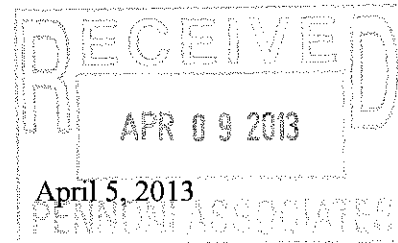




APPENDIX P

RELEVANT CORRESPONDENCE



Mr. James Markham, PE
Pennoni Associates, Inc.
One Drexel Plaza
3001 Market Street, Suite 200
Philadelphia, PA 19104

**RE: Market8 Casino Philadelphia
Traffic Impact Study Review**

Dear Mr. Markham:

Orth-Rodgers & Associates, Inc. (ORA) on behalf of the PA Gaming Control Board has reviewed the traffic impact study submitted for the proposed casino Market8 Casino by Market East Associates, L.P. The review has been completed with collaboration and feedback from the Pennsylvania Department of Transportation (District 6-0) and the City of Philadelphia.

This review evaluated completeness, consistency and compliance with applicable Department and City Regulations. The review has identified deficiencies that must be addressed in order for our review to continue.

Once the noted deficiencies have been addressed, please return the revised study with a letter indicating how each of the following comments has been addressed, and where each can be found in the report. All correspondence, calculations and data used for completion of the report must also be included in the report. The review comments are listed below:

GENERAL

1. Transportation Impact Study Guidelines

A Transportation Impact Study (TIS), prepared in accordance with Strike-Off Letter 470-09-04 (Policies and Procedures for Transportation Impact Studies) must be submitted by the Applicant. The information submitted by the Applicant does not fully comply with PennDOT's TIS guidelines. A compliant TIS report will require vehicular/pedestrian counts at potentially impacted locations, additional trip generation/distribution methodology, existing/future capacity analysis and recommendations and conclusions. Below are components related to a TIS report (not limited to) that should be included when applicable.

- a. A transportation impact study must be signed and sealed by a professional engineer registered in Pennsylvania.
- b. Include an Executive Summary.
- c. All proposed driveways should be evaluated for capacity, sight distance and queuing.
- d. Include detailed traffic circulation within the proposed site.
- e. Provide a traffic signal warrant analysis for any proposed traffic signal location.
- f. Provide crash data/history for critical intersections/roadway network. A summary of the crash analysis can be included in the report; however, actual crash records should be included

***Market8 Casino Philadelphia - Transportation Impact Study
Preliminary Review***

within the appendix with a confidentiality statement on the cover. It is recommended to separate the crash record appendix from the main TIS report.

- g. Traffic Signal and System Permit plans must be included in the traffic impact study.
- h. Street view photographs and/or aerial photos of the study intersections are preferred.
- i. The trips generated from other proposed developments that may impact the project site study area must also be included in the projected trip analysis.
- j. Include pedestrian distribution to/from venues and provide an access evaluation.
- k. Include an analysis of pedestrian activity at the intersections within the project limits, including the Applicant's proposed accesses, to determine if pedestrians are present. The determination if pedestrians are present must be based on pedestrian counts, a visual inspection of the site to determine if clearly defined walking paths are provided. The results of this analysis must be utilized to determine if and where pedestrian facilities must be provided.
- l. Provide pedestrian capacity analysis following the 2010 HCM guidelines for intersections that are found to be impacted by the increase of pedestrian traffic generated by the casino. Include mitigation improvements for those areas with high pedestrian traffic.
- m. Opening year analysis must be performed for the development. Future analyses must be performed for the horizon year, i.e. 5 years beyond opening year of the development when the first structure is in use and access is constructed to the State roadway. The report must be modified to reflect the opening year and Horizon year analysis for the development.
- n. Queue analyses for all signalized intersections and for unsignalized left-turning lanes must be completed and stated in the report.
- o. Auxiliary lane warrant analysis, in accordance with Strike-Off Letter 470-08-07, must be included for the proposed conditions.
- p. Include gravity model (a graphic is preferred).
- q. Do not use default values on the traffic analysis inputs (saturation flow rates, utilization rates, etc.). Where existing traffic and pedestrian data is collected, actual values should be used.
- r. A Level-of-Service Matrix per lane group must be provided. Including numerical delay value.
- s. The site accesses must function at a minimum level-of-service D for urban areas. Mitigation measures or restricted movements from deficient operating locations may be required to meet guidelines.
- t. All HCS and/or Synchro analysis worksheets and electronic files must be included for review.
- u. All calculations and methodology must also be included in the report to justify the analysis and results.
- v. The report should include conclusions and recommendations. Please note that the Developer/Applicant is responsible for mitigating all impacts resulting from the proposed development, unless there is another project under construction that will provide mitigation.
- w. If the recommendations include the elimination of existing on-street metered parking spaces, a revenue loss evaluation should also be provided.
- x. Include taxi and bus operation/circulation to/from the site.

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2. Trip Generation/Distribution & Mode of Arrival Methodology

Trip Rate (trip per gaming position) should be based on the average of no less than three existing casinos of comparable design and location. The three casinos listed below are valid examples of existing casinos located in metropolitan areas. If trip rates are based on a different methodology please provide justification.

- a) SugarHouse Casino (Philadelphia, PA)
- b) Casino St. Charles (St. Louis, MO)
- c) Hollywood Casino (Columbus, OH)

3. The “Executive Summary of the Interim Report of Findings” by the Philadelphia Gaming Advisory Task Force document should be utilized as a guide to develop trip methodologies. Data is provided for casino visitation patterns by time of day (Page 15, Table 3) and mode of arrival splits (Page 16, Graph 2). All analysis, calculations and back up data must be included in the report.

4. Time of Day Requirement

The Philadelphia Gaming Advisory Task Force document states that a casino’s Friday visitation peak time is different from the Friday evening rush hour time (commuter peak). The TIS report should analyze both critical weekday and weekend peak time periods. Therefore, the following should be analyzed:

- a) Friday evening commuter peak hour (between 4 – 6 PM)
- b) Friday casino peak hour (between 7 - 10 PM)
- c) Saturday casino peak hour

TRAFFIC IMPACT STUDY

1. In addition to the six (6) intersections included in the initial traffic impact study, the intersections that the applicant should also include in the study due to their proximity to the site and potential impacts are:

- 1) S. 10th Street and Walnut Street
- 2) S. 10th Street and Chestnut Street
- 3) N. 10th Street and Market Street
- 4) N. 10th Street and Arch Street
- 5) S. 9th Street and Walnut Street
- 6) S. 9th Street and Chestnut Street– *Provided in the initial TIS*
- 7) N. 9th Street and Market Street– *Provided in the initial TIS*
- 8) N. 9th Street and Arch Street
- 9) N. 9th Street and Race Street
- 10) N. 9th Street and Vine Street (Eastbound Local)
- 11) S. 8th Street and Walnut Street
- 12) S. 8th Street and Chestnut Street– *Provided in the initial TIS*

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- 13) N. 8th Street and Market Street– *Provided in the initial TIS*
 - 14) N. 8th Street and Arch Street
 - 15) N. 8th Street and Race Street
 - 16) N. 8th Street and Vine Street (Eastbound Local)
 - 17) N. 8th Street and Vine Street (Westbound Local)
 - 18) N. 8th Street and Callowhill Street
 - 19) S. 7th Street and Walnut Street
 - 20) S. 7th Street and Chestnut Street– *Provided in the initial TIS*
 - 21) N. 7th Street and Market Street – *Provided in the initial TIS*
 - 22) N. 7th Street and Arch Street
 - 23) N. 7th Street and Race Street
 - 24) N. 7th Street and N. Franklin Street
 - 25) N. 7th Street and Vine Street (SR 30/I-676 Westbound Local)
 - 26) S. 6th Street and Walnut Street
 - 27) S. 6th Street and Chestnut Street
 - 28) N. 6th Street and Market Street
 - 29) N. 6th Street and Arch Street
 - 30) N. 6th Street and Race Street
 - 31) S. 5th Street and Walnut Street
 - 32) S. 5th Street and Chestnut Street
 - 33) N. 5th Street and Market Street
 - 34) N. 5th Street and Arch Street
 - 35) N. 5th Street and Race Street
 - 36) N. 5th Street and SR 30/I-676 (towards Ben Franklin Bridge) – NOT Signalized
 - 37) Race Street and 4th Street
 - 38) Race Street and 3rd Street
 - 39) Race Street and 2nd Street
2. All intersection analyses should include actual pedestrian movements and not the default values provided in the capacity analysis software.
 3. As shown on the site plan provided with the TIS, it appears the site provides a single ingress access (on 8th Street) and a single egress onto 9th Street. Please provide further detail on how this access plan accommodates pick up/drop off operations for taxis, valet, and bus service. Additionally provide details on vehicular accessibility for on-site deliveries and for when the ingress or egress point is blocked between 8th and 9th due to an incident.
 4. In the appendix of the report the capacity analysis output indicates a default peak hour factor (PHF) value of 0.92 was used for all approaches. Use actual PHF values (per lane group) from the count data as opposed to the default Synchro value.
 5. It appears that the proposed parking facility does not fully provide the required parking spaces for the site. However the report indicated sufficient parking spaces are available at existing parking garages/lots. Identify the parking garages/lots that would be most often utilized for over flow parking in the vicinity of the site. In addition, please note if the applicant proposes to provide parking management services using smarting parking technology such as smart phone messaging, GPS applications, VMS signs, etc.

***Market8 Casino Philadelphia - Transportation Impact Study
Preliminary Review***

6. Identify any removal of public parking spaces and loading zones. If applicable provide the net revenue loss due to the reduction of existing metered parking spaces.
7. Although pedestrian crashes were provided, the leading pedestrian crash patterns were not identified. When applicable, please identify and provide pedestrian crash mitigation plan. (i.e. APS, ramps, pavement marking, etc.)
8. The study indicates that parking facilities adjacent to the proposed casino site would be able to support the parking needs generated by the casino patrons. The report must identify the location of the parking facilities, available parking spaces and verify that pedestrian accessible connectivity to/from the casino site is available. Please note that all pedestrian routes must be accessible and in compliance with the most current ADA regulations.
9. The study indicates a high distribution of traffic to and from I-676. The applicant should review the existing corridors connection to I-676, including an evaluation of impact on existing traffic signal systems. Any proposed changes along these key pathways to and from I-676 shall be clearly identified.

Please note that a response letter is required indicating how each of the following comments has been addressed, and where each can be found in the report. All correspondence, calculations and data used for completion of the report must also be included in the report.

Additional comments may follow upon review of the resubmitted report. If you have any questions pertaining to the technical aspects of this review, or if you are uncertain about how to address any portion of the indicated comments, please contact Francis Hanney, Traffic Services Manager at PA Department of Transportation District 6-0 at 610-205-6560 or at fhanney@state.pa.us for assistance or comment clarification.

Respectfully,



Derrick Kennedy
Senior Project Manager

cc:

Daryl, R. St.Clair – PennDOT Bureau of Maintenance & Operations
Lou Belmonte, PE – PennDOT District 6-0
Francis Hanney – PennDOT District 6-0
Ashwin Patel, PE – PennDOT District 6-0
Manny Anastasiadis, PE – 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
Steve Bolt, PE, PTOE - Orth-Rodgers & Associates, Inc.
Nik Kharva, PE, PTOE - Orth-Rodgers & Associates, Inc.

From: Francis Westerfer [<mailto:FWesterfer@philapark.org>]
Sent: Tuesday, July 30, 2013 2:46 PM
To: Don Gusic
Subject: Re: PPA revenue question

If the kiosk is going to remain in service, and if you are just talking about the elimination of 3 spaces, we're looking at approximately \$300.00 per week based on the revenue data for this particular location. However, we just removed the kiosk, thus eliminating parking altogether from Market to Ranstead.

>>> Don Gusic <DGusic@Pennoni.com> 7/24/2013 2:58 PM >>>

Fran,

I'm not sure if you're the person I should email, if not, if you don't mind forwarding this email I'd appreciate it.

We are in the process of doing a traffic study for a potential project in the vicinity of 8th and Market. The project proposes removing 3 parking spaces 8th Street between Market and Ranstead Street. From previous coordination with the PPA (I just can't remember who), I know that different locations in the city create different annual revenues and I believe PPA tracks this information. One of the review comments for the project requested putting an approximate cost to removing the parking spaces. Can you give me a ballpark annual revenue per parking space in this location of the city? Do you have any near term rate increases that you know of that we should factor in?

Thanks for your help.

Don Gusic, PE

Pennoni Associates Inc.

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CITY OF PHILADELPHIA

OFFICE OF THE DEPUTY MAYOR FOR ECONOMIC DEVELOPMENT
AND DIRECTOR OF COMMERCE
1515 Arch Street – 13th Floor
Philadelphia, PA 19102
(215) 683 - 4600
FAX (215) 683 - 4675

ALAN GREENBERGER
Deputy Mayor

August 14, 2013

Kenneth N. Goldenberg, President and CEO
The Goldenberg Group
630 Sentry Parkway, Suite 300
Blue Bell, PA 19422

RE: Gaming License Application for Market East Associates, LP

Dear Mr. Goldenberg:

On behalf of the City of Philadelphia, I am writing to thank you for your ongoing cooperation in sharing information about your proposed plans for a casino development. As the Pennsylvania Gaming Control Board evaluates the applications for the Category 2 Slot Machine License for Philadelphia, we intend to provide constructive and meaningful input to the Board. Specifically, we expect to testify before the Gaming Control Board on September 24, 2013 to share our perspective on the positives and concerns for each of the six proposals.

As we continue our evaluation of the six proposals, and given that additional information related to your proposal may now be available since we last met, I am inviting you to meet with representatives from a number of City agencies to discuss issues such as design, economics, traffic, crime, infrastructure challenges and other related topics. You can anticipate participation from Departments such as Commerce, Planning Commission, Licenses & Inspections, Streets, Water, Fire, Police and possibly others. To make this meeting as helpful as possible, these agencies would like to review updated project information beforehand so that they have their questions and comments ready at the time of the meeting.

We would appreciate as much of the following information as you can provide:

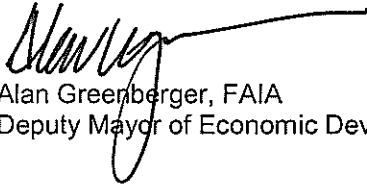
- An updated site plan showing to the fullest extent possible at this stage of the design the gross floor area and height of each structure, building elevations, total area and type of open spaces, the different uses within each structure, a breakdown of square footages based on programming, floor plans, updated renderings, the size and location of all parking areas and associated driveways, the size and location of loading areas, and signage;
- A summary of your traffic management plans, with the understanding that each applicant will continue to work through the PaDOT led process relating to traffic planning, traffic studies and traffic mitigation;
- Revenue projections for each revenue generating element of your development along with underlying assumptions including visitor counts (broken down by local and non-local visitation), room rates, parking rates, the amount or percentage of parking that will be free (if any), etc.;
- A detailed budget breaking down your total investment into construction costs, soft costs, equipment, etc.;
- Projected jobs broken down into at least three categories: direct construction; direct operational; indirect; and any economic studies supporting your conclusions;
- Infrastructure impacts including any utility or transportation upgrades required;
- A summary of the stormwater management approach proposed for the site;
- Public safety measures planned as a part of the operations;
- Details regarding community engagement in the development of your project;
- Any other updated information about your project that you believe would be pertinent to our assessment.

It is important to emphasize at this point that although we would like to discuss your proposal and identify any concerns that we may have, we will not be accepting any formal submissions from any applicants for the purpose of granting approvals (preliminary, conceptual or otherwise) until a Category 2 Slot Machine License has been awarded by the Gaming Control Board. This measure is to ensure that the City maintains a fair and transparent process for all applicants, and that expectations are managed uniformly.

Please provide updated information to John Mondlak, Senior Director of Real Estate Development, at john.mondlak@phila.gov (215.683.2009). If the information is too large to share digitally, his office is located at 1515 Arch Street, 12th Floor. He or someone from my office will be reaching out to your organization to set up a meeting before or during the first week of September. In order to fully review the new information pertaining to your proposal prior to meeting with you, we would appreciate receiving the requested project information by August 26th.

Thank you for your cooperation. We look forward to learning more details about your proposed plans.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Greenberger", with a long horizontal line extending to the right.

Alan Greenberger, FAIA
Deputy Mayor of Economic Development