

	Supporting Questions		Harrah's		Isle of Capri	
Site Suitability Criteria						
	Does hardscaping use a diversity of natural materials?	0	None mentioned	1	Yes, stones	1
	Are plantings irrigated in an environmentally responsible way?	0	None mentioned	1	Yes. Spray or drip irrigation.	0
	Do you plan to reuse storm-water/graywater for irrigation?	1	There is mention but no plans as yet.	0	None mentioned	0
	Average	0.4		0.8		0.2

* - As per the City of Pittsburgh's Environmental Planner

Table A3: Design Impact Criteria and Scores

	Supporting Questions		Harrah's		Isle of Capri	
Design Impact Criteria						
Compliance with zoning code	Are the facades transparent/ interactive with the streets/ public right of way?	1	Transparent, but not interactive (are willing to discuss it further).	5	On Centre Ave: transparent, but not interactive with street; on Fifth Avenue: transparent and active.	2
	Riverfront trail, landscape along trail, etc?	3	Yes (as per verbal conversation with Forest City).	0	Not Applicable	2
	Average	2		2.5		2
Site Context	Is the exterior consistent with the streetscape, context, scale, and character of the site and neighboring buildings?	4	Yes	0	No. 12-13 stories along Fifth Ave. where buildings are 4-5 stories.	4
	Is the density of building same as, higher than or desirable as that of neighboring buildings?	4	Yes	1	Density of casino is much higher (that of mixed use dev. is desirable).	2
	Average	4		0.5		3

	Supporting Questions		Harrah's		Isle of Capri		
Design Impact Criteria							
Non-gaming uses and public spaces	Does the plan include retail and restaurant space?	2	2-3 restaurants, 5 retail, 1 sports bar.	3	4-5 internal restaurants, 1 buffet, 2-3 fast food centers, 2-3 bars and 3 retail shops. Along Fifth Ave., there is retail and residential towards Pride Ave.	2	4 ba br
	Does the plan include other entertainment venues?	3	Yes. Winter garden (passive rec), multipurpose event center,	1	Yes. Multi event center (future spa).	3	Y ar cl
	Does the plan contain exterior public amenities such as plazas, landscaping, arcades, river walks and lighting?	3	Extension to the riverfront trail, marinas, landscaping, signage, street furniture.	1	Internal landscaped atrium/ water feature, but not accessible to general public. Street landscaping (parks, plaza as part of future market driven plan).	3	R a a
	Is there access/a link to other recreational uses?	4	Pedestrian and bike trail, marinas.	1	Existing Arena.	3	E ri
	Average	3.0		1.5		2.8	
Design approach	Is the design bold, contemporary and innovative?	3	Bold, contemporary, somewhat innovative.	4	Bold, contemporary and innovative, except for the fifth avenue façade.	1	B c ir
	Average	3		4		1	

	Supporting Questions		Harrah's		Isle of Capri		
Design Impact Criteria							
Building Facades	Is there transparency of street facades? What percentage?	2	Inadequate transparency.	4	Yes. Transparent on Centre Ave. (approx. 45%) and fifth avenue (approx 50%).	3	So riv fac no we
	Is there visual and physical connection to the building from public right of way?	1	Yes	4	Yes	1	Th co ne co
	Is the on-site parking visible from the street?	0	Yes, from Carson Street and the riverfront.	3	Yes, from Fifth Avenue.	2	Ye St
	Is the design of the parking structure integrated with casino and immediate area?	1	Yes, 2 underground stories and an 8 storied parking garage adjacent to casino (there is talk of treating the façade appropriately).	3	Yes, 8 storied garage beneath the casino. Phase 2 parking is wrapped with residential and retail uses on 5th Ave. and brick panels on Colwell.	3	Ye on
	Average	1		3.5		2.3	
Building materials	Primary materials are not stucco, EIFS systems, concrete block, wood or simulated wood products.	2	No. Not enough data on interior finishes.	3	No	1	No
	Building uses materials such as stone, metal, glass, concrete and brick	3	Building uses, brick, aluminum curtain wall, glass.	3	Building uses stone, brick, glass curtain wall, metal panels.	2	Bu sto bu

	Supporting Questions		Harrah's		Isle of Capri		
Design Impact Criteria							
	Are dead facades treated appropriately so as to reduce massing and scale?	2	Dead walls are animated with brick patterns and lighting.	3	Somewhat: metal framed openings, brick infill panels.	1	Ina dra
	Average	2.3		3		1.3	
Public Art	Will any portion of the development costs be devoted to public art created by a professional artist?	1	Talks about public art in public spaces (winter garden, Carson drive).	1	Yes. Use of public art (glass artwork) in the atrium.	0	No
	Average	1		1		0	
Spatial organization		2	Yes, except for access points from the riverfront trail.	3	Yes, dramatic entrance to casino.	3	Ye po (S co ac ca riv
	Average	2		3		3	
Design Team*	Has the design team designed other gaming facilities?	3	Yes, many gaming facilities.	3	Yes, gaming and hospitality facilities.	1	No de the
	Is the building designed by an architect?	1	Yes	1	Yes	1	Ye
	Has the design team won awards for excellence?	2	Few	4	Yes, many different categories.	2	Hi aw
	Is the design team competent to address urban design issues?	4	Yes, Calthorpe assoc	3	Yes, UDA	1	Ye

	Supporting Questions	Harrah's		Isle of Capri		
Design Impact Criteria						
	Are there minority and woman owned firms incorporated into this proposal?	1	Few	2	One, RRA associates	3
	Average	2.2		2.6		1.6
Environmentally friendly building design	Will the building have a green roof, incorporate stormwater run-off, graywater reduction measures??	3	Storm water measures have been addressed and there is consideration of part green roof.	2	Part green roof.	0
	Does the plan incorporate daylighting?	0	Requested but not provided	2	Partly	0
	Does the plan incorporate innovative measures to reduce heating and ventilating costs?	0	Requested but not provided	1	Yes, use of energy efficient fixtures	0
	What will be the thermal performance of buildings?	0	Requested but not provided	1	according to standards	0
	Is there a construction management plan? (disposing/ reusing excavated soil, demolition waste, etc)	0	Requested but not provided	2	Waste will be appropriately disposed. Will consider reusing construction/ demolition waste	0
	Average	0.6		1.6		0

	Supporting Questions		Harrah's		Isle of Capri		
Design Impact Criteria							
Utilities	Are the locations of loading and unloading docks and garbage disposal within the building?	2	Yes	1	Yes	2	Yes
	Are the docks visually and physically screened from public sight?	2	Yes	2	Yes	1	Vis and
	Are rooftop equipments adequately screened or concealed?	1	(Roof would incorporate material variations with part green roof).	1	Part green roof.	0	Re pro
	What is the location of the electrical substation/ transformer if any?	1	Utilities in the basement.	1	Behind Fifth Avenue retail.	0	Re pro
	Average	1.5		1.3		0.8	
Lighting and signage	On-site light pollution is minimized by fixtures that conceal the light source	0	Not mentioned.	1	Not adequate data.	0	No
	Garage lighting limits light spillage	1	(Pedestrian stairwells are glass and are illuminated to give effect of light towers)	0	Not adequate data.	0	No
	Sodium vapor fixtures are not used, metal halide fixtures instead	0	Not mentioned.	1	Yes	0	No

	Supporting Questions		Harrah's		Isle of Capri	
Design Impact Criteria						
	Is the exterior lighting very bold and flashy?	3	Yes	1	Not adequate data	2
	Does the signage comply with code requirements?	0	Inadequate data to draw deductions.	1	Will comply with City code requirements.	0
	Does the signage include lighting, LED?	1	Yes	0	Not adequate data	0
	Average	0.8		0.7		0.3

Table A4. Traffic Analysis Criteria and Scores

	Maximum Base Score	Sub-criteria
Traffic and Parking Evaluation Criteria		
Convenient Regional Highway Access	4	Direct Access To/From Regional Highways
		Recommended Improvements
		Developer Costs and Responsibility
		Action by Other Players
		Ease of Implementation
		Operating/Maintenance (Annual)
		Subtotal
		Average
Convenient Local Access by Car	3	Existing Local Street Capacity and Level of Service
		Future Local Street Capacity and Level of Service
		Existing Local Street Operational Efficiency
		Future Local Street Operational Efficiency
		Recommended Improvements?
		Developer Costs and Responsibility
		Action by Other Players
		Ease of Implementation
		Operating/Maintenance (Annual)
		Subtotal
		Average
Accessible by Public Transit	3	Are Existing Public Transit Services Adequate?
		Will 2008 Design Public Services be Adequate?
		Recommended Public Transit Improvements
		Costs and Developer Responsibility
		Action by Other Players
		Ease of Implementation

	Maximum Base Score	Sub-criteria	
Traffic and Parking Evaluation Criteria			
		Operating/Maintenance (Annual)	1
		Subtotal	1
		Average	2
Accessible to Pedestrians	1	Are Existing Pedestrian Travel Amenities Adequate?	4
		Will 2008 Design Year Pedestrian Amenities be Adequate?	4
		Pedestrian Safety and Circulation Management Plan	4
		Costs and Developer Responsibility	3
		Ease of implementation	2
		Action by other players	2
		Operating/Maintenance (Annual)	2
		Subtotal	2
		Average	3
Provides Adequate Parking On or Off Site	2	Does Parking Supply Comply with Zoning?	3
		Does Parking Supply Meet Peak Weekday Peak Weekend Demand?	3
		Is Displacement Parking Identified?	3
		Is Employee Parking On Site or Off Site?	3
		Is there any Impact on Adjacent Neighborhood Parking?	5
		Is Parking Layout and Access Adequate?	4
		Is There a Parking Management Plan	3
		Operating/Maintenance (Annual)	2
Subtotal	2		
		Average	3
Adequate Space for Bus, Taxi, and Other Common Carrier Transportation, including Loading and	3	Loading and Unloading On-Site	4
		Loading and Unloading Off-Site	4
		Adequate Porte-Cochere Operations on Site,	3

	Maximum Base Score	Sub-criteria
Traffic and Parking Evaluation Criteria		
Unloading		Including Taxi and Valet Storage Private Carrier Bus, Limousine, and Taxi Access and Parking Porte-Cochere Operations Management Plan Subtotal Average
Minimizes Potential for Traffic Congestion	4	Existing Intersection Level of Service 2008 Design Year Intersection Level of Service Existing Operational Efficiency 2008 Design Year Operational Efficiency Recommended Improvements Costs of Recommended Improvements Action by Other Players Ease of Implementation Operating/Maintenance (Annual) Subtotal Average

Table A5. Traffic Analysis Comments

Traffic and Parking Evaluation Criteria	Comments
Convenient Regional Highway Access	All three sites have varying levels of regional highway access, but Isle of Capri has the best access to their site. The Cross Town Expressway (I-579) is the major transportation route. Extending from the Veterans Bridge to the Liberty Bridge, it provides convenient access to SR-376. Access to I-279 and SR-65 requires the use of Grant Street and 7th Avenue. In respect to the Harrah's site, all regional access relies on Carson Street and the West End Bridge. Fort Pitt Bridge ramps provide access from I-376, I-279N, and PA-65. Majestic has access to I-279, including the HOV facility. Other routes near the site include SR-222 and the West End Bridge.
Convenient Local Access by Car	Isle of Capri site has many local roads with sufficient excess capacity to accommodate traffic. Avenue, Washington Place, Fifth Avenue, Forbes Avenue, Bedford Avenue, and Carson Street. However, the same roads that provide access to the IOC site have potential for peak period congestion at key intersections, pedestrian/vehicle conflicts, and parking issues. Harrah's site is directly served by Carson Street from the West End Circle. The West End Bridge. Direct access to the site is limited to a single arterial, Carson Street, which is experiencing peak period and event congestion. Majestic has direct access to the site via Carson Street, Ridge Avenue, Fontella Street, and Western Avenue. The various merges and one-way roadway configurations would limit local access to the MSC site via local roads are the same as those encountered at the IOC site.
Accessible by Public Transit	The IOC site is well served by public transit. Directly serving the site on Carson Street are three bus routes. The business district and neighborhoods in the east are three bus routes. Extension of the LRT on Fifth Avenue and Forbes Avenue. The site is also within a short walking distance to the LRT Station. Twelve percent (12%) of IOC's patrons and employees are expected to use public transportation. The Harrah's site is the best situated for maximum use of public transportation. The HSSC estimates that 15% of their casino patrons and 25% of their employees use public transportation. The Majestic site is not well served by public transit. Current transit is operated by Port Authority of Allegheny County (PAT) and the Beaver County Transit Authority. The site will have improved transit service in the future with the planned construction of the LRT project.
Accessible to Pedestrians	The Isle of Capri site is the most suitably located for convenient and safe pedestrian access. The majority of pedestrians walking to the IOC site would be downtown, Strip, and local residents and employees. IOC estimates that 2% of patrons and employees use public transportation. The site is the second most suitably located site for convenient and safe pedestrian access.

	<p>has assumed that pedestrians would typically come from downtown, Souths Heights. Harrah's estimates that 5% of their patrons and 15% of their employees will walk to the site. The Division believes that this estimate is too high compared with the other sites. Harrah's plans to extend the Three Rivers Heritage Trail along the north shore of the riverfront. The Division believes that this trail, if built, would provide full physical and visual access to the riverfront. Harrah's estimates that 5% of their patrons and 2% of their employees will walk to the site.</p>
<p>Provides Adequate Parking On or Off Site</p>	<p>IOC estimates that it will need 4,301 parking spaces for its patrons in the Port of Mobile. The casino would be at an off site location. The casino will displace approximately 1,300 parking spaces. IOC has identified 9,837 parking spaces in facilities within a 15 minute walk of the site. In the Uptown and Hill District neighborhoods, this Division is concerned that patrons will be tempted to park for free on these neighborhood streets. Harrah's would construct 600 spaces in a separate structure, and 600 spaces below the casino structure. In addition, 600 spaces owned by Forrest City Enterprises with the Station Square Entertainment Center. IOC is concerned that Harrah's may not have sufficient parking spaces to meet patron and employee demands. Majestic will build a new parking garage to meet their employee demands. 600 employee parking spaces will be provided off site at the Station Square. The MSC proposal will displace 1,100 current parkers.</p>
<p>Adequate Space for Bus, Taxi, and Other Common Carrier Transportation, including Loading and Unloading</p>	<p>IOC appears to have the most space for truck loading and maneuvering on the site. Staging of buses would occur at an off site location to be identified in the traffic report. Trucks will be provided on Centre Avenue. Trucks would be required to access the site from Centre Avenue. Harrah's is presumed to have all truck loading activities on site. In the traffic report regarding traffic access and circulation at the porte-cochere, IOC is concerned that Harrah's would provide separate loading areas for casino and restaurant use. IOC is presumed to take place on the site.</p>
<p>Minimizes Potential for Traffic Congestion</p>	<p>Private automobiles will be the predominant mode of travel to all three sites. IOC has recommended roadway infrastructure and capacity to accommodate the future casino traffic. There are concerns at several intersections but IOC has recommended roadway physical improvements to address these future impacts. Access to the HSSC site is constrained due to only one arterial roadway. IOC is concerned that the site. There are serious concerns regarding the future level of service of the site. Carson Street at Smithfield Street and at Arlington Avenue. MSC is the Lead Agency for the site. Local access to the site. Traffic flow on streets near the site is confusing due to conflicting traffic movements. MSC has proposed to reconstruct Reedsdale Street into a 4-lane street. IOC will install and improve traffic signals. The proposal to widen Reedsdale Street is a land use issue to resolve.</p>

Appendix B. Temporary Casino

An immediate temporary casino is proposed by Isle of Capri and is a possibility for both the Harrah's and Majestic developments. While these temporary facilities would be smaller than the permanent facilities (e.g., Isle of Capri is proposing only 1,500 slots, two restaurants and one bar) they would nonetheless have significant impacts on the City of Pittsburgh. These impacts would be both positive and negative, and are listed below.

Positive Impacts

- A temporary casino would be in operation sooner than a permanent facility. This would bring jobs and revenue to the City of Pittsburgh at an earlier date than a permanent casino. This impact would vary, depending on the size of the temporary casino.
- Temporary casinos are usually smaller than permanent facilities.

Negative Impacts

- There is the potential that the temporary casino could stall or displace the opening of a higher quality, permanent facility employing more people. This has happened in Detroit and other locations.
- A temporary casino would reduce the construction budget for the permanent facility, potentially compromising the quality of the permanent building.
- An unattractive, tent-like metal temporary facility (such as that proposed by Isle of Capri) would negatively impact the neighboring area and downtown.
- A temporary casino often displaces parking.
- A temporary casino would not be integrated with the surrounding urban fabric and would create a disconnect between the facility and the adjoining districts.
- Due to its inward focus, the temporary casino could be a greater threat to safety.

Harrah's

The Harrah's team has said they are not planning on constructing a temporary facility. However, they would construct a temporary facility if requested to do so by the city and/or state.

Isle of Capri

Isle of Capri is planning to a temporary casino operational within six months of receiving the license. They are planning to use a SprungTM (stressed membrane) structure located on the northeast corner of the upper Mellon Arena parking lot, operating within six months of receiving the license. It will contain 32,900 square feet of gambling space with 1,500 slot machines, two restaurants, and a video bar. An example of Sprung Structure Casino is included in Figure 5 on the following page. (This casino is in River Rock, California and has since become a permanent facility.⁴⁶)

⁴⁶ <http://www.sprung.com>

Figure 10. Sprung Structure Casino, River Rock, CA



Majestic Star

The Majestic Star team has proposed a temporary riverboat casino operational within eight months of licensing.

Figure 11. Riverboat Casino, Gary Indiana



Finding – Temporary Casino

Based on the assessment above, the net impact of a temporary facility, independent of the site on which it is placed, may be detrimental to the City of Pittsburgh. Although the gaming revenue stream and related jobs would come sooner to the City and state, such a facility may stall or displace the opening of a higher quality, permanent facility and may reduce the construction budget for the permanent facility.

Appendix C. Transportation and Parking Analysis

**Transportation and Parking Analysis
A Comparative Evaluation of Three Casino Gaming Sites in Pittsburgh**

Appendix C

Transportation and Parking Analysis

A Comparative Evaluation of Three Casino Gaming Sites in Pittsburgh

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I Introduction

The following is an analysis and comparative evaluation of existing and 2008 design year traffic, pedestrian, and parking conditions at each of the three remaining potential gaming sites in the City of Pittsburgh. The proposals are the Isle of Capri's Pittsburgh First Master Plan in the Lower Hill District and the Uptown area, the Harrah's Station Square Casino proposal at Station Square along the Monongahela River, and the Majestic City proposal located between the West End Bridge and Heinz Field, along the Ohio River.

Transportation and parking impact studies conducted by Trans Associates Engineering Consultants and the Isle of Capri, GAI Consultants and Harrah's, and the IBI Group and Majestic Star, were required to abide by a scope of work (Form-B) provided by the Department of City Planning. Form-B is a technical guidance document that specifies the study process, study area, study methodology, data collection, data analysis, study findings and recommended improvements, if any, to mitigate the impacts of the project. Each consultant was also provided with additional technical guidance that detailed the City's expectations with respect to the study work program.

The work program specified that each proposal use a 5,000-slot facility for analysis purposes, since the State Legislation permitting casino gaming in Pittsburgh and Philadelphia specified a maximum of 5,000 slot machines for each city:

Review of the traffic and parking impact reports for the Isle of Capri (IOC), Harrah's Station Square Casino (HSSC), and Majestic Star Casino (MSC) leads to the following generalizations about future casino gaming in Pittsburgh.

- ▣ Private automobiles will be the predominant mode of arrival at each of the casino sites.
- ▣ IOC, HSSQ, and MSC will rely, to some extent, on chartered buses, limousines, and taxis to arrive at the venues. HSSC and MSC have the added advantage of being located in close proximity to the river where they can use river taxis to access their sites.
- ▣ The share of patrons and employees using public transit to arrive at each of the casino sites will vary depending on the site location in relationship to dense population and employment centers. The HSSC site is situated to attract more patrons by transit and other non automotive modes because of their close physical proximity to the Port Authority's " T " transit station, numerous bus routes on Carson Street and on the " T ", the Duquesne Incline, and the Monongahela Incline.
- ▣ The IOC site also has great physical proximity to take advantage of numerous PAT bus routes on Centre Avenue, Fifth Avenue and Forbes Avenue; and the physical closeness of PAT'S Steele Plaza Station at Grant Street and Sixth Street.
- ▣ Public transportation service to the MSC site on the North Shore is inadequate. Only three transit routes currently serve this site. However, during Pittsburgh Steelers football games on Sundays, PAT provides additional buses to handle the game-day

demand. With the future construction of the North Shore Connector project, transit services between the Central business District and the North Shore will improve.

- ✓ IOC was the only applicant that conducted a comprehensive traffic and parking study of their master development plan as required by the City. IOC's study included a very expansive study area and a detailed data collection plan.
- ✓ Harrah's and Majestic completed a limited traffic study that did not meet the scope of work outlined and required in Form-B. In separate meetings with officials of both Harrah's and Majestic Star Casino, their representatives stated that it was not possible to complete a comprehensive analysis of their proposals due to the lack of time to meet the deadline established by the State's Gaming Control Board for submission of applications. We agreed, therefore, that if any of them were to become the winner of the lone license in Pittsburgh, a more comprehensive traffic analysis would be prepared.
- ✓ Pedestrian volumes to each casino will be low to moderate and will vary at all three casino sites. The Isle of Capri and Harrah's sites are well situated for a higher level of pedestrian access due to their proximity to many public transit facilities, existing pedestrian friendly amenities and the proximity of the central business district. IOC has a closer physical proximity to downtown and nearby attractions. In contrast, the regional highways that provide access to the Majestic Star site also create immense physical barriers for safe pedestrian travel to and from the site.

II Analysis

This report is a technical review of documents submitted by the three casino applicants in support of their proposals. The methodology for the review draws from publications by the Institute of Transportation Engineers, and work performed for the Philadelphia Gaming Advisory Task Force, published in a report to Mayor John F. Street titled: "Final Report, Philadelphia Gaming Advisory Task Force" dated October 27, 2005.

The seven (7) criteria listed below form the basis for the review and analysis of the consultant reports submitted to the department. They are designed to critically evaluate the advantages and disadvantages of each site.

A. Convenient Regional Highway Access

All three casino sites have excellent regional highway access, with varying degrees of proximity and difficulty. The highways that ring the Pittsburgh downtown also serve all the sites. They are I-579, I-279, I-376, State Routes 28, 65 and 51, Cross Town Expressway, Boulevard of the Allies, and Bigelow Boulevard.

1. ISLE OF CAPRI CASINO MASTER PLAN

The site is located on the eastern edge of the central business district in the Lower Hill District and the Uptown retail district. Phase 1 of the proposal is to construct a 3,000 slot machine casino (to be increased to 5,000 slot machines in Phase 2), a 4,301-space parking garage, and incidental entertainment and retail spaces.

Opportunities and Assets

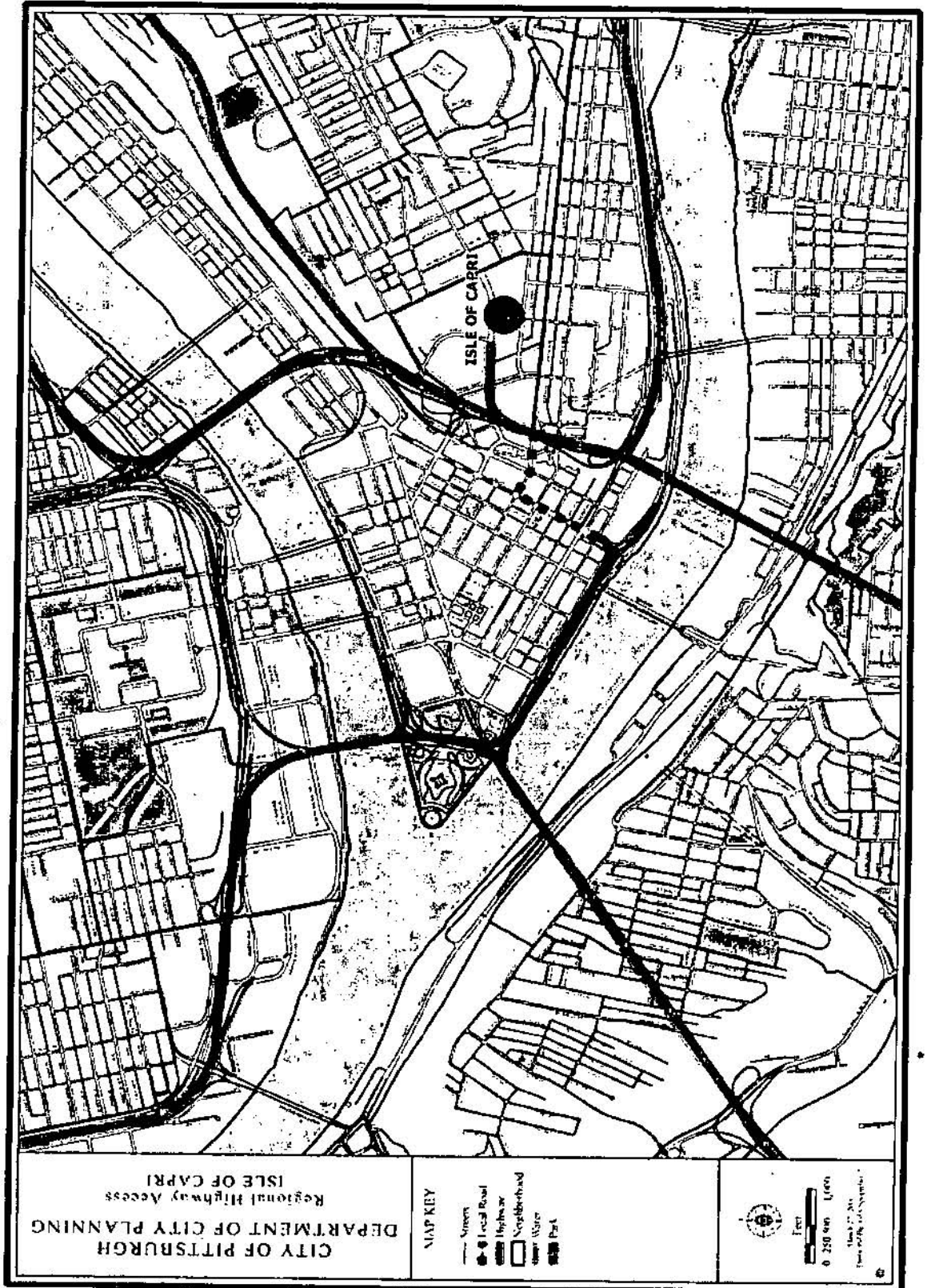
- ☑ The Cross Town Expressway (I-579) is the major transportation artery accessing the site. Extending from the Veterans Bridge to the Liberty Bridge, it provides connections to I-279 to the north, Route 28 to the Allegheny Valley, the Boulevard of the Allies and U.S. 19. Ramps provide direct connections to and from the site to the Cross Town Expressway.
- ☑ The Parkway East and West (I-276), I-279, Routes 65 and 51 provide indirect access to the site from the south and north.
- ☑ These regional highways and bridges provide excellent area wide vehicle access to the site directly and indirectly via local arterial and collector streets near the site.

Challenges and Liabilities

- ☑ Access to the site from the west is problematic but can be achieved via local arterials and collectors in downtown Pittsburgh; including Grant, Street, Ross Street, Boulevard of the Allies, and Sixth Street.
- ☑ Significant peak hour congestion is anticipated at the following nearby intersections:

- Washington Place at Bedford Avenue,
 - Cross Town Ramp at the Intersection of Washington Place and Centre Avenue,
 - Liberty Bridge ramps and bridge,
 - Cross Town Expressway between Bigelow Boulevard and the Liberty Bridge,
 - The intersection of Washington Place at Forbes Avenue and Chatham Square, and
 - The intersection of Washington Place at Fifth Avenue.
- 2 IOC has recommended signal modifications and roadway improvements; including timing and phasing changes to ameliorate the anticipated congestion.

Figure A1 Isle of Capri Regional Highway Access Map



2. HARRAH'S STATION SQUARE CASINO DEVELOPMENT

Phase 1 of Harrah's proposal includes construction of a 3,000 slot machine casino, with an additional 1,000 slot machines in Phase 2. Phase 1 also includes expansion of the existing Sheraton Hotel, construction of retail and operations spaces, and a 3,100 space new parking garage.

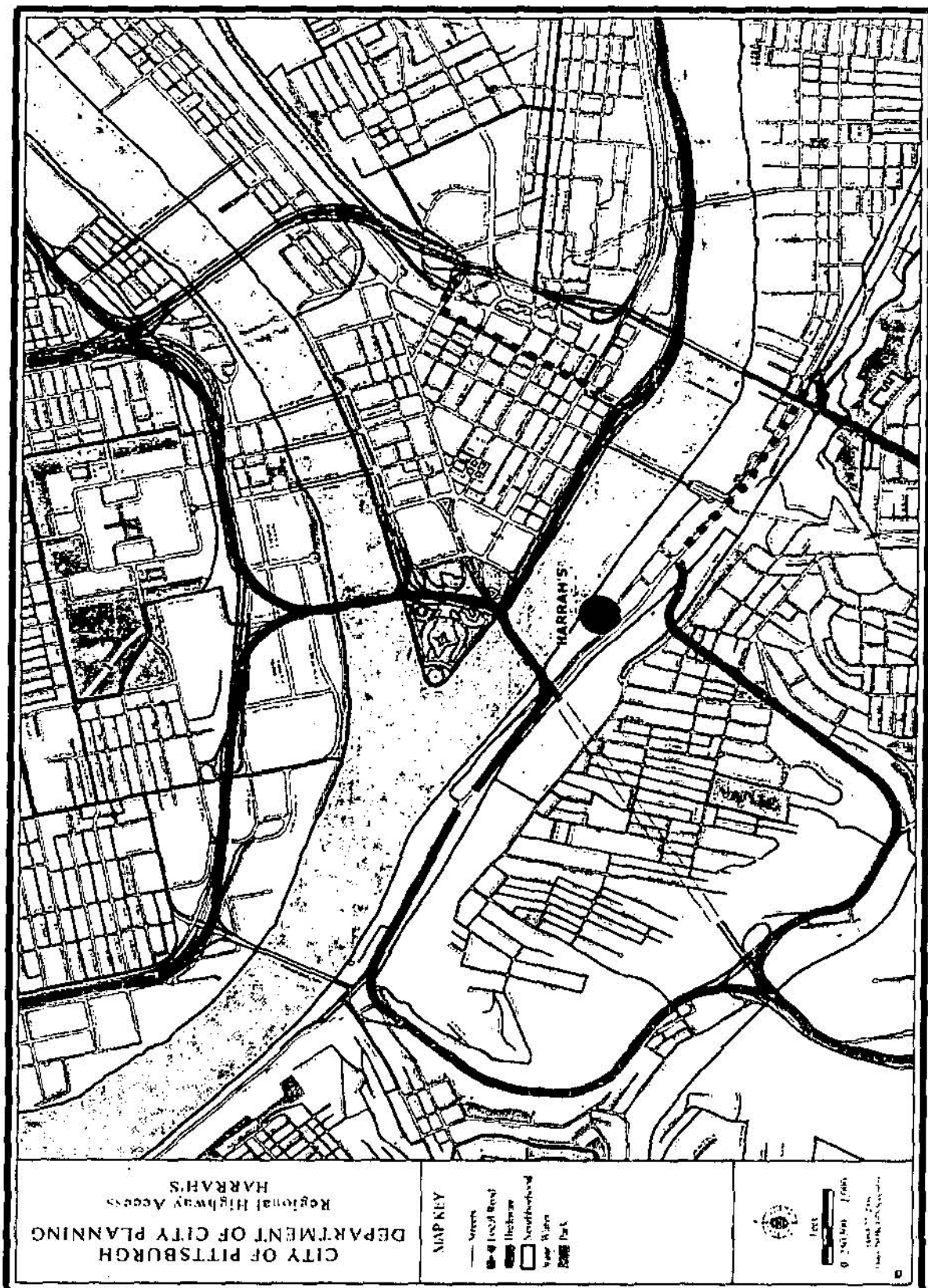
Opportunities and Assets

- ❑ The proposed Harrah's Station Square Casino is located in close proximity to I-279S with a ramp onto West Carson Street from the Fort Pitt Bridge, I-376E with an exit onto Grant Street and Fort Pitt Boulevard.
- ❑ Other highways include State Routes 65 and 51 through the West End Circle to Carson Street as well as Fort Pitt Boulevard to the Smithfield Street Bridge.

Challenges and Liabilities

- ❑ There is no direct regional highway access with similar reserve capacities as the IOC site serving the proposed casino. All traffic ultimately end up on Carson Street to access the site.
- ❑ Casino traffic on I-279 and I-376 must exit onto existing congested local arterials (Carson Street, Fort Pitt Ramp, and Smithfield Street Bridge) to access the site.
- ❑ During peak periods, traffic from State Routes 51 and 65 must also exit onto already congested West End Bridge, West End Circle, Smithfield Street Bridge and Carson Street to access the site.

Figure A2 Harrah's Regional Highway Access Map



3. THE MAJESTIC STAR CASINO

The Majestic Star Casino development includes construction of a 3,000 slot machine facility in phase one, with expansion to a 5,000 slots machine facility in Phase 2. The development also includes a 4,186 stall parking garage in phase one, with expansion up to a 5,100 parking stall structure in phase two. Plans also include several public and service areas, including entertainment and restaurant spaces.

Opportunities and Assets

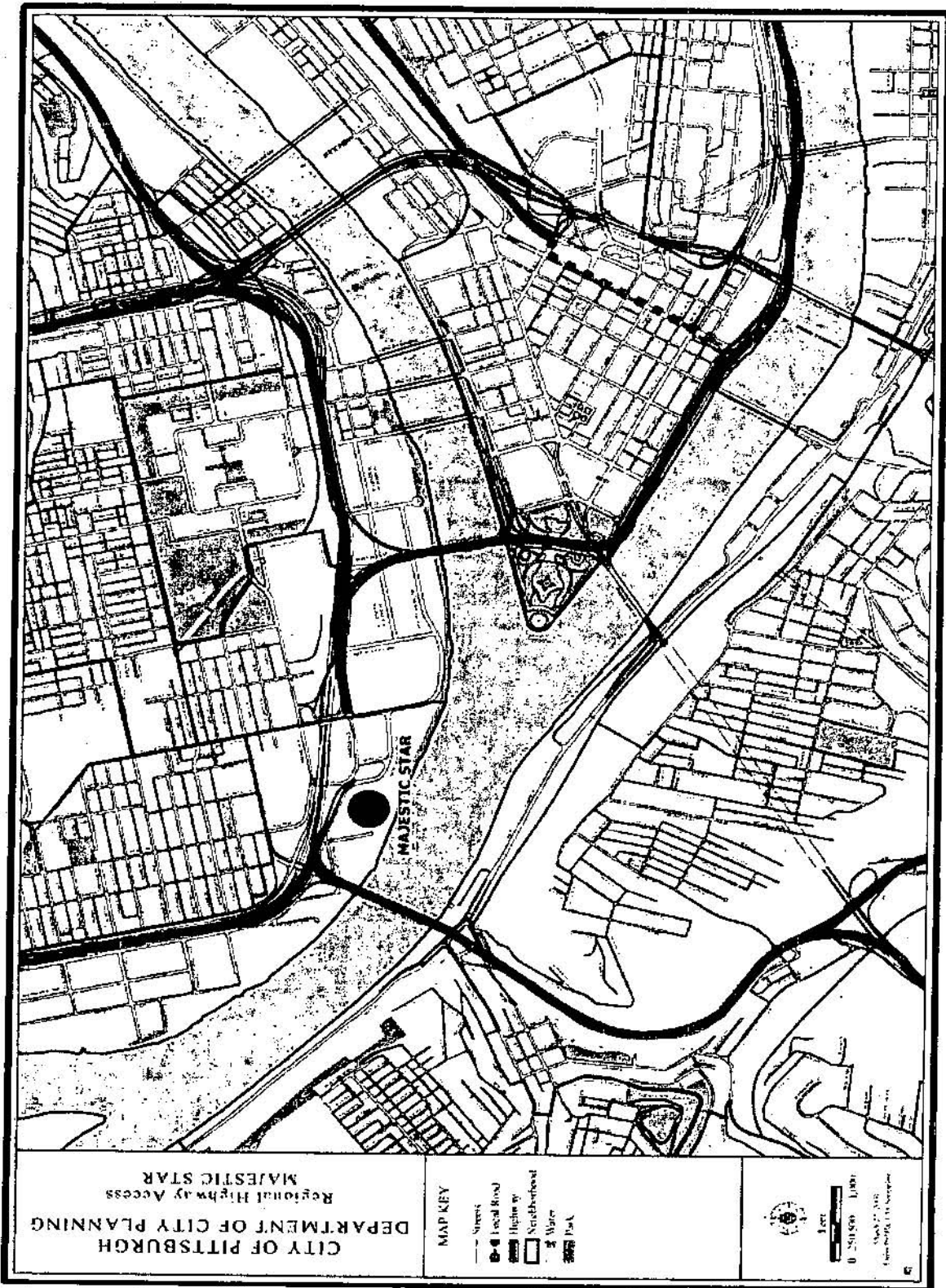
- ✓ The site is located in close proximity to I-279 North and I-279 South (including the HOV facility), State Route 28, State Route 65, the West End Bridge, and I-376 East and I-376 West via the Fort Duquesne Bridge.
- ✓ Inbound access to the site is provided by the West End Bridge, SR 65 and Reedsdale Street via North Shore Drive.
- ✓ The West End Bridge, SR-65 and Reedsdale Street connect directly to North Shore Drive.
- ✓ I-279, including the HOV facility, and I-376 connect directly to the site via the Fort Duquesne Bridge, Reedsdale Street and North Shore Drive.
- ✓ Outbound from the site, the West End Bridge and SR-65 are accessed via northbound Fontella Street or Allegheny Avenue, to westbound Ridge Avenue. The West End Bridge also provides access to Route 19, which links to I-279 South.
- ✓ I-279 South and Fort Duquesne Bridge are accessed via Allegheny Avenue to Ridge Avenue eastbound.
- ✓ I-279 North is accessed via a ramp on East General Robinson Street approximately a half mile east from the site. Access to the HOV lane from the site is provided via General Robinson Street eastbound.

Challenges and Liabilities

- ✓ Route 65 presents significant physical barriers to the site. The adjacent one-way street configuration on Reedsdale Street, Ridge Avenue, North Shore Drive between Reedsdale to Sproat Way, Sproat Way between North Shore drive and Reedsdale Street, and Fontella Street between Reedsdale Street and Northshore Drive limits the access choices to and from the site.
- ✓ Inbound traffic from SR-65 must merge across two lanes of traffic on North Shore Drive to access the site.
- ✓ Inbound traffic, from the West End Bridge, must merge across three lanes of southbound traffic on North Shore Drive to access the site.
- ✓ Inbound traffic, from westbound Reedsdale Street, must cross four lanes of traffic on North Shore Drive to enter the site access driveway.
- ✓ All of these various merge movements present significant physical and mental challenges to motorists and pedestrians alike and are unsafe.

-
- ☑ Due to the combination of safety and operational inadequacies, use of the existing street network without significant improvements to accommodate the casino traffic will be highly problematic.

Figure A3 Majestic Casino's Regional Access Highway Map



B. Convenient Local Access By Car

1. ISLE OF CAPRI

Opportunities and Assets

- ✎ The Cross Town Expressway divides the site into two sections with very different roadway configurations.
- ✎ East of the Expressway, the area surrounding the project consist primarily wide roads, including Centre Avenue, Washington Place, and Bedford Avenue.
- ✎ Centre Avenue provides three 12-foot lanes in each direction between Washington Place and Crawford Street and two lanes in each direction between Sixth Street and Washington Place. Parking is permitted in the curb lanes at varying locations.
- ✎ Bedford Avenue is classified as a minor arterial and provides an east-west connection along the northern edge of the site from Washington Place to the Hill District.
- ✎ Washington Place is classified as a collector and is three lanes in each direction from Bedford Avenue/Webster Avenue to Fifth Avenue. It provides connections to and from the site to the Veterans Bridge and Bigelow Boulevard.
- ✎ Mario Lemieux Place extends through the project site from Bedford Avenue to Centre Avenue. It is one lane in each direction with parking on both sides. It provides local access to the existing Mellon Arena.
- ✎ Forbes and Fifth Avenues are parallel streets, classified as principal arterials, and operate as one-way couplets between downtown and the Oakland neighborhood to the east. Forbes avenue operates one-way eastbound with two travel lanes and parking on both sides. Fifth Avenue operates one-way westbound with two travel lanes and parking on both sides.
- ✎ Pride Street, from Crawford Street to Fifth Avenue, is an extension of Crawford Street, and provides access the eastern edge of the site.
- ✎ Colwell Street is a two-way street between Washington Place and Pride Street within the project area. It operates as one lane in each direction with parking on both sides.
- ✎ Seventh Avenue provides an east/west connection between the project site and downtown Pittsburgh. It extends from Bedford Avenue across the Cross Town Expressway on split direction ramps, extending through downtown to Liberty Avenue.
- ✎ Grant Street provides the major north/south connection in downtown Pittsburgh. It extends from the I-376 ramps and Fort Pitt Boulevard at the south to Liberty Avenue and the entrance to the Martin Luther King East Bus Way at the north.

Challenges and Liabilities

- ✎ West of the Cross Town Expressway, the casino influence area consists of part of the central business district (CBD). Roads in the

CBD are generally narrow, with heavy pedestrian volumes, on-street parking and intersection congestion. The Department is of the opinion that these conditions will exacerbate in the future.

- ❑ Chatham Square operates as an extension of Washington Place. It connects Fifth Avenue to Forbes Avenue. It is, however, much narrower and congested during peak travel times. The Department is of the opinion that peak hour congestion on Chatham Square will become worse in the future when the casino is operating.
- ❑ Crawford Street, between Bedford and Centre, provides a north and south connection at the eastern edge of the site. It is one lane in each direction with parking on both sides and is classified as a minor arterial. Because of the residential character of this street, it should not be used as a primary or secondary access to the site.
- ❑ Fifth Avenue, adjacent to the site, operates as a two-lane street westbound into the downtown area. There is parking on both sides of the street with numerous PAT bus stops. Intense truck loading and unloading activities, combined with through traffic, parking and un-parking of cars, and high pedestrian volumes, dominate the street space.

2 HARRAH'S STATION SQUARE CASINO

Opportunities and Assets

- ❑ Carson Street (State Route 837) is the primary access route to the Harrah's casino site at Station Square.
- ❑ Near the project-area between the Fort Pitt Bridge and Arlington Avenue, Carson Street has two lanes in each direction and provides access to the site from the east towards the Southside neighborhoods as well as the west from the West End Circle, the West End Bridge, State Route 51 and State Route 65.
- ❑ A private two lane internal road runs from the Smithfield Street Bridge to the western parking lots. From there, it runs along Carson Street and connects to West Carson Street near the Duquesne Incline. This street provides access to the parking facilities and pedestrian access to the retail and entertainment establishments at Station Square.
- ❑ Another internal access road on the eastern part of Station Square provides access to the east parking lots and to Carson Street at its intersection with Arlington Avenue.

Challenges and Liabilities

- ❑ There is significant peak hour congestion on the Smithfield Street Bridge, the intersection of Smithfield Street and Carson Street, and the intersection of Arlington Street and Carson Street. DCP projects that Harrah's Phase one proposal will worsen traffic conditions at these locations.
- ❑ DCP additionally projects that events at the casino, the North Shore Stadiums, and Phase 2 development will further increase intersection delays and reduce levels of service.

- ❑ DCP disagrees with Harrah's assertion that because Station Square is an established entertainment center for the Pittsburgh metropolitan area, many of the trips generated by the casino will be drawn from existing Station Square patrons and will not be new trips. Harrah's fails to provide documentation to support this thesis.
- ❑ The Smithfield Street Bridge and Smithfield Street separate the eastern half of the site from the western half.
- ❑ The recommended improvements by Harrah's, to widen the Smithfield Street and Carson Street approaches by a lane on each approach, and construct a pedestrian bridge over the western end of Carson Street, does not appear to satisfactorily solve this problem.
- ❑ Harrah's estimates that six percent of casino patrons and other development traffic will arrive and depart the site via East Carson Street. This street is one lane in each direction with center turning lanes at some intersections, between Arlington Avenue and Hot Metal Street, with parking on one or both sides (throughout its length) to the South Side Works. The Department believes that with the proposed casino development, peak hour failures will increase at critical intersections along this stretch of Carson Street resulting in increased peak period delays in the corridor. The traffic study did not include this area in its analysis.

3 MAJESTIC STAR CASINO

Opportunities and Assets

- ❑ North Shore Drive is a wide four-lane road that provides an opportunity to access the porte-cochere entrance of the proposed casino.
- ❑ MSC proposes to install a traffic signal at the porte-cochere entrance and North Shore Drive. This can serve as an alternative access for traffic arriving from the east along North Shore Drive and from the Stadium area.
- ❑ MSC has also proposed improvements to North Shore Drive and Reedsdale Street, including changes in signal phasing and timing. These changes will separate movements from Reedsdale Street, SR-65, and West End Bridge to allow lane changes to occur safely.
- ❑ MSC will further investigate the potential of constructing a ramp directly to the second level of the proposed garage from the West End Bridge ramp to Reedsdale Street. MSC opines that this will have the added advantage of reducing congestion at the North Shore casino access driveway.

Challenges and Liabilities

- ❑ Local street access to the Majestic Star Casino would be provided by North Shore Drive and Reedsdale Street. Reedsdale Street is a two lane street and operates one-way eastbound to North Shore Drive and one-way eastbound from the West End Bridge Ramp to North Shore Drive.

- ❑ Reedsdale Street (westbound) connects to North Shore Drive via a single stop-controlled left turn lane.
- ❑ Without modifications to the intersection of Reedsdale and North Shore Drive, drivers heading to the casino must cross four lanes of southbound traffic on North Shore Drive to access the site.
- ❑ Allegheny Avenue provides direct connections to Reedsdale Street and North Shore Drive, but with no direct access to the site. All access from the east must use Reedsdale Street to get to the site.
- ❑ Ramps from the West End Bridge and SR 65 to North Shore Drive feed into the intersection of Reedsdale Street and North Shore Drive, creating the potential for significant congestion in the future.
- ❑ Inbound drivers from the West End Bridge and SR 65 must merge across two to three lanes of traffic to access the site.
- ❑ Beaver Avenue and Reedsdale Street provide the only access to the west side of the site. They are both one-way streets southbound and eastbound respectively. Access from these streets to the site is hindered by the river and SR 65. Under current physical conditions inbound access to the west side of the site difficult.
- ❑ Under existing physical conditions, direct egress from the site to the west is not possible. All vehicles exiting the site must travel eastbound on Reedsdale Street to North Shore Drive.
- ❑ Game day at Heinz Field presents another set of problems. Game day traffic causes significant traffic congestion on existing local streets; including North Shore Drive, Reedsdale Street, General Robinson Street, Ridge Street, and Western Avenue.
- ❑ The Department believes that the ability of the existing road network to provide safe access to the casino and accommodate game day traffic is improbable.

C The Site Must Be Accessible By Public Transit

1. ISLE OF CAPRI

Opportunities and Assets

- ❑ The proposed Isle of Capri site is well served by public transportation provided by the Port Authority Transit (PAT)
- ❑ Directly serving the site on Centre Avenue, between the central business district and neighborhoods in the east end of the city, are three routes (the 81A, 81B, and 81C).
- ❑ Extensive transit service is also available on Forbes Avenue and Fifth Avenue. PAT bus routes 61A, 61B, 61C, 71A, 71C, 71D serve both Forbes and Fifth Avenues.
- ❑ These routes have a combined headway of approximately 2 minutes during peak periods and are directly within walking distance of the proposed site.
- ❑ The site is also within short walking distance of the Steel Plaza Station of the Port Authority's Light Rail Transit System (T). A station

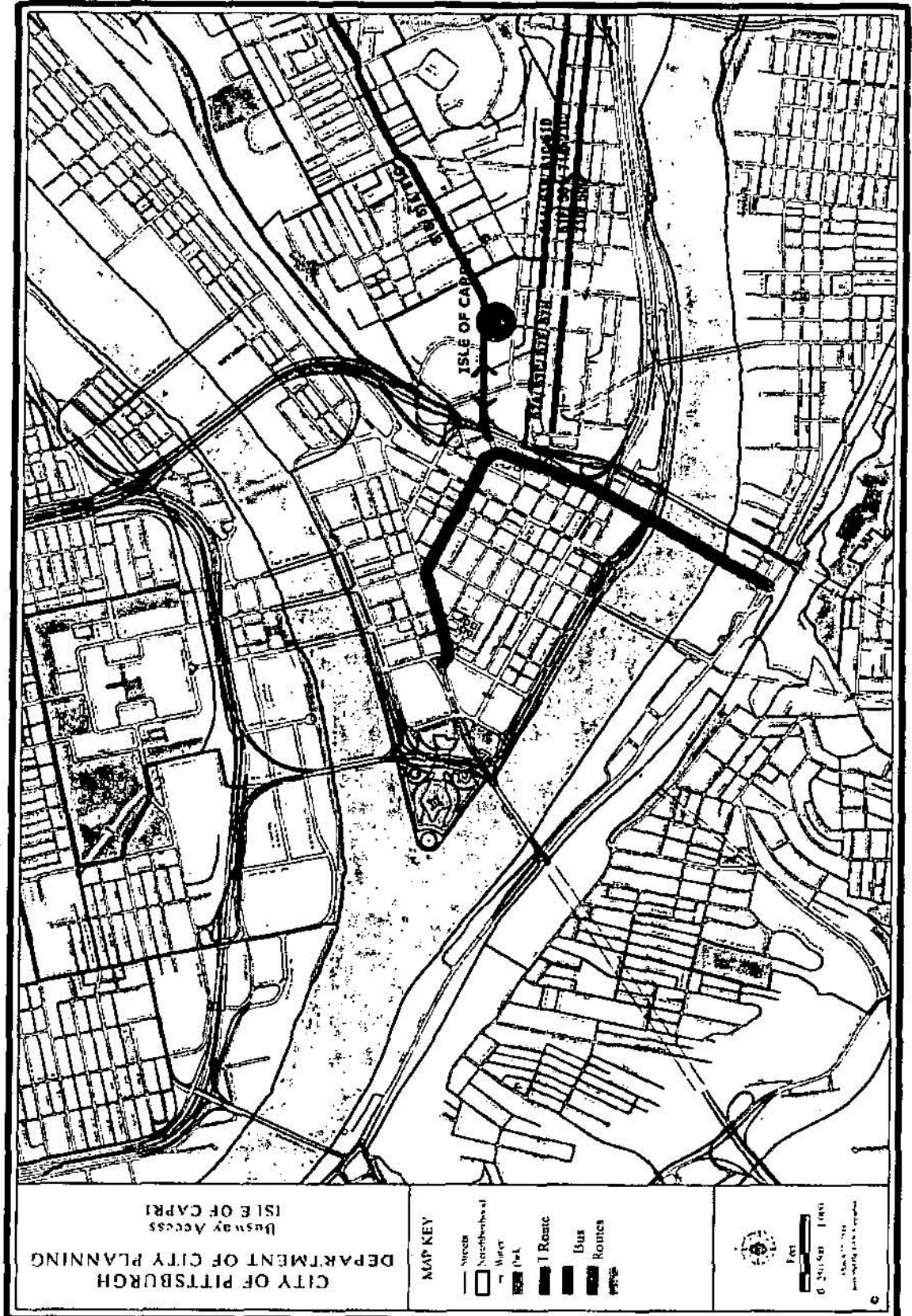
entrance is located at Sixth Street/Ross Street intersection and another at Grant Street in the Mellon Bank Building.

- ✓ The "T" provides vital public transit service to downtown from local neighborhoods in the city and southern suburbs. PAT has plans to extend this service to the North Shore near Heinz Field and PNC Park via an underwater tunnel.
- ✓ The IOC site is within a short walking distance from downtown Pittsburgh and the Fifth Avenue retail district.
- ✓ The traffic impact analysis has determined that 12 percent of casino patrons and employees will arrive at the site via public transportation.

Challenges and Liabilities

- ✓ Too many bus routes on Fifth Avenue contribute to peak hour congestion and unsafe conditions for pedestrians. There are significant conflicts between buses, trucks, cars and pedestrians.
- ✓ The proposed casino truck access on Fifth Avenue will add to this congestions and vehicular/pedestrian conflicts, increasing the probability of accidents.
- ✓ No buses currently provide service to the site between the southern edge on Forbes/Fifth Avenues and the northern edge on Bedford Avenue.

Figure C1 Isle of Capri Public Transit Map



2. HARRAH'S STATION SQUARE CASINO

The Harrah's site at Station Square presents the greatest public transportation options for casino patrons and employees to access the site. Station Square is the most accessible site by public transportation by virtue of its close proximity to several bus routes, the Light Rail Transit Service and nearby "T" Station, the Monongahela and Duquesne Inclines, and the Monongahela River itself.

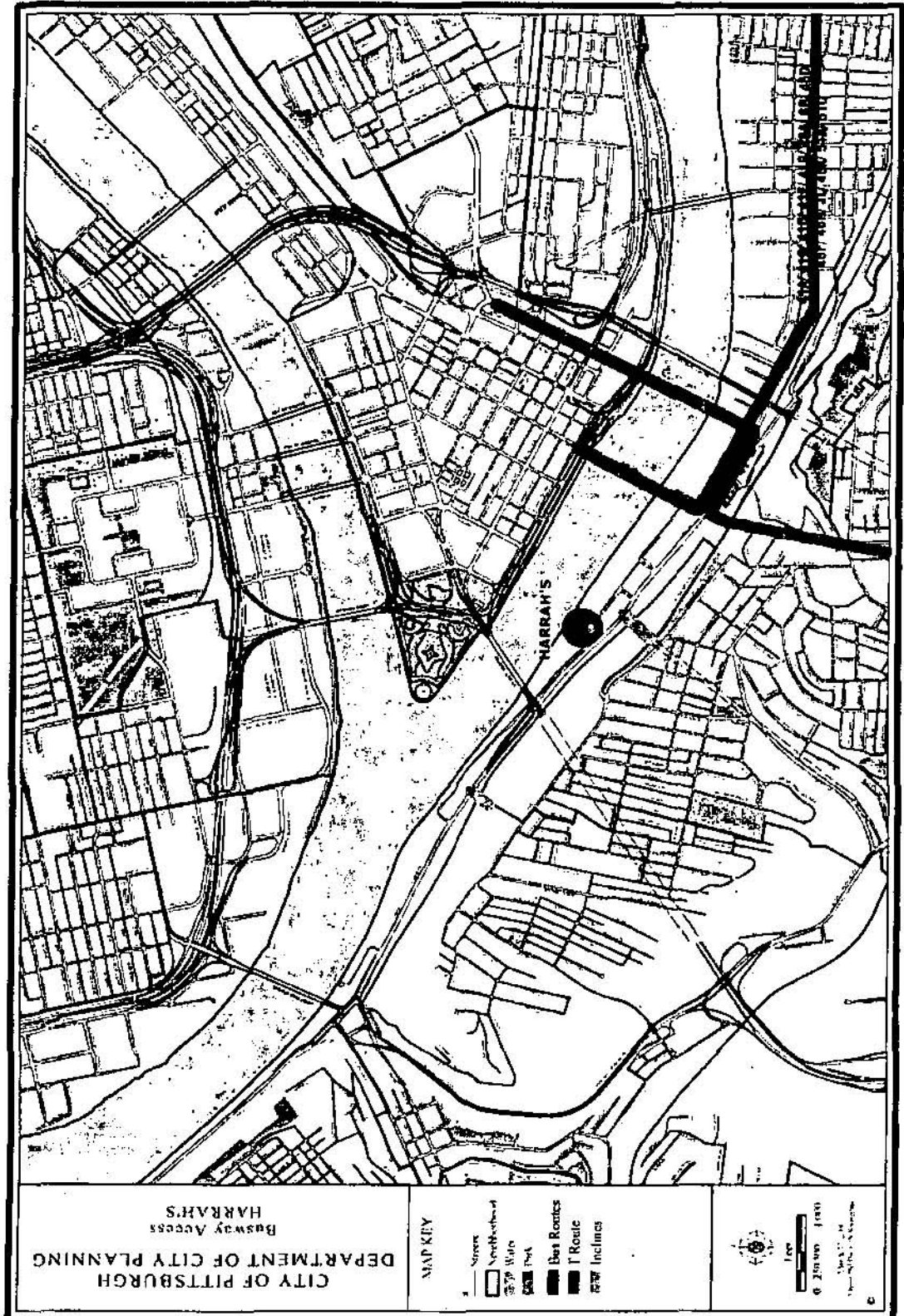
Opportunities and Assets

- ❑ Three public service modes serve this site: The public railroads, Fort Pitt and Fort Duquesne Inclines, PAT buses, and the Light Rail Transit.
- ❑ PAT bus service in the area consists of fourteen bus routes that serve neighborhoods and suburbs in the southern part of the City and County. They include the 41-A Pioneer Avenue, 41-B Bower Hill, 41-D Brookline, 41-E Mount Washington, 41-G Dormont, 46-A Brentwood, BR-Brentwood Flier, 46-D Curry, 46-F Baldwin Highlands, 46-H Pleasant Hills, JL-Jefferson-Large, 46-K Beltzhoover-Knoxville, 51-A Arlington Heights, and 51-C Carrick.
- ❑ The "T" Routes include the 42-S South Hills Village via Beechview, the 47-L Library, and the 42-S South Hills Village. These routes connect downtown to Station Square to suburban communities in the south of Pittsburgh.
- ❑ According to Harrah's, Station Square currently has three water transportation components. They include the Gateway Clipper Fleet, public docking facilities, and water taxi service.
- ❑ All of the above services will be of immense help and an asset to the proposed gaming facility.
- ❑ There is also a complimentary shuttle bus service provided by the Sheraton Hotel. Harrah's believes that this service may expand in the future.

Challenges and Liabilities

- ❑ The Smithfield Street Bridge operates as two lanes southbound and one lane northbound. During the peak hours, there is significant queuing of busses on the bridge and at the intersections at the northern and southern termini of the bridge.
- ❑ Buses also form long cues on Carson Street adjacent to the "T" Station; and this the potential for pedestrian/bus and bus/vehicular conflicts.
- ❑ The Department questions the utility of a river taxi service beyond providing connections to the stadiums on the North Shore.

Figure C2 Harrah's Public Transit Map



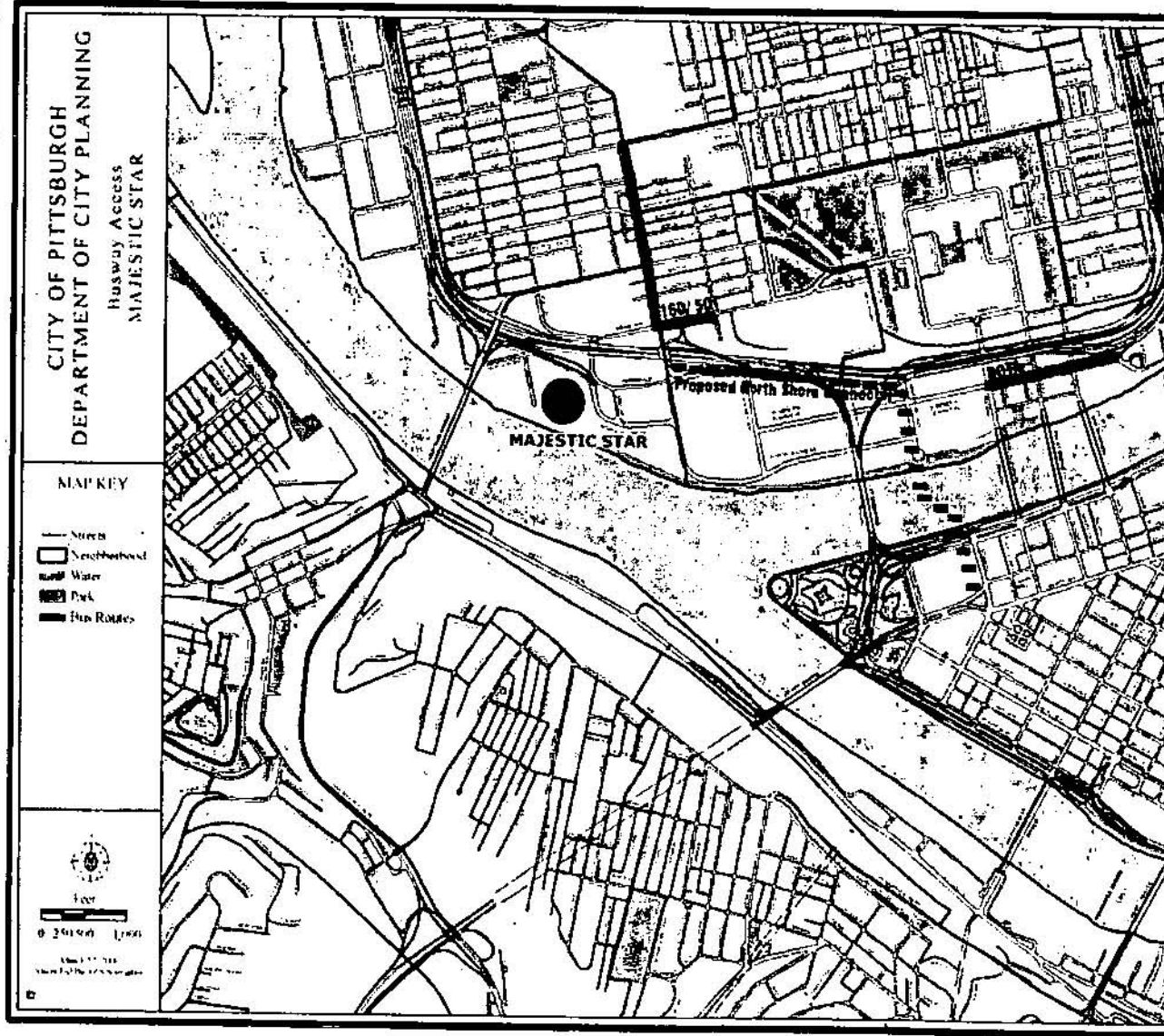
3. THE MAJESTIC STAR CASINO

Opportunities and Assets

- ✔ Current transit services include three routes provided by the Port Authority and one route operated by the Beaver County Transit Authority (BCTA).
- ✔ Only one PAT route (the Route 16A Ohio River Boulevard) provides direct service to the site.
- ✔ On Steelers home games at Heinz Field, however, PAT provides additional special buses to accommodate the game-day demand.
- ✔ The site will have good transit service in the future with the planned construction of the North Shore Connector project. The project will have a station at the intersection of Reedsdale Street and Allegheny Avenue. However, the station will be approximately 1,200 feet from the primary casino access.
- ✔ The river frontage will provide opportunities to provide a mooring area for a water taxi facility, ferry services and personal boat docking facilities.

Challenges and Liabilities

- ✔ Under existing conditions, public transit service to the Majestic Star Casino is poor and inadequate. In fact, it is the least served by public transit.
- ✔ Two out of the three PAT routes that provide service to the area (the 16D Manchester and 501 Manchester-Wilkinsburg) provide access to Allegheny Avenue only. This bus stop location is several hundred feet away from the proposed entrance to the casino.
- ✔ The BCTA route provides service from Chippewa to downtown Pittsburgh and travel from SR 65 to General Robinson Street.
- ✔ The Department questions the utility of a river taxi service beyond providing connections to Station Square.



D The Site Must Be Accessible To Pedestrians

1. ISLE OF CAPRI CASINO

Opportunities and Assets

- ∆ The Isle of Capri Casino is the most suitably located site for safe pedestrian access and circulation.
- ∆ The percentage of pedestrian trips to the proposed casino is estimated at 2 percent of the total trips on any given weekday or weekend. This is within normal averages for pedestrians for this location.
- ∆ The majority of pedestrians walking to the site on a weekday will be downtown employees. The weekends will comprise downtown employees and residents; including residents of the nearby Hill District and Uptown areas.
- ∆ IOC has recommended pedestrian improvements at critical intersections near the site; including new pedestrian signal heads and more green time for pedestrians to cross the street.

Challenges and Liabilities

- ∆ The front entrance of the IOC casino will be on Centre Avenue. A walk from the central business district to this location may prove challenging for some people because of the up hill terrain.
- ∆ Access the site from Fifth and Forbes Avenues presents another set of challenges due to the peak hour pedestrian/vehicle conflicts on Fifth and at the Fifth Avenue and Washington/Chatham Square intersection.
- ∆ The intersection of Bedford Avenue and Washington Place is not a hospitable environment for pedestrians to cross safely. This condition will exacerbate in the future when casino traffic is added to the intersection.
- ∆ Pedestrian travel along the north curb face of Fifth Avenue will become less safe and problematic due to the increased number of truck traffic accessing the site from Fifth Avenue.

2. HARRAH'S CASINO AT STATION SQUARE

Opportunities and Assets

- ∆ HCSS is the second most suitably located site for safe pedestrian access and circulation.
- ∆ Harrah's has assumed that pedestrians coming to their casino would typically come from the downtown, Southside, Mt. Washington and Duquesne Heights, and patrons to and from Pittsburgh Steelers football games.

- ❑ Harrah's estimates that 5 percent of their patrons and 15 percent of their employees will walk, take the Inclines, or ride a bicycle to access the site. This estimate is slightly higher than IOC.
- ❑ Harrah's estimates that the proposed casino will generate approximately 24,000 patrons on a weekday and 40,000 on a Saturday. Five percent or 1,200 to 2,000 will walk to the casino.
- ❑ Harrah's estimates that 1,200 to 2,200 employees will work at the casino on a daily basis (albeit in staggered shifts). Fifteen percent or approximately 180 to 330 will walk to the site daily.

Challenges and Liabilities

- ❑ The site is a fifteen to twenty minute walk from the center of downtown Pittsburgh. This can be a daunting task for anyone on a brisk winter day or evening.
- ❑ The Southside is at least a mile away from the site. This makes walking to the site improbable.
- ❑ Harrah's estimate of pedestrians walking to the site is higher than normal. The site is isolated; with the mountain on the south and the river on the north forming distinct physical barriers to pedestrian access.
- ❑ The only pedestrian access from downtown Pittsburgh is a sidewalk on the Smithfield Street Bridge and sidewalks along Carson Street. There is, however, no sidewalk on northern side of Carson Street fronting Station Square, between the Smithfield Street Bridge and the Fort Pitt Bridge.

3. MAJESTIC STAR CASINO

Opportunities and Assets

- ❑ The Three Rivers Heritage Trail currently provides pedestrian and bicycle travel along the north shore of the Allegheny and Ohio Rivers from the Carnegie Science Center to the west past the stadium area to the east.
- ❑ The Majestic proposal plans to extend the trail system through the site with considerable pedestrian improvements through their site that will provide full physical and visual access to the riverfront.
- ❑ The Riverlife Task Force is planning to improve a pedestrian connection across the West End Bridge to improve accessibility through the Three Rivers Park.

Challenges and Liabilities

- ❑ The Majestic site is the least suitably situated site for safe pedestrian access, hemmed in by the Ohio River to the south, the I-279 highway to the north, North Shore Drive to east, and Beaver Avenue and PA 65 to the west.
- ❑ Together, they present huge physical barriers to direct and safe pedestrian access to the site from all directions.

E. There Must Be Adequate Parking On or Adjacent to the Site

Each of the consultants for the casino developers has conducted a parking demand and supply analysis of the casino portion of their development under existing and design year conditions. All profess to provide ample parking for their patrons and employees in garages on the site, adjacent to the site, or in remote locations.

1. ISLE OF CAPRI

Opportunities and Assets

- ∇ Based on information provided, the Isle of Capri intends on meeting all of their parking needs for casino patrons on the site and nearby parking facilities.
- ∇ IOC will provide employee parking at off site locations, with a shuttle bus service between the parking areas and the casino.
- ∇ Parking demand and supply comparisons were carried out for a weekday daytime, weekday evening time with maximum arena event, Friday evening with maximum arena event, and Saturday evening with maximum arena event (See appendix).
- ∇ Based on operational data provided by IOC on their other facilities, IOC has estimated that the 5,000 slot machine casino will require a 4,301-parking garage.
- ∇ IOC has identified 9,837 alternate parking spaces in facilities within a fifteen-minute walk of their site for use by both patrons and employees (See appendix).

Challenges and Liabilities

- ∇ The estimated 4,301 parking supply for the 5,000 slot machine casino is slightly lower than the 1.0 to 1.5 spaces per gaming position recommended by the casino industry. This means that a parking garage with 5,000 to 7,500 spaces may be required for the IOC garage. The opposite argument of this is that as the garage becomes bigger with more parking spaces, streets and intersections serving the casino become more congested.
- ∇ Although IOC has identified ample parking in and around the CBD for use by parkers displaced by the casino, there is no certainty that they will use these spaces en mass.
- ∇ There is a possibility that some of these parkers may infiltrate the Crawford Square and Hill District neighborhoods looking for parking spaces on the street during peak casino hours on Friday and Saturday, or during arena events.

Table E1 (a) IOC On-Site Parking Supply/Demand Comparison

PARKING PEAK PERIOD	TOTAL PARKING SUPPLY ⁽¹⁾	PARKING DEMAND ⁽²⁾		PARKING SURPLUS OR (DEFICIT) ⁽³⁾
		PATRONS	EMPLOYEES	
ON-SITE PARKERS				
Friday Evening with Maximum Arena Event	4,301	3,897	100 ⁽⁴⁾	304
Saturday Evening with Maximum Arena Event	4,301	3,789	100 ⁽⁴⁾	412

2. HARRAH'S STATION SQUARE CASINO

Opportunities and Assets

- ✓ HSSC and Forrest City Enterprises own and control the entire site. This provides them with an opportunity to provide all required parking on site for both patrons and employees.
- ✗ If Harrah's can not provide this parking on the site, alternate parking and shuttle bus arrangements for employee parkers should be explored.

Challenges and Liabilities

- ✓ Harrah's has estimated parking demand for the casino based on current usage of existing parking facilities on peak design days at Station Square; excluding events at the Amphitheater.
- ✗ Peak parking for the casino is expected to be Saturday evenings. This is also currently the highest peak parking period for entertainment events at Station Square.
- ✗ To accommodate the Saturday peak demand, the analysis recommends a parking supply of approximately 3,100 for both patrons and employees. However, this does not appear to be sufficient to meet the demand.
- ✗ The parking demand for the casino on a Saturday evening is approximately 3,100 spaces; 2,700 spaces for patrons and 400 spaces for employees or a parking rate of .78 spaces per slot machine or per gaming position. This is below industry standards based data shown through independent research. Industry standards show a parking rate of 1.0 to 1.5 parking spaces per gaming position.
- ✓ This means that a parking garage with 5,000 to 7,500 spaces may be required for the HSSC garage. The opposite argument of this is that as the garage becomes bigger with more parking spaces, Smithfield

Street, Carson Street, and Station Square driveways serving the site will become more congested.

Table E2 Harrah's Parking Table

The development plans show that Station Square will have approximately 5500 parking spaces, provided in four parking areas.

East Parking Lots	1185 parking spaces
Central Garage	1210 parking spaces
Under Casino	600 parking spaces
New Garage	2500 parking spaces
TOTAL	5495 parking spaces

3. THE MAJESTIC STAR CASINO

Opportunities and Assets

- ✓ The parking demand for the Majestic is estimated to be 4,186 spaces for the phase one development (which includes the 3,000-slot casino with some specialty restaurants).
- ✓ Phase two of the development will include an additional 2,000 slot machines and it would require additional parking spaces.
- ✓ The total parking demand for the full 5,000 slot machine casino is approximately 5,100 spaces.
- ✓ MSC is taking advantage of an opportunity to park most of the casino employees in remote parking areas and use shuttle buses to transport them to and from the site.
- ✓ The parking demand estimate by Majestic is in line with industry standards and provides the patron parking demand on the site.
- ✓ MSC's proposed parking garage will meet the Department's parking requirements as shown in the table below.

Challenges and Liabilities

- ✓ Employee parking for 600 spaces will, however, be provided at an off-site location yet to be identified. These employees will be transported to and from the casino by chartered shuttle buses. This parking should not be located in or near residential areas on the North Side.
- ✓ Design of the parking garage and site access points is incomplete.

Table E2 (a) MSC Parking Demand/Supply Comparison

Parking Type	Supply	Peak Demand
Patrons	4,186*	4,000
Employees	600*	600

*on-site parking initially at 4,186 but expandable to meet demand

*off-site parking provided to meet demand

F. There Must Be Adequate Space For Bus, Taxi, And Other Common Carrier Transportation (Including Loading And Unloading).

1. ISLE OF CAPRI

Opportunities and Assets

- ✓ The preliminary site plan for the casino shows a 700-foot loading dock area. This will provide enough dock space to stage all trucks internally instead of on the public street.
- ✓ The loading dock area will include two separate loading areas. The first will serve the casino and have twelve loading docks. The second loading area will serve the new arena. The design of the loading docks will accommodate a maximum WB-40, WB50 and WB67 trucks.
- ✓ The loading dock is large enough that trucks can circulate and turn around within the facility.
- ✓ The casino will be designed to have a porte-cochere with entrance and exit on Centre Avenue.
- ✓ Tour or charter buses will access the site via Fifth Avenue and public bus service via Centre Avenue and Fifth Avenue.
- ✓ The porte-cochere entrance will be located on Centre Avenue and will serve taxis, limousines, and drop offs.

Challenges and Liabilities

- ✓ A preliminary truck loading management plan will have to be finalized by IOC.
- ✓ Truck and charter bus access via Fifth Avenue could exacerbate congestion. Conflicts will increase between PAT buses, trucks loading and unloading activities, casino trucks and charter buses, and pedestrians on Fifth Avenue.

2. HARRAH'S STATION SQUARE CASINO

Opportunities and Assets

- ✓ The Harrah's site plan shows porte-cochere operations at the casino on Carson Street side.
- ✓ All truck operations are presumed to take place on the site.

Challenges and Liabilities

- ✓ No information is provided on truck arrivals, circulation and docking operations at the casino.
- ✓ No truck loading management plan is provided.
- ✓ Insufficient information is provided to evaluate porte-cochere operations.

3. MAJESTIC STAR CASINO

Opportunities and Assets

- ✓ Majestic will provide separate loading areas for the casino and restaurant uses on the site.
- ✓ Trucks will access the loading area via Reedsdale Street.
- ✓ The proposed site plan shows casino truck loading docks for two semi-trailer trucks and three large single unit trucks.

Challenges and Liabilities

- ✓ No analysis is shown in the report to document how the number of dock space was determined.
- ✓ MSC claims that the proposed truck loading area will accommodate the truck loading demands of the casino and food court, buffet, and entertainment areas. The report fails to show any analysis documenting how the number of dock spaces was determined.
- ✓ No truck loading management plan is submitted in the report. Majestic promises to prepare one if awarded the gaming license.

G. The Casino Development Must Minimize the Potential For Traffic Congestion

The following is a detailed assessment of each of the development proposals and their impact on existing and design year traffic conditions on the City's transportation infrastructure and nearby residential neighborhoods. This assessment is based on an overview of the three potential sites and analysis of the transportation impact study submitted by each applicant to support their development proposal. Each traffic consultant collected field data that was analyzed to represent a broad assessment of Level of Service (LOS) and capacity conditions at critical intersections and roadway links accessing the site. The field data were also used to analyze future design year traffic conditions with and without the casino development using a 0.5 percent traffic growth factor supplied by the Southwestern Pennsylvania Commission.

1. Level of Service

Each roadway link or intersection was evaluated using procedures established by the Transportation Research Board (TRB) contained in the Highway Capacity Manual, HCM 2000. The Level of Service of a roadway link or intersection is a qualitative and quantitative evaluation of the traffic operation of a given intersection using these procedures. They range from LOS A (a condition of little or no delay) to LOS F (a condition of capacity breakdown represented by heavy delay and congestion). Level of Service B is characterized as stable flow. Level of Service C is also characterized by stable flow but there is some congestion with declining levels of comfort and convenience. Level of Service D is characterized by unstable flow with severe restrictions on speed and

maneuverability. Level of Service E represents unstable flow with the intersection, at or near capacity, and characterized by poor levels of comfort and convenience. The table below demonstrates the levels of service models described above.

Table G1 Level of Service Criteria

SIGNALIZED INTERSECTION	
Level of Service	Stopped Delay per Vehicle (Sec)
A	Less than 10 sec
B	Greater than 10 sec and less than 20 sec
C	Greater that 20 sec and less than 35 sec
D	Greater than 35 sec and less than 55 sec
E	Greater than 55 sec and less than 80 sec
F	Greater than 80 sec

SIGNALIZED INTERSECTION	
Level of Service	Stopped Delay per Vehicle (Sec)
A	Less than 10 sec
B	Greater than 10 sec and less than 15 sec
C	Greater than 15 sec and less than 25 sec
D	Greater than 25 sec and less than 35 sec
E	Greater than 35 sec and less than 50 sec
F	Greater than 50 sec

2. CASINO TRIP DISTRIBUTIONS

Understanding existing trip making characteristics into and out of the Pittsburgh downtown is a critical first step in assessing the potential traffic impacts associated with the proposed casino development. The Southwestern Pennsylvania Commission was asked to provide technical guidance in estimating existing trip distributions to downtown Pittsburgh from potential market areas, in the Pittsburgh region, including Allegheny County, Armstrong County, Beaver County, Butler County, Washington County, Westmorland County, and external counties in Ohio and West Virginia. Table G2 below further explains this distribution.

Table G2 Trip Distribution Matrix

TRIP DISTRIBUTION MATRIX		
ORIGIN	TOTAL BASE TRIPS	Average %
ZONE	PITTSBURGH	DISTRIBUTION
Allegheny	20,413	89.73
Armstrong	135	0.59
Beaver	309	1.36
Butler	415	1.82
Washington	510	2.24
Westmorland	673	2.96
External Counties	295	1.30
TOTAL	22,750	100.00

All of the transportation consultants for casino developers were required to apply the above table to distribute casino trips to the regional highway system.

3. ISLE OF CAPRI SITE

This site is located in the Lower Hill District and Uptown Area with frontages on Centre Avenue, Washington Place and Fifth Avenue (See Figure G3). The phase one casino site is 9.2 acres. IOC has complete property control.

a. **Data Collection**

Opportunities and Assets

- ✓ A data collection plan was put together by the IOC transportation consultant that included a field reconnaissance of the IOC study area to observe existing signal operations and intersection operations.
- ✓ Intersection turning movement counts were conducted at key intersections in the study area. The counts were conducted in the AM peak period, the PM peak period, the Arena peak period, and the Saturday casino peak period
- ✓ 48-hour Automatic Traffic Recorder Counts (ATC) was conducted critical street segments in the study area.
- ✓ Pedestrian counts were also collected at critical intersections in the study area.
- ✓ Table G3.1 below show the results of traffic counts on major and minor arterials serving the IOC site.

Challenges and Liabilities

- ✓ Isle of Capri implemented a comprehensive data collection plan in the study area. There are no challenges or liabilities with respect to this plan. The number of vehicle trips on roadways in the IOC study area is shown in Table G3 (a).

Table G3 (a) Roadway Average Daily Traffic (ADT) Volumes

LOCATION	DIRECTION	NUMBER OF TRIPS					
		2008 BASE CONDITIONS ¹		MASTER PLAN TRIPS ²		2008 COMBINED CONDITIONS	
		FRIDAY	SATURDAY	FRIDAY	SATURDAY	FRIDAY	SATURDAY
Washington Place (From Centre Avenue to Bedford Avenue)	Northbound	12,545	10,443	6,820	6,645	19,365	17,288
Washington Place (From Centre Avenue to Bedford Avenue)	Southbound	4,579	3,628	482	483	5,061	4,111
Bedford Avenue (From Chatham to Washington Place)	Eastbound	14,720	10,391	Neg.	Neg.	14,720	10,391
Seventh Avenue Ramp (From Bigelow Blvd. to Washington Place)	Eastbound	6,169	4,691	482	483	6,651	5,174
Centre Avenue (From Washington Place to Mario Lemieux Place)	Eastbound	6,277	5,218	20,249	20,303	26,528	25,521
Centre Avenue (From Washington Place to Mario Lemieux Place)	Westbound	5,894	4,903	12,516	12,562	18,410	17,465
Crawford Street (From Centre Avenue to Wylie Avenue)	Northbound	1,986	1,405	Neg.	Neg.	1,986	1,405
Crawford Street (From Centre Avenue to Wylie Avenue)	Southbound	2,267	1,697	Neg.	Neg.	2,267	1,697
Veterans Bridge Ramp (To Washington Place)	Eastbound	11,801	6,681	Neg.	Neg.	11,801	6,681
Bedford Avenue (From Arthur Street to Roberts Street)	Eastbound	1,420	1,064	Neg.	Neg.	1,420	1,064
Bedford Avenue (From Arthur Street to Roberts Street)	Westbound	1,497	1,155	101	102	1,598	1,257

LOCATION	DIRECTION	NUMBER OF TRIPS					
		2006 BASE CONDITIONS ¹⁾		MASTER PLAN TRIPS ²⁾		2008 COMBINED CONDITIONS	
		FRIDAY	SATURDAY	FRIDAY	SATURDAY	FRIDAY	SATURDAY
Webster Avenue (From Arthur Street to Roberts Street)	Eastbound	546	431	Neg.	Neg.	546	431
Webster Avenue (From Arthur Street to Roberts Street)	Westbound	506	494	Neg.	Neg.	506	494
Wylie Avenue (From Arthur Street to Roberts Street)	Eastbound	574	496	Neg.	Neg.	574	496
Wylie Avenue (From Arthur Street to Roberts Street)	Westbound	500	479	Neg.	Neg.	500	479
Centre Avenue (From Arthur Street to Roberts Street)	Eastbound	9,431	3,012	204	205	3,635	3,217
Centre Avenue (From Arthur Street to Roberts Street)	Westbound	2,736	2,378	101	102	2,837	2,480
Dinwiddle Street (From Centre Avenue to Rose Street)	Northbound	2,079	1,922	Neg.	Neg.	2,079	1,922
Dinwiddle Street (From Centre Avenue to Rose Street)	Southbound	1,783	1,594	Neg.	Neg.	1,783	1,594
Forbes Avenue (From Magee Street to Stevenson Street)	Eastbound	11,637	8,274	Neg.	Neg.	11,637	8,274
Fifth Avenue (From Stevenson Street to Pride Street)	Westbound	11,288	8,428	7,713	7,741	19,001	16,169
Washington Place (From Fifth Avenue to Colwell Street)	Northbound	9,747	6,581	2,103	2,818	11,850	9,399
Washington Place (From Fifth Avenue to Colwell Street)	Southbound	6,444	4,440	363	Neg.	6,827	4,440

LOCATION	DIRECTION	NUMBER OF TRIPS					
		2006 BASE CONDITIONS ¹⁾		MASTER PLAN TRIPS ²⁾		2008 COMBINED CONDITIONS	
		FRIDAY	SATURDAY	FRIDAY	SATURDAY	FRIDAY	SATURDAY
Stevenson Street (From Forbes Avenue to Locust Street)	Northbound	3,719	1,841	1,774	1,779	5,493	3,620
Stevenson Street (From Forbes Avenue to Locust Street)	Southbound	3,265	1,505	Neg.	Neg.	3,265	1,505

b. Trip Generation

Opportunities and Assets

- ☑ IOC estimated trip generation for the proposed 5,000 slot machine casino based upon data for a similar facility in Kansas City, Missouri. It is an urban casino with 1,555 slot machines. Based on the trip distribution matrix provided by the City, site generated traffic was assigned to the roadway network.
- ☑ There is area wide access to the site via the Cross Town Expressway, I-279, I-376 and SR-19.
- ☑ Secondary vehicular access is provided via Washington Place, Forbes/Fifth Avenues, Centre Avenue, Bedford Avenue, Grant Street, Sixth Street and Crawford/Pride Streets.
- ☑ The trip generation table below shows that the 5,000 slot machine casino will generate over 50,000 vehicle trips on a weekday and over 51,000 vehicle trips on a Saturday weekend.
- ☑ Intersection capacity calculations show that most intersections in the study area will operate at acceptable levels of service with few exceptions.
- ☑ IOC has recommended roadway physical changes and signal modifications to mitigate the traffic impacts of the casino as shown. The table of recommended improvements is included in this report.

Challenges and Liabilities

- ☑ Future peak hour traffic congestion at on Chatham Square, Bedford Avenue between Chatham Court and Washington Place, Fifth Avenue at Washington Place/Chatham Square, and the Liberty bridge ramps.

- Increased congestion is anticipated in the future. Conflict between casino traffic and PAT buses, truck loading and unloading on Fifth Avenue, pedestrian circulation, and parking and un-parking of cars will degrade the level of service on Fifth Avenue, Washington Place, and Pride Street.

Table G3 (b) Summary of Trip Generation

LAND USE	SIZE	ITE LAND USE	FRIDAY CASINO PEAK ⁽¹⁾				SATURDAY CASINO PEAK ⁽¹⁾			
			ENTERING	EXITING	TOTAL	AVERAGE DAILY TRIPS	ENTERING	EXITING	TOTAL	AVERAGE DAILY TRIPS
PITTSBURGH FIRST MASTER PLAN										
Casino	5,000 slots	-- ⁽²⁾	2,103	1,748	3,851	50,866	1,652	1,906	3,558	51,046
Hotel	400 rooms	310	112	90	202	2,566	63	49	112	2,842
Residential	1,707 units	223	264	183	447	9,127 ⁽³⁾⁽⁴⁾	264	183	447	10,023 ⁽³⁾⁽⁴⁾
Retail	71,200 S.F.	620	29	28	57	3,057 ⁽⁴⁾	36	59	95	3,558 ⁽⁴⁾
Office	200,000 S.F.	710	Neg.	Neg.	0	2,275 ⁽⁴⁾	Neg.	Neg.	0	Neg.
Subtotal, Master Plan	--	--	2,508	2,049	4,557	67,891	2,015	2,197	4,212	67,469
ISLE OF CAPRI CASINO										
Casino	5,000 slots	-- ⁽²⁾	2,103	1,748	3,851	50,866	1,652	1,906	3,558	51,046
Subtotal, Casino Only	5,000 slots	--	2,103	1,748	3,851	50,866	1,652	1,906	3,558	51,046

c. Future Levels of Service

Opportunities and Asset

- With the exception of a few minor streets, nearly every intersection in the IOC study area is signalized
- Using accepted analysis methodologies, intersection levels of service were determined for all of the study intersections under future 2008 conditions.
- The city operates a central computerized traffic control system that includes signals within the central business district. In the future, the city will extend this system to signals within the IOC project area.
- The City has extended CBD standards for signal design to the IOC study area, which includes special aesthetic mast arms, pedestrian signals and all wiring underground.
- Most of the intersections in the IOC study area will operate at acceptable levels of service in the future with the exception of a few critical intersections along Centre Avenue, Washington Place, Grant Street and Fifth Avenue.

Challenges and Liabilities

- Signal equipments and standards in the IOC study area are very old and have signals mounted on span wire on poles on the side of the road.
- Signal installations in the IOC study area generally do not include pedestrian signals.
- In the future, low levels of service will occur at the following intersections:

- o Centre Avenue at Washington Place
- o Grant Street and Sixth Street
- o Washington Place and Bedford Avenue/Bigelow Boulevard
- o Grant Street and Fort Pitt Boulevard/I-376 Ramps
- o Fifth Avenue and Washington Place/Chatham Square

Table G3 (c) Future Intersection Level of Service

INTERSECTION/APPROACH MOVEMENT	LEVELS OF SERVICE (LoS) by In seconds ¹⁾			
	FRIDAY CASINO PEAK HOUR		SATURDAY CASINO PEAK HOUR	
	2008 BASE	2008 COMBINED	2008 BASE	2008 COMBINED
Washington Place and Bedford Avenue/Bigelow Boulevard				
Eastbound Bigelow Boulevard				
• Left Turns	E61.2	C34.5	C30.5	C32.9
• Left Turns, Through, Right Turns	C24.6	C30.0	C23.5	C30.3
• Right Turns	C25.4	C25.8	C24.0	C27.2
• Approach	D49.7	C31.8	C28.2	C31.2
Northbound Washington Place				
• Through	C22.1	C31.3	C22.1	C33.0
• Right Turns	C20.1	B17.8	C20.4	B16.9
• Approach	C21.8	C30.3	C21.8	C32.5
Southbound Seventh Avenue Ramp				
• Left Turns	C27.7	C34.5	C25.3	C26.2
• Left Turns, Through	C28.4	C32.1	C26.1	C27.0
• Right Turns	-	C31.2	-	C26.2
• Approach	C28.2	C33.0	C25.9	C26.7
OVERALL INTERSECTION	C34.1	C31.3	C24.6	C31.7
Bedford Avenue and Marie Lemaire Place HOV Ramp				
Eastbound Bedford Avenue				
• Left Turns	-	C34.2	-	B19.7
• Left Turns, Through, Right Turns	-	C34.2	-	C30.4
• Approach	B11.5	C34.2	B19.2	C30.3
Westbound Bedford Avenue				
• Left Turns	-	C33.2	-	C26.3
• Through, Right Turns	-	C34.6	-	C21.7
• Approach	B19.1	C34.3	B19.2	C21.4
Northbound Marie Lemaire Place				
• Left Turns	-	C34.6	-	C22.3
• Left Turns, Through, Right Turns	-	B14.9	-	C22.3
• Approach	B19.9	C34.6	C20.2	C22.3
Southbound HOV Ramp				
Left Turns, Through	-	-	-	-
Right Turns	-	-	-	-
Approach	-	-	-	-
OVERALL INTERSECTION	B15.4	C34.3	B14.7	C22.3

Table G3 (c) Future Intersection Level of Service

INTERSECTION/APPROACH MOVEMENT	LEVELS OF SERVICE (Daily In seconds) ^{1,2}			
	FRIDAY CASINO PEAK HOUR		SATURDAY CASINO PEAK HOUR	
	2008 BASE	2008 COMBINED	2008 BASE	2008 COMBINED
Centre Avenue and Washington Place				
Eastbound Centre Avenue				
• Approach	C'23.8	F'12.3	C'23.2	L'32.3
Westbound Centre Avenue				
• Left Turn	-	B'12.3	-	C'21.2
• Left Turns, Through	C'21.3	--	C'23.2	-
• Right Turns	C'23.2	--	C'24.3	-
• Through, Right Turns	-	C'21.2	-	C'33.1
• Approach	C'21.7	C'21.2	C'23.1	C'33.1
Northbound Washington Place				
• Approach	C'22.7	F'14.1	C'22.4	L'41.9
Northeast bound Cross-town Boulevard Off Ramp				
• Approach	C'25.4	B'33.5	C'25.3	B'32.7
Southbound Washington Place				
• Detach Left Turns	-	B'33.7	-	B'31.7
• Left Turns, Through	C'20.9	C'41.4	C'20.7	C'33.8
• Right Turns	B'19.8	C'33.5	B'19.9	C'32.7
• Approach	C'20.8	F'12.9	C'20.6	D'51.9
OVERALL INTERSECTION	C'22.3	F'8.5	C'22.4	L'42.2
Centre Avenue and Crawford Street				
Eastbound Centre Avenue				
• Left Turns, Through	B'12.3	B'10.1	B'12.9	A'7.7
• Right Turns	B'12.2	C'12.1	B'12.6	C'32.6
• Approach	B'12.3	C'28.9	B'12.8	C'28.5
Westbound Centre Avenue				
• Left Turns	B'11.8	B'10.3	B'11.7	A'7.0
• Through, Right Turns	B'19.0	B'11.5	B'12.8	A'7.6
• Approach	B'12.8	B'11.3	B'12.7	A'7.5
Northbound Crawford Street				
• Approach	B'19.1	B'17.8	B'19.4	C'28.2
Southbound Crawford Street Place				
Approach	B'12.2	B'16.7	B'12.8	C'33.4
OVERALL INTERSECTION	B'12.6	C'24.6	B'12.9	C'28.7

d. Recommended Improvements

Opportunities and Assets

- Δ Based on the documented future impacts of IOC's 5,000 slot machine casino on the City's transportation infrastructure in the area, several roadway improvements have been recommended.
- Δ Generally, the roadway network in the IOC study area has the capacity to carry heavy traffic flows.
- Δ The site has excellent access to I-579, adjacent bridges, and the entire regional highway system.
- Δ The traffic signals adjacent to the site are recommended to be integrated into the City's computerized traffic control system.

Table G3 (d) Recommended Improvements

INTERSECTION	IMPROVEMENT
Centre Avenue - Washington Place to Crawford Street	<ul style="list-style-type: none"> • Reconstruct roadway, sidewalks and crosswalks to CBD standards. • Provide two through lanes in each direction, with additional lanes as noted for individual intersections. • Reconstruct median on roadway, with breaks at Lemieux Place and Casino garage exit.
Washington Place - Centre Avenue to Fifth Avenue	<ul style="list-style-type: none"> • Reconstruct roadway, sidewalks and crosswalks to CBD standards. • Provide three through lanes in each direction, with additional lanes as noted for individual intersections. • Reconstruct median on roadway, with break at Chatham Center driveway.
Centre Avenue Casino garage exit	<ul style="list-style-type: none"> • Signalize new intersection based upon CBD standards. • Construct driveway to provide one exclusive left turn lane and one shared left/right turn lane.
Centre Avenue Casino garage entrance	<ul style="list-style-type: none"> • Construct right turn lane into site driveway in addition to two through lanes.
Fifth Avenue & Magee Street	<ul style="list-style-type: none"> • Signalize driveway approach.
Site Driveway	<ul style="list-style-type: none"> • Upgrade traffic signal to CBD standards.
Fifth Avenue & Stevenson	<ul style="list-style-type: none"> • Signalize driveway approach.
Street Loading Dock Driveway	<ul style="list-style-type: none"> • Upgrade traffic signal to CBD standards.
Grant Street & First Avenue	<ul style="list-style-type: none"> • Add northbound right turn overlap phase.
Centre Avenue & Washington Place	<ul style="list-style-type: none"> • Prohibit left turns from eastbound Centre Avenue. • Add westbound advance phase. • Re-strip eastbound approach to include a shared left/through and shared through/right lanes. • Re-strip westbound approach to include an exclusive left turn lane, through lane and shared through/right lane. • Upgrade traffic signal equipment to CBD standards. • Install detection equipment on all approaches to permit fully-actuated operation.
Bedford Avenue & Crawford Avenue	<ul style="list-style-type: none"> • Re-strip eastbound approach to include a shared left/through lane and exclusive right turn lane.
Bedford Avenue & Lemieux Place HOV Ramp	<ul style="list-style-type: none"> • Upgrade traffic signal to CBD standards. • Construct northbound Lemieux Place approach as one exclusive left turn lane and one shared left/through/right turn lane.
Centre Avenue & Lemieux Place	<ul style="list-style-type: none"> • Construct eastbound left turn lane on Centre Avenue in addition to the two through lanes. • Construct southbound approach as one left turn and one right turn lane. • Upgrade existing traffic signal to CBD standards. • Add eastbound advance phase. • Add southbound right turn overlap phase. • Install detection equipment on all approaches to permit actuated operation.

INTERSECTION	IMPROVEMENT
Fifth Avenue & Washington Place/Chatham Place	<ul style="list-style-type: none"> • Upgrade traffic signal to CBD standards. • Prohibit parking for at least 150 feet along north curb line on westbound approach and install an exclusive north turn lane.
Forbes Avenue & Amelberg Tunnel Forbes Avenue & Chatham Place/McAuliffe Drive Bedford Avenue & Washington Place Bedford Avenue & Crawford Street Centre Avenue & Emerald Street/DaMiere Street Centre Avenue & Crawford Street Second Avenue & Ross Street Seventh Avenue & Smithfield Street	<ul style="list-style-type: none"> • Upgrade existing traffic signal to provide pedestrian signal on all crossings.
Bedford Avenue & Crawford Street Centre Avenue & Site Driveway Centre Avenue & Crawford Street Fifth Avenue & Magee Street Site Driveway Fifth Avenue & Stevenson Street Site Driveway Fifth Avenue & Pride Street Forbes/Magee Street Forbes Avenue & Stevenson Street Forbes Avenue & Pride Street	<ul style="list-style-type: none"> • Install fiber-optic interconnect. • Upgrade signal controller. • Integrate into City's computerized traffic control system.
All Study Area Intersections	<ul style="list-style-type: none"> • Optimize traffic signal timings. • Provide at least 6 timing plans compatible with City's control system.
General Study Area	<ul style="list-style-type: none"> • Extend City's wayfinder signage system to direct visitors to the casino and adjacent parking facilities and to direct exiting traffic to regional highways and bridges.

4. Harrah's Station Square Casino

Data Collection

Opportunities and Assets

- ∟ The roadway system at the HSSC site currently operates at acceptable levels of service with the exception of the intersection Carson Street and Smithfield Street, and the intersection of Carson Street and Arlington Avenue.
- ∟ Primary access to the HSSC casino will be via East and West Carson Street (PA-837) and the Smithfield Street Bridge.
- ∟ Secondary access via SR 51, SR-65, West End Circle, I-376 and I-279, Fort Pitt Boulevard, and Smithfield Street Bridge.
- ∟ Excellent public transit access with bus routes on Carson Street. It is also within walking distance of the Port Authority Transit Station Square T Station, Duquesne Incline, and HOV Tunnel.
- ∟ Data collection included 24-hour average daily traffic (ADT) counts on Carson Street, Smithfield Street Bridge, and Arlington Avenue. These counts are summarized in Table G4 (a).
- ∟ Peak period turning movement counts were taken at the intersections of:
 - Station Square Access Road at West Carson Street (Western Entrance/Exit);
 - Commerce Drive at West Carson Street;
 - Smithfield Street/PAT Access at Carson Street;
 - East Station Square drive/Arlington/PAT Bus way at East Carson Street; and
 - Smithfield Street Ramp/Valet Drive at West Station Square Drive.

Challenges and Liabilities

The Harrah's traffic study was inadequate in terms of the area studies, critical intersections and roadway links analyzed, amount and quality of data collected, study assumptions made, methods of analysis, and study conclusions.

- ∟ Data collection for the HSSC study was limited to the Carson Street Corridor and Smithfield Street. It did include the wider influence area of the project, including East Carson Street beyond Arlington Avenue, West End Circle, and arterials in the central business district.
- ∟ Existing peak period congestions on the Smithfield Street Bridge, Carson Street at Smithfield Street, Carson Street at Arlington Avenue, and Smithfield Street at Fort Pitt Boulevard.

Table G4 (a) Average Daily Traffic Counts

Weekday Average Daily Traffic (ADT) Volumes			
Location	2004	2002	2005
	Existing	Base	Built
West Carson Street east of Station Square Access Road	34500	25800	32700
West Carson Street west of Station Square Access Road	54400	26700	40500
West Carson Street Ramp to I-272	10100	10500	11700
West Carson Street Ramp from I-272	6200	6500	7600
West Carson Street west of Proposed Main Entrance	15100	12800	21400
West Carson Street west of Commerce Drive	15100	12800	23700
West Carson Street west of Smithfield Street Bridge	12900	20700	26500
East Carson Street east of Smithfield Street Bridge	23200	24000	26500
East Carson Street east of Arlington Avenue	16200	16800	19200
Arlington Avenue south of East Carson Street	12400	12800	14000
Smithfield Street Bridge north of Carson Street	14500	15500	12500

Table G4 (a) Average Daily Traffic Counts

Saturday Average Daily Traffic (ADT) Volumes			
Location	2004	2002	2005
	Existing	Base	Built
West Carson Street east of Station Square Access Road	14100	14600	12700
West Carson Street west of Station Square Access Road	14200	14900	22300
West Carson Street Ramp to I-272	4300	4500	6500
West Carson Street Ramp from I-272	1500	1500	3900
West Carson Street west of Proposed Main Entrance	2600	5900	11200
West Carson Street west of Commerce Drive	2600	5900	16200
West Carson Street west of Smithfield Street Bridge	12200	12600	21600
East Carson Street east of Smithfield Street Bridge	13200	13600	15200
East Carson Street east of Arlington Avenue	8000	2200	10400
Arlington Avenue south of East Carson Street	5900	6100	7200
Smithfield Street north of Carson Street	2800	2000	15700

4 Harrah's claims that Station Square draws approximately 2.5 million visitors per year and that many of these visitors (20

Percent) will become patrons of the casino. No back-up information is provided to verify projections.

- ❑ Harrah's claims that many of the casino generated trips will use other modes and not private automobiles. No documented evidence is provided to support this projection. The DCP is of the opinion that the modal split shown in the table below is too optimistic with respect to the use of public transportation modes to access the site.
- ❑ The assumptions are not comparable with those provided by Isle of Capri and Majestic and are not sustainable.
- ❑ Harrah's contention that installation of Intelligent Transportation Systems (ITS) devices will improve the efficiency and operation of the streets and parking facilities serving Station Square is no more than a claim that has yet to be designed and tested. The Department of City Planning believes that ITS technology will have little or no effect on peak hour congestion and traffic operation to and from the casino garages.

Table G4 (b) Modal Split Assumptions

Harrah's Station Square Casino Weekday Modal Split		Daily 24 Hours		(Peak Hour) (4:30 - 5:30 PM)	
Patrons by:	%	Inbound		Outbound	
Public Transit					
Light Rail and Public Bus	10% (15%)	2,200	(195)	2,200	(218)
Tour Bus, Charter Bus and Shuttle	5% (10%)	1,100	(130)	1,100	(145)
Tricycles, Boat, Bicycle and Walk	5% (5%)	1,100	(65)	1,100	(73)
By Taxi and Limousine Service	10% (10%)	2,200	(130)	2,200	(145)
By Private Automobiles	70% (60%)	15,400	(778)	15,400	(871)
Total		22,000	(1,298)	22,000	(1,452)
Employees by:	%				
Public Transit					
Light Rail and Public Bus	25% (25%)	450	(123)	450	(88)
Employee Shuttle Bus	10% (10%)	180	(35)	180	(25)
Tricycles, Boat, Bicycle and Walk	5% (5%)	90	(17)	90	(12)
By Taxi and Limousine Service	0% (0%)	0	(0)	0	(0)
By Private Automobiles	50% (50%)	1,080	(175)	1,080	(125)
Total		1,800	(350)	1,800	(250)

- ❑ Harrah's assumes that the 5,000 slot machine casino will generate 24,000 patrons on a design weekday, 30,000 patrons on a design Friday, and 50,000 patrons on a design Saturday. These daily trips were converted to vehicle trips as shown in Table G4 (c) below.

Table G4 (c) Trip Generation Tables

Patrons by:	Weekday	Daily 24 Hours	(Peak Hour) 4:30 - 5:30 PM	
			Inbound	Outbound
	Persons/Veh		New Vehicles	
			Inbound	Outbound
Public Transit:				
Light Rail and Public Bus	NA	0	(3)	0
Tour Bus, Charter Bus and Shuttle	20	55	(8)	55
Inclines, Boat, Bicycle and Walk	NA	0	(0)	0
By Taxi and Limousine Service	2.6	883	(52)	883
By Private Automobiles	2.6	6,160	(312)	6,160
Total		7,095	(372)	7,095
Employees by:	%			
Public Transit:				
Light Rail and Public Bus	NA	0	(0)	0
Employee Shuttle Bus	10	18	(4)	18
Inclines, Boat, Bicycle and Walk	NA	0	(0)	0
By Taxi and Limousine Service	NA	0	(0)	0
By Private Automobiles	1.1	982	(159)	982
Total		1,000	(163)	1,000

Table G4 (c) Trip Generation Tables

	New Vehicles Generated	
	Inbound	Outbound
Design Weekday (24 Hours)		
Casino Patrons	7,095	7,095
Casino Employees	1,000	1,000
	8,095	8,095
Design Weekday (4:30 - 5:30 PM)		
Casino Patrons	372	415
Casino Employees	163	118
	535	533
Design Friday (24 hours)		
Casino Patrons	8,901	8,901
Casino Employees	1,111	1,111
	10,012	10,012
Design Friday (4:30 - 5:30 PM)		
Casino Patrons	467	521
Casino Employees	186	129
	653	650
Design Saturday (24 hours)		
Casino Patrons	11,933	11,933
Casino Employees	1,222	1,222
	13,155	13,155
Design Saturday (7:00 - 7:00 PM)		
Casino Patrons	824	730
Casino Employees	0	0
	824	730

Challenges and Liabilities

- ❑ Harrah's modal split assumptions are not comparable with modal split assumptions made by Isle of Capri and Majestic Star.
- ❑ DCP is of the opinion that the HSSC will generate more vehicular trips than the report has estimated. This will adversely impact the level of service of intersections and Driveways on Carson Street and Smithfield Street.

Intersection Levels of Service

Opportunities and Assets

- ✓ Harrah's conducted capacity analysis to determine future traffic conditions under build and no build scenarios.
- ✓ Harrah's analysis shows that, under 2008 future conditions, critical study intersections will operate at acceptable levels of service (LOS) A through E.
- ✓ HSSC has recommended improvements to Smithfield Street and Carson Street to improve the operations efficiency of critical study area intersections. Tables G4 (d) and G4 (e) below show the future 2008 LOS and recommended improvements.

Challenges and Liabilities

- ✗ DCP is of the opinion that there will be significant degradation in levels of Service at the Intersection of Carson Street and Smithfield Street, Carson Street and Arlington Street, and operations at the porte-cochere, contrary to what the report shows.

Table G4 (d) Intersection Level of Service

Harrah's Station Square Casino

Location	Weekday PM Peak Hour Signalized Intersection Volumes/Level of Service							
	2004		2008		2008		2008	
	Existing		Base		Build		Build/Improved	
	Vol.	LOS	Vol.	LOS	Vol.	LOS	Vol.	LOS
West Carson Street and Station Square Access Road	2527	E	2021	B+	3585	E	3585	C
West Carson Street and Proposed Main Entrance	-	-	-	-	1935	A	1239	A
West Carson Street and Commerce Drive/Parking Lot	1717	E	1765	B	2277	B	2277	B
West Carson Street and Wabash Tunnel	1572	A	1745	A	2285	A	2285	A
Carson Street and Smithfield Street/Port Authority Access	2256	C	2575	C	2274	D	2574	C
East Carson Street and Busway/Arlington Avenue/ East Station Square Drive	2125	D	2275	D	2532	E	2532	D

Harrah's Station Square Casino

Location	Saturday PM Peak Hour Signalized Intersection Volumes/Level of Service							
	2004		2008		2008		2008	
	Existing		Base		Build		Build/Improved	
	Vol.	LOS	Vol.	LOS	Vol.	LOS	Vol.	LOS
West Carson Street and Station Square Access Road	1191	A	1254	A	2098	C	2098	B
West Carson Street and Proposed Main Entrance	-	-	-	-	1346	A	1346	A
West Carson Street and Commerce Drive/Parking Lot	1055	B	1072	B	1863	B	1853	B
West Carson Street and Wabash Tunnel	1264	A	1105	A	1879	A	1879	A
Carson Street and Smithfield Street/Port Authority Access	1239	A	1255	A	2001	C	2001	B
East Carson Street and Busway/Arlington Avenue/ East Station Square Drive	1222	C	1262	C	1440	C	1440	C

Recommended Improvements

Table G4 (e) Recommended Phase 1 Improvements

Harrah's Station Square Casino

Recommended Phase One Improvements and Cost Estimates		
Location	Improvements	Cost Estimate
The existing east access driveway at Arlington Avenue and Carson Street	<ul style="list-style-type: none"> Widened to accommodate three exit lanes 	\$44,500
The intersection of Carson Street and Smithfield Street	<ul style="list-style-type: none"> A pedestrian overpass across Carson Street An exclusive westbound right turn lane An additional southbound right turn lane 	\$3,609,000
The existing Station Square entrance only driveway on Smithfield Street	<ul style="list-style-type: none"> The existing Station Square entrance widened for two lanes at its intersection with Station Square Drive 	\$6,000
The existing Commerce Street driveway on Carson Street	<ul style="list-style-type: none"> The center median in the driveway (Commerce Street) will be closed and relocated to the east to accommodate a single entry lane and three southbound exit lanes The traffic signal phasing will be converted to a split phase operation for the northbound and southbound movements 	\$16,500
The existing access driveway west of the parking garage	<ul style="list-style-type: none"> The existing access driveway will be widened to accommodate three northbound entrance lanes and one southbound exit lane Carson Street will be widened at this intersection to accommodate an eastbound left turn lane Signalization 	\$169,500
New exit only driveway on Carson Street (approximately 1000 feet west of Commerce Street)	<ul style="list-style-type: none"> The driveway will have two southbound exit lanes Signalization 	\$81,500
New entrance only driveway on Carson Street (approximately 1600 feet west of Commerce Street)	<ul style="list-style-type: none"> The driveway will have two northbound entry lanes Carson Street will be widened at this intersection to accommodate an eastbound left turn lane 	\$35,500
The existing west access driveway at Carson Street	<ul style="list-style-type: none"> The driveway will be reconfigured for one inbound lane and three outbound lanes at Carson Street 	\$50,000
Traffic control system and intelligent transportation system upgrades		\$900,000

Note: This cost estimate does not include costs associated with acquiring R/W and performing utility relocations or those associated with roadway / traffic signalization design or design of the pedestrian overpass.

5. MAJESTIC STAR CASINO

Site Location and Data Collection

Opportunities and Assets

- ✓ Primary access via Reedsdale Street and North Shore Drive.
- ✓ Secondary access via SR 51, SR-65, SR-28, I-279, and HOV Lane to North Shore Drive or Reedsdale Street.
- ✓ Public transit access is problematic and inadequate.
- ✓ MSC staff conducted field studies, including observations along the frontage of the site and at adjacent intersections to review general traffic operations, sight distance at existing and potential driveway access locations and intersection operations.
- ✓ Traffic count data at adjacent intersections were obtained from manual turning movement counts.
- ✓ Seven day ATR counts were also conducted on Reedsdale Street between Allegheny Avenue and Fontella Street

Challenges and Liabilities

- ✓ Pedestrian access is unsafe and problematic.
- ✓ The MSC site is near SR-65, I-279, SR-28, SR-51, and the West End Bridge, but direct access is problematic due to existing roadway physical geometrics and directional flow.
- ✓ A key constraint is that Reedsdale Street and North Shore Drive (along the frontage of the site) are currently one-way eastbound streets. In addition, there are currently four lanes on North Shore Drive adjacent to the site. North Shore Drive is fed by West End Bridge, Reedsdale Street, and SR-65.
- ✓ There is currently a significant difference between peak AM traffic volumes and peak Pm traffic volumes. In the AM, approximately 1,000 southbound vehicles pass the site on North Shore Drive. In the PM, this trend is reversed with only 300 vehicles per hour passing the site.
- ✓ Traffic volumes from a Pittsburgh Steelers game were obtained for future analysis purposes.

Trip Generation

Opportunities and Assets

- ✓ Person Trip generation for the MSC proposal was estimated using various principles, including Institute of Transportation Engineers (ITE) trip generation factors.
- ✓ Daily attendance estimates were derived from attendance data at another MSC site and Trump Casino in Indiana.

- z Vehicle trip generation was calculated based on 90 percent arrival via private automobile and 10 percent via other modes, including transit, taxi, walk, and charter bus.
- z Vehicle occupancy was estimated at 1.5 persons per auto on weekdays and 2.0 persons per auto on Fridays and Saturdays.
- z Below are tables showing the number of patrons and employees for a 5,000 slot casino, and the corresponding vehicle trips for a Friday and Saturday for a 24-hour day and peak period.

Challenges and Liabilities

- z MSC has used conservative estimated to generate trips for this site, so there are no obvious challenges or liabilities associated with this approach. Table G5 (a) below shows trip generations for a typical weekday and weekend conditions.

Table G5 (a) Trip Generations

Daily Patrons	Estimated Daily Visits Per 5000 Slots	Daily Visit Design Levels	Estimated Daily Vehicle Trips
Weekday	17,611	20,000	24,000
Friday	25,268	30,000	36,000
Saturday	30,934	36,000	32,400

Peak Hour Persons		Peak Hour Vehicle Trips		
Peak Period	Inbound	Outbound	Inbound	Outbound
A.M. Friday	420	350	210	180
P.M. Weekday	2,690	2,100	1,350	1,050
P.M. Saturday	4,010	2,940	2,000	1,470

- z The table below show weekday vehicle volumes for 2005 existing conditions and 2008 design year conditions

Location	2005 Weekday ADT	2008 Weekday ADT	2008 Total Weekday ADT with Casino
Reedsdale Street	1,740	1,770	13,290
Allegheny Avenue	4,425	4,500	14,760
North Shore Drive	6,370	6,470	21,230

- Table below shows the assumed mode split for Majestic Star patrons and employees.

Mode	Employees	Patrons
Pedestrians	2%	2%
Taxis	0%	3%
Limousines	0%	1%
Public Transit	10%	2%
Charter Buses	0%	2%
Private Auto	88%	90%

Future 2008 Intersection Levels of Service

Opportunities and Assets

- ☑ Under existing conditions, the morning weekday peak hour experiences higher traffic demand than the P.M. peak hour.
- ☑ There does not appear to be any capacity issues at adjacent signalized intersections during the A.M., P.M. or Saturday peak hours under existing 2005 and design year 2008 conditions without the casino.
- ☑ During the weekday peak period, MSC avers that casino traffic can be accommodated without any significant problems.

Challenges and Liabilities

- ☑ With the casino in place, the project area intersection will still operate at an acceptable level of service except the intersection of Reedsdale northbound on Allegheny, and Reedsdale at North Shore Drive. Significant peak hour queuing is anticipated in the future.
- ☑ On a Steelers football Sunday, there will be significant traffic congestion with complete failure conditions at the intersections of Allegheny/Reedsdale, and Allegheny/North Shore. There will also be significant degradation in the level of service at the intersection of Reedsdale/North Shore Drive. The future 2008 LOS is shown below.
- ☑ The tables on the following page show that with Saturday peak hour trip generation assumed at approximately 4,000 two-way trips, Reedsdale Street would begin to experience capacity problems.

Weekday Total 2008 Intersection Operations

Intersection	Period	Total Int. Volume	Overall LOS	Critical		Comments
				LOS	V/C	
Allegheny/Reedsdale	A.M. Peak	1892	A	C	0.60	No significant delays
Allegheny/North Shore		887	A	B	0.36	No significant delays
Reedsdale/North Shore		1738	B	C	0.53	No significant delays
North Shore/Porte Cochere		1298	A	C	0.34	Delay for eastbound traffic exiting casino
Reedsdale/Lighthill		853	C	D	0.62	Westbound left delay
Allegheny/Reedsdale	P.M. Peak	2499	C	E	0.85	Northbound through delay
Allegheny/North Shore		1585	A	B	0.59	No significant capacity issues
Reedsdale/North Shore		2947	B	C	0.82	Eastbound left queuing 200 feet
North Shore/Porte Cochere		1827	B	C	0.58	No significant capacity issues
Reedsdale/Lighthill		2035	B	D	0.68	Westbound left delay

Note: Critical movements generally defined as V/C >0.85

Saturday P.M. Total Peak Hour Intersection Operations

Intersection	Period	Int. Volume	Overall LOS	Critical		Comments
				LOS	V/C	
Allegheny/Reedsdale	Saturday Evening Peak	2945	D	E	1.00	Westbound through operating at capacity
Allegheny/North Shore		1772	B	B	0.62	No significant capacity issues
Reedsdale/North Shore		3482	D	E	1.02	Eastbound left queuing 600 feet
North Shore/Porte Cochere		2231	B	D	0.69	No significant capacity issues
Reedsdale/Lighthill		2674	C	D	0.83	Westbound left delay

Recommended Improvements

Opportunities and Assets

- ❑ With modifications to the roadway network and installation of new signals at key intersections, Majestic Star claims that it will have minimal impact on the City's transportation infrastructure.
- ❑ MSC will provide westbound traffic on North Shore Drive access to the porte-cochere and will install a new signal at the intersection of North Shore Drive with the porte-cochere. The table below shows the recommended improvements and associated costs.
- ❑ MSC recommends a new traffic signal installation and reconfigurations at the Reedsdale Street/North Shore Drive intersection.
- ❑ MSC recommends a new traffic signal installation and intersection reconfiguration at the proposed porte-cochere entrance and North Shore Drive. The recommended improvements and associated costs are shown below

Table F2 Comparative Ratings

**TRANSPORTATION AND
PARKING ANALYSIS**

CASINO EVALUATION CRITERIA	WEIGHT	ISLE OF CAPRI		HARRAH'S STATION SQUARE		MAJESTIC STATION	
		AVG.	WEIGHTED SCORE	AVG.	WEIGHTED SCORE	AVG.	WEIGHTED SCORE
CONVENIENT REGIONAL HIGHWAY ACCESS	4	2.17	8.68	1.67	6.68	1.33	5.32
CONVENIENT LOCAL ACCESS BY CAR	3	3.22	9.66	2.44	7.32	2.33	6.99
ACCESSIBLE BY PUBLIC TRANSIT	3	1.79	5.37	2.07	6.21	1.21	3.64
ACCESSIBLE TO PEDESTRIANS	1	3.29	3.29	3.07	3.07	1.86	1.86
PROVIDES ADEQUATE PARKING ON OR ADJACENT TO THE SITE	2	3.63	7.26	3.25	6.50	3.38	6.76
ADEQUATE SPACE FOR BUS, TAXI, AND OTHER COMMON CARRIER TRANSPORTATION, INCLUDING LOADING AND UNLOADING	3	3.40	10.20	3.20	9.60	3.20	9.60
MINIMIZES POTENTIAL FOR TRAFFIC CONGESTION	4	3.00	12.00	2.11	8.44	2.00	8.00
			56.46		47.82		42.17



CITY OF PITTSBURGH
Department of City Planning
Strategic Planning Division



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: William Peduto

Address

Telepho

Organization, if any: Pittsburgh City Council

Employer: City of Pittsburgh

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

burgl.

Comments: Page 2 (continued)

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



WILLIAM PEDUTO



COUNCILMAN, CITY OF PITTSBURGH
COMMITTEE ON GENERAL SERVICES, TECHNOLOGY AND THE ARTS, CHAIR
June 1, 2006

Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg, PA 17106

Dear Gaming Control Board Members:

I am writing to you regarding the study prepared by the City of Pittsburgh Department of City Planning on the impact of each of the three Pittsburgh casino applicants. It was with great disappointment that I reviewed this study and learned of its submission to the Board as a representation of the input from the "local political subdivision."

As an elected official who represents almost 40,000 residents of the City of Pittsburgh, it is inconceivable that this study was sent to the Board without any consultation or vote of Pittsburgh City Council or even the Pittsburgh City Planning Commission. Instead, this study was prepared by staff at the Planning Department and received no legislative endorsement or oversight. In the City of Pittsburgh, issues involving land use require the vote of the Planning Commission and/or City Council; this report was voted on by neither body. I do not believe that this study accurately reflects the impact each of the applicant's proposals will have on the City of Pittsburgh, and I do not believe that this study represents the input of the "local political subdivision" that was the legislative intent of the General Assembly when it passed legislation legalizing gaming in Pennsylvania.

There are four areas in which I believe this study fell short of providing an accurate assessment of the impact of gaming on our neighborhoods.

- First, the information assessed by the Planning Department was not standardized. The staff relied entirely on figures provided by the applicants and ignored whether or not these figures were consistent with industry standards. This study lost any attempt at impartiality, when industry standards were not used to create a level playing field.
- Second, net revenue projections and the subsequent financial windfall to the City were not considered for any of the proposed plans. Immediate revenues generated from a temporary casino, future revenue from supplemental development, and the loss of tax dollars associated with having to fund a new arena or provide TIF and/or tax abatements to certain proposed plans are all significant factors that should have been considered.
- Third, report went so far as to not even include commitments contained in the applications, including Isle of Capri's legal obligation to provide \$290 million towards a new arena.

- Fourth, supplemental development proposed by the applicants was not given any weight in the study. Each of the applicants has outlined development around the proposed casino that would have a tremendous impact on the neighborhood, City, and region. It is inconceivable that a study could be prepared that ranked the applicant's impact on the City of Pittsburgh, but does not take into consideration revenue, promised financial support and development, or supplemental development.

As an elected official, I hope that the Board will not consider this study to be input from the "local political subdivision." This report is simply a staff report of one department of the City; without any legislative support or action, it would be unjust to characterize this report as anything more.

Sincerely,


William Peduto



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: James Motznik

Address: _____

Telephone: _____ Pittsburgh

Organization, if any: Pittsburgh City Council

Employer: Residents of City Council District 4

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

See attached letter and study.



JIM MOTZNIK

*Councilman, City of Pittsburgh
President Pro Tem*



Office of the Clerk
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106

To Whom It May Concern:

My name is Jim Motznik and as the elected representative of the 4th Council District of the City of Pittsburgh I am writing to express my dissatisfaction with the recent gaming impact report prepared by the City of Pittsburgh Planning Department.

On May 22, 2006, the City of Pittsburgh Planning Department Director, Pat Ford, presented to City Council the Department's evaluation of the three proposed casinos entitled *An Analysis of Proposed Casino Developments and their Impacts on the City of Pittsburgh*. As I stated during council, "this report is not worth the paper it's printed on." The Planning Department utilized data prepared by the three companies competing for the gaming license. Much of this self promotional data has already been called into question by various independent reporting agencies. In my opinion, using this information as the basis for the City's report renders it valueless.

Particularly troubling is that the Planning Department report gives the Forrest City location its highest rating; yet it questions the site's ability to handle the traffic impact. How can you have the best location, if patrons can't get to it?

I have attached an independent study, *Traffic Impact Analysis Critique*, by David Wooster E. & Associates, Inc. prepared for the Pittsburgh Gaming Task Force which raises serious questions regarding Forrest City's transportation analysis. I would ask that the Pennsylvania Gaming Control Board accept this report as part of the evidentiary record.

Sincerely,

James Motznik, Councilmember
City of Pittsburgh District 4

Pittsburgh Gaming Task

Traffic Impact Analy Critique

Prepared by

David E. Wooster and Associates, Inc.

Reports Reviewed

- The Majestic Star Casino, Pittsburgh – Traffic and Parking Assessment Final Report, December 2005 prepared by IBI Group
- Harrah's Station Square Casino – Transportation Analysis, December 2005 prepared by D & GAI Consultants
- Pittsburgh First Master Plan – Traffic and Transportation Study, December 2005 prepared by Tran

Basic Traffic Study Outline

- Collect base traffic data
- Forecast to horizon year without development to establish base condition
- Analyze base condition
- Forecast trip generation
- Estimate trip distribution
- Superimpose generated traffic on base condition
- Analyze forecasted "build" condition
- Mitigate identified impacts

Basis of Review

Trip generation and trip distribution are the critical component of traffic studies

Comparison of all assumptions relative anticipated trip generation

Results of trip generation and trip distribution their impact on study area

Applicability of captured trips & modal

Practicality of improvements

Trip Generation Components

Trip Modes

- Automobile trips
 - Vehicle Occupancy Rates
- Transit trips
- Other tripmaking

Trip types

- Primary trips
- Pass-by trip
- Captured trip

Analysis Time Period

- Weekday AM peak hour (a.m. rush)
- Weekday PM peak hour (p.m. rush)
- Peak Event Periods
- Peak hour of site generation on a F
- Peak hour of site generation on a S

Majestic Star Casino

- Proposed 5000 slot casino
- Daily trip generation estimated using an average of 20,000 daily person visits derived from similar casinos in Indiana (20k weekday, 30k Friday, 30k on Sun.)
- Hourly trip generation determined by an average of arrival/departure rates obtained from Casinos in Niagara
- Modal split – 90% auto – 10% other
- Vehicle occupancy – 1.5 persons/veh. v and 2.0 on weekends

Harrah's Station Square Casino

Proposed 4000 slot casino

Daily trip generation assumed to be 24k on
weekday and 40k on Sat.

Hourly trip generation determined by applying
arrival/departure rates obtained from reports
published by ITE

Modal split - 70% auto - 30% other for patrons
and 50% auto and 50% others for employees

Vehicle occupancy - 2.5 persons/veh. for patrons
and 1.1 persons/veh. for employees

Pittsburgh First Cas

Proposed 5000 slot casino

Daily trip generation estimated using an
daily person visits derived from similar
Kansas City (24.3k weekday, 29.9k Fri
30k on Saturday)

Hourly trip generation determined by an
arrival/departure rates obtained from IT

Modal split – No adjustment

Vehicle occupancy – 1.18 persons/veh.

Trip Generation Comparison



Total Hourly Trip Generation	
Majestic Casino	Pittsburgh First Casino
Harrah's Casino	1096
390	2456
Not reported	3851
2400	3558
Not reported	2332
3470	
AM Peak Weekday	
PM Peak Weekday	
Friday PM Peak	
Saturday Peak	
Event Peak	

Findings – Majestic

- Did not analyze Friday Peak

- Scope of Study limited. Impacts of study area may be significant.

- Proposed mitigation measures are

Findings – Harrah'

Harrah's Casino Report trip generation underestimated

Application of captured trip percentage appropriate

Application of current Station Square v occupancy not applicable

Did not analyze AM Peak, Friday Peak Peak as requested

Scope of Study limited. Impacts outside area may be significant.

Findings – Pittsburgh

- Pittsburgh First anticipated trip generation conservative
- All peak hours analyzed
- Study Scope appear proportional to project development plans.
- Study includes impact of additional project development
- Proposed mitigation strategies are fully detailed and cost estimates provided



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: Tonya D. Payne

Address: _____

Telephone _____

Organization, if any: Pittsburgh City Council

Employer: City of Pittsburgh

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

Please enter the attached documents into the evidentiary record.

rgh.

Comments: Page 2 (continued)

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

Tonya D. Payne



TONYA D. PAYNE

Councilwoman, City of Pittsburgh - District 6

Chair, Committee on Housing, Economic Development and Promotion



June 2, 2006

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

Dear Members of the Gaming Control Board:

I am writing to you today in my capacity as the Pittsburgh City Council Representative for Council District 6, an area that includes the Hill District and Uptown neighborhoods, as well as Downtown, Pittsburgh. I am writing in order to express my disappointment and disagreement with the City of Pittsburgh Planning Department's report, An Analysis of Proposed Casino Developments and Their Impacts on the City of Pittsburgh, dated April 25, 2006.

As a member of Pittsburgh's City Council, I do not support the findings contained in this report, nor do I believe that the information used to support these findings was independently obtained by the Planning Department, despite claims made by the Department. It was my understanding that the Planning Department relied heavily upon the information provided to them by the applicants. Pat Ford, the City's Planning Director, stated, however, that the report is independent and objective. For me, the question remains, how can a report be independent and objective, when the information and methodology relied upon are not?

It is consequent to these facts, that I am kindly requesting that the Pennsylvania Gaming Control Board accept into the evidentiary record, the following rebuttal statement, as prepared by Isle of Capri Casinos, Inc. I believe that this statement from Isle of Capri succeeds in accurately identifying the misrepresentations and misstatements contained in the Planning Department's report.

Sincerely,

Tonya D. Payne

Pittsburgh City Councilwoman, Council District 6

**Response to City of Pittsburgh Department of City Planning's
Report – *An Analysis of Proposed Casino Developments and their
Impacts on the City of Pittsburgh*
(April 25, 2006)**

Prepared by Isle of Capri Casinos, Inc.

Executive Summary

On May 22, 2006, the City of Pittsburgh Department of City Planning, Strategic Planning Division (the "Planning Department") presented its report, *An Analysis of Proposed Casino Developments and their Impacts on the City of Pittsburgh (April 25, 2006)* (the "Report"), to the City Council. The Planning Department had been enlisted by Mayor O'Connor to evaluate the three casino proposals for the single gaming license for the City of Pittsburgh.

From the start, the Report is riddled with inaccurate statements, inconsistencies, and mistakes. Scoring inconsistencies and randomness of weighting are rampant. Wrong numbers appear to have been taken from the back-up tables, which affect the scoring totals. The information referenced in the Report varies widely from the detailed Isle traffic study to almost impressionistic sources. The descriptive language ranged from analytical to lyrical. These factors call into question the objectivity and intent of this Report.

The categories and criteria for review, and the average score system and weighting system utilized in the Report are all susceptible to manipulation and misinterpretation. Although on the surface the process may appear to be rational and scientific, in practice such procedures are often subjective, rather than objective. It was not made known how and by whom the categories and criteria were chosen and how the weighting factors were decided. Furthermore, it was not stated how votes were counted in the average score for each category and criteria. Were the vote based on the views of the seven people listed at the front of the Report? If not, who was involved and how did it work? Was the analysis done incrementally and judged incrementally by a specialist in each category, or were the materials all reviewed and judged by the group as a whole? Were outside consultants used? If so, who? Was the study reviewed and revised by others inside or outside City government before it was released?

The Report is essentially an opinion, based on loose anecdotes and self reporting data that has already been proven to be inaccurate and exaggerated in some instances (i.e., Station Square's traffic and revenue projections). Information used to evaluate the proposals came from the casino operators themselves, as well as from industry publications, internet research and phone conversations. They considered property comparisons based on photos and websites without actually touring any facilities or doing any objective analysis, calling into question the credibility of the analysis underlying Report.

It is also clear that Report was engineered to achieve a particular outcome -- for the proposed Station Square casino to come out on top. The tone of the descriptions and adjectives used favor the Station Square casino to a highly exaggerated degree. The weighting and repetition of certain criteria advance the strengths of the Station Square casino. And in the first paragraph under Introduction, they address the proponents of the three proposals based on the operators, rather than the actual gaming license applicants (Harrah's is only an operator and not an applicant). The Report specifically states:

"Three casino operators, in concert with local developers and land owners, have applied for the Pittsburgh license - PITG Gaming, LLC (Majestic Star Casino), Harrah's Entertainment, Inc. (Harrah's Casino) teamed with Forest City Enterprises, and Isle of Capri Casino teamed with the Pittsburgh Penguins."

In reality, the applicant for the Station Square casino is Station Square Gaming, comprised of Forest City Enterprises and a number of individuals ("FCE"); Harrah's Entertainment ("Harrah's") is not an owner of that entity, but rather just the manager of the proposed casino. Although the operating history of the manager is relevant to the analysis, the financial strength of the applicant (not the manager) is what is germane, as the owner is the party with the financial responsibility for funding the project. With respect to Isle of Capri's ("Isle") application, the Pittsburgh Penguins are not a party to the application, nor are they a "local developer" or "land owner" with respect to the casino (although they do own the hospital property upon which the new arena would be built).

Further, in most categories, the Planning Department only considered the casino aspect of the proposals, and therefore did not take into consideration the impact of a new multi-purpose arena (of which Isle is committed to contribute \$290 million for the construction within 90 days of being awarded the license) and a major mixed-use redevelopment project in the Hill District adjacent to Isle's casino. However, they do address the interplay between Station Square and the proposed FCE casino often. If the Planning Department is not looking at the corollary development benefits to the community, who is?

Analysis

The Report's outcome is manipulated from the outset. In the first paragraph under Introduction, the Report addresses the proponents of the three proposals based on the operators, rather than the actual gaming license applicants (Harrah's is only an operator and not an applicant). The Report specifically states:

"Three casino operators, in concert with local developers and land owners, have applied for the Pittsburgh license - PITG Gaming, LLC (Majestic Star Casino), Harrah's Entertainment, Inc. (Harrah's Casino) teamed with Forest City Enterprises, and Isle of Capri Casino teamed with the Pittsburgh Penguins."

In reality, the applicant for the Station Square casino is Station Square Gaming, LP, owned by Forest City Enterprises and a number of individuals. Harrah's is not an owner of that entity, but rather just the manager of the proposed casino. Although the operating history of the manager is relevant to the analysis, the financial strength of the applicant (not the manager) is what is germane, as the owner is the party with the financial responsibility for funding the casino. Regarding Isle, the Pittsburgh Penguins are not a party to the application, nor are they a "local developer" or "land owner" with respect to the casino (although they do own the hospital property upon which the new arena would be built).

The Planning Department evaluated the proposals based on six categories: location; operator; site plan; design; socioeconomic; and traffic and parking; with different evaluation criteria in

each category and weighting assigned to each criteria. The categories for review, the weighting system, and the average score system utilized in the Report are all susceptible to manipulation and misinterpretation. Although on the surface the process may appear to be rational and scientific, in practice such procedures are often subjective, rather than objective, as we believe was the case here.

It was not made known how and by whom the categories and criteria were chosen and how the weighting factors were decided. Furthermore, it was not stated how votes were counted to obtain the average score for each category. Were the votes based upon the views of all seven people listed at the front of the Report? If not, who was involved and how did it work? Was the analysis done incrementally and judged incrementally by a specialist in each category, or were the materials all reviewed and judged by the group as a whole? Were outside consultants used? If so, who? Was the study reviewed and revised by others inside or outside City government before it was released? These are questions that are critical to an understanding of the Report and the conclusions stated therein.

The information referenced in the Report varies widely from the detailed Isle traffic study to impressionistic sources. The descriptive language ranges from analytical to lyrical. Throughout the Report, the tone of the descriptions and adjectives used favor FCE to a highly exaggerated degree, as does the benefit of a doubt regarding assumptions and estimates.

In the descriptions of the three proposals starting on page 3 of the Report, the Planning Board accepts FCE's estimate of \$550 million annual revenues (although they do not address the number of machines the estimate is associated with), which revenue figure has been called into question by many industry experts, without any independent analysis. In addition, they reference the \$25 million donation to the Pittsburgh History and Landmarks Foundation, which is actually not a new promise but rather a contractual obligation of FCE based on its original acquisition of the site over 10 years before.

Regarding Isle's proposal, although the Planning Board is aware that Isle and the Penguins have entered into an agreement with Nationwide Realty Investors, Ltd. to develop the adjoining 28 acres and have conceptual plans for the redevelopment, the Report states on page 3 that the parties are just "in talks." Note that not only were they advised about the agreement, but both Nationwide and Isle representatives spoke at the Pennsylvania Gaming Control Board ("PGCB") public input hearings in Pittsburgh (the "Public Hearings") from which the Planning Board claims to have obtained information upon which they have relied (page 1)) about the detailed plans for the redevelopment. Further, a model of the conceptual plans was on display at the Public Hearings. The Report also fails to mention the proposed size of the investment (estimated to be at least \$350 million) and simply refer to it as a "proposed mixed-use development." We can only assume that this was intended to downplay the level of commitment of Nationwide and Isle to the redevelopment and to support the Planning Board's future unfounded assertions that the proposed development is neither guaranteed nor committed. Isle has committed to the PGCB in its application to follow through with the redevelopment, in addition to the \$290 million it has agreed to contribute for the construction of the new arena within 90 days of receiving the license.

The Report also downplays the significance of Pittsburgh First which is referred to simply as a partnership created by the Isle "team". The Report unfairly categorizes the purpose of Pittsburgh First: "The partnership has been publicizing the benefits of the proposal to the community. It is unclear what their role will be should the casino be awarded the license." However, multiple times throughout the materials provided to the Planning Department in connection with their analysis, and during the Public Hearings, it was explained that Pittsburgh First is a coalition of Isle, the Pittsburgh Penguins, Nationwide Realty and the community, who's role it is to work with the community "to make certain that the proposed project has an overall positive effect on its host community." As such, that clearly is not a role that would end upon the award of the license.

Note that with regard to the description of the proposed Majestic Star/PITG Casino ("Barden"), the Report includes the proposal to contribute \$7.5 million per year for 30 years (which actually totals \$225 million, but the Reports erroneously totals it to \$300 million) to fund the construction of a new arena and to invest \$350 million "towards a mixed-use development, on the existing Mellon Arena site, *to revitalize the Lower Hill district.*" [emphasis added] This proposal was not even offered by Barden until the day before the Public Hearings and was a direct response to Isle's plans. Further, to our knowledge, Barden does not have a developer on board, financing in place, a signed commitment for the arena funding, nor any development plans.

The following are illustrations of the types of misstatements, inaccuracies and inconsistencies in the Report. Note that this is not intended as a comprehensive list.

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
Location	Visibility	9 & 56	It is not clear whether visibility is good or bad. It appears they split the apple here, which does not make much sense. They awarded Isle 4/5 for being "not visible from most view corridors" and penalized FCE and Barden for negatively impacting views, but then awarded Isle 2/5 for not being prominently visible from freeways and highways. This criteria is weighted 4.
Location	Physical Access and Impacts	10 & 56	Although viewed by most industry experts as a critical issue, the Planning Department only assigned this a weight of 3. Given the great disparity between the access to the proposed casinos in Station Square and Uptown, the point totals should have been much further apart. The Report also states that Isle's development may impact future plans to connect light rail between Downtown and Oakland. First of all, the light rail system to Oakland may never happen, and if it does, it could just as easily go under Fifth Avenue.

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
Location	Impact on Immediate Surroundings	10 & 57	<p>This criteria as it was applied and the weighting of 5 was designed to give FCE points and guarantee that it comes out on top:</p> <ul style="list-style-type: none"> • What should be a positive for Isle (proximity to the Cultural District, Central Business District and Fifth Avenue commercial corridor) has been turned into a negative. • The fact that the proposed site is considered blighted would generally be a positive feature. • Duquesne University and area schools are mentioned as if they are located next door. • Isle's project is specifically designed to reconnect the Hill District to downtown by redeveloping the Mellon arena site, building a new arena where there now exists an empty hospital and parking lot, and creating a park/walkway over the highways to literally reconnect to the Downtown. However, the Report states "A casino use could further disconnect the lower Hill District from the downtown." • Regarding the claim that existing restaurants will be impacted, this instead is an area in dire need of redevelopment, restaurants, etc.
Location	Ability to Use /Enhance Existing Amenities and Services	11 & 58	<p>Again, a criteria as applied and with weighting of 5 was designed to give FCE points:</p> <ul style="list-style-type: none"> • FCE was given a 4/5 for easy access to downtown and area hotels and amenities, when it has been made clear that access from downtown to Station Square will be extremely difficult. • Isle was only given 2.5/5 for access to downtown hotels when it is a less than 10 minute walk from the Marriott, Doubletree and William Penn, with the Westin and Courtyard not much further. And its access to the Convention Center, Cultural District and Fifth/Smithfield shopping is unmatched by Station Square or Barden.

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
			<ul style="list-style-type: none"> • With respect to potential opportunities the location can spur, Isle should have been the hands down winner, by developing in a blighted arena, adjacent to a new arena and a 28 acre mixed use redevelopment, and its proximity to downtown spurring development there as well. Whereas Station Square is already developed and would simply be adding some more hotel rooms and condominiums and Barden is fairly isolated on the North Shore. Nevertheless, FCE was given 4/5, Isle 2/5 and Barden 2.5/5. • There is also mention that the Isle casino could enhance the regional tourist destination of Mellon Arena, ignoring the fact that the proposal calls for the construction of a new state-of-art arena and a redevelopment where the Mellon arena currently sits.
Location	Current Use	11	<p>Although elsewhere they only focus on Isle's casino plans, in addressing current use, they imply that the site is currently occupied by "surface parking lots, an abandoned hospital building, few private properties, and the Mellon Arena". Actually, the casino site is occupied by private properties and land owned by the Urban Redevelopment Authority ("URA"), which is controlled by the City. Isle has options for the remaining land needed to construct the casino which is not owned by the URA. The Mellon Arena site and surface parking lots are where the proposed redevelopment will occur and the abandoned hospital is owned by the Pittsburgh Penguins and is part of the site where the new arena will be constructed. As a result, Isle was given only 1.5/5 in this category, with a weight of 2.</p>
Operator	Experience operating other Casino facilities	13	<p>Again, another criteria is designed to benefit FCE with a weighting of 6.</p> <ul style="list-style-type: none"> • The description of Harrah's implies that they developed 26 casinos themselves, when in reality, they have acquired most

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
			<p>of their casinos and have only developed a handful themselves; whereas the Report clearly notes that Isle only constructed 6 of its 18 facilities.</p> <ul style="list-style-type: none"> The greatest number of slot machines in a facility operated by Isle is incorrectly stated as 1,598. The number actually is almost 2,000 for Lake Charles, LA.
Operator	Financial Performance	14-15	<ul style="list-style-type: none"> This criteria, with a weighting of 6, is inappropriately applied. The financial performance that is relevant is the owner of a facility, not the manager. Thus, the financial performance of FCE should have been what was considered. FCE's bond rating is no better than that of Isle, but instead, FCE is given a 5/5 based on the credit rating and financial performance of Harrah's as a company. With respect to Isle, the Report states that "a review of Isle of Capri's finances and performance raises questions concerning their ability to deliver on their proposal." That's clearly not what Wall Street is thinking as three significant financial institutions have guaranteed Isle financing for the casino and arena - Credit Suisse, Duetsche Bank and Canadian Imperial Bank of Commerce. The fact that the Planning Department quoted from a reporter's article in which a third party financial report put the odds on Harrah's to win the license rather than either hiring their own financial expert or actually getting a copy of the report shows their inexperience in the financial area. The Report erroneously states that Isle will need to sell other facilities in order to build the proposed casino.
Operator	Labor Relations History	15	<p>Isle was penalized for not employing unionized workers at its existing facilities despite the fact that Isle coincidentally happens to operate in cities which are not unionized, has signed neutrality agreements in its new locations where</p>

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
			<p>there is union activities (including with Unite Here in Pittsburgh) and Unite Here spoke equally in favor of Isle and Harrah's at the Public Hearing. Note that Harrah's also is nonunion in the cities which are not unionized.</p>
Operator	Quality of Existing Facilities	16	<p>Without having actually visited any of the applicants' facilities, the Planning Department seems to come to conclusions about the quality of the applicants' other facilities. They have made this determination relying on photos on the applicants' websites, on the internet, in news articles and obtained by private individuals, and telephone conversations with reporters. This lack of a thorough review is apparent from their comments that Isle's facilities "lack in design and attention to the non-gaming experience" and "focus on attracting visitors for the sole purposes of gaming." Isle's tropical theme and it's signature restaurants clearly demonstrate otherwise. Nevertheless, Isle was given 2/5 and Harrah's was awarded 4/5 with a weighting of 5, which seems to be based on one conversation with a reporter in one city, Kansas City, who stated that the Isle casino was "a 'blue collar' gaming casino" whereas "The Harrah's facility was described as a higher quality designed facility." Note also that some of the photos included on the following pages are inaccurate - the picture of Harrah's Shreveport, LA facility actually a picture of Bossier City, LA and is a picture of the hotel, not the riverboat casino which is a similar casino to Isle's. This was also a facility that Harrah's acquired, rather than developed.</p>
Operator	Track Record in Other Cities	20	<p>The Report states that "Harrah's has not had a great deal of negative press regarding operations in other cities." Our own research (which they could have easily done themselves) shows that in addition to the problems in New Orleans (which although very significant, have been downplayed in the Report), Harrah's has actually had many problems in other cities. With respect to Isle, on the other hand, the Report specifically lists details of two events, with no follow up as with</p>

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
			<p>Harrah's and the impression that there are more. Note that they did not follow up to obtain any further details beyond what they read in the newspapers. For some reason, they have determined that press clippings alone are a sufficient basis for this analysis, and therefore specifically state that they did not consider a video on Isle's website from mayors and officials as far away as England "proclaiming the casinos as assets for the community." Again, another opportunity to set the parameters justify the result they are seeking.</p>
<p>Site Plan and Design</p>	<p>Site-Control</p>	<p>22</p>	<p>Although the text at the beginning of the category clearly states that "This Analysis is performed only on Phase One of the casino development proposals. The analysis does not include any additional phases (if any) or other planned uses and activities", in describing Isle's site and assessing it only a 1/5 in a weighting of 4, they address that some of the parcels are owned by the URA and the SEA, and other parcels by various owners. They also state that a contract is pending that permits the URA parcels to be used by the casino, "but in order for the plans to be implemented Isle of Capri needs to have site control." There are a few significant errors in their analysis.</p> <ul style="list-style-type: none"> • Isle has options for all of the private land under the casino and the URA has publicly committed that regarding the parcels owned by the URA in the casino footprint they will sell the land to Isle if they are awarded the license. • The other URA parcels and SEA parcels relate to the arena and the redevelopment which they stated are not being considered in this section. • Isle does have site control and the rest is in the City's control, The same Planning Department has been formally requested to process Isle's Master Development Plan which has been delayed by the Planning Department for months. • Although they mention Isle's temporary

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
			<p>facility as a problem (query if that should be considered an additional phase and not addressed), nothing is mentioned about Barden's proposed temporary facility on the river, for which he has no approvals and may not be legal under the Gaming Law or zoning ordinances. That being said, Barden received a 5/5.</p>
Site Plan	Visual Access	23	<p>This seems to have been addressed earlier under Location. Same question as above, is visibility good or bad. Apparently here it is good, with a weighting of 3. Note also the different tone of descriptions. FCE is "nestled between the Mt. Washington hillside and the Monongahela River", whereas Isle is "part of the downtown fringe". In addition, it is stated that the Isle casino would "be distinct from the neighboring buildings in terms of scale, materials and visual appeal." This, of course, does not take into consideration the new arena, redevelopment, the Washington Plaza Apartments, etc. In addition, are they saying they prefer the look of what they earlier described as a "blighted area"?</p>
Site Plan	Accessibility	23	<p>Another repeated criteria, and as stated earlier, essential to the success of a casino. Nonetheless, they assigned it a weighting of 2 and not only scored the three applicants lower than last time (1.8, 2.0 and 1.5 here, v. 2.8, 3.6 and 3.4 earlier), they also have the three very close together when there is clearly a significant difference between the access to Station Square vs. Uptown. How many people arrive on bikes to a casino??</p>
Site Plan	Integration with Amenities	24	<p>Again, a repeat. This one with a weighting of 3. They again mention that Harrah's will not have as many restaurants that will allow Station Square restaurants to capture some business. There are two fallacies here: first, FCE, like any casino or destination venue (i.e., stadiums), wants to keep the customers and their money inside the building; second, FCE also controls all of the leases of the Station Square restaurants and will participate in percentage rents in those</p>

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
			<p>business. So, in effect, the FCE casino and Station Square will operate as one business capturing all of the buying power of the casino visitors the detriment of downtown Pittsburgh. The synergy of Isle's casino with the new arena and with Downtown completely escapes the analysis in this section. They also don't seem to understand Isle's plans which make it clear that one can enter the casino and shops directly from Fifth Avenue. For Isle to have received a 2.2/5 in this criteria and FCE a 4/5 defies understanding.</p>
Site Plan	Phased Expansion of Gaming and Non-gaming Uses	24	<p>If the new arena and redevelopment were considered, Isle would have won this criteria hands down.</p>
Site Plan	Existing Structures	25	<p>Isle is being criticized for demolishing a vacant hospital structure, a church and other surface parking lots. First of all, the hospital is under the proposed arena and shouldn't be considered here, but nevertheless, the hospital went bankrupt and no alternative use has ever surfaced. The church is next to the proposed arena and will be preserved. It has nothing to do with the casino. Actually, it is clearly visible in the plans submitted to the Planning Department. The surface parking would be utilized for the temporary facility and then the redevelopment, but parking structures will be built. Note that no points were given to Isle for demolishing and replacing the obsolete Mellon arena.</p>
Site Plan	New Public Amenities and Infrastructure	26	<p>This is a criteria where the full project is and should be included. Although the arena is addressed for the Isle, there is no mention of the proposed redevelopment (although it is mentioned for Barden, with the \$350 million price tag). As a result, there's no mention of the new parks, plazas and the walkway/park over the Crosstown Expressway. And this criteria is only weighted 3.</p>

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
Site Plan	Landscaping	26	Again, Isle is not given credit for the plans for its proposed redevelopment, which would include new parks, plazas and the "lid" over the Crosstown Expressway.
Building Design	Compliance with Zoning Code	27	Apparently being located along the river is an important criterion for a land based casino as half of the points in this category were tied to the connectivity to the riverfront.
Building Design	Site Context	28	This criteria is weighted 4, with FCE getting a score of 4/5 and Isle a 1/5. Isle was penalized for the scale of its building. However, both the casino and arena have four story facades on Fifth Avenue, with the larger bulk of the buildings set back from the street. They stated that a 12 to 14 story building is inconsistent with the neighborhood, and yet Washington Plaza Apartments are right next door to the east and starting one block away to the south are parking garages and buildings of Mercy Hospital and Duquesne University. Also, the towers of Chatham Center are one block to the west.
Building Design	Non-Gaming Uses and Public Spaces	28	Another repeat criteria, with a weighting of 3, whereby they penalize Isle for having restaurants and bars in the facility. They also again do not give Isle credit for all of the parks, discount the retail outlets on Fifth Avenue by stating that they "are proposed but would be market driven in terms of leasing", or erroneously claim that there will not be public access to the atrium. FCE again seems to benefit from not taking business away from the Station Square businesses.
Building Design	Design Team	31 & 69	First of all, the averages and weighted scores are wrong. Based upon the sub-criteria on page 69, the average scores should be 2.2, 2.6 and 1.6 for FCE, Isle and Barden, respectively, with weighted scores of 4.4, 5.2 and 3.2. Also, UDA, which has a broad national and international reputation, preminent in urban design and the firm picked by the City for its Fifth and Forbes development, was simply described in the Report as "very active in the planning of this area and the

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
			<p>neighboring residential community," while FCE's urban planner was described as "pioneers in mixed-use design and development. They are highly reputed firm worldwide." Also, for some reason, FCE and Isle were only given a 1/5 for design of the building by an architect, when they both used premier architects.</p>
Socioeconomic	Maximizes job creation and ensures jobs are quality jobs	34	<p>It is hard to understand why FCE got a .5 more than Isle when the introduction to this criteria states that the Planning Department "is of the opinion that total employment and wages would not vary greatly between the three casinos" and then further states that FCE's "employment figures are most likely inflated and higher than employment at two existing Harrah's Atlantic City casinos that are of comparable size", and it should be noted, have table games which are more job intensive.</p>
Socioeconomic	Potential to leverage additional development in the City of Pittsburgh	35	<p>This is a situation where the category favors Isle, which attained a top score of 5/5, but the weighting was unnecessarily low at 3/5 for an important economic development criteria. This category should have been a windfall for Isle, with the new multi-purpose arena next door and the at least \$350 million development with Nationwide Realty planned for the Mellon Arena site. Isle's plan involves the redevelopment of underused land, to say nothing about putting the land back on the tax rolls.</p>
Socioeconomic	Maximizes ability to market to suburban and overnight visitor gamers	37	<p>Despite various experts criticizing the access to Station Square and parking availability, the Report give FCE a 5/5 in this criteria and states that it is "accessible by foot from existing downtown hotels" and "is accessible from regional highways leading to the suburbs and has ample parking". The Report also naively relies on Harrah's claims to market the FCE casino as a destination casino, using its Total Rewards loyalty program to bring visitors from all over the world to Pittsburgh. This theory has been discredited by many experts who claim that Harrah's will actually use the casino to send gamers to Las Vegas and Atlantic City which have lower tax rates and which also have</p>

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
			table games. With regard to Isle, in order to discount the benefit of the new arena, the Report incorrectly states that Isle's proposal "does not guarantee that the new arena will be constructed." Isle has contractually committed to pay \$290 million within 90 days of obtaining the license so that the City can build the arena. Are they now requiring that Isle build it itself?
Socioeconomic	Promotes visitor spending off casino floor and outside casino walls	38	The third time this criteria is used, with a weighting of 3 this time and a score of 5/5 for FCE. With regard to Isle, again they misstate the access to the casino from Fifth Avenue and the retail establishments which will be located on such street. They also again attempt to downplay the proposed redevelopment and treat it as being dependent on market conditions, which has never been claimed.
Socioeconomic	Complements convention, tourism, hotel, retail and restaurant activity	38	This is the fourth time FCE is rewarded for proposing a casino in the existing Station Square complex and Isle is penalized for the so called, "closed design." Also, the statement that "because Isle of Capri is more of a local than national draw, its contribution to hotel activity in the City would be limited" is simply a gratuitous statement intended to again emphasize Harrah's absurd claims that they will bring in tourists from around the world to Pittsburgh to play slot machines (they used Spain as their example at the Public Hearings). Isle's proximity to Downtown, together with the arena next door and the convention center two blocks away, should have made it a shoe-in for this section.
Socioeconomic	Has received positive feedback from community	39	Even though Isle public sentiment is overwhelmingly in favor of Isle's proposal, as evidenced by polls run by the local papers and TV stations, and significantly more supporters having spoken in favor of its plan at the Public Hearing, Isle was given a 3/5, the same as FCE, in the criteria based on two parties who have two groups - the Uptown Action Coalition which has not taken a formal stance on the issue and

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
			Duquesne University which has stated that it would prefer to not have a casino close to its students (note that Station Square is not much further away). Note also that 80 elected officials have come out in favor of Isle's proposal (including State Senators and Representatives, City Council members and others); none have come out in favor of the other two applicants.
Socioeconomic	Proposal is integrated into existing neighborhood plans	40	The same Planning Board that has refused to process Isle's Master Development Plan for months has now given it 0 points for not having a plan for the site. Go figure! Isle has prepared a detailed master plan with diagrams, analysis and designs that are compatible with Crawford Square, the Hill District and Uptown. FCE, on the other hand, got 3 points simply because something already exists for Station Square, although one would assume it does not address the casino.
Socioeconomic	Plan to fund programs and/or a special service district to aid nearby communities	40	FCE is give credit for donating \$25 million to the Pittsburgh History & Landmarks Foundation, but actually that is not voluntary, but rather a contractual commitment from when they acquired the Station Square property over 10 years earlier. Also, FCE's \$1 million annual contribution is for projects city-wide, whereas Isle is proposing its funds go to the Hill District. The Report again throws in the gratuitous statement about the Isle/Nationwide redevelopment "should the development be constructed."
Socioeconomic	Community relations liaison and plan, with adequate resources to interface with neighbors	41	FCE got a 5/5 because it "plans on employing a community relations liaison" [emphasis added], whereas Isle received a 4/5, even though it has an established Pittsburgh First team, with a staff, a Board of Advisors, and an office in the Hill. Isle is apparently being held to a higher standard, as it is being expected to have "released a plan for interactions with the surrounding community once the casino has received a license", but it is satisfactory for FCE to simply plan on employing a liaison.

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
Traffic and Parking	Convenient Local Access by Car	46	<p>FCE scored a 2.4/5 here, to Isle's 3.2/5, when various traffic experts have stated that access to Station Square by car will be a mess. Even the Report states that "direct access to the site would be limited to a single arterial street" and "There are limited opportunities to further mitigate congestion", whereas regarding Isle they state that the site "has many local road with sufficient or excess capacity".</p>
Traffic and Parking	Access by Public Transit	47	<p>Isle is penalized for the Planning Department's lack of understanding of traffic reports and only assessed 1.8/5:</p> <ul style="list-style-type: none"> • The Report states that there is no public access between Fifth and Forbes/Bedford Avenue. Currently there is no demand for such a connection, but some of the existing bus routes can be modified to include that connection if desirable and demand exists. • The Report claims that there are too many bus routes on Fifth Avenue. Isle's traffic report does not propose any additional routes, so the congestion impact change due to buses should not be significant. • The Report states that the additional buses would result in unsafe conditions for pedestrians. However, Isle has proposed traffic signal upgrades with enhanced and/or new pedestrian signal equipment, including appropriate signage and paint marking upgrades. As a result, pedestrian safety conditions will be BETTER than existing conditions, not worse. • The Report says that truck access on Fifth Avenue will add to congestion and increase conflicts and accident potential. This is incorrect. The proposed plans have the operations accessed via a controlled, signalized intersection, with all loading/unloading off street on the property. This will decrease, not increase, accident potential.

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
Traffic and Parking	Casino must be accessible to pedestrians	47	The Report claims that there will be more conflicts between pedestrians and vehicles at the Isle site. Actually, Isle will provide new and/or enhanced traffic signals, pedestrian signal equipment, signs and paint markings that will coordinate with pedestrian access points into the proposed development. This should improve upon the existing situation.
Traffic and Parking	Casino must provide adequate parking on or adjacent to the site	48	The introduction to this category states that each of the applicants' traffic and parking is to be assessed based on 5,000 slots. However, with respect to Barden the Report states that his estimate of parking demand of 4,186 spaces is comparable to industry standards. But regarding Isle, the Report states that its 4,301 space garage is not sufficient since "industry estimates put parking demand for a 5,000 space casino at 5,000 to 7,000 spaces." The real question should be what is the industry standard and then all three applicants should be held to it equally since they are all being assessed based on 5,000 slots. Of the three, Isle will have the most spots in its parking lot. FCE is only planning for 3,100 new parking spots. The Report also states that Isle patrons will infiltrate free parking in Crawford Square an the Hill District during Friday and Saturday night peaks. This can be dealt with by using the City's well-established Residential Permit Parking Program and increasing the hours/days it is enforce or decreasing the grace period.
Traffic and Parking	Minimize the potential for traffic congestion	50	A similar criteria as covered above, and again, Isle should have run away with this criteria, but was only assessed 3/5, where the weighting is 4.
Traffic and Parking	Appendix C		Almost as an aside Isle is given credit for submitting the only comprehensive study. FCE and Barden are given a pass and permitted to submit theirs later, if they win the license. How then did the Planning department believe that they could give any credence to the claims of FCE and Barden with no back up? Both of these

EVALUATION CATEGORY	CRITERIA	PAGE	INACCURACY/INCONSISTENCY
			applicants should have been given average scores of 0/5 for accessibility. Practically all of the analysis of FCE and Barden's traffic and parking was the opinion of the Planning Board staff themselves.

As stated earlier, the selection of criteria in each category, and the system for assessing points and weighting for each criteria was done subjectively, as was evidenced in the examples above. However, when looking at the criteria categories alone, Isle actually tied FCE in terms of the number of categories it had the highest score. It should be noted that in the criteria in which Isle came out ahead, the average scores were very close, whereas regarding the criteria in which the Planning Board deemed FCE to be stronger, the differences in points were much greater. All of this emphasizes that the subjective scoring and weighting and repetition of the criteria which favored FCE which helped them come out with the higher score.

	<u>Criteria Total</u>	<u>FCE</u>	<u>Isle</u>	<u>Barden</u>
Location	6	2	3	1
Operators	4	4	0	0
Site Plan*	10	4	6	2
Building Design**	12	6	8	1
Socioeconomic*	14	11	4	1
Traffic and Parking	7	0	6	1
TOTAL	53	27	27	6

* Two ties

** Three ties

***One tie

Conclusion

As is clearly evident in the examples highlighted above, the Report is filled with inconsistencies, misstatements, inaccuracies, self-serving statements and manipulations of the facts, criteria and weighting to achieve a desired outcome. The Report is nothing more than a subjective analysis of self-reported material and Planning Board impressions (who clearly are not experts in this type of analysis), rather than an objective analysis based on research and balanced criteria.