

November 22, 2006

Pennsylvania Gaming Control Board  
Attention Mr. Frank T. Donaghue  
Chief Counsel, PGCB  
P. O. Box 69060  
Harrisburg, PA 17106-9060

Dear Mr. Donaghue:

Re: Crossroads Gaming Resort and Spa  
Straban Township, Adams County, PA  
**DETAILED TRAFFIC ASSESSMENT REVIEW - RESPONSE**

Thank you for providing me with a copy of the McCormick Taylor detailed traffic assessment review letter dated November 15, 2006. I offer the following comments for your and the PGCB's consideration:

**PennDOT and Municipal Coordination** – We are pleased that McCormick Taylor cites the close coordination that has taken place between Crossroads, PennDOT, and Straban Township. The resulting access plan incorporates all PennDOT and Township recommendations. We will re-engage with PennDOT and the Township to further coordinate Crossroads access design with the proposed US Route 15/US Route 30 interchange SPUI improvement once the SPUI project proceeds to final design. We fully agree with the McCormick Taylor statement that: “It is imperative that operations at the US Route 15/US Route 30 interchange...should not be negatively impacted or complicated by the project traffic and/or access.” A negative impact would be as detrimental to the Crossroads development as it would be to traffic at large.

**Site Visit** – We concur on the need to relocate utilities which are in the widened US Route 30 right of way. Crossroads has agreed to provide shuttle bus service, so that the need for pedestrian accommodations along US Route 30 and across the access intersections will be reduced.

**Technical Review of the Traffic Study**

**Approach** – Once the SPUI project final design commences, Crossroads will do a Synchro analysis to study merge and diverge operations as well as a weave analysis.

**Trip Generation** – From our limited review of traffic data that the PGCB has made available on-line, we concur with the following McCormick Taylor observation: “When comparing trip generation estimates for the gaming component of the five at-large facilities, the trip generation for Crossroads is in-line with the average of all at-large projections.”

**BENATEC ASSOCIATES**  
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**Analytical Approach** – Regarding the question about traffic volume at the Saturday Opening Day, Crossroads has agreed to perform a traffic study once the Resort opens and sponsor additional traffic improvements, if needed, to achieve the planned Levels of [Traffic] Service. We also noted that several traffic volumes were mislabeled on certain figures in the Study, although we used the correct volumes in the analysis. In the event that one or more of the planned developments in the US Route 30 Corridor do not come to fruition, Crossroads pledges to revise the Study to determine what improvements would be needed for Crossroads traffic without these developments, then implement these improvements.


**Evaluation of the Recommended Improvements** – Regarding Item 7, once the SPUI final design commences, Crossroads will review the proposed design to determine if the proposed widening improvements are feasible and if additional improvements are feasible. Regarding Item 8, Crossroads will have plans in place to build necessary US Route 30 improvements in the event that the improvements of other planned developments do not come to fruition. Regarding Item 9, we would defer to the Township to select which elements of the Township's Capital Improvement Plan will be funded by the Impact Fees paid by Crossroads. Regarding Item 10, Crossroads has committed to staggered employee work hours and to sponsoring shuttle bus service, and it will pursue other congestion management strategies as well. Regarding Item 11, Crossroads will perform a post-construction traffic study. Regarding Item 12, we note the following McCormick Taylor comment: "Except as noted above, it appears that the proposed improvements adequately mitigate the project impacts based on the results presented in the analysis."

**Highway Occupancy Permit (HOP) Issues** – Crossroads is in direct contact with PennDOT District 8-0, and we will respond to the McCormick Taylor comments regarding the HOP, as well as those of PennDOT.

**Conclusions** – Summarizing prior points, the McCormick Taylor letter lists six (6) conclusions. We do not take exception to any of these conclusions. Once the SPUI final design commences and the Crossroads gaming license is issued, we are confident that all of these items can be addressed to PennDOT's and the Township's satisfaction.

Sincerely,

BENATEC ASSOCIATES

  
James I. Scheiner, P.E.  
Chairman

JIS/b

cc: David M. Levan, Battlefield Harley-Davidson  
Nicholas Casiello, Jr., Esq., Fox Rothschild LLP  
Jeffrey A. Ernico, Esq., Mette, Evans & Woodside