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July 15, 2010

Jeffrey H. Newman - BBSF LLC
c/o Malkin Properties, Inc.
One Station Place
Stamford, Connecticut 06902

Re: Gateway, Mani S. Poola, Memo to Land Use Bureau, July 12, 2010
Stamford, Connecticut
Comments

Dear Jeff:

As requested, DLS Consulting has reviewed the above referenced memo regarding Gateway. The memo comments on traffic studies by BLT, Malkin and Pitney Bowes and the impact of Gateway on the traffic in the South End. The following comments are offered.

The second paragraph of the Poola memo states that the background traffic for the developments in the south end will not take place all at once, but rather over 10-15 years, and therefore the projected traffic issues will not confront the City immediately, but over time. *There is no limitation on any already approved development in the south end, so the represents nothing more than an assumption. It is always possible that all the development may be concluded over the next few years, not over the next 10-15 years.*

The second paragraph of the Poola memo assumes that the Atlantic Street underpass will be improved within 10 to 15 years to address concerns on Atlantic Street at North and South State Streets. *The Atlantic Street underpass is a large scale project that will certainly not be complete within the next 5 years and may well take more than 10 to 15 years to complete. Prior to and during this improvement Atlantic Street at North and South State Streets will continue to operate over capacity with long queues and delays, and the Gateway project will exacerbate the overcapacity and queuing problems severely, especially during the years preceding completion of the Atlantic Street underpass improvement and completion of improvements to several other key intersections as well as the Greenwich Street underpass.*

In paragraph three, the memo indicates that the BLT conclusions about delays and severely impacted intersections are acceptable to the City for several reasons:

- The Poola memo indicates that peak hour traffic is spread over more than one hour with trips generated by the development distributed to more than one hour. *By definition, the peak hour occurs during a single hour and is not spread over several hours. The peak hour is the highest volume hour during the peak period. The peak period may be spread over several hours. It is also unrealistic to assume that there is no overlap between the timing of vehicle trips/parking for commercial office use and vehicle trips/parking for commuters.*
- The Gateway transit credit at 30% is acceptable to the City. *ConnDOT limits the transit credit for this project to 15%. Additionally, the BLT traffic study applies a 30% transit credit to six (6) previously approved developments despite the State Traffic Commission's approval and application of the standard, much lower, 15% transit credit to each of those approved projects, thereby resulting in an underestimate of background traffic and an overestimated reduction in vehicle trips associated with the proposed Gateway development.*

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- The memo assumes that the Atlantic Street at Henry Street intersection is improved. *There are no plans or time frame for this improvement.*

Problem Intersections (second page of the Poola memo)

Mani Poola's memo indicates that North and South State Streets at Washington Boulevard and Atlantic Street show increased delay due to site traffic and lack of storage space, and that the City's options at these intersections are limited to adjustment to signal timings only. *Adjustments from pedestrian-only to concurrent pedestrian-vehicular traffic signalization cycles may adversely impact pedestrian safety for thousands of employees of Royal Bank of Scotland for who this pedestrian-only cycle was installed. Adjustments to lane arrangements and lane widenings should also be considered, although any widening of the Washington Boulevard south of I-95 cannot increase capacity for trips north due to the current mis-alignment of the western side of Washington Boulevard with the Washington Boulevard underpass, as well as due to the fact that the perimeter of Metro Center's underground parking garage extends out to the street line on the eastern side of Washington Boulevard.*

Mani Poola's memo indicates that replacement of the old ConnDOT commuter parking garage will mitigate traffic delays and capacity problems, and that the addition of 500 commuter parking spaces at Gateway will also help alleviate queuing at the old ConnDOT commuter parking garage. *But it has not yet been determined when the ConnDOT garage will be replaced or whether the existing spaces in that garage will be replaced at the same location. Meanwhile, the development of Gateway would not alleviate congestion. Rather, queuing related to commuter traffic will be relocated to Washington Boulevard while queuing at the train station will remain.*

Mani Poola's memo suggests that new parking can help resolve some of the queuing related to dropping off and picking up and passengers, in concert with better traffic rule enforcement. *There is no planning or protocol suggested for new operation of the Transportation Center, no new rules or regulations to suggest a measurable step or series of steps to accomplish any such result.*

Additional Traffic Study? (second page of the Poola memo)

Mani Poola's memo acknowledges that North and South State Streets at Washington Boulevard and at Atlantic Street; Atlantic Street at Henry Street; and, Greenwich Avenue at Pulaski Street are all problem intersections. *Our latest Synchro modeling of the study area shows that the Greenwich Avenue at South State Street intersection is also a problem intersection, and the applicant's off site improvement plans do not adequately address these seven problem intersections.*

Mani Poola's memo indicates that the City has been working toward improving Atlantic Street at Henry Street (realignment) and Greenwich Avenue at Pulaski Street (rotary). *However, there are no plans, no time frame and no or incomplete funding for improvement of these intersections. In addition, Mani Poola has estimated the cost of realignment of the Atlantic and Henry Street intersection as between \$3.0 and \$3.5 million, and contributions currently sought from BLT and committed to by Malkin do not aggregate more than \$1.00 million.*

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The memo discusses various funding considerations for improvements to the Atlantic Street underpass. The funding discussed is not secured and is in the early planning and design stage. Timing for this improvement is not clear.

Harbor Point improvements are assumed to be in place prior to development of Gateway. Should any of the assumed improvements by Harbor Point in the Gateway study area not be completed prior to development at Gateway, BLT should be responsible for those improvements.

In summary, it is the opinion of Mani Poola, Stamford Traffic Engineer, that BLT has used reasonable assumptions in evaluating the traffic impact of Gateway. Malkin and Pitney Bowes have also used reasonable assumptions in their studies of Gateway. All three studies show six to seven problem intersections which will not be addressed prior to development at Gateway. A reduction in scale of parking and buildings (with the greatest reduction in parking/buildings for the commercial/office component of the project) would reduce impacts at the problem intersections. Other improvements at these intersections are longer term and will not be in place in time to address immediate needs

We trust that the above comments will be useful in your review of the Gateway project. We appreciate having been of service to you on this project. Should you have any questions concerning this letter, please feel free to contact this office.

Very truly yours,
DLS Traffic



David L. Spear, P.E.
Principal