



PENNONI ASSOCIATES INC.
CONSULTING ENGINEERS

PINN 0603

November 9, 2006

Frank T. Donaghue
Chief Counsel
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106-9060

**RE: PINNACLE ENTERTAINMENT PROJECT
TRAFFIC IMPACT STUDY REVIEW
Philadelphia, Pennsylvania**

Dear Mr. Donaghue:

We are in receipt of your letter dated November 2, 2006, regarding the independent Traffic Engineer's review of our "Pinnacle Delaware Riverfront Site Traffic Impact Study", as prepared October 11, 2006 for Pinnacle Entertainment.

On behalf of Pinnacle Entertainment we would like to take this opportunity to address the comments identified in the attached independent Traffic Engineer's report as prepared by Edwards and Kelcey on November 1, 2006.

The comments outlined in the independent Traffic Engineer's report as prepared by Edwards and Kelcey are addressed as follows:

1. In response to Comment # 1: The summary of the facilities proposed under the Temporary Casino and Phase 1 Pinnacle Entertainment Project as described in the Edwards & Kelcey report is correct.
2. In response to Comment # 2: We will comply with the request to project traffic volumes ten (10) years beyond the opening year of the casino both with and without the development. This work is in progress and we will provide the analysis as soon as it is completed.
3. In response to Comment # 3: No response necessary. As stated the existing conditions including lane geometry, pavement markings, bike lanes, pedestrian crossings and trolley lines have been adequately described.
4. In response to Comment # 4: No response necessary. As stated, safety concerns have been identified in the study.
5. In response to Comment # 5: Manual turning movement counts were not conducted during the Saturday peak hours. The Saturday peak hour turning movement volumes were derived from the weekday evening turning movement counts by applying an adjustment factor obtained from comparing the Saturday ATR counts to the weekday PM turning movement counts. We will clarify this matter in our revised study.
6. In response to Comment # 6: We will provide the calculations for obtaining the trip generation rates per gaming unit as requested. In addition, we will provide additional information on the percentage of the trip generation used for the associated facilities.

7. In response to Comment # 7: The Delaware Park traffic count was conducted in January 2003 and no seasonal adjustment factor was applied. According to the referenced Box & Bunte article, January is a typical gaming month and this was used for estimating our trip generation rates.

8. In response to Comment # 8: We will provide calculations for the 2007 and 2011 pre- and post-development scenarios with the trip generation and distribution summary provided in Appendix C.

9. In response to Comment # 9: Although the comment agreed that the trip generation and distribution summary was generally acceptable, we will revise the legend for Figures 9A & 9B to specify the time period that the percentages outside and inside the parenthesis represent.

10. In response to Comment # 10: We have taken a conservative approach with regard to applying a modal split (i.e. a reduction for patrons arriving via public transit, casino bus or by walking) for the site that would in effect reduce our projected traffic volumes generated by the site. The rationale for this approach is as follows:

- The nearest residential properties are located over 1,000 feet from the permanent gaming facility and there are limited residential properties within a ½ mile of the site. For this reason, we believe that there will be a very limited number of pedestrian patrons that access the site, although we will be providing pedestrian facilities in conjunction with the site.
- As the project progresses, we will work with the Southeastern Pennsylvania Transportation Authority (SEPTA) to integrate bus operations and stops with the site design, with the intention of having some SEPTA bus routes terminate at the site, thereby reducing pedestrian traffic.
- Based on discussions with Pinnacle Entertainment, limited casino bus traffic is anticipated.

As the project progresses we will work to refine the design of the signalized intersections to accommodate both vehicular and pedestrian traffic in an efficient and safe manner.

11. In response to Comment # 11: Since the traffic pattern in the study area will be affected by the completion of the Girard Avenue Interchange Project, we will identify mitigation measures for two different scenarios, namely both before and after the completion of the Girard Avenue Interchange Project. We will also more fully evaluate the traffic impacts between the 2009 and 2012 years.

12. In response to Comment #12: The Waterfront Square Condominium Development comprises a total of 780 residential units and is located on the Delaware River Waterfront at Penn and Poplar Streets, which is about ¾ mile south of the proposed Pinnacle Entertainment Project Site. For the purpose of achieving a conservative analysis we have assumed that 50% of the total trips generated by this development during the analyzed peak hours will utilize the Delaware Avenue, Richmond Street and Aramingo Avenue intersections included in our study area. The basis of this assumption is that 50% of the total trips from the Waterfront Square Development will originate or be destined for points south of the Waterfront Square Development which is outside of our study area and away from the Pinnacle site. The remaining 50% of the total trips from the Waterfront Square Development have been applied to the Delaware Avenue intersections included in our study area and 25% have been applied to the Richmond Street and Aramingo Avenue intersections included in our study area. We believe that this is conservative since in actuality the traffic from Waterfront Square will disperse as it moves away from the Waterfront Square site. The additional trips contributed by this development were calculated utilizing the rates provided by the Trip Generation by the Institute of Transportation Engineers. It should also be noted that we utilized the most conservative land use for this development (i.e. townhouse/condominium) and we did not take any transit reduction, thus yielding a conservative analysis.

13. In response to Comment # 13: Although we have provided Level of Service Summary Tables After the Recommended Improvements in Appendix G, we will also provide the Synchro analysis reports incorporating the recommended improvements.
14. In response to Comment # 14: We will provide the Corsim analysis reports for review.
15. In response to Comment # 15: Regarding the Synchro Analysis:
 - We will correct the minor discrepancy in the turning movement volumes at the intersection of Columbia Avenue and Delaware Avenue in Figures 2A and 2B and Synchro files to match the traffic counts in Appendix B.
 - Upon review of the turning movement counts for Belgrade Street, we believe that they are correct in Figures 2A and 2B and in the Synchro files as compared to the traffic counts presented in Appendix B. The orientation of the traffic count data as presented in Appendix B is limited by the software and does not reflect the actual intersection configuration.
 - We will correct the discrepancy in the lane configuration for eastbound Richmond Street at Dyott Street in Synchro.
16. In response to Comment # 16: A traffic signal warrant analysis for the recommended new traffic signal at the intersection of Richmond Street and Dyott Street will be provided for review.
17. In response to Comment # 17: Since the traffic pattern in the study area will be affected by the completion of the Girard Avenue Interchange Project, we will identify mitigation measures for two different scenarios, namely both before and after the completion of the Girard Avenue Interchange Project. We will also more fully evaluate the traffic impacts between the 2009 and 2012 years.
18. In response to Comment # 18: Prior to the construction of the new Girard Avenue Interchange Project the trips generated by the proposed Pinnacle Entertainment Project coming from and going to Southbound I-95 will temporarily need to follow a circuitous route on arterial streets before reaching the site or the interstate as shown in Figure 1D-1 in our study. We agree that adequate directional signs should be provided to facilitate access and minimize the impact to the local community and this mitigation measure will be added to our study recommendations.
19. In response to Comment # 19: We will provide a conceptual plan showing the proposed improvements at the intersection of Aramingo Avenue and Cumberland Street. The recommended three lane cross-section on the eastbound Cumberland Street approach to the intersection can be implemented within the existing 34-foot curb to curb width of the street without any physical widening or additional right-of-way.
20. In response to Comment # 20: We will amend our study to include a discussion of how special event traffic (such as opening day traffic) will be handled. Although this particular item is subject to refinement based on subsequent detailed discussions with the involved public agencies and community groups, it is anticipated that special events will be closely coordinated with the involved public agencies including PennDOT, the City of Philadelphia Managing Director's Office, the Philadelphia Streets Department and the Philadelphia Police Department as well as the involved community civic groups. Such measures as the possible use of PennDOT's variable message signs on I-95 to help direct special event traffic as well as the use of traffic control officers at key locations will be explored. In general we anticipate that a specific traffic management plan would be developed for the special events in conjunction with the involved parties. In addition, we recommend that a protocol be established for such events with the involved parties that would include a de-briefing after each special event so that the effectiveness of the traffic management plan can be assessed and refined as needed.


As the project and plans are further refined and developed, we will comply with the following suggestions as identified in the November 1, 2006 review letter:

- Review recent traffic accident statistics to determine the need for safety measures.
- We will be prepared to make operational traffic adjustments to adapt to changing conditions.
- We will resolve geometric design details.
- We will initiate early coordination with the involved utility agencies regarding relocation needs associated with street and intersection improvements, and in fact we have already initiated such discussions relative to overall site design issues involving the utility agencies.
- We will work with the Southeastern Pennsylvania Transportation Authority (SEPTA) to integrate bus operations and stops with the roadway and site design.
- We will take appropriate design and operations measures so that vehicles entering the parking garage will not backup into public streets due to internal congestion.
- We will also develop a comprehensive signage system for the area in coordination with other nearby destinations.
- We will comply with ADA requirements throughout the improvement areas.

We trust that this information is helpful and we look forward to working with the Commission as this project is further developed. We will forward the requested additional information as soon as it is available. If you have any questions or comments relative to the content of this letter or the Traffic Impact Study for the Pinnacle Entertainment Project, please do not hesitate to contact me at 215-222-3000, extension 3203.

Very truly yours,

PENNONI ASSOCIATES INC.



Harry E. Laspee, P.E.
Chief Engineer

Encl.

cc: Mr. Alex J. Stolyar, Director of Corporate Development, Pinnacle Entertainment
Mr. Glen Rowe, P.E., Pennsylvania Department of Transportation
Mr. Patrick B. Mulligan, Philadelphia Gaming Advisory Task Force
Mr. Stephen E. Cunningham, P.E., Edwards & Kelcey
Mr. Andrew J. Giorgione, Esq., Buchanan Ingersoll & Rooney, PC
Mr. Brian A. Casal, Esq., Buchanan Ingersoll & Rooney, PC