

December 11, 2013

Mr. George C. Cressman, Jr., PE
Stantec Consulting
1500 Spring Garden Suite 1100
Philadelphia, PA 19130

**RE: Traffic Impact Study: 3rd Submission Review
Live! Hotel and Casino by Stadium Casino, LLC**

Dear Mr. Cressman:

Orth-Rodgers & Associates, Inc. (ORA) on behalf of the PA Gaming Control Board has finished the third review for the traffic impact study submitted for the proposed Live! Hotel and Casino by Stadium Casino, LLC. The review has been completed with collaboration and feedback from the Pennsylvania Department of Transportation (District 6-0) and the City of Philadelphia.

The third and final review of the TIS Report was performed. The findings indicated the report addressed all comments and reasonably met the guidelines contained in the Policies and Procedures for Transportation Impact Studies. The TIS review correspondence is provided in the attached document.

In addition, there are a few general comments prepared for the sites that are listed below. Please have your responses to these comments completed by December 20, 2013.

- The proposed Hollywood Casino applicant has put the construction of a new westbound I-76 On-Ramp at 7th Street on the table as a means of better traffic management for both its traffic as well as the Sports Complex area. An analysis was provided and their traffic study amended to reflect the addition of this on ramp. 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. Given the close proximity and identical use, will Casino Revolution also be willing to explore such an improvement as a means of supplementary mitigation and overall traffic management.
- 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.
- 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.

Casino - Transportation Impact Study
3rd Submission Review

- 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 Joint Toll Bridge Commission to finalize all aspects of the traffic analysis as well as the design details of the proposed improvements.

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 ghanney@state.pa.us for assistance or comment clarification. The Department as well as Orth-Rodgers have set aside December 12th, 13th and 16th should you or any of the applicants require a meeting to discuss the final report.

Respectfully,



Nik Kharva, PE, PTOE
Project Engineer

Attachment

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 – 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.



Pennsylvania Department of Transportation
 Engineering District 6-0
 7000 Geerdes Boulevard
 King of Prussia, PA 19406-1525
 Phone: 610-205-6661

Name of Project: Live! Casino by Stadium Casino, LLC
 Submission: Traffic Impact Study

Designer: Stantec
 Resubmission Date: November 22, 2013

REVIEWER INFORMATION	COMMENTS	DESIGNER RESPONSE	RESOLUTION
Orth-Rodgers & Assoc. for Engineering District 6-0 DATE: November 25, 2013 Is a resubmission required?: NO			
1. General	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.	We have addressed the comments provided and have met the guidelines contained in Policies and Procedures for Transportation Impact Studies.	
	a) A transportation impact study must be signed and sealed by a professional engineer registered in Pennsylvania.	Included on report cover.	Resolved
	b) Include an executive summary.	Included.	Resolved
	c) All proposed driveways should be evaluated for capacity, sight distance and queuing.	See Section 2.6 for sight distance assessment. Capacity analysis and queuing results are contained in Exhibits 8, 9, 10, and 11. Deficiencies are addressed in Section 4.7.	Resolved
	d) Include detailed traffic circulation within the proposed site.	See Section 4.1.	Resolved
	e) Provide a traffic signal warrant analysis for any proposed traffic signal locations.	Not Applicable - no new traffic signals were determined to be needed as part of this project.	Resolved
	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 within the appendix with a confidentiality statement on the cover. It is recommended to separate the crash record appendix from the main TIS report.	Crash data is contained in Appendix D. A summary of the crash data is presented in Section 2.5 and Exhibit 7. Exhibit 7 has been moved to Appendix D, and a confidentiality statement has been provided at the front of Appendix D. Appendix D will also be provided under separate cover.	Resolved, however, the crash data should be contained in a separate appendix from the main report. This appendix should also contain a confidentiality statement. Resolved.

	<p><i>g) Traffic Signal and system permit plans must be included in the traffic impact study</i></p> <p>Many of the existing signal plans in the appendix are unreadable. Can you please provide more readable copies (11"x17") in the next submission?</p>	<p><i>Traffic signal plans supplied by the City of Philadelphia Streets Department are contained in Appendix F. Traffic signal plans showing the recommended improvements have not been developed at this time.</i></p> <p>We improved the quality of the signal plans to the extent possible by not compressing the PDF.</p>	Resolved
	<p><i>h) Street view photographs and/or aerial photos of the study intersections are preferred.</i></p>	See Appendix B.	Resolved
	<p><i>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.</i></p>	Based on information obtained from the City of Philadelphia, there are no other developments currently proposed for the study area. A background growth rate of 1% per year was applied to address growth of the Naval Yard.	Resolved
	<p><i>j) Include pedestrian distribution to/from venues and provide an access evaluation.</i></p>	See Section 4.3.2.	Resolved
	<p><i>k) Include an analysis of pedestrian activity at the intersections within the project limits, including the Applicants proposed accesses, to determine if pedestrians are present. The determination if pedestrians are present must be based on pedestrian counts and a visual inspection of the site to determine if clearly defined walking paths exist. The results of this analysis must be utilized to determine if and where pedestrian facilities must be provided.</i></p>	Existing pedestrian volumes were obtained at each study intersection during the turn movement counts, and are shown on the peak hour volume diagrams. An assessment of existing pedestrian facilities adjacent to the proposed site is included in Section 2.3.	Resolved
	<p><i>l) Provide pedestrian capacity analysis following the 2010 HCM guidelines for the 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.</i></p>	The data that was collected for the TIS indicates very low pedestrian activity within the study area during the non-event periods. Furthermore, the proposed casino is unlikely to generate a large amount of pedestrian traffic. A multimodal trip split of 2%, which includes pedestrians, transit, and bicyclists, was assumed in the TIS based on information contained in Interim Report of Findings prepared by the Philadelphia Gaming Advisory Task Force (2007). This multimodal split results in less than 40 new pedestrians on the study area network. Therefore, a pedestrian capacity analysis was not conducted because it was determined that the analysis would not yield a result of significance.	Resolved
		Pedestrian activity between the proposed casino and the stadiums is likely to increase before and after events. However, based on the analysis presented in the TIS, it is likely that the majority of the additional pedestrian trips would be contained to S 10th Street and Darien Street, with very little additional pedestrian traffic crossing Packer Avenue. Again, a pedestrian capacity analysis was not conducted because the narrow and missing sidewalks along the site frontage would yield LOS F.	Resolved
		In lieu of the pedestrian capacity analysis, Stantec conducted an assessment of pedestrian connections to and from the proposed casino site. As a result, recommendation are presented in the TIS that would address the pre- and post-event pedestrian capacity needs, including improving the sidewalks along the site frontages. Other pedestrian amenities, such as pedestrian signal heads, ADA compliant curb ramps and push buttons, and consistent sidewalk treatments, are also recommended to enhance event and non-event pedestrian activity within the area.	Resolved

	<p>m) Opening year analysis must be performed for the development. Future analysis 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.</p>	<p>2016 opening year and 2021 horizon year analyses were conducted.</p>	<p>Resolved</p>
	<p>n) <i>Queue analysis for all signalized intersection and for unsignalized left-turning lanes must be completed and stated in the report.</i></p> <p>Storage lengths should be calculated in accordance with Pub 46. Calculate storage using the method in Chapter 11.16 and also using the 95th percentile queue from an accepted traffic engineering software package. Available storage lengths should also be provided in the report.</p>	<p><i>Queue analysis results are contained within the capacity analysis result matrices (Exhibits 8-11).</i></p> <p>Exhibit 11 has been added to the document to compare available storage lengths with anticipated average and 95th percentile queues. A discussion of the queue analysis has been added in the capacity analysis results sections of the report. Storage lengths for new storage bays are calculated in accordance with Pub 46. Calculations are shown in APPENDIX G.</p>	<p>Resolved</p>
	<p>o) Auxiliary lane warrant analysis, in accordance with Strike-off-letter 470-08-07, must be included for the proposed conditions.</p>	<p>Not applicable - no new auxiliary lanes are proposed in the TIS. However, improvements to existing auxiliary lanes are recommended.</p>	<p>Resolved</p>
	<p>p) Include gravity model (a graphic is preferred).</p>	<p>A gravity model was developed - see Section 4.3.1 and Exhibits 21-24.</p>	<p>Resolved</p>
	<p>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.</p>	<p><i>The Synchro 8 analysis models were calibrated with a combination of field data, observations, and factors for urban areas recommended in PennDOT Publication 46.</i></p> <p>Synchro outputs have been updated to reflect this information.</p>	<p>Resolved, however, the printouts included in the Appendix should provide input data such as Sat. Flow, Lane Width, Grade, PHF, T%, turn lane lengths, etc.</p> <p>Resolved</p>
	<p>r) A level of service Matrix per lane group must be provided; including numerical delay value.</p>	<p>See Exhibits 8-11.</p>	<p>Resolved</p>
	<p>s) <i>The site accesses must function at a minimum level of service D for Urban areas. Mitigation measures or restricted movements from deficient operations locations may be required to meet guidelines.</i></p> <p>The site access left turn is anticipated to operate at LOS F in both the opening and design year Friday Pre-event peak hours. However, all queued vehicles for this maneuver will be contained on site.</p>	<p>See Exhibits 8-11 and Section 4.7.</p>	<p>This comment was originally marked as resolved. However, it should be noted that if applicant is chosen, further detailed site access and driveway geometry needs to be analyzed to maximize efficiency and safety to and from the site.</p> <p>Resolved</p>

	<p>t) All HCS and/or Synchro analysis worksheets and electronic files must be included for review.</p> <p>The printouts included in the Appendix should provide input data such as Sat. Flow, Lane Width, Grade, PHF, T%, turn lane lengths, etc.</p>	<p>Synchro 8 worksheets are included in Appendix G. A CD containing the Synchro 8 files is included in the TIS document.</p> <p>Synchro outputs have been updated to reflect this information.</p>	Resolved
	<p>u) All calculations and methodology must also be included in the report to justify the analysis and results.</p>	See report.	Resolved
	<p>v) The report should include conclusions and recommendations. Please note that the Developer/Applicant is responsible for mitigating all impact resulting from the proposed development, unless there is another project under construction that will provide mitigation.</p>	See Sections 4.7, 5.0, and 6.0.	Resolved
	<p>w) If the recommendations include the elimination of existing on-street metered parking spaces, a revenue loss evaluation should also be provided.</p>	Not applicable.	Resolved
	<p>x) Include taxi and bus operation/circulation to/from the site.</p>	Taxi and bus access/circulation is described in Section 4.1.	Resolved
2. Trip Gen/Dist.	<p>Trip rate (trip per gaming positions) 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 location 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)</p> <p>Trip generation rates for the Casino seem in line with other available data. Also, since the existing hotel will be upgraded to fewer rooms, it appears that no additional trips should be added due to this land use. However, the addition of a 10,000 sf entertainment venue and 6,500 sf private event space should provide additional trips. Chances are that these facilities were not in use when the counts were done for the existing casinos.</p>	<p>The following three locations were used to determine an average trip generation rate for each peak hour, as well as arrival and departure splits: a) SugarHouse Casino (Philadelphia, PA) b) Casino St. Charles (St. Louis, MO) c) Rivers Casino (Pittsburgh, PA). Field data was collected in June 2013 at SugarHouse and Rivers, while published ITE data was utilized for the Casino St. Charles.</p> <p>The 10,000 SF entertainment venue has been eliminated from the site plan. Trips for the 6,500 SF private event space were generated utilizing LUC 931 (Quality Restaurant) because the ITE Trip Generation Manual does not contain a specific LUC for event space. Given that the event space will be part of one of the restaurant venues, and that the intended uses will likely result in patrons staying within the space for longer than one hour, "Quality Restaurant" provides the best approximation of activity within this space.</p>	Resolved
3. Phila. Gaming Ad.	<p>The "Executive Summary of the Interim Report of Findings" by the Philadelphia Gaming Advisory Task Force documents 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.</p>	<p>The Executive Summary of the Interim Report of Findings, developed by the City of Philadelphia Gaming Advisory Task Force (2007), was utilized to develop modal splits.</p>	Resolved
4. Time of day requirement	<p>The Philadelphia Gaming Task Force document states that a casino's Friday visitation peak time is different from the Friday rush hour time (commuter peak). The TIS reports should analyze both critical weekday and weekend peak time periods. Therefore, the following should be analyzed: a) Friday evening commuter peak hours (between 4-6PM, all non-event intersections), b) Friday evening with pre-Phillies event peak hour (all intersections), c) Friday Casino peak hour (between 7-10PM, only for intersections on Packer Avenue from S. Broad St. to Front St. and intersections on S. Front St. at the I-95 ramps), d) Saturday casino peak hour (only for intersections on Packer Avenue from S. Broad St. to S. Front St. and intersections on S. Front Street at the I-95 ramps).</p>	<p>Stantec has conducted analyses for the recommended peak hours.</p>	Resolved

Traffic Impact Study 1	<p>The following are a list of intersections that the applicant should include in the study area. These locations are based on the Langan study area from the "Philadelphia Sports Complex Parking and Traffic Management Plan" report, September 21, 2010. The applicant is responsible to use this study as the basis for their evaluation. 1) Penrose Avenue and Pattison Avenue 2) Pattison Avenue and S. Broad Street (Southbound) 3) Pattison Avenue and S. Broad Street (Northbound) 4) Pattison Avenue and S. 11th Street (Friday scenario with event only) 5) Pattison Avenue and S. Darien Street 6) Pattison Avenue and S. 7th Street 7) S. Broad Street (NB & SB) and Packer Avenue 8) S. Broad Street (NB & SB) and Pollock Street 9) Packer Avenue and S. 10th Street 10) Packer Avenue and S. Darien Street/I-76 Eastbound Off/On Ramps</p> <p>11) Packer Avenue and S. 7th Street 12) Packer Avenue and S. Front Street 13) S. Front Street and I-76 Eastbound On Ramp (unsignalized intersection) 14) S. Front Street and I-76 Westbound Off Ramps/I-95 Southbound On Ramp 15) S. Front Street and I-95 (SB Off/NB On Ramps)/Dunkin Donuts Driveway 16) S. Broad Street (NB) and S. 11th Street (Friday Scenario with event only) 17) S. Broad Street (SB) and I-95 SB Off Ramp 18) S. Broad Street (NB) and I-95 SB On Ramp 19) W. Oregon Avenue and S. Broad Street 20) I-95 SB and Exit 17 Off Ramp (Broad Street/Pattison Avenue) - Unsignalized Intersection 21) I-95 SB Off Ramp (Exit 19) and WB Packer Avenue - Unsignalized Merge Condition</p>	<p>Stantec has complied with the list of study area intersections.</p> <p>(continued from above row)</p>	<p>Resolved</p> <p>Resolved</p>
2	<p>Applicant will need to coordinate their analysis with the existing operation plan for the sports complex facilities. For the analysis of all event periods, the TIS shall include details of the current operation plan. If any proposed changes to the plan are recommended, it shall be clearly noted in the TIS. All information related to the existing operation plan for the sports complex facilities can be obtained from the Philadelphia Streets Department by contacting the Chief Traffic and Street Lighting Engineer.</p>	<p>Stantec contacted Richard Montanez via phone on 7/23/2013 regarding the potential impact of casino traffic on travel patterns within the stadium complex area before events. Mr. Montanez verified that the proposed trip distribution was acceptable and that access to the casino sites, as shown in the trip distribution diagrams, would not be impacted by event related street closures for events at Citizens Bank Park or the Wells Fargo Center. Mr. Montanez also noted the Eagles games would present a larger problem for traffic circulation within the stadium district; however, Eagles games are infrequent and outside the scope of the TIS. Therefore, no additional coordination for event activities was required for the TIS.</p>	<p>Resolved</p>
3	<p>Provide detailed pedestrian access information to/from each of the existing Sports Complex venues to the applicant's site.</p>	<p>See Sections 2.3, 4.3.2, and 5.3.</p>	<p>Resolved</p>
4	<p>The applicant has referred to the Langan Report as the underlying basis for the parking and traffic analysis of the proposed project site. Use the Sports Complex boundaries as indicated in the Langan Report for the study area. Integrate the site's trip generation/distribution into the existing traffic management strategy plan (Langan Report dated September 21, 2010).</p>	<p>Given the extensive nature of the pre-event data collection effort undertaken for this TIS, the Langan Report was not utilized. This TIS includes more recent data regarding traffic volumes and queuing during a pre-Phillies event, which also takes into account recent improvements to signalized intersections within the stadium complex. Furthermore, the long-term recommendations contained within the Langan report were not analyzed from a capacity analysis standpoint. Therefore, integration of the casino volumes within the Langan report for the purposes of assessing the long-term recommendations is not possible.</p>	<p>Resolved</p>

Additional TIS Comments			
5	On page 35 of the study, the title for the last paragraph has information missing.	Fixed.	Resolved
6	On page 36 of the study, it states that Packer Avenue could be restriped to provide an additional WB left turn lane. Have the existing shoulders been constructed to accommodate vehicular traffic?	Although we do not have the information to confirm the pavement depth on the shoulder, a field assessment indicates that the shoulders have been constructed to handle vehicular traffic. A full assessment of pavement depth would be conducted during the design phase of the intersection improvements to confirm. A note reflecting this will be added to this section of the study.	Resolved
7	The count data in the Appendix should provide peak hour volumes, peak hour factors, truck percentages, etc. for each of the peak hours studied in the report.	Excel versions of the TMC data sheets have been provided and reflect the PHV, PHF, and % HV used in the analysis.	Resolved
8	In the Synchro model, it does not appear that the intersections of South Broad Street and Pattison Avenue are clustered together to operate as one signal.	Rather than using the cluster editor in Synchro, this intersection has been modeled using concurrent offsets referenced to the same phasing pattern. This provides the same effect as clustering. We found that this method also better accommodated the SB leading left-turn movement at this intersection.	Resolved
9	In the Synchro model, it does not appear that the intersections of South Broad Street and Packer Avenue are clustered together to operate as one signal.	Rather than using the cluster editor in Synchro, this intersection has been modeled using concurrent offsets referenced to the same phasing pattern. This provides the same effect as clustering. We found that this method also better accommodated the NB/SB left-turn movement at this intersection.	Resolved
10	The signal plan for Pattison Avenue and South 7th Street does not appear to be correct.	It should be noted that some of signal timing plans provided by the City were outdated. This was an issue at the Pattison Ave intersections with S 7th, S Darien, and S 11th. The signal plans provided for these intersections did not reflect the protected-permissive left-turn movements that were recently added. Therefore, we used the provided plans as a base and adjusted based on field measurements.	Resolved
11	In the Synchro model, at the intersection of Pattison Avenue and Penrose Avenue, the WB approach should be two left turn lanes, a left turn/through lane, and a right turn lane.	The geometry is correct in the model; however, since we provided Synchro outputs showing lane groups, lane groups with 0 volume did not show up. We have corrected this issue by providing the Synchro outputs showing the individual lane inputs.	Resolved
12	In the Synchro model, at the intersection of Pattison Avenue and South 7th Street, the WB approach should have a left turn lane.	The geometry is correct in the model; however, since we provided Synchro outputs showing lane groups, lane groups with 0 volume did not show up. We have corrected this issue by providing the Synchro outputs showing the individual lane inputs.	Resolved
13	In the Synchro model, at the intersection of Pattison Avenue and South 7th Street, the SB approach should be a left turn lane, a through lane, and a right turn lane.	The geometry is correct in the model; however, since we provided Synchro outputs showing lane groups, lane groups with 0 volume did not show up. We have corrected this issue by providing the Synchro outputs showing the individual lane inputs.	Resolved

14	In the Synchro model, at the intersection of Packer Avenue and South Darien Street, the WB approach should be a left turn lane, two through lanes, and a right turn lane.	Corrected in the model.	Resolved
15	In the Synchro model, at the intersection of Packer Avenue and South 10th Street, the EB approach is striped as a left turn lane, a through lane, and a through/right turn lane.	Corrected in the model.	Resolved
16	Level of Service requirements need to meet Step 10 of PennDOT's Policies and Procedures for Transportation Impact Studies. It states...the applicant will be required to mitigate the LOS if the increase in overall intersection delay is greater than 10 seconds. It also states...If the intersection LOS meets the level of service requirements, applicants may still be required to provide mitigation to address critical lanes or approaches. There are a few locations where the overall LOS degrades by more than 10 seconds or where critical lanes degrade significantly (to E, F, or worse F).	We have adjusted the report text to identify those intersections where overall LOS degrades more than 10 seconds, or where individual movements fail. The recommended improvements have also been adjusted to address these locations.	Resolved
	a) In the 2021 Build condition, the intersection of South Darien Street/I-76 EB Ramps and Packer Avenue degrades from LOS B (16.3) to LOS C (31.5) during the Friday Commuter Peak Hour.	See above.	Resolved
	b) In the 2021 Build condition, the northbound right turn at the intersection of S. Broad Street NB and Pattison Avenue degrades from LOS F (129.8) to LOS F (152.1) during the Friday Pre-event Peak Hour.	See above.	Resolved
	c) In the 2021 Build condition, the eastbound left turn at the intersection of S. Darien Street and the Garage Driveway is anticipated to operate at LOS F (64.8) during the Friday Pre-event Peak Hour.	See above.	Resolved
	d) In the 2021 Build condition, the intersection of South Darien Street/I-76 EB Ramps and Packer Avenue degrades from LOS B (16.1) to LOS C (27.3) during the Friday Casino Peak Hour.	See above.	Resolved
	e) In the 2021 Build condition, the intersection of South Darien Street/I-76 EB Ramps and Packer Avenue degrades from LOS B (14.6) to LOS C (30.6) during the Saturday Casino Peak Hour.	See above.	Resolved
17	The results of the 2016 Build with Improvements are not presented in Exhibits 8-11.	Added to Exhibits.	Resolved
18	Is queue pre-emption provided on the I-76 EB off ramp?	The provided signal plans do not indicate pre-emption.	Resolved
19	Provide pedestrian improvements in Tables E-1 and 4.	Added	Resolved
20	Gaming facilities may qualify for supplemental signs under the "PennDOT's Guidelines for Casino Signing" program.		Resolved