



December 14, 2022

The Honorable Brendan Reilly  
Alderman, 42<sup>nd</sup> Ward  
City of Chicago  
121 N. LaSalle Street, Room 200  
Chicago, IL 60602

Re. Traffic Study Feedback / Bally's Temporary Casino Site at Medinah Temple

Dear Alderman Reilly:

Having reviewed the traffic study commissioned by Bally's Corporation for the temporary casino site proposed for Medinah Temple at 600 N. Wabash Avenue, we share your concerns about the reliability of its conclusions.

Based on the experience and expertise of our volunteer board and committee members, we recognize that traffic impact studies project outcomes based on a series of assumptions which may or may not reflect actual conditions upon the completion of the project(s) for which the study was prepared. In this vein, RNRA's high-level feedback of the temporary casino traffic study follows.

- Of the 5,000 garage parking spaces near the temporary casino site, the traffic study reflects the assumption that approximately 848 to 935 parking spaces will be available at peak times based on a limited parking spot count, and that this amount is sufficient to handle the projected peak parking demand of ~500 for the temporary casino. It's unclear from the report whether this number of spaces are actually unrestricted and available for casino parking use.
- The assumptions determining estimates of peak parking demand generated by the temporary casino site may be understated in terms of actual need. The traffic study "estimates that the temporary casino will have a peak parking demand of approximately 500." It's unclear from the report how the consultants arrived at the assumptions such as the following:
  - "60 percent of casino patrons will drive, resulting in 900 patrons arriving by car."
  - "Most of the casino employees will travel by non-vehicular modes, such as transit, walking, and biking, and not require a parking space."
  - "At peak times, it is anticipated that there will be 200 employees on site with only 25 percent driving resulting in additional demand of 50 parking spaces."
- Trip generation to/from the temporary casino site is based on "a review of recent traffic studies . . . for casinos within a similar urban context with nearby transit options to obtain trip rates during the casino peak periods . . . ". Gaming positions will be used as the independent variable to estimate the number of trips generated by the casino for this study. The study does not indicate which "comparable casinos" were used for the analysis.
- We feel the study overestimates the number of patrons and employees who will walk, bike, or take public transit to and from the casino, particularly in view of the current level of serious crime in the area. Considering the high cost of nearby garage parking, and the absence of free, onsite parking common at large casinos, it's likely that many more people will use ride-share, taxis, and charter bus options than the study anticipates. This will worsen congestion, which is already increasing as tourism and commerce gradually move toward pre-pandemic levels.

- Other assumptions where the data sources were not clearly identified, or where other data were not factored into the analysis, or where certain business practices need to be in place to achieve the traffic study outcomes, include the following:
  - “It is assumed that 15% of trips will use rideshare and 5% will use taxis.”
  - “The traffic model does not take into account the residual vehicle queues for each movement from downstream intersections not in the traffic model or additional delays created from double parked vehicles and loading/unloading trucks.”
  - “The following recommendations must be implemented [by the casino operator and/or its contractor] to provide adequate valet operations along Ohio Street:
    - Vehicles arriving for valet drop off or pick up shall not be double-parked, staged, or loaded in/out from any travel lane.
    - Vehicles arriving for valet drop off shall not dwell unattended at the curb for more than 60 seconds.
    - All parking of valet vehicles shall occur in off-street garages/lots. Vehicles shall not be parked or staged by valet attendants at any location on the public way, including but not limited to the street frontages near the site.
    - The valet operator shall develop a monitoring and compliance plan to these terms with regular reporting to the City of Chicago on adherence to these terms. The valet operator shall promptly notify the City of any recurring operational issues including but not limited to queue spillback of vehicles arriving for valet drop off.
    - If the valet operator is found in non-compliance of the conditions, valet operation will be suspended. Adequate opportunity to address the issue(s) will be granted twice before the ability to valet on-street will be revoked.”
    - After unloading patrons, the charter buses could then travel to a City approved charter bus parking area or could also park at the south end of the Tribune Freedom Plaza via Grand Avenue, if allowed.
- Similarly, the following recommendations must be implemented by external entities:
  - The study recommends charter bus routing/staging from the temporary casino site “. . . to the Tribune Freedom Plaza or to I-94 would be westbound Grand Avenue. It is recommended that Bally’s work with the drivers and companies of known bus operators and to provide this information on the casino website.”
  - Additionally, the study’s projected outcomes rely on City “traffic control aides be present on site during the peak casino periods to keep traffic flowing around the site, limit double parking along the roadways . . . and to provide safe and efficient access for casino patrons as well as to limit any roadway impacts to the local businesses and neighborhood . . .”
- Lastly, the study acknowledges that “. . . the operations of taxi and rideshare drop off and pick up trips are challenging to force at a certain location due to driver and patron tendencies. It is likely that rideshare, and taxi patrons will be dropped off or picked up along the adjacent roadways around the Medinah Temple.”



Based on the uncertainty of the actual outcomes, due to the many recommendations of the traffic analysts that require actions by, and resources of, several external entities, RNRA recommends that the Bally's Corporation and all related legal entities bear the responsibility and related costs to implement the traffic recommendations articulated in their commissioned traffic study for the temporary site. We also agree with you about the value of an independent review of the study's assumptions and findings.

We appreciate your consideration of our feedback and recommendations.

On behalf of the River North Residents Association Board,

*Brian Israel*

Brian Israel  
President

Cc:

Alderman Brian Hopkins, 2nd Ward

Alderman Walter Burnett, 27<sup>th</sup> Ward

Alderman Howard Brookins, Chairman, Committee on Transportation and Public Way

Deputy Mayor Samir Mayekar

Commissioner Gia Biagi, Chicago Department of Transportation

Commander Jon Hein, 18<sup>th</sup> District