



February 17, 2021

Laura Wheelock, P.E.
Department of Public Works
645 Pine Street
Burlington, VT 05401

**Re: City Place Traffic Impact Study Review
Burlington, VT
CHA File: 57094**

Dear Ms. Wheelock:

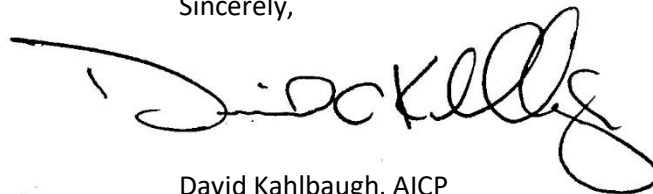
We have completed our review of the City Place TIS (March 2020) and the Trip Generation Update Memo (Oct 1, 2020) prepared by VHB. The following are our comments.

1. We agree with the trip generation assessment presented for the proposed development plan as described in the March 2020 TIS and for the revised development plan described in the October 2020 memo. This analysis shows that the current revised development plan will generate about 30% fewer new trips during the AM peak hour and 25% fewer new trips during the PM peak hour than what was proposed in the March 2020 study.
2. The March 2020 and October 2020 development concepts generate fewer site trips than the original development concept that was analyzed in the January 23, 2017 TIS.
3. The March 2020 study provided mode share and “internal capture” assessments of the site trips to estimate the amount of new vehicle traffic generated by the project during the peak hours. These calculations were not provided for the current revised development plan documented in the October 2020 Trip Gen Update. The change in the mix and density of land uses of the site may affect the amount of internal capture trips, and consequently affect how much vehicle traffic is generated onto the surrounding street network. The calculations of mode share and “internal capture” should be provided for the current development plan to document the estimated net new vehicle trips generated by the project. A table should be provided comparing the current net vehicle trip generation of the current proposal to the net vehicle trip generation of the former development proposals from March 2020 and January 2017.
4. The March 2020 study used the same source traffic data as the previous January 2017 study. Most of this data was originally collected in 2016-2017, but some of the data is from 2013-2015. It is noted that the traffic volumes for the intersection of Main Street and Prospect Street were updated for the March 2020 study using 2017 counts. Although some of this data is more than five years old, it is acceptable to continue to use this data as the basis of the analysis since most of the data is less than five years old, the study is an update of a formerly approved study and the traffic flows have been adjusted and balanced through the study network to adjust for the different years of the counts.

5. The March 2020 study adjusted the base volumes to reflect 2021 and 2026 conditions. However, the 2021 No-Build volumes at some of the study intersections are lower than the 2019 No-Build condition volumes from the 2017 study even though the 2021 No-Build volumes include the previously permitted phase 1 City Place project traffic. At other locations, the 2021 No-Build volumes are significantly higher; for example, the 2021 No-Build volumes at the Pearl/Colchester/Prospect intersection are 28% higher than the 2019 No-Build volumes and are also higher than the previously projected volumes at this intersection for the 2024 Build condition with the former development concept. Additional supporting documentation should be provided to validate and confirm these calculations of the No-Build and Build volumes. This documentation should include volume diagrams showing the 2021 and 2026 No-Build conditions without the other permitted developments to provide a basis of correlating the volumes from the March 2020 and January 2017 studies.
6. The site traffic distribution calculations and volume assignments to the street network should be provided for the March 2020 development concept (since this is the basis of the detailed level-of-service analysis).
7. The March 2020 analysis shows that two intersections will have operations at LOS E or LOS F during one or both peak hours in the Build condition.
 - a. Pearl Street/Prospect/Colchester (LOS F: AM & PM)
 - b. Main/Prospect (LOS E PM)This is a significant change in the LOS compared to the study of the former development concept. These intersections were shown in the 2017 study to operate at LOS D or better in the 2024 Build condition. Additional information should be provided explaining the factors contributing to the reduced LOS at these locations and to identify improvement strategies to mitigate for these conditions.
8. The capacity analysis of the intersections along S Winooski Avenue presented in the study are based on the former road configuration (four-lane undivided) of S Winooski Avenue. This analysis does not reflect the current Complete Streets Road Diet improvements that were implemented by the City in October 2020. Additional documentation should be provided to confirm that the traffic volumes developed for the Road Diet project reflect the permitted volumes for the City Place project and to provide updated analysis of the study intersections along S Winooski Avenue for the 2021 and 2026 conditions.

Please feel free to call me (518-453-3983) if you have any questions.

Sincerely,



David Kahlbaugh, AICP
Senior Transportation Planner

DCK/

c: Norm Baldwin; Burlington DPW
Dale Gozalkowski; CHA