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File #07251-01

November 7, 2006

**VIA E-MAIL AND FEDERAL EXPRESS**

Mickey Kane, Clerk  
Pennsylvania Gaming Control Board  
5<sup>th</sup> Floor, Verizon Tower, Strawberry Square  
303 Walnut Street  
Harrisburg, PA 17101

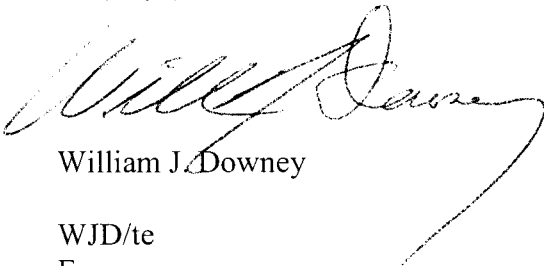
Re: Riverwalk Casino, LP Category 2 License Application  
Docket No. 1362

Dear Ms. Kane:

In connection with the referenced application, enclosed please an five (5) copies the response of the Applicant's traffic engineer, Pennoni Consulting Engineers, to the final report of the PGCB's engineering firm, Edwards & Kelcey.

If you have any questions, please feel free to contact me. Thank you.

Very truly yours,



William J. Downey

WJD/te

Enc.

cc: Frank T. Donaghue, Chief Counsel (w/enc.)  
Susan Hensel, Director of Licensing (w/enc.)  
Sherry Morgan, Licensing Analyst (w/enc.)  
Joseph W. Grad, Esquire (w/enc.)  
Nicholas Casiello, Jr., Esquire

A Pennsylvania Limited Liability Partnership



November 7, 2006

Mr. Patrick McKoy  
President/CEO  
Riverwalk Casino, LP  
Two Penn Center, Suite 200  
1500 JFK Boulevard  
Philadelphia, PA 19102

**Re: Responses to Review Comments by PA Gaming Control Board  
Riverwalk Casino, Philadelphia, PA**

Dear Mr. McKoy:

The following responses have been prepared to address review comments issued by the firm of Edwards and Kelcey on behalf of the Pennsylvania Gaming Control Board (PGCB). The comments were presented in a letter dated November 1, 2006, which was included as an attachment to a PGCB cover letter dated November 2, 2006.

The comment responses follow the format presented in the Edwards and Kelcey letter.

Review of the Submitted TIS for Conformance with Applicable Standards

1. Although we recognize the guidelines set forth by PennDOT, the guidelines for the Riverwalk Casino Traffic Impact Study were followed per the City of Philadelphia requirements regarding design year analysis. We reiterate that prior to beginning the Traffic Impact Study for the Riverwalk Casino, Pennoni Associates met with Robert Wright, Chief Engineer of the City of Philadelphia Streets Department on October 24, 2005. During the meeting, the proposed study area was presented to, and approved by the Streets Department. In addition, the selected study area meets the requirements of the *Philadelphia Zoning Code* (1998), §14-1803(3) (a) (.1), which calls for the evaluation of all signalized intersections within 400 feet of a proposed parking facility. In addition, we also had a verbal discussion with Mr. Paul Resch of the PGCB in early September 2006 regarding Edwards and Kelcey's review of the Traffic Impact Study. He noted that the City of Philadelphia applicable guidelines would be used versus the more stringent requirements of PennDOT.
2. Similar to item one, the base pre-development year of the analysis reflects a 2007 build year for the Riverwalk Casino such that pre-development versus post-development traffic impacts may be assessed. This analysis time period is per the City of Philadelphia requirements and not the more stringent PennDOT requirements.

Trip Generation

3. No comment response required.
4. Riverwalk Casino will coordinate with SEPTA regarding a suitable placement of a bus shelter that best serves the customers. As noted, a bus stop north of Spring Garden Street on Delaware Avenue potentially provides an ideal location to serve two bus routes, Route 25 and Route 43.

5. As noted in our Original Traffic Impact Study dated December 2005, it was our understanding that The Waterfront Square condominium development would have occupied 170 condominium units by year 2007. Based on the new information noted in Edwards and Kelcey letter report, approximately 300 units are opened, however approximately 75 percent of these units are occupied.

#### Analytical Approach/Tools Used

6. The Synchro analysis indicated a Right-Turn-On-Red (RTOR) reduction was taken and this is a result that the software is sophisticated to analyze when RTOR is permissible when taking into account conflicting vehicle movements during the "red" time. This prohibition is most likely a result of the signal design's protected left turn signal phases for Delaware Avenue such that right turn on red movements should not occur due to the conflicting protected left turn movements on Delaware Avenue. To assist the drivers when RTOR is prohibited, it is proposed that RTOR blank-out signs be provided on these approaches such that they can be "on" during the protected Delaware Avenue left turn movements.

#### Mitigation Measures

7. Although a conceptual plan with dimensions has not been prepared, Pennoni's proposed mitigation at the Delaware Avenue and Spring Garden Street intersection was checked for the feasibility of the addition of a northbound left turn lane within the existing median. The existing median width is 24 feet and 350 feet long. This permits the addition of two 12-foot left turn lanes; one for northbound and one for southbound at Nobel Street. The required storage for the anticipated 95 percentile queue for weekday and Saturday PM peak hour resulted in a 95 percentile queue of 150 feet and 140 feet, respectively. This queue length is less than the 350 feet. During the preparation of final design plans for the intersection improvements, these queue lengths will be used as a design parameter.
8. No comment response required.
9. No comment response required.
10. Pennoni has reviewed the feasibility of the southbound left turn lane on Delaware Avenue at Nobel Street and determine that sufficient space in width and length is present to support this improvement. The weekday and Saturday PM peak hour resulted in a 95 percentile queue of 270 feet and 260 feet, respectively. During the preparation of final design plans for the intersection improvements, these queue lengths will be used as a design parameter.
11. Riverwalk Casino intends to incorporate into the roadway improvements both bicycle facilities and pedestrian access along Delaware Avenue near Nobel Street and Spring Garden Street intersections.

#### Other Comments

12. Clear and informative signage will be implemented to inform patrons of the proposed Riverwalk Casino and the type of parking which will be available through each access point. Discussions with Riverwalk Casino and the architect have resulted that the access to the self-park garage

structure will be a “free-flow” operation such that customers will move freely into the garage structure. It is proposed that the self-park areas will be paid for based on the “parking space number” and estimated time duration of visit through the use of parking vending machines. An internal security enforcement is expected that will randomly check if the self-parked vehicles are paid.

Based on the Synchro analysis performed for the peak hour of operations on a weekday and Saturday, the calculated 95 percentile queues resulted in no traffic backing up onto Delaware Avenue from the parking garage entrance.

13. Although an accident history was not reviewed at the study area locations, the study area intersections are currently well designed and in accordance with current industry standards. Typically, accidents may be correctable at signalized intersections if poor signal clearance intervals (yellow and all red times), street lighting, and/or poor geometry are present. None of these conditions exists. However, upon final design of the roadway improvements, an accident history will be reviewed.

### Conclusions

- 1 & 2. Based on the primary concerns regarding the scope of intersections studied and the build year plus 10 year analysis, Pennoni has described in the Traffic Impact Study and supplemental reports the methodology for the traffic assessment. It is noted that Riverwalk Casino is committed to monitoring traffic operations both on-site and at off-site access roadways as previous described in our October 12, 2006 letter report. That report detailed the guidelines for the development of a Transportation Management Plan that will be prepared by a Transportation Coordinator who will be employed by the Riverwalk Casino.
3. The Waterfront Square Development will have an impact on the existing street system and Pennoni has provided an estimate of this impact based on the information provided by the City of Philadelphia and Penns Landing Corporation. Pennoni had requested a copy of any traffic studies performed by the Waterfront Square development and no studies were available.
4. Pennoni is a well respected engineering firm that takes pride in its work. We are confident that the proposed mitigations are feasible.

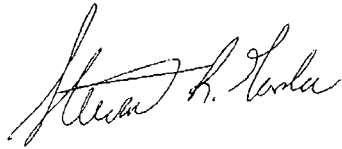
Additionally, as the design plans are further refined and developed, the Riverwalk Casino design team will consider the following items:

- Accident statistics to determine the need for safety measures,
- Per the Transportation Management Plan, Riverwalk Casino will be prepared to make operational adjustments to changing conditions,
- Resolve geometric design details,
- Coordinate with utilities regarding relocation needs associated with street and intersection improvements,
- Integrate public bus operations and stops with the roadway and site design,
- Ensure that self-park vehicles entering the parking garage structure will be free-flow operation to prevent queues onto Delaware Avenue,
- Work with the City Streets Department and Penns Landing Corporation to supplement the existing “way-finding” signs, and
- Ensure compliance with all ADA requirements within the study area intersections.

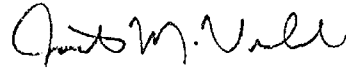
If you have any questions or require additional information, please contact our office.

Very truly yours,

**PENNONI ASSOCIATES INC.**



Stewart R. Gordon  
Project Manager



Jacinta M. Vrabel, P.E.  
Transportation Division