



18 June 2008

Mr. James N. Boyer, Ph.D.
Biologist
Regulatory Branch
U.S. Army Corps of Engineers
100 Penn Square East
Philadelphia, Pennsylvania 19107-3390

Mr. Mark Shaffer
Archaeologist
PA Historical and Museum Commission
Bureau of Historic Preservation
Commonwealth Keystone Building
2nd Floor
400 North Street
Harrisburg, Pennsylvania 17120-0093

**Re: CENAP-OP-R-2007-120-24
SugarHouse Casino
Request to Proceed with Test Piles and Obstruction Removal**

Dear Messrs. Boyer and Shaffer:

It is A.D. Marble & Company's ("ADM") understanding that HSP Gaming, L.P. has submitted a request to the U.S. Army Corps of Engineers ("USACE") to perform limited activities at the SugarHouse Casino site which will involve earth disturbance. Furthermore, it is ADM's understanding that this request would be limited to the following activities:

1. Test and Indicator Pile Installation; and
2. Obstruction Removal.

The following is a brief description of our understanding of each of the tasks, as well as the anticipated impact on the archaeological resources identified at the site through the date of this letter.

Test and Indicator Pile Installation

It is ADM's understanding that HSP Gaming, L.P. will be installing test and indicator piles at locations "A-1", "A-2" and "A-3" on the attached Figure 1. The soil at the two test pile locations

designated A-1 and A-2 in Figure 1 will be undercut approximately 4 to 6 feet to prepare a surface for the pile driving activity. There will be no undercut necessary for A-3. A total of three test piles each will be installed at A-1 and A-2 as well as piles to support the test loading mechanism. The test piles will consist of 14-inch diameter pipe piles, approximately 60 to 80 feet in length.

The following is an estimate of the approximate area of disturbance associated with the test/indicator piles:

- A-1: Undercut soil from an approximate 50 ft. x 50 ft. area. Three test piles then installed within that area.
- A-2: Undercut soil from an approximate 50 ft. x 50 ft. area. Three test piles then installed within that area.
- A-3: No undercut of soil is required. Approximately 18 indicator piles will be driven from the existing surface. The total area for A-3 is approximately 3 acres; however, only 20 sq. ft. of subsurface disturbance (i.e., 18 times 1.06 sq. ft.) over the entire 3-acre area will actually take place. These piles will also consist of 14-inch diameter pipe piles, approximately 60 to 80 feet in length.

ADM's archaeologists will be on-site as monitors during the initial disturbance of areas A-1 and A-2 to confirm the subsurface conditions in both of these areas are consistent with the findings to date associated with the archaeological investigations. Minimal earth disturbance is anticipated in area A-3, since only one 14-inch diameter pile will be installed at each of the 18 locations, with no undercutting being performed.

It is ADM's opinion that the limited disturbance of soil and driving of the test piles planned by HSP Gaming will have no impact on the archaeological resources identified on the property. Area A-1 has been thoroughly investigated, with no significant archaeological resources determined to be present. Areas A-2 and A-3 are located east of Penn Street, where the investigation activities have confirmed that no significant archaeological resource potential is present. Furthermore, ADM's monitoring of this activity will ensure that no unknown archaeological resources will be impacted by this activity.

Obstruction Removal

It is ADM's understanding that HSP Gaming will be performing obstruction removal throughout the portion of the site that is located east of Penn Street and north of the Laurel Street drainage channel. The area is indicated on the attached Figure 2. Furthermore, it is ADM's understanding that the intent of the disturbance is to investigate the location of underground obstructions associated with the former sugar refinery building (foundations, slabs, basement walls, etc.), and subsequently remove those obstructions. Once the obstructions are removed, the area will be backfilled. HSP Gaming's knowledge of the extent of the obstructions is limited; however, it is currently anticipated that approximately 50 percent of the 8.3 acre designated area could be disturbed in some fashion to investigate and remove obstructions.

ADM's archaeologists will be on-site during the initial disturbance in the designated area to confirm the subsurface conditions are consistent with the findings to date.

It is ADM's opinion that the disturbance of soil associated with the obstruction removal activity will have no impact on the archaeological resources identified at the site. The designated area east of Penn Street has been investigated and it has been confirmed that no resource potential is present. Furthermore, ADM's monitoring of this activity will further ensure that no unknown archaeological resources will be impacted by this activity.

As always, please do not hesitate to contact me or Jason Vendetti, ADM's Project Manager, if we can be of further assistance with this matter.

A.D. Marble & Company

A handwritten signature in black ink that reads "Judson Kratzer for". The signature is written in a cursive, flowing style.

Judson Kratzer, M.A., RPA
Principal Investigator

cc: Terry McKenna, Keating Consulting, LLC

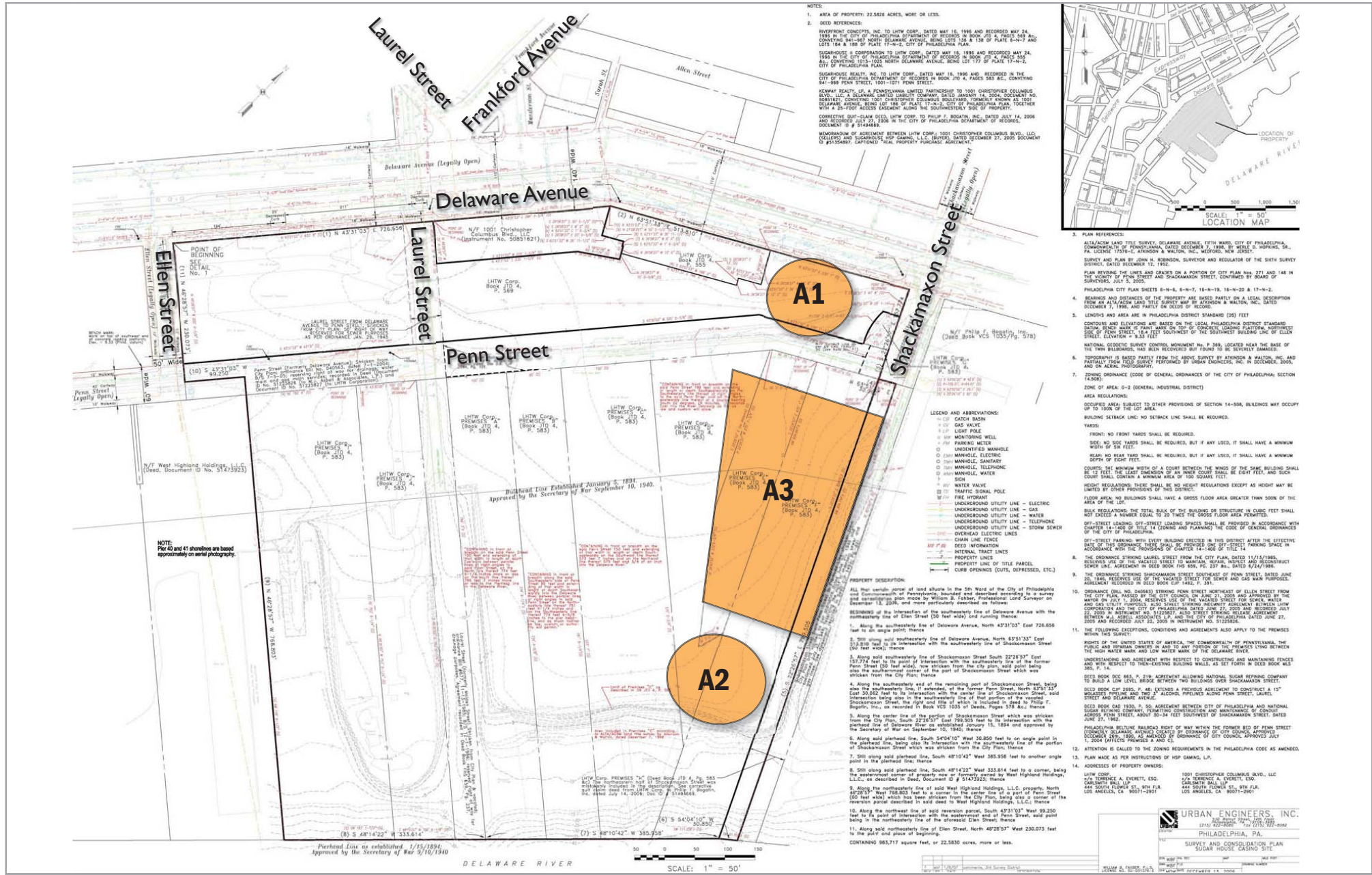


Figure 1
Test and Indicator Pile Installation Locations
 SugarHouse Casino Site
 Philadelphia, Pennsylvania

Source: "Survey and Consolidation Plan, Sugar House Casino Site," Urban Engineers, Philadelphia, PA, December 13, 2006

