



March 26, 2025

Colleen Monahan
HR Green
1975 Research Parkway, Suite 160
Colorado Springs, CO 80920

**RE: Review Comment Responses / Banning Lewis Ranch Village C
Colorado Springs, Colorado**

Dear Colleen,

SM ROCHA LLC is pleased to provide comment response information for the proposed development entitled Banning Lewis Ranch Village C. This development is located to the east of Banning Lewis Parkway, south of Woodmen Road, and north of U.S. Highway 24 in Colorado Springs, Colorado.

The purpose of this letter is to respond to CDOT Staff review comments (1st Review). We have provided detailed responses to the review comments and made revisions to the Traffic Impact Study as applicable. We remain available to discuss further if needed. The following is a summary of comment responses:

CDOT Staff Comment 1: US-24 South of Garrett assumed to have 6 lanes. Do not make this assumption in the analysis. Attached is the latest study at US-24.

Comment Response: Analysis updated to analyze U.S. Highway 24 as a four-lane cross-section in the long-term year.

CDOT Staff Comment 2:

1. No internal capture should be applied to the ITE 210 (Single-family detached housing)
2. SHAC: Max internal trips: 2% in the AM peak, 8% in the PM peak.

Comment Response:

1. Please refer to ITE's definition of internal capture rates which is described as, "the percentage of total trips that are made entirely within a site (in other words, the trip origin, destination and travel path are all entirely within the site); usually used in conjunction with mixed-use development. Internal capture rates are not applicable to trips within the same land use (for example, a trip made within an office building)."

The National Cooperative Highway Research Program (NCHRP) published a report (Report 684) which presents a technical advancement beyond ITE's methodology which verifies the inclusion of both residential and retail land uses, among a few others, that are to be included within internal capture rates for mixed-use developments. Based on various sites surveyed, NCHRP's Report 684 validates the application of internal capture to complementary uses (specifically retail-residential).

As a check, we completed a draft version of NCHRP's Internal Capture Worksheet (from Report 684) and considered only Residential and Retail land uses. In doing so, NCHRP provided internal capture rates for both Residential and Retail land uses, verifying that internal capture rates do not exclude residential uses.

Based on the above, internal capture rates are to be applied to the overall Banning Lewis Ranch Village C development.

2. Considering the conceptual nature of the land uses and densities, a max internal capture of 2% and 8% has been applied for the AM and PM peak, respectively.

CDOT Staff Comment 3: Study area: the network will need to be extended to include at least (all study intersections needs to be connected):

- a. US-24 & E Woodmen Rd
- b. US-24 & Meridian Rd
- c. US-24 & Falcon Hwy
- d. US-24 & Constitution Ave
- e. US-24 & Marksheffel Rd
- f. US-21 & Stetson Hills Blvd/Garrett Rd
- g. US-21 & Dublin Blvd
- h. US-21 & E Woodmen Rd
- i. If the development adds 5% or more traffic compared to the available capacity- include those intersections too

Comment Response: Intersections A-E have been added to this analysis as requested. It is acknowledged that CDOT Region 2 utilizes the SHAC guideline of 5% contribution when determining what intersections to include in traffic analysis. However, in coordination with CDOT Staff via email dated 2/12/2025, Staff was in support of excluding intersections, F, G, and H from this analysis given that the development would not be requested to assess or provide any improvements to these intersections.

CDOT Staff Comment 4: Eliminate #11 access to US-24 and instead connect Dublin Blvd. to Falcon Hwy

Comment Response: Access Removed.

CDOT Staff Comment 4: Show all the MOEs with all the proposed improvements.

Comment Response: Potential mitigation to intersections with extended delay have been analyzed and included in this analysis.