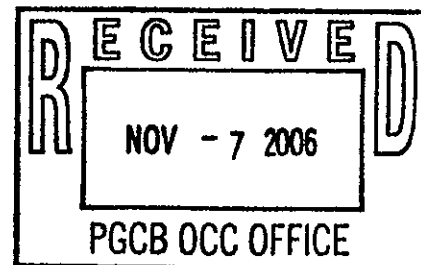




November 6, 2006

Frank T. Donaghue, Esquire, Chief Counsel
Office of Enforcement Counsel
Pennsylvania Gaming Control Board
303 Walnut Street/ Strawberry Square
Verizon Tower
Harrisburg, PA 17101-1825



Re: Pennsylvania Gaming Control Board
SugarHouse Casino TIS Review

Dear Mr. Donaghue:

We are in receipt of Edwards and Kelcey's comments to our Traffic Impact Study, dated October 13, 2006 for the SugarHouse Casino contained in a letter to Pennsylvania Department of Transportation dated November 1, 2006. The following are our responses to those comments organized by item number for easy cross-reference.

Introduction

1. The description of the phased program is basically accurate except that Phase I will include a ballroom which may be used for special events. There is not a separate performance venue.
2. Correct.

Trip Generation

3. As stated in our report, the analysis was based on full build-out of Waterfront Square. The team is aware of numerous development proposals for additional development in the vicinity. Other development is accounted for in the 1% per year growth rate for background traffic as we have no way of knowing which of the many developments under consideration will actually be built. In the end market forces and community interest will dictate what other development

occurs. To make any assumption about which actual proposals might actually prevail would be entirely speculative at this planning phase.

4. The traffic analysis submitted in October 2006 is based on more detailed information about the SugarHouse Casino customers. Access to the site is split functionally with valet parkers and taxis entering at Frankford Avenue to access the porte cochere and self parkers entering at Shackamaxon Street for easy access to the self-park garage.

Future Conditions Analysis and Mitigation

5. The Phase II analysis was based on the assumption that the new Girard Avenue/I-95 ramps would be in service by the time Phase II is operational. This is based on the best information available at this time as to when both are likely to be completed. The SugarHouse Casino team will work with PennDOT and the community to minimize and mitigate impacts of future casino expansion which, in turn, will be guided by market demand and gaming control board authorization to increase the number of gaming devices.

Similarly, we will work with PennDOT and the community during the construction of the interchange to mitigate any potential impacts and minimize official or "unofficial" detours through the neighborhoods.

6. The October 2006 Traffic Impact Study analyzed the intersections which were most likely to have the greatest impacts to ensure that traffic could be handled without causing major traffic problems. In the next phase of study further intersections will be included. The list of additional intersections will be determined through discussions with PennDOT and the neighborhoods.

7. The trolley line is not expected to have a major impact, but will be investigated in the next phase of the project.

8. The Delaware Avenue and Penn Street intersection geometry and Penn Street roadway width will be evaluated with respect to truck/bus movements in the next phase. On street parking will not be impacted by the SugarHouse as adequate free parking is provided on site for customers and employees.

The current SugarHouse traffic analysis is based on the assumption that a small percentage of customers familiar with the site will likely use Penn Street when arriving from south of the site. The analysis also assumes that in Phase II a maximum of 4 casino buses will enter the site via Penn Street during the peak hour. This was incorrectly illustrated on the trip distribution figures. The total casino-bound volume traveling along Penn Street during the peak hour studied is estimated to be 15, 30, and 20 vehicles during the Interim Phase, Phase I and Phase II, respectively.

Signal timing plans were adjusted to create an improved LOS.

9. Correct. There is no northeastbound Delaware Avenue left-turn lane to Shackamaxon Street.

10. The Synchro analysis does account for Laurel Street and its proximity to Delaware Avenue. Few vehicles use Laurel Street, approximately one per signal phase, so it is not expected that vehicles will be impeded from exiting Laurel Street.

11. This is a typographic error. The phrase should read "eastbound Girard Avenue".

12.a. Through movement to the casino site from Shackamaxon Street should be denied through signage and enforcement. In the next phase discussions with the Shackamaxon Street residents will determine whether traffic calming is a desired approach for this street, and whether left turns to Delaware Avenue should also be restricted. For example, if the community would accept no left turns on Delaware Avenue, a physical restriction could be placed at the intersection, eliminating all possibility of through traffic into the casino site.

12.b. In the next phase of the project this more detailed analysis will be part of the next phase.

13.a. Phase I improvements will be coordinated with PennDOT's maintenance of traffic planning as those plans are developed.

14.a. This will be addressed in the next phase of the project.

14.b. This will be addressed in the next phase of the project.

14.c. This will be addressed in the next phase of the project.

15. The through movement geometries are correctly coded in the modeling software. However, due to the limitations of the software, they are labeled as left-turn and right-turn movements. When the SimTraffic simulation is run for the model, southbound through Frankford Avenue vehicles coded as "left-turns" in the model are shown to correctly travel through to the casino driveway. SimTraffic also shows that through casino driveway vehicles traveling to Frankford Avenue and coded as "right-turns" in the model are shown to correctly travel through to Frankford Avenue.

16. Queue lengths were generated by the Synchro model. The output will be provided to all addressees of this letter later this week.

17. Wayfinding signage and traffic signs will be developed as part of the next phase.

Other Comments

18. A safety analysis will be included in the next phase.

19. The SugarHouse Casino team has already entered into discussions with the owner of this property regarding how to provide future access to the site.

20. Emergency responders will be included as stakeholders in the detailed discussions of design and traffic calming measures.

Conclusions

We concur that all the elements outlined in the bullet points should be addressed as plans are further refined and developed in the next phase of the project.

The traffic analysis that has been conducted to date indicates that the traffic generated by the SugarHouse Casino can be accommodated on the surrounding roadway system with some improvements and modifications as detailed in the report. The intersections that have been analyzed so far are those which will be most affected by the proposed new development. Further studies will be carried out to ensure that all other impacts are recognized and mitigated.

The HSP Gaming Team intends to work closely with PennDOT and neighborhood groups on all future traffic planning and design phases for this project. Together we will mitigate the impacts of traffic in the surrounding area.

Please let me know if you need additional clarification or we can be of further assistance.

Yours truly,



Susan F. Gibbons, RA, AICP
Vice President

Cc: Mr. Glenn Rowe, PE, PennDOT
Mr. Stephen E. Cunningham, PE, Edwards and Kelcey