

Appendix L: Tab 2

John O'Brien

From: Gordon Stansbury <gtsconsulting@twcny.rr.com>
Sent: Friday, April 22, 2022 11:51 AM
To: John O'Brien
Subject: Traffic Impact Assessment - District East
Attachments: Traffic Impact Study - District East Development - Town of DeWitt.pdf

[EXTERNAL EMAIL]

John,

I have attached the completed traffic impact study for the District East development for your review. I decided to complete it with all of the proposed driveways and we can let NYSDOT comment before we give anything up.

Overall, the existing network can handle the project development traffic without any significant off-site mitigation. Other than modifications to convert the Grenfell Road access to full access and the Kinne road right in only driveway to full access, I have only recommended signal timing adjustments along Erie Boulevard.

I have not included the 20% sensitivity analysis that we discussed as we are right at capacity at the Erie/Genesee intersection with the eastbound left turn movement onto Erie Boulevard. The timing adjustments get the intersection close to background operations but there are some significant increases in the westbound delay to accommodate this. I do not expect NYSDOT to be very happy with it, but there is no space to widen that intersection.

I will forward my invoice shortly for the study. Let me know if you have any questions or need anything.

Thanks

Gordon

Gordon T. Stansbury P.E., PTOE

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November 8, 2022

Mr. Jeff Davis
Barclay Damon LLP
Barclay Damon Tower
125 East Jefferson Street
Syracuse, New York 13202

Via Email

**Re: Review of Full EAF Part 1 and Exhibits for District East
OCIDA Environmental and Engineering Services Support
JMT Job #22-02972-001**

Dear Mr. Davis,

As requested by Barclay Damon LLP, JMT of New York, Inc. (JMT) has reviewed the full Environmental Assessment Form (EAF) Part 1 and the accompanying thirteen exhibits for District East, a proposed development project in the Town of DeWitt. The materials were prepared to comply with the requirements of the State Environmental Quality Review Act (SEQR) and were received by JMT on September 5, 2022.

Upon review of the materials received, JMT provides the following comments:

Full Environmental Assessment Form Part 1, dated August 29, 2022

A. Project and Applicant/Sponsor Information.

Project Location. A general location map was not included. Additionally, tax parcel identification numbers may need to be included, if requested by Town of DeWitt.

Brief Description of Proposed Action. Exhibit B, *Site Master Plan* is included but is not a substitute for a complete drawing set, showing detailed existing and proposed conditions.

B. Government Approvals.

B.a, B.b., B.d, B.e, and B.g. Please indicate the types of approvals required, not just the approving agency. Additionally, note the plan set provided is inadequate in determining if a zoning board approval is required, which is based on setbacks, lighting, etc.

B.c. This may need to be answered, "yes" after the Town of DeWitt reviews the proposed plans.

B.ii. Note, although the Town of DeWitt does not currently have an approved LWRP, one is currently being developed. This answer may need to be changed if a plan is adopted prior to document acceptance.

C. Planning and Zoning.

C.2.a. Please confirm the plan being referenced here is the Town of DeWitt Comprehensive Plan. If so, please provide the specific recommendations for the site where the proposed action is per the Town's Comprehensive Plan.

C.2.b. A district overlay zoning classification is generally not considered a local or regional special planning district. (Some examples of special planning districts include: Local Waterfront Redevelopment Plan, Transportation Corridor Plan, Brownfield Redevelopment Plan, Habitat Protection Plan, Watershed Protection Plan, Historic District, Statewide Area of

Scenic Significance and Critical Environmental Area.) Please verify the site location is not associated with any *special planning districts* and revise the answer, as applicable. Refer to the NYSDEC EAF Workbook for additional guidance on completing this question.

C.3.c.i. Name/title of attachment is missing. Only states, "see attached". Also recommend stating that the site is located within Mixed-Use Village III (MUV-3) and within Business (B) on the DeWitt Zoning Map.

C.4.c. The EAF refers to rural metro for EMS services, but Exhibit C refers to ALS, AMR, EAVES, and TLC. This discrepancy should be addressed.

C.4.d. Ryder Park and Cedar Bay Park are approximately the same distance away from the site as the resources listed. Recommend adding these parks, or stating what the search criteria are for the parks that serve the site.

D. Project Details.

D.1.b. Review and revise acreages, as appropriate. This section indicates the acreage of the total project site and contiguous parcels owned/controlled by the applicant is less than the acreage of the project site and area to be disturbed.

D.1.e. Please provide additional details on phasing and related scopes referenced.

D.1.f. Note, there are no associated plans which show the details for comparison purposes.

D.1.g. Reference to Exhibit D, Architectural Elevations & Perspectives is provided here, but these renditions do not provide any dimensions (building size, height, etc.) or useful information in reviewing project impacts.

D.1.h.iv.; v.; vi. These questions are left blank, but should be answered.

D.2.c.i. Recommend that an explanation is provided to detail the total anticipated water usage/demand per day of 50,000 gallons. (See comment regarding Exhibit C below.)

D.2.d.iii. Typo in response to "Describe extensions or capacity expansions proposed to serve this project."

D.2.d.vi. Question is left blank. This should be answered.

D.2.e. Question is left blank. This should be answered with the information provided in Exhibit H, which describes the surface water discharge point.

D.2.f.iii. How will the facilities be heated/cooled during operations? If heat will be provided through natural gas combustion and associated boiler, this should be included, and the capacity of the system noted.

D.2.g. Provide capacity of the "misc natural gas generators and roof top HVAC equipment". Also, provide the method used to determine a NYS State Air Registration is not required? (i.e., Any stationary engines above 400 HP or combustion sources greater than 10MMBTU being proposed?)

D.2.j. See comments on Exhibit I – Traffic Impact Assessment below.

D.2.k. The response to "Will the proposed action generate new or additional demand for energy" is selected as "no", but responses are provided in the "if yes" section. Please address discrepancy.

D.2.l. Confirm these hours comply with Town of DeWitt code and requirements.

D.2.m. See review comments on Exhibit K below regarding noise assessment.

D.2.n. A detailed Lighting Plan will need to be provided for review.

D.2.q. Indicates that there will be no pesticides or herbicides used during operation. Confirm the lawned areas will not use these types of chemical treatments during operation.

D.2.r.i. No amount of solid waste generated during operation is provided. As the proposed plan is for commercial (entertainment and retail establishments), please indicate the estimated amount of solid waste generated as part of the proposed action and provide the proposed disposal method.

D.2.r.ii. The question regarding recycling or re-use of materials is left blank. This should be answered.

D.2.r.iii. "County Transfer Station" does not indicate how the waste would be transported. Additionally provide additional details on "Construction disposal facilities".

E. Site and Setting of Proposed Action

E.1.b. Provide detailed project plan set that show existing and proposed conditions so that this section can be adequately reviewed.

E.1.d. The site location is within 1,500 feet (east) of DeWitt Community Church, which serves as a nursery school.

E.2.a, E.2.c., E.2.d., E.2.e., E.2.f. Confirm the source of this information. Are there any proposed geotechnical investigation proposed for this action? As a detailed project plan set showing existing and proposed conditions has not been provided, it cannot be determined at this time, if further investigations are warranted.

E.2.m. Question is left blank. This should be answered.

E.3.b.ii. Question is left blank. This should be answered.

E.3.h. Verify the distance between the project site and the Old Erie Canal State Historic Park. It appears to be much closer than 1.84 miles. Also, confirm the resources shown on the CRIS website (<https://cris.parks.ny.gov/>).

Exhibits

Exhibit B – Site Master Plan - District East

Please provide a complete plan set which includes the existing and proposed conditions.

Exhibit D – Architectural Elevations & Renderings – District East

Please provide architectural elevations, including heights of the existing and proposed buildings.

Exhibit E - Preliminary Wetlands Assessment – District East

Exhibit states there is a mapped NWI / NYSDEC wetland located 600' east of site and "A site visit by qualified personnel will be conducted to confirm these findings." What is the schedule of this reconnaissance? Will findings be provided to OCIDA once available?

Exhibit F – Water Distribution Assessment – District East

1. There is a typo in second word of second paragraph (JV partnership name).
2. Recommend titling attachments 1, 2, and 3, as referenced in the Exhibit.
3. Exhibit refers to "fire flow calculations", but they are labeled as "fire flow projections" on the attachment. Recommend using consistent language.
4. For clarification purposes, recommend including a table with definitions of construction types and required flow needed.

Exhibit G – Sanitary Capacity Assessment – District East

Typo in second word of second paragraph (JV partnership name).

Exhibit H – Preliminary SWPPP – District East.

The Exhibit specifies that this is a Preliminary SWPPP prepared in accordance with the SPDES Construction General Permit, New York State Stormwater Design Manual, and New York State Standards and Specifications for Erosion and Sediment Control. It is our understanding that a complete SWPPP will be prepared prior to submitting a Notice of Intent for coverage under the General Permit, meeting all New York State and Town of DeWitt requirements. However, certain items related to stormwater control that are required to make an environmental impact determination have not been included in the Preliminary SWPPP.

1. Provide a Stormwater Modeling and Analysis Report that includes:
 - Map(s) showing pre-development conditions and sub-drainage areas
 - Map(s) showing post-development conditions and sub-drainage areas
 - Summary table of pre- and post-development discharge rates

- Stormwater modeling output
 - Detention design sizing calculations
2. The site is within the Onondaga Lake Watershed. Post-construction stormwater management practices must be designed to conform to *Enhanced Phosphorus Removal Standards*, included in the technical standard, *New York State Stormwater Management Design Manual* ("Design Manual"). There is no reference to these standards and it is therefore unclear whether the design will conform to them. Please confirm and make the applicable reference in the appropriate section of the SWPPP, once updated.
 3. Erosion and Sediment Control (E&SC) Plan - must include all locations of proposed temporary and permanent stormwater management features and erosion and sediment control measures. Include specific location and size of each post-construction stormwater management practices. Details, including dimensions, material specifications, installation details, and operation and maintenance requirements for all erosion and sediment control practices. Include the location and sizing of any temporary sediment basins and structural practices that will be used to divert flows from exposed soils.
 4. Site Plan showing:
 - Areas of disturbance and areas that will not be disturbed;
 - Tabulated acreage of disturbed, impervious and pervious areas (pre- and post-construction) summing to total site acreage
 - Existing and final (proposed) contours
 - Material, waste, and equipment storage areas onsite and on adjacent properties
 - Location of stormwater discharges
 - All improvements
 - Drainage patterns (flow direction)
 5. Section 6.2d Authorized Non-Stormwater Discharges should add the term "uncontaminated discharges" at the beginning of the sentence regarding site dewatering to comply with GP-0-20-001.
 6. The blank Notice of Intent (NOI) form included in Appendix A is for GP-0-15-002, not GP-0-20-001. Also note, the NOI will need to be filed electronically, per Part II.B.2 of GP-0-20-001.
 7. In section 7.1 Erosion and Sediment Controls, the effective date in the reference to NYSDEC State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity (Permit No. GP-0-20-001) should read January 29, 2020, not January 29, 2015.
 8. Provide a site inspection schedule that conforms with the requirements of GP-0-20-001.

Stormwater Utility Assessment (provided in Exhibit H)

The map entitled "Available Stormwater Treatment Areas" layout does not match the Site Master Plan located in Exhibit B.

Exhibit I – Traffic Impact Assessment – Will Serve – District East

The applicant should supplement the submitted Traffic Impact Study (TIS) prepared by GTS Consulting, dated May 2022 to provide adequate details to support an environmental impact determination. The TIS follows a basic traffic study outline shell that is provided on the HDM Chapter 5 website. Using the HDM Shell file as a template does not provide enough information to adequately justify an environmental impact determination. NYSDOT does provide a more comprehensive outline to address some of the EAF questions in Part 2.

Review comments on the May 2022 TIS are provided below and should be addressed as applicable.

1. The study only reviews the intersections adjacent to the project site. How were the study limits chosen and other intersections not examined or included for potential impacts and mitigation? This includes the proximity to NYS RT 5 (Erie Blvd) and I-481 interchange.
2. The mall has existed for several decades with changes to the area occurring since then. The very soon planned I-81 construction will cause changes to future traffic patterns with increased use of I-481 for drivers to bypass the City which would affect traffic distributions. The TIS is written that the local MPO appears to not have been consulted for assistance in distributing new regional traffic patterns and distributions. What was the method used to distribute traffic as shown on page 10 of the TIS?
3. The TIS stated it used Syncho analysis software Version 10. However, NYSDOT Bulletin EB 21-016 dated 3/2021 for approved traffic software programs states to use Version 11.
4. The TIS collected traffic counts for heavy vehicles, but they are not mentioned in the report. The site development truck trips can also impact traffic patterns. Recommend expanding report writeup to cover these impacts.
5. The TIS does not include items related to public transportation or alternative fueled vehicles. The accommodations either nearby or on-site would affect air pollutant emissions and energy uses. Recommend expanding report writeup to cover these impacts.
6. Considering the current information provided to JMT on the 112,836 SF Educational/Institutional development, "Land Use 760 – Research & Development Center" may not be the best land use code choice. Recommend institutional codes (500-599), which are described as better suited for this development.
7. For comment above, if Land Use 760 is to remain, then the Saturday trips are high. There should only be 0.24 Saturday Peak Hour Trips/1,000 SF, or 27 total trips.
8. Recommend re-evaluating the use of the movie theater in the pass-by trip calculation.
9. Page 9 of the TIS uses an assumption for the 10% credit for transit and internal trips, can this be supported and explained further? The report also lacks describing the existing pedestrian / bicycle accommodations, bicycle routes and public/private transportation service facilities near the project.
10. Page 10 of the TIS very briefly describes parking. What is the number of new on-site parking spaces proposed? What is the net increase or decrease in parking?
11. Per HDM 5.2.3.6, the capacity analysis results are not presented in an organized summary table within the report and instead use multiple tables in Appendix F. Without a clearly organized table it is difficult to compare results and the effects from different scenarios and model years. Recommend combining and reorganizing the tables in Appendix F into a summary table in the main report section. Also recommend showing results for queues and even using color to help identify trouble areas.
12. Were the capacity analysis results in Appendix F performed per HDM 5.2.3.6 by reporting results using SimTraffic?

13. Analysis results for existing travel speeds are included in the main report section, but what are they under the proposed conditions? HDM Chapter 5-17, specifies how essential travel speeds are for congested areas and it helping to properly report results.
14. Mitigation measures typically do not include detailed timing adjustments. Per HDM 5-15, the models should have signals optimized. Instead, the recommended mitigation would include items such as signal coordination, intersection lane adjustments, intersection control type (stop, signal, roundabout), corridor widening/reduction, driveway access, interchanges and ramps, bike lanes/sidewalks access, transit stops, etc.
15. Page 13 of the TIS, with the signal timing mitigation only that was described, the report states that Erie Blvd / E Genesee St is still a LOS E for PM peak, and further mitigation would be needed. Please describe the mitigation being referenced.
16. Preliminary review of existing data inputs shows several discrepancies. The traffic count data in Appendix H does not match Traffic Figures in Appendix C or Synchro outputs in Appendix I. Example reference intersection is Erie Blvd / Kinne Rd, northbound thru shows 420 in count section, but 448 in synchro report and Figure 1. Southbound left shows 51 in count section, but 41 for synchro report and Figure 1. Note, the report states no seasonal correctional factor was applied.
17. Crash analysis was performed with some locations being above statewide averages. What are the recommended crash reduction measures?

Exhibit J – Energy Impact Assessment – District East

Attachments are missing titles.

Exhibit K – Construction Noise Assessment – District East

1. A more comprehensive discussion of the existing noise environment should be provided. Specifically, please discuss nearby potential sensitive receptors such as the neighborhoods to the south vs. less sensitive commercial areas to the north.
2. Please provide a discussion of the adequacy of the use of an "area source" in the noise impact model vs the use of a combination of point, line, and area sources. Additionally, please elaborate on how the sound power level was determined and assigned for each area source utilized in the various models. The report states that *"each phase was modeled as an area source contain the average sound emissions of all equipment that would operate within that are during each phase."* Was all equipment averaged or was the additive effect of multiple sound sources accounted for in the model? Also, please clarify if energetic average and/or energetic addition were utilized, or if standard arithmetic means were used.
3. Please provide additional detail on the inputs for each area source including the dimensions of the modelled area source. Please provide and discuss the modelled height of sound sources, and how the selected height is appropriate given the facts of the project (e.g., if utilized, how is universal source height appropriate given the diverse physical characteristics of the proposed equipment?).
4. Please provide model projection inputs (e.g., atmospheric absorption criteria, ground cover/absorption/reflection criteria, etc.).
5. Please provide a table that describes what specific equipment was included in each area source for the twelve (12) completed models, assigned sound power levels, applied use factors, and citations for all model inputs.

6. Please discuss the application of the "use factor", how each was selected per each type of equipment, and why the inclusion of the use factor was appropriate based on the facts of the project.
7. Was octave band data for each sound source used in the model? If so, please provide. If not, please discuss why omission of unique octave band data for each sound source is an acceptable method for assessing potential noise impacts.
8. Was the influence of ambient noise included in the model? E.g., are the noise contours indicative of the energetic addition of an ambient noise level and the noise generated by construction activities? Please provide what ambient sound level was included in the models. If none was used, please update the model to include underlying ambient/background noise levels.
9. According to NYSDEC Policy for Assessing and Mitigating Noise Impacts "*When an assessment of the potential for adverse noise impacts indicates the need for noise mitigation, it is preferred that specifications for such measures be incorporated in a noise analysis and in the applicant's work or operational plan necessary for a complete application.*" The provided noise assessment indicates that construction activities will produce impacts but provides no assessment of the adequacy of available mitigation measures to reduce impacts to acceptable levels, nor does it provide any discussion of how potential noise impacts will be monitored over the projects 10-year construction phase. Please update the analysis to demonstrate that measures mentioned in the assessment (e.g., physical barriers) will provide adequate abatement when necessary. Please also provide a discussion of how it will be determined that mitigative measures are required. E.g., will mitigation be complaint based, through noise level monitoring when in proximity to identified sensitive receptors, or based on a prescribed methodology such as "if a crane is utilized 138 feet or closer to the property line, noise abatement measures will be deployed", etc.
10. Please provide a discussion of why an assessment of noise impacts during the "operation" phase of the project is not warranted. Alternatively, please provide a scenario that assesses potential noise impacts during the operation phase.

Exhibit L – Threatened Or Endangered Species Assessment - District East

A formal project review request submission to USFWS (NY Field Office) is required. As stated in the generated *IPaC Resource List* the applicant provided, "...the list is for informational purposes only and does not constitute an analysis of project level impacts."

Exhibit M – OPRHP – District East

A copy of the consultation request which would consist of proposed project details and other information submitted to OPRHP for their review was not provided. It is recommended this information is provided to confirm proposed description is consistent with description included in the EAF.

Additional comments may be expected if other materials (including those which have been revised) are submitted in the future. If you have any questions regarding the information above, please feel free to contact Alexandra Carroll at (518) 218-5925.

Sincerely,

JMT of New York, Inc.



Alexandra Carroll, GISP
Associate



Robert C. LaFleur, PG
Vice President

Cc.: D. Long, JMT



GTS Consulting

1396 White Bridge Road
Chittenango, NY 13037
Tel: (315) 391-5110

November 29, 2022

Hueber Breuer
PO Box 515
Syracuse, NY 13205-0515

Attn: Mr. John O'Brien – Senior Project Manager

**Re: Response to JMT 11-8-2022 Traffic Study Comments – Proposed District East Development
Former Shoppingtown Mall – Town of DeWitt, NY**

Dear Mr. O'Brien:

I have reviewed the November 9th, 2022 comments from JMT regarding EAF Part 1 for the proposed District East development, specifically the comments related to the traffic impact study completed by GTS Consulting. The following provides a summary of the comments (in italics) followed by my response to each.

The applicant should supplement the submitted Traffic Impact Study (TIS) prepared by GTS Consulting, dated May 2022 to provide adequate details to support an environmental impact determination. The TIS follows a basic traffic study outline shell that is provided on the HDM Chapter 5 website. Using the HDM Shell file as a template does not provide enough information to adequately justify an environmental impact determination. NYSDOT does provide a more comprehensive outline to address some of the EAF questions in Part 2.

The traffic study was completed per NYSDOT scope requirements. It is noted that the proposed development is anticipated to be a lower traffic generator than the previous use as Shoppingtown Mall.

1. *The study only reviews the intersections adjacent to the project site. How were the study limits chosen and other intersections not examined or included for potential impacts and mitigation? This includes the proximity to NYS RT 5 (Erie Blvd) and I-481 interchange.*

NYSDOT was consulted prior to the start of the traffic study and provided requirements on time periods and study area intersections to be included in the study.

2. *The mall has existed for several decades with changes to the area occurring since then. The very soon planned I-81 construction will cause changes to future traffic patterns with increased use of I-481 for drivers to bypass the City which would affect traffic distributions. The TIS is written that the local MPO appears to not have been consulted for assistance in distributing new regional traffic patterns and distributions. What was the method used to distribute traffic as shown on page 10 of the TIS?*

The arrival/departure trip distributions were developed based on existing traffic patterns in the study area, population centers, and access to the expressways (I-481 & I690). Use of the SMTC regional demand models to develop the distributions was discussed with NYSDOT and was determined not to be necessary during the study scoping process.

3. *The TIS stated it used Synchro analysis software Version 10. However, NYSDOT Bulletin EB 21-016 dated 3/2021 for approved traffic software programs states to use Version 11.*

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Synchro10 was used for the capacity analysis. Although Synchro11 is the most current model, NYSDOT Region 3 has been accepting models completed in Synchro10 as the analysis results are not significantly different. The analysis will be updated in Synchro11 when the study is revised to address NYSDOT comments.

4. *The TIS collected traffic counts for heavy vehicles, but they are not mentioned in the report. The site development truck trips can also impact traffic patterns. Recommend expanding report writeup to cover these impacts.*

Heavy vehicle percentages that were collected as part of the traffic turning movement counts are included in the capacity analysis.

5. *The TIS does not include items related to public transportation or alternative fueled vehicles. The accommodations either nearby or on-site would affect air pollutant emissions and energy uses. Recommend expanding report writeup to cover these impacts.*

There were credits assumed in the trip generation estimate associated with multi-use trips as well as public transportation. Accommodations for public transportation/alternative fuel vehicles will not impact the overall traffic impact assessment and will be incorporated into the site plan during the site plan review process. There is space shown on the site plan behind building M that is envisioned to serve as a transportation hub for the site.

6. *Considering the current information provided to JMT on the 112,836 SF Educational/Institutional development, "Land Use 760 – Research & Development Center" may not be the best land use code choice. Recommend institutional codes (500-599), which are described as better suited for this development.*

This comment is noted. The educational/institutional land use code trip generation estimates are based on number of students as opposed to square footage, for which there are no current estimates. Land Use 760 was chosen as a specialized office type use as research/development could include an educational aspect.

7. *For comment above, if Land Use 760 is to remain, then the Saturday trips are high. There should only be 0.24 Saturday Peak Hour Trips/1,000 SF, or 27 total trips.*

The daily Saturday trip generation rate (1.91 trips/1,000 SF) was accidentally used instead of the peak hour rate (0.24 trips/1,000 SF). This results in a conservatively high trip generation estimate for the Saturday peak hour. This error has been corrected in the attached revised trip generation estimate for the development. The revisions to trip generation estimate are discussed in detail following the responses to comments at the end of this letter. The updated trip generation estimate will be used when the study is revised to address NYSDOT comments.

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8. Recommend re-evaluating the use of the movie theater in the pass-by trip calculation.

The movie theater use has been removed from the pass-by trip calculations in the attached revised trip generation estimate. The revisions to trip generation estimate are discussed in detail following the responses to comments at the end of this letter. The updated trip generation estimate will be used when the study is revised to address NYSDOT comments.

9. Page 9 of the TIS uses an assumption for the 10% credit for transit and internal trips, can this be supported and explained further? The report also lacks describing the existing pedestrian / bicycle accommodations, bicycle routes and public/private transportation service facilities near the project.

This is a conservatively low credit that is an engineering assumption to account for a percentage of the commercial or office generated traffic being drawn from the 500+ residential units proposed on the site, commercial traffic being drawn from people working on the site, as well as a portion of the residents, office, and commercial trips using public transportation. With the addition of a supermarket to the trip generation estimate, the multi-use/transit credit was increased to 15%. The revisions to trip generation estimate are discussed in detail following the responses to comments at the end of this letter. The updated trip generation estimate will be used when the study is revised to address NYSDOT comments.

There are existing sidewalks along the west side of Erie Boulevard and NYSDOT has planned signal improvements to add pedestrian crosswalks at the signals from Kinne Road to Genesee Street. There are existing bus stops along Erie Boulevard as well. NYSDOT has indicated that sidewalks along the property frontage will be required along Erie Boulevard. Internal on-site pedestrian, bicycle, and transit accommodations will be identified during the site plan review phase.

10. Page 10 of the TIS very briefly describes parking. What is the number of new on-site parking spaces proposed? What is the net increase or decrease in parking?

Planned parking spaces are identified on the site plan which is included in the study.

11. Per HDM 5.2.3.6, the capacity analysis results are not presented in an organized summary table within the report and instead use multiple tables in Appendix F. Without a clearly organized table it is difficult to compare results and the effects from different scenarios and model years. Recommend combining and reorganizing the tables in Appendix F into a summary table in the main report section. Also recommend showing results for queues and even using color to help identify trouble areas.

There is a separate Level of Service table for each peak hour studied included in the appendices. Each table includes a separate column for existing conditions, background conditions, build conditions, and build conditions with mitigation to allow for a direct side by side comparison of operations under each scenario. The queue tables include the side by side scenarios as well, along with a separate column that shows available storage.

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Former Shoppingtown Mall – Town of DeWitt, NY**

12. *Were the capacity analysis results in Appendix F performed per HDM 5.2.3.6 by reporting results using SimTraffic?*

The results are reported using Synchro as required by NYSDOT.

13. *Analysis results for existing travel speeds are included in the main report section, but what are they under the proposed conditions? HDM Chapter 5-17, specifies how essential travel speeds are for congested areas and it helping to properly report results.*

The existing travel speeds are based on operating speed data that was collected. Arterial measures of effectiveness which would include average operating speeds with delay included can be provided from the Synchro analysis. These will be prepared when the study is revised to address NYSDOT comments.

14. *Mitigation measures typically do not include detailed timing adjustments. Per HDM 5-15, the models should have signals optimized. Instead, the recommended mitigation would include items such as signal coordination, intersection lane adjustments, intersection control type (stop, signal, roundabout), corridor widening/reduction, driveway access, interchanges and ramps, bike lanes/sidewalks access, transit stops, etc.*

The timing adjustments are noted in the mitigation section to assist NYSDOT in potential signal optimization. Timing adjustments and optimization are completed by the agencies that have jurisdiction of the signals as routine maintenance. Specific recommended intersection modifications are noted at the Erie Boulevard / Grenfell Road/Site Access intersection. There are no other mitigation items recommended.

15. *Page 13 of the TIS, with the signal timing mitigation only that was described, the report states that Erie Blvd / E Genesee St is still a LOS E for PM peak, and further mitigation would be needed. Please describe the mitigation being referenced.*

The report notes the drop in Level of Service at this location. Mitigation, if necessary, will be determined after NYSDOT completes their review as they have jurisdiction over the intersection. NYSDOT is currently planning to field test the recommended signal timing adjustments and will then make a determination on whether any additional mitigation measures are required.

16. *Preliminary review of existing data inputs shows several discrepancies. The traffic count data in Appendix H does not match Traffic Figures in Appendix C or Synchro outputs in Appendix I. Example reference intersection is Erie Blvd / Kinne Rd, northbound thru shows 420 in count section, but 448 in synchro report and Figure 1. Southbound left shows 51 in count section, but 41 for synchro report and Figure 1. Note, the report states no seasonal correctional factor was applied.*

The traffic count data is the raw count data that was collected. Minor adjustments were made in the traffic volume figures to balance the traffic volumes between the study area intersections. The balanced traffic volumes in the figures were used in the analysis.

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17. Crash analysis was performed with some locations being above statewide averages. What are the recommended crash reduction measures?

There were two locations with more than 10 accidents over the past three years, Erie Boulevard at Kinne Road (28 accidents) and Erie Boulevard at Genesee Street (25 accidents). The predominant accident pattern at both of these locations were rear-end accident and overtaking accidents. Any required mitigation pertaining to accident history will be identified once we have NYSDOT comments.

There were no distinct accident patterns identified at the other intersections with accidents rates over the statewide average including the intersections of Genesee Street with Pickwick Road (9 accidents), Kinne Road with Butternut Drive (7 accidents), Kinne Road with Widewaters Parkway (5 accidents) or Agway Drive with Towpath Road (1 accident). No accident reduction measures are recommended.

Updated Trip Generation Estimate

A revised trip generation estimate has been prepared based on discussions with NYSDOT and comments from JMT. The following revisions have been made land uses:

- Retail square footage updated from 247,212 SF to 200,674 SF
- Medical Office square footage updated from 272,283 SF to 314,283 SF
- General Office space removed
- Supermarket space was added – 46,538 SF
- Educational/Institutional square footage was not changed
- Movie Theater square footage was not changed
- Apartment count was updated from 278 units to 314 units
- Townhouse/Condominium count was updated from 226 units to 190 units

The following adjustments to the assumptions and calculations were made in the estimate:

- A 20% reduction factor was applied to the movie theater trip generation rates given that the rates are based on data from the 1980's through 2010's. After reviewing numerous articles online, everything indicates the movie theater patronage has dropped significantly between 2010-2020 (Pre Covid) with the growth in streaming media at home and reductions in seating capacity with the recliner seating. The 20% is a conservatively low reduction as the rates are likely much lower.
- The Saturday rate for the Land Use 760 was corrected.
- The movie theater trips were removed from the pass-by trip calculations.
- The multi-use/transit credit was increased from 10% to 15% with the supermarket now being on the site.

With the revisions to the estimate, the new trip estimates during the morning peak hour increased by approximately 28 trips entering/24 trips exiting, the new trip estimates during the evening peak hour increased by approximately 51 trips entering/104 trips exiting, and the new trips estimates during the Saturday peak hour decreased by approximately 5 trips entering and increased by approximately 5 trips exiting.

The revised trip generation estimate has been attached.



Mr. O'Brien
November 29, 2022
Page 6 of 6

**Re: Response to JMT 11-8-2022 Traffic Study Comments – Proposed District East Development
Former Shoppingtown Mall – Town of DeWitt, NY**

If you have any questions or need additional information, please call.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. T. Stansbury', is written over the printed name and title.

Gordon T. Stansbury, P.E., P.T.O.E.
GTS Consulting

Attachment – Revised Trip Generation Estimate

**Proposed District East Development - Former Shoppingtown Mall
Town of DeWitt, NY
Trip Generation Estimate**

| | |
|----------------------|---|
| Previous Development | 1,189,958 SF - Shopping Mall (Including Movie Theater - 46,954 SF & Outparcels - 33,285 SF) |
| Proposed Development | 200,674 SF - Retail 314,283 SF - Medical Office 46,538 SF - Supermarket 112,836 SF Educational/Institutional 53,220 SF - Movie Theater 314 Units - Apartments 190 Units - Townhouses / Condominiums |

ITE Trip Generation - 11th Edition

Land Use 820 - Shopping Center (>150K) - Use for Retail & Previous Mall

| | | | |
|--------------------|---------------------|-----------|----------|
| Morning Peak Hour | 0.84 Trips/1,000 SF | 62% Enter | 38% Exit |
| Evening Peak Hour | 3.40 Trips/1,000 SF | 48% Enter | 52% Exit |
| Saturday Peak Hour | 4.40 Trips/1,000 SF | 52% Enter | 48% Exit |

Land Use 720 - Medical-Dental Office Building - Use for Medical Office

| | | | |
|--------------------|---------------------|-----------|----------|
| Morning Peak Hour | 3.10 Trips/1,000 SF | 79% Enter | 21% Exit |
| Evening Peak Hour | 3.93 Trips/1,000 SF | 30% Enter | 70% Exit |
| Saturday Peak Hour | 3.02 Trips/1,000 SF | 57% Enter | 43% Exit |

Land Use 850 - Supermarket - Use for Supermarket

| | | | |
|--------------------|----------------------|-----------|----------|
| Morning Peak Hour | 2.86 Trips/1,000 SF | 59% Enter | 41% Exit |
| Evening Peak Hour | 8.95 Trips/1,000 SF | 50% Enter | 50% Exit |
| Saturday Peak Hour | 10.10 Trips/1,000 SF | 50% Enter | 50% Exit |

Land Use 760 - Research & Development Center - Use for Educational / Institutional

| | | | |
|--------------------|---------------------|-----------|----------|
| Morning Peak Hour | 1.03 Trips/1,000 SF | 82% Enter | 18% Exit |
| Evening Peak Hour | 0.98 Trips/1,000 SF | 16% Enter | 84% Exit |
| Saturday Peak Hour | 0.24 Trips/1,000 SF | 50% Enter | 50% Exit |

Land Use 445 - Movie Theater - Use for Movie Theater

| | | | |
|---------------------|----------------------|-----------|----------|
| Morning Peak Hour** | 0.00 Trips/1,000 SF | 50% Enter | 50% Exit |
| Evening Peak Hour | 6.17 Trips/1,000 SF | 94% Enter | 6% Exit |
| Saturday Peak Hour | 17.91 Trips/1,000 SF | 53% Enter | 47% Exit |

** - Not open during morning peak commuter hour

Movie Theater data from the 1980's-2010's, does not account for trends from movie theaters to streaming services, or reduced seating capacities of theaters. Assume a 20% reduction in trip.

Land Use 221 - Multifamily Housing (Mid-Rise) - Use for Apartments

| | | | |
|--------------------|-----------------|------------|-----------|
| Morning Peak Hour | 0.37 Trips/Unit | 23% Enter | 77% Exit |
| Evening Peak Hour | 0.39 Trips/Unit | 61% Enter | 39% Exit |
| Saturday Peak Hour | 0.39 Trips/Unit | 51% Enter* | 49% Exit* |

Land Use 215 - Single-Family Attached Housing - Use for Townhouses / Condominiums

| | | | |
|--------------------|-----------------|-----------|----------|
| Morning Peak Hour | 0.48 Trips/Home | 31% Enter | 69% Exit |
| Evening Peak Hour | 0.57 Trips/Home | 57% Enter | 43% Exit |
| Saturday Peak Hour | 0.57 Trips/Home | 48% Enter | 52% Exit |

Assume a 15% Multi-Use Trip/Transit Trip Credit

Pass-by Credits - ITE Trip Generation Handbook, 3rd Edition

Land Use 820 - PM - 34%, Sat - 26%, Assume AM - 10%
Land Use 850 - PM - 36%

Assume Pass-by Credit Applies to Commercial Uses - Retail & Supermarket - Use - PM - 34%, Sat - 26%, AM - 10%
Applied after multi-use/transit credit to avoid compounding results

Trip Generation Estimate - District East Development

| Development | Size | Morning Peak Hour | | | Evening Peak Hour | | | Saturday Peak Hour | | |
|---|------------|-------------------|-------------|------------|-------------------|-------------|-------------|--------------------|-------------|-------------|
| | | Total Trips | Entering | Exiting | Total Trips | Entering | Exiting | Total Trips | Entering | Exiting |
| Retail | 200,674 SF | 169 | 105 | 64 | 682 | 326 | 355 | 883 | 459 | 424 |
| Medical Office | 314,283 SF | 974 | 769 | 205 | 1235 | 371 | 864 | 949 | 541 | 408 |
| Supermarket | 46,538 SF | 133 | 78 | 55 | 417 | 209 | 208 | 470 | 235 | 235 |
| Educational | 112,836 SF | 116 | 95 | 21 | 111 | 18 | 93 | 27 | 14 | 13 |
| Movie Theater | 53,220 SF | 0 | 0 | 0 | 263 | 246 | 16 | 763 | 405 | 358 |
| Apartments | 314 Units | 116 | 27 | 89 | 122 | 74 | 48 | 122 | 62 | 60 |
| Townhouses / Condos | 190 Units | 91 | 28 | 63 | 108 | 63 | 47 | 108 | 52 | 56 |
| Total Trips Generated | | 1599 | 1102 | 497 | 2938 | 1307 | 1631 | 3322 | 1768 | 1554 |
| Multi Use / Transit Credit - 15% | | -240 | -165 | -75 | -441 | -196 | -245 | -498 | -265 | -233 |
| Total Vehicular Trips Generated | | 1359 | 937 | 422 | 2497 | 1111 | 1386 | 2824 | 1503 | 1321 |
| Commercial Pass-by Credit | | | | | | | | | | |
| AM - 10%, PM - 34%, Sat - 26% | | -26 | -13 | -13 | -318 | -159 | -159 | -298 | -149 | -149 |
| Total New Trips Generated | | 1333 | 924 | 409 | 2179 | 952 | 1227 | 2526 | 1354 | 1172 |

Trip Generation Estimate - Previous Shoppingtown Mall

| Development | Size | Morning Peak Hour | | | Evening Peak Hour | | | Saturday Peak Hour | | |
|-------------|--------------|-------------------|----------|---------|-------------------|----------|---------|--------------------|----------|---------|
| | | Total Trips | Entering | Exiting | Total Trips | Entering | Exiting | Total Trips | Entering | Exiting |
| Retail | 1,189,958 SF | 1000 | 620 | 380 | 4046 | 1942 | 2104 | 5236 | 2723 | 2513 |