

LOCAL IMPACT REPORT FOR EMERGENCY SERVICES

FOR

SANDS BETHWORKS ENTERTAINMENT COMPLEX

*City of Bethlehem, Ward 17
Northampton County, Pennsylvania*

**Tax Map 6, Block 2, Lot 2
Parcel ID: P6 2 2 0204**

November 2005

FPA No. 04C155DR2

Prepared for:

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TABLE OF CONTENTS

PART I – CITY OF BETHLEHEM EMERGENCY SERVICES

- 1.0 Introduction**
- 2.0 Existing Facilities Inventory**
 - 2.1 Central Communications Facility**
 - 2.2 Police Department**
 - 2.3 Fire Department**
 - 2.4 EMS (Emergency Medical Service)**
 - Map #1 – City of Bethlehem Emergency Services Locations**
- 3.0 Perceived Impact on Existing Services by City Officials**
 - 3.1 Police Department**
 - 3.2 Fire Department**
 - 3.3 Emergency Medical Services (EMS)**

PART II – SANDS BETHWORKS EMERGENCY SERVICES

- 1.0 Introduction**
- 2.0 Security**
- 3.0 Emergency Medical Services (EMS)**

PART III – CONCLUSION

PART I – CITY OF BETHLEHEM EMERGENCY SERVICES

1.0 Introduction

The City of Bethlehem is currently serviced by a staff of professionals who provide emergency services to the over 70,000 residents of the community, as well as, the two colleges, Lehigh University and Moravian College. As the City has grown over the years, so have the Police, Fire, and Emergency Medical Services (EMS) departments in an effort to provide the expected level of service residents' demand. Combined with personnel growth, the City has also upgraded equipment to meet the needs of the general population and educated the emergency service providers with new or modern techniques as they relate to police, fire, and emergency medical services.

These services are being provided on a daily basis with the personnel and equipment available. Traditionally, the former Bethlehem Steel site provided their own emergency services, thus, not encumbering those of the City. Only during large scale catastrophes, or out of the ordinary emergency services (i.e. bomb scares), were the City services enlisted to help with this section of Bethlehem.

The Las Vegas Sands Corporation proposes to construct an entertainment complex which will include restaurants, commercial recreation facilities, retail stores and 300 hotel rooms on the former Bethlehem Steel site. The site is designated and known as Parcel P6 2 2 0204 in the City of Bethlehem, Northampton County, Pennsylvania, and is the former historic Bethlehem Steel ore yard area located on the east and west side of the Minsi Trail Bridge.

The first part of this report is based upon conversations with the following individuals representing the City of Bethlehem:

- Randall P. Miller, Deputy Commissioner of Police
- Eugene Novak, Deputy Fire Commissioner/Fire Marshal
- Kevin G. Moyzan, Fire Commissioner
- Gordon Smith, Director of EMS

Also utilized for this report is the City of Bethlehem website:

- www.bethlehem-pa.gov/index.htm

A preliminary assessment of the Police, Fire, and EMS facilities is discussed along with the potential impacts from the proposed development.

2.0 Existing Facilities Inventory

2.1 Central Communications Facility

The City of Bethlehem emergency response common facilities are located in a central facility located at East Church Street along with other municipal services. This facility acts as a central calling hub for the Police, Fire and Emergency Medical Services (EMS). Calls handled by communication specialists, are routed to the appropriate emergency response department once the nature of the call is determined. The police department responds to every call with fire and/or emergency medical service response. Communication Center personnel operate state of the art radio equipment and mobile data computer terminals to pinpoint the origin of the call and dispatch appropriate personnel. The communications center handles in excess of 40,000 calls per year and is located within the police department, thus falling under their jurisdiction.

2.2 Police Department

The City of Bethlehem operates a police department with 146 sworn members and related staff to service the community. Police respond to all emergency calls logged into the Central Communications Facility via patrol car, motorcycle, bicycle, or on foot. Each vehicle is individually manned and each officer is trained in emergency response utilizing current state of the art police and communication equipment. The police department is also located with the municipal complex located on East Church Street.

Police Department Equipment Inventory:

- | | |
|-------------------------------------------------------------------|----|
| • Patrol Cars (marked and unmarked) | 52 |
| • Motorcycles | 8 |
| • Bicycles | 16 |
| • Specialty type vehicles
(swat, crime scene, traffic, mobile) | 4 |

2.3 Fire Department

The fire department of the City of Bethlehem operates out of five (5) fire stations throughout the City, each with their own personnel and equipment along with central offices located in the municipal building on East Church Street. The 114 person force is tied into the Central Communications Facility and can respond within minutes to any part of the City. Each station has at least one fire truck and two stations have an aerial truck which can provide firefighting or rescue up to 8 or 9 stories with proper access.

Fire Department Equipment Inventory:

- Fire Trucks 7
- Aerial Trucks 2
- Hazmat Truck with Trailer 1
- Rescue Boats 2
- Bomb Disposal Truck with Trailer 1

2.4 EMS (Emergency Medical Service)

Pre-hospital emergency care is provided for the City of Bethlehem by 16 full-time and 30 part-time State Certified Paramedics with four (4) additional paramedics anticipated for 2006. They operate out of a central facility located on Stefko Boulevard which is less than one mile from the proposed development. Currently, there are a total of 5 emergency response vehicles available, with an additional vehicle slated for 2006. Like the fire department, they can respond within minutes to any location within the City 24 hours a day, 7 days a week.

EMS Department Equipment Inventory:

- Ambulance (current) 5
- Ambulance (2006) 1

3.0 Perceived Impact on Existing Services by City Officials

3.1 Police Department

Currently, the south side of the City of Bethlehem generates the most calls requiring police assistance. One could easily initially assume that adding the entertainment complex to this area would place additional demands on the police force and response times to other areas of the City. For this reason a combined effort provided by the Sands BethWorks Security Force, and the City of Bethlehem Police Department will be required to offset this change. It is the intent of Sands BethWorks to bear the burden of this responsibility.

When shown the conceptual layout of the proposed entertainment complex, the Deputy Commissioner of Police indicated that a part time presence of police officers during peak hours of entertainment complex operation would be required. The Deputy Commissioner estimated this requirement, qualitatively, at two officers. Please note that at the time of the interview, the details of the extent of the security to be provided by Sands BethWorks had not been finalized. When the details of the extent of the proposed Sands BethWorks Security Force are set forth later in this report, it will be evident that the capabilities of the in-house security provided will far exceed that of two part time officers, and in the opinion of Sands BethWorks

eliminate the need for a regular presence of the City or Bethlehem Police Department, at the proposed entertainment complex.

3.2 Fire Department

The City of Bethlehem Fire Department anticipates that it could provide adequate service to the proposed entertainment complex site with its current apparatus and personnel available. There is a firehouse located approximately 1.5 miles from the site and is equipped with an aerial fire truck. At this time, no additional equipment is anticipated for the proposed entertainment complex by the fire department.

In addition, the facility will be constructed in accordance with all applicable fire codes, and will be fitted with a modern, state of the art fire detection system. Entertainment complex security personnel will be monitoring this system, and be in close coordination with the City Fire Department.

3.3 Emergency Medical Services (EMS)

Currently, the existing Emergency Medical Services are fully utilized and, at times, require the use of surrounding community Emergency Medical Services. The development of the entertainment complex would theoretically increase the number of calls due to its anticipated number of visitors. However, Sands BethWorks intends to provide a comprehensive EMS service in-house to safeguard their patrons.

Again, at the time of the interview with the City EMS Director, the details of the extent of the in-house EMS services provided by Sands BethWorks were not known. Operating under the assumption at the time that the City EMS service would carry the burden of responding to most first aid calls. It was estimated that one additional ambulance and crew would be required, with paramedics on duty 24 hours a day. Given the details of the proposed EMS services to be provided by Sands BethWorks that will be set forth later in this report, along with statistical data relating to EMS calls in a similar facility, it is the opinion of Sands BethWorks that the above addition to the City EMS service would not be necessary.

PART II – SANDS BETHWORKS EMERGENCY SERVICES

1.0 Introduction

In order to understand what the proposed in-house EMS services would be like at the proposed Sands BethWorks casino site, a telephone interview was conducted with Mr. David Shepherd of the Las Vegas Venetian Resort Casino Hotel (The Venetian). Mr. Shepherd has been the Director of Security at The Venetian since February of 1999. Mr. Shepherd is an expert in the field of security, having retired from the FBI after a 24 year career with extensive experience in law enforcement, security, intelligence and homeland security matters.

Mr. Shepherd described The Venetian as a 7.5 million square foot complex. The Venetian is directly connected to the Sands Expo and Convention Center which consists of an additional 2.3 million square feet. Mr. Shepherd is responsible for the entire facility. The Venetian itself has 4,027 hotel suites, a 116,000 square foot casino, and a retail, dining and entertainment complex of approximately 80 tenants. The average daily visitation of The Venetian is approximately 80,000 visitors per day.

By comparison, the proposed Sands BethWorks Entertainment Complex is slated to be approximately 437,000 square feet including the parking and hotel areas. Three hundred hotel suites are proposed, along with a 170,150 square foot casino, offering only slot machines. The average daily visitation of the proposed Sands BethWorks Entertainment Complex is estimated at approximately 13,700 visits per day, which is a fraction of the visitation of the Las Vegas Venetian under Mr. Shepherds care.

A summary of the security and EMS services provided by the Las Vegas Venetian, along with their dependence on local police, fire, and EMS services will therefore allow for conservative assessment of the potential impacts to the City of Bethlehem emergency services by the proposed Sands BethWorks complex.

2.0 Security

According to Mr. Shepherd, The Venetian has over 200 security personnel on duty at one time in the facility. These personnel include a plainclothes investigation group, which deals with issues in the hotel, a uniform staff which demonstrates a presence in the casino retail, and parking facilities, three bomb-sniffing dogs, bicycle units, and a staff for the central control room.

This security staff has jurisdiction only on The Venetian property, and functions as a separate police force for The Venetian facility. The Venetian Security Force can not arrest individuals suspected of a crime, but can detain them until the proper arresting authority arrives. Mr. Shepherd stated that in the past suspects have been turned over to the local Police, the FBI, Gaming Control, Homeland Security, and others, depending on the crime

the individual is suspected of. This fact alone supports that Mr. Shepherd and his security force are trained to a level comparable to any law enforcement agency. At 80,000 visits a day, Mr. Shepherd likens The Venetian to a City unto itself, with its own specialized police force.

Mr. Shepherd stated that due to the visibility, size, and training of the security staff the incidence of crime is low in his facility. This is due to the presence of uniformed security officers, and the scores of surveillance cameras strategically located throughout The Venetian. For those reasons, "people don't try anything," and that the incidents that his staff responds to are typically domestic fights and other minor offences. His staff is normally proactive and defuses an incident before it even becomes a chargeable offense. For this reason the number of arrests arranged with local police by Venetian Security Officials is less than one per day and the vast majority of those arrests are for minor offenses resulting in the issuance of citations. As a result, the frequency of the calls to the Las Vegas Metropolitan Police Department (Metro) for response to the site is less than one per day.

To Mr. Shepherd's knowledge, none of the 88 casino resorts in Las Vegas maintains local police officers on site. The reason for this is that at one call per day a local police unit on site would be enormously underutilized, and would be an inappropriate use of resources. Mr. Shepherd hypothesized that in order to justify the addition of a police unit for a given local police force, the anticipated number or calls per day would be far in excess of the one call for a misdemeanor on an average day at The Venetian.

Since the average anticipated visits to the Sands BethWorks Entertainment Complex are approximately 13,700 as compared to The Venetian Las Vegas' 80,000, one can assume that the impact to the Bethlehem Police Force will be far less than that of the Las Vegas Police Force. Sands BethWorks intends to provide a similar security force in Bethlehem as it provides at The Venetian in Las Vegas. The same visibility of the security personnel and security cameras, which in Mr. Shepherd's opinion reduce the incidence of crime in the facility, will be provided in the Bethlehem facility. A plan illustrating the number of security cameras proposed on the casino floor is provided at the end of this report as an illustration. The current projections for the Bethlehem entertainment complex are for a security department headed by a director of security with a staff equal to 50 full time personnel. Therefore, the expectation at the proposed facility in Bethlehem is that it would, as with The Venetian in Las Vegas and as is typical of casino operations in general, provide on its own all of the requirements for reasonable security and surveillance.

Please note that Pennsylvania Law requires that the proposed security and surveillance measures inside and outside of the proposed facility must be approved by the appropriate Board prior to construction.

For those reasons, and having the benefit of many years of law enforcement and casino security experience, Mr. Shepherd advised that he would expect an even more minor impact on emergency services in Bethlehem than the minimal impact on the local police force in Las Vegas. For this reason, Mr. Shepherd could neither justify nor support the incorporation of a police substation on the proposed Sands BethWorks Entertainment Complex site.

3.0 Emergency Medical Services (EMS)

Again, as a comparison to the proposed Bethlehem Facility, Mr. Shepherd described the emergency medical services operation at the Las Vegas Venetian. Mr. Shepherd stated that the security and EMS services at The Venetian are integrated. This is because all security personnel are trained at a minimum in CPR, water rescue, and certified to use the facilities 24 defibrillator units located throughout the complex. Mr. Shepherd also stated that two Certified Emergency Medical Technicians are on duty 24 hours a day. This training coupled with The Venetians elaborate security and surveillance systems allows for a near immediate response time by Venetian personnel to a medical emergency. Mr. Shepherd's staff is credited with the saving of several lives by use of the defibrillator units.

According to Mr. Shepherd, last year The Venetian recorded 327 calls to the local EMS service for emergency medical assistance. Again, this works out to just under one call per day. Mr. Shepherd advised that since the proposed Sands BethWorks entertainment complex is significantly smaller than the Venetian Las Vegas site that he would expect an even more minor impact on emergency medical services in Bethlehem than the minimal impact on this service in Las Vegas. Due to this low volume of calls Mr. Shepherd could not support the concept of having City EMS personnel on site in Bethlehem.

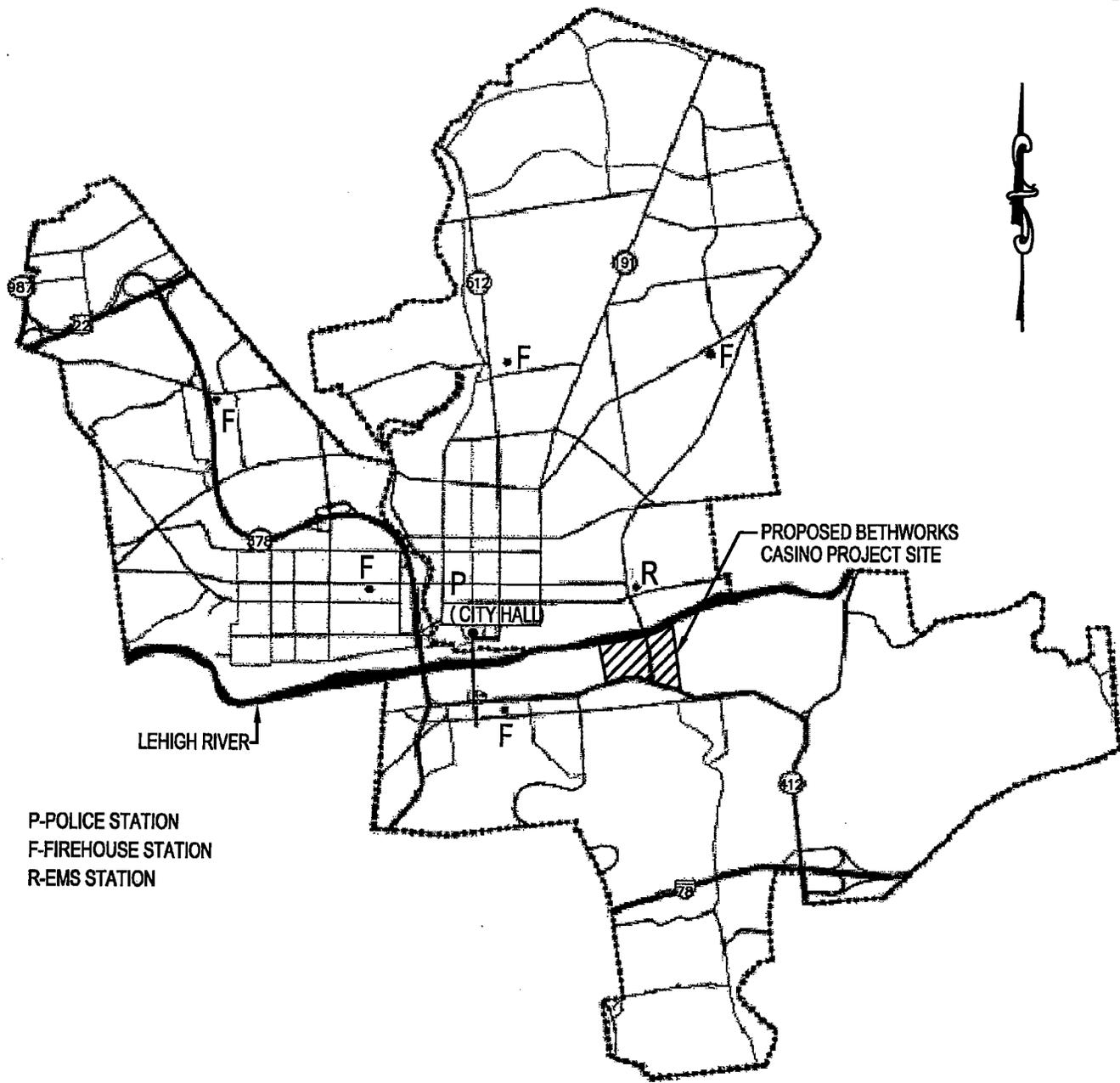
PART III – CONCLUSION

The proposed Sands BethWorks Entertainment Complex will have a minimal, if any, impact on the City of Bethlehem Emergency Services. This conclusion is drawn by making a comparison of the impact of the vastly larger Venetian Resort Casino Hotel in Las Vegas to the proposed Bethlehem site. The Venetian, which averages 80,000 visits per day, generates less than two calls per day on average to Las Vegas Metro Emergency Services. This statistic is according to Mr. Dan Shepherd, Director of Security at The Venetian.

If one assumes that the proposed Sands BethWorks Entertainment Complex also generated two emergency service calls per day, this would be a conservative assumption. The reason that this assumption is conservative is because the anticipated number of visits per day is only about 13,700, compared to The Venetians 80,000. The comparison between The Venetian Las Vegas facility and the proposed Sands BethWorks facility is valid, because:

- The proposed security at the Sands BethWorks site will be modeled after the security facilities in place at the Venetian Las Vegas site. These facilities will include a visible highly trained staff, capable of responding to both medical and security emergencies, a conspicuous camera surveillance system, and close coordination with all Local, State and Federal Law Enforcement Agencies, including the City Police.
- The Sands BethWorks security will include on staff EMS personnel and defibrillator stations, allowing them to respond to most common minor medical emergencies on site.

City of Bethlehem officials report 40,000 calls per year, to their central communications facility. This equals to about 110 calls per day on average. The two calls per day conservatively estimated for the Sands BethWorks site would represent less than a 2% increase in calls per day which in the opinion of Sands BethWorks is not a significant impact to the City. In addition, no impact is anticipated to the City of Bethlehem Fire Department since the City Fire Commissioner reported that he currently had sufficient resources to provide adequate service to the proposed entertainment complex site.



P-POLICE STATION
 F-FIREHOUSE STATION
 R-EMS STATION

SOURCE:
 WEB SITE FOR
 BETHLEHEM FIRE DEPARTMENT
 BETHLEHEM, PA
 WWW.BETHLEHEM-PA.GOV/FIRE/

EMERGENCY SERVICES LOCATIONS

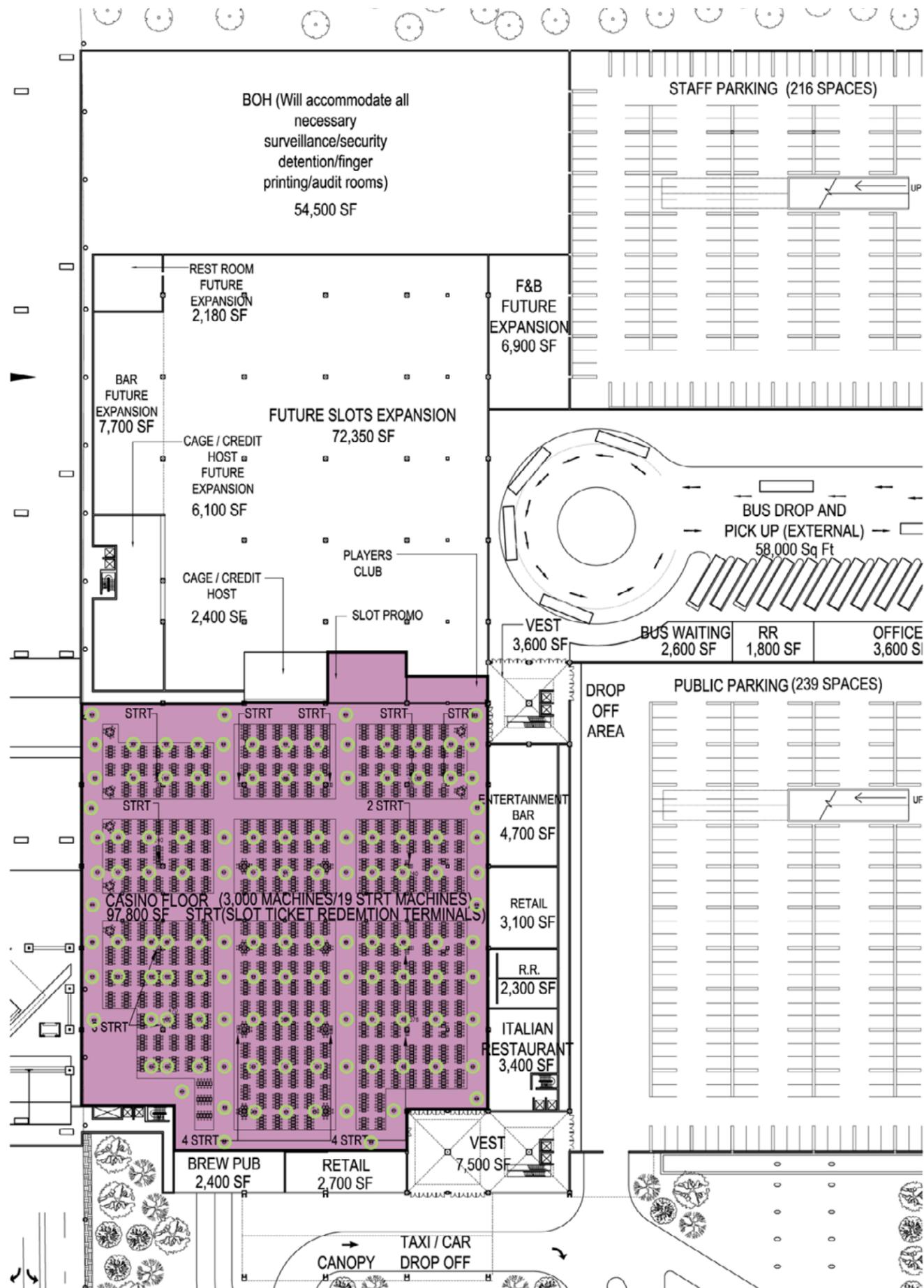
CITY OF BETHLEHEM
 NORTHAMPTON COUNTY PENNSYLVANIA



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DATE 11/25/05	DESIGNED BY -	SCALE N.T.S.	PROJECT NUMBER 04C155
DRAWN BY JSB	CHECKED BY RSP	FIELD BOOK -	DCA FILE -
			SHEET 1 of 1

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SURVEILLANCE CAMERAS

Slot Areas	123 PTZs
Progressive JP	1 Fixed Camera Per Machine
STRT	38 Fixed Cameras
Caged Areas	3 Fixed Cameras Per Cage Window 1 PTZ Per Four Cage windows 4 to 6 Fixed, 1 PTZ in Main Bank 4 to 6 Fixed, 1 PTZ in Coin Annex 8 Fixed, 2 PTZs in Hard Count Room 16 Fixed, 3 PTZs in Soft Count Room

All Cameras recorded on Digital recorders, 7 day retention, 30 to 60 frames per second.

● Camera Location

casino slot machine layout

sands bethworks
license application
bethlehem, pa.
december 2005