



January 28, 2021

Mr. Louis Schulman, Chairman
Norwalk Zoning Commission
City Hall
125 East Avenue
P.O. Box 5125
Norwalk, CT 06856-5125

Re: #6-20SP - 10 Norden Place #A
Application by Norden Place KB LLC for Special Permit

Dear Mr. Schulman and Members of the Commission,

A Traffic Impact & Access Study (TIAS), dated June 1, 2020 was prepared by Tighe & Bond for the proposed project located at 10 Norden Place. Attorney Joel Z. Green, of the Law Offices of Green and Gross, P.C. as counsel for the Sasqua Hills Neighborhood Association, has retained our firm, SIMCO Engineering, D.P.C. (SIMCO), to review the TIAS and other relevant traffic information pertaining to the Special Permit application to convert 330,000 square feet of space in an existing industrial building to warehouse and distribution space.

Based upon on a review of the available traffic reports and data, SIMCO offers the following observations:

TRIP GENERATION

The Applicant has represented to the Commission that it does not have a specific tenant for the 330,000 square feet of space that is subject to the Special Permit being sought to convert the existing building to warehouse and distribution space. However, a Facilities Management and Operations Plan was provided by the Applicant states that, based on the square footage, there would be 100 employees working at the facility. The Applicant also disclosed that the site would most likely be used as a business-to-business warehouse. Based on this input, the TIAS uses Land Use Code 150 'Warehousing' published in the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017 to estimate both passenger vehicle trips and truck trips to and from the site.

From a practitioner's perspective the use of Land Use Code 150 (10th Edition), especially in the absence of a definitive tenant, is problematic. The High-Cube Warehouse (HCW) market saw individual tenants/owners implement business plans to better accommodate the needs of e-commerce. In response, the ITE implemented major changes in the Trip Generation Manual 10th Edition to account for this. In the ITE Trip Generation Manuals, up to and including the 9th Edition, the Land Use Code 150 'Warehousing' included a wider range of sites in the data set as

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there were few other representative land use codes that applied to warehousing. The difference with the 10th Edition is that warehousing and HCW land uses have been disaggregated into six distinct categories. This has more narrowly defined the Land Use Code 150 'Warehousing' in the 10th Edition and the trip generation rates have ostensibly been cut in half as compared to the 9th Edition. However, the newer Land Use Codes are based on a handful of observations which are not enough to render a degree of reliability that would warrant using the reduced trip generation counts.

In addition, the COVID-19 pandemic has drastically accelerated the use of e-commerce delivery activities and has put a premium on warehouse/distribution center square footage needed to support e-commerce. Although the Applicant has stated that it is proposing a business-to-business and not a business-to-consumer/last mile delivery facility in their application and analyses, the demand for e-commerce space after COVID-19 may ultimately drive the market and heavily influence the future tenant and use of this site. The size of the building, the 19 available loading docks, and almost 2,000 parking spaces appear to make the site suitable for an e-commerce tenant.

Since the use of the property as a warehouse is by Special Permit, it is prudent that the traffic and truck projections for the site represent "reasonable worst-case" conditions. Certainly, without an identified tenant, the description of the use as "business to business" is vague and could potentially allow for a wide variety of high volume uses for the site that comply with the applicable provisions of the City's Building Zone Regulations. Accordingly, the ultimate tenant at the site could produce significantly more cars and trucks than is presently contemplated and described by Land Use Code 150 'Warehousing' in the 10th Edition of the ITE Manual that was used as the basis for analyzing traffic conditions in the TIAS.

It has been recommended by the City's peer review firm WSP that "the Applicant perform a traffic study six months after opening of the facility to confirm engineering analysis assumptions and assess the traffic impacts on the roadway system. Any additional operational impacts beyond what is discussed in the TIAS should be mitigated and further coordinated with the City Transportation, Mobility and Parking." Unfortunately, once the Special Permit is approved by the Commission, the local residents would be severely limited in available remedies if a high passenger vehicle and truck producing e-commerce tenant ultimately occupies the space and passenger vehicle and truck traffic has already overwhelmed and excessively burdened the community. The following table illustrates how much worse passenger vehicle and truck traffic will be for the community for the "reasonable worst-case" conditions.

Trip Generation

Reasonable Worst-Case Conditions vs. Proposed Condition

Time Period	PROPOSED			REASONABLE WORST-CASE					
	Code 150 Warehousing			Code 150 Warehousing			Code 155 Fulfillment Center		
	10th Edition			9th Edition			10th Edition		
	Total	Cars	Trucks	Total	Cars	Trucks	Total	Cars	Trucks
AM Peak Hour - Generator	65	58	7	159	142	17	195	178	17
PM Peak Hour - Generator	67	57	10	128	109	19	452	413	39
Weekday	574	376	198	1,175	770	405	2,699	2,462	237
Annual	156,128	102,272	53,856	319,546	209,386	110,160	734,237	669,664	64,573

Sources: ITE Trip Generation Manual, 10th Edition, ITE *Trip Generation Manual*, 9th Edition, and *High-Cube Warehouse Vehicle Trip Generation Analysis*, Institute of Transportation Engineers, 2016

Based on the data, the warehousing scenario proposed by the Applicant in the TIAS does not account for nor recognize the potential and reasonable worst-case scenario in terms of passenger cars and trucks allowed under the current Building Code. While the applicant estimates that there will be 198 truck trips a day it could actually be between 237 and 405 – a significant increase. In addition, the present plan does not reflect current real estate market conditions that show prospective tenants seeking sites for e-commerce operations. The number of passenger cars and trucks would be far worse for the community and it would be difficult to modify the operations and/or mitigate the impacts after the Special Permit is granted by the Commission. It is imperative that the Applicant assess and disclose potential impacts for a more representative “reasonable worst-case” condition that addresses these concerns for the Commission’s consideration.

ASSIGNMENT

A review of the Applicant’s vehicle assignment, shows that there are several areas that should be addressed and reanalyzed. The Applicant identifies that the projected routes of traffic entering and exiting the site are based on existing traffic patterns within the study area, previous traffic studies for the site, and the roadway layout. The use of the 2012-2016 Census Transportation Planning Products (CTPP) Reverse Journey to Work (RJTW) data is a much more accurate method for predicting origins and destinations of future employees in a census tract based on current travel pattern behavior. In addition, the overall trip distribution patterns for passenger vehicles and trucks should be adjusted and reanalyzed to reflect that the East Avenue and Fitch Street corridors are now designated as the “primary” truck routes. Despite the Applicant’s predictions, drivers will be tempted to use residential streets as a short-cut between Strawberry Hill Avenue and East Avenue to access I-95. Without dedicating significant enforcement resources, the prohibition of through truck traffic on the local streets, including Beacon Street and Tierney Street, will be largely ineffectual and will result in a loss of peaceful enjoyment by the residents living on these streets.

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STUDY AREA

Since the “primary” truck route was shifted from Strawberry Hill Avenue to the East Avenue and Fitch Street corridors, the following intersections should be analyzed by the Applicant as a corridor to address delays and queuing during the AM and PM peak hours:

- East Avenue and the SB I-95 Ramps/Hendricks Avenue
- East Avenue and the NB I-95 Ramps
- East Avenue and St. John Street/Raymond Terrace
- East Avenue and Myrtle Street

SAFETY

Strawberry Hill Avenue is currently designated by the federal government as a "Safe Route to School" street which emphasizes walking and cycling. Since the “primary” truck route for the proposed project was shifted from Strawberry Hill Avenue to the East Avenue and Fitch Street corridors, the number of trucks in general, and most likely large articulated trucks, projected for this corridor would be reduced from what was originally proposed. However, any use of large articulated trucks by the Applicant should be avoided to the greatest extent possible on Strawberry Hill Avenue during school arrival and departure peak hours to allay safety concerns.

AUTOTURN

AutoTURN analysis has been conducted using a WB-67 tractor trailer for the following intersections (see attached figures):

1. East Avenue and Fitch Street

The analysis of existing conditions demonstrates that significant issues exist for westbound Fitch Street trucks turning right on to northbound East Avenue. Similar problems exist for southbound East Avenue trucks turning left on to eastbound Fitch Street. In order to work properly, the following changes must be implemented (the Applicant’s proposal does not include moving the stop bars):

- The northeast corner curb line (and adjacent sidewalk) must be relocated as proposed by the Applicant. This would require the acquisition of property from Saint Thomas the Apostle Church, the current owner of the site. Any geometric changes should be coordinated with the church so that curb frontage activities including passenger pick-up/drop-off and funeral and wedding vehicle staging are not adversely affected.
- The westbound Fitch Street stop bar should be moved 81 feet to the east.
- The southbound East Avenue stop bar should be moved 31 feet to the north.



2. Strawberry Hill Avenue and Fitch Street

The eastbound left turn from Fitch Street to northbound Strawberry Hill Avenue encroaches into the southern end of the bike lane. The southbound right turn from Strawberry Hill Avenue to westbound Fitch Street would operate satisfactorily.

3. Route 1 and Route 33 (Riverside Avenue)

The analysis of existing conditions demonstrate that severe issues exist for eastbound Route 1 trucks turning right on to southbound Route 33 (Riverside Avenue). Conversely, similar issues exist for northbound Route 33 (Riverside Avenue) trucks turning left on to westbound Route 1.

4. Route 1 (Van Buren Avenue and Belden Avenue) and Riverside Avenue (Norwalk)

The westbound left turn from Belden Avenue to southbound Van Buren Avenue would operate satisfactorily. The northbound right turn from Van Buren Avenue to eastbound Belden Avenue encroaches upon the westbound left turn lane. Therefore, the westbound stop bar should be moved 66 feet to the east.

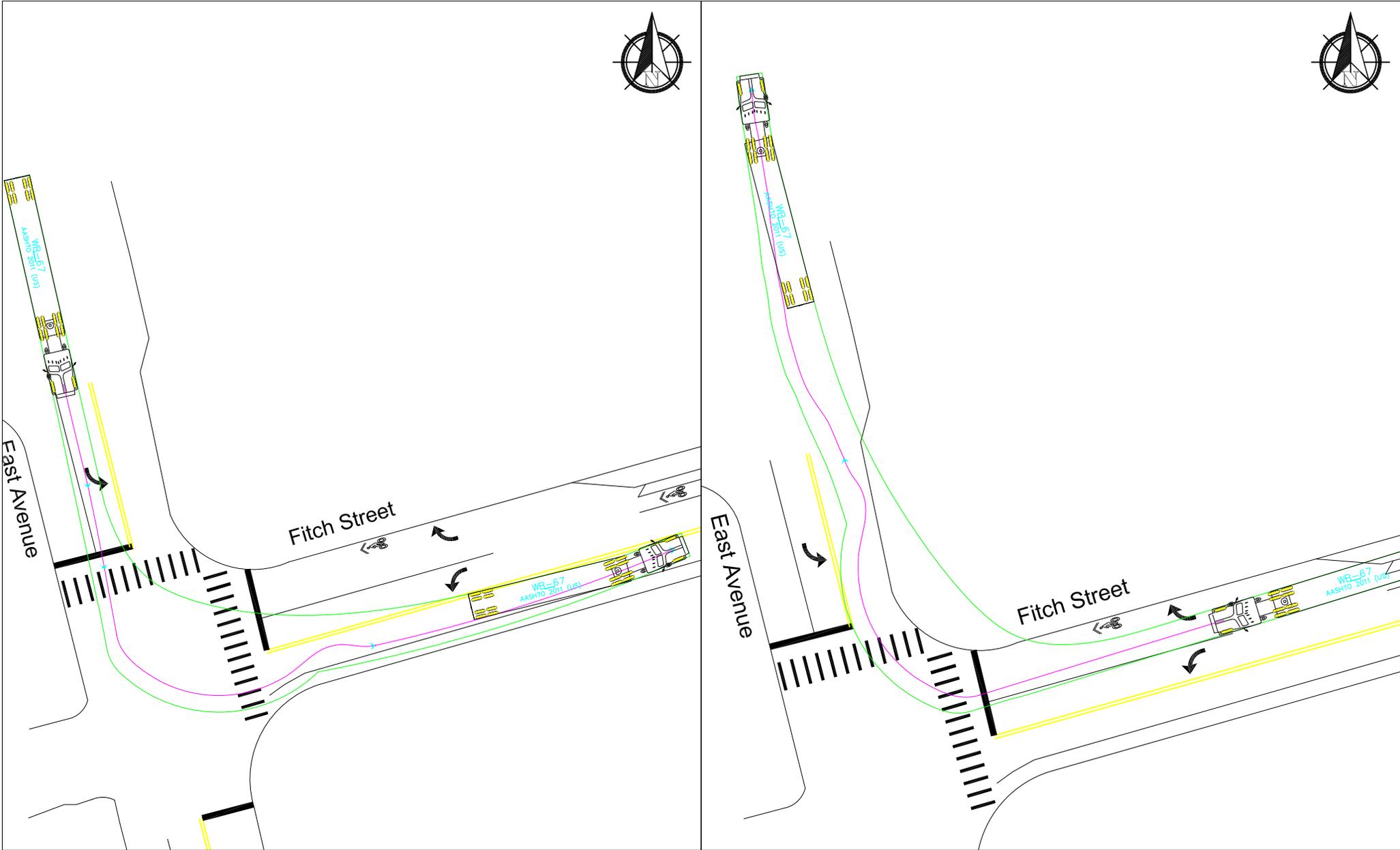
We would be happy to address any questions or concerns of the Commission at the public hearing on this matter.

Thank you for your time and consideration.

Sincerely,

Michael F. Monteleone, AICP, PP
Vice President / Project Manager
SIMCO ENGINEERING, D.P.C.

Muhammad Amir Siddiqui, P.E
State of Connecticut - Professional Engineer - License # PEN.0022631
President / CEO
SIMCO ENGINEERING, D.P.C.

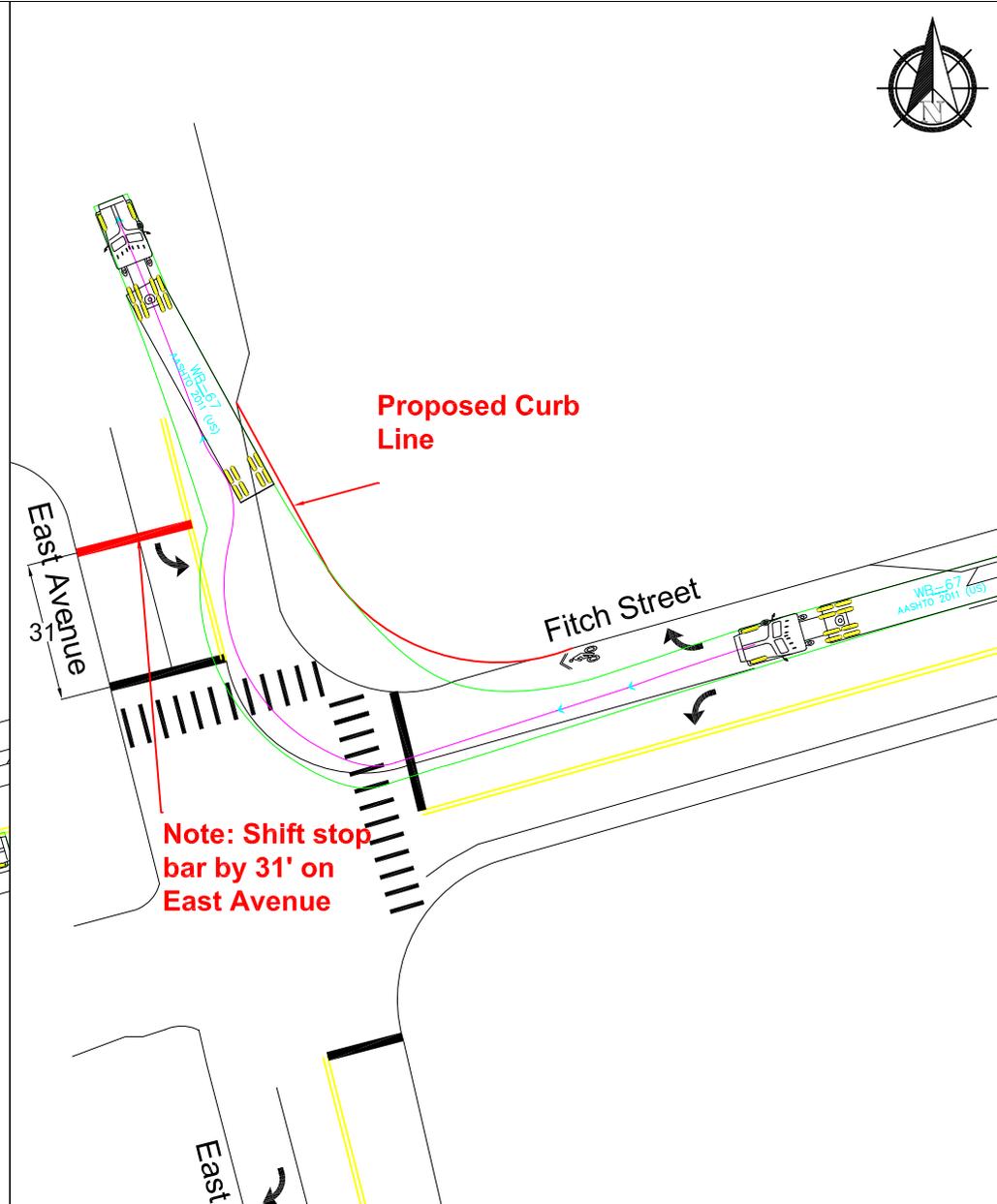
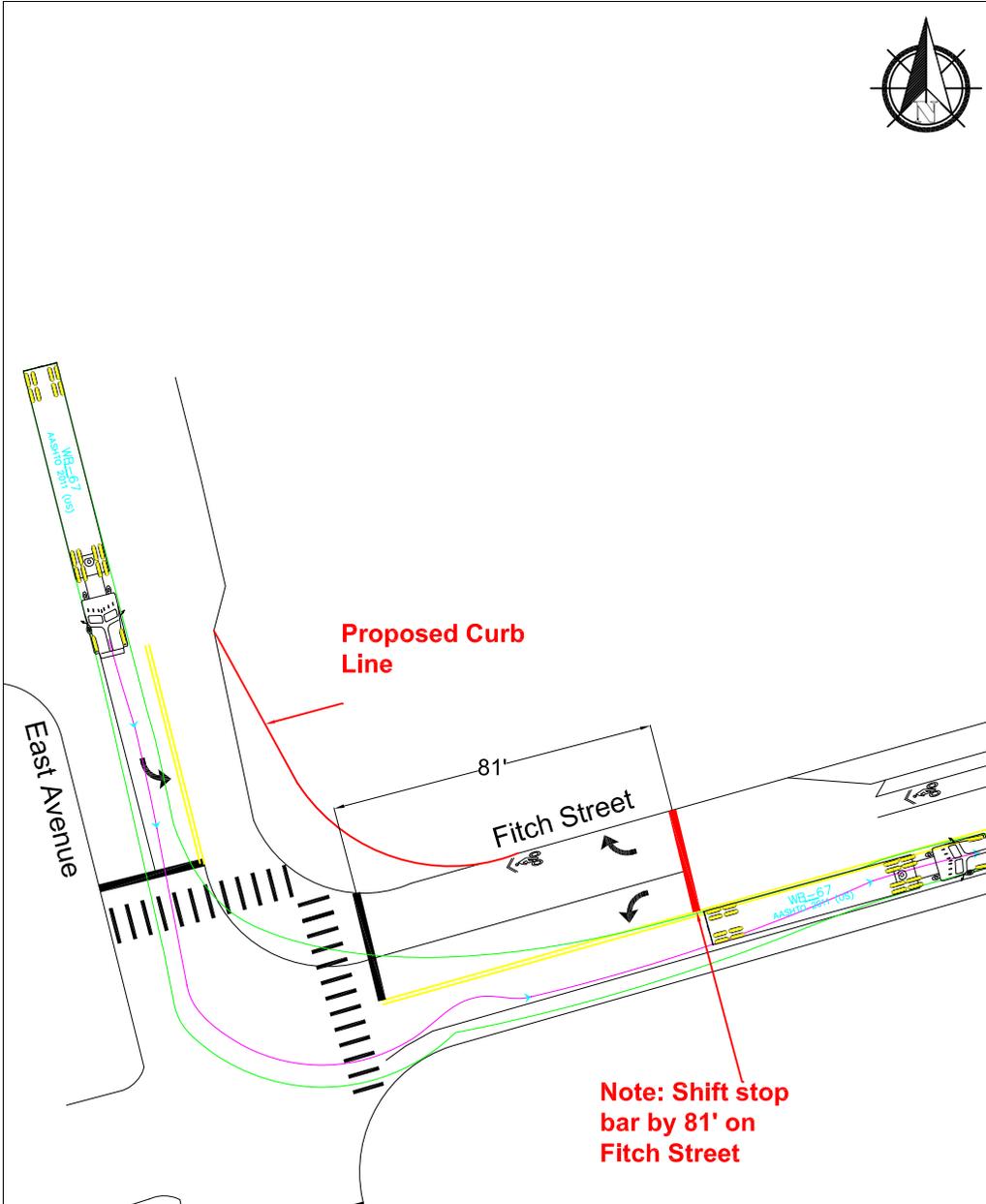


PREPARED BY:



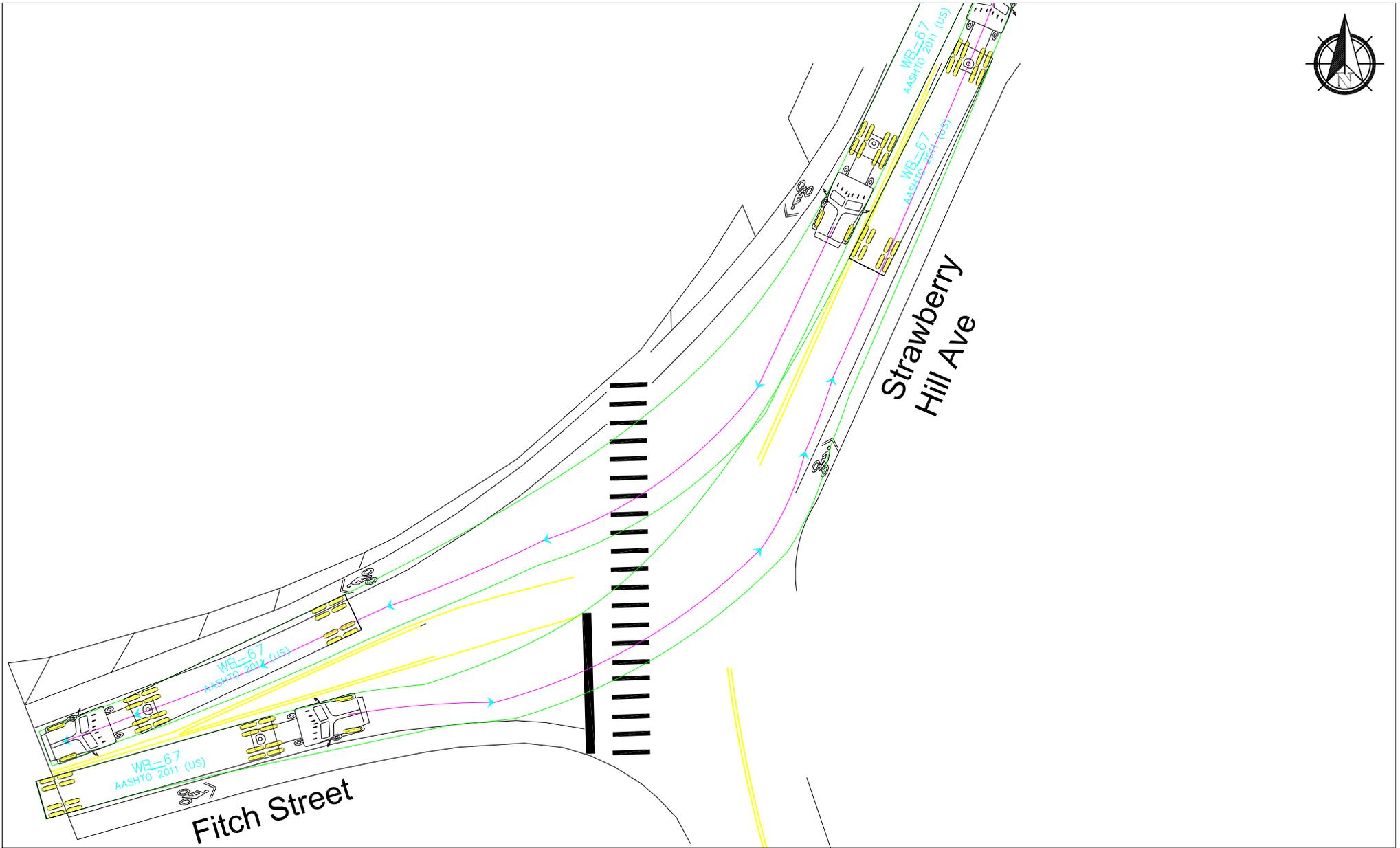
Project: 10 Norden Place, Norwalk Connecticut
Intersection: East Avenue and Fitch Street
Future Condition

Date: 01-19-2021



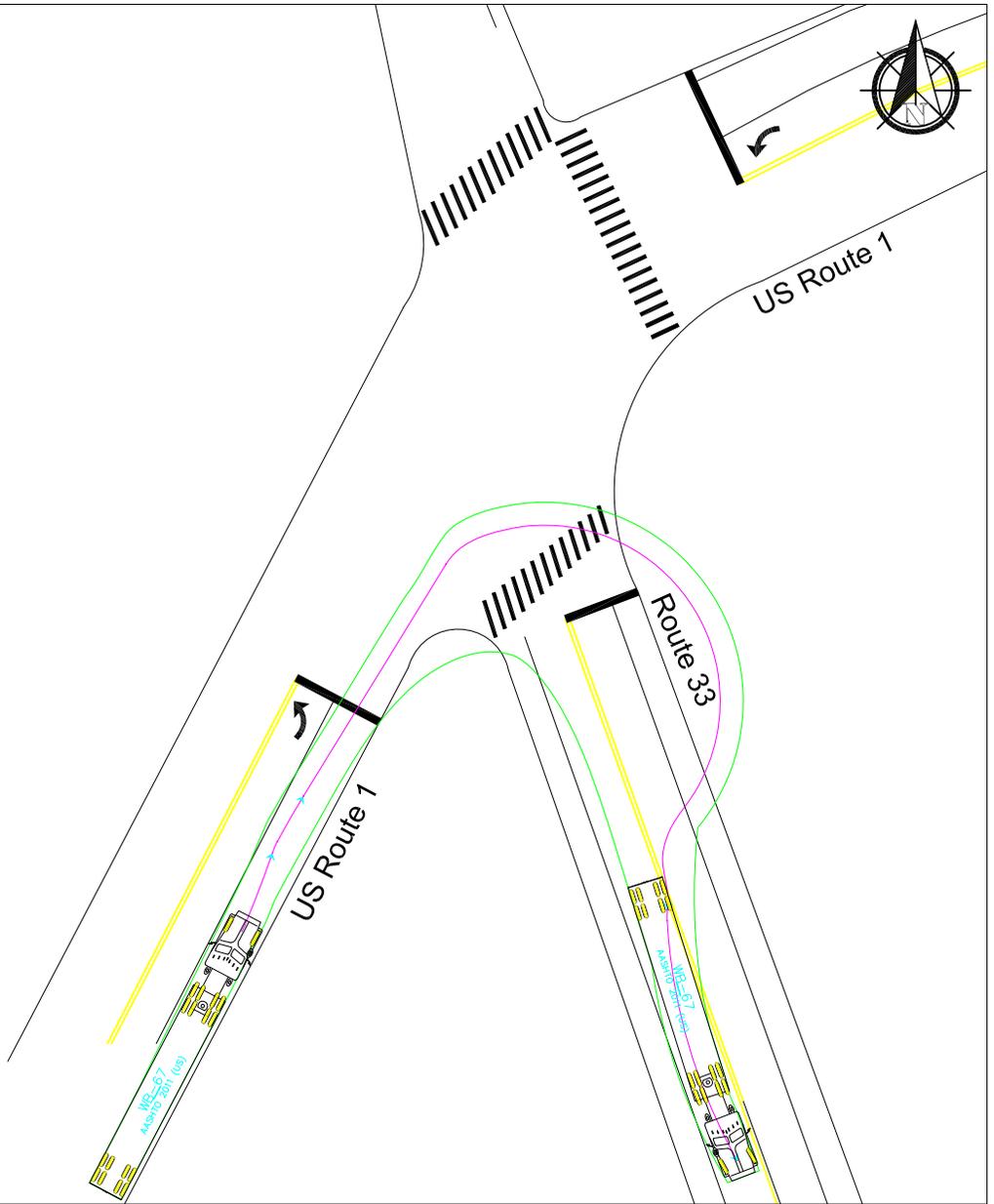
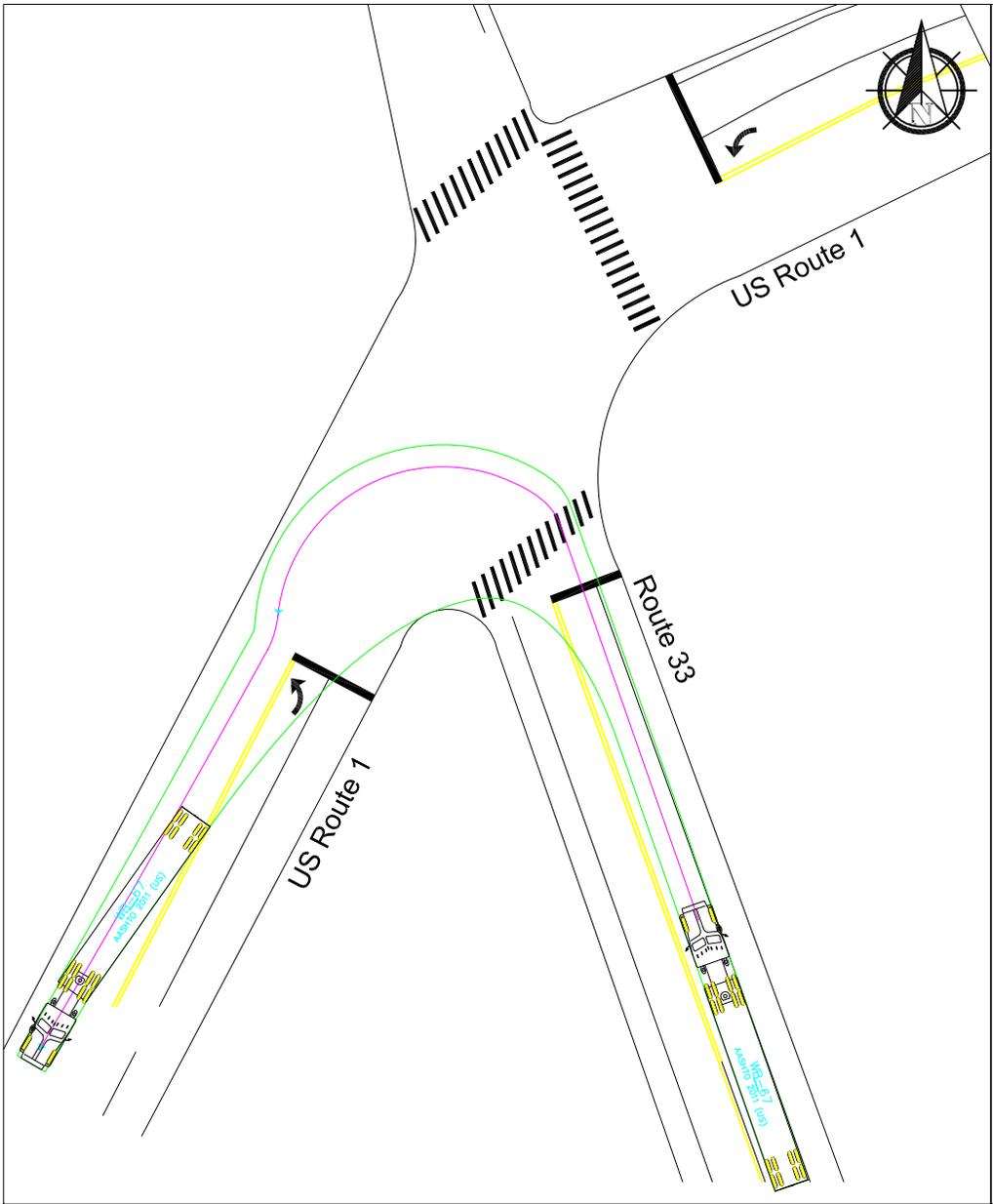
Project: 10 Norden Place, Norwalk Connecticut
Intersection: Strawberry Hill Ave and Fitch Street
Existing Condition

Date: 01-19-2021



Project: 10 Norden Place, Norwalk Connecticut
Intersection: Route 33 and US Route 1
Existing Condition

Date: 01-19-2021



Project: 10 Norden Place, Norwalk Connecticut
Intersection: Riverside Avenue and Spring Hill Avenue
Existing Condition

Date: 01-19-2021

