

November 15, 2006

Mr. Glenn Rowe, P.E.
Pennsylvania Department of Transportation
Bureau of Highway Safety and Traffic Engineering
Commonwealth Keystone Building
400 North Street, 6th Floor
Harrisburg, PA 17105

RE: Allentown Tropicana Traffic Impact Study
Detailed Traffic Impact Study Review

Dear Mr. Rowe:

McCormick Taylor, Inc. has completed its detailed review of the traffic study submitted for the proposed Allentown Tropicana, located in the City of Allentown. The material reviewed consisted of the following:

- Allentown Tropicana Traffic Impact Study, prepared by Traffic Planning and Design, Inc., revised September 7, 2006.

This detailed review builds upon our initial review, dated July 31, 2006. Consistent with our approved scope of work McCormick Taylor conducted a project site visit; evaluated the technical elements of the traffic analysis; assessed the feasibility of constructing the various transportation improvements proposed in the study; and contacted the PennDOT District office and municipal representatives.

Project Summary

The project site is located on a parcel south of American Parkway, on the existing Agere campus in the City of Allentown, Lehigh County. Aztar-Tropicana is to be developed as a Class II casino, within the urban boundaries of PennDOT District 5-0. Primary access to the gaming facility will be via an existing access to American Parkway opposite the existing Agere Drive and a proposed right-in/right-out access to American Parkway east of the existing access.

The traffic impact study assumed a proposed gaming facility that will include the following specific uses:

- 5,000 slot machine parlor
- 500-room hotel
- Executive conference center and associated facilities

PennDOT and Municipal Coordination

McCormick Taylor contacted Brian Boyer, PennDOT District 5-0 Permits Manager. Mr. Boyer indicated that while PennDOT was very interested in the gaming projects no formal submissions had been made to the District.

McCormick Taylor contacted Michael Hefele with the City of Allentown Planning Department. Mr. Hefele indicated that the applicant had changed traffic consultants and that a revised study was being prepared. He anticipated that the revised study would provide the basis for the City to assess the appropriate transportation improvements associated with the proposed gaming facility.

Site Visit

McCormick Taylor visited the location of the proposed gaming facility and the study area addressed within the applicant's impact study. The following observations were made as part of the site visit:

- Most of the traffic signal installations in the study area appeared to be in good condition.
- Some of the study area intersections appear to have recently been improved.
- Existing cemeteries may constrain improvements at several locations, including the intersection of Airport Road and Lloyd Road; and the intersection of Airport Road and American Parkway.
- Insufficient information was available to adequately assess the potential impacts of proposed improvements to existing utilities; however transportation improvements within urban locations such as the proposed site typically require extensive utility coordination and relocation.



Technical Review of the Traffic Study

Unless specifically identified below, the most current submission by the applicant (Allentown Tropicana Traffic Impact Study, prepared by Traffic Planning and Design, Inc., revised September 7, 2006) has addressed the comments presented in the initial July 31, 2006 review. The following comments have not been addressed:

Approach

1. The study included an evaluation of two peak periods; weekday morning and evening. An evaluation of the Saturday peak period should also be completed.
2. The study did not adequately address impacts to the US Route 22/Airport Road interchange. Evaluations of the interchange merge and weave options, queuing along the ramps and the capacity of the US Route 22 mainline is considered appropriate.
3. The study does include the traffic generated by the minor league baseball stadium proposed adjacent to the proposed gaming facility.



Trip Generation

4. Due to the lack of available data in ITE Trip Generation regarding gaming facilities, the trip generation estimates for the gaming facility were based on data collected at a facility operated by the applicant in Evansville, Indiana.
5. The trip generation associated with the non-gaming uses were assumed to be included as part of the volumes based on the Indiana data.
6. When comparing the trip generation estimates for the five At-large facilities the overall (gaming and non-gaming uses), the peak period trip generation assumed in the study for the Allentown Tropicana project is considerably lower than the gaming components of the other At-large facilities.

Analytical Approach

7. The analyses of intersection operations at several locations are predicated upon the completion of improvements to be made in association with other developments.
8. During the peak period evaluated (weekday evening) the majority of traffic entering the site is assumed to be generated by the proposed baseball facility.
9. The study identifies unacceptable future operations at the following locations without presenting sufficient mitigation measures:
 - Airport Road & Route 22 Eastbound Off Ramps/Catasauqua Road
 - Airport Road & BJ's Warehouse/Off Track Betting
 - Airport Road & Lloyd Street
 - Airport Road & American Parkway



- American Parkway & Agere Way/Site Access
- 10. The study recommends completing a revised traffic analysis following the completion of the Phase I gaming facility (3,000 slot machines), Baseball Stadium and new American Parkway Bridge. A post construction study is strongly encouraged.

Evaluation of the Recommended Improvements

McCormick Taylor evaluated the recommended roadway improvements identified in the Allentown Tropicana Traffic Impact Study. The mitigations measures proposed were reviewed for completeness and adequacy in serving the anticipated additional traffic volumes.

- 11. The study does not propose any physical improvements funded by the applicant beyond those directly related to the site access.
- 12. As previously noted, the study identifies unacceptable future operations at several intersections without presenting sufficient mitigation.
- 13. The study relies on several improvements proposed by other developments. Plans should be in place for the necessary improvements to be completed if these developments and resulting improvements do not move forward.

Highway Occupancy Permit Issues

McCormick Taylor evaluated issues that may impede the issuance of a PennDOT Highway Occupancy Permit (HOP). This investigation included preliminary assessments of apparent issues associated with right-of-way, existing structures, utility conflicts, and the constructability of the roadway improvements suggested in the study. It should be noted that PennDOT District 5-0, without having been provided any materials submitted by the applicant, was unable to provide comments regarding potential permitting issues.

- o The project does not access a state highway and no improvements are proposed to mitigate project impacts; therefore an HOP is not required. PennDOT approval is typically required for the installation and/or modification of traffic signals.

Conclusion

Airport Road approaching Lloyd Street

Based on our review there are still issues that have not been addressed by the information submitted by the applicant. Further consideration of the project impacts would benefit from the applicant:

- Revising the traffic analysis to address previously noted technical deficiencies including expanding the study area and utilizing trip generation assumptions consistent with other At-large applications.
- Developing improvements to provide acceptable operations at locations impacted by project traffic.
- Verification that the improvements by others are proceeding as planned.

I trust that this review will assist PennDOT and the Pennsylvania Gaming Control Board in their evaluation of this application. I am available if you have any questions regarding this review.

Very truly yours,

McCORMICK TAYLOR, INC.



Albert Federico, P.E., PTOE
Senior Traffic Engineer

cc: Paul Resch, PA Gaming Control Board
Paul Archibald, McCormick Taylor