

January 13, 2014

Pennsylvania Gaming Board PO Box 69060 Harrisburg, PA 17106-9060

RE: Traffic Impact Study Review Summary for the Pennsylvania Gaming Board (PAGB)

Dear Pennsylvania Gaming Board:

Orth-Rodgers & Associates, Inc. (ORA) with collaboration and feedback from the Pennsylvania Department of Transportation (PennDOT) District 6-0 and the City of Philadelphia have finished reviewing the initial traffic studies and the final traffic studies submitted on behalf of the Applicants. The five applicants are:

- The Provence Casino by Tower Enterprise, LLC
- Market8 Casino by Market East Associates, LP
- Live! Casino and Hotel by Stadium Casino, LLC
- Hollywood Casino by Penn National Gaming, Inc.
- Casino Revolution by PHL Local Gaming, LLC

(It is noted that the proposed Wynn Philadelphia Casino application submitted by Wynn PA, Inc. was withdrawn. Therefore, a summary was not provided for this applicant.)

In the fall of 2012 the PAGB received the initial traffic studies submitted by each Applicant. Thereafter, ORA reviewed the Applicants' initial traffic studies, including some revised information, and determined that the studies did not meet the proper guidelines. In April 2013, correspondence was sent to the Applicants' traffic consultants requesting their initial traffic studies be updated to meet the specific guidelines provided by:

- The City of Philadelphia
- The "Policies and Procedures for Transportation Impact Studies" prepared in accordance with Strike-Off Letter 470-09-04 by PennDOT
- The "Executive Summary of the Interim Report of Findings" prepared by the Philadelphia Gaming Advisory Task Force

Specifically, each Applicant was asked to provide traffic analysis for their Project Site for the opening year and for the horizon year. The horizon year is five (5) years beyond opening year when the first structure is in use and access is constructed to the public roadway.

The Applicants continued to submit updated traffic studies pursuant to ongoing review comments. All final traffic studies were completed by the five Applicants' traffic consultants by early December of 2013.

Our findings indicate that, in general, the traffic studies reasonably met the required guidelines and addressed our comments. All sites have limited impact to traffic during the build year and five year after build year, except for the Provence Casino. Due to its location and the critical links required to access the Vine Street Expressway (I-676), some local streets will experience degradation in level of service if proper mitigation is not provided. However, the Provence Casino applicant has committed in writing (letter dated December 19, 2013) to address these issues.

The Hollywood Casino applicant has proposed an off-site infrastructure road improvement project to access I-76 by constructing a westbound on-ramp at 7th Street. Their study provided a preliminary analysis of the proposed ramp as a means of supplementary mitigation. The two other Applicants, located in the Sports Complex site, have also agreed in writing to participate in constructing this option (Live! Casino and Hotel letter dated December 12, 2013 and Casino Revolution letter date December 20, 2013).

All three Applicants located at the Sports Complex have agreed to work with the Sports Teams and the Delaware River Port Authority (DRPA) to finalize the traffic analysis as well as the design details of the proposed improvements. It is noted that sections of I-95 and I-76 located near the Sport Complex are in the jurisdiction of the DRPA. Any recommendations and improvements made that impact the DRPA property will require their approval.

In summary, all Applicants' traffic studies have undergone several reviews, and have been updated and conditionally approved. Moreover, all studies now meet the guidelines provided by City of Philadelphia, PennDOT, and the Pennsylvania Gaming Board. Furthermore, all Applicants have agreed to provide additional detailed transportation analysis and evaluations of specific impacts if granted a license. Each applicant has agreed in writing to work with PennDOT and the City of Philadelphia to refine and implement a final scope of required improvements. Additional results and findings providing in the Applicants' traffic studies are summarized for each applicant in the attached tables.

If you have any questions pertaining to the review, please contact Francis Hanney, Traffic Services Manager at PennDOT District 6-0 at 610-205-6560 or at fhanney@state.pa.us for assistance or comment clarification.

Respectfully,

Nik Kharva, PE, PTOE

Nikelif R. Khanva

Project Engineer

Attachments

cc:

Daryl R. St.Clair – PennDOT Bureau of Maintenance & Operations Bruce Montgomery - PennDOT Bureau of Maintenance & Operations Les Toaso – PennDOT District 6-0 Scott Fletcher – PennDOT District 6-0 Lou Belmonte, PE – PennDOT District 6-0

Transportation Impact Study Review Summary for the Pennsylvania Gaming Board

Francis Hanney – PennDOT District 6-0
Ashwin Patel, PE – PennDOT District 6-0
Manny Anastasiadis – PennDOT District 6-0
N.B. Patel, PE – PennDOT District 6-0
Richard J Montanez, PE – City of Philadelphia
Charles J. Denny, PE - City of Philadelphia
Kisha Duckett, EIT – City of Philadelphia
Steven Bolt, PE, PTOE - Orth-Rodgers & Associates, Inc.



#	COMMENTS	NOTES
	Project: Provence Casino by Tower Entertainment, LLC Traffic Planning & Design, Inc.	
1	The Provence Casino site has many challenges to implement the off site traffic improvements. These were noted and discussed in meets with the applicant's traffic consultant regarding the routes to and from the proposed casino site (i.e. N. 15th Street and Vine Street Local as well as N. Broad Street and Vine Street Local).	The applicant has agreed to provide further investigation and recommend improvements to these locations as stated in their final response letter dated December 19, 2013.
2	A large share of the proposed casino trips utilize I-676 and I-95. If the site is granted a license the applicant should be willing to investigate and provide arterial ITS implementation at various locations with the input from PennDOT and the City of Philadelphia. Some examples of operational improvements could be but are not limited to detailed exploration of upgrading signing, pedestrian facilities, trailblazer signs and potential ITS upgrade along the major trip distribution routes along the Callowhill Street and Vine Street corridors to and from I-676 and I-95.	Applicant has agreed to comply with this request.
3	If the site is granted a license then it is recommended that a post-development study to analyze actual casino complex trip generation and traffic operations be provided. This study should be performed approximately six months after opening and should address any unforeseen operational issues that may occur at that time.	
4	The TIS report seemed to have a higher transit mode reduction than recommended by the Task Force document. Additional the trip reduction calculation and methodology was requested. The applicant's traffic consultant indicated the modes of arrival percentages were applied to the anticipated visitors and converted to trips using load factors (patron usage) for each transportation mode.	The applicant's trip generation is different from what was originally requested and also different from the other applicants' methodology but additional justification was provided in their December 19, 2013 response letter.
5	If this site is granted a license the applicant should expect to be required to work with PennDOT and the City of Philadelphia to finalize all aspects of the traffic analysis as well as the design details of the proposed improvements.	Applicant has agreed to comply with this request.



#	COMMENTS	NOTES		
	ame of Project: Marekt8 Casino by Market East Associates, L.P. esigner: Pennoni Associates, Inc.			
1	The Market8 Casino site is located in close proximity to various multimodal transit routes and facilities. Therefore, the applicant should be willing to upgrade transit facilities such as providing bus shelters and improve transit stop locations.	Applicant has agreed to comply with this request.		
2	The applicant provided an in-depth pedestrian analysis including a detailed walking audit of the surrounding roadways around the site and proposed recommendations. The applicant should implement these recommendations in addition to providing full ADA compliance at various locations that were identified.	Applicant has agreed to comply with this request at locations that are technically feasible. A detailed response is provided in their December 20, 2013 response letter.		
3	A large share of the proposed casino trips utilize I-676 and I-95. If the site is granted a license the applicant should be willing to investigate and provide arterial ITS implementation at various locations with the input from PennDOT and the City of Philadelphia. Some examples of operational improvements could be but are not limited to detailed exploration of upgrading signing, pedestrian facilities, trailblazer signs and potential ITS upgrade along the major trip distribution routes along the Callowhill Street and Vine Street corridors to and from I-676 and I-95.	Applicant has agreed to comply with this request.		
4	If the site is granted a license then it is recommended that a post-development study to analyze actual casino complex trip generation and traffic operations be provided. This study should be performed approximately six months after opening and should address any unforeseen operational issues that may occur at that time.			
5	If this site is granted a license the applicant should expect to be required to work with PennDOT and the City of Philadelphia to finalize all aspects of the traffic analysis as well as the design details of the proposed improvements.	Applicant has agreed to comply with this request.		



#	COMMENTS	NOTES		
	Name of Project: Live! Hotel and Casino by Stadium Casino, LLC Designer: Stantec Consulting Services Inc.			
1	Live! Hotel and Casino has agreed to explore the addition of a new westbound I-76 On-Ramp at 7th Street if granted a license. This design option is a means of supplementary mitigation to the local street system and overall traffic management.	Applicant has agreed to comply with this request as indicated in their December 12, 2013 response letter.		
2	If the site is granted a license the applicant should be willing to investigate and provide arterial ITS implementation at various locations with the input from PennDOT and the City of Philadelphia.	Applicant has agreed to comply with this request.		
3	If the site is granted a license then it is recommended that a post-development study to analyze actual casino complex trip generation and traffic operations be provided. This study should be performed approximately six months after opening and should address any unforeseen operational issues that may occur at that time.	Applicant has agreed to comply with this request.		
4	If this site is granted a license the applicant should expect to be required to work with PennDOT, the City of Philadelphia, the Sports Teams and the Delaware River Port Authority to finalize all aspects of the traffic analysis as well as the design details of the proposed improvements.	1		



#	COMMENTS	NOTES		
	Name of Project: Hollywood Casino, Penn National Gaming Inc. Designer: Pennoni Associates, Inc.			
1	Hollywood Casino has proposed the construction of a new westbound I-76 On-Ramp at 7th Street as a means of better traffic management for both its traffic as well as the Sports Complex area. The Applicant provided preliminary traffic analysis for this option. A cursory review of this analysis shows improvements to the local street system as well as a reduction in impacts to the existing westbound I-76 On-Ramp at Broad Street.	Applicant has proposed this option as described in their revised Traffic Impact Study dated November 20, 2013.		
2	If the site is granted a license the applicant should be willing to investigate and provide arterial ITS implementation at various locations with the input from PennDOT and the City of Philadelphia.	Applicant has agreed to comply with this request as indicated in their December 16, 2013 response letter.		
3	If the site is granted a license then it is recommended that a post-development study to analyze actual casino complex trip generation and traffic operations be provided. This study should be performed approximately six months after opening and should address any unforeseen operational issues that may occur at that time.	Applicant has agreed to comply with this request.		
4	If this site is granted a license the applicant should expect to be required to work with PennDOT, the City of Philadelphia, the Sports Teams and the Delaware River Port Authority to finalize all aspects of the traffic analysis as well as the design details of the proposed improvements.			



#	COMMENTS	NOTES
	Project: Casino Revolution, PHL Local Gaming, LLC: : Langan Engineering & Environmental Services, Inc.	
1	Casino Revolution has agreed to explore the addition of a new westbound I-76 On-Ramp at 7th Street if granted a license. This design option is a means of supplementary mitigation to the local street system and overall traffic management.	Applicant has agreed to comply with this request as indicated in their December 20, 2013 response letter.
2	If the site is granted a license the applicant should be willing to investigate and provide arterial ITS implementation at various locations with the input from PennDOT and the City of Philadelphia.	Applicant has agreed to comply with this request.
3	If the site is granted a license then it is recommended that a post-development study to analyze actual casino complex trip generation and traffic operations be provided. This study should be performed approximately six months after opening and should address any unforeseen operational issues that may occur at that time. Some examples of operational improvements could be but are not limited to, signal timing, ITS upgrades, an examination of the need for a dual right turn lane at Front Street and Pattison Avenue option, better signage and line striping upgrades.	Applicant has agreed to comply with this request.
4	The applicant performed a limited pedestrian circulation study to and from the other sports venues to their site. The other to casino applicants at the Sports Complex site (Hollywood Casino and Live! Casino) provided more information regarding the preliminary pedestrian circulation to their site.	The applicant has agreed to provide additional pedestrian circulation study data if the applicant is granted a license.
5	If this site is granted a license the applicant should expect to be required to work with PennDOT, the City of Philadelphia, the Sports Teams and the Delaware River Port Authority to finalize all aspects of the traffic analysis as well as the design details of the proposed improvements.	