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December 1, 2006

VIA HAND DELIVERY AND E-MAIL
Mr. Frank Donaghue, Chief Counsel
Pennsylvania Gaming Control Board
Bureau of Licensing
5th Floor - Verizon Tower
303 Walnut Street
Harrisburg, PA 17106

Re: Category 2 License Application – Station Square Gaming LP
Docket No. 1363

Dear Frank:

Enclosed please find the response of Station Square Gaming, LP to the traffic impact study correspondence received from McCormick Taylor, dated November 29, 2006. A copy is being provided this date by our consultants to McCormick Taylor.

Thank you for your assistance on this matter. Should there be any questions, please do not hesitate to call.

Very truly yours,

Victor P. Stabile

C: Pam Lubold (via e-mail)
Joseph Schmidt (via e-mail)
Abe Naprastek (via e-mail)
David F. Kundrat, P.E. (via e-mail)

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transforming ideas into reality

December 1, 2006

Project C050619

Mr. Frank T. Donaghue
Chief Counsel
Pennsylvania Gaming Control Board
303 Walnut Street Strawberry Square
Verizon Towers 5th Floor
Harrisburg, PA 17101

Traffic Impact Study Correspondence 11/29/06
Harrah's Station Square Casino
City of Pittsburgh
Allegheny County, PA

Dear Mr. Donaghue:

Introduction

In response to the transportation study review comments from McCormick Taylor, we want to provide an overall framework and perspective to our specific responses listed below. The first perspective is regarding our coordination with the transportation review agencies involved with this development. We have attempted to obtain input from, and be responsive to the agencies involved. Before and during our conduct of this study, we met with the City of Pittsburgh Planning Department to review and obtain approvals of the study scope and base line trip assumptions. We have received letters from the City stating their approvals of these items. We met with PennDOT District 11 staff to review the study scope and recommended improvements. We also met in Philadelphia with representatives from McCormick Taylor to address and respond to their specific questions. We appreciate the opportunity they provided to us to address their concerns.

The second perspective we want to mention is the focus of our transportation analysis. The casino will operate 24 hours per day, seven days per week for a total of 168 hours per week. The highest traffic hours of casino operation occur on weekends and evenings when traffic conditions are not an issue at Station Square. The street system serving Station Square currently experiences congestion during the weekday commuter peak hours (7-9 AM and 4-6 PM) and related to events at the amphitheater. The casino traffic does not significantly impact the 7-9 AM period, and the proposed roadway improvements will result in better traffic conditions during those hours than currently exists today. The amphitheater is being closed, eliminating those traffic conditions. So, the future traffic conditions that are of primary focus of our traffic analysis are related to the five weekday 4-6 PM time periods. These represent 10 hours of the total 168 hours of weekly casino operations. Our transportation improvement program is based upon improving traffic conditions during those 10 highest traffic hours. The other 158 hours of weekly casino operations will occur during lower traffic periods when no congestion problems exist.

The following are our responses to the comments contained in the November 29, 2006 letter from Mr. Albert Federico of McCormick Taylor to Mr. Glenn Rowe of the Pennsylvania Department of Transportation.

Comment 1 (Approach): The study does not address the impact of the initial use of the existing 58,000 square foot restaurant/entertainment building for a temporary gaming facility and the discontinuation of public parking for commuters and gaming event attendees.

- The discontinuation of public parking will result in the diversion of vehicles to other parking facilities and will affect traffic patterns within the vicinity of the proposed project.
- The removal of the existing restaurant/entertainment uses will reduce the volume of traffic currently generated by the site; however, the removal of complementary uses will also increase the amount of external traffic generated by the proposed gaming facility.
- The placement of a temporary gaming facility east of the Smithfield Street Bridge and the related changes in projected traffic patterns are not addressed in the materials submitted.

Response 1: The existing 58,000 square foot restaurant / entertainment building on the east parcel will be converted to a temporary gaming facility. The peak-period traffic generated by the temporary gaming facility during weekday evening peak periods will be offset by the loss of the restaurant / entertainment / commuter parking traffic. Very little change to traffic usage at intersections in the area is anticipated. The peak-period traffic generated by the temporary gaming facility during Saturday evening peak periods will be offset by the loss of the restaurant / entertainment traffic now generated by the existing use of the building. The discontinuation of the public commuter parking during weekdays will result in the diversion of commuter parking to other fringe parking areas away from the Station Square area and possibly an increase in transit usage. The elimination of the restaurant / entertainment / commuter parking traffic in the area was considered in the computation of captured trips to the proposed gaming facility. For the computation of weekday captured trips for the gaming facility only existing weekday peak hour entrance trips were considered which does not include any commuter traffic or nightclub traffic for the time periods analyzed. A detailed traffic analysis for the temporary gaming facility will be completed for area intersections, reflecting conditions projected during the operation of the small (1500 machine) facility. Adjustments to signal phasings and timings will be made to accommodate any traffic pattern changes that are anticipated.

Comment 2 (Trip Generation): Due to the lack of available data in ITE Trip Generation regarding gaming facilities, the trip generation estimates for the gaming facility were based upon patronage and employment figures provided by Harrah's. It should be noted that the projected employment figures for the gaming venue have been reduced from the previous submission.

Response 2: Patronage and employment numbers were provided by Harrah's, one of the most experienced gaming operators in the world. They were found to be reasonable by the traffic study team by review of other published usage material. The initial employment figures were based on a general gaming operation. The current employment figures were reduced from those used for previous submissions to reflect employment characteristics for a facility providing for slots gaming only which is less labor intensive than for a general use facility. Employment

numbers have very little effect on the traffic peak hours that were analyzed since traffic management procedures will have shift changes taking place during non-peak traffic hours.

Comment 3 (Trip Generation): The methodology presented by the applicant for estimating project traffic generation appears reasonable; however, the trip generation for Harrah's Station Square Casino continues to be significantly lower than the other Pittsburgh gaming sites (from one-half to two-thirds) depending on the period.

Response 3: Our traffic estimates for peak usage time periods are lower than the other two proposed Pittsburgh gaming sites for the following reasons:

- The Station Square facility will have a higher percentage of transit use since the existing transit facilities can supply superior service.
- The Harrah's Station Square Casino will have capture from the existing 2.5 million visitors to the existing Station Square facility; the other sites do not have this capture potential.
- We used an appropriate vehicle occupancy rate of 2.35 persons per vehicle based upon survey results at 5 gaming locations (see attached). In addition, this rate was confirmed from proprietary data from Harrah's. The Majestic Star used 2.3 patrons per vehicle, while Isle of Capri used 1.18 persons per vehicle. The Isle of Capri evaluation clearly differs.

The City of Pittsburgh Planning Department has approved the transit usage percentages, capture rate, and vehicle occupancy rate used in our analyses

Comment 4 (Trip Generation) The 20% reduction assumed for interaction between gaming patrons and the existing Station Square uses do not reflect the previously noted changes to parking policies and the temporary gaming facility.

Response 4: The elimination of the restaurant / entertainment / commuter parking traffic in the area was considered in the computation of captured trips to the proposed gaming facility. For the computation of weekday captured trips for the gaming facility only existing peak hour entrance trips were considered which does not include any commuter traffic or nightclub traffic for the time periods analyzed.

Comment 5 (Analytical Approach): Incorrectly calculated peak hour factors have been used for the analysis of several intersections. These factors are generally too high and influence the results of the capacity analysis by improving the projected operations.

Response 5: The analysis method used results in the evaluation of traffic flows slightly greater than or equal to the traffic flows for the highest 15-minute period within the peak hours analyzed. The results for projected operations reflect more intense usage than average peak-hour usage. It is important to note that intersection usage for the other ninety-five 15-minute periods in a day will be less than for the period analyzed. PennDOT District 11-0 officials have reviewed our methodology and found it to be acceptable.

Comment 6 (Analytical Approach): The lane configuration and geometry of the intersections appear to be modeled correctly except as follows:

- The existing southbound right turn taper on Smithfield Street at Carson Street is assumed to be a full turn lane; and

- The length of several turn bays appears to have been omitted.

Response 6: A full right-turn lane exists at for the Smithfield Street approach to Carson Street. The coding of the turn-bays was done by the creation of a separate link with the added lanes included.

Comment 7 (Analytical Approach): There appear to be several areas where the modeling of traffic signal operations appear to be modeled incorrectly, including:
- There appear to be several opportunities where improved operations could be achieved by providing dedicated right turn lane "over-lap" green phases;
- Numerous protected phases are coded as permissive operations; and
- The phasing of Carson Street and Smithfield Street includes an additional, unneeded phase.

Response 7: Some over-lap signal phasing conditions do not occur today. They will be added to proposed phasing and timing plans to obtain improved operations. Some phases code as permissive actually should have been coded as protected, however these were at locations where there is no opposing traffic. The analyses are no different when these phases are recoded. The identified "unneeded" phase for the Carson Street / Smithfield Street intersection is an existing programmed phase that is occasionally used by emergency vehicles.

Comment 8 (Evaluation of Improvements): Vehicles using the existing access from the Smithfield Street Bridge will limit the potential utilization of proposed second southbound right turn lane at Carson Street. Additionally, while the study does not assume any traffic using this access beyond existing volumes, the tight turning radius may limit the effectiveness of the widening proposed for the access.

Response 8: The access to Station Square from Smithfield Street does not limit the utilization of the existing right-turn lane and is not anticipated to affect the operation of the second right-turn lane in the future. Due to the additional width of this access ramp the actual area to turn into makes the usable radius significantly greater than the physical curb-to-curb interior radius. Improvements proposed for the top and bottom of this ramp connection from Smithfield Street to Station Square will make the conditions better than they exist today.

Comment 9 (Evaluation of Improvements): As proposed the improvements to the intersection of Carson Street and Smithfield Street (providing two full southbound right turn lanes and a westbound right turn lane) will involve reducing northbound Smithfield Street to one lane approaching the bridge and widening along the east side of Smithfield Street

Response 9: The proposed widening creates a second southbound right turn lane, but does not change the existing northbound lane conditions. The northbound direction has two lanes in the morning and one lane the rest of the day. Lane usage is managed by the City of Pittsburgh.

Comment 10 (Evaluation of Improvements): The initial improvements to the eastern access should include reconfiguration to straighten the driveway approach, particularly if a temporary gaming facility is to be implemented.

Response 10: Agree.

Comment 11 (Evaluation of Improvements): In addition to the improvements noted in the previous analyses, the revised submissions include improvements to two additional intersections (Smithfield Street/Fort Pitt Boulevard and Carson Street/West End Circle), implementing new traffic control hardware to permit variable lane configurations to be used.

Response 11: This statement is correct.

Conclusion:

Our responses to McCormick Taylor's comments show that our procedures and analyses are technically correct and that the results are conservative. We analyzed traffic volumes equal to or greater than those for the peak 15-minute usage period for each intersection rather than average peak-hour conditions. Our analyses were based on modal usage, vehicle occupancy rates, and capture rates consistent with other casino locations and agreed to by the City of Pittsburgh Planning Department. Comparison of the factors and rates used for the Station Square location, a location that has excellent transit service and an existing base from which to capture existing entertainment patrons, cannot be compared to other locations that do not have these base characteristics.

If you have any questions or require additional information, please call me at 412.476.2000, extension 1722.

Sincerely,

GAI Consultants, Inc.

David F. Kundrat

David F. Kundrat, P.E.
Project Traffic Engineer

Enclosures

DFK/ptm

Cc: Mr. Albert Federico, McCormick Taylor
Ms. Susan Hensel, PGCB
Mr. Victor Stabille, Dilworth Paxon

Surveys of Vehicle Occupancy Rates at Existing Gaming Facilities (Submitted in PGCB Applications)

Casino Application	Existing Casino Surveyed	Size	Location	Survey Results
Presque Isle Downs - Erie	The Mountaineer Track & Gaming	80,000 sf of gaming 3,200 slot machines	Chester, West Virginia	**2.60** patrons/ vehicle
Chester Downs Philadelphia	Atlantic City Casinos	13 Major Casinos 1.3 Million SF	Atlantic City, New Jersey	**2.40** patrons/ vehicle
Majestic Star Pittsburgh	Casino Niagara	95,000 sf of gaming	Ontario, Canada	**2.30** patrons/ vehicle
Trump Casino Philadelphia	Delaware Park	2,500 slot machines	New Castle, Delaware	**2.25** patrons/ vehicle
Poconos Downs Racing	Saratoga Raceway	55,000 sf of gaming 1,300 slot machines	Saratoga, New York	**2.20** patrons/ vehicle
Isle of Capri Pittsburgh	San Pablo Lytton Casino	800 slot machines 30 table games	San Pablo, California	**1.18** patrons/ vehicle