

November 15, 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: Crossroads Gaming Resort and Spa
Detailed Traffic Assessment Review

Dear Mr. Rowe:

McCormick Taylor, Inc. has completed its detailed review of the traffic study submitted for the proposed Crossroads Gaming Resort and Spa, located in Straban Township, Adams County. The material reviewed consisted of the following:

- Traffic Impact Study for Crossroads Gaming Resort and Spa, prepared by Grove Miller Engineering, Inc., revised date August 2006.
- Letter responding to Initial McCormick Taylor Review comments, prepared by Mette, Evans & Woodside, dated October 12, 2006.

This detailed review builds upon our initial review, dated July 31, 2006. Consistent with our approved scope of work McCormick Taylor conducted a project site visit; evaluated the technical elements of the traffic analysis; and assessed the feasibility and safety of constructing the various transportation improvements proposed in the study. PennDOT District offices and local municipalities were also contacted to receive their comments on the proposed gaming facilities.

Project Summary

The project site is located north of and adjacent to US Route 30, just east of the US Route 15 interchange in Straban Township, in Adams County. Access to the site is proposed via four locations which connect to US Route 30. The primary access across the Gateway Gettysburg roadway is proposed to be an entrance only. Smith Road is proposed to be realigned opposite of Cavalry Field Road and provide full access and accommodate bus and truck traffic. Two right-in/right-out only accesses are proposed; one east and one west of the primary access. The Crossroads Gaming Resort will be developed as a Class II gaming facility, outside of the urban boundaries within PennDOT District 8-0.

The traffic impact study assumed a proposed gaming facility that will include the following specific uses:

- 3,000 slot machines (Opening, expanded to 5,000 at Buildout)
- 225 room hotel (Opening, expanded to 350 at Buildout)
- 30,000 square foot spa

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

PennDOT and Municipal Coordination

McCormick Taylor contacted Scott Nazar, PennDOT 8-0 Traffic Unit. Mr. Nazar stated that the Department has reviewed the Traffic Impact Study for the Crossroads Gaming Resort & Spa and noted the following:

- The reconfiguration of the site access was strongly encouraged. The current proposal of four access points with the exclusive entrance only access at the Gateway Gettysburg roadway will better serve the traffic demands at the site and will provide more efficient traffic operations along U.S. Route 30.
- It is imperative that operations at the US Route 15/US Route 30 interchange (in either its current or proposed “Single Point Urban Interchange (SPUI)” configuration) should not be negatively impacted or complicated by the project traffic and/or accesses.
- The District has been very involved in establishing the trip generation rate used for the applicants study.

McCormick Taylor contacted Robert Coleman at Straban Township. Mr. Coleman referred McCormick Taylor to Jodie Evans of McMahan Associates, Inc., the Township Traffic Engineer reviewing the proposed facility. Ms. Evans stated that a review of the Traffic Impact Study for Crossroads Gaming Resort & Spa was completed (a copy was provided to McCormick Taylor) and noted the following:

- The study changed significantly from the December/March submission, especially the site access.
- A weave analysis is still needed for the operations between the right-in/right-out access (serving the hotel/spa parking garage) located between the primary access and the US Route 15/US Route 30 interchange.
- The District and the Township have been very involved in the review process. The trip generation was discussed in great length and after reviewing ITE articles and other approaches; a derivation of the Charles Town trip generation was accepted.

Site Visit

McCormick Taylor, accompanied by Mr. Nazar, visited the location of the proposed gaming facility and the study area addressed within the applicant's impact study. The following observations were made as part of the site visit:

- Most of the traffic signal installations in the study area appeared in good condition, with several having been installed within the last five years.
- Utilities were observed on the north side of US Route 30. Several, including overhead electrical wires, sewer, and water, would most likely need to be relocated as part of any widening of US Route 30.
- Pedestrian accommodations will need to be addressed both along US 30 and at the site intersections.
- Concern was noted about the proposed right-in/right-out access located west of the primary site access. The close proximity to the adjacent interchange could have an adverse impact on interchange operations.



Technical Review of the Traffic Study

The applicant provided limited materials in response to the initial July 31, 2006 review. As such, the previous comments are generally considered outstanding. It should be noted that the applicant's most current submission (Revised Traffic Impact Study for Crossroads Gaming Resort & Spa, dated August 2006) was prepared for submission to the Township and local PennDOT District. The following comments have not been addressed:

Approach

1. The study did not include an assessment of interchange merge and diverge operations (only traffic signal operations were reviewed) or a weave analysis for the roadway section between the western right-in/right-out access and the interchange.



Trip Generation

2. Due to lack of available data in ITE Trip Generation regarding gaming facilities, the trip generation estimates for the gaming facility were based on the methodology provided in the “Traffic Impact Study for Penn National Race Course Expansion,” prepared by Traffic Planning & Design, Inc. September 2004. A detailed memorandum on the trip generation derivation was prepared and concurrence on the methodology was received from the PennDOT District and McMahan Associates, the Township’s traffic engineer.
3. 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.

Analytical Approach

4. Several inconsistencies were noted between the trip generation projections, figures and analyses for the Saturday peak under Opening Day conditions. Specifically, it appears that a volume of entering traffic was underestimated in the capacity analyses for the period specified.
5. Several volumes appear to be mislabeled in the figures (i.e. Figure 4 - Eastbound US Route 30 right-turn movement at the US Route 15 southbound ramps; and Figure 10a - Eastbound US Route 30 through movement at the US Route 15 northbound ramp); however, the appropriate volumes were used in the analysis.
6. Achieving acceptable operations at several locations is predicated upon the completion of improvements to be made in association with other developments.

Evaluation of the Recommended Improvements

McCormick Taylor evaluated the recommended roadway improvements identified in the Traffic Impact Study for Crossroads Gaming Resort and Spa. The mitigations measures proposed were reviewed for completeness and adequacy in serving the anticipated additional traffic volumes.

7. The report notes that the modifications to the proposed US Route 30/US Route 15 Single Point Urban Interchange would require lane widening to accommodate 2018 traffic volumes at a level of service (during the Saturday evening peak) below the projected No-build conditions. The proposed interchange design should be reviewed to determine if the proposed widening improvements are feasible and if additional improvements are feasible to achieve operations comparable to No-build conditions.

8. Several improvements needed to mitigate the impacts of the Crossroads Gaming Resort and Spa traffic are 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.
9. The study does not propose any physical improvements funded by the applicant beyond those directly related to the site access. The applicant will be subject to the payment of Township Impact Fees; however no information has been provided to indicate which elements of the Township's Capital Improvement Plan would be funded with these fees.
10. The report discusses the implementation of congestion management opportunities available to Crossroads Gaming Resort and Spa that could reduce vehicular traffic in the area. The implementation of these measures is encouraged in order to maintain the quality of traffic flow on the roadway network.
11. In the October 12th response letter, it was noted that a traffic study would be conducted during the initial operations of the gaming facility to assure adequate mitigation measures were implemented. A post construction study is strongly encouraged.
12. 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 Issues

McCormick Taylor evaluated issues that may impede the issuance of a PennDOT Highway Occupancy Permit (HOP). This investigation included preliminary assessments of apparent issues associated with right-of-way, existing structures, utility conflicts, and the constructability of the roadway improvements suggested in the study. McCormick Taylor understands that PennDOT District 8-0 and the applicant are in direct contact regarding the traffic study and HOP requirements. Therefore, the following comments are provided in deference to any other comments that PennDOT has given the applicant during the HOP review process.

- The HOP plans will need to address the design of the proposed interchange improvements.
- The HOP plans will need to incorporate the improvements proposed by other developments.
- Insufficient information was available to adequately assess the potential impacts of proposed improvements to existing utilities.

Conclusions

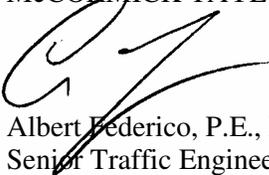
Overall, while several items remain outstanding, the majority of issues have been addressed by the information submitted by the applicant. Further consideration of the project impacts would benefit from the applicant:

- Evaluating the merge and diverge operations of the interchange under existing and proposed conditions.
- Coordinating with PennDOT to verify the need and/or ability to make future improvements to the proposed Single Point Urban Interchange.
- Reconfiguring the site accesses (including possible elimination of the westernmost right-in/right-out) to minimize weaving and other conflicts with the adjacent interchange.
- Updating the traffic operations along US Route 30, including updating the signal coordination and addressing pedestrian accommodations.
- Verification that the improvements by others are proceeding as planned.
- Coordinating with PennDOT and the Township regarding impacts of interchange construction and access to the proposed gaming facility.

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