return on every dollar invested in New Jersey is significantly higher there, as opposed to here. Pennsylvania should not gamble with Trump giving preference to its investments in New Jersey.

4. They Group has filed a Community Benefits Agreement without East Falls as a signatory – this Agreement should be rejected and is not valid.

The proposed location of Trumpstreet faces East Falls. The closest residents to the location are East Falls residents. Yet, the EFCC is not a signatory to the Community Benefits Agreement (CBA) being filed by the Keystone Group. Clearly this is not a valid or proper CBA. It should not be recognized.

Pennsylvania has a long history of respecting a citizen's right to protest and dissent. In fact, the very foundations of this nation are embedded in this notion, as memorialized in our National Constitution, drafted in our State. Citizens and taxpayers should not be penalized for engaging in their right to petition the government and to request that the slots parlor not be located in their residential neighborhood. By sanctioning the alleged CBA which the Keystone Group is filing, the Gaming Control Board would be penalizing those citizens who dissent.

The CBA has not designed to operate in this way. Instead, any CBA should be a true agreement regarding the benefits to be distributed fairly amongst all residents, regardless of whether they agree or disagree with the Keystone Group's plans.

The Keystone Group's CBA should be rejected as invalid.

East Falls Community Council
 Signatures to Petition in **OPPOSITION** to
 GAMING AT THE BUDD SITE TRUMP/KEYSTONE TEAM

?	First	Last	Address	Zip (191+)	Phone
	John	Abhey			
	Margaret	Allen			
	Rosa	Allisa			
	Gilda	Anusky			
	Judith	Beck			
	Judith	Beck			
	Steve	Bell			
	Jean	Benjamin			
	Frances	Bourne			
	Anne	Boyson			
	Monica	Brachter			
	Patricia	Branch			
	John	Brooke			
	Allan	Brown			
	R.S.	Brown			
	Carrie	Brownell			
	Stephen	Buckley			
	Willie	Burgess			
	Dorothy	Buzniak			
	Julie	Camburn			
	Kirstin	Carangi			
	Julie	Carroll			
	Alisha	Carson			
	Allen	Carson			
	Reginald	Carter			
	Alfred	Clements			
	Rebecca	Coer			
	John	Connelly			
	Colleen	Contrisciane			
	Dorothy	Cooper			
	Cory	Cowles			
	Caryn	Cross			

East Falls Community CouncilSignatures to Petition in **OPPOSITION** to**GAMING AT THE BUDD SITE TRUMP/KEYSTONE TEAM**

	?	First	Last	Address	Zip (191+)	Phone
		John	Cugini			
		Greg	Curci			
		Nan	Daniels			
		Charles	Day			
		Christopher	Day			
		Harriet	Day			
		Jane	Deary			
		Mark	DeBevoise			
		Steve	Devito			
		Charles	Devlin			
		Jaime	Donegan			
		Supreme	Dow			
		Danielle	DuCoeur			
		Joe	Durano			
		Joe	Durrance			
		Sheila	Eatmon			
		Mary	Edwards			
		Christine	Edwin			
		John	Edwin			
		Joe	Elabd			
		Sonia	Elabd			
		Monique	Ellison			
		Laura	Eyring			
		Salvatore	Fede			
		Herbert	Felder			
		Diane	Fiske			
		Gabriel	Flaxman			
		Eileen	Flynn			
		Sandra	Foehl			
		Catharine	Franklin			
		Julie	Fraser			
		Patricia	Fries			

East Falls Community CouncilSignatures to Petition in **OPPOSITION** to**GAMING AT THE BUDD SITE TRUMP/KEYSTONE TEAM**

?	First	Last	Address	Zip (191+)	Phone
	Mary Jane	Fullam			
	Eileen	Furlong			
	George	Gaynor			
	Bernadette	Geller			
	Evan	Geller			
	Edith	Giese			
	Ernest	Giese			
	Ernie	Giese			
	Connie	Gillespie			
	John	Gillespie			
	Kellie	Gilray			
	Elaine	Goffredo			
	Oscar	Goodwin			
	Thomasina	Goodwin			
	Tom	Gouken			
	Jim	Graham			
	Karen	Graham			
	Gale	Gray			
	Marjorie	Greenfield			
	Bridget	Griffin			
	George	Grigonis			
	John Eric	Hanson			
	Eula Ann	Harris			
	Andrea	Havens			
	Mark	Havens			
	Julia	Hayes			
	Glenna	Hazeltine			
	Beth	Heenan			
	Emma	Henderson			
	Charles	Hendricksen			
	Philip	Hineline			
	William	Hoffner			

East Falls Community Council
 Signatures to Petition in **OPPOSITION** to
GAMING AT THE BUDD SITE TRUMP/KEYSTONE TEAM

?	First	Last	Address	Zip (191+)	Phone
	Ernst	Hohmunn			
	Shirley	Hopes			
	Diane	Howell			
	Bernard	Hughes			
	Vivian	Hughes			
	Ingrid	Hyder			
	Ingrid	Hyder			
	Jennifer	Hyder			
	Bobby	Jackson			
	Bobby	Jackson			
	D.	Jackson			
	Joyce	Jackson			
	Joyce	Jackson			
	Sarah	Jackson			
	Sharon	Jaffe			
	Elaine	John Lane			
	Dowd	Johnson			
	Charlotte	Jones			
	Jasper	Jones			
	Thomas	Jones			
	Frances	Jueds			
	Kay	Keenze			
	Marvin	Keenze			
	Dorothy	Kelly			
	Darnell	King			
	Donald	King			
	Jacqueline	King			
	Cynthia	Kishinchand			
	Deborah	Klawitter			
	Mark	Klawitter			
	Charlotte	Kresovich			
	Elizabeth	Krispin			

East Falls Community Council
 Signatures to Petition in **OPPOSITION** to
GAMING AT THE BUDD SITE TRUMP/KEYSTONE TEAM

?	First	Last	Address	Zip (191+)	Phone
	Helen	Lacheen			
	Sarah	Lampe			
	Richard	Lampert			
	Ben	Landua-Beispil			
	Robyn	Langston			
	Juanita	Leysath			
	Liz	LiFever			
	William	Lloyd			
	Raymond	Lucci			
	Richelle	Luster			
	Jessica	Lutz			
	Steve	Lutz			
	Mr.	Lynch			
	Ms.	Lynch			
	Bruce	Marshall			
	Christine	Martin			
	Dwight	Martin			
	Linda	Martin			
	Thera	Martin Connelly			
	Mary	Mather			
	Paul	Matzko			
	Marian	McAllister			
	Kyia	McCall			
	Brenda	McCleary			
	Patricia	McCole			
	Diana	McDermott			
	Joan	McIlvaine			
	Jean	McWilliam			
	Mark	Menzies			
	Helen	Merton			
	Jane	Messick			
	Michelle	Miller			

East Falls Community CouncilSignatures to Petition in **OPPOSITION** to**GAMING AT THE BUDD SITE TRUMP/KEYSTONE TEAM**

?	First	Last	Address	Zip (191+)	Phone
	Vera	Miller			
	Vera	Millie			
	Wendy	Moody			
	Sabrina	More			
	William	Morris			
	Hazell	Moses			
	Leland	Moton			
	Leland	Moton			
	Margaret	Moton			
	Jenna	Musket			
	Theodora	Nediaikova			
	Joan	Newhall			
	Lisa	Ngyen			
	Susan	Nye			
	William	O'Brien			
	Beth	Onsley			
	Father David	Onsley			
	Alfred	Ortega			
	Franz	Ostertag			
	Mel	Owings			
	Suzanne	Penn			
	Mildred	Perkins			
	Barbara	Phillips			
	Anthony	Pipitone			
	Patricia	Pixley			
	Robin	Pixley			
	Kelly	Quist			
	Sandra	Radich			
	Majeedah	Rashid			
	Emilia	Rastrick			
	George	Reid			
	Zenobia	Reid			

East Falls Community CouncilSignatures to Petition in **OPPOSITION** to**GAMING AT THE BUDD SITE TRUMP/KEYSTONE TEAM**

?	First	Last	Address	Zip (191+)	Phone
	Vernon	Reynolds			
	Dee Dee	Risher			
	Marilyndia	Rogers			
	Shanley	Rogers			
	Ellen	Rose			
	Steve	Roser			
	Nick	Roush			
	James	Royal			
	Jean	Ruff			
	Clara	Rushing			
	Deonna	Rushing			
	Margaret	Sadler			
	Zaimah	Saleem			
	Linda	Saltford			
	Lucy	Salvucci			
	Robert	Sauer			
	Tom	Sauerman			
	Rosalyn	Sauser			
	Harris	Savin			
	Caleb	Schadt			
	Alan	Schindler			
	Suzanne	Schneider			
	Joseph	Scott			
	Kent	Scott			
	Scott	Scrivner			
	Elizabeth	Searles			
	Katharine	Seed			
	Ellen	Sheehan			
	Brian	Shovlin			
	Carolyn	Siegel			
	Monica	Siltman			
	Berdine	Smith			

East Falls Community CouncilSignatures to Petition in **OPPOSITION** to
GAMING AT THE BUDD SITE TRUMP/KEYSTONE TEAM

?	First	Last	Address	Zip (191+)	Phone
	Terraine	Smith			
	Bernadette	Soltis			
	Mike	Sparks			
	Noel	Sperry			
	Christina	Spolsk			
	Herbert	Stahl			
	Philip	Steinberg			
	Laura	Stroffolino			
	Josylan	Sturdivant			
	William	Sturdivant			
	Julianne	Sullivan			
	Eric	Swamberg			
	Kathryn	Swank			
	Gloria	Taylor			
	Lincoln	Taylor			
	Patsy	Taylor			
	Leon	Teagle			
	Joseph	Terry			
	Marian	Terry			
	Charles	Thomas			
	Charles	Thomas			
	Edith	Thomas			
	Wylie	Thomas			
	Jeff	Thompson			
	Mark	Tucker			
	Thomas	Uzzell			
	Joanna	Vaughan			
	Alex	Venaus			
	Millicent	Walker			
	Samira	Wards			
	Chris	White			
	Gerald	Widmann			

East Falls Community Council

Signatures to Petition in **OPPOSITION** to
GAMING AT THE BUDD SITE TRUMP/KEYSTONE TEAM

	?	First	Last	Address	Zip (191+)	Phone
		Ethel	Williams			
		Peter	Williams			
		Rosalyn	Williams			
		Leon	Woodson			
		Andrea	Wright			
		James	Wuenschel			
		Tayon	Wynder			
	?	Steeoanna	Wyne			
		Peter	Yeomans			
		Susan	Zingale-Baird			