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May 3, 2023

Mr. Michael Wrinn, Town Planner
Planning & Zoning Department
Town of Wilton
Town Hall Annex
238 Danbury Road
Wilton CT 06897

**RE: Peer Review of Traffic Operations
Proposed Multifamily Residential Housing
12 Godfrey Place, Wilton**

Dear Mr. Wrinn:

In accordance with our Contract with the Town of Wilton, we have completed a Peer Review assessment of the materials provided by the applicant for the above referenced development. This letter report will document our findings. This review focuses on the methodologies employed by the applicant in preparing the access and traffic plan to provide for the safe use of the site by tenants and others using the roads in the vicinity of the site.

INTRODUCTION

The proposed development consists of a single building of 5 stories. The upper 4 floors consist of a total of 42 residential units, including 13 single-bedroom units, 19 two-bedroom units, and 10 three-bedroom units. Fourteen of these units also include a den. Units range from 829 SF (6 units) to 2330 SF (4 units). Twenty-one (50%) of the units are over 1450 SF. The ground level of the structure is occupied by a parking garage, the lobby, a residents' gym, and residents' storage areas.

The proposed residential/retail use will replace an existing three story (approximately 10,900 SF) office building.

PEER REVIEW

We have reviewed the plans, traffic report, and other pertinent traffic related materials provided by the applicant, as posted on the Town's website. These include the following documents:

1. Traffic Evaluation letter dated February 28, 2023 addressed to Mr. Jay Ross of Greenwich Realty Development, LLC prepared by Greg Del Rio, PE of Hardesty and Hanover, 20 North Main Street, Suite 218, Norwalk Connecticut 06854
2. Site Development Plan Application, transmitted by letter dated March 8, 2023 from Elizabeth A.B. Suchy of Carmody, Torrance, Sandak and Hennessey, LLP, 1055 Washington Boulevard, Stamford Connecticut 06901
3. Architectural Plans prepared by Granoff Architects, 330 Railroad Avenue, Greenwich Connecticut 06830, Dated and Revised through February 7, 2023.
4. Revised Plans A 100 and AS 100 prepared by Granoff Architects, 330 Railroad Avenue, Greenwich Connecticut 06830, Dated and Revised through February 7, 2023.

Pursuant to your requested scope of review items, we offer the following:

1. ***Trip generation, traffic volumes, vehicle turning movements:***

The applicant used the publication *Trip Generation* (11th Edition) published by the Institute of Transportation Engineers (ITE) to compute the vehicle trips that can be anticipated from the redevelopment of the site. Since the site is presently occupied by an office building, the traffic generation for the existing condition was compared to the proposed condition to determine the change in traffic that can be expected from the proposed site redevelopment. This is the proper way to address the redevelopment of the site. These calculations were focused on the morning and afternoon weekday peak hours, which is appropriate for the existing office building and the proposed residential building.

The Trip Generation database provides a summary of actual counts of many different land uses, and compiles the data by type of land use. The data presents average generation and a fitted curve (linear regression) analysis. The applicant used the General Office Building (Land Use Code 710) to determine the generation of the existing building. In reviewing this calculation, we chose to also compute the anticipated traffic using Land Use Code 712 for “Small Office Building” which is defined as a building under 10,000 Square feet. Computations were done using both the fitted curve and average trip rate for comparison purposes. The results are provided in Table 1, and show that for a building of this size, there is very little variation in the result when comparing the various methodologies. Furthermore, this calculation verifies the calculations provided by the applicant, and we concur with their findings for the existing building.

Table 1

Existing Trip Generation

ITE Trip Generation 11th edition

10,900 SF Office		Daily Traffic	AM Peak Hour			PM Peak Hour		
			Enter	Exit	Total	Enter	Exit	Total
ITE LUC 710 General Office	Rate	118	15	2	17	3	13	16
	Curve	169	22	3	25	4	22	26
ITE LUC 712 Small Office	Rate	157	15	3	18	8	16	24
	Curve	-	-	-	-	-	-	-

RED numbers chosen for the existing use.

For the proposed residential building, the applicant chose Land Use Code 221 – Mid-rise multi-family residential building. This is the appropriate Land Use Code for this facility. (Note that the applicant’s Table 1 states “Low Rise”, which would be incorrect for this facility. However, the computation actually uses the correct mid-rise Land Use.)

Trip Generation has a sub-set of the data base to be used for residential facilities within a ½ mile walk to a train station. Measurements of this site show that it is 1600 feet (walking) to the Wilton train station. We completed the computations using both data sub-sets to test their sensitivity.

For a project of this size, both data subsets provided similar results, as shown in Table 2. We find that these projections do not differ significantly from the applicant's submittal, and we concur with their calculations.

The proposed project also includes a fitness center, which is solely for the use of residents, and should have no traffic impact on its own.

Table 2

Proposed Trip Generation
ITE *Trip Generation* 11th edition

42 Residential Units 661 SF Retail	Daily Traffic	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
ITE LUC 221 Mid-Rise Residential NOT CLOSE to Train	Rate Curve 191 154	4 2	12 5	16 7	10 10	6 7	16 17
ITE LUC 221 Mid-Rise Residential CLOSE to Train	Rate Curve 200 -	5 5	8 9	13 14	8 8	4 4	12 12

RED numbers chosen for the proposed use.

Table 3 shows a summary of the existing and proposed traffic generation.

Table 3

Net Trip Generation Due to Redevelopment
ITE *Trip Generation* 11th edition

	Daily Traffic	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
Proposed	191	4	12	16	10	6	16
Existing	157	15	3	18	8	16	24
Net Change	34	-11	9	-2	2	-10	-8

Note: Negative numbers represent a reduction in generated traffic.

In summary, although we see slight variations in the methodology of the trip generation, we concur with the applicant's statement that there is essentially a

minor reduction in the overall generation as a result of the redevelopment of the site. All generated volumes are within a few cars above or below of existing conditions. Turning movement variations will be inconsequential.

2. *Reported Traffic Accidents*

No crash data was provided with the applicant's documents. It is unlikely, given the negligible change in traffic generated from the redevelopment of the site, that the development would have any impact on crash rates in the surrounding area.

3. *Sight Distances*

We concur with the applicant's statement that the sight distances should be adequate at the location of the proposed driveway. Hubbard Road is straight and level, and looking right should be unobstructed. It appears from the landscaping plan that no plantings will encroach on the sight line. Looking left, traffic is coming around a short radius corner and should be moving slowly.

4. *Intersection delays, Intersection geometry, Congestion*

No computations were provided on traffic operations, delays or congestion. From the information provided, it appears that it is the applicant's position that the changes in traffic do not warrant a rigorous analysis. While we see the reasoning for this position, it must be noted that it relies on the anecdotal assumption that there are no traffic issues in the area at the present time. This has not been demonstrated.

5. *Safety hazards, Vehicle circulation, Site circulation, Points of ingress and egress, Turning radii and Intersection design for accommodating expected passenger vehicles, Truck deliveries*

Vehicle and Site Circulation are only within the ground floor garage. All parking spaces are 9 feet by 18 feet, and the aisle is 24 feet wide. These are proper dimensions for the parking area. The entrance radius, while small, appears adequate for the small garage. The single drive is located at a reasonable location on Hubbard Road. Truck access is not described in the applicant's documents. There is no explanation of how the refuse room will be accessed, or how mail or parcel delivery will be handled. Access to the corner spaces (Space

1, 19 and 20) may require multiple maneuvers due to the staircase walls at the ends of the aisle.

6. *Emergency Responder Vehicles*

In this regard, we have spoken with Fire Marshall Rocco Grosso who has indicated that they have reviewed the application and believe that it meets applicable fire codes. He noted that they have aerial equipment up to 105 feet, which should be sufficient for this structure. Hubbard Road will be the designated approach to the site. He also confirmed that emergency responders would not bring vehicles into the garage. They would access the building from without. Our review of the appropriate codes concurs with this evaluation.

7. *Design and appropriateness of planned pedestrian improvements and pedestrian circulation*

Sidewalks are indicated across the entire site frontage on both Godfrey Street and Hubbard Road. These walkways will connect to the existing sidewalks to the north and east, making a continuous walking path in the neighborhood. Because parking for the development is located across Hubbard Road, it would be appropriate to add a crosswalk and a defined walking path for those who park on that side of the street. Presently, there is a fairly steep slope through an unpaved (dirt) area to reach these 8 spaces and the only paved access is the driveway. The crosswalk should match the other crosswalks in the area as to dimensions and materials, signage and ADA accessible ramps.

8. *Appropriateness and impact of the number and location of the proposed parking spaces*

There are several methods for calculating the number of parking spaces required to support a development. These are as follows:

- a. Most commonly, Zoning regulations provide the required number of parking spaces to be provided. In this case, the Town of Wilton has clear requirements for parking for a multi-family residential development. The regulations require 1 parking space for each single bedroom unit, and 2 spaces for every 2 or 3 bedroom unit. This computes as follows:

13 single bedroom units X 1 = 13

29 2/3 bedroom units X 2 = 58

Total Required = 71 Spaces

Because this is an CGS 8-30g application, the applicant is exempted from meeting this regulation. However, it is an indication of the parking required to support this use.

- b. A second method for calculating parking can be found using the Institute of Transportation Engineers (ITE) Database on *Parking Generation*.

This database provides actual parking counts observed at facilities throughout the country and can be used to predict the parking required at a new facility such as this. It is important to note that since the database includes actual observations of parking, these observations only demonstrate a specific moment in time (when the observation was made). It is good engineering practice to provide additional parking as a margin of safety or have an “overflow” plan if the database is used.

There are several ways to use this database to predict the parking needed at a facility. There are calculations for low-rise and mid-rise facilities. There are also calculations based on the number of occupied units, and the number of bedrooms. Calculations were completed based on all these parameters for comparison purposes, and the results are provided in Table 4, below for 42 units and for 81 bedrooms.

This table shows a predicted parking need of between 46 and 61 parking spaces. Based on the number of large units and the overall size of the units proposed, it would appear that at least 55 spaces are necessary, and possibly as many as 61, or even 75 (to meet the Town’s regulations). Because there is no on-street parking available, sufficient parking must be provided on-site, as there is nowhere to accommodate overflow parking.

Table 4

Parking Required
ITE Parking Generation 5th edition

		Rate	Curve
ITE LUC 220 Low Rise	Units (42)	51	36
	Bedrooms (81)	53	54
ITE LUC 221 Mid-Rise	Units (42)	55	51
	Bedrooms (81)	61	46

We note that the use of 8 spaces is shown on the west side of Hubbard Road, but only 7 spaces are indicated on the plan. Will the 8 spaces be assigned to residents, and will they be marked/signed to enforce their use?

CONCLUSIONS

In general, the applicant has demonstrated that the redevelopment of the subject site will not substantially add traffic to the surrounding roadway network. Pedestrian accommodations are good, although a crosswalk should be provided to access the parking spaces on the opposite side of Hubbard Road, and pedestrian accommodations should be included for access to those spaces.

The applicant makes the assumption that because the project will not add traffic, there is no impact on the existing traffic conditions in the area. While that is generally true, there is no evidence presented regarding existing traffic volumes, congestion or safe operation on the surrounding roadways at the present time. While we concur that there is no readily apparent concern, it would be better if there was some documentation rather than relying on an assumption.

The most significant issue for this site is the provision of only one parking space per dwelling unit. The development plan indicates very attractive, large, multi-bedroom units, and using either the Town's regulations or calculations from the ITE database, it

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can be anticipated that there will be parking needs that cannot be accommodated on the site, and that cannot be accommodated on the surrounding roadways. A parking plan must be presented that explains how the potential overflow of parking by as much as 50% will be reasonably handled.

Thank you for the opportunity to provide this review to the Town of Wilton. We will be prepared to present these findings and respond to comments or questions at Monday's hearing.

Very truly yours,

MITCHELL TRAFFIC ENGINEERING LLC

A handwritten signature in blue ink that reads "Stephen Mitchell". The signature is written in a cursive, flowing style.

Stephen F. Mitchell, PE