



April 20, 2026

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 responses to review comments for the proposed Banning Lewis Ranch Village C development. The project is located 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 (2nd Review) dated November 24, 2025. Detailed responses to each comment are provided herein, along with clarification of prior responses, supporting our conclusion that the previously issued traffic study (March 2025) and its findings remain valid and do not warrant revision.

Accordingly, the March 2025 traffic study is resubmitted for your review in conjunction with these responses. We remain available to discuss any questions or provide additional information, if needed.

A summary of responses to the review comments is provided below.

Traffic

CDOT rejects the Traffic Impact Study for Banning Lewis Ranch Village C dated October 2024, revised March 2025 as it still shows a full movement intersection between Garrett Road and Falcon Highway. This does not match the Access Control Plan for US24G, nor does it acknowledge the comments from the letter dated November 1, 2024. Those comments are as follows:

[Response: Stated intersection does comply with the Access Control Plan (ACP) and is allowed to remain as signalized, full-movement pursuant to condition IV. (Access Location), D (26) of Exhibit A of the ACP.]

- The TIS states that US-24 is assumed to be expanded to four through lanes north of Garrett Road and six through lanes south of Garrett Road by year 2044.
 - Do not assume that US-24 will have 6 lanes south of Garrett. Attached is the recent study of the US-24 in the area.

[Repeat response: Analysis updated to analyze U.S. Highway 24 as a four-lane cross-section in the long-term year.]

- The TIS states internal capture up to 2% in the AM peak and 8% in the PM peak.
 - Residential land use should not get the internal trip reduction.

[Repeat response: 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.

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.]

- Extend the study area as shown in the attached document "CDOT Traffic Review".

[Repeat 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.]
- Eliminate #11 access to US-24 and instead connect Dublin Boulevard to Falcon Hwy (to become a 4-legged signalized intersection).

[Repeat response: Access removed.]
- Show all the Measures of Effectiveness (MOEs) with all the proposed improvements.

[Repeat response: Potential mitigation to intersections with extended delay have been analyzed and included in this analysis.]

Refer to the attached documents, "US 24 Garrett Woodmen Traffic Report" and "CDOT Traffic Review", for further review details.

[Response: *Referenced documents were reviewed and incorporated in this analysis where applicable.]*

Address the above comments and resubmit documents as necessary. Provide all Synchro files with the next submittal.

[Response: *All comments believed to be addressed appropriately. Requested Synchro files will be provided directly to CDOT.]*

Access

- The State Highway Access Code requires an access permit if the proposed vehicle volumes increase by 20 percent or more, the development is adjacent to the state highway, and/or significant changes in the use of the property are made which will affect access operation, traffic volume and/or vehicle type.
- Two CDOT Access Permits will be required for this development prior to the subdivision being finalized. The two locations are as follows:
 - Dublin Boulevard to US-24 connection
 - Stetson Hills Boulevard to US-24 connection
- The Development shall coordinate with the City of Colorado Springs to determine Permittee/Applicant requirements for the CDOT Access Permit Applications.

[Response: *Access permitting requirements are acknowledged and will be satisfied during the appropriate stages of the development review process.]*