

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, 6<sup>th</sup> Floor  
Harrisburg, PA 17105

RE: Pocono Manor Resort & Casino 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 Pocono Manor Resort and Casino, located in Tobyhanna Township, Monroe County. The material reviewed consisted of the following:

- Pocono Manor Resort & Casino Traffic Impact Study, prepared by Pennoni Associates, Inc., dated December 2005, last revised November 2006
- Traffic Impact Study for the Temporary Casino at Pocono Manor Resort & Casino, prepared by Pennoni Associates, Inc., dated October 2006
- Letter prepared by Pennoni Associates, Inc. dated November 21, 2006, responding to Detailed Review Comments, dated November 15, 2006.

This additional review builds upon our detailed review, dated November 15, 2006. It should be noted that a revised version of the November 2006 study for the full facility has been submitted to PennDOT within the last week. *The revised materials are not addressed by this review.*

### **Project Summary**

The project site is located in the southwest quadrant of the interchange of Interstate 380 and PA Route 940 in Tobyhanna Township, Monroe County. Access to the gaming facility will be obtained via two driveways onto PA Route 314, the second of which involves the relocation of Sullivan Road (PA Route 4007). A single driveway to PA Route 314 and relocated Sullivan Road will provide access to the temporary facility. The Pocono Manor Resort & Casino will be developed as a Class II gaming facility, outside of the urban boundaries within PennDOT District 5-0.

The full study considered the resort development to be known as Pocono Manor Resort & Casino, which would include the following:

- 8,000 slot machines
- 831,200 square foot indoor shopping center
- 50,000 square foot professional office building
- 475 residential condominiums/townhouses

The study for the temporary facility included only 1,500 slot machines.

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

### **PennDOT Coordination**

Formal submission for PennDOT approval of the proposed access for the Temporary Facility was made earlier this month.

### **Technical Review of the Traffic Studies**

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 studies provide additional information regarding the I-380/PA 940 and PA 940/PA 314 interchanges; however the capacity of the I-380 mainline was not considered.
2. The revised study for the full facility 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 affect on the study streets and intersections would be considered appropriate. It should be noted that the applicant has provided correspondence with a representative of the homeowners association; however, it appears there are still unresolved issues.
3. The revised study for the full facility did address impacts resulting from the proposed closure of the connection between Old Route 940 and the PA Route 940/PA Route 314 interchange; however, the Township has expressed concern over the anticipated diversion of traffic to Spruce Street.

### Trip Generation

4. As previously noted, the trip generation estimates for the Pocono Manor project are higher than for the other at-large facilities; however this can be attributed in large part to the high number of slot machines (8,000) assumed for this facility.

### Analytical Approach

5. The revised studies do provide evaluations of vehicle queuing; however it appears that under full development queuing from the southern, signalized egress will extend well into the site obstructing internal circulation.
6. The study for the temporary facility indicates several intersections where project impacts will not be fully mitigated.
7. The full facility will generally double the volume of traffic utilizing I-380 mainline, however the study does not evaluate mainline operations.
8. The study for the full facility identifies several intersections, particularly along PA Route 940 east of PA Route 314, where project impacts will not be fully mitigated.
9. The analysis of the full facility indicates that the site accesses will have movements operating at deficient levels of service.

### **Evaluation of the Recommended Improvements**

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

10. 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 with the improvements.
11. The modifications 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 involve closing the existing access to the Stillwater Estates residential development. As previously noted the impact of this closure has not been assessed.
12. While improvements are proposed for PA Route 940/Long Pond Road/Relocated I-380 South Ramps the intersection will not operate in an acceptable manner.
13. The applicant has proposed paying a “traffic impact fee” to Mount Pocono Borough, in lieu of making improvements to “Five-Points”.
14. Except as noted above, it appears that the proposed improvements adequately mitigate the project impacts based on the results presented in the analysis.

## Conclusions

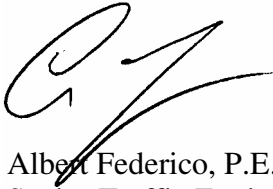
Based on our review there are still issues that have not been addressed by the information submitted by the applicant. Further consideration of the project impacts would benefit from the applicant:

- Developing improvements to mitigate project impacts at off-site intersections and ensuring acceptable operations at the proposed site accesses.
- Advancing the design and environmental assessments associated with the proposed modifications of the two highway structures: PA Route 940 over the I-380 mainline and PA Route 940 over PA Route 314.

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