



February 14, 2020

City of Gallup  
110 West Aztec Avenue  
Gallup, NM 87301

ATTN: Gallup City Manager Maryann Ustick and Gallup City Council

RE: Wilson Development Park, corner of NM 602 and Park Avenue

Ms. Ustick,

The New Mexico Department of Transportation (NMDOT), District 6, has been in discussion with Gallup Public Works Director, Mr. Stan Henderson, regarding the proposed Wilson Development Park, located at the north-east corner of the intersection of Park Avenue and NM State Route 602, within the City of Gallup, New Mexico. In these discussions, the need for a NMDOT Access Permit, supported by a Site Threshold Analysis (STA) and possibly a Traffic Impact Analysis (TIA) was reviewed and determined to be necessary in order to 1) bring the NM 602/Park Avenue intersection into conformance with rules outlined in the NM Administrative Code (NMAC), and to 2) identify and mitigate potential impacts of the Wilson Development Park development on the highway system.

The intersection of NM 602 and Park Avenue is not currently a NMDOT permitted access. This city street and its connection to NM 602 predates NM Access Management Standards and many of the rules outlined in NMAC 18.31.6 State Highway Access Management Requirements. With the coming of the Wilson Development Park, it will be necessary for the City of Gallup to obtain a permit for this access and ensure that its design will meet traffic demand projected for this new development.

As provided in New Mexico Administrative Code 18.31.6.6 (A), "Rule 18.31.6 NMAC, and its associated *state access management manual* which is attached to and filed concurrently with this rule, provides procedures and standards to preserve and protect the public health, safety and welfare, to maintain smooth traffic flow, and to protect the functional level of state highways while considering state, regional, local, and private transportation needs and interests."

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District 6

NMAC 18.31.6.14(F)(1) sets forth the requirement that local governments provide notice to the NMDOT of all developments that will have a direct or indirect impact on a state highway:

- (a) Local governmental agencies shall provide notice of all developments that will direction or indirectly impact the state highway, and shall request Department participation in the administration of an access permit if it is determined by the Department that an access facility will directly or indirectly impact the operation and function of a state highway. The local governmental agencies may also require sub-dividers to provide additional notice of all proposed developments that will directly or indirectly impact the state highway.
- (b) Where a private development accessing the roadway of an appropriate local authority necessitates access improvements where the local roadway connects to a state highway, the permittee shall be the local jurisdiction.
- (c) Local governmental agencies may be required to submit a traffic engineering evaluation with a permit application. The traffic engineering evaluation requirement shall be determined according to the procedures described in 18.31.6.15 NMAC and 18.31.6.16 NMAC. Local governmental agencies may require developers to assist in preparing and providing this information for submission to the state.

The NMDOT has determined that access improvements at the intersection of Park Avenue and NM State Route 602 will likely be warranted due to traffic generation expected by the Wilson Development Park. At a minimum, a Site Threshold Analysis (STA) “shall be required of all developing or redeveloping properties that directly or indirectly access a state highway. The STA should examine existing roadway volumes and trip generation estimates to determine if additional traffic analysis is required.”(NMAC 18.31.6.16(C)). Pursuant to the results of the STA, “[a] TIA (Traffic Impact Analysis) **shall** be conducted for each new development or property redevelopment when: (a) the results of a STH indicate that the proposed development is expected to generate 100 or more peak-hour total trips ... .” (NMCA18.31.6.16(D)(1), emphasis added).

A significant increase in traffic is expected as a result of the proposed development. The Lumber Store by itself is to be 55,429 S.F. in size. Utilizing established Trip Generation Rates (ITE Trip Generation Manual, 9<sup>th</sup> Edition), NMDOT estimates that this development could generate **527 trips in the Saturday Peak Hour** (Average rate of 9.58 trips per 1,000 SF gross floor area). That’s potentially 500 more turning movements from NM 602 onto Park Ave. in a single hour. This projected traffic generation far exceeds the 100 peak hour trip threshold found in NMAC 18.31.6.16(D)(1) for a TIA. Traffic generation of this volume may in turn cause expected Level of Service (LOS) standards to fall below applicable standards for the

intersection and for Park Avenue, thus adversely impacting the state highway system and public safety. The completion of a full Traffic Impact Analysis will be necessary to evaluate this possibility and to identify ways to mitigate these impacts.

As per NMAC 18.31.6.14:

(C) Applications for access permits shall be made by the property owner; the property owner's authorized representative; or, the local governmental agency requesting access from a state highway. Applications are required for all new access types, for modification or transfer of existing lawful access permits, and for upgrading an existing illegal access to a lawful access.

(1) Changes in Property Use: Where additional traffic is projected due to expansion or redevelopment of a property, the property owner shall contact the Department to determine if a new permit application and modifications to existing access points will be required. If the Department determines that the increased traffic generated by the property does not require modifications to the existing permitted access, according to the procedures of 18.31.6.16 NMAC, a new permit application will not be required.

The City of Gallup should consider itself as the owner of the access to State Route (SR) 602 from Park Avenue. Due to the increase in traffic to be generated by the proposed development, NMAC 18.31.6 requires the City of Gallup to complete the following actions:

1. Pursue an state approved Access Permit for the intersection of Park Avenue and NM 602.
2. Complete a Traffic Impact Analysis (TIA) to support the City's Access Permit Request.

Again, as per NMAC 18.31.6.14(F)(1)(b), "Where a private development accessing the roadway of an appropriate local authority necessitates access improvements where the local roadway connects to a state highway, the permittee shall be the local jurisdiction." However, the City may require developers to assist in preparing and providing this information.

Please consider this letter as official notice of the City's responsibility to seek an approved Access Permit for the intersection of Park Ave. and NM 602 and complete a full Traffic Impact Analysis in support of the newly proposed development.

Respectfully,

  
Jayson L. Grover, P.E