



November 21, 2006

MATZ0602

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501 Broadway, Suite 201
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Attention: Mr. Don Shiffer, Asst. General Counsel
Pennsylvania Gaming Control Board

Re: Pocono Manor Resort & Casino Traffic Impact Study Comments

Dear Bob and Guy,

In accordance with the Pennsylvania Gaming Control Board (PGCB) letter dated November 16, 2006, we offering the following responses to the McCormick Taylor letter to Mr. Glenn Rowe of PennDOT dated November 15, 2006:

Technical Review of the Traffic Study

Approach

1. *The study did not adequately address impacts to the I-380/PA 940 and PA 940/PA 314 interchanges. Evaluations of the interchange merge and weave operations, queuing along the ramps and the capacity of the I-380 mainline is considered appropriate.*

The Pocono Manor Resort & Casino Traffic Impact Study revised November 2006, which was forwarded to PGCB last week, addresses the impacts to both interchanges to the extent deemed necessary by PennDOT District 5-0 and FHWA. Correspondence and meeting minutes on the matter are included in Appendix M of the study.

2. *The study did not address impacts resulting from the proposed closure of the access to the Stillwater Estates residential development as part of the proposed interchange modifications. Expanding the study area to include the roadways and intersections affected by the diversion, quantifying the diverted traffic, and evaluating its effect on the affected streets and intersections would be considered appropriate.*

The Pocono Manor Resort & Casino Traffic Impact Study revised November 2006 addresses the impacts. A letter from the attorney representing Stillwater Estates outlining the conditions by which the community would be willing to relocate their access is included in Appendix M of the study. We believe the conditions are reasonable and viable. The proposed relocation only impacts traffic patterns at the

PA 940/Long Pond Road intersection. The Stillwater Estates traffic has been appropriately redistributed about the intersection.

- 3. The study did not address impacts resulting from the proposed closure of the connection between Old Route 940 and the PA Route 940/PA Route 314 interchange. Expanding the study area to include the roadways and intersections affected by the diversion, quantifying the diverted traffic, and evaluating its effect on the affected streets and intersections would be considered appropriate.*

The Pocono Manor Resort & Casino Traffic Impact Study revised November 2006 addresses the impacts. Since PennDOT and FHWA will not permit the Frontage Road concept on the north side of PA 940 as presented in the July 2006 study, the concept plans in the November 2006 show a right-in/right out access to PA 4009. PA 4009 traffic desiring to travel east on either PA 940 will use Summit Avenue to PA 940. PA 4009 traffic seeking to travel east on PA 314 will use Summit Avenue to Spruce Street to PA 940 West to PA 314 which would add approximately ½ mile to the trip. Analyses of the PA 940/Spruce Street and PA 940/Summit Avenue intersections are included in the November 2006 study.

Trip Generation

- 4. When comparing trip generation estimates for the gaming component of the five at-large facilities, the trip generation for the Pocono Manor facility is considerably higher than the projections for other at-large facilities.*

Upon review of the Traffic Impact Studies available on PGCB's website for the other at-large facilities, it appears the majority based their trip generation rates on either traffic counts taken at "racino" facilities or various assumptions on patronage. The Pocono Manor Resort & Casino Traffic Impact Study uses an article on trip generation rates at five casino facilities in the Midwest which was published in the ITE Journal. In addition, unlike the other at-large facilities, Pocono Manor Resort & Casino Traffic Impact Study is accounting for future growth of the casino should the gaming laws be amended.

Analytical Approach

- 5. No calculations or other information was provided to support the assumed distribution of project traffic.*

The Pocono Manor Resort & Casino Traffic Impact Study revised November 2006, which was forwarded to PGCB last week, includes documentation on gravity models developed for both the casino and retail uses.

- 6. The site plan shows connections to Sullivan Trail (SR 4004) and Manor Drive. However, site traffic does not appear to have been assigned to these roads.*

The connection to Sullivan Trail will be a restricted minimum use access for maintenance and emergency use only. Manor Drive is a local road serving only the community of Pocono Manor.

7. *The study did not provide evaluations of vehicle queuing and determinations regarding the adequacy of existing turn bays.*

The Pocono Manor Resort & Casino Traffic Impact Study revised November 2006 includes this information.

8. *Traffic volumes were not balanced between some study area intersections where volume balancing would be appropriate, particularly along the limited-access sections of PA Route 940 from Long Pond Road to Oak Street.*

Since the PA 940/Spruce Street and PA 940/Summit Avenue intersections were counted one year after the other study intersections, it is impractical to balance the volumes at these intersections with those at the others. Balancing in the Pocono Manor Resort & Casino Traffic Impact Study revised November 2006 was therefore conducted from Long Pond to PA 314 and from Spruce to Summit. The Traffic Impact Study will be revised to reflect balancing from Industrial to Oak.

9. *The Synchro software default values for several critical inputs were used without qualification in all traffic analyses. The use of software defaults, rather than values measured and/or collected in the field, can significantly influence the results of the capacity analyses.*
 - *Peak Hour Factors – The software default of 0.92 was used for all capacity analyses. This parameter should be calculated directly from the traffic count data.*
 - *Lane Widths – The software default of 12 feet was used for all capacity analyses. This parameter should be measured in the field.*
 - *Heavy Vehicle Percentage – The software default of 2 percent was used for all capacity analyses. This parameter should be calculated directly from the traffic count data.*

Due to the volume of site traffic being added between PA 314 and I-380, a peak hour factor of 0.92 and Heavy Vehicle Percentage of 2% is warranted for all approaches along this corridor except Long Pond. For Long Pond and the remaining intersections, the Traffic Impact Study will be revised to use Peak Hour Factors from the traffic count data and Heavy Vehicle Percentages from data on PennDOT's iTMS website.

The Pocono Manor Resort & Casino Traffic Impact Study does not nor has it ever used the 12-foot default for Lane Widths. McCormick Taylor has conceded in a telephone conversation that this comment was made in error.

10. *Several operational parameters of the studied traffic signals (e.g., Recall Mode and Minimum Green Time) do not appear to have been programmed into the capacity*

analysis according to the approved signal plans. Improper signal programming can significantly influence the results of the capacity analysis.

The Traffic Impact Study will be revised as necessary.

- 11. The analyses of the PA Route 611/PA Route 314 (Western Leg) intersection should evaluate the northbound approach with one left-turn lane and two through lanes.*

The Pocono Manor Resort & Casino Traffic Impact Study revised November 2006 includes this information.

Evaluation of the Recommended Improvements

- 12. Significant modifications are proposed to the two interchanges of I-380/PA Route 940 and PA Route 940/PA Route 314; however the interchange of I-380/PA Route 940 is projected to operate with deficient levels of service during post-development conditions.*

The Pocono Manor Resort & Casino Traffic Impact Study revised November 2006 includes design revisions that have no movement at the interchange operating at less than LOS E through the year 2019. The No Build condition will have several movements at LOS F.

- 13. The modification to the I-380/PA Route 940 interchange include aligning the I-380 South off-ramp with existing Long Pond Road, eliminating two closely spaced intersections. This modification would most likely involve closing existing access to the Stillwater Estates residential development. As previously noted the impact of this closure has not been assessed.*

The Pocono Manor Resort & Casino Traffic Impact Study revised November 2006 addresses the impacts. A letter from the attorney representing Stillwater Estates outlining the conditions by which the community would be willing to relocate their access is included in Appendix M of the study. We believe the conditions are reasonable and viable. The proposed relocation only impacts traffic patterns at the PA 940/Long Pond Road intersection. The Stillwater Estates traffic has been appropriately redistributed about the intersection.

- 14. The modification to the two interchange includes a proposed frontage road. This modification would most likely involve closing the connection between Old Route 940 and the PA Route 940/PA Route 314 interchange. As previously noted the impact of this closure has not been assessed.*

The Pocono Manor Resort & Casino Traffic Impact Study revised November 2006 addresses the impacts. Since PennDOT and FHWA will not permit the Frontage Road concept on the north side of PA 940 as presented in the July 2006 study, the concept plans in the November 2006 show a right-in/right out access to PA 4009. PA 4009 traffic desiring to travel east on either PA 940 will use Summit Avenue to PA 940. PA 4009 traffic seeking to travel east on PA 314 will use Summit Avenue to

Spruce Street to PA 940 West to PA 314 which would add approximately ½ mile to the trip. Analyses of the PA 940/Spruce Street and PA 940/Summit Avenue intersections are included in the November 2006 study.

15. *The report indicates that traffic signals are warranted at several unsignalized intersections. However, documentation of the signal warrant analysis is not provided in the report.*

The Pocono Manor Resort & Casino Traffic Impact Study revised November 2006 includes this information.

16. *At the following study area intersections, the traffic impacts of the site were not acceptably mitigated:*

- *PA Route 940/Long Pond Road/Relocated I-380 South Ramps*
- *PA Route 940/I-380 North Ramps*
- *PA Route 940/PA Route 611/PA Route 196 ("Five-Points")*
- *PA Route 611/PA Route 314 (Western Leg)*

The Pocono Manor Resort & Casino Traffic Impact Study revised November 2006 includes design revisions that have no movement at the I-380 interchange operating at less than LOS E through the year 2019. The No Build condition will have several movements at LOS F.

As for the PA Route 940/PA Route 611/PA Route 196 Five Points intersection in Mount Pocono, Pocono Manor Investors, LP is willing to work with the Mount Pocono Borough to address the level-of-service drops. The Borough is currently constructing improvements to add capacity at these intersections. These improvements were assumed in place for the No Build conditions. Existing topography in the area of "Five Points" limits the ability to add any further capacity without a complete reconfiguration of the intersections. Previous estimates for this type of improvement were at \$20 million. For the amount of traffic Pocono Manor Resort & Casino will add to these intersections, we believe payment of a traffic impact fee to the Borough is appropriate.

With the correction discussed under Comment #11, no movement at the PA Route 611/PA Route 314 (Western Leg) operates at less than LOS D through the year 2019. The No Build condition will have several movements at LOS F.

17. *The applicant has proposed paying a "traffic impact fee" to Mount Pocono Borough, in lieu of making improvements to "Five-Points".*

As mention under Comment #16, Pocono Manor Investors, LP is willing to work with the Mount Pocono Borough to address the level-of-service drops.

18. *Except as noted above, it appears that the proposed improvements adequately mitigate the project impacts based on the results presented in the analysis.*

No response necessary.

Highway Occupancy Permit (HOP) Issues

In response to McCormick Taylor's comments on HOP Issues, we offer the following:

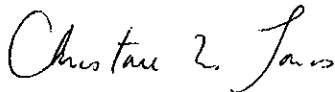
- We acknowledge that the improvements proposed for the I-380/PA Route 940 interchange will require widening of the interchange bridge structure over the I-380 mainline.
- We acknowledge that the signal proposed for PA Route 611 and PA Route 314 (Western Leg) must accommodate the limited sight distance resulting from the approach geometry.
- FHWA has indicated that a Point-of-Access study is not required for the proposed modifications at the I-380/PA Route 940 interchange. FHWA is currently reviewing the November 2006 Traffic Impact Study and concept plans. Since the proposed concept does not result in a configuration change to the interchange, FHWA involvement in the review process will be limited and is not expected to slow design approval.
- Due to the extent of the proposed improvements, PennDOT has indicated that NEPA requirements will have to be met prior to issuance of the HOP for the Full Build condition.

It is important to note that none of the above HOP issues has bearing on the issuance of the HOP for the Temporary Casino.

We have completed the necessary revisions to the Traffic Impact Study as noted above. Enclosed are printed copies of the revised sections of the Traffic Impact Study for replacement in the most recently submitted report. Also enclosed are CDs containing the complete revised Traffic Impact Study in PDF format. If you have any questions or require additional information, please call me at (610) 231-0600.

Very truly yours,

PENNONI ASSOCIATES, INC.



Christine M. Taras, P.E.
Transportation Division Manager

cc: File
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