



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

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November 10, 2009

Mr. Jaak Pedak
Senior Transportation Planner
Transportation Planning Division
Fairfax County DOT
4050 Legato Road, Suite 400
Fairfax, VA 22035

Re: Springfield Connectivity Study - Chapter 527

Dear Mr. Pedak:

In accordance with the Virginia Traffic Impact Analysis Regulations, 24 VAC 30-155, the proposed out-of-turn Plan Amendment was submitted to the Virginia Department of Transportation (VDOT) for review on August 11, 2009. It was anticipated the plan amendment would create a substantial impact or change to the existing transportation network of state highways.

We have evaluated the study and prepared written comments on the results of the evaluation. The report presents a summary of our key findings.

Please contact me if you have any further questions regarding this report.

Sincerely,

Noreen H. Maloney
Transportation Engineer

Enclosure

SPRINGFIELD CONNECTIVITY PLAN AMENDMENT PA S09-IV-FS1
Chapter 527 Submission Review

SUBMISSION CONTENT

The information provided by County staff, with the initial submission or during subsequent coordination, consisted of the following:

1. “**SPRINGFIELD CONNECTIVITY PLAN AMENDMENT S09-IV-FS1**,” report dated August 10, 2009 [received 8/11/2009]
 - a. Map outlining BRAC-APR nominations, Springfield CBC Land Units, overall Comprehensive Plan Amendment Study Area (dated July 2009)
 - b. Existing Comprehensive Transportation Plan map
 - c. Summary of proposed amendment, background and purpose (p. 1-3)
 - d. Review of BRAC APR Nominations for Springfield area (p 4-7)
 - e. Map depicting Transportation Recommendations west of I-95 (dated August 2009)

Appendices:

- A. Pre-Scope of Work Meeting Form
 - B. Land Use Quantifications and Trip Generation Tables (Options #1 and #2 in area of Springfield CBC only) – update received 11/3/09
 - C. Executive Summary of August 2008 Springfield Connectivity Study
 - D. FCDOT’s New Capacity-LOS Boundaries (Level of Service Volumes by Type of Roadway Facility)
 - E. BRAC APR Springfield CBC data: Map outlining nominations; V/C link analysis; Planned vs. Needed laneage
2. Four **Franconia Springfield Study Area Maps** (dated November 2009) depicting 2008 and 2030 Volumes and V/C ratios for study area road segments [received 11/3/09]
 3. **Transportation Recommendations for Franconia-Springfield Areawide Recommendations** in **Figure 3** (contained within draft staff report for Springfield Connectivity Study Plan Amendment, dated October 30, 2009) [received 11/3/09]

SUMMARY

The “Springfield Connectivity Plan Amendment S09-IV-FS1” was received by VDOT according to Chapter 527 guidelines on 8/11/09, with subsequent supporting data received during a 10/15/09 coordination meeting, and in a separate package on 11/3/09. The subject submission (herein referred to as *Springfield Connectivity amendment*) represents a compilation by Fairfax County staff of various efforts for the area. The reports stated that the primary focus of the Plan amendment is the approximately 590 acres in south-central Fairfax County that surround the intersection of I-95 and Old Keen Mill/ Franconia Roads, extending south to General Service Administration (GSA) warehouse (excludes residential subdivisions on the eastern portion of what is defined in the current Comprehensive Plan as the Franconia-Springfield TSA).

The study area, broken up into sub-areas and related analyses incorporated into the subject application, includes:

- a. **The Springfield Community Business Center (CBC) and Commercial Revitalization District (CRD)**, primarily located around the intersection of I-95 and Old Keene Mill Rd./ Franconia Road. The majority of the properties are located on the NW and SW quadrants of the intersection, with a small area on the NE quadrant. As part of Fairfax County's recent BRAC-related Area Plan Reviews (APR), several private nominations within these limits were analyzed as a group known as the *Springfield CBC cluster*. The related Chapter 527 submission analysis became the basis for transportation evaluation for this sub-area included by Fairfax County staff in the subject *Springfield Connectivity amendment*. The projected traffic volumes included in the previous Springfield CBC cluster analysis are higher than those anticipated with the proposed land use mixes proposed under the subject amendment. Hence the transportation analysis included with the subject amendment is considered conservative.
- b. **The Franconia-Springfield Transit Station Area (TSA)**. This area includes the Springfield Mall (Chapter 527 analysis of its planned redevelopment was previously reviewed under "Springfield Town Center" submission), planned conference center with support uses west of the Mall, the Joe Alexander Transportation Center (which contains the Franconia-Springfield Metrorail station, Virginia Railway Express (VRE) commuter rail station, and local and regional bus service), and the General Services Administration (GSA) Warehouse and adjacent development on the SE quadrant of the I-95/ Franconia-Springfield Parkway (Route 7900). The subject submission presented a graphical depiction of proposed transportation improvements. The submission did not contain a separate analysis of trip generation or resulting impacts to the transportation system for the area east of I-95 because the land use plan for that area of Springfield is not proposed for change.

The 2008 Springfield Connectivity Study is mentioned by reference and a copy of Executive Summary is included as Appendix C. FCDOT staff clarified that the 2008 study (<http://www.fairfaxcounty.gov/dpz/springfield/>) is not part of this submission for review, although specific transportation recommendations, land use and urban design guidelines applicable to the overall study area are being carried forward under this submission. Review of both these general areawide guidelines and of specific transportation improvements is included in the following section.

REVIEW COMMENTS

A. Land Use And Urban Design Guidelines

The subject *Springfield Connectivity Plan Amendment Study* (herein also referred to as *Springfield Connectivity amendment* or simply "subject amendment") notes the following goals: promoting revitalization, encouraging mix of land uses, creating multimodal transportation network. To achieve the goals, guidance is proposed on jobs-to-housing ratio

(more mixed-use development opportunities), intensity, and urban design. (Proposed specific major street improvements are reviewed later, in Section B of this report).

- a. **Jobs-to-housing ratio of 3.0.** The most important County guideline is a jobs-to-housing ratio for the study area as close as possible to 3.0 (to create more mixed-use development that provides some synergy between land uses and helps revitalize the commercial area). The subject study does not provide background or explain how this particular ratio was selected as an achievable target. Nevertheless, planning reviews have indicated that well designed mixed-use developments, where a portion of the people working there live and/or shop nearby (ideally within walking distance or within circulator or biking distance of rail transit), will generate fewer auto trips than similar-sized developments with single or less compatible uses. This “internal capture” is accounted for in transportation analyses by taking trip reductions to typical auto trip generation calculations. Another advantage of mixing housing and jobs is that the area experiences human activity throughout the day, rather than limited to workday hours, as is the case with concentration of only jobs.
- b. **Circulator Bus.** Additional guidelines include reliance on a circulator bus service. This is intended to extend the influence of Metro and improve connectivity between both sides of I-95. As bus/shuttle circulator system is designed, it is suggested that frequent headways be considered for traditional AM and PM peak periods, and also for the lunch period: this will have the effect of discouraging auto usage by facilitating alternative transportation during lunchtime for commuters who would otherwise drive to work and residents who would otherwise jump in their cars. In addition, literature reviews have indicated that the availability of reliable shuttle bus system between (a) site(s) and a transit station, can have a significant effect in increasing the proportion of transit users. As development occurs, contributions toward a bus circulator system by land use proposals may make such a system more viable. Such contributions could be in the form of monetary contributions, provisions for bus shelters, Transportation Demand Management support elements within a development complex, etc.
- c. Focus on “**complete streets**” that incorporate pedestrian and bicycle transportation. The *Springfield Connectivity Plan Amendment Study* submission contained an Executive Summary of the August 2008 “Springfield Connectivity Study;” Figure ES-4 contains an illustration of cross-section diagram, incorporating several multimodal elements (sidewalks separated from the street by a buffer, bike lane between curb-side parking and travel lanes); no dimensions are provided in the illustration. FCDOT staff clarified that the subject submission does not include the 2008 study and no review comments on that study are anticipated.
 - o VDOT applies Context Sensitive principles in design of road cross sections and when reviewing specific road design proposals. In general VDOT considers AASHTO design standards when evaluating minimum requirements for transportation system elements (such as width of road lanes, sidewalks, bike land or multi-use trails, etc), while taking into account land mix for the area and anticipated predominant users of the transportation system. For example, a wider lane width (for at least 1 lane) would be preferable where wide vehicles such as buses are anticipated to be significant users. It is important that bike users have access to facilities that connect (whether on- or off-the road).

- ADA requirements. The plan should note that conformance with ADA standards is required (such as for curb ramps, facility widths, sign placements, requirements for bus shelters, etc).
- Where a grid of local streets is proposed, proper consideration should be given to treatment of intersections (spacing; use of right-in, right-outs to avoid closely spaced signalized intersections that may reduce corridor capacity; median breaks and access management regulations, etc).
- It is noted that, in his October 14, 2009 letter to Fairfax County Board of Supervisors Chairman Sharon Bulova, Commonwealth Transportation Secretary Pierce Homer suggests the formation of a workgroup of VDOT and Fairfax County DOT staff to develop street standards for areas with urban context.

Access Management. As redevelopment occurs and a grid of local streets is added, it is important to consider access management. Opportunities to consolidate and properly space entrances should be pursued to improve operations along streets and reduce conflicts with pedestrians. We recommend specific reference to VDOT's new Access Management regulations in the Plan text, where applicable. Access Management Regulations for Principal Arterials went into effect on July 1, 2008. Access Management Regulations and Standards for Minor Arterials, Collectors, Local Streets Requirements became effective on October 14, 2009. Details can be found at <http://www.virginiadot.org/projects/accessmgt/default.asp/>.

B. Transportation Analysis for Northern and Western Sections of Study Area

NE and NW Quadrant: This section includes the Springfield Community Business Center (CBC), primarily on the NW quadrant of the Franconia-Old Keen Mill intersection with I-95 (defined in the next paragraph). The Springfield Community Revitalization District (CRD) includes the CBC as well as a small area just east of I-95.

As part of the recent **BRAC-APR Review process** Fairfax County grouped land development applications into "clusters", based on professional judgment of the common transportation network elements impacted by the proposals. The Springfield Community Business Center (CBC) cluster on the west of I-95 on both sides of Old Keen Mill Road, had several parcels with proposed amendments, labeled 08-IV-##. To date, ##s 4FS, 8FS and 11 FS have been adopted by Fairfax County, while the remaining were withdrawn (10FS) or were deferred (5FS, 7FS, 9FS). The large Springfield Plaza site, which occupies a significant portion of the Springfield CBC, did not submit proposed revisions.

The subject *Springfield Connectivity Plan Amendment Study* considers two plan amendment options (#1 and #2) for the Springfield CBC area, with well-defined land use mix for each of six Land Units (A-C, D-1, D-2 and E) as depicted in Appendix C (Figure ES-1 of the 2008 Springfield Connectivity Study Executive Summary). Each Land Unit includes two or more uses (housing, retail, office, hotel, etc.).

The Table on page 8 of the submission includes a Trip Generation Comparison (assumed year is 2030) for various scenarios, starting with the current Comprehensive Plan. The

“Land Use Data Quantification” spreadsheets included in the subject submission contain derivation of trips for each land unit, based on trip rates from the Institute of Transportation Engineers (ITE) Trip Generation report, 8th edition, 2008 (latest available). This methodology is used industry-wide and is recognized in the Chapter 527 guidelines. Trip reductions (transit, pass-by and internal capture) appear reasonable both in terms of percentage and land use applied to; however, due to distance to rail facilities, any significant transit trip reductions can only be achieved with a robust and well-designed bus/shuttle support system. It should be noted that the “quantification” of trips provided does not take into account the fact that three of the proposed Area Plan Review revisions within the Springfield CBC boundaries have already been adopted. The only deferred sites include 08-IV-5FS, -7FS, and -9FS. Even though the approved sites are generally the smaller ones, this may limit the County’s ability to achieve the target jobs-to-housing ratio and preferred land use mix for the area, which may in turn affect the actual “internal capture” trip reductions achieved.

For purposes of this Chapter 527 application, the study text indicates that Option #2 is the preferred option for the Springfield CBC area. Trip generation under this Option would be considerably lower than if the BRAC Task Force recommendations were implemented (about 20% and 30% lower during PM and AM peak hours, respectively).

Option #2 trip generation is also lower than under the BRAC APR Springfield CBC analyses. During an October 2009 coordination meeting, Fairfax County DOT staff clarified that the subject submission’s transportation analysis for the study area’s northern and western portions, conservatively used the approximate traffic volumes and patterns derived during the BRAC-APR Springfield CBC cluster analyses, which incorporate the future Springfield Town Center volumes. The table below was prepared to facilitate further comparison: the two bottom lines present comparison of trip generation with the currently adopted Comprehensive Plan and help explore relationship between preferred Option #2 trips and those that would be generated under the BRAC-APR Springfield CBC cluster.

	Sub-Area Trip Generation Estimates (approximately for Year 2030)							Source
	Daily	AM			PM			
		IN	OUT	TOTAL	IN	OUT	TOTAL	
Current Plan	85,990	5450	1560	7010	3010	6090	9100	1
Option #2	95,770	4590	1720	6310	3680	5880	9560	1
Difference Opt #2 w/ Comp. Plan	+ 9780			- 700			+ 460	Comp.
Net new trips for BRAC APR Springfield CBC (diff. w/ Comp. Plan)	+21,702			+ 2969			+ 3087	2

Sources:

1. Submission report, pg. 8

2. VDOT's review comments to Springfield CBC cluster submissions (4/09)

Comparing preferred Option #2 trips with Current Comp. Plan trips indicates that, although daily trips would be approximately 11% higher than under the current Comp. Plan, peak hour trips were estimated to be only about 5% higher for PM peak hour and actually lower in AM peak; this apparent discrepancy is attributed to better land use mix, and use of bus transit to extend the reach of the rail transit station and achieve non-auto trip reductions.

The trips generated by the recently proposed BRAC APR Springfield CBC cluster nominations would have significant impacts on the surrounding transportation system (these are discussed below). Proposed daily trips from Option #2 are clearly lower than those for the Springfield CBC cluster (resulting in reduced transportation impacts) and peak period trips would not be substantially different from those associated with the current Comprehensive Plan. For those reasons VDOT supports the proposed land uses under the subject amendment (Options #1 or #2) over those assumed under the BRAC APR applications for the Springfield CBC.

Technical Review of Transportation Impacts

As mentioned, FCDOT has conservatively assumed traffic volumes and assignments similar to those in the Springfield CBC cluster analyses for the purposes of generating and analyzing improvements to mitigate impacts of the proposed land use amendments. Consequently VDOT's review below makes frequent reference to the Springfield CBC cluster results. In April 2009 VDOT posted review comments on the various Chapter 527 submissions for the Springfield CBC area. Fairfax County established an analysis methodology for applicants to follow; VDOT's review at that time substantially agreed with the main elements determined by FCDOT and provided to Springfield CBC applicants:

- methodology to derive background traffic projections, which relied on the use of Fairfax County's travel demand model (based on the MWCOG/CLRP with Round 7.1 land use)
- methodology to assign trips to intersections and road segments, and overlay of additional trips generated by each proposal
- assumed road capacities for various road classifications (order of magnitude values were considered reasonable for planning-level evaluations, such as Comprehensive Plan amendment reviews)

The subject Springfield Connectivity Plan Amendment Study submission contained a summary of v/c ratios for various study area road segments (obtained from BRAC-APR Springfield CBC cluster analyses, which also incorporates Springfield Town Center volumes). A map with projected 2030 volumes for the proposed transportation network was forwarded by FCDOT to VDOT toward the end of the review period. Spot checks of volumes used in the map indicate general consistency with those in Traffic Impact Analysis submissions for the Springfield CBC cluster previously reviewed by VDOT under the BRAC APR nomination process. We can thus concur with the (conservative) traffic volumes used in this analysis for this portion of the study area. Key findings of the Springfield CBC cluster analysis are summarized below.

- Based on Fairfax County’s link capacity estimates, there are several roadway links within the study area that were found to operate beyond their capacity (defined as links with volume to capacity ratio, or v/c, above 1.0), with or without the proposed nominations:
 - o SB Amherst Ave. (Bland St to Essex Ave.)
 - o Backlick Rd (Amherst Ave to Franconia-Springfield Ave.)
 - o NB Bland St (Old Keen Mill -Backlick)
 - o NB Brandon Ave (I-95-Commerce and Commerce –Essex)
 - o SB Spring Rd (S. of Old Keene Mill Rd.).
- The summary of V/C ratios resulting from the Springfield CBC link analysis indicate that, for the “2030 Conditions with Out-of-Turn Amendments with All Nominations in Cluster” (last column in table), the following road segments would be operating above capacity (V/C exceeding 1.0):
 - o Amherst Avenue (SB between Backlick Rd. and Essex Avenue)
 - o Backlick Road (Amherst Ave/Calamo Road to Franconia-Springfield Parkway): AM and PM, V/Cs up to 2.8.
 - o Bland Street (NB between Old Keen Mill Rd. and Backlick Rd).
 - o Brandon Ave (NB between Commerce and Essex)
 - o Spring Road (NB and SB, south of Old Keene Mill)
 - o Springfield Boulevard (WB between Backlick and Old Keen Mill, VC of 2.6 in AM peak)
- The study did not examine traffic impacts to I-95. A very broad review performed by VDOT of the effect of added trips generated by all proposed BRAC-APR nominations, noted v/c deterioration of roughly 5% along I-95 and main roads surrounding the proposed amendments. However, these impacts would be reduced under Options #1 and #2 in the subject amendment due to the reduced trip generation, compared to the Springfield CBC trips analyzed under the BRAC-APR nominations, so that Options #1 and #2 are preferred over the land uses assumed in the Springfield CBC cluster submissions.

According to the current Fairfax County’s Transportation Plan, the following improvements are planned within the vicinity of the Springfield CBC:

- i. Widening of Bland Street to a 4-lane section
 - ii. Widening of Franconia-Springfield Parkway to an 8-lane section
 - iii. Widening of Old Keene Mill Road to a 6-lane section west of Commerce Street
 - iv. Widening Amherst Avenue to a 4-lane section (between Commerce Street and Cumberland Avenue)
 - v. Interchange improvements to the Franconia-Springfield Parkway / I-95 Interchange to permit low-occupancy vehicle access to/from I-95.
- Considering the combined trips generated by the APR nominations in the cluster the following additional modifications were identified as likely needed to the County’s Transportation Plan:
 - vi. Widen Backlick Road between Amherst Ave/ Calamo Road and Franconia-Springfield Pkwy
 - vii. Widen WB Springfield Blvd. between Backlick Road and Old Keene Mill Road

viii. Widen Spring Road south of Old Keene Mill Road.

The following recommendation in the 2008 Springfield Connectivity Study were carried forward into this subject *Springfield Connectivity amendment* submission for the combined NE, NW and SW quadrants of the overall study area.

- Construct new Backlick Rd. bridge over Old Keene Mill Rd. (this would replace the existing 2-directional at-grade intersection and allow for the 3-lane eastern side of the Backlick/Amherst 1-way pair).
- Convert Amherst Ave. and Backlick Rd. into 1-way paired streets (only the portion north of Essex Ave. is currently a 1-way pair; proposal is to provide 1-way pair, 3-lanes in each direction, all the way from Calamo Street to Cumberland Avenue).

In addition to these two improvements, the 8/09 map (following page 10 of subject report) shows the following upgrades:

- widen Backlick Road to 6 lanes south of Calamo Street
- connect Commerce Street (arched portion) to Spring St. at Old Keen Mill Road intersection, and to 4-laned Bland Street).

Following are comments and additional considerations related to these roadway improvements proposed in the subject amendment:

- Analysis indicates the proposed measures would result in improved road system performance: V/Cs for both AM and PM peak conditions would be **at or below capacity (V/C <= 1.0) for the majority of the road segments examined**, which VDOT supports. This performance addresses the majority of the problem areas identified as part of the Springfield CBC cluster analysis.
- The only four exceptions to adequate V/C ratios noted in the map are as follows:
 - o V/C of 1.1-1.2 is shown along NB Brandon Ave.: this north-south segment is approximately parallel to Backlick Road, whose V/C under 0.9 suggests available capacity for some of the traffic to divert during the most congested times.
 - o SB Spring Road is noted to operate just over capacity during the PM peak. As listed earlier, the Springfield CBC cluster analysis had identified widening of this road as a potential need beyond the improvements in the current Comprehensive Plan. However, it is again noted that the volumes used in the analysis are considered conservative.
 - o Loisdale Rd. north of Spring Mall (V/Cs up to 1.1 NB AM and 1.2 SB PM). It should be noted that the Springfield Town Center application included proposed operational and localized capacity improvements along this segment of Loisdale Road, intended to mitigate projected traffic conditions.
 - o Spring Mall Road EB in PM is projected to have the worst V/C (1.7) of the study area. The analysis however does not incorporate the traffic diversion that can be anticipated to occur with the extension of Frontier Drive south toward Springfield Center Drive and Loisdale Road. If implemented, that extension would provide alternate routes for traffic from points south of the Franconia-

- Springfield Parkway headed to the Joe Alexander Transportation Center and the Parkway, which would help ease congestion along Spring Mall Rd.
- Analysis indicates the proposed Amherst Street/ Backlick Street 1-way pair would improve overall transportation system performance in the corridor and appears to be a workable solution, which VDOT supports as follows:
 - o Capacity link analysis indicates all segments south of Commerce Street operating at V/C at or below 0.9.
 - o Benefits to one-way pair operation include improved safety (by eliminating left turn conflicts and making it easier for pedestrians to cross), and operational improvements (additional green time for heavy through movements at signalized intersections)
 - o Currently the Amherst Ave/ Backlick Rd pair north of Essex Avenue already operates as a 1-way pair: the proposal would extend the treatment south to Calamo Road.
 - o Turning a 2-way 4-lane section into a 1-way 3-lane section in a sense may free some “pavement” which can be used for bus pull-offs and/or street parking.
 - o Backlick Road bridge over Old Keene Mill Rd.: since no left turns are currently allowed at this intersection, the main movement that will be rerouted as a result of the bridge is the NB to EB turn (the 1-way pair will shift SB turns to Amherst Ave.).
 - o Consideration of individual area merchants who may prefer added visibility of 2-way traffic. This concern could partially be counteracted with the expectation that additional bus route access would potentially expand their customer base.
 - The proposed widening of Backlick Road south of Calamo Rd toward Franconia-Springfield Parkway to 6 lanes is consistent with the recommendations in the Springfield CBC cluster analysis reviewed by VDOT in April 2009 as part of the BRAC APR submissions.
 - The proposed additional connections between Commerce Street, Bland Street and Old Keene Mill Road will help improve traffic distribution. Depending on sight distance conditions and Access Management guidelines, right-in, right-out treatments may be applicable (to be evaluated in subsequent land development stages).
 - Springfield Boulevard (Backlick Rd. to Old Keene Mill Rd) is proposed to be widened to 4 lanes. The need for this widening is supported by the planned transit center / 1,000+ space park & ride garage and joint development envisioned for the current Circuit City site.

C. Transportation Analysis for Franconia-Springfield Transit Station Area (Southeastern Section of Study Area)

The subject submission presented a graphical depiction of proposed transportation improvements for this sub-area. The submission did not contain a separate analysis of trip generation or resulting impacts to the transportation system for the area east of I-95 because the land use plan for that area of Springfield is not proposed for change. Hence the review below is limited to general comments.

- **Extension of Frontier Drive.** The subject submission includes a recommendation to extend Frontier Drive south of its current intersection with the Franconia-Springfield Parkway as a 4-lane facility to terminate at Loisdale Road. The extension would interconnect with the GSA warehouse area roadway network and provide a much-needed alternative for trips from the south headed to the Franconia-Springfield transit center, points north along Frontier Drive, and trips headed toward eastbound 7900. The resulting trip redistribution would help alleviate congestion along Loisdale Road north of Springfield Center Drive, and along Spring Mall Drive. Concurrent with extension of Frontier Drive, it is important to provide good pedestrian and, where possible, bicycle access, both to minimize auto-use and to promote use of transit mode available at the Joe Alexander Transportation Center.
- **Loisdale Road.** A separate study of this road, south of the study area, was recently completed by Fairfax County/ their consultant. That study was submitted to VDOT under a separate Chapter 527 submission on 11/3/09, and is being reviewed under that submission.
- **Traffic Impact Analysis for the Springfield Mall Town Center Rezoning application** (RZ 2007-LE-007) was reviewed in detail under a previous Chapter 527 submission; please refer to any applicable proffers and VDOT's review comments on that submission. For example, efforts to provide full pedestrian and, to the extent possible, bicycle access to the transit station from points north of Route 7100 are very important to achieve auto-trip reductions and promote transit use. The grid of streets within the Springfield Town Center area was largely determined during the rezoning process. It should be noted that the extension of Frontier Drive, which would cause redistribution of traffic in the area, was not considered in that TIA analysis. It is possible that the resulting traffic redistribution, by providing alternative access points to the transit center and other points north, would actually ease anticipated congestion along Spring Mall Road and road segments to its west currently carrying traffic bound to Spring Mall Road.