

January 27, 2014

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

**RE: Review of the revised Traffic Impact Study (dated January 24, 2014)
Market8 Casino by Market East Associates, L.P.**

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 has finished reviewing the recently updated Market8 Traffic Impact Study (TIS) that was resubmitted on January 24, 2014. This document provides comments and recommendations for the revised Market8 TIS.

The traffic study was revised due to a recently discovered error in estimating the number of casino trips for the proposed Market8 Casino. This error was caused by calculating the incorrect number of gaming positions for a comparable casino (SugarHouse) and that error was transposed into the Applicant's study to develop their own trip rates. The error was significant in that the Applicant under-estimated (by a factor of approximately 33 percent) the number of trips the casino could generate. This translates to an additional increase of 249 total trips during the weekday evening commuter peak hour, 290 total trips during the Friday evening casino peak hour, and 403 total trips during the Saturday casino peak hour.

Even though the casino trips increased by approximately 33 percent, the Applicant was able to demonstrate that the surrounding road network is capable of managing the extra trips with some mitigation measures. As previously stated, the error was corrected by the Applicant and an updated traffic study was recently submitted. The review of the updated traffic study indicates no significant change from our original findings except for the intersection at 9th and Market Street. The intersection overall level of service reduces from "A" to "B" during the Friday evening casino peak and delay values slightly exceed PennDOT's 10 second threshold. Still the traffic signal is considered operating at an acceptable level of service "B" for an urban environment. Therefore the Applicant has agreed to pursue alternative mitigation as stated in their commitment letter dated December 20, 2013. The city of Philadelphia and PennDOT have agreed to this alternative approach method to provide mitigation at other locations where feasible and beneficial.

Our findings indicated the Applicant's revised traffic study (dated January 24, 2014) reasonably met the guidelines contained in the Policies and Procedures for Transportation Impact Studies and is conditionally approved. Furthermore, the Applicant has provided a written commitment to supply additional transportation analysis and evaluations of specific impacts and improvements if granted a license.

Review of the revised Traffic Impact Study (dated January 24, 2014)

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
Project Engineer

Attachments

cc:

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