



4/17/2026

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RE: The Link – Engineering Response to Public Traffic Concerns

Mayor Reed and Members of Council,

Prior to the Planning Commission’s public hearing on the referenced project’s rezoning request, a “supplemental information packet” entitled *The Cost of Compromise* was prepared and submitted by an opposition group for consideration by both Planning Commission and Council. This packet included and heavily referenced a memo entitled *Shortcomings of the Traffic Impact Analysis Conducted for the Link*, which was prepared by a resident of Ott Street, David Bernstein. It should be noted that Mr. Bernstein is not a traffic engineer by trade. I am providing this letter as a formal response to the TIA criticism, in hopes of dispelling some of the noted concerns.

Trip Generation

The memo references concerns relating to the TIA’s methodology of trip generation for the project, insinuating that the report underrepresents the project’s actual trip loading on adjacent streets. Please note that all aspects of the TIA, including that of trip generation basis and use-code utilization from the Institute of Transportation Engineers’ (ITE’s) *Trip Generation Manual*, are thoroughly vetted in advance of any TIA preparation in the City through a scoping session with the City’s Public Works Department.

Usage of ITE Use Code 221, Mid-Rise Multifamily Housing, was deemed most appropriate for analysis of the Link due to its likely resident mix and competency of available data. ITE Use Code 221 is not inherently exclusionary for analysis of projects that include student residents, and suggestions that alternative Use Codes or basis metrics (residents vs units, etc.) ignore the statistical invalidities that those options present. The ITE *Trip Generation Manual* is a collection of data points, and is ever evolving as new data points are added with releases of new editions; as such, it includes many data sets that it states are not substantial enough for utilization at time of release, and that sound engineering judgment (such as that utilized by the author and the City’s Public Works Department during the TIA scoping session) must be used when selecting which data set to utilize for trip generation analysis.

Further, the *Shortcomings* memo paints a picture that trip generation could be substantially higher if based on metrics of parking spaces provided or number of bedrooms vs number of units. In doing so, the memo misapplies trip generation rates that were derived from data sets exclusively tied to units alone. That is to say, an ITE scatter plot created using “units” as the x axis and “trips” as the y axis, with counts based solely on number of units without regard to number of residents, bedrooms, or parking spaces provided, can only derive an average rate of application to be used on a “unit” basis; it cannot be applied to metrics that were not segregated as part of the data set collection. Doing so, as the memo did in its Table 3 displays a fundamental misunderstanding of how to apply ITE Trip Generation rates.

I’ll reiterate that the TIA’s trip generation basis was reviewed in advance by the City’s Public Works Department and deemed to be the most prudent option available. No additional reductions were made on the basis of public transit or alternative transit (walking, scooters, ride-share, etc.) in effort to be conservative in the trip generation process, in direct opposition to the claims made by the *Shortcomings* memo.

Trip Distribution

The *Shortcomings* memo claims fault in the TIA in that certain intersection approaches showed no increase in post-development build scenarios. This criticism shows a fundamental misunderstanding of the purpose of a TIA in this context. In the Trip Distribution process, all assumptions are again vetted through the City’s Public Works Department. Trip assignments are made in 5-point integers, such that any movement deemed to yield less than 5% of the project’s total inbound or outbound trip generation receives an assignment of 0%, with the understanding that an assignment of less than 5% on a project of this scale does not have any significant impact on the measures of effectiveness being studied. That is to say, the impact would be insignificant and yield no recommendations for mitigation. Trip assignments below a certain threshold would be less than day-to-day variations and thus inconsequential to the report’s findings.

The *Shortcomings* memo asserts that some traffic will inevitably utilize Paul St as a connection between MLK, Jr Way and S Main St. I’ll note that the TIA’s supplemental cut-through analysis of Paul St does not assert that zero traffic will use this route, just that there is not any evidence to suggest that the project will incentivize any significant usage, on the basis of travel time, nuisance factors present on Paul St, etc. So long as Paul St remains a public street, it will remain an option for public usage; but existing deterrents for usage for this cut-through maneuver remain effective following development of the Link. Despite this, the developer of the Link has proffered a cash contribution that may be utilized to



create further deterrents on the basis of local resident concerns, versus any concern quantified by the TIA or voiced by the City's Public Works Department.

Parking

The *Shortcomings* memo asserts that insufficient parking is provided on the assumption that one car will be owned per bedroom of the development. While parking is not addressed by the TIA, as it falls outside of scope of the TIA's purpose, I'll note that the memo's author cites no basis for the very conservative car-ownership assumption utilized. Further, it is widely understood that an over-abundance of parking incentivizes car ownership and dependency in the worst of ways. This project seeks to reduce car dependency and associated traffic disruption through its centralized location and the deterrent of fee-based parking.

Scope of the Analysis

The *Shortcomings* memo asserts that the TIA scope is insufficient, as it did not study certain intersections further away from the development, and only examined peak hours as opposed other timeframes/durations. This criticism again shows a fundamental misunderstanding of the purpose of a TIA and how it is created. In short, the TIA seeks to define limitations in existing infrastructure, so that proper mitigation may be identified. To do so, it examines traffic measures of effectiveness during peak hours of any given work day. Again, the scope was created in direct coordination with and approval from the City's Public Works Department, and deemed to be sufficient to this task. Analyzing distant intersections with insignificant impact from the development, or off-hours with less impact to the analyzed measures of effectiveness, would produce zero additional recommendations for mitigation, and thus do not serve the purpose of the TIA.

Paul Street

The *Shortcomings* memo identifies several issues relating to existing Paul Street's geometry and grade. While not directly analyzed within the scope of the TIA, I'll note that the deficiencies identified are part of the "nuisance factors" described in the supplementary analysis of cut-through traffic, which results in less attractive justification in driver route choice in this location.

Methodology

The *Shortcomings* memo references known limitations to a standard TIA, such as non-analysis of driveway density, street grades, etc. I'll again note that the scope of the TIA was



created with and approved by the City’s Public Works Department and deemed sufficient for the scale of the project in consideration. Reconstruction of a public street to address a steepness concern, for instance, would be significantly outside of any reasonable expectation for a project of this scale to bear. It should be noted, however, that one of the “limitations” cited by the memo, “queues backing up to and interfering with the operation of an upstream intersection” is most certainly covered in the report’s queueing analysis, with no issues reported.

Paul Street Extension

Finally, the *Shortcomings* memo asserts that there is no basis for the proposed Paul St extension, as the TIA does not depict a significant background trip usage. The purpose of the Paul St extension is multifold, with creation of a north-south connection between S Liberty St and S Main St among them. Such a connection allows the City to potentially re-work or even close the Grattan St crossover “triangle” at some future date, if deemed appropriate at that time, without limiting north-south connectivity over a significant stretch of downtown. The same connectivity will benefit the City following its planned closure of Warren St in association with the Build Our Park project. In addition, the roadway extension will allow for critical services, such as deliveries and ride-share pick-up/drop-off, to be located outside of S Liberty St and S Main St. It also allows for potential relocation of entrances serving the southern church parking lot, which would further reduce the number of conflicts existent upon S Liberty St and S Main St. The criticizing memo fails to acknowledge these benefits in its overview.

In sum, the *Shortcomings* memo seeks to create concern over the validity of the City-approved Traffic Impact Analysis through many assertions that are not grounded in sound, traffic engineering principles, and that do not hold up under scrutiny. As a licensed Professional Engineer and member of the Institute of Transportation Engineers that has been practicing traffic engineering for ~25 years, I welcome any questions from Council on any of the assertions made or lingering concerns that remain. I will be available during next week’s public hearing for such questions, and look forward to seeing you then.

Sincerely,



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