

	Design	Transportation	Fiscal	Opportunity	Community
TrumpStreet	★ ★	★ ★ ★	★ ★ ★ ★	★ ★ ★	★ ★ ★ ★
Pinnacle	★ ★ ★ ★	★ ★	★ ★ ★	★ ★ ★	★ ★
SugarHouse	★ ★ ★	★ ★	★	★ ★	★ ★ ★
Riverwalk	★ ★ ★	★ ★ ★	★ ★ ★ ★	★ ★ ★ ★	★ ★ ★ ★
Foxwoods	★ ★	★ ★	★	★ ★ ★	★ ★

Key	Poor	Acceptable	Good	Outstanding
	★	★ ★	★ ★ ★	★ ★ ★ ★

This analysis of the five proposed Philadelphia casino sites is the result of a comprehensive City review of the final applications, in conjunction with a broad outreach effort to neighborhood civic groups, gaming applicants and other stakeholders. The analysis considers the following five factors:

•**Design:** What is the overall design quality of the proposal, including its physical relationship and compatibility with the surroundings? Does the proposal include a strong complement of amenities? Does the design provide adequate public access (to the waterfront, on-site facilities)? Does the design adequately and appropriately incorporate parking? Does it comply with the provisions of the CED

•**Transportation:** Does the site have sufficient highway, road, and public transit accessibility? Does the application include traffic solutions that address adequately the casino's traffic impact? Does the applicant assume responsibility for the traffic solution and all costs? Does the applicant's traffic plan address adequately casino expansion and other planned development?

•**Fiscal:** Will the site selected increase host fees to the City and tax revenues to the Commonwealth? Does the proposal generate and address water and sewer infrastructure costs? Does the proposal generate and address public safety costs (EMS, ambulance, police)? Will the applicant pay full real estate taxes to City and the School District from the casino's opening day?

•**Opportunity:** Does the proposal include local ownership? To what extent will the proposal contract locally? How will the applicant recruit, train, and hire employees, and how will the applicant interact with the employees once they are hired? Does the applicant incorporate diversity, and local diversity, across the enterprise?

•**Community:** Has the applicant committed to funding a special services district to improve the surrounding area and keep it clean and safe? Will the applicant contribute to local charities and civic projects? Has the applicant been willing to enter into binding agreements with nearby community groups and/or the City?

Evaluation of Design Submissions

In reviewing the submissions, we determined that the viability of each project will depend on the thoughtfulness of the program, the relationship to surroundings, and the architectural design.

The City understands the renderings and plans are conceptual at this time. We also know the designs will become more detailed once the applicants are awarded their licenses. Yet the available documentation is minimal.

Each applicant has acknowledged additional design work will be required to balance the need for public access, mixed use, and successful operation of the casino. In addition, the applicants have committed to comply with the city's Commercial Entertainment District Ordinance.

In this process, we will need to protect against the temptation to omit important features or materials in an effort to economize.

With our mutual understanding that it is in the best interests of all to work together, the physical advantages and disadvantages of each project are outlined below, as part of the overall review of each site.

TrumpStreet

Design	Transportation	Fiscal	Opportunity	Community
★ ★	★ ★ ★	★ ★ ★ ★	★ ★ ★	★ ★ ★ ★



Transportation: The TrumpStreet site is in an area of the City served by I-76 and the Roosevelt Boulevard extension. Primary access from Roosevelt is via Fox Street to the north; however traffic can approach the site from all directions. The proposal provides adequate on-site parking.

The site is served by several SEPTA bus lines. There are light rail lines running in close proximity to the site, however, there are no current plans to reactivate the station. We believe that this would greatly improve the transportation plan for the development as well as benefit the broader community, by providing more transportation opportunities for employees and easy access to and from Center City.

A 10-year, full build study was conducted to determine the impact of traffic on the surrounding road network. The improvements suggested by the study include a number of modifications to City streets as well as ramps serving the Roosevelt Boulevard. The applicant will construct these improvements using its own funds for construction of ramp modifications serving Roosevelt Boulevard. The improvements to the street network, including important modifications at Henry and Allegheny Avenues will be completed in time to support the proposed build-out in 2009.

Fiscal: The TrumpStreet development has several elements that will lead to a comparatively positive fiscal impact on the City. Because of its location, TrumpStreet's development likely will maximize the gaming taxes paid to the Commonwealth and to the City. TrumpStreet has agreed to forego all tax abatements/incentives for the casino and directly related facilities (parking, restaurant, etc) on its site, but not for future residential development that may happen on another portion of the property.

City costs associated with this development (water, sewer, or similar infrastructure costs) will be borne by the developer. Similarly, TrumpStreet has taken responsibility for on-site EMS and ambulance needs, and will work with the City, State Police, and others to develop a casino-funded plan for site security, including as necessary, bike and traffic police. Finally, TrumpStreet has committed to use natural gas from the City-owned utility for the project.



Opportunity: The TrumpStreet proposal is located adjacent to an area that desperately needs jobs and commerce. TrumpStreet has a broad range of commitments related to employment, with a contractual commitment to hire 90 percent Philadelphians and 75 percent of its employees from within the immediate vicinity of the casino. These commitments will be implemented in conjunction with aggressive training, diversity, labor relations, and employee application funding commitments. TrumpStreet has teamed with the Allegheny West Foundation to develop a creative outsourced warehouse program that will provide opportunities for ex-offenders who, because of state gaming licensing requirements, would otherwise be ineligible to benefit directly from these opportunities. There will also be significant opportunities for small businesses in the vendor court. TrumpStreet is working to identify vendors from the immediate area to take those positions.

Only a very small portion of the equity ownership in this project is held by local minorities. The City would urge the Board to condition any license issued to TrumpStreet on expanding its ownership group to include a broader range of ownership interests.

Community: The TrumpStreet team has engaged fully the surrounding communities. It is the only applicant with an executed Community Benefits Agreement, which it has agreed to incorporate into its license approval by Gaming Control Board and has expressed interest in supporting a Special Services District. Nonetheless, there remains some community opposition to gaming at this location.

The redevelopment of this site presents a significant revitalization opportunity for this community and TrumpStreet has committed to partnering with the community and the City to that end. The TrumpStreet team has also committed to a one-time financial support of scholarships for local students.

	Design	Transportation	Fiscal	Opportunity	Community
Pinnacle	★★★★	★★	★★★	★★★	★★



This team has placed a priority on investing in the design with the philosophy that a good design is a prerequisite for the success of the project. While the team has presented an extensive record of corporate citizenship in other places, it has not executed an agreement with the community.

Design: The Pinnacle site has ample room for the casino and associated spin-off development. Unlike other sites, there is a buffer of the I-95 freeway and non-residential land between the site and adjacent residential neighborhoods.

Generally, the design presentation fully shows the type and arrangement of uses, and the character of outdoor social spaces. The project has been developed as a destination and landmark for the city by making the river a centerpiece of the design and by taking full advantage of the waterfront location.

The architectural design features a clear organization of circulation and well proportioned buildings along the water. Light, water, and water features are employed to create a landmark that can be enjoyed by both the general public and visitors to the casino. The project features mixed uses to attract a range of visitors, including a movieplex, ice skating and public access to the water's edge. The edge of the project facing Delaware Ave has been designed as a landscaped open space in response to public comment and has been well received.

The amenities for the project will be constructed in the first phase including the public trail, open space facing the water, and the supporting restaurants and retail.



Transportation: The Pinnacle site is located in an area served by Delaware Avenue and I-95 and is highly dependent on I-95 for getting traffic to and from the site. In the short term the primary access to the site will be from Delaware Ave.

PennDOT plans to reconstruct the I-95 interchange at Girard Avenue to be completed in 5 to 8 years. After the Girard interchange is built, the off ramps will serve the site within one block of the main entry. Until this ramp is constructed there will be significant traffic impacts on the neighborhood. There are no developer contributions for this highway project.

The site is well served by several SEPTA bus lines and the Route 15 trolley, which links the site to Girard Avenue to the south of the site. There is ample on-site parking available for all phases of the project.

Overall, the traffic studies for this site are not complete. Studies do not cover a 10-year build out or traffic coming from areas further south of the site nor do they include the traffic impacts of non-gaming facilities planned for the site at build-out. Moreover, studies do not address how traffic will reach the site during the prolonged period when the Girard Avenue interchange is under construction. Although a more complete traffic study is necessary, Pinnacle Entertainment has agreed to fund all necessary improvements to adjacent intersections to address traffic impacts.

Fiscal: Pinnacle has not been willing to enter into any direct commitments with the City prior to licensing that relate to fiscal impacts. In conversations, and in publicly-disclosed budgets, Pinnacle has indicated that it will fund all of the on-site infrastructure costs (water, sewer, etc) and will provide emergency medical and ambulance services. Pinnacle has not been clear on whether it intends to fund any of the necessary increased policing driven by the development and operation of this casino.

Pinnacle also has indicated that it will not apply for tax abatements for the casino development, but it intends to do so for the residential and movie theater portions of the development. Pinnacle has not been clear on its tax abatement position with respect to parking and restaurants, which the City considers to be part of the core casino development for this purpose.



Opportunity: Pinnacle is a publicly traded corporation, without any local ties and without local wealth creation at the ownership level, and without firm local employment commitments. In meetings, Pinnacle has stated that it will promote a diverse and local work force, but it is unclear what processes and efforts Pinnacle will undertake.

Recently, Pinnacle announced that Robert Johnson and a coalition of local investors will join its team, eventually owning one-third of the project. If the Johnson group is eventually approved by the Gaming Control Board, this project will involve a substantial minority owner, and several smaller stakes held by local minority owners. Pinnacle has a strong record of diversity promotion in contracting in other markets, but Johnson’s record of creating wealth for a diverse group of executives and contractors may be unmatched in recent American industry. We believe it is safe to assume that if the Johnson group joins the Pinnacle team, the City would meet its objective that all Philadelphians benefit from these unique wealth creation opportunities.

Community: The Pinnacle team has met with the surrounding communities, but has not executed an agreement with any group. The team does have a good track record in other locations for working with the surrounding community and addressing community concerns and goals. Pinnacle has a strong corporate commitment to maintaining excellent working relationships with neighbors in communities where it does business.

SugarHouse

	Design	Transportation	Fiscal	Opportunity	Community
	★ ★ ★	★ ★	★	★ ★	★ ★ ★



The Sugarhouse team has been generally responsive to input. The team, however, has not entered into firm agreements on a number of issues of interest to the City, including employment opportunity, fiscal impact and traffic impacts.

Design: The location for the Sugarhouse casino limits the potential for spin off development due to the presence of a residential community to the west across Delaware Avenue and the constraint of I-95 further inland.

The visual character of the design is dominated by the orientation and location of the parking garage, which appears as a single large block in the site plan. Parking dominates this proposal due to the number of spaces indicated on the current plans.

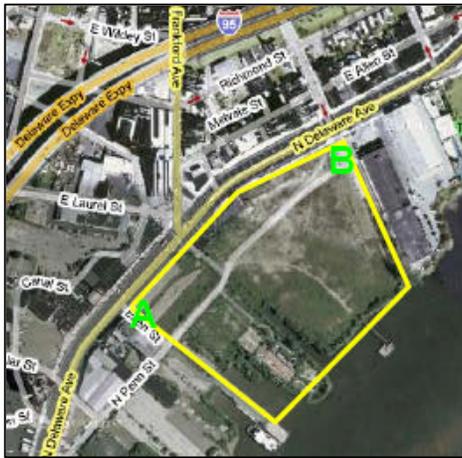


While the project includes public access around the perimeter of the site, it is arranged so that the clearest and easiest route to the water passes through the casino space.

In the initial phase, the project includes a surface parking lot, in violation of the intent of the City’s Commercial Entertainment District zoning. This parking lot is of concern should subsequent phases of the project not be built, although, the project proponents have expressed a willingness to work with the Planning Commission as the design progresses. 10

SugarHouse

Design	Transportation	Fiscal	Opportunity	Community
★★★	★★	★	★★	★★★



Transportation: Sugarhouse is located in an area served by Delaware Avenue and I-95. In the short term, the primary access to the site will be from Delaware Avenue.

PennDOT plans to reconstruct the I-95 interchange at Girard Avenue in 5 to 8 years. Once the Girard interchange is built, the off ramps will serve the site within ½ mile of the main entry. There are no developer contributions for this highway project.

The site has limited public transportation service. The proposal provides for adequate on-site parking but includes a large surface parking lot in Phase I. If Phase II is not constructed, an alternate long-term solution to parking is uncertain.

Overall, the traffic studies for this site are not complete. Studies covered a 10-year build-out, but the applicant’s analysis does not include intersections to the south on Delaware Avenue. Although a more complete traffic study is necessary, Sugarhouse has agreed to fund all necessary improvements to adjacent intersections to address traffic impacts.

Fiscal: The SugarHouse proposal does not commit to forgo tax abatements/incentives on development at this site, an impact of approximately \$10 million per year on the City and the Philadelphia School District. While SugarHouse has agreed to fund on-site infrastructure, it has not made any commitments related to EMS, ambulance and policing costs beyond a willingness to continue to work with the City to explore these issues. We welcome the opportunity to continue discussions, but consider this reticence, at this late date, to be a concern.

	Design	Transportation	Fiscal	Opportunity	Community
<u>SugarHouse</u>	★★★	★★	★	★★	★★★

Opportunity: SugarHouse has evidenced an understanding of the City’s concerns and priorities in this area, but has not developed that understanding into implementable targets or processes, either with the City or with the community groups. There is negligible local minority ownership (less than 0.5%) and almost all of SugarHouse’s contracts to date have been with majority firms. It has identified a general contractor with a strong diversity record, and is willing to work with a unionized permanent work force, but, beyond that step, there is a lack of concrete steps to promote the inclusion of all Philadelphians in this opportunity.

Community: The SugarHouse team has met with the surrounding communities, but has not executed a Community Benefits Agreement with any group. The team has committed to a financial contribution to the establishment of a Special Services District, but has not made a specific dollar commitment.

Riverwalk

	Design	Transportation	Fiscal	Opportunity	Community
	☆☆☆☆	☆☆☆☆	★★★★★	★★★★★	☆☆☆☆

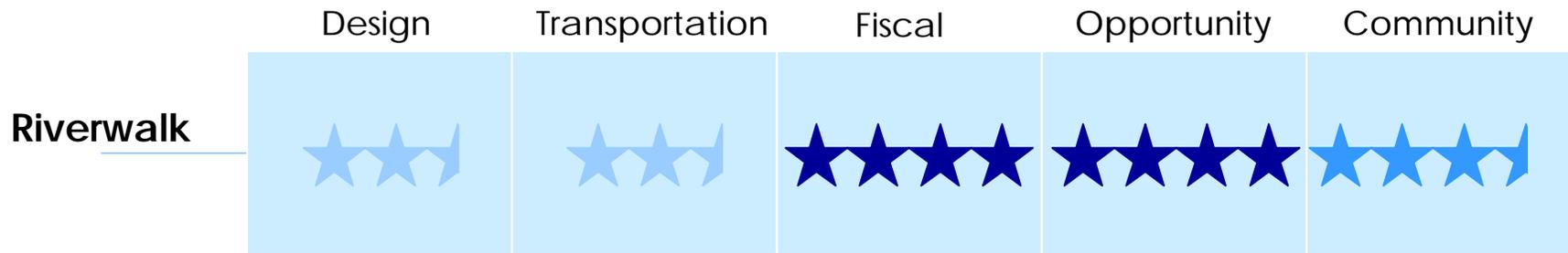


The Riverwalk team has been responsive and has made efforts to engage the communities surrounding the development. The team has expressed a willingness to enter into a Community Benefit Agreement with an organization representing the local community. Its level of minority and local minority participation is excellent.

Design: This site is located in an area with limited existing residential neighborhoods and a number of vacant or underutilized sites and buildings. A casino in this area has the potential to create a new entertainment district, which would have high visibility from the Ben Franklin Bridge and I-95 freeway network.

The site is the smallest of the five sites under consideration, which will require design creativity for future on-site expansion. The casino floor is raised one level off grade, and the ground level parking includes retail at the sidewalk to engage the street. The visual character of the design is dominated by the location of the parking garage; however, the design team is studying solutions which pull the garage back from the street to lessen the visual impact from Delaware Avenue and is looking at ways to use site amenities to ease the visual impact of the parking garage.

The agreement between Riverwalk and the Penn's Landing Corporation allows for a significant level of control over design concerns with this proposal.



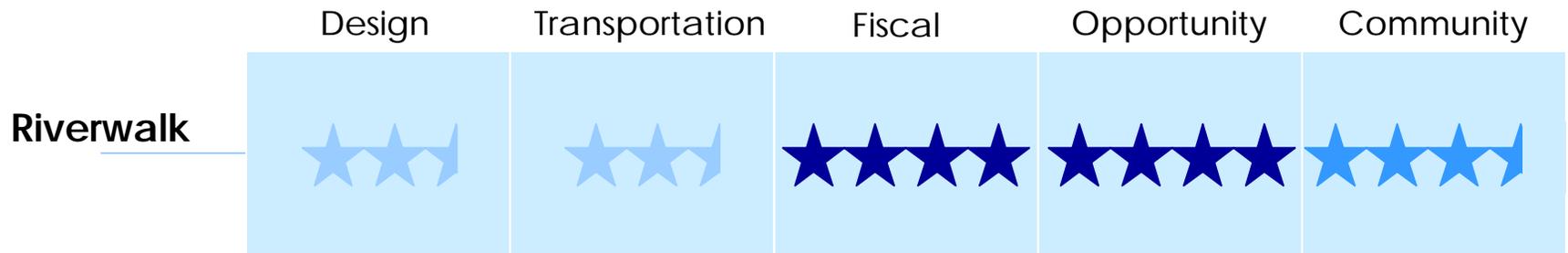
Transportation: The Riverwalk site is the closest to downtown Philadelphia and has the greatest potential of the waterfront sites to strengthen existing mass transit synergies with Center City. The site is within walking distance of Old City and has excellent public transit access with the Spring Garden Street station of the Market-Frankford elevated one block from the site. Several SEPTA bus lines serve Delaware Avenue and Spring Garden Streets adjacent to the site.

The Riverwalk site is highly dependent on traffic using I-95, at both the Callowhill Street and Girard Avenue interchanges. While the Girard Avenue interchange is proposed for reconstruction by PennDOT, that reconstruction will not be completed for 5 to 8 years.

Overall, the traffic studies for this site are not complete. Studies do not cover a 10-year build-out, and the applicant’s analysis has not included intersections to the south on Delaware Avenue. Although a more complete traffic study is necessary, Riverwalk has agreed to fund all necessary improvements to adjacent intersections to address traffic impacts.

Fiscal: The Riverwalk proposal has many elements that will lead to a comparatively positive fiscal impact on the City. Riverwalk has agreed to forgo all tax abatements/incentives on the entirety of its development at this site. The citizens of Philadelphia will benefit further as payment for the site will go to Penn’s Landing Corporation, a City-related non-profit entity that will use the money for the public good.

Riverwalk has agreed to fund City costs created by this development (including water, sewer, or similar infrastructure and EMS/ambulance services), and will work with the City, State Police, and others to develop a casino-funded plan for site security, including, as necessary, bike and traffic police.



Opportunity: The Riverwalk proposal emphasizes a commitment to meeting the City’s objective that all Philadelphians benefit from these wealth creation opportunities. Riverwalk is the only casino project with local minority control and double-digit local minority ownership. This commitment extends beyond ownership: Riverwalk has developed a strong diversity plan for contractors and vendors, a significant employee strategy that incorporates a union card-check agreement, a 95 percent Philadelphian hiring target, a commitment to fund GCB license application fees for employee applicants in the early years of operation and preferences for both immediate neighborhood hiring and a diverse work force reflecting the population of Philadelphia. Riverwalk has coupled these commitments with an innovative venture fund, to be funded by the local partners’ profits, that will dedicate \$250,000 a year to provide start-up funding for new local minority entrepreneurs.

Community: The Riverwalk team has met with the surrounding communities but has not executed a Community Benefits Agreement with any group. The team has agreed to fund the establishment of a Special Services District with an annual contribution of \$1 million. The Riverwalk lease with the Penn's Landing Corporation provides benefits to the public through the Penn's Landing Corporation for the term of the lease. A local component of the Riverwalk team has agreed to contribute a full 20 percent of its profits to local charities.

Foxwoods

	Design	Transportation	Fiscal	Opportunity	Community
	★★	★★	★	★★★	★★



View from Delaware River of boardwalk, entertainment district pier and twin hotel and condo towers.

The Foxwoods team has made efforts to engage the communities surrounding the development, those efforts have been rejected however. Realizing that traffic is an important issue, this team has done an excellent job in identifying the traffic issues and specifically suggesting solutions.

Design: In general, the Foxwoods site is near to established city neighborhoods with small neighborhood commercial uses. There is concern in the community that the existing commercial uses, neighborhood vendors and restaurants will be unable to compete with similar offerings at the proposed casino. While expansion of casino related activities is



possible it is more likely on other waterfront sites, due to the proximity of I-95 and the residential neighborhood immediately to the west of the highway.

Generally, the site is arranged to allow public access on all sides, as well as through the center of the project, without passing through the gambling floor. The project includes a 2,400 seat entertainment theater and the potential for retail activities on the pier. Without a timely resolution of riparian rights, however, the construction of the pier and its public space and retail activities, at best, will be delayed to a later phase of development.

While circulation and public access are adequate, the character of the architecture does not respond to the specific setting or the architecture of the neighborhood. From Delaware Avenue, the impression of the project is dominated by the orientation and location of parking facilities and vehicular drop off.

Foxwoods

Design	Transportation	Fiscal	Opportunity	Community
★★	★★	★	★★★	★★



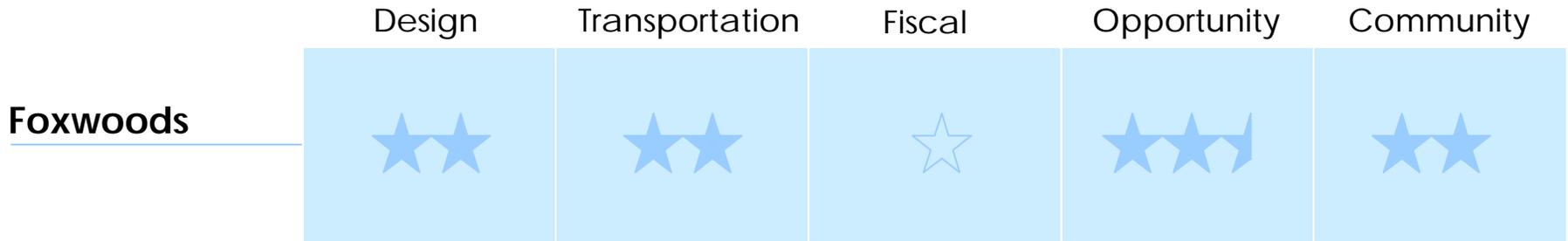
Transportation: The Foxwoods site is served by Delaware Avenue and I-95, with ramps within ½ mile of the site entry. The site has the most challenging traffic starting point and responded with the most complete traffic study. The study looks at the 10 year build out; it does not however, include the construction of the new Food Distribution Center to the south. However, the applicant has identified the improvements needed along Delaware Avenue and agreed to fund all necessary improvements to obtain the service levels its traffic requires.

Foxwoods is highly dependent on I-95 for access to and from the site and proposes that a new southbound exit ramp be constructed. The construction of that ramp has not been approved or funded, however, and is estimated to cost approximately \$100 million.

The Foxwoods study indicates that this ramp would need to be constructed in order to facilitate and handle the traffic that 5,000 slots would produce. If the ramp is not constructed, the viability of phase two construction and build out to 5,000 slots is problematic.

Fiscal: The Foxwoods development proposal does not commit to forgo tax abatements/incentives on development at this site, producing a negative impact of approximately \$10 million per year on the City and the Philadelphia School District.

While Foxwoods has agreed to fund on-site infrastructure and EMS/ambulance costs, Foxwoods does not believe that any additional policing will be necessary, contrary to the City's analysis.



Opportunity: Foxwoods ownership differs from the other proposals both in that the operating interest is owned by the Mashantucket Pequot Tribal Nation, and that a majority of the local ownership interest is held for the benefit of charitable foundations. Although local minority ownership is less than five percent, the Mashantucket Pequot Tribe ownership interest represents a minority ownership interest. The Mashantucket Pequot have a strong diversity history at their Foxwoods casino, the world’s largest casino, and elements of that plan are incorporated into the plan Foxwoods submitted to the Gaming Control Board.

Foxwoods has committed to attempt to hire 95 percent of its workforce in Philadelphia, with a focus on diversity and local hiring, and to work with local training programs to train this workforce.

Community: The Foxwoods team has made a concerted effort to meet with the surrounding communities, but has not received that opportunity. Significant community opposition to this proposal and to gaming at this site in general persists. Nonetheless, Foxwoods local partners (with a 42 percent ownership stake) have agreed to contribute all of their profits to local undesignated charities. Foxwoods has committed to funding a Special Services District, but without any specific dollar commitment.