

FINAL

VLT FACILITY OPERATION LICENSE IN
PRINCE GEORGE'S COUNTY

PARX CASINO

Secondary Review of Applicants' Traffic Flow
Studies

FINAL

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1. EXECUTIVE SUMMARY

Langan Engineering and Environmental Services, Inc. prepared a Preliminary Traffic Assessment for the Parx Casino site dated April 29, 2013 in response to the Request for Proposal (RFP) for a Video Lottery Operation License in Prince George's County, MD. The Parx Casino site is located along Old Fort Road (MD 414) between Indian Head Highway (MD 210) and Livingston Road in Fort Washington, Prince George's County, Maryland. The site is located approximately 3.3 miles from the Capital Beltway. According to the plan, the casino would include a maximum of 3,000 slot machines in Phase I increased to 4,750 slot machines in Phase II. The applicant is proposing a maximum of 170 table games (50 poker/120 Gaming) with ancillary bars and restaurants in Phases I and II. The site will also include a 2,680 seat event center for live entertainment and a 250 room hotel in Phase II.

Since the draft report was submitted to the Commission on November 26, 2013, the applicant has responded to questions raised with regard to their proposal by providing clarifications, revised analyses, and new financial commitments. An assessment of the applicant's revised proposal in terms of their Traffic Flow Studies was conducted to incorporate and address the new information provided to the Commission. The results of the assessment are provided in the Addendum in Section 8 of this report.

1.1 Background

The location and number of intersections within the study area appears to be appropriate given the scale of the project and likely paths taken by projected visitors to the site. The applicant uses the hourly volumes recorded on a Friday evening and Saturday which are typically the peak times of activity at a casino. However, they do not include a weekday AM peak hour when background volumes are high. The applicant does not include an annual growth rate coupled with development sites in the area that generate appreciable background traffic. This underestimation of future traffic volumes used in the traffic analysis could minimize potential impacts due to the project.

1.2 Projected Conditions

The applicant used a comparable existing Pennsylvania casino they currently operate to estimate trip generation for the proposed casino. When developing gaming positions used to determine traffic generation for a casino, the assumption of one gaming position equating to each slot machine is appropriate. The assumption of seven gaming positions are assigned for every table game is slightly less than the eight that some studies have used. It is counter intuitive that weekday PM peak hour vehicle rate is higher than the Saturday peak hour vehicle rate.

It was also appropriately assumed that the gaming and food and beverage were bundled together to the casino trip generation. However, since the applicant also assumes in the proposal that the entertainment venue is bundled with the casino trip generation, vehicle trips may be understated. The trip rate per room from the ITE Trip Generation Manual was appropriately used for the hotel component. The use of separate hotel and casino vehicle trip rates is conservative since some hotel guests frequent the casino.

Based on independent market research performed for the Commission, the routing assignment proposed by the applicant does not appear to be reasonable for the site. It appears that the

applicant understates the number of patrons that would travel to the site from outside of Prince George's County using the Capital Beltway and overstates the number of patrons that would travel to the site from the south (20% along Indian Head Highway) and from Prince George's County. As a result, more vehicles should be travelling north between the site and the Capital Beltway and less to the south.

Although transit service is provided to the area around the proposed site, it does not currently serve this site directly. Additional WMATA service to the site would need public funding. The applicant has presented the potential of a local shuttle bus that they could implement but no funding has been committed. Although not contemplated in the traffic analysis presented, these transit initiatives would reduce autos traveling to the site if implemented.

1.3 Analysis

The methodology used appears to be appropriate since it is more robust than the CLV Method used for traffic impact studies conducted in Prince George's County. Based on the results of the analysis, the effect of the project on area traffic would be extensive. Even with mitigation, congestion at the Indian Head Highway and Old Fort Road intersection worsens during both time periods studied without the grade separation. In addition, the Livingston Road/Palmer Road intersection congestion worsens during both periods analyzed for Phase I and Phase II (with mitigation improvements).

1.4 Proposed Improvements

The applicant is committed to pay 100% of the \$10M in roadway improvements proposed for Phase I of the project. However, it does not appear that the initial improvements in Phase I mitigate all of the projected impacts. Further, the applicant is seeking a public/private partnership to fund up to \$100M of their funds in planned highway improvements for the Indian Head Highway (MD 210) corridor. These roadway projects are needed to accommodate projected traffic for Phase I and Phase II of the project. Since the state does not have any plans to fully or partially fund grade separations at the Indian Head Highway (MD 210) intersections at Livingston Road/Palmer Road or Old Fort Road, there is no timetable for when or if they get implemented. If these projects are not implemented, Phase I traffic will be problematic and Phase II cannot be implemented.

1.5 Parking and Internal Access

The main vehicular access into the site is split by driveways on Old Fort Road and Livingston Road in Phase I plus a direct ramp from Indian Head Highway southbound in Phase II. Based on preliminary plans, the small overall size of the site layout may not allow for vehicles to move freely around the site. Based upon the initial layout, it appears that internal site circulation could be an issue. However, this could be addressed as detailed designs are prepared.

2. INTRODUCTION

A Preliminary Traffic Assessment was prepared for the Parx Casino site by Langan Engineering and Environmental Services, Inc. dated April 29, 2013 in response to the Request for Proposal (RFP) for a Video Lottery Operation License in Prince George's County, MD. The Parx Casino site is located along Old Fort Road (MD 414) between Indian Head Highway (MD 210) and Livingston Road in Fort Washington, Prince George's County, Maryland. The site is located approximately 3.3 miles from the Capital Beltway. According to the plan, the casino would include a maximum of 3,000 slot machines in Phase I increased to 4,750 slot machines in Phase II. The applicant is proposing a maximum of 170 table games (50 poker/120 Gaming) with ancillary bars and restaurants in Phases I and II. The site will also include a 2,680 seat event center for live entertainment and a 250 room hotel in Phase II.

In Phase I, the main access point for all entering patrons and exiting valet patrons will be provided along Old Fort Road between Indian Head Highway and Livingston Road. A secondary access point will be provided along Livingston Road for all employee, delivery and service vehicles and as the exit for self-park patrons. In Phase II, the intersection of Indian Head Highway and Old Fort Road would be grade-separated as proposed in the Route 210 Master Plan. A direct ramp from Indian Head Highway southbound would be provided for patrons entering the site.

Prince George's County Planning Board and the staff of the Transportation Planning Section have established technical standards for the evaluation of the adequacy of transportation facilities. The Traffic Impact Analysis in Section 3 of the *Transportation Review Guidelines – Part 1, 2012*, prepared by The Maryland-National Capital Park and Planning Commission, was used as a reference for evaluating the applicant's Preliminary Traffic Assessment.

3. BACKGROUND

Friday and Saturday evenings are typically the peak hours of activity at a casino. The applicant did not collect traffic data for the weekday morning conditions. Existing condition traffic volumes were collected in the spring of 2013 on a weekday evening (4:00 to 8:00 pm) and Saturday (4:00 to 8:00 pm) at the following four intersections:

- Indian Head Highway and Old Fort Road
- Old Fort Road and Proposed Site Driveway/Livingston Square Shopping Center Driveway
- Old Fort Road/Oxon Hill Road and Livingston Road
- Indian Head Highway and Livingston Road/Palmer Road

The opening year of the project was estimated to be 2016. However, the applicant did not include a future 2016 background traffic growth rate or background projects for when calculating future traffic volumes for Phase I. In addition, a background traffic growth rate or background projects were similarly not included for the full build out year of the project (Phase II). For the future traffic network with the project, the Livingston Road and Site Driveway, Oxon Hill Road and SB MD 210 Ramp, and the Oxon Hill Road and NB MD 210 Ramp intersections were included. Further to the north, the proposed MD 210 at Kerby Hill Road/Livingston Road intersection grade separation is now funded through the Maryland State Highway Administration Consolidated Transportation Program (CTP).

Assessment: The location and number of intersections within the study area appears to be appropriate given the scale of the project and likely paths taken by projected visitors to the site. The applicant uses the hourly volumes recorded on a Friday evening and Saturday which are typically the peak times of activity at a casino. However, they do not include a weekday AM peak hour when background volumes are high. The applicant does not include an annual growth rate coupled with development sites in the area that generate appreciable background traffic. This underestimation of future traffic volumes used in the traffic analysis could minimize potential impacts due to the project.

4. PROJECTED CONDITIONS

4.1 Trip Generation

The Institute of Transportation (ITE) *Trip Generation Manual* is the standard by which traffic volumes are determined for specific land uses. However, empirical data that is available from surveys of analogous sites can be used to supplant the ITE data. Trip rate per gaming position is typically used to determine traffic generation for a casino. In addition, facilities within the casino such as hotel, food and beverage outlets, and retail are dealt with differently depending upon the facility and how the rates were calculated. Some studies have assumed that these facilities are used help to support the gambling operations while others provide a separate trip generation rate for these facilities. The applicant used a comparable existing Pennsylvania casino they currently operate to estimate trip generation for the proposed casino. The peak traffic hours for that regional Pennsylvania casino were identified to be Friday evening from 5:00 to 6:00 pm and Saturday evening from 6:00 to 7:00 pm.

Based on the applicant's proposal, 4,750 slot machines and 170 table games were assumed in the full build out condition. This equates to 5,940 gaming positions if it is assumed that one gaming position equates to each slot machine and there are seven gaming positions for every table game. It was also assumed that the gaming, food and beverage (5 restaurants and 5 bars/lounges), and limited retail outlets were bundled together into the casino trip generation. The weekday PM peak hour vehicle rate of 0.38 x gaming position was used. For the Saturday peak hour, a vehicle rate of 0.29 x gaming position was used which is lower than the weekday PM peak hour vehicle rate. In addition, the 2,680 seat entertainment facility was also included in the casino trip rate.

The number of rooms was used according to ITE *Trip Generation Manual* Land Use Code 310 to determine traffic generation for the 250 room hotel. This yielded vehicle rates of 0.60 x the number of rooms for the weekday PM peak hour, and 0.72 x the number of rooms for the Saturday peak hour.

The applicant estimates the casino will generate approximately 1,593 new vehicle trips during the Friday evening peak hour and approximately 1,215 new vehicle trips during the Saturday evening peak hour for Phase 1. For Phase 2, the casino would generate approximately 2,407 new vehicle trips during the Friday evening peak hour and approximately 1,902 new vehicle trips during the Saturday evening peak hour.

Assessment: The applicant used a comparable existing Pennsylvania casino they currently operate to estimate trip generation for the proposed casino. When developing gaming positions used to determine traffic generation for a casino, the assumption of

one gaming position equating to each slot machine is appropriate. The assumption of seven gaming positions are assigned for every table game is slightly less than the eight that some studies have used. It is counter intuitive that weekday PM peak hour vehicle rate is higher than the Saturday peak hour vehicle rate.

It was also appropriately assumed that the gaming and food and beverage were bundled together to the casino trip generation. However, since the applicant also assumes in the proposal that the entertainment venue is bundled with the casino trip generation, vehicle trips may be understated. The trip rate per room from the ITE *Trip Generation Manual* was appropriately used for the hotel component. The use of separate hotel and casino vehicle trip rates is conservative since some hotel guests frequent the casino.

4.2 Trip Distribution

The applicant assumed the following in Table 1 for trips into and out of the site:

Table 1: Trip Distribution – Parx Casino

Land Use	Direction	Weekday AM	Weekday PM	Saturday Midday
Casino	In	N/A	66%	45%
	Out	N/A	34%	55%
Hotel	In	N/A	51%	56%
	Out	N/A	49%	44%

Assessment: The trip distribution proposed by the applicant appears to be reasonable for the site.

4.3 Network Assignment

According to the applicant, traffic to and from the site (Table 2) would be routed generally:

Table 2: Network Assignment – Parx Casino

Direction	Percentage
North (Capital Beltway)	50%
South (Capital Beltway)	
North (Local)	10%
South (Local)	25%
East (Local)	10%
West (Local)	5%
Total	100%

Assessment: Based on independent market research performed for the Commission, the routing assignment proposed by the applicant does not appear to be reasonable for the site. It appears that the applicant understates the number of patrons that would travel to the site from outside of Prince George’s County using the Capital Beltway and overstates the number of patrons that would travel to the site from the south (20% along Indian Head Highway) and from Prince George’s County. As a result, more vehicles should be travelling north between the site and the Capital Beltway and less to the south.

4.4 Mode Choice

Two Washington Metropolitan Area Transit Authority (WMATA) local bus routes operate in the vicinity of the Parx Casino site. Service could be extended to the proposed casino, and additional bus routes could be implemented to maximize mass transit utilization by casino patrons and employees. However, WMATA would need to find funding to implement these initiatives. The applicant has also presented the potential of a local shuttle bus that they could implement. However, no funding has been committed by the applicant or his initiative.

Assessment: Although transit service is provided to the area around the proposed site, it does not currently serve this site directly. Additional WMATA service to the site would need public funding. The applicant has presented the potential of a local shuttle bus that they could implement but no funding has been committed. Although not contemplated in the traffic analysis presented, these transit initiatives would reduce autos traveling to the site if implemented.

5. ANALYSIS

The Critical Lane Volume (CLV) Methodology is preferred for traffic impact analysis within Prince George's County as per the *Transportation Review Guidelines – Part 1, 2012*. However, the applicant analyzed the four existing and three proposed intersections identified previously using the SYNCHRO software package. Since SYNCHRO is a more robust analysis and considers a lot more factors when calculating intersection performance, its use for this study is acceptable.

The results of the analysis (Table 3) indicate that even with Phase I improvements, the Indian Head Highway and Old Fort Road intersection congestion worsens on all four approaches during the weekday PM period and on two approaches during the Saturday PM period without the Old Fort Road/Indian Head Highway interchange. At the Indian Head Highway and Livingston Road/Palmer Road intersection during Phase I, intersection congestion worsens on two approaches during the weekday PM period and on one approach during the Saturday PM period without the Old Fort Road/Indian Head Highway interchange. In Phases I and II with the Old Fort Road/Indian Head Highway interchange, the Livingston Road/Palmer Road intersection congestion worsens on all approaches during the weekday PM period and on two approaches during the Saturday PM period even with intersection improvements.

Assessment: The methodology used appears to be appropriate since it is more robust than the CLV Method used for traffic impact studies conducted in Prince George's County. Based on the results of the analysis, the effect of the project on area traffic would be extensive. Even with mitigation, congestion at the Indian Head Highway and Old Fort Road intersection worsens during both time periods studied without the grade separation. In addition, the Livingston Road/Palmer Road intersection congestion worsens during both periods analyzed for both Phases I and II with mitigation improvements.

6. PROPOSED IMPROVEMENTS

The applicant has developed roadway improvements to accommodate the proposed site plan. A total of \$10M has been dedicated by to applicant to implement all of the initial improvements. These include developing the two site driveways, widen Livingston Road, intersection improvements at Livingston Road and Old Fort Road/Oxon Hill Road, intersection improvements at Indian Head Highway and Livingston Road/Palmer Road, and intersection improvements at Old Fort Road and Indian Head Highway.

In addition, the applicant has offered to provide a maximum of \$100M in support of a public/private partnership to implement the planned highway improvements for the Indian Head Highway (MD 210) intersections at the Livingston Road/Palmer Road and Old Fort Road. These improvements are viewed as incremental within the applicant's proposal and have been planned, but will not be funded for more than 10 years. The state currently does not have any plans to fund these grade separation projects.

Assessment: The applicant is committed to pay 100% of the \$10M in roadway improvements proposed for Phase I of the project. However, it does not appear that the initial improvements in Phase I mitigate all of the projected impacts. Further, the applicant is seeking a public/private partnership to fund up to \$100M of their funds in planned highway improvements for the Indian Head Highway (MD 210) corridor. These roadway projects are needed to accommodate projected traffic for Phase I and Phase II of the project. Since the state does not have any plans to fully or partially fund grade separations at the Indian Head Highway (MD 210) intersections at Livingston Road/Palmer Road or Old Fort Road, there is no timetable for when or if they get implemented. If these projects are not implemented, Phase I traffic will be problematic and Phase II cannot be implemented.

7. PARKING AND INTERNAL ACCESS

The applicant's submission to the Commission proposes approximately 5,300 parking spaces (Table 4). Most of the parking is to be provided in a multi-level deck.

Table 4: Proposed Parking – Parx Casino

Parking Type	Number of Spaces
General Surface	300
General Garage	5,011
Valet	NA
Handicapped	NA
Employee	NA
Reserved	NA
Total	5,311

The site is relatively small and the internal roadway network is not extensive. There is not a lot of area to queue vehicles entering the parking garage. There is potential for vehicle conflicts on the site. In Phase I, traffic flows would be split so entering patrons and exiting valet patrons would use Old Fort Road between Indian Head Highway and all employee, delivery and service vehicles and exiting self-park patrons would use Livingston Road. In Phase II, a direct ramp

from Indian Head Highway southbound would be provided for patrons entering the site using the proposed grade-separated intersection of Indian Head Highway and Old Fort Road.

Assessment: The main vehicular access into the site is split by driveways on Old Fort Road and Livingston Road in Phase I plus a direct ramp from Indian Head Highway southbound in Phase II. Based on preliminary plans, the small overall size of the site layout may not allow for vehicles to move freely around the site. Based upon the initial layout, it appears that internal site circulation could be an issue. However, this could be addressed as detailed designs are prepared.

8. ADDENDUM

Since the draft report was submitted to the Commission on November 26, 2013, the applicant has responded to questions raised with regard to their proposal by providing clarifications, revised analyses, and new financial commitments. An assessment of the applicant's revised proposal in terms of their Traffic Flow Studies was conducted to incorporate and address the new information provided to the Commission. The results of the assessment are summarized below.

1.1 Background

The location and number of intersections within the study area is appropriate given the scale of the project and likely paths taken by projected visitors to the site. The applicant uses the hourly volumes recorded on a Friday evening and Saturday which are typically the peak times of activity at a casino. However, they do not include a weekday AM peak hour when background volumes are high. The applicant has now included a 1% per year compounded annual growth rate out to 2018 as per Prince George's County to account for background traffic growth in the area. They have also provided a 2018 No Build condition traffic analysis for the five study area intersections for the weekday PM and Saturday peak hours.

1.2 Projected Conditions

The applicant used a comparable existing Pennsylvania casino they currently operate to estimate trip generation for the proposed casino. When developing gaming positions used to determine traffic generation for a casino, the assumption of one gaming position equating to each slot machine is appropriate. The assumption of seven gaming positions are assigned for every table game is slightly less than the eight that some studies have used. The applicant explains that the weekday PM peak hour vehicle rate is higher than the Saturday peak hour vehicle rate because trips are more concentrated in the weekday PM peak hour based on data from their comparable existing Pennsylvania casino.

It was also appropriately assumed that the gaming and food and beverage were bundled together to the casino trip generation. However, since the applicant also assumes in the proposal that the entertainment venue is bundled with the casino trip generation, vehicle trips may be understated. The trip rate per room from the ITE Trip Generation Manual was appropriately used for the hotel component. The use of separate hotel and casino vehicle trip rates is conservative since some hotel guests frequent the casino.

Based on independent market research performed for the Commission, the routing assignment proposed by the applicant does not appear to be reasonable for the site. It appears that the applicant understates the number of patrons that would travel to the site from outside of Prince George's County using the Capital Beltway and overstates the number of patrons that would travel to the site from the south (20% along MD 210) and from Prince George's County. As a result, more vehicles should be travelling north between the site and the Capital Beltway and less to the south.

Although transit service is provided to the area around the proposed site, it does not currently serve this site directly. Additional WMATA service to the site would need public funding. The applicant has presented the potential of a local shuttle bus that they could implement but no

funding has been committed. Although not contemplated in the traffic analysis presented, these transit initiatives would reduce autos traveling to the site if implemented.

1.3 Analysis

The methodology used appears to be appropriate since it is more robust than the CLV Method used for traffic impact studies conducted in Prince George's County. Based on the results of the analysis, the effect of the project on area traffic would be extensive even during Phase I at the MD 210 and Old Fort Road intersection and at the Livingston Road/Palmer Road intersection during both time periods studied without the grade separation. However, this could be offset by measures to mitigate increased traffic in the area through applicant funded improvements at the affected intersections including the construction of grade separated interchanges at the MD 210 and Old Fort Road intersection and the Livingston Road/Palmer Road intersection, direct entrance ramp from southbound MD 210 (bypassing the Old Fort interchange) into the site, and a direct exit ramp from the parking garage to southbound MD 210. Other roadway improvements are also needed to accommodate site generated traffic including the development of the two site driveways, widening of Livingston Road, and intersection improvements at the Livingston Road and Old Fort Road/Oxon Hill Road intersection. With all of these improvements in place, the affected movements would operate at acceptable levels of service during both time periods under Phase I and Phase II conditions (Table 5). Based on the analysis results, the proposed MD 210 interchanges at Old Fort Road and Livingston Road/Palmer Road would significantly add capacity and reduce congestion at these locations as compared with current conditions even with the inclusion of the projected casino traffic.

1.4 Proposed Improvements

The applicant is committed to pay 100% of the \$10M in roadway improvements proposed for Phase I of the project. However, it does not appear that the initial improvements proposed by the applicant in Phase I would mitigate all of the projected impacts. The MD 210 Multi-Modal Study recommends that the MD 210 intersections at Old Fort Road and Livingston Road/Palmer Road be improved into grade separated interchanges. The Federal Highway Administration Maryland Division Office selected Alternative 5A Modified as the preferred alternative as memorialized in the MD 210 Multi-Modal Study Record of Decision (ROD) for the Final Environmental Impact Study (FEIS) and Section 4(f) Evaluation dated September 22, 2004.

According to the approved ROD, "Palmer/Livingston Road Option E consists of a half-diamond interchange on the east side of MD 210, with single-lane ramps in the northeast and southeast quadrants. In the southwest quadrant, a two-lane ramp from MD 210 southbound to Palmer/Livingston Road and a single lane ramp from Palmer/Livingston Road to MD 210 southbound are proposed. The proposed Palmer/Livingston roadway alignment is skewed sharply in relation to MD 210 in order to tie the vertical grade into existing Livingston Road on the west side of MD 210 with as few business displacements as possible. The northwest quadrant contains a proposed access road with retaining walls for the existing businesses along Palmer/Livingston Road. The existing trail along Henson Creek will be reconstructed as necessary to accommodate the widened MD 210 bridge over the trail and Henson Creek, and a new trail connecting the access road to the existing Henson Creek trail will be constructed."

Table 5: Revised Intersection Level of Service Results – Parx Casino

	Existing						No Build						Build Phase 2 - With Interchange					
	PM Peak Hour			Saturday Peak Hour			PM Peak Hour			Saturday Peak Hour			PM Peak Hour			Saturday Peak Hour		
	Ln Grp	LOS	Delay	Ln Grp	LOS	Delay	Ln Grp	LOS	Delay	Ln Grp	LOS	Delay	Ln Grp	LOS	Delay	Ln Grp	LOS	Delay
Indian Head Highway & Old Fort Road																		
Eastbound	L T R	E F D	65.9 118.5 48.7	L T R	E F B	68.6 103.5 19.8	L T R	E F E	67.0 123.3 59.3	L T R	E F C	69.6 105.3 24.1						
Westbound	L T R	F F B	113.2 90.7 11.4	L T R	E F B	78.2 98.2 11.2	L T R	F F B	132.1 92.2 11.2	L T R	E F B	80.9 100.1 11.1						
Northbound	L T R	F C A	98.4 25.2 6.2	L T R	F C A	98.8 27.1 7.2	L T R	F C A	98.2 26.4 6.8	L T R	F C A	99.7 28.8 7.9						
Southbound	L T R	F D A	111.6 40.2 0.3	L T R	F B A	127.1 10.2 0.5	L T R	F E A	108.6 66.7 0.3	L T R	F B A	127.0 11.0 0.5						
Oxon Hill Road & Livingston Road																		
Eastbound	LT R	D B	39.1 10.0	LT R	C A	31.2 5.3	LT R	D B	44.7 10.8	LT R	C A	31.7 5.6	L T R	C D B	20.7 46.1 12.8	L T R	C C A	20.4 26.6 4.5
Westbound	LTR	B	17.4	LTR	B	18.1	LTR	B	18.1	LTR	B	18.1	L TR	C C	34.5 34.9	L TR	B C	14.2 32.1
Northbound	L TR	C B	22.7 17.5	L TR	B B	15.6 15.1	L TR	C B	23.6 17.9	L TR	B B	16.8 15.9	LTR	C	20.5	LTR	B	19.0
Southbound	L TR	D E	37.8 73.1	L TR	C C	30.1 26.3	L TR	D F	40.1 90.3	L TR	C C	33.3 30.1	LTR	C	31.9	LTR	C	20.2
Palmer Road & Livingston Road																		
Eastbound	L TR	F E	125.1 55.8	L TR	F E	160.7 57.3	L TR	F E	135.0 56.3	L TR	F E	174.6 57.3						
Westbound	L T R	F F B	139.2 108.1 12.3	L T R	F E B	119.8 77.2 16.1	L T R	F F B	150.4 117.2 12.3	L T R	F E B	122.7 77.0 18.2						
Northbound	L T R	F E C	88.1 63.7 25.2	L T R	F E C	102.6 63.9 23.3	L T R	F E C	89.7 66.4 26.1	L T R	F E C	113.2 67.8 24.3						
Southbound	L T R	F D B	102.3 36.1 12.4	L T R	F C B	99.9 22.0 10.4	L T R	F D B	103.6 50.3 13.7	L T R	F C B	100.3 23.2 11.0						
Palmer Road & Livingston Road NB																		
Eastbound													L T	B A	17.3 8.0	L T	B A	12.3 9.2
Westbound													T R	C A	33.6 3.9	T R	C A	30.3 5.3
Northbound													LTR	A	9.4	LTR	A	8.3
Palmer Road & Livingston Road SB																		
Eastbound													TR	A	8.7	TR	A	7.5
Westbound													LT	B	10.8	LT	A	8.0
Northbound													LR	C	32.8	LR	C	32.4
Driveway & Oxon Hill Road																		
Eastbound													L T R	B C A	17.8 22.1 4.6	L T R	B C A	19.8 21.9 5.8
Westbound													L T R	C A A	32.2 8.6 2.0	L T R	C B A	26.2 10.3 2.4
Northbound													L R	C B	35.0 12.7	L R	C B	28.5 11.4
Southbound													L TR	C B	25.9 11.0	L TR	C A	20.4 0.1
Driveway & Livingston Road																		
Westbound													LR	C	15.0	LR	B	11.9
Southbound													L	A	8.8	L	A	8.3
Oxon Hill Road & SB Ramp																		
Eastbound													T R	C A	21.4 4.2	T R	C A	20.9 3.8
Westbound													L T	B B	14.3 13.5	L T	B B	12.7 12.5
Southbound													LT R	C A	21.3 5.0	LT R	C A	21.1 5.2
Oxon Hill Road & NB Ramp																		
Eastbound													L T	C A	31.9 8.8	L T	C A	29.2 8.8
Westbound													T R	C A	28.3 4.0	T R	C A	27.6 4.7
Northbound													L TR	C A	31.0 0.6	L TR	C A	25.4 0.5

Note: Potential capacity issues are highlighted

The ROD also states “*Old Fort Road North Option C consists of a diamond interchange at Old Fort Road North. Old Fort Road North will be realigned to the south of the existing intersection and will be comprised of two lanes in each direction crossing over MD 210. The existing service road in the northeast quadrant would be closed with traffic being diverted east to the Broadview Road intersection.*”

Initially, the applicant was seeking a public/private partnership to fund up to \$100M of their funds in planned highway improvements for the MD 210 corridor. These roadway projects are needed to accommodate projected traffic for Phase I and Phase II of the project. Since the state does not have any plans to fully or partially fund grade separations at the MD 210 intersections at Livingston Road/Palmer Road or Old Fort Road, there is no timetable for when or if they get implemented. If these projects are not implemented, Phase I traffic will be problematic and Phase II cannot be implemented.

On December 6, 2013, Chief Executive Officer Tony Ricci of Greenwood Racing (Parx) presented a plan to fully fund the MD 210 grade separation projects at Livingston Road/Palmer Road and Old Fort Road. He also told the Commission that transportation improvements will not be capped at \$200M based on the following statement “[W]e will remove that uncertainty and commit to fund the total cost of this work, with the understanding that, in return for fronting the entire cost, Parx will recoup the contribution that exceeds \$100M through the local impact funding stream that is statutorily dedicated to Route 210 improvements.” The plan is for Parx to follow the concept designs approved as part of the MD 210 Multi-Modal Study. However, Parx has proposed to include a direct entrance ramp from southbound MD 210 (bypassing the Old Fort interchange) into the site and a direct exit ramp from the parking garage to southbound MD 210 at the MD 210 and Old Fort Road interchange.

In addition, the applicant will still be required to fund other roadway improvements needed to accommodate site generated traffic including the development of the two site driveways, widening of Livingston Road, and intersection improvements at the Livingston Road and Old Fort Road/Oxon Hill Road intersection.

As a collateral benefit to the Parx site, the State of Maryland is replacing the existing MD 210 intersection at Kerby Hill Road/Livingston Road with a grade-separated interchange located to the north of the proposed Parx site. The State has identified this project as the top transportation priority for Prince George’s County. Design is under way and is expected to be completed in fall 2014. Right-of-way acquisition either has started or will be starting shortly. Construction is expected to begin in late 2014/early 2015. A total of approximately \$106M (\$6M for design, \$21M for right-of-way acquisition, and \$79M for construction) has been appropriated for this project.

In terms of schedule, the applicant is committed to privately completing the MD 210 interchange projects at Livingston Road/Palmer Road and Old Fort Road in 30 months between January 2014 and July 2016 since the MD 210 Multi-Modal Study received Location Approval, Design Approval, and a ROD for the FEIS. The main activities that need to be completed for the two interchanges during this period will include design, permitting, right of way acquisition, and construction. Through correspondence with the State Highway Administration (SHA), the applicant estimates that the detailed design and permitting would take approximately between 12 and 16 months to complete. During this period, grading permits could be obtained after the traffic impact statement approval is granted and while plan review and approval is being conducted as identified by the SHA. Although a bulk of the Old Fort Road interchange project work would occur on property owned by Parx, the full extent of the complexity and time needed

to conduct right-of-way acquisition for both interchanges is uncertain at this point and could be the source of delays to the project schedule.

Although completion of the interchanges within the projected timeframe (2 ½ years) is plausible, the schedule is very aggressive and does not provide much room for unforeseen delays. The completion of the MD 210 interchanges at Livingston Road/Palmer Road and Old Fort Road are critical for accommodating site generated traffic in both Phases I and II.

1.5 Parking and Internal Access

The main vehicular access into the site is split by driveways on Old Fort Road and Livingston Road plus a direct ramp from Indian Head Highway southbound. Based on preliminary plans, the small overall size of the site layout may not allow for vehicles to move freely around the site. Based upon the initial layout, it appears that internal site circulation could be an issue. However, this could be addressed as detailed designs are prepared.

1.6 Summary

The main takeaways from the applicant's revised proposal include:

- A 1% per year compounded annual growth rate out to 2018 as per Prince George's County to account for area background traffic growth in the analysis.
- Explanation that the weekday PM peak hour vehicle rate is higher than the Saturday peak hour vehicle rate because trips are more concentrated in the weekday PM peak hour based on data from their comparable existing Pennsylvania casino.
- A plan to fund the total cost of the MD 210 grade separation projects at Livingston Road/Palmer Road and Old Fort Road with the understanding that, in return Parx will recoup the contribution that exceeds \$100M through the local impact funding stream that is statutorily dedicated to Route 210 improvements.
- The proposed MD 210 interchange at Old Fort Road will follow the concept designs approved as part of the MD 210 Multi-Modal Study except that Parx has proposed to include a direct entrance ramp from southbound MD 210 (bypassing the Old Fort interchange) into the site and a direct exit ramp from the parking garage to southbound MD 210 at the MD 210 and Old Fort Road interchange.
- Funding for other roadway improvements needed to accommodate site generated traffic including the development of the two site driveways, widening of Livingston Road, and intersection improvements at the Livingston Road and Old Fort Road/Oxon Hill Road intersection.
- With all of the proposed improvements in place, the affected movements would operate at acceptable levels of service during both time periods under Phase I and Phase II conditions.
- Based on the analysis results, the proposed MD 210 interchanges at Old Fort Road and Livingston Road/Palmer Road would significantly add capacity and reduce congestion at these locations as compared with current conditions even with the inclusion of the projected casino traffic.
- Although completion of the interchanges within the projected timeframe (2 ½ years) is plausible, the schedule is very aggressive and does not provide much room for unforeseen delays (especially in terms of right-of-way acquisition).
- The completion of the MD 210 interchanges at Livingston Road/Palmer Road and Old Fort Road are critical for accommodating site generated traffic in both Phases I and II.