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Memorandum

DATE: July 7, 2021

TO: Mark Stagg, Jay Martino, Kathleen Bradshaw

FROM: Lou Luglio, P.E., Vice President
Nanette H. Bourne, Director Hudson Valley Services

RE: **Response to Correspondence from Stephan A. Maffia, P.E., F&A (6-23-21)**

INTRODUCTION

Provided in this memorandum are responses to comments received from Stephan A. Maffia, P.E., F&A dated June 23, 2021, concerning the proposed Stagg Development Corporate Office Headquarters project located at 1 Bradford Road in Mount Vernon, New York (the "Project Site").

Responses to Comments Concerning Traffic and Parking

1. **Comment**: The EAF's indicate that there would be no substantial increase in traffic, but there is no support for this conclusion

   Response: The principal arterial roadway that would be used to gain access to the Project Site is East Lincoln Avenue. As detailed in the attached Technical Memorandum dated July 6, 2021, traffic flows on East Lincoln Avenue reflect a typical temporal distribution with distinct commuter peaks for the AM and PM peak hours with closely balanced volumes in each direction. In the eastbound direction, traffic peaks at 525 vehicles at 8:00AM. In the westbound direction the peak is at 585 vehicles at 5:00PM. The theoretical capacity for a principal arterial roadway, as determined by standard traffic engineering guidelines, is approximately 700 vehicles per lane per hour (determining the actual capacity for a specific roadway segment would require a traffic modeling capacity analysis). Based on the trip generation estimates and the trip assignments, the intersection of East Lincoln Avenue at Wilson Woods Park Road would experience a total increase of 29 vehicles during the AM peak hour and 23 vehicles during the PM peak hour. This represents less than a 5% increase in overall traffic volumes at the intersection of the two roadways. The traffic assessment indicates that the area roadways will still have capacity to absorb and accommodate the "new" vehicle trips generated due to the proposed development.

2. **Comment:** There are 131 existing spaces, and they are planning to provide 103 off-street spaces – a reduction of 29 spaces. No analysis was done to confirm that the parking would be sufficient.

   Response: The proposed development will include 130 off-street parking spaces, substantially equivalent to the number of parking spaces that current exist on the Project Site. All parking would

occur in the front of the building and be used by tenants of the building. No construction trucks would be parked in this area. Limited parking for construction trucks would be provided at the rear of the site. The proposed development would provide space for approximately 30-35 employees who would drive to the Project Site in the morning between 8 am and 9 am and leave the Project Site between approximately 5 pm and 6 pm. All employees and tenants would park on the Project Site.

Based on Institute of Traffic Engineers (ITE) *Parking Generation Manual 5th Edition* parking generation estimates for General Office Buildings of 38,000 square feet (sf) would generate a demand of 116 vehicles. The 130 on-site parking spaces would provide sufficient capacity for the proposed development.

3. **Comment:** There may be significant negative impacts on traffic flows on the park access road to the site and at intersections along East Lincoln Avenue. Also, the potential impacts of insufficient parking on-site have not been determined.

   Response: See Responses to Comments 1 and 2.

4. **Comment:** It is clear from the application that there will be an increase in trucks travelling from East Lincoln Avenue to and from the site along the County-owned Park drive throughout the day.

   Response: It is projected that approximately two to three construction vehicles would be dispatched from the Project Site in the morning, with some of those trucks returning to the Project Site in the late afternoon, while others would remain at job sites. Typical construction trucks would include tri-axle trucks, cargo box trucks, and construction box vehicles. The largest of which would be the tri-axle dump truck. There would be no 18-wheel trucks using the site.

   Once a construction vehicle has been assigned to a construction project, it would typically remain on the construction site through completion of the construction project. It is anticipated that a maximum of approximately six construction-related truck trips per day would be generated by the proposed project (three leaving the site in the morning and three returning to the site at the end of the workday).

5. **Comment:** The specific number, type and size of the trucks that would access the site, as well as their travel schedule must be provided.

   Response: See response to Comment 4.

6. **Comment:** A review from the Westchester County Planning Commissioner noted the potential for increased truck volume activity to damage the park access road.

   Response: See Response to Comment 4. The projected maximum number of construction truck trips of approximately six trips per day is not anticipated to result in significant damage to the park access road.

7. **Comment:** The County identified the park access road as not being designed to accommodate regular daily truck use.

Response: Wilson Woods Park Road is a two-way, two-lane roadway with a posted speed limit of 25 MPH. Walking paths are provided in some areas and weave in and out of the park near the roadway. Parking is prohibited on both sides of the roadway. The roadway is categorized by NYSDOT as a Major Collector Roadway (Class 17) which is defined as a roadway that provides traffic circulation within residential neighborhoods, commercial and industrial areas. A primary purpose of a major collector roadway is to collect traffic from local streets and channel it into the arterial system. The roadway has sufficient cross-section and safe sight stopping distance to allow for its use by trucks.

It should be noted that Wilson Woods Park Road is not a truck route due to a Metro North overpass with a 12'3" clearance – effectively prohibiting trucks from travelling into adjacent neighborhoods, and is not designed to accommodate heavy truck traffic. The limited number of trucks that will access the proposed use will be similar in size to trucks currently using the road to deliver supplies and to support activities at Willson's Woods Park.

8. **Comment**: The applicant must provide an analysis of the existing road regarding its construction and physical condition as well as the likely impacts of the estimated additional truck activity associated with the site development.

   Response: See responses to Comments 4, 5, 6, and 7. Site survey indicates that Wilson Woods Park Road is in fair to good condition along its length, similar to the condition of numerous roadways in southern Westchester.

9. **Comment**: If the projected frequency and loading of trucks is beyond the capacity of the park road to accommodate those uses, then either truck trips should be reduced/prohibited on the park road or, the road should be reconstructed to a higher standard by the applicant.

   Response: See responses to Comments 4, 5, 6, 7, and 8. Necessary improvements to address needed maintenance of Wilson Woods Park Road is the responsibility of Westchester County.

10. **Comment:** The County will make the final determination regarding the disposition of the park access road.

    Response: Noted.

11. **Comment:** An increase in truck activity would increase the level of noise along the park access with the potential to negatively impact the adjacent park lands.

    Response: As described in the response to Comment 1, the peak traffic periods would be during the AM and PM peak commuter periods, when Wilson Woods Park Road would experience a total increase of 29 vehicles during the AM peak hour and 23 vehicles during the PM peak hour. It should be noted that this peak coincides with additional Metro North commuter train traffic along the adjacent track. In addition, it is projected that a maximum of three construction trucks would

travel on Wilson Woods Park Road in the morning and afternoon. All motor vehicles, including trucks, travelling on Wilson Woods Park Road would be restricted to 25 mph.

Human ability to perceive a change in noise levels from motor vehicles is based on the change in the number of "passenger car equivalents" at a given location within a given hour, in which vehicular traffic volumes are converted into PCEs values, in which one medium-duty truck (having a gross weight between 9,900 and 26,400 pounds) is assumed to generate the noise equivalent of thirteen cars, one heavy-duty truck (having a gross weight of more than 26,400 pounds) is assumed to generate the noise equivalent of 47 cars, and one bus (vehicles designed to carry more than nine passengers) is assumed to generate the noise equivalent of eighteen cars. A human can generally perceive a change in noise levels with a doubling (or halving) of PCEs. Although potentially noticeable, depending on the volume of traffic that currently travels on Wilson Woods Park Road, increased noise levels that would result from this increase in traffic would not be significant given the very limited duration of the noise increases. Since significant levels of traffic, including delivery trucks, currently use Wilson Woods Park Road to gain access to Willson's Woods Park resulting in increased noise levels adjacent to the roadway.

Assuming no motor vehicles currently travel on Wilson Woods Park Road, there would be the potential for a perceptible change in noise levels during peak travel hours. However, since noise levels along Wilson Woods Park Road are currently affected by existing motor vehicle traffic, including trucks, perceptible changes in noise levels would be unlikely. The 25 mph-restriction in vehicle speed would further reduce the potential for significant noise impacts, since the noise generated by tire/pavement interaction would be substantially imperceptible by the human ear.

Responses to Comments Concerning Proposed Site Plan

1. **Comment:** The plans must include truck turning radii at the entrance to the site, along the park access road and within the site where trucks would back or otherwise maneuver. This should be required to ensure that such turns and maneuvers have sufficient area to make those movements easily and safely.

   Response: Based on a site survey completed on July 6, 2021, and an assessment of the required turning radius for the largest truck (tri-axle dump truck) that would enter and exit the Project Site, there would be sufficient room at the intersection of the proposed project and Wilson Woods Park Road to safely enter and exit the Project Site. Based on a review of the proposed project site plan, there is sufficient space is provided within the Project Site to safely turn this size vehicle.

2. **Comment:** The sight distance from the driveway to the park access road – in both directions – must be included on the plans to ensure that safe stopping and intersection distances are provided.

   Response: The *American Association of State and Highway Transportation Officials Green Book 2018* ("AASHTO Green Book 2018") recommends that a minimum of 155 feet of stopping sight distance be provided for a design speed of 25 MPH. Based on field observations and a review of available high-resolution aerial imagery, the site driveway will continue to provide adequate sight

distance to facilitate site access. Specifically, field observations on July 6, 2021 and a review of available high-resolution aerial imagery indicate that there is adequate site distance to both the south of the entrance to the Project Site and to the north of the entrance to the Project Site along Wilson Woods Park Road. A sight distance exhibit is included in the July 7, 2021 updated Traffic and Stormwater Technical Memorandum.