

APPENDIX 1:

Fairfax County Department of Transportation

&

Virginia Department of Transportation (VDOT)

Comments on

Chapter 527 Transportation Impact Analysis for

BRAC APR 08-IV-4S,

08-IV-5S & 08-IV-8S



County of Fairfax, Virginia

MEMORANDUM

DATE: May 11, 2009

TO: Lindsay Mason
Policy and Plan Development Branch, FCDPZ

FROM: Nick Perfli
Transportation Planning Section, TPD, DOT

SUBJECT: BRAC APR #08-IV-4,5,8S; I-95 West Cluster

The Department of Transportation offers the following comments regarding the proposed changes to the Comprehensive Plan indicated in the subject Area Plan Review (APR) nominations:

- For the I-95 West Cluster, the proposed Plan amendments will add traffic volume proportionally equivalent to the capacity of approximately three additional lanes of minor arterial roadway. This broad example represents a measure of the relatively substantial cumulative impact of the cluster to the surrounding roadway network.
- The 4S site fronts along Backlick Road. Backlick Road typically consists of four travel lanes between the intersections with Fullerton Road to the south, and Franconia-Springfield Parkway to the north. The Comprehensive Plan does not include improvements for Backlick Road. Portions of Backlick Road, including the section fronting the 4S site, have a third southbound travel lane and a center median with left turn lanes. Some portions of Backlick Road in this area have a sidewalk along the west side of the road, while the east shoulder and clear zone separate Backlick Road from the right-of-way fencing on the western boundary of Interstate 95 and contain no pedestrian facilities.
- The Comprehensive Plan calls for the consolidation of entrances along the 4S portion of Backlick Road. The multiple 4S parcels each have an entrance, with only the southern parcel (4S #1C) having access to a median break allowing left turns to northbound Backlick Road. Staff recommends this entrance should be preserved and the existing right-in right-out entrance on parcel 4S #1B be eliminated or limited to entrance only. Traffic along the 4S segment of Backlick Road can be expected to increase based upon NGA locating to the EPG site and Board of Supervisors approved redevelopment and growth at the Pallone Chevrolet/Patriot Ridge site.

- The 5S and 8S sites front along Fullerton Road. Fullerton Road typically consists of four travel lanes, two in each direction, between the intersections with Backlick Road to the northeast and Rolling Road to the southwest. The Comprehensive Plan shows Fullerton Road as improved to six lanes between the Fairfax County Parkway and Boston Boulevard and improved to four lanes for a portion of the segment from Boston Boulevard to Rolling Road. Portions of Fullerton Road are privately owned and include congested areas with numerous access points and some on-street parking. Some portions of Fullerton Road closer to Rolling Road are two lanes. Most portions of Fullerton Road in this area have a sidewalk along each side, including segments adjacent to the 5S and 8S sites.
- The existing VA-7100/Fullerton Road at-grade intersection will be removed as Fairfax County Parkway extension work progresses;
 - When this intersection is restricted for construction (anticipated in January 2010) the access to I-95 northbound will be eliminated, requiring future access via a circuitous alternate route following Fullerton Road to the southwest to Rolling Road, and using a newly constructed eastbound ramp to the Parkway back to the I-95 interchange. This route will be necessary until construction of the Boudinot Interchange is complete (interchange construction is fully funded with ARRA/Stimulus funds).
 - Southbound I-95 will continue to be accessible via the existing Boudinot/Alban intersection ramp.
- The 4S site is adjacent to a proposed Defense Access Road (DAR) project to provide elevated access to EPG from I-95. Accommodations must be made to allow for the future construction of this elevated ramp over and through the site, if necessary.
- Adjacent to the 4S nomination at the existing Pallone Chevrolet site, the Board of Supervisors approved over 1 million SF of office and hotel development with the Patriot Ridge Plan Amendment in 2008. The 4,5,8S nominations would add additional development.
- Signal retiming and modification was offered as a mitigation measure at select intersections within the study area. It should be noted that VDOT operates traffic signals in networks where signal cycles are determined to allow for network optimization (as opposed to a single intersection). The feasibility of signal modifications would need to be evaluated as part of a network and not a single intersection.
- In several instances, the I-95 West (8S) traffic consultant recommended roadway reclassification as a measure to increase road capacity without any physical improvements to the roads or improvements in transit service. Simply reclassifying a road without accompanying improvements does not improve operation of the

transportation system. In addition, such reclassification would be subject to Federal Highway Administration, VDOT, and County review and approval.

- Tables below outline intersection level of service and net new trips for nominations within the I-95 West Cluster. All 2030 values assume build-out of the CLRP transportation network and the development of the Pallone Chevrolet/Patriot Ridge site as adopted by the Board of Supervisors in 2008.

INTERSECTION LEVEL OF SERVICE

Intersection	2007 Existing	2030 Comp. Plan	2030 8S Nomntn	2030 Cluster Cmltv
FULLERTON RD/ BACKLICK RD	AM - B PM - C	AM - C PM - B	AM - E PM - C	AM - E PM - D
FULLERTON RD/ BACKLICK RD (1)			AM - D PM - B	AM - D PM - D
FULLERTON RD/ VA-7100	AM - B PM - D	INTERSECTION REMOVED	INTERSECTION REMOVED	INTERSECTION REMOVED
FULLERTON RD/ BOUDINOT DR	AM - B PM - B	AM - D PM - E	AM - D PM - F	AM - E PM - F
FULLERTON RD/ BOUDINOT DR (2)			AM - D PM - E	AM - D PM - D
FULLERTON RD/ BOSTON BVD	AM - C PM - C	AM - C PM - D	AM - C PM - D	AM - C PM - D
ALBAN RD/ BOUDINOT DR	AM - C PM - D	AM - C PM - D	AM - D PM - D	AM - D PM - D
ALBAN RD/ BOUDINOT DR (3)			AM - D PM - C	

- (1) 8S mitigation: signal modification; cluster mitigation: geometric improvement, signal modification
 (2) 8S mitigation: signal modification; cluster mitigation: geometric improvement, signal modification
 (3) 8S mitigation: signal modification/coordination

TRIP GENERATION – 4,5,8S NOMINATIONS (EST. NET NEW TRIPS)

NOMINATION	AM PEAK	PM PEAK	DAILY	PERCENT NEW DAILY TRIPS
08-IV-4S	563	513	3,791	28 PCT
08-IV-5S	488	449	3,794	28 PCT
08-IV-8S	603	566	5,854	44 PCT
TOTAL TRIPS	1,654	1,528	13,439	

- The Comprehensive Plan shows Fullerton Road improved to six lanes west of Backlick Road to Boston Blvd and improved to four lanes west of Boston Blvd. Based on further intensity of use at the sites, FCDOT recommends, at a minimum, the following additional improvements:

- Fullerton Road/Boudinot Drive: restripe the WB approach to convert left turn lane to a through lane.
 - Fullerton Road/Boudinot Drive future interchange: construct a free-flow right turn lane from SB/WB Fullerton Road (traveling toward Rolling Road from Backlick Road) to VA-7100.
 - Add a new ramp from NB/WB VA-7100 to NB Backlick Road to allow vehicles to access WB Fullerton Road and SB Backlick Road and Alban Road. This new ramp, in one configuration option, could form the fourth leg of the existing Fullerton/Backlick “T” intersection.
 - Increase in transit and shuttle services in the area. Transit or shuttle service should be added to connect developments in the I-95 West cluster area to the Franconia-Springfield Metro and VRE station and future transit station on the grounds of EPG. Transit operations funding should be contributed by the nominator consistent with other transit operations contributions within the County.
 - Working with Fairfax Connector staff, 4,5,8S nominators should identify potential bus stop locations along Backlick and Fullerton roads. Shelter construction and recurring maintenance should be required as determined appropriate by Fairfax Connector staff.
 - Added development intensity should be contingent on the reconstruction of or improvements to the I-95/VA-7100 interchange at Newington. VDOT is currently studying potential improvements to the I-95/VA-7100 interchange.
 - Added development intensity should be contingent on the completion of and ramp improvements to the Boudinot Drive/VA-7100 interchange (Fairfax County Parkway Extension Phase IV), and additional capacity along the future VA-7100 to accommodate additional development. The future VA-7100 extension will be opened in 2011 as a four lane facility with accommodations for six lanes.
- On the EPG site, the NGA is providing parking spaces for only 60 percent of the expected workforce. This forces approximately 40 percent of employees to use methods other than SOV to arrive at work – transit, car pools, and other non-SOV methods. A similar requirement of constructing less than 100 percent parking for employees could be used at sites within the I-95 West cluster. This will encourage TDM participation by employees as not all will be able to park. Employers could charge a parking fee not to be less than the general cost of using Metrorail or VRE.
 - Access management/driveway consolidation is necessary along Backlick (4S) and Fullerton (8S) roads.

RECOMMENDATIONS

- Future improvements would need to be added to the Comprehensive Plan Transportation Map to support further development in the vicinity of the I-95 West cluster at the intersections and along the roadway segments noted above.

- Backlick Road would need an additional lane, at a minimum, in the cluster area due to increases in volume.
- Entrances would need to be consolidated along Backlick and Fullerton roads.
- Fullerton Road would need to be widened from existing four lanes to six, and from existing two lanes to four. Portions of existing Fullerton Road are private roadway. Alban Road would need to be widened to a five lane facility in the I-95 West cluster area.
- The 4S nomination must accommodate the future Defense Access Road (DAR) aerial ramp that may pass over or adjacent to the site from the I-95 flyover ramp to EPG. Provisions should be made to accommodate a future connecting facility.
- Provision of additional right-of-way to accommodate proposed turn lane additions (instead of lane reconfiguration) where necessary. Additional right-of-way would be needed to add turn/through lanes instead of existing lane reconfiguration. While reconfiguration is practical, it is not a viable solution for impact mitigation.
- It is recommended that future development (which would be in addition to the approximate 1 million + SF of development approved in 2008 for the Pallone Chevrolet/Patriot Ridge site) in the I-95 West cluster be phased as transportation improvements are indentified and constructed (or operated for transit). This includes improvements to the I-95/VA-7100 interchange at Newington (currently under study by VDOT), completion or ramp improvements to the Boudinot Drive/VA-7100 (Fairfax County Parkway extension project Phase IV [now fully funded with ARRA/Stimulus funds]), and the opening of the Fairfax County Parkway extension.

Please contact Nick Perfili, Transportation Planner, at nicholas.perfili@fairfaxcounty.gov or 703-877-5685 should you need further information or clarification of these comments.

NP:np

cc: file
Leonard Wolfenstein, Transportation
Dan Rathbone, Transportation
Angela Rodeheaver, Transportation

Review of APR Nomination BRAC #08-IV-8S – (part of I-95 West Cluster)

INTRODUCTION

In preparation for review of BRAC-related APR applications, Fairfax County staff completed several efforts that became the starting point for applicants' subsequent Traffic Impact Analyses (TIA). These efforts included:

- **Grouping of applications.** Applications were grouped into “clusters” based on professional judgment of the common transportation network elements impacted by the proposals. All applicants were required to assess the impact of their individual site, as well as the cumulative impact of their cluster, on common road network elements identified by County staff in the vicinity of the cluster.
- **Traffic counts.** Turning volume traffic counts were conducted by Fairfax County during 2008 at approximately 40 intersections throughout the area of the applications, and were used as the basis for the County's future projections. Traffic count information was also made available to applicants to conduct their existing conditions operational and link capacity analyses.
- **Traffic Projections of Year 2030 “Background” Traffic.** The methodology used by Fairfax County to derive the projections is an important element of the overall process since these projections are part of the input applicants used to complete their analyses. Summary of our understanding of the methodology used, and brief comments, are included below. Year 2030 “Background” traffic conditions are those that would occur in the year 2030 with the existing Comprehensive Plan land use, and before consideration of the subject nominations. County guidelines to the BRAC APR applicants required analysis by each application of Existing Conditions, as well as the following three year-2030 scenarios: 2030 “Background” Conditions, 2030 Conditions with APR nominated site, 2030 Conditions with all APR-nominated sites in the cluster.
- **Planning-level Capacity Determinations.** Fairfax County Department of Transportation (FCDOT) recently developed New Capacity Level-Of-Service (LOS) boundaries for 7 facility types, for use in planning analysis of BRAC-related Comprehensive Plan amendments. Applicants used these capacities in their assessment of volume-capacity (v/c) conditions along specific road segments, for each of the four scenarios required by the County guidelines, listed above. Overview of the new planning-level capacities used in this process is included in the next section.

OVERVIEW OF INPUT DATA DEVELOPMENT

1. **Traffic Projections of Year 2030 “Background” Traffic.** Fairfax County staff developed background 2030 traffic forecasts for the BRAC APR analyses, and provided these forecasts

to applicants' representatives to maintain consistency in the forecasting process and analysis. For this land development stage (Comprehensive Plan Amendment), the focus was to produce reasonable link volumes (needed for capacity evaluations), rather than exact 2030 turn volumes. Since County staff also desired limited operational analysis of selected intersections, estimates of turn volumes were also derived for use by applicants in their TIAs.

Each cluster's existing AM and PM traffic counts (turns) were factored to 2030 by individual approach growth factors. The growth factors were applied only to approach volumes, and not the departure end. Estimates of future turn volumes were rounded.

The Fairfax County travel demand model was used to derive growth factors. This model is based on the MWCOG/ TPB travel demand model, with additional detail for both road network and analysis zones (Fairfax County model has approximately 5 times the number of Traffic Analysis Zones, or TAZs, that the TPB model has). Growth factors were developed by comparing link volumes under 2 scenarios: "Existing" conditions (year 2008) and "2030" conditions. County staff used the latest information available at the time the process was initiated, and incorporated detailed data from recent subarea studies. The basic land use version used was modified 7.0, with data adjustments and enhancements derived from studies such as the Springfield Area Study (Huntington cluster area) and BRAC EIS (Fairfax Co. Parkway and Backlick Rd. area).

Based on the information provided to date by County staff, we believe the above steps represent a reasonable methodology to estimate future 2030 traffic turning volumes, based on the information available to staff, adjusted with local detail from recent previous analyses, along with combined very experienced professional judgment.

- 2. Planning Level Capacity Determinations.** As indicated in the 6/30/08 report *TPB Travel Forecasting Model, Version 2.2: Specification, Validation, and User's Guide*, the TPB Travel Forecasting Model uses **area type codes**, ranging from 1 (very dense) to 7 (less dense), based on both population density and employment density within 1 mile of a given traffic analysis zone (TAZ). Thus the area type code represents both the intensity of land use development and mix of home and job locations. This variable is also used as a basis for **highway link capacities for each roadway facility type**. For example, LOS E Capacity of a Major Arterial ranges from a low of 800 passenger vehicles per hour per lane (vphpl) in the densest area type (AT=1), to a high of 1,260 vphpl in the more rural areas (AT=7); the equivalent values for a Collector are 300 to 800 vphpl.

Fairfax County Department of Transportation (FCDOT) recently developed New Capacities – Level of Service (LOS) boundaries for 7 facility types, for use in planning analysis of the BRAC-related Comprehensive Plan amendments. A review of mid LOS E values suggests that the capacities assumed by FCDOT, compared to TPB's for the corresponding area types, may be relatively high for Freeways and Arterials, but similar or even slightly low for Collectors. For purposes of Comprehensive Plan Amendment applications, we believe the capacity and LOS values provided by FCDOT to the BRAC- APR applicants are a reasonable approximation for planning analysis. Volume/capacity ratios are used as one of the factors indicative of impact of traffic generation and potential need for mitigation and/or improvements. Additional care should be exercised when evaluating the performance of

specific arterial road segments when results indicate the road is at/near capacity, as defined by FCDOT: the combination of capacity definition, underestimated trip generation, and/or trip distribution assumptions, may all combine to obscure overall impact on road segments operating near their capacity threshold. For more detailed analysis and improvement decisions, these values should not substitute for capacities established based on more detailed and localized engineering analysis.

OVERVIEW OF KEY FINDINGS --CUMULATIVE IMPACT OF BRAC #08-IV-8S AND I-95 WEST CLUSTER

1. Summary of Application and the Cluster:

Base Realignment and Closure (BRAC) Related Area Plan Reviews (APR) - Chapter 527 Submissions				
Area Plan Review APR # Name (Lot Size)	Location	Land Use Existing Comp. Plan ^a	Land Use Proposed Comp. Plan by Applicant ^a	Trips: AM / PM / ADT Existing Comp. Plan (Proposed Comp. Plan)
I-95 West BRAC Cluster				
Pallone Chevrolet/ Patriot Ridge	North of Fullerton Rd, and West of Backlick Rd	131,000SF of new car sales lot	937,000SF of office space, and 162-room hotel	289 / 354 / 4,367 (1,199 / 1,224 / 8,547)
BRAC 08-IV-4S	North of Fullerton Road, and West of Backlick Road	127,610SF light industrial	510,440SF of office space	129 / 138 / 890 (692 / 651 / 4,681)
BRAC 08-IV-5S	North of Fairfax County Pkwy Ramps, and West of Fullerton Road	73,000SF light industrial	482,630SF of office space, and 155-room hotel	74 / 79 / 509 (488 / 449 / 3,794)
BRAC 08-IV-8S <i>Motor Associates, LLC</i> (6.3 Acres)	South of Fairfax County Pkwy, North of Boudinot Dr and West of Fullerton Rd	96,050SF light industrial	419-room hotel, and 298,000SF of office space	89 / 95 / 616 (603 / 566 / 5,854)
I-95 West BRAC Cluster				Net New Cluster Trips: Proposed Comp. Plan - Existing Comp. Plan = 2,982 / 2,890 / 22,876

This proposed comprehensive plan modification would result in approximately 600 net new trips in the AM peak hour and about 570 net new trips in the PM peak hour, and approximately 6,000

net new daily trips. From a very broad perspective, this volume is approximately equivalent to the capacity of almost 1 additional lane of a minor arterial type B roadway. For purposes of estimating the order of magnitude of impacts this is equivalent to half a lane in each direction. For the I-95 West Cluster, the proposed Comprehensive Plan Amendments will generate approximately 2,982 new trips in the AM peak hour and about 2,890 trips new trips during the weekday PM peak hour (total, both directions), and approximately 22,876 new daily trips. This volume is proportionally equivalent to the capacity of about 3 additional lanes of a minor arterial roadway. This broad comparison represents a measure of the substantial cumulative impact of the cluster to the surrounding local road network.

2. Key Findings

General: There are general comments related to the formatting and content of the study, which reflect a lack of consistency in the report.

- The TIS report does not include any section numbering for easy reference.
- In the “Introduction and Summary” section, paragraph 2, it has been stated that the subject parcel is within the Area IV, I-95 Industrial Area Planning District. This information is inaccurate as there is no I-95 Industrial Area Planning District in the Fairfax County Planning District system. The I-95 Industrial Area is rather a sub-region within the Springfield Planning District.
- The report contains several references to the technical appendices, yet it does not specify which Appendix the related information can be located.

Study Area: According to the TIS report the study limits were selected in conjunction with the Fairfax County Transportation Planning staff. The study area limits defined in the report and the intersections studied are relatively reasonable from an engineering standpoint considering the location of the site and the limited roadways accessing the study area. However, given the proximity of the proposed site to the I-95 corridor, the network of ramps to/from I-95 and Fairfax County Parkway within the study area should have been analyzed. Hence, the level of impact on the adjacent ramps is not known.

Trip Generation: The trip generation results for the subject development including the surrounding APR nominated land uses were generally estimated using the ITE trip rates instead of the ITE regression equations. Justification needs to be provided for the use of the ITE trip rates versus the regression equations. Refer to Chapter 527 guidelines which have a preference for use of regression equations (pre scope of work meeting page 7). The scope of work agreement and the “Introduction and Summary” section of the report indicated the proposed comprehensive plan amendment will include a Specialty Retail, General Office and Hotel land uses, however, in the trip generation analysis the Specialty Retail land use was estimated as part of the general office land use. This assumption is inaccurate and results in fewer site trips.

Trip Distribution: There is a substantial lack of justification for the trip distribution assumptions, such as the referenced “current and forecasted travel patterns”, which hinders the validation of the trip distribution proportions. Additionally, there is no information regarding the traffic assignment percentages used to distribute trips to the individual study intersections.

Intersection Analyses: Lane groups or roadway segments with measures of effectiveness indicating unacceptable LOS, significant delays and queues, or critical areas where capacity constraints are likely to create severe congestion in the future were not included in the result summary tables or supporting graphics and/or result discussions.

Roadway Link Analyses: The link analysis results presented in the report did not include essential elements such as the traffic volumes and roadway capacities upon which the results were based. A number of discrepancies were identified with the lane configurations considered (e.g. the southbound approach of Fullerton Road – north of Fairfax County Parkway was analyzed as two through lanes instead of three lanes). Additionally, the link analysis results are not specific for segments experiencing LOS “A” through LOS “D”, instead the related results are presented as LOS “D” or better. This style of presentation does not depict a clear picture of how the roadway links operate over time. There are a number of inconsistencies between the link analysis results summarized in the discussion and that shown in the result tables for segments experiencing LOS “E” and LOS “F”.

Mitigation Measures: The mitigation measures discussed in the recommendations section do not describe how the proposed improvements will mitigate the impacts of the APR Nomination 08-IV-8S development within the study network. There is no specific discussion regarding the TIS cluster analysis as well as recommendations for mitigating the impacts of the future developments within the cluster.

Multimodal analysis: The report briefly discusses the proximity of the proposed development to some of the bus services and bus routes as well as pedestrian accommodations within the study network. The report does not include any pedestrian or transit analysis with the objective of evaluating the impacts of the proposed APR nominated development on the surrounding non-auto services and infrastructure.

Recommended Improvements: The report concludes that the proposed nomination would require some roadway improvements besides CLRP roadway improvements and other proffers. Some of the recommended solutions proposed by the Consultant to mitigate the impacts of the proposed development include:

- signal timing enhancements throughout the study area. . It should be noted that VDOT generally operates signals within networks where cycle lengths and progressions are determined by optimizing the performance of the network (rather than of individual signals). The feasibility and performance of any proposed signal modification would need further evaluation as part of the overall network.
- the reclassification of roadways within the study limits to roadway types associated with greater capacity thresholds to accommodate the traffic needs with or without the nominated land uses. The recommendations to reclassify the roadway for the future analysis have no justification. This unsupported assumption may allow the analysis to show better than actual conditions by using a higher theoretical roadway capacity. Any road reclassification would require approval from FHWA, State and County.
- the implementation of a TDM program to assist in reducing the impact of the proposed development. More detailed discussions and evaluation of potential proffers proposed by the APR Nomination 08-IV-8S to aggressively pursue a TDM program will be required at the rezoning stage. Other suggestions under the Transit

Service Improvements section lack detail and a procedural approach to effectively achieve the desired results.

- the addition of turn lanes and reconfiguring a left-turn lane to a through lane at the Boudinot Drive and Fullerton Road intersection. Though this is practical, it is not a viable solution for mitigating the impacts of the proposed development. For instance, at the intersection of Fullerton Road and Boudinot Drive, it has been proposed that one of the double WBL be reconfigured to a through lane. This solution could cause additional spillback problems given that the heavy turn volumes (350 vph) will be constrained to a single WBL turn lane of a limited storage length (295 feet). A better option would be providing additional right-of-way to accommodate the proposed turn lane additions instead of reconfiguring the turn lanes to through lanes

Cluster Impacts and Mitigation Measures: The traffic generated by the subject APR nomination and the surrounding nominated land uses would cause several of the roadway links to exceed the existing capacities.

For instance, based on link capacity estimates provided by the Fairfax County Department of Transportation, one of the roadway links (Alban Road between Boudinot Drive and Fairfax County Parkway overpass) currently operates beyond the existing roadway capacity. The analyses results for the future scenarios with or without the proposed APR nomination indicates that four additional roadway links will exceed the existing capacities. The critical links include:

- Alban Road, south of Boudinot Drive
- Backlick Road between Fullerton Road and Fairfax County Parkway overpass
- Backlick Road, north of Fullerton Road
- Fullerton Road between Boston Boulevard and Boudinot Drive

Based on the results of the report, it appears that if all nominations were approved within the I-95 (W) Industrial Area Cluster, the following modifications are likely to be needed:

- Widening Fullerton Road and Backlick to a six-lane cross-section and Alban Road to a five-lane cross-section within the limits of the study area,
- Providing additional right-of-way to accommodate the proposed turn lane additions instead of reconfiguring the turn lanes to through lanes.

Finally, added development intensity in the cluster area should be contingent on the reconstruction of or improvements to the I-95/VA-7100 interchange at Newington, completion of and ramp improvements to the Boudinot Drive/VA-7100 interchange (Fairfax County Parkway Extension Phase IV), and additional capacity along the future VA-7100 to accommodate additional development. The future VA-7100 extension will be opened in 2011 as a four lane facility with accommodations for widening to six lanes in the future.

Several issues have been identified during this review that would need further explanation, revision, or greater analysis during subsequent stages of the Chapter 527 process, should the proposed nomination be approved. If the application proceeds forward to the Traffic Impact Analysis phase, VDOT reserves the right to recommend modifications to assumptions used in these analyses.