

TO: Boulder City Council, et.al.
FROM: Harlin Savage, 1050 Tantra Park Drive, and the Tantra Park residents listed at the end of this memo.
DATE: 2-18-2021
SUBJECT: CU and Fox Tuttle Hernandez draft transportation analysis

The City is not paying enough attention to the negative impacts of congestion and increased traffic that CU's proposed development will create in the Tantra Park neighborhood.

The Fox Tuttle Hernandez (FTH) draft transportation study, commissioned by CU, is both inadequate and inaccurate in its conclusions. Further, the tools used to develop those conclusions are flawed. As residents and homeowners in the Tantra Park neighborhood, we feel compelled comment on the study's flaws and to demand that it not be used to inform transportation decisions. City Council should reject the draft study, which is biased in ways that significantly underestimate the negative quality-of-life, traffic, and safety impacts that CU's proposed new campus—with a footprint the size of main campus—will inflict on the Tantra Park neighborhood.

Not only would the new campus negatively affect life for Tantra residents, it also would provide no compensatory benefits them. None. Zero. Further, even the proposed flood mitigation plan for the South Boulder Creek floodplain will fail to help our neighborhood, notwithstanding that it, too, suffered damage from the 2013 flood. And despite the efforts of one of the neighborhood HOAs to arrange a meeting with the City, we have not had the opportunity to attend any webinars or and ask questions of city planning staff.

Here is our list of concerns and questions:

Traffic and safety are already big concerns

There is only one way for vehicles to enter the neighborhood and one way out. There is only one stop sign in the entire neighborhood—at West Moorhead and Tantra Drive. Excluding Tantra Drive, the other side streets and cul-de-sacs are narrow and hard to maneuver, especially when school buses, delivery trucks, recycling trucks, and super-sized pick-up trucks are on the streets. Cars are often parked bumper-to-bumper, and on Tantra Drive it is bumper-to-bumper on both sides of the street.

Safety

The Tantra Park neighborhood includes a small shopping center, Summit Middle School, The Bixby School, a Morning Star Memory Care facility. A liquor store, which gets a lot of traffic in the late afternoon and evening, is located directly across Tantra Drive from the memory care facility, which itself has frequent ambulance, health care and delivery service traffic. Middle school students use the crosswalk on Tantra Drive just past the memory care facility is used 5 days a week, and there is

additional foot and car traffic for soccer and ultimate Frisbee practices and games. And because this is Boulder, significant pedestrian traffic exists from senior citizens, kids, college students, cyclists, pets, and other residents, as well as people seeking to access the park and other recreational activities.

Yet there is nothing in the draft FTH study about how an increase of 7,000 cars trips daily (according to FTH's own estimates), which is three times what we have now, will affect safety, noise, congestion, and pollution in the neighborhood.

At the very least, the Transportation and Mobility Department, the Transportation Advisory Board, and staff in charge of implementing Vision Zero should review and provide comments on the draft study. It's their job is to protect Boulder residents and keep our roads safe.

Three recent safety risk examples are illustrative:

- At one point, a neighbor was so upset that she tried to get speed bumps installed. Predictably, she failed, because the City seems to ignore the existence of the Tantra neighborhood.
- While turning left from Tanta Drive to Table Mesa, a car hit my husband, who was riding by on his bicycle.
- One neighbor, who works for CU, moved to Superior, because she grew tired of finding people parked in front of her house all the time, blocking her driveway. One of them even hit her car while trying to back out.

Flawed Study Minimizes Negative Impacts

Those of us who have read the FTH draft study concur with comments from our Martin Acres neighbors as to the methodological flaws in the study. Those flaws have led to false conclusions about the alleged minimal impacts of new roads, thousands of new residents, and their vehicles. These impacts cannot be termed "minimal." Only if CU banned all vehicles from the proposed campus other than emergency vehicles could the impact be conceivably minimal. However, if that is the plan, then why does CU want parking for hundreds of vehicles on the site?

Here are excerpts from the Martin Acres Neighborhood Association's critique of the FTH document with which we agree:

- **PROBLEM 1:** Biased traffic count methods: Nov. 17, 2020. FTH began its traffic count in South Boulder. The final day of traffic counting was Nov. 19, 2020. Please refer to pages 94 - 192 of the FTH report, which document the traffic count data collected by FTH. If you look at the top of any and all of those pages, the only three dates you will consistently see are Nov. 17, 18, and 19, 2020.

- FTH's traffic count coincided *precisely* with the removal of **46,077 total individuals who normally travel** to schools located in South Boulder (CU + the named K-12 schools) because the pandemic caused schools to close.
- For reference, **46,077** is equivalent to nearly 43% of the total 108,000-person population of Boulder. While we don't assume that every one of these 46,077 individuals drive or are driven to these South Boulder learning institutions, even the most aggressive adjustments for alternate modes would have still placed tens of thousands of education-related commuters on the roadways, the week prior to the traffic count.
- Bottom Line: FTH not only did their traffic count during the general, already underlying, reduced traffic of COVID... *their traffic count appears to have been timed to occur amid an additional, extraordinarily acute further reduction in traffic, that went well beyond the generalized COVID impact.*
- The problem? This drastic undercount of traffic will be used as the "starting point baseline," onto which CU's further traffic projections will be superimposed. Obviously, the more CU can lower its "starting traffic number," the lower its "ultimate traffic number" will be, once the additional 7,000 vehicle trips per day from CU South* are added. *Source: FTH, in this same report.
- **PROBLEM 2:** Understating the “multiplier” used to adjust for COVID-related traffic decreases and cherry-picking data to reduce negative impacts: FTH's study grossly under-stated the traffic "multiplier" that is supposed to a) recognize COVID -related diminutions of traffic during their November 17-19, 2020 traffic count and b) add a multiplier that takes into account the November 2020 COVID impact when projecting future traffic for future, non-COVID impacted years. Obviously, when the multiplier is grossly understated, the final number of projected traffic counts will be grossly under-stated.
- **The multiplier should have been 1.45**, according to the actual month FTH chose to count traffic in. FTH is obligated by every statistical imperative to pick a month, and stay with a month. Proper statistical science does not allow the practice of arbitrarily jumping from month to month; to cherry pick the most advantageous excerpts, for the client's case.
- In projecting future traffic totals, the difference between using a multiplier of 1.33 and 1.45 is huge. When dealing with thousands – potentially tens of thousands of vehicles – a multiplier error of this magnitude will result in significantly lower (and wildly inaccurate) traffic projections.
- When you combine a low-ball multiplier, with an extraordinarily low-ball baseline starting traffic count, you wind up with a "double-whammy" underestimate, with errors of huge magnitude.
- In essence, FTH got the absolute lowest 2020 traffic count they could find, for an exceptionally low baseline onto which all future traffic increases would be superimposed, and they additionally (and incorrectly) assigned the lowest multiplier they could find (by using the least COVID impacted month they could find.) As such, this traffic study cannot be viewed as legitimate.

- **PROBLEM 3:** Failing to analyze impacts to major streets: - FTH asserts that absolutely none of the additional 7,000 vehicle trips per day due to CU South will impact Moorhead Ave., the obvious, diagonal shortcut route from CU South to Main Campus, which cuts straight through our neighborhood of Martin Acres.
- On Page 17 (Page 20 by Google Chrome's page counter) of its CU South traffic study, FTH assigns "percentage distributions" of the traffic that will be generated by CU South. For example, it assigns 20% of the traffic to South US 36, 25% to North US 36, etc. *But 0% is assigned to Moorhead.*
- We cannot fathom how FTH can assume that no motorists traveling between CU South and CU's Main Campus would use the obvious, straight-as-an-arrow 1.5-mile diagonal shortcut of Moorhead Ave., right through Martin Acres. This is now the third element of FTH's traffic study that fails basic logic. Please see the screen shot below, that illustrates why Moorhead Ave., if anything, is likely to receive *more* CU South related traffic than any other roadway.
- The fact that Moorhead Ave. is not mentioned anywhere, in trip distribution, is a third reason to reject the CU South traffic study authored by FTH.
- For all the reasons stated above, we ask the City of Boulder to reject the Fox Tuttle CU South traffic study that was commissioned by CU, and instead, hire an independent traffic study to be done by a firm not on CU's payroll.

Additional Questions:

- Why does CU want a road connecting its property to SH 93? Does it anticipate thousands of commuters from Golden and Lakewood? How do we know that road will not become a short cut for people trying to avoid traffic on Table Mesa? How will cyclists and others who use the Marshall Road be affected?
- CU wants to connect Tantra Drive to South Loop Road and the report says that Tantra Drive will be a tertiary option only for drivers. What exactly does that mean and how will current residents be affected?
- Will heavy machinery use Tantra Drive? If so, who will pay for road damage?
- What safety precautions are being made to protect children, seniors, families, dogs, and other pedestrians who use Tantra Drive every day?

The issues and questions raised here must be addressed before any annexation agreement can be considered. I support staff's request to CU for a more much detailed traffic study, as well as MANA's request for an independent third party, which would not be paid by the developer, in this case CU, to step in.

CU's proposed south campus is of zero benefit to Tantra Park residents, who won't even benefit from the city's flood mitigation project. Traffic will increase three-fold

and probably above the 7,000 vehicle trips the study anticipates, with all of the safety hazards and inconveniences that entails. Our quality-of-life will be diminished, and even our property values may drop, at least during the 10-20 years of construction.

There is a better option, which would not needlessly harm our neighborhood, and that is for CU, with the city's support, to move its desired new campus to north Boulder. The city owns 500 acres within the North Boulder Planning Reserve, which is dedicated for housing, and CU could potentially have more room without having to contend with building in a major floodplain.

Thank you for considering our concerns,

Harlin Savage

Stephen Angus

Add your name here ??????????

CC: Transportation Advisory Board, Planning Board, Phil Kleisler, Jean Gatza, Chris Meschuk, Jacob Lindsay, Joe Taddeucci.