MEMORANDUM

То:	Lynne Ward, Vice President National Resources
From:	John Canning, P.E. Veronica Prezioso, EIT
	Kimley-Horn and Associates, Inc.
Date:	May 18, 2023
	iPark Hotel Traffic Memorandum
Subject:	761 Main Avenue (US Route 7)
	Town of Wilton/City of Norwalk, Connecticut

Kimley-Horn and Associates, Inc. has prepared this memorandum to ascertain whether the proposal to develop a 120-room hotel at the north end of the iPark property, in the Town of Wilton, will have a significant impact on area traffic operating conditions.

Executive Summary

The proposal to construct a 120-room hotel on the Wilton portion of the property was last evaluated in a Traffic Impact Study dated May 24, 2021. That traffic study, which evaluated future conditions in both 2022 and 2025, conservatively analyzed the combined potential traffic impacts of both a 132-unit, multi-family residential development on the Norwalk portion of the property, as well as the 120-room hotel that is currently contemplated to be constructed on the Wilton portion of the property (the residential building was approved by the City of Norwalk later in 2021). The Traffic Impact Study concluded, on page 5, that "the proposed apartments and contemplated hotel will not have a significant adverse impact on 2022 or 2025 traffic operations in the study area"¹.

The Applicant is now seeking approval to construct the hotel which, as indicated in Table 2 of the Traffic Impact Study (replicated for convenience below), is projected to generate 47 trips in the AM peak hour and just 38 trips during the PM peak hour. As indicated on Figure 14 of the Traffic Impact Study (also replicated below for convenience), these 47 and 38 trips will disperse to the site's two driveways with the result that no more than 30 vehicles are expected to be added to any intersection in the vicinity of the site during the busiest hour (1 vehicle every 2 minutes).

This memorandum conducted a detailed evaluation of changes in traffic conditions at and surrounding the iPark development. For the reasons enumerated below, it is concluded that future operating conditions at the site and on the surrounding roadway network are expected to be better than previously projected and the findings concluded in the May 2021 Traffic Impact Study remain valid:

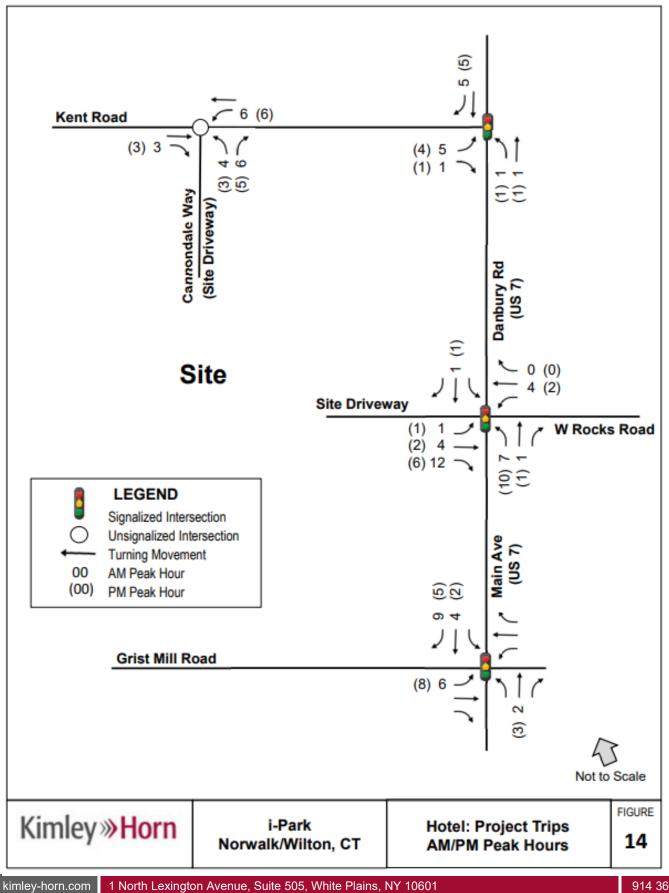
- The latest Institute of Transportation Engineers (ITE) data indicates that hotel and apartment traffic activity will be slightly less than previously evaluated;
- Existing, non-iPark traffic volumes passing the site have declined considerably since the pandemic;
- Future iPark traffic activity will be less than previously projected;
- Combined future traffic volumes evaluated in the Traffic Impact Study were considerably higher than are now forecast;

¹ The Traffic Impact Study analyses indicated that the combined apartment building and hotel traffic would not require mitigation measures under the State's TIAS guidelines. Nevertheless, the Traffic Impact Study recommended changing traffic signal timings to better accommodate future traffic volumes.

If the iPark expansion did not have an impact with the higher projected volumes, it will not have an impact with current lower traffic volumes.

Table 2 – Trip Generation											
Ducie of Commenced	A	M Peak Ho	our	P	PM Peak Hour						
Project Component	Enter	Enter Exit Total			Enter Exit						
Residential - 132 units											
Vehicular Trips	13	35	48	35	23	58					
Hotel - 120 rooms	Hotel - 120 rooms										
Vehicular Trips	20	27	47	21	17	38					
Total Project Trips	33	62	95	56	40	96					

Source: Based on ITE Trip Generation Manual, 10th Edition.



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Projected Development Traffic Volumes

Since the completion of the 2021 Traffic Impact Study, the Institute of Transportation Engineers (ITE) has updated their publication, *Trip Generation Manual*, which is used to project how much traffic different types and sizes of development will generate. A comparison of the data contained in the latest version, 11th Edition, of the *Trip Generation Manual* to that contained in the previous version, 10th Edition, upon which the Traffic Impact Study was based, indicates that, combined, the approved apartment building and proposed hotel will generate up to 8 fewer trips than previously projected. Thus, **the 2021 Traffic Impact Study**, which concluded that the hotel and apartments would not have a significant adverse traffic impact, **evaluated Project traffic volumes that were up to 8% greater than are now expected to be generated.**

iPark Traffic Volumes

As indicated in Table 2A below, traffic counts conducted in March 2011 (from the March 31, 2011 Tighe & Bond Traffic Statement, replicated below for convenience) indicated that the iPark development generated 443 trips during the peak hour on a weekday morning and 758 trips during the peak hour on a weekday evening. As can be seen from Figure 2 of the 2021 Traffic Impact Study (also replicated below for convenience), iPark traffic volumes (conducted in September of 2019) were 9% higher than in 2011 in the AM peak hour and 28% lower than in 2011 in the PM peak hour.

To assess current (2023) traffic conditions in the study area, updated peak-hour turning movement counts were conducted on Tuesday, May 9, 2023, at the following intersections from 7:30 to 9:30 AM and from 4:30 to 6:30 PM:

- 1. Kent Road & iPark Driveway/Cannondale Way
- 2. US Route 7 (Main Avenue/Danbury Road) & Kent Road
- 3. US Route 7 (Main Avenue/Danbury Road) & iPark Driveway/West Rocks Road
- 4. US Route 7 & Grist Mill Road

The Project driveway counts indicated that the weekday morning peak-hour of traffic activity at the site occurred from 7:45 to 8:45 AM and the weekday evening peak-hour occurred from 5:00 to 6:00 PM. The current iPark driveway volumes, shown in Table 2A below are 21% higher than the 2011 volumes and 11% higher than the 2019 volumes. However, **during the busier PM peak hour** (when both iPark and traffic volumes passing on the adjacent streets are greater), **iPark currently generates only 4% more traffic than in 2019 and a full 24% less traffic than in 2011**.

Table 2A – Trip Generation										
	AN	AM Peak Hour PM Peak Hour								
	Enter	Exit	Total	Enter	Exit	Total				
2011 Trips	342	101	443	325	433	758				
2019 Trips	355	126	481	189	360	549				
2023 Trips	375	159	534	235	338	573				

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18-0030-2-10 March 31, 2011

Ms. Lynne Ward Vice President i.Park Norwalk, LLC 485 West Putnam Avenue Greenwich, CT 06830

Re: LA Fitness Expansion at i.Park Traffic Statement Norwalk, Connecticut

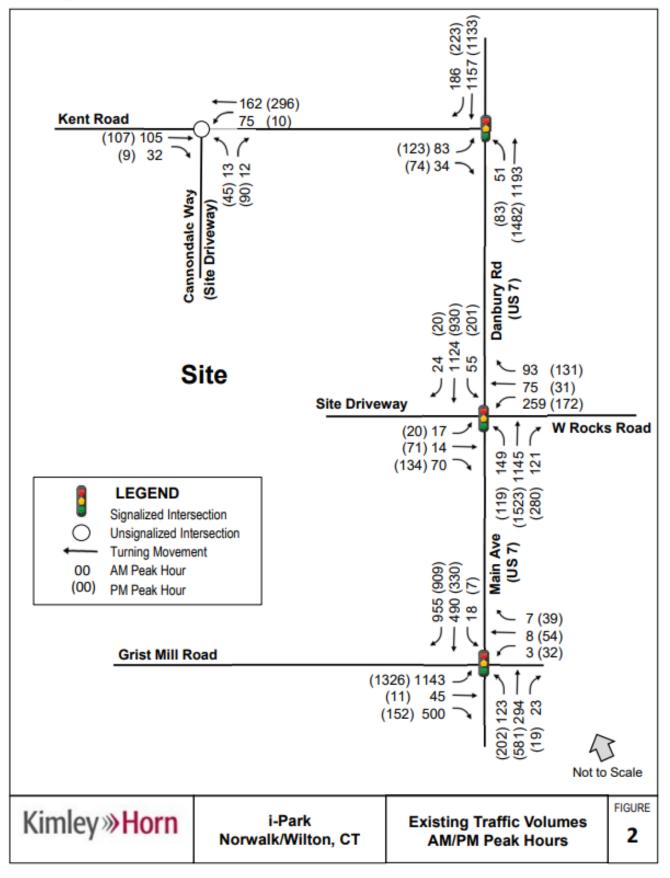
Dear Ms. Ward:

EXISTING i.PARK TRIP GENERATION

During the recent data collection process, in addition to the US Route 7 and West Rock Road / i.Park Site Driveway intersection, manual turning movement counts were also conducted at the Kent Road and i.Park Site Driveway intersection. The combined data between the two intersections provides an insight on the existing site traffic generation associated with the current i.Park development during both morning and afternoon peak hours.

During the morning peak hour, i.Park generates 443 vehicular trips, including 342 inbound trips, and 101 outbound trips. The morning peak hour trip generation is 24% less than the previous estimation during the STC approval process.

During the afternoon peak hour, i.Park generates 758 vehicular trips, including 325 inbound trips, and 433 outbound trips. The afternoon peak hour trip generation is 33% higher than the previous estimation during the STC approval process.



Network Traffic Volumes

As indicated in Table 3 below, traffic counts conducted in March 2011 indicated that 2,955 vehicles passed the iPark driveways during the peak-hour on a weekday morning and 3,284 did so on a weekday evening. As can be seen from Figure 2 of the 2021 Traffic Impact Study (above), in September of 2019, passing traffic volumes were 4% higher than in 2011 during the morning peak hour and 11% higher than in 2011 during the PM peak hour. However, post-pandemic, traffic volumes passing the site driveway have decreased by 9%, as compared to the 2011 volumes, and 12% as compared to the 2019 volumes in the morning peak hour, and by 7%, as compared to the 2011 volumes, and 17% as compared to the 2019 volumes in the evening peak hour. Thus, since the iPark traffic constitutes just 16% of the total traffic passing the intersections of the site's driveways with Kent Road and US Route 7, overall traffic activity in the vicinity of the project has declined post-pandemic/since the completion of the 2021 Traffic Impact Study.

Table 3 – Non-iPark Traffic									
Passing iPark Driveways	AM Peak Hour	PM Peak Hour							
2011	2,955	3,284							
2019	3,064	3,640							
2023	2,697	3,038							

Combined Traffic Volumes

To evaluate the combined iPark and non-iPark traffic volumes, the 2023 peak-hour volumes were compared to 2019² Existing and 2022 Build traffic volumes, conditions analyzed in the May 2021 Traffic Impact Study. The volumes for each of these conditions are summarized in **Table 4** below³. Table 4 indicates that the evening peak hour is the critical time frame, as there is 9% more traffic passing through the study intersections during this peak hour than during the morning peak hour (a fact reflected in Tables 4 through 8 of the 2021 Traffic Impact Study). For "Future Traffic" in Table 4 below, the current non-Project Traffic was increased by 5% and the trips projected to be generated by the apartments and hotel were added to the current iPark traffic.

	Table 4 – Comparison of Study Area Peak-Hour Traffic Volumes (2022 Build)											
	2019 Existing		xisting 2023 Actual			2022 Build			Future Traffic			
	iPark Traffic	Non- Project Traffic	Overall Traffic	iPark Traffic	Non- Project Traffic	Overall Traffic	iPark Traffic	Non- Project Traffic	Overall Traffic	iPark Traffic	Non- Project Traffic ¹	Overall Traffic
AM	828	9,030	9,858	929	7,859	8,788	1,012	9,639	10,651	1,096	8,252	9,348
PM	942	10,027	10,969	983	8,569	9,552	1,140	10,728	11,868	1,156	8,997	10,153
				% Difference								
AM			12%	-13%	-11%	22%	7%	8%	8%	-14%	-12%	
PM			4%	-15%	-13%	21%	7%	8%	1%	-16%	-14%	

¹ 2023 non-project traffic increased by 5%

² Turning movement counts conducted in September 2019.

³ The 2011 traffic study did not include the intersections of US Route 7 with Grist Mill Road or Kent Road (which were studied in the 2021 Traffic Impact Study), so no comparison to 2011 conditions is provided in Tables 4 or 5.

As can be seen from Table 4 above, the 2023 iPark traffic at the site driveways is higher than it was in 2019 but the background traffic on the surrounding roadway network is substantially lower. The Traffic Impact Study's 2022 Build analysis projected that both iPark and non-project traffic would be considerably greater than in 2019 and that, combined, they would be 8% greater during both peak hours. In reality, even if the non-Project traffic increases by 5%, the combined traffic volumes will be between 12% and 14% lower than analyzed in the 2021 Traffic Impact Study and, during the critical evening peak hour, the iPark driveway volumes will only be 1% higher than evaluated in the 2021 Traffic Impact Study. Thus, it is clear that the Traffic Impacts Study's evaluation of the 2022 Build conditions was conservative.

Additionally, the 2023 peak-hour volumes were compared to 2019 Existing and 2025⁴ Build traffic volumes, conditions analyzed in the May 2021 Traffic Impact Study. The volumes for each of these conditions are summarized in **Table 5** below. For "Future Traffic" in Table 5, the current non-Project Traffic was increased by 10% and the trips projected to be generated by the apartments and hotel were, again, added to the current iPark traffic.

	Table 5 – Comparison of Study Area Peak-Hour Traffic Volumes (2025 Build)												
	2019 Existing		2023 Actual			2025 Build			Future Traffic				
	iPark Traffic	Non- Project Traffic	Overall Traffic	iPark Traffic	Non- Project Traffic	Overall Traffic	iPark Traffic	Non- Project Traffic	Overall Traffic	iPark Traffic	Non- Project Traffic ¹	Overall Traffic	
AM	828	9,030	9,858	929	7,859	8,788	1,275	10,984	12,259	1,096	8,645	9,741	
PM	942	10,027	10,969	983	8,569	9,552	1,331	11,298	12,629	1,156	9,426	10,582	
	% Difference												
AM	AM			12%	-13%	-11%	54%	22%	24%	-14%	-21%	-21%	
PM			4%	-15%	-13%	41%	13%	15%	-13%	-17%	-16%		

¹ 2023 non-project traffic increased by 10%

As can be seen from Table 5 above, the Traffic Impact Study's 2025 Build analysis very conservatively projected that both iPark and non-project traffic would be considerably greater than in 2019 and that, combined, they would be 15% to 24% greater during the peak hours. In reality, even if the non-Project traffic increases by 10%, the combined traffic volumes will be between 16% and 21% lower than analyzed in the 2021 Traffic Impact Study while iPark driveway volumes will be 13% to 14% lower than evaluated in the 2021 Traffic Impact Study. Thus, it is clear that the Traffic Impacts Study's evaluation of the 2025 Build conditions was even more conservative than the 2022 Build analysis.

Conclusions

For the reasons below, it is concluded that future operating conditions at the site and on the surrounding roadway network are expected to be better than previously projected and the findings concluded in the May 2021 Traffic Impact Study remain valid:

- Based on the latest Institute of Transportation Engineers (ITE) data, traffic activity at the hotel and apartments will be slightly less than previously evaluated;
- Existing, non-iPark traffic volumes passing the site have declined considerably since the pandemic;
- Future iPark traffic activity will be less than previously projected;

⁴ 2025 Build year was analyzed based on direction by the City of Norwalk and the Connecticut Department of Transportation.

• Combined future traffic volumes evaluated in the Traffic Impact Study were considerably higher than are now forecast;

If the iPark expansion did not have an impact with the higher 2022 and 2025 Build analyses, it will not have an impact with current lower traffic volumes.

Please contact me at (914) 368-9188 or at john.canning@kimley-horn.com should you have any questions.

Sincerely,

John Canny

John Canning, P.E. Associate CT PE Number: 0028017