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April 22, 2021

Thomas Talbot, Town Planner Planning & Zoning Department Town of Wallingford 45 South Main Street Wallingford, CT 06492

Re: Traffic Peer Review Comments Proposed Delivery Station Building 5 Research Parkway

Dear Mr. Talbot:

We are in receipt of VN Engineers' comments dated April 1, 2021, regarding the project noted above. Our responses are indicated below in *bold italic* text and are as follows:

Study Area

1. The study area that is presented in the traffic study report includes the key signalized and unsignalized intersections that most of the trips to and from the proposed Delivery Station would be expected to pass through. The study area selected is appropriate for analyzing the impacts of the proposed development.

Response: Noted, no action necessary.

Existing Traffic Counts

2. The study identifies that the existing weekday morning and weekday afternoon peak-hour counts were collected in October 2018, prior to the COVID 19 pandemic. The weekday midday peak-hour counts were collected in October 2020, during the COVID 19 pandemic, and were reviewed and adjusted by the CTDOT Bureau of Policy and Planning. The weekday morning and afternoon peak-hour volumes presented in Figure 2 are in line with the hourly count data available on the CTDOT Traffic Monitoring Station Viewer at count stations WALL-237 and WALL-030. The weekday midday peak-hour volumes presented in Figure 2 are approximately 150 vehicles per hour lower than those provided for count stations WALL-237 and WALL-030. The weekday midday peak-hour volumes should be verified and the analyses should be adjusted to reflect the volumes provided on the CTDOT Traffic Monitoring Station Viewer.



Response: Noted, traffic volumes for existing conditions were all verified by CTDOT. The mid-day counts were verified again and CTDOT approved the increase of 150 vehicles in both directions. The change was incorporated in the revised report to be submitted prior to the next planning and zoning meeting.

3. The Existing (2020) Traffic Volumes Figure 2 includes a sheet note that states the AM/PM volumes were adjusted by CTDOT for 2020. This note differs from the statement made on page 9 of the report that states the Existing 2020 midday traffic volumes were adjusted by the CTDOT Bureau of Policy and Planning. The process for collecting and adjusting the peak-hour volumes to Pre-Covid conditions should be further clarified.

Response: Noted, Figure 2 has been updated to reflect better description of adjustments. Please, note the weekday AM and PM peak hours were 2018 CTDOT approved volumes while midday counts were performed during Covid-19 pandemic. Both counts were reviewed and adjusted by CTDOT on two separate occasions.

4. The peak-hour volumes for the intersections of Research Parkway with Joseph Carini Road and the Marlin Software driveway should be added to the traffic figures.

Response: Additional traffic count data has been collected to assess the impacts of the proposed development on Joseph Carini Road and the Marlin Software driveway intersections.

5. The traffic figures show the signalized site driveway as Site Drive #2, whereas the rest of the report references this driveway as Site Drive #1. The traffic figures should be revised to be consistent with the report and analyses.

Response: Noted, edits have been made to traffic figures.

6. The existing traffic volumes at some intersections do not balance with those at the adjacent intersection, where there are no driveways in between these intersections. While these balancing differences are not expected to have a significant impact on the analyses, they should be corrected in all the revised figures and capacity analyses.

Response: Noted, all volumes have been reviewed and adjusted by CTDOT. For revised figures and analysis, the imbalances were removed in the revised analysis.

7. The traffic study mentions that pedestrian counts were recorded at the study intersections. While it is anticipated that pedestrian activity is low in the study area, a statement should be made regarding the pedestrian activity at the study intersections.

Response: Noted, in the existing conditions section a paragraph is included on pedestrians presence in the study area.



Crash History

8. The crash analysis study period includes the three-year period between January 1, 2017 and December 31, 2019. The selected period does not include time during the COVID-19 pandemic and is appropriate for use in this study.

Response: Noted, no action necessary.

9. The crash analysis does not include analysis in the vicinity of either of the site driveways or the Marlin software driveway. Crash analysis should be provided at the same locations where the capacity analysis was performed.

Response: Noted, additional queries of crash data were made to include smaller segments and intersection along Research Parkway.

10. The crash analysis identified that the most crashes within the study area occurred at the unsignalized four-way stop controlled intersection of Research Parkway and Carpenter Lane. Four of these crashes were angle collisions and three crashes were rear-end collisions. These crash patterns suggest that there may be sightline or geometric issues where drivers are not aware of the stop-control. Based on a recent site visit, STOP AHEAD signs were observed at both the northbound and southbound Research Parkway approaches. Are there sightline or geometric conditions that may be contributing to these crashes that could be addressed through the installation of additional warning signage?

Response: A field visit of the four-way stop controlled intersection of Research Parkway and Carpenter Lane found overgrown vegetation blocking sightlines on the Carpenter Lane eastbound approach looking both northbound and southbound along Research Parkway. Looking west from Research Parkway onto Carpenter Lane is limited by vegetation. Clearing of vegetation has been recommended in the revised report.

11. The crash analysis section makes an incomplete statement in the second paragraph. It is assumed that it was meant to state that there were no fatalities in the corridor for the three-year period. This statement should be corrected in the revised report.

Response: Noted, correction has been made.

No-Build Traffic Volumes

12. A 1.0 percent annual growth rate was applied to the Existing traffic count data for the Build year of 2021 to account for background traffic growth within the study area. This growth rate is appropriate for the study area.

Response: Noted, no action necessary.



13. The study addresses that there are no other major developments anticipated that would impact traffic within the study area. Based on VNE's review of the projects currently under review with the Office of the State Traffic Administration (OSTA), no additional developments were identified that should be accounted for in the study. The applicant should confirm with the town that there are no other new developments that are approved or pending that could contribute additional traffic within the study area.

Response: Noted, no action necessary. It was confirmed with the town there are no other new developments approved or pending contributing additional traffic within the study area.

14. The traffic volumes depicted in the 2021 No-Build Traffic Volumes (Figure 3) accurately reflect the application of the annual 1.0 percent background growth rate to the existing traffic volumes as identified in the study.

Response: Noted, no action necessary.

15. The 2020 Existing and 2021 No-Build traffic volumes include the traffic volumes that were observed to enter and leave the site during the weekday morning and afternoon peak-hour counts collected in 2018 at the signalized site driveway on Research Parkway. These volumes should be removed from the figures and analysis since these trips are not currently visiting the site and are not expected in either the 2021 No-Build or Build scenarios. These trips can be removed from the adjacent intersections so that they balance with the site driveway volumes. The removal of these volumes will improve operations at the site driveway and the adjacent intersections.

Response: Noted, originally to be conservative, the volumes from 2018 on site were kept. Due to other revisions the volumes were removed, and all other intersections were be rebalanced to reflect the change.

Trip Generation and On-Site Circulation

16. The traffic study uses tenant-specific trip generation data for forecasting the 2021 Build condition traffic volumes. As presented in the study, the new facility will be operated to minimize the number of site-generated trips during the peak-hours of the adjacent street traffic. Has the use of the tenant-specific trip generation data been approved by the Office of the State Traffic Administration (OSTA) for this project?

Response: Similar projects in Connecticut with the tenant-specific trip generation data have been approved by Office of the State Traffic Administration (OSTA) on a case-bycase basis. Using tenant-specific trip generation allows for more accurate data rather than similar uses from ITE, where there are minimal studies presented. The client is currently working with the ITE to incorporate the land use and is providing data to ITE to support.



17. The traffic report should provide additional discussion on how the tenant-specific trip generation compares with other similar Land Use Codes (i.e. Warehouse, High Cube Warehouse) in the ITE Trip Generation Manual and why the tenant-specific trip generation is the most appropriate for modeling the traffic impacts of this development.

Response: Noted, a comparison in trip generation table has been provided in the report.

18. The traffic report identifies that there will be 2,196 trips per day using the site. The description of the operations and associated trips provided in the report identifies the shifts when the various associates, managers, dispatchers, and drivers will be onsite. It is not clear how the various employee trips add up to the 2,196 trips per day from the writeup provided or what the peak hours of the new delivery station will be. Can a table be provided in the report that shows the estimated trips entering and exiting the site by hour for each of the site driveways over a typical 24-hour period for each of the various employee designations (i.e. associates, managers, dispatchers, drivers)? This information will provide a better understanding of the peak hours of the proposed development and the timing of trips to and from the site.

Response: Noted, tenant-specific trip generation data has been provided in the appendix of the report.

19. The number of parking spaces provided on the site suggest that there will be periods when the trip generation will exceed the 2,196 trips per day. The 1,033 van parking spaces is three times the 344 vans reported to enter and leave the site each day. Assuming an 85 percent parking utilization rate, it is expected that 400 +/- spaces would sufficiently accommodate the daily van load. Assuming an 85 percent parking utilization of the total 1,508 parking spaces proposed on site with a single turnover for each of these spaces per day would correlate to approximately 2,564 trips per day. With higher turnover rates for these parking spaces during shift changes or during periods with higher parking utilization, additional trips can be expected. Additional information should be provided to demonstrate how the parking will be used for the delivery station operations and how much the trip generation would be expected to increase during periods when the parking is fully utilized.

Response: The additional parking is required for anticipated peak holiday traffic at the Site. 24-hour traffic generation charts have been added to the appendix of the report. Additional analysis for the Holiday Peak is also provided in the Appendix of the report. Charts showing the number of vehicles on Site at any time over a 24-hour period during steady state and Holiday period have been attached to this response to comments.



Estimation of Net Vehicles on Site: <u>Average Weekday</u>

Estimation of Net Vehicles on Site: Holiday Season





20. The traffic report should address how much the trip generation is expected to increase during the holiday season peak. Additional analysis should be provided to demonstrate how traffic operations will be impacted during this peak season.

Response: A holiday season analysis was performed per town peer review request and included in the Appendix for comparison. It should be noted CTDOT does not require holiday analysis per OSTA Major Traffic Generator Administrative Decision Request Guidelines, Section III (Traffic Information) D-3. Only during the PM Build Holiday Peak Hour, the intersection of Route 68 (Barnes Road) at Interstate 91 Northbound Exit 15 On/Off-Ramps perform at LOS F with 90 second delay. Certain movements at signalized intersections are projected to perform at LOS E /F that is generally considered undesirable motorist delay, these are:

- Route 68 (Barnes Road) at Interstate 91 Southbound Exit 15 On/Off-Ramps:
 - Route 68 Eastbound Thru (PM Build and PM Build improved)
 - Exit 15 Off-Ramp SB Left/Right (All PM Scenarios)
- Route 68 (Barnes Road) at Interstate 91 Northbound Exit 15 On/Off-Ramps
 - Route 68 WB Thru (All PM Scenarios)
 - Exit 15 Off-Ramp NB Right (All PM Scenarios)
- Route 68 (Barnes Road) at Hotel Drive and Research Parkway:
 - Route 68 WB Thru (All AM Scenarios)
 - Research Parkway SB Left/Thru (PM Build)

For holiday analysis, build conditions and build improved scenario was included.

21. Based on the description of operations provided in the report, it appears that one of the peak-hours of the development will occur between 10:10 a.m. and 11:10 a.m. when approximately 344 delivery vans will exit the site at a rate of 160 vans every 20 minutes. Has any analysis been performed at the signalized intersections of Research Parkway with the site driveway and Barnes Road during this period? It is anticipated that this release of vehicles during this one-hour period may change the peak-hour on Research Parkway to this time. Signal adjustments may be needed at these locations to minimize delays during this peak period. A similar analysis should also be performed during the period between 7:10 p.m. and 8:50 p.m. when the delivery vans will return to the site and the returning drivers will leave the site to travel home.

Response: Typically, the off-peak times are not analyzed as the adjacent street traffic is less than the peak hour traffic on roadways. The ATR data on Route 68 (Barnes Road) indicates that the AM peak hour of adjacent street traffic is 7-8AM with 1918 vehicles; the 10-11AM hour has 1034 vehicles or roughly ½ the amount of traffic on the road. Thus, the addition of site-generated traffic is not expected to change the peak hour on Research Parkway. The morning and evening peak hours for this generator during the 10:00 AM-11:00 AM and 7:00 PM-9:00 PM hours have been included in the analysis to alleviate any concerns.



22. Can additional information be provided on the "Flex" delivery and how this system will work for this site? Additional information should be provided on where the "Flex" drivers will pick-up packages and where they will park.

Response: The "Flex" delivery system works similar to ridesharing programs where drivers can choose their availability during the "flex" driver window for delivery, typically between 4:30 PM and 6:00 PM. Traditional passenger vehicles privately owned by "Flex" drivers enter the facility staggered between that time frame. Flex vehicles will load and depart every 15 minutes. Per the traffic study, the Site is expected to employ approximately 90 "flex" drivers at this location. These trips have been accounted for in the traffic study.

When "Flex" drivers arrive at site they follow the same circulation pattern as the vans and park inside the warehouse building for pick-up. The "Flex" drivers shift is separate from the vans shift and will have no issues with staging.

23. The traffic report identifies the historic peak-hour trips for the previous Bristol Myers site from the 2003 Wilbur Smith traffic study to be 620 vehicles per hour in the morning and 535 vehicles per hour in the afternoon. Is there an estimate of the daily trips that could have been expected for the Bristol Myers site to provide a daily comparison with the proposed development?

Response: The previous Bristol Myers study did not indicate daily trips. But the previous Bristol Myers site was 1,002,632 SF with 1,961 spaces. ITE Land Use Code: 760 Research and Development Center would have generated approximately 11,000 daily trips to the Site.

Trip Distribution

- 24. According to the study, the trip distribution patterns presented in Figure 4 are based on population densities, competing opportunities, existing travel patterns, and the efficiency and limitations of the existing roadway system. The trip distribution percentages are listed below:
 - a. 20 percent to/from points north via I-91
 - b. 30 percent to/from points south via I-91
 - c. 20 percent to/from points east via Route 68 (Barnes Road)
 - d. 15 percent to/from points west via Route 68 (Barnes Road)
 - e. 15 percent to/from points north via Research Parkway

The trip distribution presented in Figure 4 is appropriate for use in this study.

Response: Noted, no action necessary.



Anticipated Site Generated Traffic Volumes

- 25. The site-generated traffic volumes presented in Figure 5 were appropriately distributed according to the trip distribution patterns presented in Figure 4, with the exception of the following approaches during the weekday afternoon peak-hour:
 - a. Southbound Research Parkway approach to Barnes Road
 - b. Westbound Barnes Road (Route 68) approach to the I-91 northbound ramps
 - c. Westbound Barnes Road (Route 68) approach to the I-91 southbound ramps

These noted differences are not expected to have a significant impact on the capacity analyses.

Response: Noted, Figure 5 Site Generated Traffic Volumes revised at the listed approaches.

Build Traffic Volumes

26. The Build traffic volumes presented in Figure 6 should be revised to address the traffic volume balancing and site assignment differences noted in comments #6 and #25.

Response: Noted, revisions in accordance to comments #6 and #25.

Roadway Adequacy & Capacity Analysis

27. The capacity analysis performed for this traffic study follows the standard traffic engineering methodologies outlined in the Highway Capacity Manual and was performed using Synchro software to provide a comparison between the 2020 Existing, 2021 No-Build and 2021 Build Scenarios.

Response: Noted, no action necessary.

28. The Existing midday Synchro analyses appear to be using the No-Build traffic volumes. The Synchro analysis for the Existing weekday midday peak should be revised to use the existing volumes. Table 5 should be updated with the revised results. This change is not expected to have a significant impact on the results that are reported.

Response: Noted, revision made in report.



29. The heavy vehicle percentages used in the capacity analysis are not included in the Synchro reports. The heavy vehicle percentages obtained from the traffic counts should be used in the Existing and No-Build Synchro models and the forecasted truck percentages should be used in the Build Synchro models. If the default two percent heavy vehicle percentage was used, then it should be checked that the default percentage matches or exceeds that recorded during the traffic counts for each of the movements.

Response: Noted, revision made in analysis.

30. The traffic capacity analyses use the default peak hour factor (PHF) of 0.92, which represents relatively uniform flow at the approaches throughout the peak-hour. The PHFs obtained for each approach from the traffic counts should be used in the Synchro models to account for the peak 15-minute flow rates at each approach during the peakhours.

Response: Noted, revision made in analysis.

31. The southbound right-turn movement at the intersection of the I-91 southbound ramps with Route 68 (Barnes Road) should be modeled as No Turn on Red to be consistent with the signal plan and report writeup.

Response: Noted, revision made in analysis.

32. The northbound right-turn movement at the intersection of the I-91 northbound ramps with Route 68 (Barnes Road) should be modeled as No Turn on Red to be consistent with the signal plan and report writeup.

Response: Noted, revision made in analysis.

33. The link speeds used in the Synchro models at the Barnes Road (Route 68) approaches should reflect the free-flow speeds on Route 68.

Response: Noted, revision made in analysis.

34. The offset times entered for the intersection of the I-91 southbound ramps with Barnes Road (Route 68) should be revised to reflect those listed in the CTDOT time-space diagrams for each of the time periods analyzed. While this intersection is listed as the master intersection, the offset times provided in the time-space diagrams should be used to reflect the actual offsets between the intersections in the coordinated system.

Response: Noted, revision made in analysis.

35. The yellow time and minimum splits modeled at the eastbound Barnes Road approach to the I-91 southbound ramps and the westbound Barnes Road approach to the I-91



northbound ramps should be revised to account for the 3.5 second yellow time per the signal plans.

Response: Noted, revision made in analysis.

36. The signalized intersection of Research Parkway with the Food Bank Drive/Site Drive #1 was observed to be running in Flash during the peak-hours based on recent site visits. This intersection is presently operating as a two-way stop-controlled intersection with stop-control on the driveways. The Existing and No-Build models should reflect the current operations at this intersection.

Response: Noted, revision made in analysis.

37. The signal timings used for the analysis of the intersection of Research Parkway with the Food Bank Drive/Site Drive #1 do not match the existing signal plan. The Synchro models use a maximum 140 second cycle length, whereas the signal plan shows a maximum 100 second cycle length. The maximum splits should be revised to match those provided on the signal plan. This signal is also being modeled as being part of a coordinated system but should be revised to be modeled as actuated-uncoordinated since it is not part of a coordinated signal system. The vehicle extension times at this location should also be revised to match those listed on the signal plans.

Response: Noted, revision made in analysis.

38. Minor differences were noted when comparing the volumes presented in the traffic figures to those included in the Synchro models. While these differences are not expected to have a significant impact on the results, they should be revised to match.

Response: Noted, revision made in analysis.

- 39. Some of the results that are reported in Table 5 do not match the Synchro reports. The following results should be checked and revised, as appropriate:
 - a. Queue lengths at Exit 15 SB approach to Barnes Road during morning peak under Existing conditions. The 50th percentile queues were reported.
 - b. Queue lengths at Route 68 WB thru during the afternoon peak under No-Build and Build conditions should be revised to be consistent with those listed for the Existing condition.
 - c. Queue length and V/C ratio at the Route 68 WB right-turn at the I-91 NB ramps during the evening peak under Existing conditions.
 - d. LOS at Food Bank Drive EB left-turn at Research Parkway during the evening peak under Build conditions.
 - e. V/C Ratio at Food Bank Drive EB right-turn at Research Parkway during the midday peak under Build conditions.
 - f. V/C Ratio at Research Parkway NB left-turn at Site Drive #1 during the midday peak under Build conditions.



- g. Queue length at Research Parkway NB thru at Site Drive #1 during the midday peak under Build conditions.
- h. LOS and V/C ratio at the Joseph Carini Road EB approach to Research Parkway during the evening peak under Existing and No-Build conditions.
- i. V/C ratio at Marlin Software Driveway EB left/right-turn at Research Parkway during the midday peak-hour under Build conditions.
- j. Missing queues at Marlin Software Driveway EB left/right-turn at Research Parkway during the morning peak-hour under Existing conditions.
- k. Missing queues at Research Parkway NB left-turn at Marlin Software Driveway during the evening peak under No-Build Conditions
- 1. Queues reported in Synchro reports for the intersection of Research Parkway at Carpenter Lane are provided in terms of car lengths. The queues presented in Table 5 should be reflected accordingly by multiplying the calculated car lengths by 25 feet.
- m. V/C ratio at Site Drive #2 NB right/ left-turn at Carpenter Lane during the midday and evening peaks under Build conditions.
- n. V/C ratio at Carpenter Lane EB approach at Site Drive #2 during the peak under Build conditions.

Most of these differences are minor and do not represent a significant change in the performance measures at these approaches, but they should be corrected in the revised report.

Response: Noted, Table 5 has been updated from revision made in analysis.

40. In Table 5, the eastbound approach at the intersection of Research Parkway at Food Bank Drive/Site Drive #1 is listed as being for Site Drive #1 and the westbound approach is listed as being for the Food Bank drive. These descriptions should be revised so that the eastbound approach is for the Food Bank Drive and the westbound approach is for Site Drive #1.

Response: Noted, Table 5 has been revised.

41. While no queuing issues were noted, Table 5 should be revised to include the available storage provided for each of the movements to demonstrate that there is adequate queuing space for each of the movements.

Response: Noted, tables 5.1 through 5.3 with operational analysis results include storage length.

42. The legend at the bottom of Table 5 should be revised to include the meaning of the '#' and 'm' designations in the results.

Response: Noted, revision made in report.

43. The westbound left-turn from Site Drive #1 and the eastbound left-turn from the Food Bank driveway at the intersection with Research Parkway are projected to operate at LOS



E under the Build condition. While these approaches are expected to operate at the same LOS as the No-Build condition, are there signal timing improvements that can be made to improve operations for both the driveways?

Response: The revision of the traffic signal timing to the 100 sec cycle revised the LOS and both approaches operate at acceptable LOS now.

44. The discussion of the capacity analyses results presented on page 32 of the report identifies that the Site #2 driveway right/thru onto Research Parkway NB will operate at LOS E. This statement does not match the results presented in Table 5 and it should refer to the Site #2 driveway left onto Research Parkway SB.

Response: Noted, Table 5 and the discussion have been updated from revision made in analysis.

Site Access

45. The traffic study appropriately determines the required intersection sight distance at Site Drive #2 on Carpenter Lane as 500 feet per the CTDOT Highway Design Manual for a 45 mile-per-hour 85th percentile speed. The proposed Site Drive #2 location is noted in the traffic report to meet this requirement. Based on a field review of the new site drive location, the new site driveway is expected to improve the sightline looking right when exiting the site as compared to the current driveway location.

Response: Noted, no action necessary.

46. A No Left Turn sign should be considered for the southbound traffic on Carpenter Lane in the vicinity of Site Drive #2 to reinforce the right-in/ left-out driveway configuration.

Response: Noted, a "No Left Turn" sign has been added to the plan for the westbound traffic on Carpenter Lane.

Off-Site Traffic Impact Mitigation

47. One of the recommendations from the traffic report is to restripe the lanes at the southbound Research Parkway approach to Barnes Road (Route 68) to provide 11-foot lanes to allow for wider receiving lanes for semi-trailers making left-turns onto Research Parkway from the eastbound left-turn lane from Barnes Road. The WB-67 truck turn maneuver shown in Figure TT-2 shows the left-turn from the eastbound center lane on Barnes Road, which is the required maneuver from this lane between 6:30 and 9:30 a.m., Monday through Friday. The proposed striping change is expected to better accommodate this maneuver for this situation. Since there is no signage designating which lane trucks must turn from, this left-turn should also be evaluated for instances



when a WB-67 truck is in the inside lane and the SU-30 vehicle is in the outside turn lane.

Response: Noted, a truck turning templates has been provided.

48. The traffic report recommends relocating the STOP bar at the northbound Research Parkway Approach to Site Drive #1. A figure showing the truck turning template and the location of the new STOP bar should be provided in the traffic study to demonstrate the need for this change.

Response: Noted, a truck turning template and new STOP bar location have been provided.

Summary and Conclusions

49. The summary and conclusions should be updated based on any additional or revised analysis.

Response: Noted, the summary and conclusions have been updated.

50. The site of the proposed delivery station is certified as a Major Traffic Generator (MTG) with the CTDOT Office of the State Traffic Administration (OSTA). The proposed development also meets the definition of a MTG and will need to be permitted with OSTA.

Response: Noted, no action necessary. Project will be submitted as a MTG to CTDOT OSTA.

On-Site Circulation and Parking

51. The total required number of parking spaces identified in the Parking Information Table is listed as 176.5 spaces. Based on the ratios listed in the table, the total parking requirement per the zoning regulations should be 190 spaces.

Response: Noted, the revision has been made in the report.

52. Based on the ITE Parking Generation Manual for Land Use Code 150: Warehousing, the average peak period parking demand for a 219,000 square-foot GFA warehouse is 85 parking spaces. The 85th percentile peak parking demand is 243 parking spaces. The proposed site plan proposes 1,508 total parking spaces, which exceeds the minimum zoning requirement and the 85th percentile demand per the ITE Parking Generation Manual.

Response: Noted, no action necessary.



53. Additional information should be provided on the need for the 1,033 van parking spaces. It is not clear why so many van spaces are needed when the traffic study identifies that 344 delivery vans will leave the site in the morning and return each evening.

Response: See comment response #19.

We trust the questions have been answered and concerns addressed. If further information is required, feel free to contact me at 203-608-2416.

Sincerely,

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Michael Dion, P.E., PTOE Senior Project Manager