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Straightforward & Unwavering

December 8, 2016

Ms. Akshali Gandhi
City of Pittsburgh Department of Planning
Transportation Planning-Development Review
200 Ross Street
4th Floor
Pittsburgh, PA 15219

Reference: Response to City Planning and DPW Comments on the TIS for the Proposed East liberty Mixed-Use Development in City of Pittsburgh, Allegheny County, PA.

Dear Ms. Gandhi:

David E. Wooster and Associates, Inc. (Wooster) is in receipt of review comments prepared by Pittsburgh Department City Planning (DCP) and Department of Public Works (DPW) regarding the Transportation Impact Study (TIS) for the proposed East Liberty Mixed-Use Development in the City of Pittsburgh, Allegheny County, PA. The comments were received via email on December 2, 2016. The purpose of this correspondence is to respond to these comments, each of which is reiterated below, followed by a brief response:

DCP Comments:

1. **Resubmit TIS based on the newest iteration of the site plan and street grid. It is our understanding that the site plan and PLDP has changed since submission of the TIS in September.**

   Response: Although some aspects of the PLDP may have changed since the submission of the TIS in September, none of these changes have any impact on the traffic study. Regardless, the latest version of the site plan will be included in the revised TIS.

2. **Peak Hour Volume diagrams should include not only traffic, but peds, bikes, and large vehicles (trucks and buses), as outlined in the Scoping Form B.**

   Response: The report figures are a simplified graphical depiction of the traffic data utilized in the study. As is customary, pedestrian, bicycle and traffic classification information is not included on the report figures, but can be found in the turning movement count data, which is included in Appendix C of the TIS.

3. **While the TIS makes adequate mention of the Negley Avenue bike lane project, there is some discrepancy between what the TIS states and the applicant regarding left turns onto Negley. When Kristin Saunders, the City's Bike-Ped Coordinator, spoke to LG Realty, they said that their project includes a left turn lane from S. Negley onto Eva Street. However, the TIS recommendations do not mention any left turn lane (page 39). Please clarify.**

   Response: A left turn lane from S Negley Avenue into New Eva Street is not proposed as part of the development. The information provided to Ms. Saunders may have been misstated by representatives of LG Realty.

4. **A signal is warranted at the intersection of S. Negley and Eva Street. Engineering justification should be provided not installing a signal.**

   Response: A signal at New Eva Street would be located less than 400 feet away from the existing signal at the intersection of S Negley Avenue and Penn Avenue. Signals located this close to one another are generally not recommended. Queuing would occur through the new traffic signal based on the demand on the northbound Negley approach at Penn. This is not desirable. Further, as referenced in Section 6.2 of the TIS, the local community does not support the installation of a signal at this location.

5. **Reexamine the layout of the Amber/Ravoux turnaround and the possibility of extending the turnaround to South Negley. A connection to Negley is preferable in order to establish a more connected street grid.**

   Response: As suggested, existing Eva Street will be retained. The findings, conclusions and recommendations within the TIS remain unchanged relative to traffic impact as a result of this change.

6. **Provide warrants for all intersections listed in the Form B scoping form.**

   Response: Signal warrants were not performed for existing signalized study intersections or unsignalized study intersections (including proposed site drives) where signalization would not be feasible. Warrants were performed at the intersection of S Negley Avenue with New Eva Street only because there were impacts at this location as a result of the proposed development. No other unsignalized study intersection had impacts requiring mitigation.

7. **For the signal work that will need to be done due to the elimination of the westbound slip lane at the southern end of Penn and S. Euclid Avenues, examine the potential for eliminating the northern slip lane and reworking the northern geometry of the intersection.**

   Response: Parsons-Brinkerhoff (PB) is currently studying the conversion of Euclid Avenue from one- to two-way. Wooster has already begun coordinating with PB and has shared information obtained or developed during the preparation of this study. So as not to duplicate efforts, the evaluation of this potential improvement will be left to PB.

8. **The parking demand analysis needs to be more robust. It should include justifications and calculations for not only the zoning requirements for parking, but also the custom need of the applicant. The submission by Wooster cites what the Zoning Code minimum parking requirement would be if this wasn't in a PUD (481 spaces) and without the available reductions for East Liberty and for bike parking (which would automatically reduce the zoning requirement to approximately 238 spaces by right without going through any sort of variance or special exception processes), and cites the 2010 ITE manual at 85th percentile for 582 spaces. The Zoning Code in Section 914.04 states that Parking Demand Analysis is required for SP Districts and PUD's. This was explained and requested at the Form B scoping meeting, and will be required prior to Planning Commission briefing. Please review Section 914.02.B for more guidance on what is needed for a Parking Demand Analysis. The ultimate request is for the applicant to provide a basis for needing 591 spaces that takes into consideration the proposed uses, the availability and proximity to public transportation and future bike facilities, and the actual parking utilization/demand for similar scaled retail and residential uses within close proximity to the development.**

Response: It is understood that a reduction to the number of parking spaces as a means of encouraging other forms of transportation could be beneficial to the street capacity, however the proposed parking supply recommended (591 spaces) is an accurate balance between the parking source data (ITE) and the minimum requirements as per the City Ordinance. Additional parking data was researched, including, but not limited to, the Urban Land Institute and the American Parking Association. However, these data sources reference back to the ITE data. If data was collected at similar sites in the area, and at the existing Whole Foods location, the information would be less than accurate because a deficiency currently exists. The true demand could not be quantified if patrons are parking outside the existing parking field. The concern for the development is not having enough parking built in, as was the case for the existing Whole Foods. If parking once again becomes an issue, the parking on the adjacent street system would be impacted. As indicated in the approved Form B, Wooster was to compare the proposed parking supply to the City Ordinances and to ITE data. Typically, the performance of a parking demand analysis is used for an applicant to justify why to provide for less parking than strictly required by Ordinance. In this case, the proposed parking supply is within the typical range required by Ordinance. Neither the applicant nor the primary tenant seeks a variance in the parking standard. The parking provided also addresses the community concerns relative to their existing on street parking supplies. The developers proposed parking supply is supported by industry standards.

11/18 - APPLICANT

The Applicant has proposed to provide for 591 parking spaces based upon several factors. The proposed total number of stalls takes into consideration the applicable industry standard for a comparable grocery store of this size and capacity. It further anticipates the proposed number of residential units that will be constructed and additional retail/commercial square footage. In addition, the proposed number of stalls was dictated by City requirements and the Applicant has not sought a reduction.

Status: Insufficiently addressed. Must provide Parking Demand Analysis in accordance with 914.04. See comments above

Response: A Parking Demand Analysis has been provided. See response to Comment #8.

Update the site plan to include the locations of pavement markings (turn lanes, crosswalks, etc.) and ADA curb ramps.
Response: These plans will be provided as part of the FLDP submissions.

DPW Comments:

1. **Include the Scoping Form B in the TIS.**

   Response: As requested, the approved Scoping Form B will be included in the revised TIS.

2. **1.2.2 & 2.1.3, Add amount of parking to be built with each phase.**

   Response: The parking supply in Phase 1 is 591 spaces. The parking supply in Phase 2 will be determined based on the Parking Demand Analysis consistent with City of Pittsburgh Ordinances.

3. **1.2.5 RECOMMENDATIONS and 6.2 ADDITIONAL IMPROVEMENTS TO ACCOMMODATE SITE TRAFFIC, Penn Avenue and Euclid Avenue, the report specifies that the westbound approach of the intersection of Penn Avenue with Euclid Avenue will be modified. Verify that this is actually the eastbound approach which is being proposed to be modified.**

   Response: Wooster acknowledges this error. It is actually the eastbound approach which is proposed to be modified. This error will be corrected in the revised TIS.

4. **SUMMARY OF DEVELOPMENT, describe relocation of Eva Street and extension of North Saint Claire Street as they pertain to the proposed Development.**

   Response: The details of these changes are still being finalized. However, a general description of these proposed changes will be incorporated into the revised TIS, as requested.

5. **3.1 Study Area, 3.1.2 Area of Significant Impact, recommend labeling extension of Saint Claire Street across Penn Avenue "North Saint Claire Street" to avoid confusion, particularly for emergency response purposes**

Response: As requested, this change will be incorporated into the revised TIS.

6. **3.1.1, that area of influence includes both the north and south sides of Penn Avenue.**

   Response: As requested, this change will be incorporated into the revised TIS.

7. **Figure 4 should show the routes as well as the stop locations.**

   Response: As requested, this change will be incorporated into the revised TIS.

8. **3.4 PARKING ANALYSIS, per approved Form B, provide parking conditions supply and demand analysis for Phase 1 and Phase 2 of the proposed development. Describe vehicular parking space reduction, if any, based on proximity to a transit facility. Describe future vehicular parking management plan. Provide the number of spaces required per use per phase and indicate adequacy of that quantity.**

   Response: 591 spaces are being provided in Phase 1, as has been documented in previous Comment #8. Parking supply for Phase 2 has yet to be determined; however it will be determined in a Parking Demand Analysis in accordance with the City's Ordinances.

9. **4.1 SITE TRAFFIC, 4.1.1 Trip Generations, Table 2, the LUC 710 Office AM Trip Totals are incorrect.**

   Response: Wooster acknowledges this error, which will be corrected in the revised TIS, as requested.

10. **4.1 SITE TRAFFIC 4.1.2 Trip Approach and Departure Distributions, For the trip distribution at the intersection of Penn Avenue with Euclid Avenue, provide reasoning why trips were not considered to come from the southbound approach (Euclid Avenue), especially passer-by trips. It's understood that the gravity model considered Euclid Avenue to provide a small fraction of the trips, but the existing traffic volumes on the southbound approach are higher than the westbound approach (Penn Avenue) of the intersection. The trips anticipated to**

originate from and be destined to the east should be distributed between Penn Avenue and N Euclid Avenue.

Response: By examining the layout of the N Euclid Avenue / Station Street intersection (two blocks north of Penn Avenue), it is evident that a substantial portion of southbound traffic on N Euclid Avenue at the Penn Avenue intersection likely originates from the east rather than the north. As such, it can be reasonably assumed that this traffic would utilize Penn Avenue to reach the site rather than diverting to N Euclid Avenue via Station Street and then back down to the site. Regardless, Wooster feels that the methodology utilized in the study represents the most conservative trip distribution projection. Wooster does not intend to alter the current distribution (which represents the worst-case scenario) in the revised TIS.

11. **4.2.1, non-existent existing trips should not be added as background traffic. They are not background traffic. Background traffic is existing traffic that is projected to future year traffic.**

    Response: The purpose of this or any Traffic Impact Study (TIS) is to evaluate the relative change to traffic operations resulting from the development (or redevelopment) of a site. This site recently contained approximately 20,000 square feet of retail space and over 300 apartment units, some of which are still (or were very recently) occupied. Therefore, an evaluation of the net change in traffic within the study area simply cannot ignore the presence of the site's former land use(s). This procedure is normal and customary within the traffic engineering industry. Moreover, Wooster's intention to include traffic generated by the site's former land uses is referenced in the approved Scoping Form B (Section 8.3).

12. **5.0 TRAFFIC ANALYSIS, per approved TIS, provide crash analysis of all study intersections. Provide collision diagram from any study intersection that has more than 25 crashes over the most recent 5 year study period (average of 5 crashes per year)**

    Response: As requested, this information will be incorporated into the revised TIS.

13. **5.0 TRAFFIC ANALYSIS, per approved TIS, provide site distance analysis at uncontrolled study intersections as well as all proposed exits from the proposed development to City right-of-way.**

Response: As requested, this information will be incorporated into the revised TIS.

14. **5.1 SITE ACCESS, Amber Street and Ravoux way shall maintain two-way connectivity to the street grid to maintain existing circulation and access for loading, city vehicles, and emergency vehicles. The study doesn't discuss how they will be configured in the future. There should be a connection there, but the width can be discussed. A two way street doesn't need to be 24' wide. Revise site plan so streets within City right-of-way do not become streets without outlets.**

    Response: The Eva Street access is to be retained as suggested.

15. **5.1, site driveways should be named/labeled on the site plan consistently as named in the text.**

    Response: Wooster will ensure that the proposed site driveways are consistently labeled throughout the report text, tables, and figures in the revised TIS. Please refer to DPW Comment #16 (below) regarding what *may* have been perceived as an error.

16. **5.1, the site plan appears to show two driveways on South Euclid but not described in the text.**

    Response: As requested, Section 5.1 will be updated to reflect both proposed site driveways along S Euclid Avenue in the revised TIS. To clarify, however, Wooster chose to analyze the proposed S Euclid site drives as a single site drive in order to reflect the most conservative results in the TIS. The proposed development will, in fact, include two (2) site driveways along S Euclid Avenue – one (1) for the residential component and one (1) for the retail/office component.

17. **5.1, text should note that Eva Street will have left turns out of it restricted through the pm peak, 4pm -6pm.**

    Response: As requested, this language will be incorporated into the revised TIS.

18. **5.1, as was discussed in the scoping meeting, South St. Claire Street should have a consistent curb line with North St. Claire Street. Creating an offset intersection creates safety hazards and enables left turning traffic to block each**

other entering the side streets. If a consistent curb line is not possible, at a minimum the applicant needs to acknowledge what they are doing with the curb line and justify the geometry.

Response: The applicant intends to justify the geometry as currently proposed. Wooster notes that eastbound left turn volumes into N St. Clair Street are negligible (as identified during the turning movement counts) and that, subsequently, the potential for conflicts is minimal. Regardless, turning movement templates will be prepared and submitted to the City. Because the exact configuration of this intersection will ultimately have no impact on the analyses performed within the TIS, there will be no need to incorporate or reference the final design of this intersection into the study, regardless of what design is ultimately pursued.

19. **5.2, indicate whether the bike lane project is depicted in the Table 5 analysis.**

Response: The bike lane project is, in fact, depicted in the Table 5 analysis.

20. **5.5, indicate calculated required lengths of left turn lanes and provide existing measurements. All Penn/ Negley approaches and all Penn/ St. Claire approaches should be included in the analysis.**

Response: As requested, this change will be incorporated into the revised TIS.

21. **5.6, queue summary, indicate available storage length and note if acceptable.**

Response: As requested, this change will be incorporated into the revised TIS.

22. **5.7 SITE CIRCULATION AND PARKING, provide description of bicycle circulation and parking. Per approved From B, identify existing bicycle rack and bike share locations and bikeways/paths on map.**

Response: We will provide information on the location of existing bike facilities and the developer looks forward to working with City Planning and the Bike Coordinator on the final location of all proposed bicycle facilities.

23. **5.7 SITE CIRCULATION AND PARKING, 5.7.1 Pedestrian, per approved Form B, describe analysis of crosswalk needs and warrants.**

Response: With the exception of proposed crosswalk improvements at the intersection of Penn Avenue with N/S St. Clair Street, no new crosswalks are proposed. The intersection of Penn Avenue and N/S St. Clair will be modified to accommodate the installation of marked crosswalks. ADA accessible accommodations will be provided on the development side. Because this intersection is anticipated to continue to operate under stop sign control, the developer is proposing the installation of pedestrian activated pedestrian crossing warning devices similar to what exists on Forbes Avenue within the environs of Duquesne University.

24. 5.7 SITE CIRCULATION AND PARKING, 5.7.2 Automobiles, is parking garage going to be built as part of Phase I or Phase II of project? Clearly show both structured and surface parking with loading zones and vehicular circulation on Site Plan in Figure 2.

Response: The 591 space parking facility will be developed in Phase 1. The loading zones and circulation plan will be provided in the final TIS.

25. 5.7.3 LOADING VEHICLES, Describe size of truck or service delivery vehicle considered. Describe number of loading zones required by code for Phase I and Phase II, each. Clearly show loading zones and refuse storage on site plan. Provide truck turning templates to illustrate proposed loading movements are feasible. All loading areas must be on-site. Loading zones in the right of way will not be permitted in new construction.

Response: All loading areas are being proposed on-site. The loading plans will be provided in the FLDP.

26. 6.2 ADDITIONAL IMPROVEMENTS TO ACCOMMODATE SITE TRAFFIC AND COSTS, describe how restricted left egress turns from Eva Street will be regulated from 4-6pm daily, without restricting at other times of the day. The report states a signal is warranted, but a warrant analysis is not provided.

Response: See response to DCP Comment #4. As referenced in Section 6.2 of the TIS, the local community does not support the installation of a signal at this location. The PM peak hour turn restrictions will be regulated via on-site signage. Additionally, due to high volumes on S Negley Avenue during this timeframe (which

are the very reason for this turn restriction in the first place), Wooster anticipates that this restriction will be self-regulating, as sufficient gaps will not be available to motorists wishing to make left turns out of the site. As such, it is anticipated that they will opt to turn right and alter their route, accordingly. Residents and/or frequent users of the retail component of the development are anticipated to adjust their exit route, accordingly, in turn utilizing another exit (such as S St. Clair Street) during future visits.

27. **Figure 2, provide separate site plans for Phase I and Phase II of development. An updated site plan must be provided.**

Response: Updated Master Plans will be provided in the final TIS. Site plans will be provided in the FLDP

28. **Figure 2, clearly indicate on Site Plan the location of Site Drive A and Site Drive B, as shown in Trip Generation Figures.**

Response: The final plans will properly label and depict the Site Drives.

29. **Figures, Site Drive A is not utilized in Phase I, but is shown on the figures. Is this driveway to be constructed as part of Phase II of the development? If so, remove from Phase I figures.**

Response: Wooster established the site drive names based on their location, which occurred prior to assembling the TIS and contemplating the proposed phasing. Upon realizing that Site Drive B would be constructed prior to Site Drive A, Wooster wished to avoid any confusion associated with introducing Site Drive B into the report figures before Site Drive A. Wooster also wished to avoid reversing all references to Site Drives A and B throughout the report text, figures, tables, and analyses. As such, Site Drive A was shown on the Phase I figures, but was "lightened" to reflect that it would not be constructed until Phase II. During reproduction of the study, Site Drive A was inadvertently darkened. Wooster will lighten Site Drive A even further in the revised TIS.

30. **Figure 1, Align proposed Saint Claire driveway on the site with N Saint Claire Street across Penn Avenue so that the proposed intersection is not an off-set intersection. The proposed off-set intersection will cause conflicting left-turns.**

Response: Wooster disagrees with this comment. See response to DPW Comment #18.

31. **Analysis, Synchro models, include Friendship Avenue in the intersection of Baum Boulevard with Euclid Avenue.**

Response: The subject intersection has an unorthodox configuration that could not be accurately modeled in Synchro without compromising the capacity and queuing results for the main approaches. Because Friendship Avenue does not include an approach to the intersection (it is one-way headed away from Baum Boulevard), and because the only movement permitted into the omitted leg (Friendship Avenue) is southbound right turns from S Euclid Avenue, which are free-flowing with no conflicting movements or impedances, the absence of this leg in the model has no impact on the findings, conclusions and recommendations of the study.

32. **Analysis, In the Synchro models, the Adjacent Parking Lane is checked only for the right turn movement at the intersection of South Negley Avenue with Friendship Avenue. When an adjacent parking lane is present, the movements which are affected by the parking should be checked in the Volume Settings box in Synchro. Since both the northbound and southbound approaches each only have one lane, a parking maneuver affects the left turn movement, through movement, and the right turn movement; therefore, the Adjacent Parking Lane boxes for all three movements should be checked for the northbound and southbound approaches.**

Response: Wooster acknowledges that the "Adjacent Parking Lane" box should have been checked for these movements. However, because no parking maneuvers were observed on these approaches (and were coded as such into the Synchro model), Wooster has confirmed that checking these boxes has no impact on the results of the analyses, and Wooster does not intend to incorporate this change into the revised TIS. An example of a comparable situation would be coding the model to reflect that right turns on red are permitted at a signalized intersection, but observing no vehicles

making right turns on red during data collection. If no right-turning vehicles are coded into the model, it makes no difference if the "right turn on red" box is checked or not.

33. Analysis, Provide traffic signal permit plans and timings, if available, that were used to model the Existing Year 2016 Conditions

Response: As requested, this information will be incorporated into the revised TIS.

34. Bicycles are included in the Synchro model but were not documented or included in the TIS.

Response: This information can be found in the turning movement count data, which is included in Appendix C of the TIS.

We trust that this response has been submitted in proper form. If you have any questions or require additional information, please feel free to contact me.
Sincerely,

Joshua A. Haydo, P.E.
Traffic Engineer

JAH/jah

Cc: Mr. Corey Layman – City of Pittsburgh, Zoning *(letter only; via email)*
Ms. Katy Sawyer – City of Pittsburgh *(letter only; via email)*
Mr. Jonathan Kamin – Goldberg, Kamin & Garvin *(letter only; via email)*
Mr. Lawrence Gumberg – LG Realty Advisors, Inc. *(letter only; via email)*
Mr. Zachary Gumberg – LG Realty Advisors, Inc. *(letter only; via email)*
Mr. Lawrence Gumberg – MV+A Architects *(letter only; via email)*

W:3184120816Response to Comments