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November 1, 2006

Mr. Glenn Rowe, P.E.
Pennsylvania Department of Transportation
Bureau of Highway Safety and Traffic Engineering
Commonwealth Keystone Building
400 North Street, 6th Floor
Harrisburg, PA 17064

RE: Pennsylvania Gaming Control Board
Trump Casino TIS Review
PennDOT Agreement E00229, Work Order 14
EK Project No. 040015.038

Dear Mr. Rowe:

In accordance with Agreement E00229, Work Order 14, Edwards and Kelcey has completed its review of the Traffic Impact Study (TIS) for Trump Casino at the former Budd Plant site in the City of Philadelphia, prepared in December 2005 and revised in October 2006 by Vollmer Associates. Our review considered the applicant's completeness in meeting the standards set forth by PennDOT and the Institute of Transportation Engineers (ITE), as well as the completeness and reasonableness of their assumptions, calculations, findings, and conclusions.

Following are our comments and findings based on the site visit and the review of the above-referenced study:

Approach

1. The study is for a gaming facility proposed to be located at the former Budd Plant site in the City of Philadelphia. A temporary casino is proposed to be opened with 1,500 slots and limited food and beverage services by the end of 2007 (within 12 months of obtaining the casino license). The first phase of the development includes 3,000 slot machines, 1,200 seats of restaurant/bar uses, a 3-screen, 450 seat movie theatre, 11,000 sq. ft. special events area, and 7,500 sq. ft. retail development. The final phase of the development includes a performance hall with a seating capacity of 400 people, a 400-room hotel and an additional 2,000 slot machines.

The earlier report dated December 2005 indicated a school having 300 students and 30 teachers as part of the final phase of development, but it has been removed in the revised report dated October 2006.

Data Collected

2. An excellent description of the available transit service was provided, including routes, destinations and headways. A ten percent credit was taken, assuming that ten percent of employees and visitors would use transit. The report does not mention whether pedestrian travel between the transit stops and casino is safe and accessible.

Trip Generation

3. New trip generation data was presented in the revised study. Data was collected at a similar facility and expanded upon with ITE Trip Generation data. Assumptions were made conservatively and the procedures were well-documented. The resulting data was found to be acceptable.

Mitigation Measures

4. Under existing conditions, Fox Street in the vicinity of the Site Drive has sidewalks that are in poor condition. Discussion should be presented detailing the proposed pedestrian facility upgrades through the project area, including repair/replacement of sidewalks on Fox Street, and installation of sidewalks along Roberts Avenue. Figure 1 and 2 show Fox Street and Roberts Avenue near the site accesses.



Figure 1: Poor condition of sidewalk on Fox Street near site access



Figure 2: No sidewalk along Roberts Avenue near site access

5. At the intersection of Fox Street and the proposed site access, widening along Fox Street may require overhead utility relocations as the existing utility poles are at the back of the curb (see Figure 1).
6. At the intersection of Roberts Ave. and Fox St., planned improvements include an added right-turn lane on the westbound approach, and a second lane on the northbound approach. It appears that the lane additions will be accomplished within the existing curblines by modifying existing pavement markings. The proposed lane widths are approximately 10'. Discussion should be presented detailing the acceptability of the 10' lane widths with the City of Philadelphia. Additionally, the turning radii at this intersection may not be sufficient for the anticipated tour bus and delivery vehicle traffic. These issues should be addressed during the final design of the proposed improvements. Figure 3 shows the westbound Robert Avenue approach at the intersection of Robert Avenue and Fox Street.



Figure 3: Westbound Roberts Ave. at the intersection of Roberts Ave. and Fox Street

7. At the intersection of Roberts Ave. and the proposed site access, widening of Roberts Avenue may be difficult due to the existing retaining wall on one side and the Philadelphia Second Alarmers fire station on the other (shown in Figures 4 and 5). A deficient sight distance at the proposed site driveway was noted for the southbound Roberts Avenue approach. The sight distance should be investigated further during final design of the roadway improvements.
8. The location of the new Route 1 southbound off-ramp may necessitate retaining walls on the existing side slopes of Route 1 southbound. This improvement may require acquisition of right-of-way to be constructed.



Figure 4: Roberts Ave. near site access – Philadelphia Second Alarmers Fire Station



Figure 5: Roberts Ave. near site access – Retaining Wall

9. Vertical/horizontal geometry and necessary vertical clearances for the proposed improvements for Stokley Street off-ramp should be checked. Based on field observations, it seems as if Abbotsford Avenue profile would need to rise and fall within a short distance in order for the Stokley Street off-ramp to meet existing grades near the private drive on Stokley Street. It should be verified by the designer that these improvements can be accommodated utilizing standard PennDOT highway design criteria.

Additionally, construction of this off-ramp will require acquisition of right-of-way from the property at the corner of Abbotsford Avenue and Stokley Street (currently occupied by the Philadelphia Water Department).

Other Comments

10. At certain intersections, safety deficiencies are mentioned. However, no crash data was analyzed and presented. It is anticipated that the safety concerns will be addressed during the final design phase.

CONCLUSIONS

EK reviewed the Traffic Impact Study (TIS) for Trump Hotel and Casino Resorts, which was completed in December 2005 and revised in October 2006 by Vollmer Associates. The study analyzed the impact of a gaming facility which is proposed to be developed in two stages. A temporary casino is proposed to be opened with 1,500 slots and limited food and beverage services by the end of 2007 (within 12 months of obtaining the casino license). The first phase of the development includes 3,000 slot machines, 1,200 seats of restaurant/bar uses, a 3-screen, 450 seat movie theatre, 11,000 sq. ft. special events area, and 7,500 sq. ft. retail development. The final phase of the development includes a performance hall with a seating capacity of 400 people, a 400-room hotel and an additional 2,000 slot machines. The site is located at the existing Tasty Baking Company's corporate headquarters and distribution center, which is located on the southwest corner of the intersection of Roberts Avenue and Fox Street in the City of Philadelphia, Philadelphia County, PA.

The applicant has provided new information in the revised study and incorporated most of the comments provided by EK in the preliminary review letter dated September 11, 2006. The review staff of Edwards and Kelcey agrees that most of the issues that can be addressed at this stage of planning have, in fact, been addressed systematically and thoroughly. As the plans are further refined and developed, the designers should:

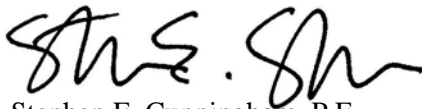
- Review recent traffic accident statistics to determine the need for any safety measures.
- Be prepared to making operational adjustments to adapt to changing conditions.
- Resolve geometric design details.
- Initiate early coordination with utility agencies and companies regarding relocation needs associated with street and intersection improvements.
- Integrate public bus operations and stops with the roadway and site design.



- Ensure that vehicles entering the parking facility will not backup into public streets due to internal congestion.
- Develop a comprehensive signage system in coordination with other nearby destinations.
- Ensure compliance with all ADA requirements throughout the improvement areas.

This summarizes our comments related to the Traffic Impact Study for Trump Casino at the former Budd Plant site in the City of Philadelphia. We will be happy to further discuss any of these issues with you or your staff, or meet to clarify or elaborate on any of our findings. Please let me know if we can be of further assistance.

Very truly yours,



Stephen E. Cunningham, P.E.
Project Manager

SEC/jp

cc: Paul Resch, Acting Secretary, Pennsylvania Gaming Control Board
Devang Patel, P.E., Pennsylvania Department of Transportation
Richard Sesny, Pennsylvania Department of Transportation
EK Project Team

