

November 29, 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: Mount Airy Lodge 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 Mount Airy Lodge, located in Paradise Township, Monroe County. The material reviewed consisted of the following:

- Letter prepared by Transportation Planning and Design, Inc., dated November 20, 2006, responding to the Detailed Review Comments, dated November 15, 2006.
- Correspondence between Transportation Planning and Design, Inc. and PennDOT District 5-0, comprised of five letters and two transmittals, dated from May 26, 2005 to November 7, 2006.

This additional review builds upon our detailed review, dated November 15, 2006.

Project Summary

The project site is located east of Woodland Road on the former site of the Mount Airy Lodge Resort in Paradise Township, Monroe County. Access to the gaming facility will be provided via two new driveways that intersect Woodland Road. Mount Airy Lodge Redevelopment will be developed as a Class II casino, outside of the urban boundaries within PennDOT District 5-0.

The traffic assessment assumed the redevelopment of the Mount Airy Lodge which will include the following specific uses:

- 3,000 slot machines
- 200 Room Hotel

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

PennDOT Coordination

Correspondence provided by the applicant indicates that the local PennDOT District has had the opportunity to complete preliminary reviews of the traffic study and several of the proposed improvements. A formal submission for PennDOT approval of proposed improvements was made earlier this month.

Technical Review of the Traffic Study

Unless specifically identified below, the most current submissions by the applicant have addressed the comments presented in the previous reviews. The following comments have not been addressed:

Approach

1. The revised study does not address the following intersections, which are each anticipated to serve approximately 10 percent of the assumed project traffic:
 - (a) Bowman Road and Swiftwater Road
 - (b) PA Route 611 and PA Route 715
 - (c) PA Route 715 and I-80 Ramps (Exit 299)

The omission of intersections (b) and (c) appear consistent with the minutes of the PennDOT scoping meeting; however based on the criteria established intersection (a) should be evaluated.

Trip Generation

2. As previously noted, the trip generation estimates for the Mt. Airy Lodge project are generally lower than for the other at-large facilities; however this can be attributed in large part to the lower number of slot machines (3,000) assumed for this facility.

Analytical Approach

3. The number of other planned developments included in developing future traffic volumes appears excessive, particularly considering the marginal volume of traffic anticipated to be added to the study area by several of the developments.
 - The PennDOT correspondence does not address the inclusion of these developments and the applicant's response does not address the inclusion of several projects that add less than 10 trips to any movement throughout the study area (i.e. Tall Oaks and Stroudsburg School).
 - PennDOT, consistent with its' current standards, has directed the applicant to mitigate deficiencies resulting from the addition of project traffic after

considering the traffic generated by other developments. The impacts of this “background” traffic result in several intersections operating in a deficient manner without requiring full mitigation by the applicant.

4. The evaluation of the Woodland Road/Western Site Driveway intersection does not include the Employee Parking Driveway approach.

Evaluation of the Recommended Improvements

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

5. The proposed “interim” improvements to PA Route 611 and I-80 (Interchange #298), specifically the conversion of the existing center turn lane into a second northbound lane may adversely impact access to existing properties. Additionally, the most current review by PennDOT indicates that this proposal is not acceptable.
6. Except as noted above, it appears that the proposed improvements adequately mitigate the project impacts based on the results presented in the analysis. It should be noted that the relatively low trip generation assumptions (as noted above) may be influencing the reported results.

Conclusions

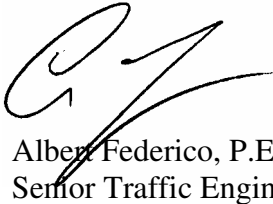
Based on our review there are still issues that have not been addressed by the information submitted by the applicant. Further consideration of the project impacts would benefit from the applicant:

- Revising the traffic analysis to expand the study area.
- Considering of alternatives to the current improvements proposed for the intersection of PA Route 611 & I-80 Ramps (Interchange #298).
- Ensuring that the proposed accesses adequately accommodate pedestrian traffic from the employee parking area opposite Woodland Road.

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