

December 4, 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 - Addendum

Dear Mr. Rowe:

As requested by the Gaming Board, McCormick Taylor, Inc. has reviewed the additional materials submitted for the proposed Allentown Tropicana, located in the City of Allentown. The material reviewed consisted of the following:

- Allentown Tropicana – Phase 1 Traffic Impact Study, prepared by Traffic Planning and Design, Inc., Dated November 8, 2006.

This additional review builds upon our detailed review, dated November 15, 2006. It should be noted that the current study was prepared at the request of the City to address the impacts of a temporary facility with less than the assumed full building and predates our most current review; therefore, previous comments made by McCormick Taylor may not have been specifically addressed.

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. Additional access will be provided to local streets adjacent to the site, including Fenwick Street, Godfrey Street and Fairmont Street.

The Phase 1 Traffic Study assumed an initial yield less than the anticipated build out, as follows:

- 3,000 slot machine parlor (5,000 at build out)
- 250-room hotel (500 at build out)

Following are our comments and findings for the review of the above-referenced submission:

Technical Review of the Traffic Study

Unless specifically identified below, the most current submission by the applicant has addressed the comments presented in the previous reviews. 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. As previously noted, the trip generation estimates for the Allentown Tropicana project are generally lower than for the other at-large facilities; however this can be attributed in part to the assumed complete integration of the hotel use with the gaming facility.

Analytical Approach

5. The analyses of intersection operations at several locations are predicated upon the completion of improvements to be made in association with other developments.
6. During the peak period evaluated (weekday evening) the majority of traffic entering the site is assumed to be generated by the proposed baseball facility.
7. 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

Evaluation of the Recommended Improvements

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

8. The study does not propose any physical improvements funded by the applicant beyond those directly related to the site access.
9. As previously noted, the study identifies unacceptable future operations at several intersections without presenting sufficient mitigation.
10. 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.

Conclusion

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:

- 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