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EPA Proposes Stronger Standards for Heavy-Duty Vehicles to Promote Clean Air, Protect Communities, and Support Transition to Zero-Emissions Future

March 7, 2022

Contact Information

EPA Press Office (press@epa.gov)

WASHINGTON (March 7, 2022) –Today the U.S. Environmental Protection Agency (EPA) is proposing new, stronger standards to promote clean air and reduce pollution from heavy-duty vehicles and engines starting in model year (MY) 2027. The proposed standards would reduce emissions of smog- and soot-forming nitrogen oxides (NO_x) from heavy-duty gasoline and diesel engines and set updated greenhouse gas (GHG) standards for certain commercial vehicle categories. This proposed rule would ensure the heavy-duty vehicles and engines that drive American commerce and connect people across the country are as clean as possible while charting a path to advance zero-emission vehicles in the heavy-duty fleet.



“Seventy-two million people are estimated to live near truck freight routes in America, and they are more likely to be people of color and those with lower incomes. These overburdened communities are directly exposed to pollution that causes respiratory and cardiovascular problems, among other serious and costly health effects,” **said EPA Administrator Michael S. Regan**. “These new standards will drastically cut dangerous pollution by harnessing recent advancements in vehicle technologies from across the trucking industry as it advances toward a zero-emissions transportation future.”

Consistent with President Biden’s Executive Order, “Strengthening American Leadership in Clean Cars and Trucks,” the proposed action would reduce NOx emissions from trucks by as much as 60 percent in 2045. It would result in widespread air quality improvements across the United States, especially in areas already overburdened by air pollution and diesel emissions. The benefits of the proposed rule would exceed its costs by billions of dollars. EPA estimates that by 2045 the most ambitious option outlined in today’s proposal would result in the following annual benefits:

- Up to 2,100 fewer premature deaths
- 6,700 fewer hospital admissions and emergency department visits
- 18,000 fewer cases of asthma onset in children
- 3.1 million fewer cases of asthma symptoms and allergic rhinitis symptoms
- 78,000 fewer lost days of work
- 1.1 million fewer lost school days for children

Today’s action is the first step in EPA’s “Clean Trucks Plan” – a series of clean air and climate regulations that the agency will develop over the next three years to reduce pollution from trucks and buses and to advance the transition to a zero-emissions transportation future.

EPA’s goal is to deliver significant and needed public health benefits by designing a program that sets ambitious standards and that are feasible for the trucking industry after giving appropriate consideration to cost and other factors, while supporting the American economy. To accomplish this, EPA has engaged with stakeholders and identified several options in the proposal that address the robustness of the standards, timing for phasing in the standards, options to incentivize early clean technology

adoption, and improvements to emissions warranties. EPA is seeking input on these options and looking forward to continuing engagement through the public comment process.

The proposed revisions to existing GHG standards for MY2027 and beyond would set updated GHG emissions standards for subsectors where electrification is advancing at a more rapid pace. These sectors include school buses, transit buses, commercial delivery trucks, and short-haul tractors. In a separate action, EPA will be setting new GHG emissions standards for heavy-duty vehicles as soon as model year 2030. This action will more comprehensively address the long-term trend towards zero emissions vehicles across the heavy-duty sector.

Today's proposal reflects input from stakeholders including community groups, manufacturers, and state, local, and tribal governments. EPA looks forward to hearing from all stakeholders involved in this important rulemaking. A public comment period and hearing will give stakeholders and the public an opportunity to comment on the proposal announced today and we look forward to engaging through this process.

For more information on the rule on the public comment process, please visit:
<https://www.epa.gov/regulations-emissions-vehicles-and-engines/proposed-rule-and-related-materials-control-air-1> <<https://www.epa.gov/regulations-emissions-vehicles-and-engines/proposed-rule-and-related-materials-control-air-1>>

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EXHIBIT B

MEMORANDUM

TO: South Windsor Planning and Zoning Commission

FROM: James M. Connor, Esq.
Updike, Kelly & Spellacy, P.C.

RE: Limitations On Planning and Zoning Commission Review of Site Plan Applications

DATE: March 8, 2022

Site plan review is governed by Section 8-3 of the Connecticut General Statutes. C.G.S. § 8-3 (g) provides in relevant part: “The zoning regulations may require that a site plan be filed with the commission or other municipal agency or official to aid in determining the conformity of a proposed building, use or structure with specific provisions of such regulations. . . . A site plan may be modified or denied only if it fails to comply with requirements already set forth in the zoning or inland wetlands regulations. Approval of a site plan shall be presumed unless a decision to deny or modify it is rendered within the period specified in section 8-7d. . . . A decision to deny or modify a site plan shall set forth the reasons for such denial or modification. . . . The provisions of this subsection shall apply to all zoning commissions or other final zoning authority of each municipality whether or not such municipality has adopted the provisions of this chapter or the charter of such municipality or special act establishing zoning in the municipality contains similar provisions.”

In ruling upon a site plan application, [a planning and zoning] commission acts in its ministerial capacity, rather than in its quasi-judicial or legislative capacity. It is given no independent discretion beyond determining whether the plan complies with the applicable regulations The [commission] is under a mandate to apply the requirements of the regulations as written. If the plan submitted conforms to these regulations, the [commission] has no discretion or choice but to approve it Every property owner is entitled to rely on the local zoning regulations and to use his property accordingly.” (Citations omitted; internal quotation marks omitted.)

Updike, Kelly & Spellacy, P.C.

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Allied Plywood v. Planning and Zoning Com. of So. Windsor, 2 Conn. App. 506, 512, *cert. den.*, 194 Conn. 808 (1984).

Zoning regulations specify the uses permitted within each zoning district. “The designation of a particular use of property as a permitted use establishes a conclusive presumption that such use does not adversely affect the district and precludes further inquiry into its effect on traffic, municipal services, property values, or the general harmony of the district.” (Internal quotation marks omitted.) Pansy Road, LLC v. Town Plan & Zoning Com. of Fairfield, 283 Conn. 369, 376 (2007) (in considering subdivision application that complies with all zoning regulations, commission cannot consider effect of subdivision on existing traffic congestion on town roads).

With respect to the impact of traffic emanating from a permitted use, “a land use agency cannot deny an application for a permitted use because of off-site traffic considerations.” Bethlehem Christian Fellowship, Inc. v. Planning & Zoning Com. of Bethlehem, 73 Conn. App. 442, 470 (2002), citing TLC Development, Inc. v. Planning & Zoning Com. of Branford, 215 Conn. 527, 532-33, (1990); Sowin Associates v. Planning & Zoning Com. of So. Windsor, 23 Conn. App. 370, 374, 375, *cert. den.*, 216 Conn. 832 (1990); Beit Havurah v. Zoning Bd. of Appeals of Norfolk, 418 A.2d 82, 177 Conn. 440, 443 (1979) (“The designation of a particular use of property as a permitted use establishes a conclusive presumption that such use does not adversely affect the district and precludes further inquiry into its effect on traffic, municipal services, property values, or the general harmony of the district.”) It follows that a land use agency may not impose conditions of approval on a site plan intended to address off-site traffic considerations.

The court in Pansy Road, LLC reiterated and clarified prior holdings in Friedman v. Planning & Zoning Com. of Rocky Hill, 222 Conn. 262 (1992), and Sowin Associates, *supra*, stating that “traffic considerations can play only a limited role in the review of subdivision and site plan applications.” Pansy Road, LLC, *supra*, 283 Conn. at 379. The court explained that this limited role could include addressing traffic flow within the site and placement of entrances and exits from the site but could not provide a basis for denial of an application. *Id.*, 380.

The authority of the South Windsor Planning and Zoning Commission relating to traffic issues in its review of site plan applications is set forth in the South Windsor Zoning Regulations. Section 4.1.5 of the Regulations, entitled “Traffic Requirements” provides as follows:

4.1.5 Traffic Requirements To provide for the orderly flow of inbound and outbound site generated traffic, and to minimize the inherent conflicts between outbound left and inbound left maneuvers, applicants must demonstrate to the Commission’s satisfaction that the site generated traffic is able to enter and exit the site safely without disruption to the external traffic flow. On-site queuing provisions must be adequate to prevent site generated traffic from queuing on public streets. Sight lines for the existing traffic from the site drive must be satisfactory for the prevailing speed of approaching traffic. The applicant must demonstrate that the design provides for safe and orderly vehicular and

pedestrian flow and movement of traffic and minimizes vehicular and pedestrian conflicts. Delivery areas must be located so that normal operations are not impeded or compromised. An engineered traffic report must be provided with the application to demonstrate the adequacy of traffic flow and design.

South Windsor Zoning Regulations, Section 4.1.5. Similarly, Section 6.1.5 provides as follows:

6.1.5 Traffic and Circulation Considerations To assure the smooth flow of traffic to and from sites and to minimize conflicts between pedestrians and motor vehicles, Site Plan design should incorporate the following: 1. On-site queuing provisions must be adequate to prevent site-generated traffic from queuing onto public streets. 2. Sight lines for exiting traffic from the site drive must be satisfactory for the prevailing speed of approaching traffic. 3. The applicant must demonstrate that the design provides for safe and orderly vehicular and pedestrian flow and movement of traffic and minimizes vehicular and pedestrian conflicts. 4. Delivery areas must be located so that normal business operations are not impeded or compromised. A traffic report prepared by a professional engineer shall be provided with the application to demonstrate the adequacy of traffic flow and design. This report may be waived where the site-generated traffic is minimal and the Town Engineer concurs that the traffic layout is acceptable.

South Windsor Zoning Regulations, Section 6.1.5.

The authority of the South Windsor Planning and Zoning Commission is limited by these criteria. If a site plan application conforms to the regulations, the commission has no choice but to approve it. Pansy Road, LLC, supra, 283 Conn. at 374. The South Windsor Zoning Regulations do not give the Commission authority to regulate or restrict access to off-site streets by vehicles arriving at or departing from a permitted use in the zone or to require the owner of a permitted use to construct improvements to those off-site streets.

The property in the application is zoned I - Industrial, and warehouse and distribution center use is a permitted use in the zone. See South Windsor Zoning Regulations § Section 4.1.1 Permitted Uses. Because it is a permitted use, there is a conclusive presumption “that this proposed use does not adversely affect traffic within the zone, and the [Commission] therefore cannot deny the application because of existing off-site traffic congestion.” Pansy Road, LLC, supra, 283 Conn. at 379. As stated in Pansy Road, “the agency cannot turn down a site plan [or subdivision application] because of traffic problems on streets adjacent to the property.’ R. Fuller, 9B CONNECTICUT PRACTICE SERIES: LAND USE LAW AND PRACTICE (3d Ed. 2007) § 49.14, p. 139.” Pansy Road, LLC, supra, 283 Conn. at 379-80.¹ The South Windsor Planning and Zoning Commission has no authority to regulate access to and from a permitted use.

¹ The quoted language is in the current edition of the cited treatise in R. Fuller, 9B CONNECTICUT PRACTICE SERIES: LAND USE LAW AND PRACTICE (4th Ed.) § 49.18.



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EXHIBIT C

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**25 Talbot Lane Warehouse & Distribution Center
Summary of Site Plan Changes
Planning & Zoning Commission Site Plan Application**

5 & 25 Talbot Lane and 475 & 551 Governor's Highway

South Windsor, Connecticut

Application 22-01P

DPI Project No. 1976.U

March 8, 2022

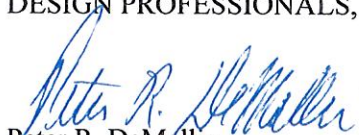
The following summarizes the changes made to the above-mentioned site plan set with a revision date of 3/2/2022 in response to Town Staff comments and comments at the hearing on February 15, 2022:

1. The radius on the outbound lane on the Talbot Lane driveway has been improved to allow for an entering and exiting tractor trailer to utilize the driveway simultaneously without conflict and without centerline encroachment.
2. The drive aisle in the Tractor trailer queuing lot has been widened by 5 feet to better accommodate vehicle maneuvers.
3. The northern section of trailer spaces was consolidated.
4. Three trailer spaces were removed from the southern end.
5. 'Reserve Parking' spaces were moved from the north side of the northern emergency access drive to the southern emergency access drive.
6. A five feet wide sidewalk was added to connect the main building entrance to Governor's Highway.
7. Potential snow storage areas are labeled on the Landscape Plans.
8. Street trees along Talbot Lane were shifted to the north to accommodate the revised tractor-trailer entrance.
9. One light pole was shifted to accommodate the revised tractor-trailer entrance.

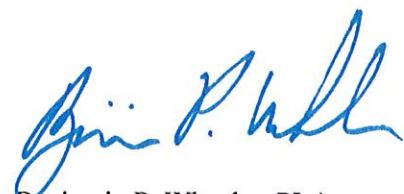
The following summarizes the changes made to the above-mentioned site plan set with a revision date of 3/8/2022 in response to a Town Staff comment and review of the previous site plan set:

1. The snow storage area at the southern end of the trailer parking spaces was removed per the request of Jeff Folger, Town of South Windsor Senior Environmental Planner.
2. One of the 'reserve parking' spaces on the north side of the building was designated as a Van Accessible parking space.

Respectfully submitted,
DESIGN PROFESSIONALS, INC.


Peter R. DeMallie
President


Daniel H. Jameson, P.E.
Civil Engineer
Project Manager


Benjamin P. Wheeler, PLA
Landscape Architect
Director of Operations &
Landscape Architecture



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EXHIBIT D

CIVIL & TRAFFIC ENGINEERS / LAND SURVEYORS / PLANNERS / LANDSCAPE ARCHITECTS

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March 08, 2022

Mr. Bart Pacekonis, Chairman
Town of South Windsor
Planning & Zoning Commission
1540 Sullivan Avenue
South Windsor, CT 06074

Re: 25 Talbot Lane
Warehouse & Distribution Center
5 & 25 Talbot Lane and 475 & 551 Governors Highway
South Windsor, Connecticut

DPI Proj. No.: 1976.U

Dear Mr. Pacekonis:

This letter addresses comments and concerns relating to property boundaries and easements made at the public hearing for the above referenced project.

Property Boundary:

Design Professionals, Inc. was hired to provide a property boundary survey for the proposed project referenced above. The total property boundary as depicted on the submitted Property & Topographic Survey accurately depicts the total combined property boundaries.

This project is comprised of 4 contiguous properties known as 5 & 25 Talbot Lane and 475 & 551 Governors Highway. The exterior boundary of the 4 properties are the surveyed limits for this project and meet the accuracies of a Class A-2 Property Survey as defined in: "Standards and Suggested Methods and Procedures for Surveys and Maps in the State of Connecticut Prepared and Adopted by the Connecticut Association of Land Surveyors, Inc. August 29, 2019". The interior property lines are Class D property lines as defined in the above referenced standards. We have adjusted the interior line of 475 Governors Highway to the correct location as defined in Volume 2852 on Page 251 of the Town of South Windsor Land Records included with the latest submitted site plans. This change did not affect the overall project boundary and therefore has no impact on the feasibility of the project as depicted on the site plans.

Newberry Road Abandonment/Discontinuance: Newberry Road was discontinued by the South Windsor Town Council on June 2, 1986, and the limits of the abandonment/discontinuance are depicted on a plan entitled: "Key Map Parkcenter Development Plan Prepared for Savin Bros. Inc. So Windsor Conn January 1986 Scale 1"=200' By Palmberg & Russo", filed as Map No. 1639-B in the South Windsor Town Clerks Office.

Easements:

MDC Easement: The proposed Metropolitan District Commission (MDC) easement as recommended in the South Windsor Town Council Resolution to abandon/discontinue Newberry Road, item 10-b of the resolution authorized Richard Sartor (the Town Manager at that time) to execute a watermain easement with the MDC. As part of the land records research required to certify a Class A-2 Property Survey we reviewed the indexes for all current and prior owners of the 4 properties for the relevant time period to identify all easements of record. To eliminate any doubt, we additionally researched the South Windsor land records for- any easement from the Town of South Windsor to the MDC from June 2, 1986, to present. Our research did not locate any such easement granted by any of those owners or by the Town to the MDC affecting any of the 4 properties.

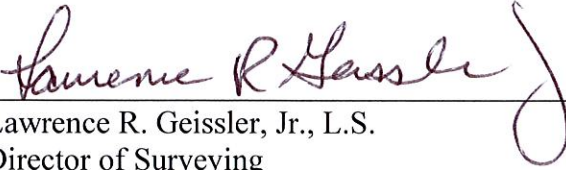
We contacted the MDC and requested information relative to the location of their watermains and easements in the vicinity of this project. They provided us mapping that depicts the location of a 12” watermain that was installed in Governors Highway that pass by the abandoned/discontinued Newberry Road. There is no indication of any watermain existing in the discontinued portion of Newberry Road or elsewhere on the 4 properties or of any recorded easement giving the MDC the right to install one in the future.

Town of South Windsor Street Tree Easement: An existing 25 foot easement along the frontage of 5 & 25 Talbot Lane, as defined in volume 1192, page 257 of the South Windsor Land Records was added to the survey plan. This easement allows the Town of South Windsor to plant and maintain street trees in the identified area and contains some restrictions such as signage but allows the owner to use the area for all other uses consistent with the easement. This change did not affect any improvements or landscaping shown on the site plans and therefore has no impact on the feasibility of the project or its full compliance with the South Windsor Zoning Regulations as depicted on the site plans.

There are no other easements on the property other than already depicted on the survey. None of the easements shown will prevent construction of any improvements, the planting of any landscaping or otherwise adversely impact the development of the plan.

Please feel free to contact me if you have any additional questions.

Sincerely,



Lawrence R. Geissler, Jr., L.S.
Director of Surveying





Lawrence R. Geissler, Jr., L.S.

Director of Surveying

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Mr. Geissler manages the survey department at DPI, including field crews, office technicians and GPS personnel, utilizing over 52 years of experience in the land surveying and mapping fields. He is responsible for reviewing and signing all survey maps as well as overseeing land record research and the collection of field data using robotic, conventional, GPS, and VRN survey techniques. He also supervises the preparation of base mapping for boundary, utilities, wetlands, topographic, ALTA, mortgage and as-built surveys, construction "stake-out", and geo-referencing GIS data to standard coordinate systems.

Throughout his career, Mr. Geissler has been responsible for many significant projects throughout southern New England including: using GPS for aerial photo control for the mapping of the Towns of Groton, Ledyard, Stonington, and Waterford, Connecticut covering nearly 180 square miles; GPS aerial photo control and mapping utility locations for the entire City of Cranston, RI; base mapping and construction stake-out for the Evergreen Walk lifestyle retail center (South Windsor, CT) and the Buckland Hills Mall (Manchester, CT); mapping and monumentation of the I-84 corridor in Manchester, CT; and continuing to maintain an on-call land surveying contract with the U.S. Fish & Wildlife Service in the states of Connecticut, Massachusetts and Rhode Island since 1993, including using GPS for aerial photo control for the mapping of the Monomoy Island National Wildlife Refuge in Chatham, Massachusetts, among many other projects, preparation of easement mapping for the NRCS in conjunction with Tetra Tech on parcels ranging from a few acres to a parcel containing approximately 200 acres in the towns of Old Lyme, Madison, Branford, and West Haven, CT. We also prepared easement mapping for The Nature Conservancy, NRCS, Fannie Stebbins Memorial Wildlife Refuge and the U.S. Fish and Wildlife Service of parcels totaling over 220± acres in Longmeadow, Massachusetts.

Mr. Geissler was instrumental in the development of Connecticut's first Certificate program in Land Surveying at Charter Oak State College in New Britain, which began in 2008. He is a licensed land surveyor in the states of Connecticut and Rhode Island and the Commonwealth of Massachusetts.

EDUCATION:

- Associate in Forestry/Land Surveying, Paul Smith College

PROFESSIONAL LICENSING:

- Registered Land Surveyor, State of Connecticut (No. 12327)
- Registered Land Surveyor, Commonwealth of Massachusetts (No. 35028)
- Registered Land Surveyor, State of Rhode Island (No. 1905)

PROFESSIONAL MEMBERSHIPS AND ASSOCIATIONS:

- Firm Member, Connecticut Association of Land Surveyors (C.A.L.S.)
- Tolland County Director, Connecticut Association of Land Surveyors (C.A.L.S.)

- Member, National Society of Professional Surveyors (NSPS)

AWARDS

- Certificate of Appreciation for Dedication to the Profession of Land Surveying, Connecticut Association of Land Surveyors, for the development of a Certificate program in Land Surveying, Charter Oak State College (2007)

TEACHING EXPERIENCE:

- ACE Mentor Program, a program to mentor high school students interested in the Architecture, Construction Management, and Engineering fields. Hartford, Connecticut (2008–present)

EXPERIENCE:

- **Director of Surveying**– Design Professionals, Inc., South Windsor, Connecticut.
Tenure: March 2006 to present.
- **Chief of Survey/Associate** – Fuss & O’Neill, Manchester, Connecticut.
Assumed the Chief of Survey position in 1984. Responsible for overseeing the entire survey department, including as many as 6 field crews and 8 technicians, and reviewing and signing all survey maps for projects completed in Connecticut, Massachusetts and Rhode Island. Mr. Geissler brought Global Positioning System (GPS) surveying technology to Fuss & O’Neill. He was responsible for GPS control projects for Town-wide aerial mapping, including: Cranston, RI; Manchester, CT; New London, CT; Ledyard, CT Stonington, CT; & Groton, CT. Tenure: 1984 to March 2006.
- **Instrument Operator/Sr. Party Chief**– Fuss & O’Neill, Manchester, Connecticut
Mr. Geissler began his survey career upon graduation from Paul Smith College. He advanced to Senior Party Chief where he was responsible for the field work from small lot surveys to large projects such as the JC Penney Distribution Center in Manchester, CT. Tenure: 1969 to 1984.

EXHIBIT E

To: Mr. Bart Pacekonis

Chairman –Town of South Windsor Planning and Zoning Commission

Town of South Windsor

1540 Sullivan Ave.

South Windsor Ct. 06074

Re: 22-01p Additional detail and information for the South Windsor Planning and Zoning Commission for public input.

This application if approved will have adverse affects on public health and safety and uses a site plan not compatible with the area.

The 2/15 presentation mentioned and data provided in tables refer to the site being safe and providing orderly flow of a wb62 design vehicle. Majority of all road trucks today “highway design tractor trailers“, wb67 equipment is 5-8 ft longer. Please see exhibit A for review of wb62, and wb67 equipment. These units need a wider turn radius, and a longer swept path during turns as shown in the AASHTO exhibit for 90-180-degree turns, (American Association of Highway and Transportation Officials). See Exhibit B. Invalid statement of safe traffic flow as most trucks are wb67.

Wb62 units are generally 45’ to 48’ in length and are primarily only used in food service and commerce requiring smaller 45’ and 48’ overseas containers. Based on the applicants truck terminal article provided on 2/14/22, if food service, this application should immediately require “the terminal tag”. If the site is designed to support (wb62) trailers for overseas freight containers, this application should immediately require “the terminal tag”.

2/15 When reviewing the applicant’s plans the parking space at the dock is 60’ with a 70’ aisle and the parking lot across from the dock is 60’. Tractor trailer wb67 units are 73-75 ft. in length. This means a truck backed in at dock has up to a 15 ft. overhang into the main aisle. The truck parked in the adjacent 60’ truck parking space is also 75 ft. with a 15ft. overhang into the main aisle. The overhangs on both sides reduce the main aisle down from 70’ to 40’. Using the Brazhuman truck turn radius provided in Exhibits B, E, we find that a tractor trailer pulling out next to another unit needs more than 40’ to navigate the turn to get out of the dock. The main aisle is not large enough for orderly traffic flow with high volume and will lead to on site conflicts that will back up into the queuing area and the main entrance with overflow being in

the street. Please review Exhibit E, Overlay onto the site plan using AASHTO and Brazhuman models to scale.

ON SITE CONFLICT 6.1.5-1 and -3

Also the 40 parking spaces across from the dock set up as trailer parking spaces will require blind side back in. Again this is unsafe, takes too long, and in this industry we try to avoid. This too will become a pinch point. Usually drivers try to turn around to back in on the driver's side. What is drawn is not what happens in real life situations. **ONSITE CONFLICT 6.1.5-1 and -3**

I pulled data from a report from the Federal Highway Administration, The National Cooperative Highway Research Program Report 505, NCHRP Report 505 chapter 5 Truck characteristics.

The FHWA truck characteristics study 2-3 found and developed a data table in this research to confirm swept path widths (sway- I called it), for trucks wb62 and larger are so great that the truck can't make a 90 degree right turn from one lane of a two lane roadway to another while remaining within a 12' lane. Trucks making a 90 degree turn must encroach onto the shoulder or the roadway or curb line into the opposing lane and traffic.

This is highlighted in the Brazhuman analysis design vehicles and turning radii, (pages 8,18), provided in Exhibits B,F. With this proposed high volume site, trucks will be exiting and entering simultaneously. This means trucks will be operating into the opposing lane of traffic for 40 feet making turns in and off of Governors, from Talbot and in and out of the site. Please see the swept path, off tracking turning exhibit with site plan overlays Exhibits C,D,F, using AASHTO design of the intersections.

LANE TO LANE TURNING CONFLICT – all turns from Governors, Talbot, into the site and into the queuing area-CONFLICT 6.1.5-1 and 3

In the applicant's (Hesketh) report, the Multi Model queuing analysis was used.

During the last PZC meeting on 2/15 the applicant's representative made the statement that the trucks would not need to pre-trip inspect because they would not originate at the site. That is in conflict with The Gorman and York fiscal impact report provided by the applicant's team. In the table on page 3 of the report, they list the impact of the additional 108 new truck driving jobs the project will create. How could one add 108 driver jobs and not have trucks originate or terminate at the site? The pre-trip inspection has to be done for the all tractors and trailers even if the trailers are preloaded and dropped.

In the Feb. 8 letter to the chairman from the applicant (2nd page 5th paragraph), the applicant's representative remarked on how it is important to look at the potential queuing at the gate access. As quoted, "Although there are enough docks, the choke point could be in the initial gate access. As indicated above each truck needs to complete paperwork prior to entering the dock." It seems clear the applicant's team has an idea where the choke points will be.

Usually, the drivers check in when they arrive at a gate. I only know of one company that completes their check in by blue tooth and GPS.

Typically this takes longer than 5 minutes. The paperwork usually is not complete until the truck is unloaded. The freight has to be counted and verified by item. Inventory checked for OSD (overages, shortages, and damages) and then updated against what was purchased. If there are exceptions, and often there are, it can tie up the truck, and dock door for 20 min. after unloading.

The unload times projected do not account for the variety of real world situations that occur. This, in my opinion, makes the summation of the applicant's team incorrect.

In the review of their analysis, the applicant's representative, (page 2) of the Hesketh report, lists unload times that are the basis of the report that are not realistic. I agree, there are some truckloads we unload in 1 -2 hours. There are just as many truck loads that take 4-5 hours. Any trailer that is floor loaded rather than palletized, like overseas containers, even air freight pans, take 4-5 hours to strip and receive in. These loads take 4-5 hours to off load as every item has to be individually handled. The average is 4hrs. Based on my experience working in these operations for 40 years, I believe the times projected are not accurate.

Backlog from the site will spill over into the public road. The applicant's representative did not address the extra times needed for loading.

No times were included in the analysis for truck loading. Loading activity usually ties up almost half of the dock doors and up to half of the assets in labor and handling equipment. This makes the m/m queuing analysis invalid for this site. Typically many of the loading dock doors in our industry are tied up for packing, counting, comingling, loading outbound shipments. Why might important details be missing? Perhaps the applicant's team did not realize it would make the traffic flow projections invalid. The inbound off load ITE service parameters in the flow analysis the applicant's report used, therefore is not valid in my opinion. This type of situation tends to create delays at the dock that will lead to congestion at the site and spill over onto Talbot.

The applicant's team used the Poisson distribution model in their analysis. This model suggests 38 units in the site system at a time and 40 dock doors as sufficient to handle 100% of the inbound peak traffic. When we factor in an operation using potentially half of the site assets involved in loading outbound, it reduces dock door capacity in half. This would leave only 27 dock doors available for inbound. Actually only 25 available if 1 dock is reserved for trash and a dock reserved for cardboard as is common. With at least half of the inbound units arriving taking double the time to unload, and half of the assets involved with outbound, there can be 57 units on site by 10:30 in the a.m. This conflicts with the data used in the Poisson model used.

By 11a.m. to keep up with the inbound flow of 19 per hour, the site is already short by over 30 doors. In my professional opinion, we will have 4-5 queuing spaces unusable based on angles needed to navigate. This would indicate that twenty-five queuing spots could be filled by lunch time. When considering common operational activities, this site has the propensity to create, back-ups, pinch points and spill over that will lead onto Talbot Lane, based on the volume of site traffic projected in this site plan. Based on my experience, this indicates that the site is not large enough for the size of the operation projected.

Bulletins

We haven't even addressed the environmental impacts of 40 dock doors in operation 10 hours per day using 40 fork lifts with propane exhaust of carbon monoxide.

Back up alarms on trucks are not mentioned in any sound analysis. Environmental Health Perspective Journal Jan. 2011 volume 119 reports vehicle back up alarms are 97-112 db at the source.

ITE Report used by the applicant mentions 25% of truck traffic will exit the site @ Talbot turning right. That is 52 trucks per day to an already bad situation. None of the traffic study lists or reports outbound truck traffic heading east on Governors and using the intersection of Governors and Rte 30.

CONFLICT 6.1.5-1 and 3

In closing and most importantly, I have worked and still work in a multi function facility. The actual work of the site determines it's usage. We pack, sort, repack and provide short term storage in some areas, with trucking and terminal work being the main stay.

The applicant's site can have different functions as well, but having 54 dock doors and a volume of 209 trucks per day indicates the preponderance of the work will be loading, unloading, comingling, and consolidating freight in the form of LTL and TL truckloads

and containers. If any of the merchandise handled by the site is finished goods continuing on into the supply chain or delivering to consignees, it should be classified as a terminal. **Based on the applicant's truck terminal article provided on 2/15/22, if food service, this application should immediately require "the terminal tag". If the site is designed to support (wb62) trailers for overseas freight containers, this application should immediately require "the terminal tag".**

The NYU Rudin Center for Transportation Policy and Management produced a report for the NY DOT titled "Urban Distribution Centers A Means to Reduce Freight Miles Traveled". In A-4 page 48, "Integration with Logistics Networks", these new centers are referred to as consolidation (UDC's), or urban distribution centers, city terminals.

This is a high volume site with more truck trips than some of the freight terminals I've worked at.

In my opinion, this site plan appears to show the characteristics of a high yield multi-function operation with the primary characteristics required to support the work of a large trucking and freight transfer center with other functions as seems to be the current trend. This site is within 500 ft. from the neighborhood and should be classified as a terminal. It brings all of the hazards of a freight terminal to the neighborhood. In my opinion, by design this facility is not compatible to the area proposed.

Thank you for your time and consideration in this matter.

Respectfully submitted,



Derrick J. Butler

3/7/22

596 Governors Highway

Exhibit A

AASHTO wb62 highway design vehicle

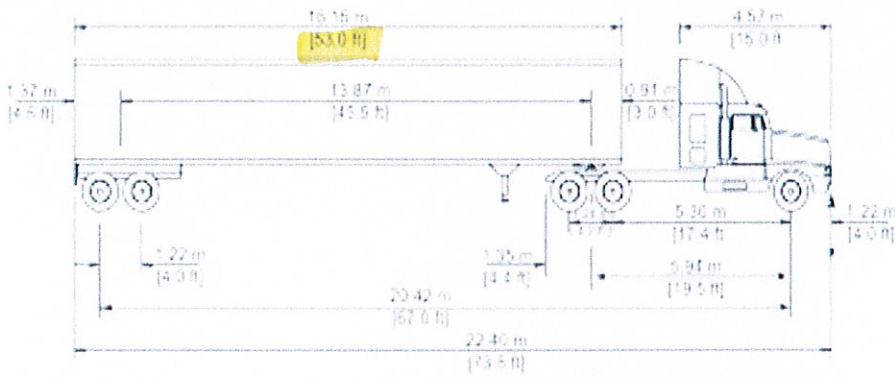
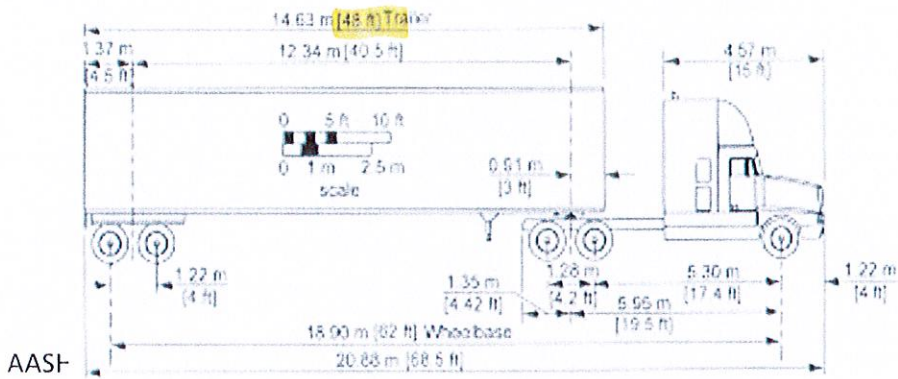


Exhibit B

Brazhuman Corp design vehicles and turning radii by Dr. Scott Washburn

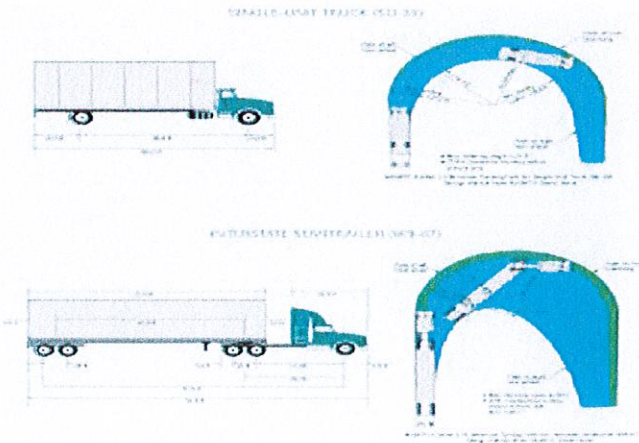
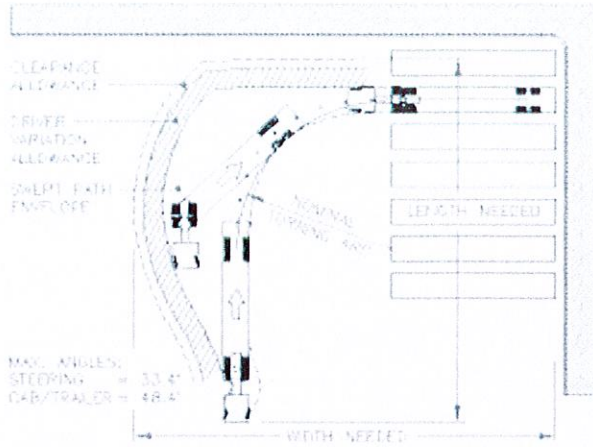
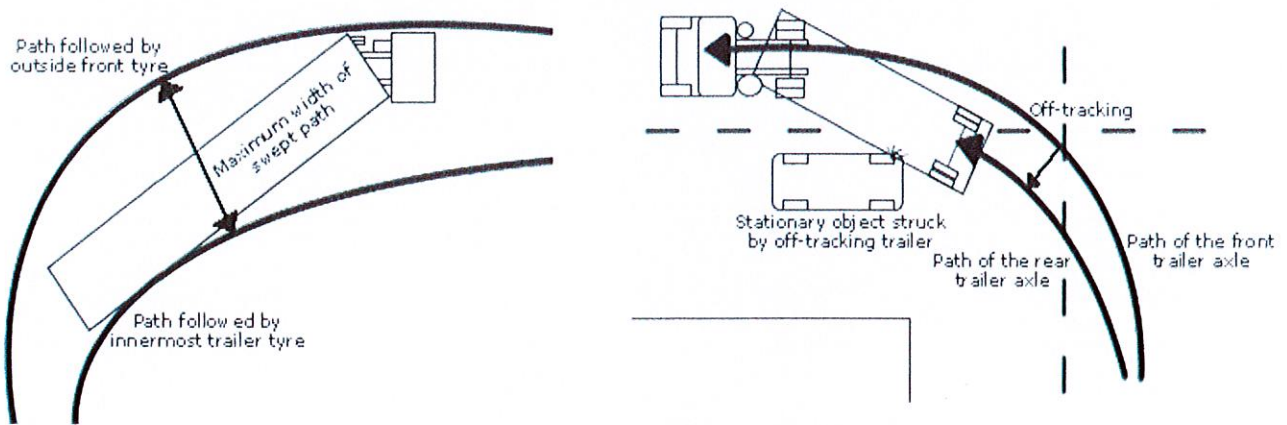


Exhibit C Swept Path & off tracking by Brazhuman Corp.



FRONT YARD

EX) D



MB-91

D

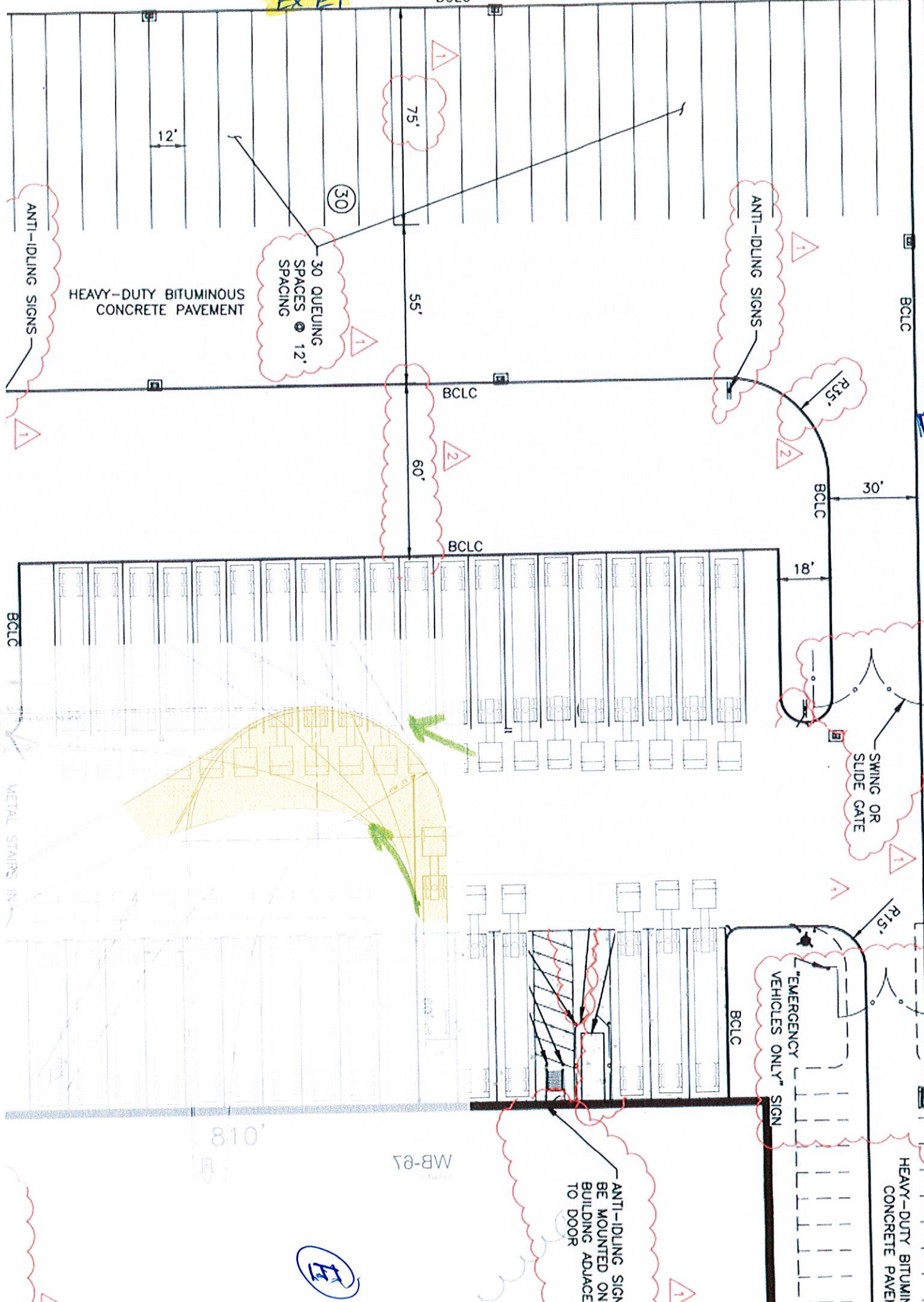
ANTI-IDLING
BE MOUNTED
TO BUILDING ADJ
TO DOOR

EMERGENCY
VEHICLES ONLY SIGN

HEAVY-DUTY BIT
CONCRETE P.

15' FRONT YARD

EX) E



EX

MB-93

810

ANTI-IDLING SIGN BE MOUNTED ON BUILDING ADJACE TO DOOR

"EMERGENCY VEHICLES ONLY" SIGN

SWING OR SLIDE GATE

HEAVY-DUTY BITUMINOUS CONCRETE PAVEMENT

30 QUEUING SPACES @ 12' SPACING

ANTI-IDLING SIGNS

ANTI-IDLING SIGNS

ANTI-IDLING SIGNS

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BCLC

BCLC

BCLC

BCLC

30'

18'

R35'

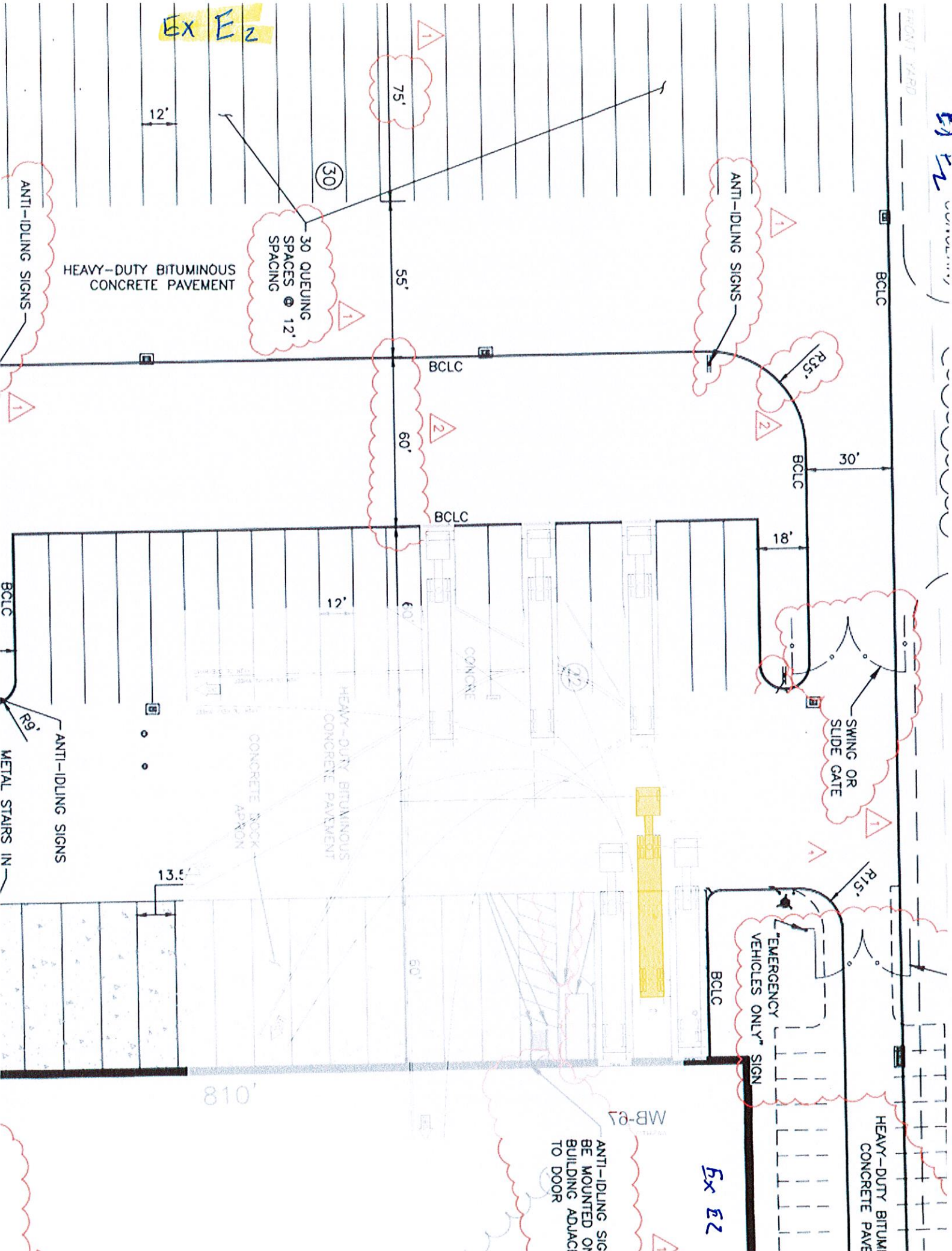
R15'

BCLC

BCLC

METAL STAIRS IN

Ex E2



Ex E2

Ex E2

ANTI-IDLING SIG BE MOUNTED ON BUILDING ADJACI TO DOOR

MB-01

810'

12'

75'

55'

60'

30

SWING OR SLIDE GATE

"EMERGENCY VEHICLES ONLY" SIGN

ANTI-IDLING SIGNS

ANTI-IDLING SIGNS

HEAVY-DUTY BITUMINOUS CONCRETE PAVEMENT

30 QUEUING SPACES @ 12' SPACING

ANTI-IDLING SIGNS

METAL STAIRS IN

HEAVY-DUTY BITUMINOUS CONCRETE PAVEMENT

BCLC

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FRONT YARD

30'

18'

BCLC

R15'

R35'

13.5'

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12'

60'

CONCRETE

HEAVY-DUTY BITUMINOUS CONCRETE PAVEMENT

CONCRETE DOCK APRON

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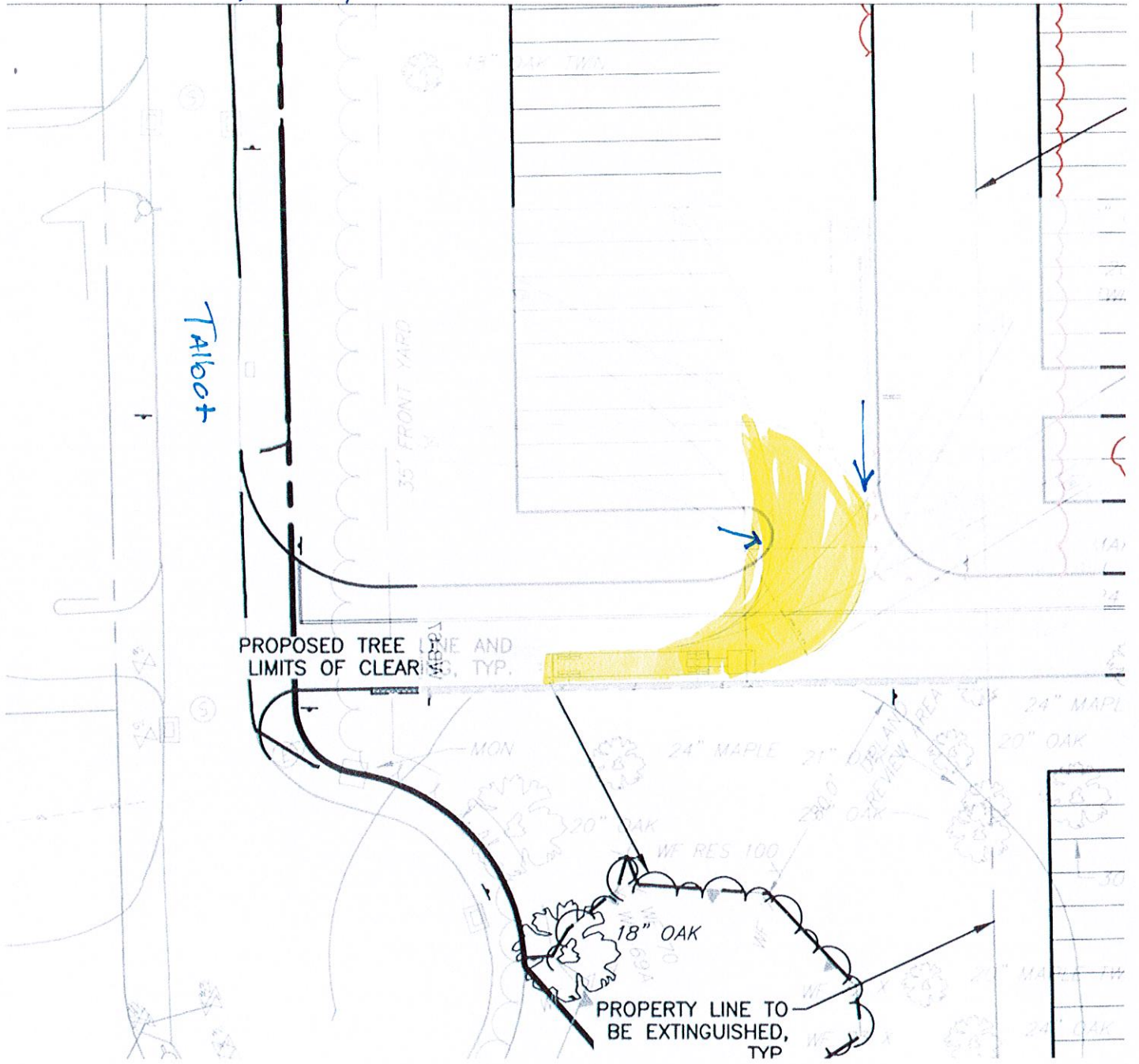
Ex F3



F3

Ex F4

Re: Truck radius overlay



F4

EXHIBIT F

Testimony on Traffic and Parking and Stormwater Drainage Application 22-01P

John Holowczak, B.S. Cer. Eng., M.S. Cer. Eng

Cody Circle, South Windsor

29 year S. Windsor resident

Sources Incorporated Herein by Reference

“HIGH-CUBE WAREHOUSE VEHICLE TRIP GENERATION ANALYSIS” PREPARED BY INSTITUTE OF TRANSPORTATION ENGINEERS WASHINGTON, D.C., OCTOBER 2016

<https://www.ite.org/pub/?id=a3e6679a%2De3a8%2Dbf38%2D7f29%2D2961becdd498>

This study referenced in 2020-2021 Holliston, MA warehouse traffic study “555 Hopping Brook warehouse” and 2021 warehouse proposed in Northborough MA

https://www.town.northborough.ma.us/sites/g/files/vyhlif3571/ff/uploads/0_bartlet_trip_gen_memo_w_exhibits_10-16-20.pdf

This study referenced 2018 Mason Ave Industrial Park Warehouse, Daytona Beach, FL

<https://crw.codb.us/etrakit3/viewAttachment.aspx?Group=PROJECT&ActivityNo=DEV2018-047&key=MLP%3A1805070435085314>

“Parking Generation Manual”, 5th Addition, Institute of Transportation Engineers

	Standard Warehouse/ Storage	Transload Facility	Short-Term Storage	Cold Storage	Fulfillment Center	Parcel Hub
Location	Typically in an industrial area within urban area or urban periphery	Typically in an area with convenient freeway access; often in rural or urban periphery area	Typically in an area with convenient freeway access	Depends on supply and demand markets	Often near a parcel hub or USPS facility, due to time sensitivity of freight	Typically in close proximity to airport; often stand-alone
Overall Site Layout						
Employee Parking		Smaller employee parking ratio (per facility square foot) than fulfillment center or parcel hub	Smaller employee parking ratio (per facility square foot) than fulfillment center or parcel hub		Larger parking supply ratio than for all other HCW types	Larger employee parking ratios; truck drivers often based at facility (i.e., parking may be for both site employees and drivers)
Truck & Trailer Parking	Limited truck parking area; increases with distance to major distribution hub	Large, open trailer parking area surrounding facility; produces high land to building ratio	Ratio of truck parking spaces to docks can vary between 0.5:1 and 1.5:1, with 1:1 being very common	Can vary with whether products are frozen or perishable ⁴	Significantly higher truck parking ratios than for other HCWs	Very high truck parking ratios to dock positions, often 2:1 or more
Loading Dock Location	Either on one side or on two adjacent sides	Minimum of two sides (adjacent or opposite); can be on four sides	On either one or two sides			Usually on both long sides of building; can be on four sides

Excerpt of Table 2 in "High Cube Warehouse Trip Generation Page 5

Table 6. Weighted Average Rates for AM Peak Hour Trips at High-Cube Warehouses

Type of High-Cube Warehouse	Weighted Average for AM Peak Hour Trips per 1,000 GSF			
	All Vehicles	Cars	Trucks	5+ Axle Trucks
Transload & Short-Term Storage (94)	0.082	0.057	0.024	0.015
Cold Storage (9)	0.103	0.061	0.038	0.027
Fulfillment Center (1)	0.841	0.818	0.023	0.009
Parcel Hub (1)	0.851	0.428	0.423	0.041
ITE Trip Generation Manual – 9 th Edition	0.11	--	--	--

Note: The values in parentheses represent the number of data collection sites for HCW type.

Table 7. Weighted Average Rates for PM Peak Hour Trips at High-Cube Warehouses

Type of High-Cube Warehouse	Weighted Average for PM Peak Hour Trips per 1,000 GSF			
	All Vehicles	Cars	Trucks	5+ Axle Trucks
Transload & Short-Term Storage (95)	0.108	0.086	0.023	0.010
Cold Storage (9)	0.129	0.087	0.042	0.031
Fulfillment Center (1)	1.979	1.944	0.035	0.013
Parcel Hub (1)	0.803	0.568	0.235	0.009
ITE Trip Generation Manual – 9 th Edition	0.12	--	--	--

Langdon Studies indicate Code 156 Parcel Hub variant of High Cube Warehouse

350,000 sq ft / 1,000 = 350 (other area is office recently reduced to 6 k sq ft)

350 x 0.235 = **82 Truck Trips per PM (afternoon) Peak Hour**

350 x 0.423 = **148 Truck Trips per AM (morning) Peak Hour**

Excerpt of Table 6, 7 in “High Cube Warehouse Trip Generation

Conflicts within F.A. Hesketh Queuing Study

- F.A. Hesketh agrees with Langdon on Parcel Hub Code 156
- F.A. Hesketh Queuing analysis indicates 32 peak hour truck trips
 - Data from ITE 2016 “High Cube Warehouse Trip Generation” when applied to 22-01P facility size indicates 82 to 148 Peak Hour truck trips
- $82/32 = 2.5$ times as many PM trucks as in F.A. Hesketh’s Analysis
- $148/32 = 4.6$ times as many AM trucks as in F.A. Hesketh’s analysis

- **COMMISSIONERS – PLEASE ASK** F.A. Hesketh to explain this Discrepancy
- **COMMISSIONERS – PLEASE ASK** F.A. Hesketh how many Queuing Analysis they have performed on WAREHOUSES – their past limited queuing studies appear to focus on bank and car wash drive throughs

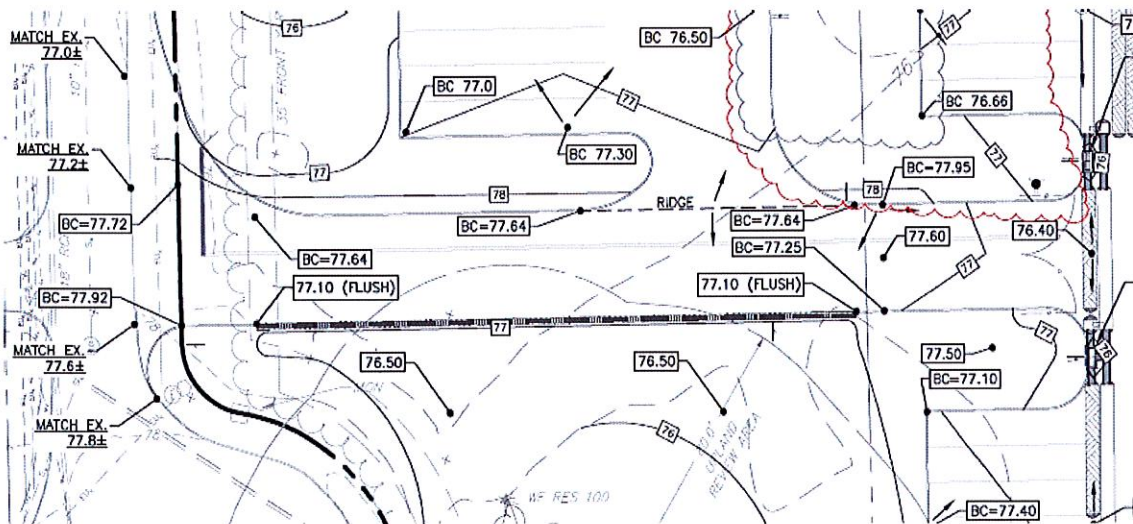
No Tenant Named = P&Z Must Assume Worst Case Scenario

- Although Parcel Hub use indicated by Langdon, Sept. 2021 Special Hearing of Economic Dev. Committee Meeting cited **Fulfillment Center** use
- “Parking Generation Manual”, 5th Addition, ITE, 2019, provides only general data on Warehouses, and does not break down into Fulfillment Centers, Parcel Hubs, Cold Storage etc. In this document, Worst Case numbers from Warehouse category are used
 - By Gross Floor Area, factor is 1.96, 359,000 x 1.96 = 703 Parking Spaces needed
 - By number of Employees, factor is 2.00, 300* x 2 = 600 Spaces Needed
 - * Source of permanent jobs Goman and York report for 25 Talbot economic impact
- Repeating Feb 8th testimony, S. Windsor Zoning 6.4.3 requirement 718 spaces
- Rationale: Some truck drivers may go on 2-3 day trips leaving cars behind. Delivery vans (e.g. Sprinter) may occupy car parking.

Economic Impact

Job Creation – Construction and Trucking Jobs	
Jobs	Jobs
Construction Jobs – Temporary During Construction	109
Warehouse Jobs – Permanent	300
Truck Driving – Freight – Permanent	108
Total Jobs – Permanent	408

No Catch Basins Appear Anywhere Near Truck Entrance



Excerpt from 22-01P
Site Plan Revision
posted March 3,
2022 Sheet C-GD1

Stormwater Drainage Route through Pipe Not Compliant with Town Improvement Standards

- Stormwater Management Report states stormwater will depart adjacent basin through 36" pipe on Carla's Pasta site
- Refer to Improvement Location Survey Record for Carla's Pasta Sheet V-2 page 2 of 3
 - Exit from basin is 24" not 36" as indicated in 25 Talbot Stormwater Management
 - Of greater concern, per survey noted above, **south easterly 36" pipe segment has slope of only 0.0033 ft/ft (0.33%)** significantly below the Town of South Windsor Improvement minimum of 0.005 ft/ft (0.5 %) slope.
 - Sediment can more readily clog pipe
 - Pipe is corrugated plastic, can flex during burial to essentially no or even negative slope
 - Without slope water will not flow, reference Manning's Equation which factors diameter, pipe slope and interior smoothness to estimate flow
 - S. Windsor Specification 2.3.0 (g) Storm drains will be designed to maintain a minimum velocity of 2.5 feet per second when the pipe is full, however, **at no time will the slope be less than 0.50% (.005 ft/ft).**
 - There are other potential concerns with the Stormwater Management Plan regarding predevelopment conditions still being studied

Artists rendition of 278,000 sq ft warehouse being built in Shodunk, NY..
Note the very wide Perimeter Road (Ref. S Windsor Zoning 6.4.4-l)
Applicant 22-01P lacks AutoTurn™ analysis showing S. Windsor's largest fire
apparatus (ladder truck) could get around the building, also affects queuing (6.4.8-3)

Set on 56 acres

Almost 500 parking spaces
Sound fence 1500 feet long
20 feet high

<https://www.timesunion.com/business/article/Amazon-wants-to-build-second-warehouse-in-Schodack-16187901.php>



John E. Holowczak
South Windsor, CT 06074

Summary

John is an engineer by training and profession. He holds Bachelor of Science and Master of Science degrees in ceramic engineering, and a major focus of his career has been to take certain minerals found in soils and transform them into components used in energy conversion devices such as engines. His coursework overlaps that of a soil scientist by roughly 15 credit hours of the 30 required by State of CT for a Wetlands Scientist. He has experience in tailoring ceramic materials and components for energy absorption including acoustic (noise) absorption, such as the use of tailored Helmholtz resonators.

Professional Experience

Associate Director – Adv. Materials, United Technologies Research Center East Hartford, CT
- Lead development of fiber/matrix interface coating techniques and novel high temperature matrices for turbine CMCs (materials derived from silica – i.e. sand)
- Provide technical, strategic partnership and R&D contract development to P&W's CMC Team
- Principal Investigator, U.S. Dept of Energy hybrid ceramic/CMC turbine vane design/demo

Engineer & Project Leader – Ceramic & Coatings, UTRC, East Hartford, CT
- Various roles of increasing responsibility in aerospace materials development & application.
- Lead development of ceramic/ceramic matrix composite hybrid systems for applications including helicopter protection and turbine components.
- Project leader for design, manufacturing development and test of silicon nitride components for small turbine engine applications, including UAV, APU and microturbine applications.
- Coordinate efforts of approx. 30 personnel in multi-company team for design, fabrication and testing of cooled all ceramic turbine vanes.
- Solid Oxide fuel cell development for CO₂ free conversion of fuel to electricity
- Develop CMC materials and fabrication techniques for turbine engine exhaust structures including sound absorption.

Research Engineer – Norton/TRW Joint Venture for Heat Engine Ceramics – Northboro, MA
- Develop complex shape fabrication techniques for producing silicon nitride and silicon carbide gas turbine components (derived from silica sand), in a pilot plant manufacturing environment.

AWARDS

- United Technologies Horner Citation – 787 APU Sole Source Contract Win.
- R&D 100 Award (led team) Actively Cooled Monolithic All-Ceramic High Pressure Turbine Vane with Environmental Barrier Coating.

SOCIETIES

- Chair Emeritus of the U.S. Advanced Ceramics Association (trade association)
- Member, American Ceramic Society.

PATENTS

- Hold 33 patents on areas including ceramic armor, ceramic to metal attachments, environmental protection coatings, and CMC component design. Additional patents pending.

EDUCATION

M.S. in Ceramic Science, Rutgers, the State University of New Jersey
B.S. in Ceramic Engineering, Rutgers, the State University of New Jersey

EXHIBIT G

TOWN OF SOUTH WINDSOR PLANNING & ZONING COMMISSION

APPLICATION 22-01P, 25 TALBOT LANE SITE PLAN

MARCH 8, 2022

COMPLIANCE WITH REGULATIONS

QUESTION: Does Application 22-01P comply with the Town of South Windsor Zoning Regulations?

ANSWER: No. The Application presented fails to comply with Sections 2.1, 4.1.5, 6.1.5 of the Town of South Windsor Zoning Regulations and Town Ordinance Section 50-61 et seq.

Application:

The Project name is "25 Talbot Lane" and the box checked is "Site Plan of Development".

TOWN OF SOUTH WINDSOR ZONING REGULATION

2.1 Compliance with the Provisions of the Regulations

No building, structure or premises shall be used or occupied, and no building or part thereof or other structure shall be erected, raised, moved, placed, reconstructed, extended, enlarged, or altered except in conformity with the regulations herein specified for the district as shown on the official map in which it is located.

4.1.5 Traffic Requirements

To provide for the orderly flow of inbound and outbound site generated traffic, and to minimize the inherent conflict between outbound left and inbound left maneuvers, applicants must demonstrate to the Commission's satisfaction that the site generated traffic is able to enter and exit the site safely without disruption to the external traffic flow. On-site queuing provisions must be adequate to prevent site generated traffic from queuing on public streets. Site lines for the existing traffic from the site drive must be satisfactory for the prevailing speed of approaching traffic. The applicant must demonstrate that the design provides for safe and orderly vehicular and pedestrian flow and movement of traffic and minimizes vehicular and pedestrian conflicts. Delivery areas must be located so that normal operations are not impeded or compromised. An

engineered traffic report must be provided with the application to demonstrate the adequacy of traffic flow and design.

Attached hereto and marked Exhibit B & C are two the Affidavits of Derrick Butler, both dated November 23, 2021.

6.1.5 Traffic and Circulation Considerations

To assure the smooth flow of traffic to and from sites and to minimize conflicts between pedestrians and motor vehicles, Site Plan design should incorporate the following:

1. On-site queuing provisions must be adequate to prevent site-generated traffic from queuing onto public streets.
2. Site lines for existing traffic from the site drive must be satisfactory for the prevailing speed of approaching traffic.
3. The applicant must demonstrate that the design provides for safe and orderly vehicular and pedestrian flow and movement of traffic and minimizes vehicular and pedestrian conflicts.
4. Delivery areas must be located so that normal business operations are not impeded or compromised.

A traffic report prepared by a professional engineer shall be provided with the application to demonstrate the adequacy of traffic flow and design. This report may be waived where the site-generated traffic is minimal and the Town Engineer concurs that the traffic layout is acceptable.

Site Plan Design

Attached hereto and marked Exhibit A is the report from Derrick J. Butler. Derrick Butler is a trucking expert.

Expert: A person who, through education and/or experience, has developed skill or knowledge in a particular subject so that he or she may form and opinion that will assist the fact-finder. **The Complete Illustrated Book of Development Definitions, Fourth Edition, Routledge Taylor & Francis Group, London and New York, Published 2017**

The Butler report analyses the Site Plan submitted with the Application base on his experience operating a variety of different trucking facilities over his career.

6.1.5 Requires:

1. On-site queuing provisions must be adequate to prevent site-generated traffic from queuing onto public streets.

The queuing is inadequate in that the plan was designed to accommodate wb62 tractor trailers. As the Butler report indicates, the majority of all road trucks today are wb67 tractor trailers which are 5 to 8 feet longer than the site plan will accommodate.

A wb67 tractor trailers attempting to negotiate turns on a site designed for WB-62's are depicted on the attachments to the Butler report. The report indicates the "swept-path width" involved in a wb67 tractor trailer making a turn. By superimposing the "swept-path width" onto the Applicant's Site Plan the conflicts become obvious.

The on-site conflict that will result in the wb67 tractor trailers' inability to que on site. The site design will result in pinch points and delays. As a result of the pinch points and delays, site-generated traffic will be queuing onto public streets.

2. The Applicant must demonstrate that the design provides for safe and orderly vehicular and pedestrian flow and movement of traffic and minimizes vehicular and pedestrian conflicts.

As the attachments to the Butler report depict, the failure of the site plan to provide a "swept-path width" sufficient to accommodate the wb67 tractor trailers will result in vehicular conflicts.

As mentioned in the Butler report, the failure of the Hesketh Report to include the time required for truck loading in the queuing analysis will result in further delay and additional reasons that site-generated traffic will be queuing onto public streets.

CONCLUSION

Application 22-01P does not comply with the Town of South Windsor Zoning Regulations, Sections 2.1, 4.1.5 & 6.1.5.

BY: _____

Attorney John H. Parks
Law Offices of John H. Parks
352 Billings Road
Somers, CT 06071
(860) 749-0797
JURIS # 100823

To: Mr. Bart Pacekonis

Chairman –Town of South Windsor Planning and Zoning Commission

Town of South Windsor

1540 Sullivan Ave.

South Windsor Ct. 06074

Re: 22-01p Additional detail and information for the South Windsor Planning and Zoning Commission for public input.

This application if approved will have adverse affects on public health and safety and uses a site plan not compatible with the area.

The 2/15 presentation mentioned and data provided in tables refer to the site being safe and providing orderly flow of a wb62 design vehicle. Majority of all road trucks today “highway design tractor trailers”, wb67 equipment is 5-8 ft longer. Please see exhibit A for review of wb62, and wb67 equipment. These units need a wider turn radius, and a longer swept path during turns as shown in the AASHTO exhibit for 90-180-degree turns, (American Association of Highway and Transportation Officials). See Exhibit B. Invalid statement of safe traffic flow as most trucks are wb67.

Wb62 units are generally 45' to 48' in length and are primarily only used in food service and commerce requiring smaller 45' and 48' overseas containers. Based on the applicants truck terminal article provided on 2/14/22, if food service, this application should immediately require “the terminal tag”. If the site is designed to support (wb62) trailers for overseas freight containers, this application should immediately require “the terminal tag”.

2/15 When reviewing the applicant’s plans the parking space at the dock is 60' with a 70' aisle and the parking lot across from the dock is 60'. Tractor trailer wb67 units are 73-75 ft. in length. This means a truck backed in at dock has up to a 15 ft. overhang into the main aisle. The truck parked in the adjacent 60' truck parking space is also 75 ft. with a 15ft. overhang into the main aisle. The overhangs on both sides reduce the main aisle down from 70' to 40'. Using the Brazhuman truck turn radius provided in Exhibits B, E, we find that a tractor trailer pulling out next to another unit needs more than 40' to navigate the turn to get out of the dock. The main aisle is not large enough for orderly traffic flow with high volume and will lead to on site conflicts that will back up into the queuing area and the main entrance with overflow being in

the street. Please review Exhibit E, Overlay onto the site plan using AASHTO and Brazhuman models to scale.

ON SITE CONFLICT 6.1.5-1 and -3

Also the 40 parking spaces across from the dock set up as trailer parking spaces will require blind side back in. Again this is unsafe, takes too long, and in this industry we try to avoid. This too will become a pinch point. Usually drivers try to turn around to back in on the driver's side. What is drawn is not what happens in real life situations. **ONSITE CONFLICT 6.1.5-1 and -3**

I pulled data from a report from the Federal Highway Administration, The National Cooperative Highway Research Program Report 505, NCHRP Report 505 chapter 5 Truck characteristics.

The FHWA truck characteristics study 2-3 found and developed a data table in this research to confirm swept path widths (sway- I called it), for trucks wb62 and larger are so great that the truck can't make a 90 degree right turn from one lane of a two lane road way to another while remaining within a 12' lane . Trucks making a 90 degree turn must encroach onto the shoulder or the roadway or curb line into the opposing lane and traffic.

This is highlighted in the Brazhuman analysis design vehicles and turning radii (pages 8,18), provided in Exhibits B,F. With this proposed high volume site, trucks will be exiting and entering simultaneously. This means trucks will be operating into the opposing lane of traffic for 40 feet making turns in and off of Governors, from Talbot and in and out of the site. Please see the swept path, off tracking turning exhibit with site plan over lays Exhibits C,D,F, using AASHTO design of the intersections.

LANE TO LANE TURNING CONFLICT – all turns from Governors, Talbot , into the site and into the queuing area-CONFLICT 6.1.5-1 and 3

In the applicant's (Hesketh) report, the Multi Model queuing analysis was used.

During the last PZC meeting on 2/15 the applicant's representative made the statement that the trucks would not need to pre-trip inspect because they would not originate at the site. That is in conflict with The Gorman and York fiscal impact report provided by the applicant's team. In the table on page 3 of the report, they list the impact of the additional 108 new truck driving jobs the project will create. How could one add 108 driver jobs and not have trucks originate or terminate at the site? The pre-trip inspection has to be done for the all tractors and trailers even if the trailers are preloaded and dropped.

In the Feb. 8 letter to the chairman from the applicant (2nd page 5th paragraph), the applicant's representative remarked on how it is important to look at the potential queuing at the gate access. As quoted, "Although there are enough docks, the choke point could be in the initial gate access. As indicated above each truck needs to complete paperwork prior to entering the dock." It seems clear the applicant's team has an idea where the choke points will be.

Usually, the drivers check in when they arrive at a gate/I only know of one company that completes their check in by blue tooth and GPS.

Typically this takes longer than 5 minutes. The paperwork usually is not complete until the truck is unloaded. The freight has to be counted and verified by item. Inventory checked for OSD (overages, shortages, and damages) and then updated against what was purchased. If there are exceptions, and often there are, it can tie up the truck, and dock door for 20 min. after unloading.

The unload times projected do not account for the variety of real world situations that occur. This, in my opinion, makes the summation of the applicant's team incorrect.

In the review of their analysis, the applicant's representative, (page 2) of the Hesketh report, lists unload times that are the basis of the report that are not realistic. I agree, there are some truckloads we unload in 1-2 hours. There are just as many truck loads that take 4-5 hours. Any trailer that is floor loaded rather than palletized, like overseas containers, even air freight pans, take 4-5 hours to strip and receive in. These loads take 4-5 hours to off load as every item has to be individually handled. The average is 4hrs. Based on my experience working in these operations for 40 years, I believe the times projected are not accurate.

Backlog from the site will spill over into the public road. The applicant's representative did not address the extra times needed for loading.

No times were included in the analysis for truck loading. Loading activity usually ties up almost half of the dock doors and up to half of the assets in labor and handling equipment. This makes the m/m queuing analysis invalid for this site. Typically many of the loading dock doors in our industry are tied up for packing, counting, comingling, loading outbound shipments. Why might important details be missing? Perhaps the applicant's team did not realize it would make the traffic flow projections invalid. The inbound off load ITE service parameters in the flow analysis the applicant's report used, therefore is not valid in my opinion. This type of situation tends to create delays at the dock that will lead to congestion at the site and spill over onto Talbot.

The applicant's team used the Poisson distribution model in their analysis. This model suggests 38 units in the site system at a time and 40 dock doors as sufficient to handle 100% of the inbound peak traffic. When we factor in an operation using potentially half of the site assets involved in loading outbound, it reduces dock door capacity in half. This would leave only 27 dock doors available for inbound. Actually only 25 available if 1 dock is reserved for trash and a dock reserved for cardboard as is common. With at least half of the inbound units arriving taking double the time to unload, and half of the assets involved with outbound, there can be 57 units on site by 10:30 in the a.m. This conflicts with the data used in the Poisson model used.

By 11a.m. to keep up with the inbound flow of 19 per hour, the site is already short by over 30 doors. In my professional opinion, we will have 4-5 queuing spaces unusable based on angles needed to navigate. This would indicate that twenty-five queuing spots could be filled by lunch time. When considering common operational activities, this site has the propensity to create, back-ups, pinch points and spill over that will lead onto Talbot Lane, based on the volume of site traffic projected in this site plan. Based on my experience, this indicates that the site is not large enough for the size of the operation projected.

Bulletins

We haven't even addressed the environmental impacts of 40 dock doors in operation 10 hours per day using 40 fork lifts with propane exhaust of carbon monoxide.

Back up alarms on trucks are not mentioned in any sound analysis. Environmental Health Perspective Journal Jan. 2011 volume 119 reports vehicle back up alarms are 97-112 db at the source.

ITE Report used by the applicant mentions 25% of truck traffic will exit the site @ Talbot turning right. That is 52 trucks per day to an already bad situation. None of the traffic study lists or reports outbound truck traffic heading east on Governors and using the intersection of Governors and Rte 30.

CONFLICT 6.1.5-1 and 3

In closing and most importantly, I have worked and still work in a multi function facility. The actual work of the site determines it's usage. We pack, sort, repack and provide short term storage in some areas, with trucking and terminal work being the main stay.

The applicant's site can have different functions as well, but having 54 dock doors and a volume of 209 trucks per day indicates the preponderance of the work will be loading, unloading, comingling, and consolidating freight in the form of LTL and TL truckloads

and containers. If any of the merchandise handled by the site is finished goods continuing on into the supply chain or delivering to consignees, it should be classified as a terminal. **Based on the applicant's truck terminal article provided on 2/15/22, if food service, this application should immediately require "the terminal tag".** If the site is designed to support (wb62) trailers for overseas freight containers, this application should immediately require "the terminal tag".

The NYU Rudin Center for Transportation Policy and Management produced a report for the NY DOT titled "Urban Distribution Centers A Means to Reduce Freight Miles Traveled". In A-4 page 48, "Integration with Logistics Networks", these new centers are referred to as consolidation (UDC's), or urban distribution centers, city terminals.

This is a high volume site with more truck trips than some of the freight terminals I've worked at.

In my opinion, this site plan appears to show the characteristics of a high yield multi-function operation with the primary characteristics required to support the work of a large trucking and freight transfer center with other functions as seems to be the current trend. This site is within 500 ft. from the neighborhood and should be classified as a terminal. It brings all of the hazards of a freight terminal to the neighborhood. In my opinion, by design this facility is not compatible to the area proposed.

Thank you for your time and consideration in this matter.

Respectfully submitted,

Derrick J. Butler

596 Governors Highway

Exhibit B

Brazhupan Corp design vehicles and turning radii by Dr. Scott Washburn

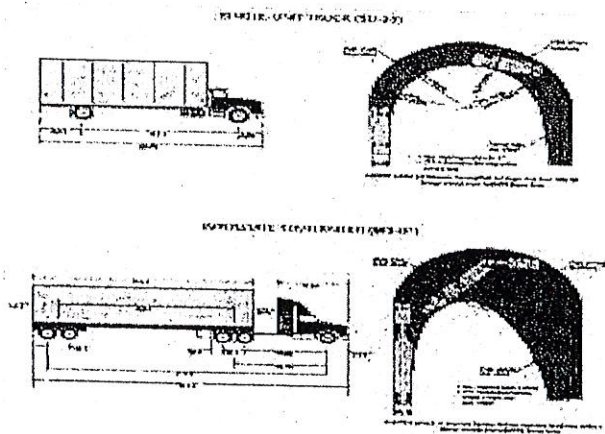
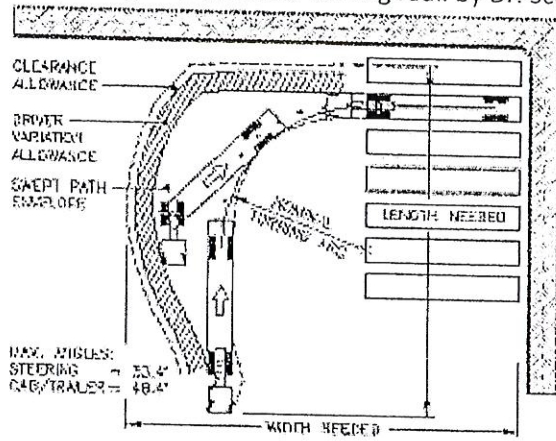
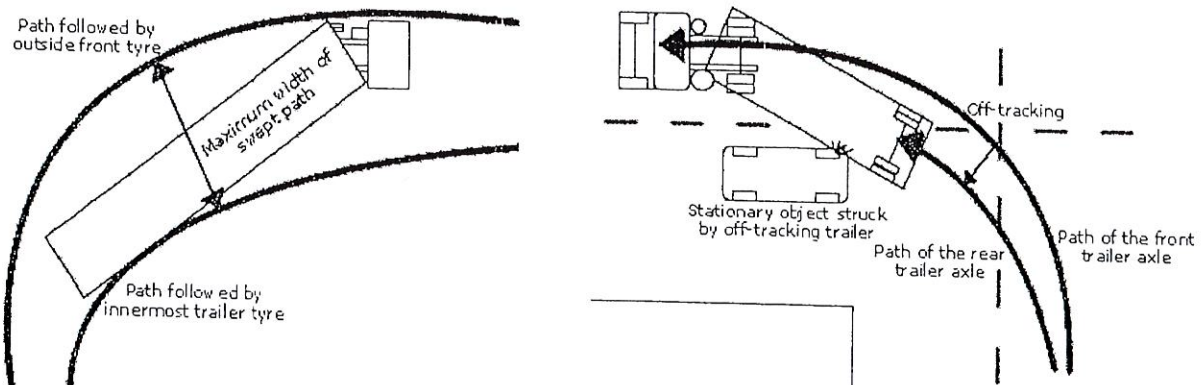
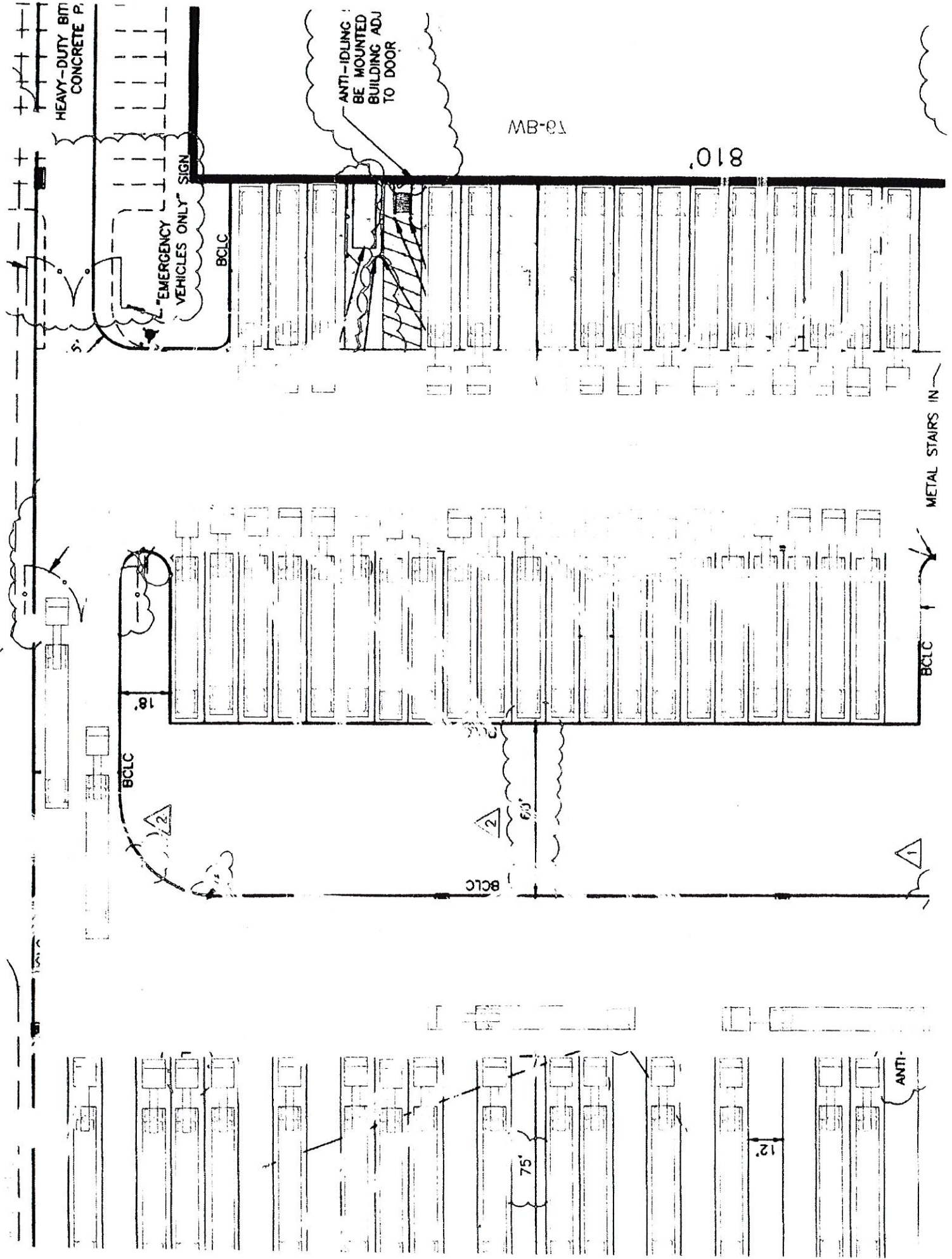
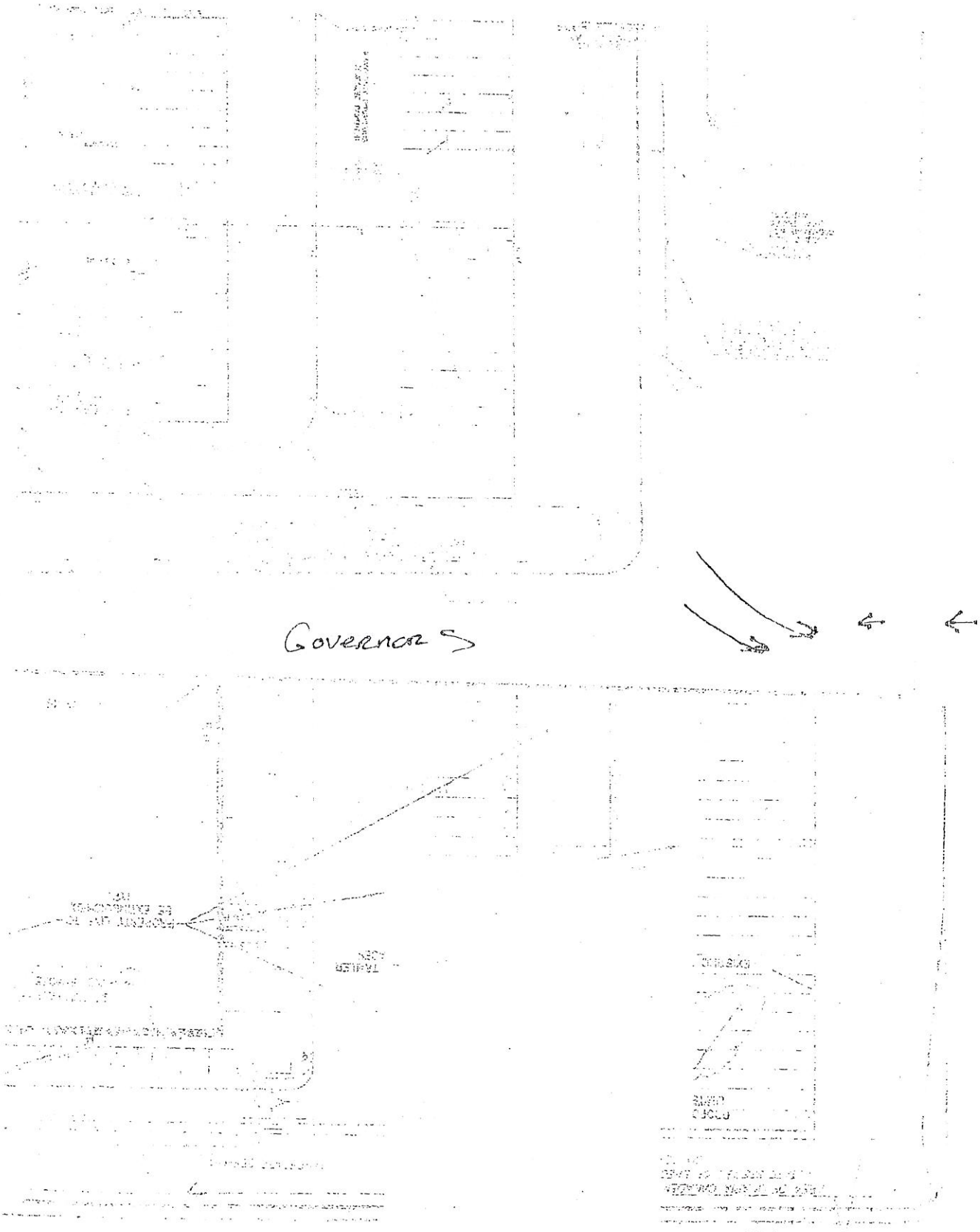


Exhibit C Swept Path & off tracking by Brazhupan Corp.





Ex F,



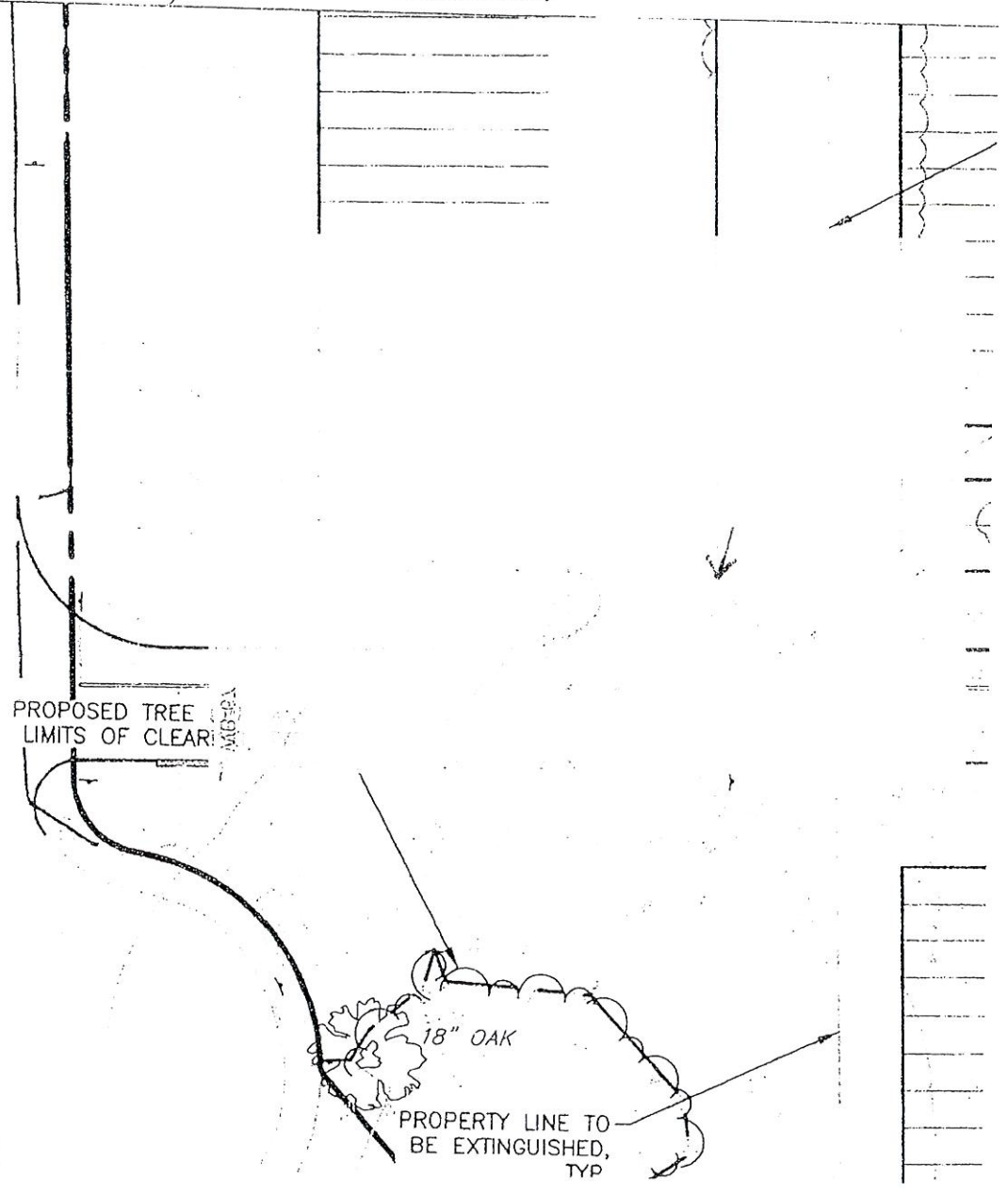
Governor

TAMER
BOEN

SECRET

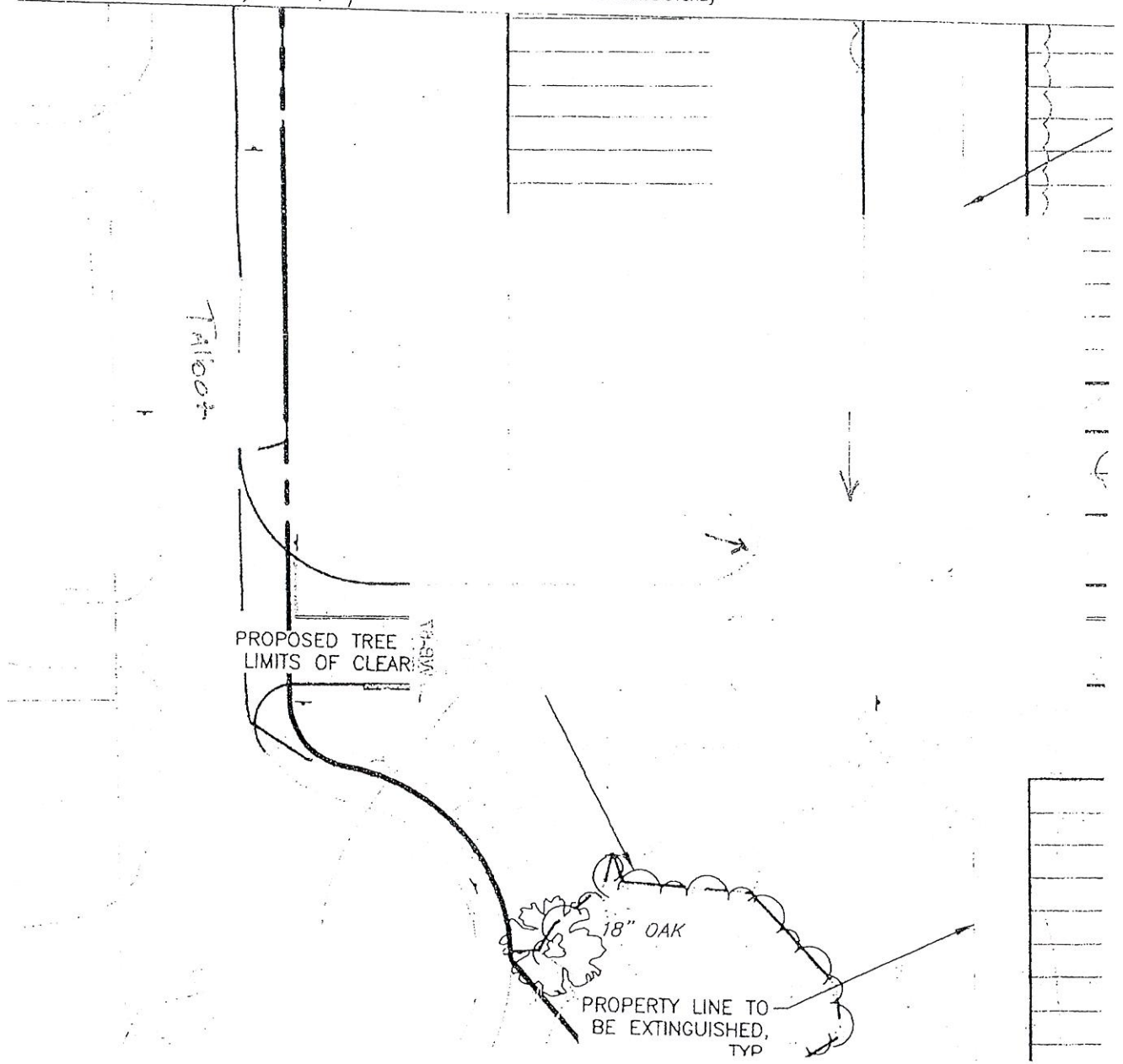
EX F 3

Re: Truck radius overlay



EX 14

Re: Truck radius overlay



To South Windsor Planning and Zoning Commission Regarding Pending Application 22-01P (25 Talbot Lane Site Plan)

Public Hearing March 08, 2022

Dear Commissioners,

Some people might argue 25 Talbot Lane project is just one of the many warehouse projects in South Windsor. What they refuse to acknowledge is its unprecedented proximity to residential neighborhoods and detrimental disturbance to ordinary people's lives. That is why this project requires careful scrutiny to determine its compatibility with the abutting zones. To that end, I appreciate your persistent effort to make sure all the decisions can withstand the test of time. And I also thank you for your dedicated services to our town at such a busy time.

I strongly oppose this pending Application 22-01P. Adding to the enormous concerns already voiced by other neighbors, I would like to raise your attention to several issues identified in the Traffic Impact Study from the applicant's traffic engineer LANGAN, and the Queuing Report from Hesketh.

1. Daily trip generation estimation is much lower than maximum

Table 1 from LANGAN's traffic impact study anticipates 1,667 weekday daily trip generation from this project. This number is far below the 3,830 daily trip ends estimated from the highest trip generation rate provided by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, the same data source LANGAN referenced. Data provided by the ITE manual is based on statistical analyses so naturally the trip generation rates follow certain statistical distributions, variances, and standard deviations. In particular to the dataset selected by LANGAN – Land Use Code 156, High-Cube Parcel Hub Warehouse, its trip generation rate is highly dispersed and there could be several times of difference between the highest and lowest possible values. In this project, because the applicant does not disclose who the tenant will be, the most conservative and reasonable approach for evaluating its potential traffic impact is to look at the highest possible trip generation provided by the ITE manual. But LANGAN did not provide any insight to help make that judgment.

2. Peak hour traffic is not the real peak hour traffic generation from the site and is under-reported

According to the ITE manual, there are two peak hour traffic scenarios for site generated traffic estimation. One is the site traffic happening during the peak hour of the adjacent street traffic (in AM or PM). The second is the site traffic generation during its own peak hour (in AM or PM). Peak site traffic generation given by these two scenarios may not coincide with each other, especially in this case where the site's own peak hour traffic is the higher one. LANGAN did not disclose which peak hour traffic scenario they used in their Table 1 but Hesketh's report indicated it is from the peak hour of adjacent street. My calculation shows the maximum peak hour traffic of generator is 421 in AM and 342 in PM for all vehicles. Both are much higher than the reported values.

3. Truck trips are much higher than reported and the subsequent queuing analysis is questionable

Table 1 from LANGAN study also assumed certain truck and personal vehicle split ratios. If we multiply those truck ratios by the corrected maximum daily trip, there could be a maximum of 480 truck trips per weekday. The bottom of page 1 of Hesketh's Queuing Report clearly says "... the proposed 359,640 s.f. building has a **maximum** daily truck generation of 209...". By no means this truck trip generation of 209

could be the maximum. This severely under-reported number makes the subsequent queuing analysis questionable.

Conclusion

The above analysis is based on basic engineering judgement and the ITE Trip Generation Manual 10th Edition. Newer version of the manual and other ITE references may push the trip estimations even higher. The entire calculation process is presented transparently in the attached Appendix without any hidden corner. The Excel spreadsheet used in this analysis is also submitted for your reference. Since this analysis only investigates a portion of the traffic study, I am not sure if there could be more issues under the hood. But I want to remind you of LANGAN's track record in their previous versions of traffic study, where the traffic accident crash count at the intersection of Route 5 and Governor's Highway was blatantly reduced from 9 down to 1. Today with these new findings, I strongly urge your commission to reject this application on the basis of failing to demonstrate the satisfaction of traffic requirements.

Thank you for reading my letter.

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Wei Zhang', with a stylized flourish at the end.

Wei Zhang, Professional Engineer

125 Cody Cir

March 08, 2022

Appendix

25 Talbot Lane Project Trip Generation Estimation

Based on Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017
Newer edition may have higher estimation

LANDUSE: High-Cube Parcel Hub Warehouse
 LANDUSE CODE: 156
 LOCATION: General Urban / Suburban
 GROSS FLOOR AREA (KSF): 360 thousand square-foot

Vehicle Trip Generation per 1000 Sq. Ft. Gross Floor Area Provided by the ITE Trip Generation Manual

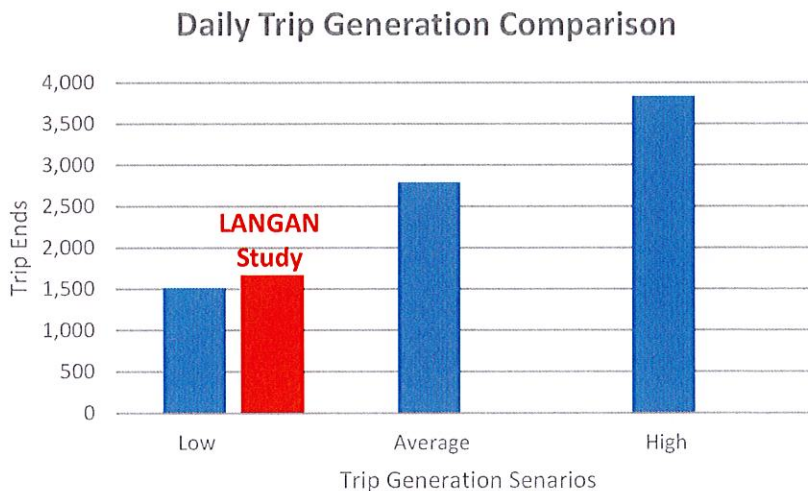
WEEKDAY RATES	Low	Average	High
WEEKDAY DAILY	4.2	7.75	10.64
AM PEAK OF GENERATOR	0.57	0.88	1.17
PM PEAK OF GENERATOR	0.44	0.71	0.95
AM PEAK (ADJACENT ST)	0.38	0.7	0.85
PM PEAK (ADJACENT ST)	0.26	0.64	0.86

Multiply above rates by 360 (1000 Sq. Ft.),
we can estimate 25 Talbot Lane Project Trip Generation as following

Trip Ends	Estimated From ITE Rates			LANGAN Study*
	Low	Average	High	
WEEKDAY DAILY	1,512	2,790	3,830	1,667
AM PEAK OF GENERATOR	205	317	421	
PM PEAK OF GENERATOR	158	256	342	
AM PEAK (ADJACENT ST)	137	252	306	275
PM PEAK (ADJACENT ST)	94	230	310	253

* Table 1, page 8, Traffic Impact Study from LANGAN, January 2022

Site generated Peak Hour Traffic is higher than site traffic during adjacent street Peak hour



Appendix

Truck Trip Estimation From Maximum Trips by ITE Manual And Truck Trip Split Calculated From LANGAN Study

Truck Trips Provided By Table 1, page 8, Traffic Impact Study from LANGAN, January 2022

VEHICLE TYPE	DAILY	AM PEAK HOUR TOTAL	PM PEAK HOUR TOTAL
PV	1458	243	231
Trucks	209	32	22
Total	1667	275	253

Truck/PV Trip Split Ratio Back-Calculated From Above Table

VEHICLE TYPE	DAILY	AM PEAK HOUR TOTAL	PM PEAK HOUR TOTAL
PV	87%	88%	91%
Trucks	13%	12%	9%

Maximum Trip Generation Calculated From 2017 ITE Manual (From page 1)

VEHICLE TYPE	DAILY	AM PEAK HOUR TOTAL	PM PEAK HOUR TOTAL
PV and Trucks	3,830	421	342

Truck Trip Estimation - High Traffic Scenario

Multiply truck ratio by maximum trip generation

VEHICLE TYPE	DAILY	AM PEAK HOUR TOTAL	PM PEAK HOUR TOTAL
PV	3,350	372	312
Trucks	480	49	30
Total	3,830	421	342

Note:

Newer Version of ITE Manual and other ITE references may push the trips even higher

AM PEAK HOUR is **ONE HOUR** when trip generated by the site is the highest in the morning

PM PEAK HOUR is **ONE HOUR** when trip generated by the site is the highest in the afternoon

Appendix

ITE Trip generation rates were referenced from:

VHB Traffic Study Technical Memorandum Submitted to Northborough Planning Board, Page 10, 10/16/2020

https://www.town.northborough.ma.us/sites/g/files/vyhlf3571/f/uploads/0_bartlet_trip_gen_memo_w_exhibits_10-16-20.pdf

Definition of Terms

Average Weekday—a continuous 24-hour period during Monday through Friday. The period can bridge two days.

Average Weekday, Peak Hour of Adjacent Street Traffic—the one hour within the morning and evening weekday commuter peak periods when the combination of site-generated traffic and the traffic on the adjacent street is the highest (typically from data collected Monday through Friday). If the adjacent street traffic volumes are unknown, the peak hour of the adjacent street is assumed to be the one hour when the highest hourly vehicle trips are generated by the site during the weekday commuter peak periods between 7:00 and 9:00 a.m. or 4:00 and 6:00 p.m. Recent studies have indicated that these peak periods have expanded in some heavily populated areas.

Average Weekday, Peak Hour of Generator—the hour of highest volume of traffic entering and exiting the site during the AM or PM on a weekday (typically from data collected Monday through Friday). **It may or may not coincide with the peak hour of the adjacent street traffic.**

February 8, 2022

Mr. Bart Pacekonis - Chairman
Planning & Zoning Commission
Town of South Windsor
1540 Sullivan Avenue
South Windsor, CT 06074

**Re: Proposed Warehouse Development
UW Vintage Lane II, LLC
25 Talbot Lane
South Windsor, Connecticut
Our File: 22010**

Dear Mr. Pacekonis:

On behalf of our client, UW Vintage Lane II, LLC, our office has prepared this letter to outline the potential truck trip generation and truck queuing/marshalling requirements related to a proposed 359,640 s.f. warehouse and distribution center proposed for property located at 25 Talbot Lane in the Town of South Windsor, CT. This letter presents our findings.

The proposal is to construct a 359,640 s.f. warehouse/distribution center with a total of 54 loading docks. The revised site plan depicts a total of 318 vehicle spaces, 59 trailer spaces and 30 trailer queueing/marshalling spaces. Access to the site is proposed at two locations. Vehicular access is provided by a driveway to the Governor's Highway, located east of Talbot Lane, and a truck access driveway is proposed to Talbot Lane.

In order to determine the potential truck trip generation for the proposed site, the Institute of Transportation Engineers (ITE) *Trip Generation* Report was consulted. *Trip Generation* presents trip generation estimates for many land uses based on counts conducted at existing facilities throughout the country. Included within the ITE database are several Industrial Land Uses including: Land Use Code (LUC) 110 - General Light Industrial; LUC 140 – Manufacturing; LUC 150 - Warehouse; LUC 154 – High Cube Transload and Short Term Storage Warehouse; LUC 155 – High Cube Fullfillment Center Warehouse; LUC 156 – High Cube Parcel Hub Warehouse; and LUC 157 – High Cube Cold Storage Warehouse. The truck trip generation for each land use is based on the square footage of the building.

The truck trip generation was run for each land use. Using the ITE Trip Generation report the proposed 359,640 s.f. building has a maximum daily truck generation of 209,

March 8, 2022

44 Cody Circle, South Windsor 06074

EXHIBIT I

TO: South Windsor Planning and Zoning Commission
FROM: John Hapkiewicz
Civil Engineer
CT P.E. License No. 20870
RE: Stormwater analysis for PZC Application 22-01P 25 Talbot Lane

Dear Commission Members:

The stormwater report and analysis for this application is incomplete per the South Windsor Zoning Regulations, particularly section 6.6.5. This section requires determination and mitigation of the effect of increased volume on downstream watercourses and bodies of water, which has not been provided. There are ten culverts on the drainage course between the property and the Connecticut River, as well as retention ponds and wetlands.

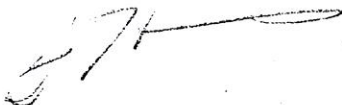
The Stormwater Management Report for this project states:

The proposed stormwater management system as discussed herein and shown on the referenced plans is appropriate for the proposed development on the subject site and should not pose any detrimental impacts to the environment.

However, this statement cannot be made without the required assessment and mitigation.

Further, the Stormwater Management Report indicates that all stormwater from the site will exit through a 36" pipe to the Newbury Brook. A review of the Improvement Survey Record for Carlas Pasta, sheet V-1, indicates the most southerly pipe segment, nominally 270 feet long, has a slope of only 0.0033 ft/ft. The South Windsor Public Improvement Specifications, part 2.3.0 (g) requires a minimum slope of 0.5% (0.005) in keeping with common civil engineering design principals to minimize sediment build up and account for installation tolerances. This calls into question the ability to reliably convey stormwater.

Sincerely,



John Hapkiewicz
Civil Engineer
CT P.E. License No. 20870

March 8, 2022

Oneil, Caitlin

From: Lipe, Michele
Sent: Thursday, February 24, 2022 3:20 PM
To: Oneil, Caitlin
Subject: FW: [External]Re: [External][Town of South Windsor CT] 25 Talbot lane warehouse (Sent by christopher edlund, amtual@hotmail.com)

From: Christopher Edlund <amtual@hotmail.com>
Sent: Thursday, February 24, 2022 9:56 AM
To: Lipe, Michele <Michele.Lipe@southwindsor-ct.gov>
Subject: [External]Re: [External][Town of South Windsor CT] 25 Talbot lane warehouse (Sent by christopher edlund, amtual@hotmail.com)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.

<https://www.facebook.com/101181542381091/videos/5398683376826395/?fs=e&s=cl> Please pass on to the planning and zoning board. As you know , no provision was added in the site plan for snow removal and storage on site . Regarding the proposed warehouse with 400 tractor trailer trucks a day off 25 Talbot lane , with that many trailer leaving during a snow event , shouldn't the device to remove snow from the top of the trailers be required for the safety of drivers on governors highway when they leave ?

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From: Christopher Edlund <AMTUAL@HOTMAIL.COM>
Sent: Tuesday, February 8, 2022 11:09:46 AM
To: Lipe, Michele <Michele.Lipe@southwindsor-ct.gov>
Subject: Re: [External][Town of South Windsor CT] 25 Talbot lane warehouse (Sent by christopher edlund, amtual@hotmail.com)

Thank you

Get [Outlook for iOS](#)

From: Lipe, Michele <Michele.Lipe@southwindsor-ct.gov>
Sent: Tuesday, February 8, 2022 10:51:43 AM
To: 'amtual@hotmail.com' <amtual@hotmail.com>
Subject: RE: [External][Town of South Windsor CT] 25 Talbot lane warehouse (Sent by christopher edlund, amtual@hotmail.com)

Thank you for your comments. They will be submitted for tonight's public hearing.

Michele

Michele M. Lipe, AICP
Director of Planning
Town of South Windsor
1540 Sullivan Ave.

Oneil, Caitlin

From: Lipe, Michele
Sent: Wednesday, March 2, 2022 1:10 PM
To: Oneil, Caitlin
Subject: FW: [External][Town of South Windsor CT] 25 Talbot lane application March 8th planning and (Sent by Christopher Edlund , amtual@hotmail.com)

From: Contact form at Town of South Windsor CT <cmsmailer@civicplus.com>
Sent: Wednesday, March 2, 2022 12:38 PM
To: Lipe, Michele <Michele.Lipe@southwindsor-ct.gov>
Subject: [External][Town of South Windsor CT] 25 Talbot lane application March 8th planning and (Sent by Christopher Edlund , amtual@hotmail.com)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.

Hello mlipe,

Christopher Edlund (amtual@hotmail.com) has sent you a message via your contact form (<https://www.southwindsor-ct.gov/user/426/contact>) at Town of South Windsor CT.

If you don't want to receive such e-mails, you can change your settings at <https://www.southwindsor-ct.gov/user/426/edit>.

Message:

I request that my comment be read allowed at the March 8th planning and zoning commission public hearing. I Christopher Edlund of 11 Beldon road South Windsor request the commission not approve the application for 25 Talbot lane warehouse Because I truly believe it will result in a hazardous environment to many residents.

Oneil, Caitlin

From: PlanningZoningComments
Sent: Tuesday, February 22, 2022 3:02 PM
To: Oneil, Caitlin
Subject: Fw: [External]Fw: Recording + Resources: The Inequitable Impacts of Amazon's Facilities on BIPOC Communities

From: Jim Clyburn <jhcamc@yahoo.com>
Sent: Thursday, February 17, 2022 2:44 PM
To: PlanningZoningComments
Subject: [External]Fw: Recording + Resources: The Inequitable Impacts of Amazon's Facilities on BIPOC Communities

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.

James Clyburn, 35 Cody Circle, So. Windsor. (46 year resident)

Please do the right thing for these neighborhoods, protect our children's and our health, and the community as a whole. Don't yield to pressure from elected officials and "favored" designer. This will cost taxpayers in terms of road destruction, maintenance, drainage, police and fire protection, public works, etc.,

----- Forwarded Message -----

From: CR Community <community@cr.consumer.org>
To: James Clyburn <jhcamc@yahoo.com>
Sent: Wednesday, January 26, 2022, 11:50:27 AM EST
Subject: Recording + Resources: The Inequitable Impacts of Amazon's Facilities on BIPOC Communities



James --

Thank you for joining yesterday's panel on the Inequitable Impacts of Amazon's Facilities on BIPOC Communities. We hope you learned more about this issue from our discussion, and are eager to find ways to get involved and support frontline communities dealing with these impacts.

Deborah Beacham
120 Hilton Drive

Planning & Zoning,

Feb. 21, 2022

Dear Commission,

Once again I please implore you to vote NO to 25 Talbot Lane Warehouse. This area is not conducive to such large amounts of tractor trailer traffic. The parcel would be better used for a smaller business. I also read the old waybest chicken property has been sold. Making that an opportunity for more tractor trailer traffic on Rt. 5. Please we do not need more commerce of this kind in our town. When is enough? I moved to this area because of it's small safe quiet neighborhood. Ellington Rd. Rt. 5 is a nightmare in morning traffic. Pleasant Valley Rd. is a pothole disaster all the way down. Governors highway is not built for this increase in trucks. Just say 'No'

Thank you once again, Deborah Beacham

Oneil, Caitlin

From: Lipe, Michele
Sent: Tuesday, February 22, 2022 8:38 AM
To: Oneil, Caitlin
Subject: FW: [External]Form submission from: Minutes and Agendas Comment Form

From: Jesse Giammarino via Town of South Windsor CT <cmsmailer@civicplus.com>
Sent: Monday, February 21, 2022 7:40 PM
To: Lipe, Michele <Michele.Lipe@southwindsor-ct.gov>
Subject: [External]Form submission from: Minutes and Agendas Comment Form

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.

Submitted on Monday, February 21, 2022 - 7:39pm
Submitted by anonymous user: 2600:8805:d085:5800:477:d77a:5b7d:295
Submitted values are:

Subject: Planning and Zoning Commission
==Please provide the following information==

Your Name: Jesse Giammarino
E-mail: j.giammarino@me.com
Phone Number: 8602090723

==Address==

Street: 139 Judy Ln
City: South Windsor
State: Connecticut
Zipcode: 06074

Minutes or Agendas? Agendas

Comments:

Hello,

I am writing in opposition to the project trying to pass at 25 Talbot Lane. This property should not be allowed as it seems to be a freight/ distribution facility and not a warehouse as the owner is trying to convince the Town. This property is not appropriate operating 24/7 within a residential neighborhood. It will cause property value loss, potential flooding by water displacement, excessive noise after hours, damage to public roads, ie Governors Highway, not suitable with South Windsor tax payers footing the bill to repair and maintain, and health risks from excess emissions. There have been enough opposition to this and did not pass the planning and zoning the first time. The property in question is four parcels, not one. I have heard there are also easement issues with the MDC and a possible discrepancy with the town still owning an old roadway passing through. Please stop this from going any further.

The Giammarino's
Attachment:

The results of this submission may be viewed at:
<https://www.southwindsor-ct.gov/node/97133/submission/53266>



Hartford Audubon Society

P.O. Box 270207, West Hartford, CT 06127-0207

Facebook: Hartford Audubon Society, Inc.

www.hartfordaudubon.org

February 21, 2022 (sent by email)

Mr. Bart Pacekonis, Chairman, South Windsor P&Z
1540 Sullivan Avenue
South Windsor, CT 06074

Dear Chairman Pacekonis, P&Z Commissioners, and Town Planner Lipe,

I am writing on behalf on the Hartford Audubon Society, Inc., which is a vibrant, all-volunteer conservation organization in Hartford County. We own and manage the HAS nature preserve at 621 Main Street, known as "Station 43". The preserve is located in the Connecticut River flood plain and is one of the most productive inland bird watching sites in Connecticut. It is also a Special Focus Area of the Silvio Conte National Fish and Wildlife Refuge. Ten Endangered, nine Threatened and nine Special Concern bird species have been reported there, among 229 total bird species.

Station 43 comprises 9.1 acres of shallow pond and marsh, bordered by over 400 acres of wetland, meadows, and active farmland on our south, west, and north boundaries, and by 100 acres of wooded higher ground to the east. The trail entrance for the property is directly opposite where Newberry Road intersects with Main Street.

We are writing to express our serious concern about the potential for increased stormwater drainage from the proposed new development at 25 Talbot Lane, Application 21-01P. The extensive impervious surface proposed for the development, coupled with the limited on-site stormwater detention areas, could adversely affect our preserve. We ask the commission to carefully examine the developer's revised stormwater management plan and ensure that there will be no net increase in discharge from their property.

We thank you for your careful review of this application.

Annette Pasek
President, Hartford Audubon Society, Inc.

Oneil, Caitlin

From: Lipe, Michele
Sent: Tuesday, February 22, 2022 10:10 AM
To: Oneil, Caitlin
Subject: FW: [External]Form submission from: Minutes and Agendas Comment Form

Did we receive this?

From: Lawrence Waksman via Town of South Windsor CT <cmsmailer@civicplus.com>
Sent: Friday, February 11, 2022 11:34 AM
To: Lipe, Michele <Michele.Lipe@southwindsor-ct.gov>
Subject: [External]Form submission from: Minutes and Agendas Comment Form

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.

Submitted on Friday, February 11, 2022 - 11:34am
Submitted by anonymous user: 2600:387:f:4314::a
Submitted values are:

Subject: Planning and Zoning Commission
==Please provide the following information==

Your Name: Lawrence Waksman

E-mail: l.waksman@cox.net

Phone Number: 8603353736

==Address==

Street: 190 Debbie Drive

City: South Windsor

State: Connecticut

Zipcode: 06074

Minutes or Agendas? Agendas

Comments:

As a resident in favor of prudent economic development in town, I stand strongly against the proposed development at 25 Talbot Lane. There would be too much noise and large amounts of truck traffic added to our local roads, and more critically, these would significantly affect the residential area abutting the site.

My home is about 3 miles from I-84, yet I can hear traffic noise on most days, especially if it's overcast. I can only imagine the impact of the noise of trucks pulling in/out or backing up only a few dozen yards away from my home.

I hope the PZC will strongly weight the concern for nearby residents as you consider the net effect of the planned development. Our town's residents should be the priority. Thank you for your consideration.

Attachment:

The results of this submission may be viewed at:
<https://www.southwindsor-ct.gov/node/97133/submission/53051>

Oneil, Caitlin

From: Lipe, Michele
Sent: Wednesday, March 2, 2022 4:30 PM
To: Oneil, Caitlin
Subject: FW: [External][Town of South Windsor CT] 25 Talbot Lane warehouse (Sent by Diana Rose Vandermark, Diana.rose61@yahoo.com)

From: Contact form at Town of South Windsor CT <cmsmailer@civicplus.com>
Sent: Wednesday, March 2, 2022 4:11 PM
To: Lipe, Michele <Michele.Lipe@southwindsor-ct.gov>
Subject: [External][Town of South Windsor CT] 25 Talbot Lane warehouse (Sent by Diana Rose Vandermark, Diana.rose61@yahoo.com)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.

Hello mlipe,

Diana Rose Vandermark (Diana.rose61@yahoo.com) has sent you a message via your contact form (<https://www.southwindsor-ct.gov/user/426/contact>) at Town of South Windsor CT.

If you don't want to receive such e-mails, you can change your settings at <https://www.southwindsor-ct.gov/user/426/edit>.

Message:

My name is Diana Rose Vandermark and I've lived at 694 Governors hwy for 60 years. I am opposed to this warehouse being built on our residential street.

I would like this email read out loud at the March 8th meeting please

Oneil, Caitlin

From: Lipe, Michele
Sent: Tuesday, March 8, 2022 11:06 AM
To: Oneil, Caitlin
Subject: FW: [External]Form submission from: Minutes and Agendas Comment Form

From: Dan Czaja via Town of South Windsor CT <cmsmailer@civicplus.com>
Sent: Tuesday, March 8, 2022 11:02 AM
To: Lipe, Michele <Michele.Lipe@southwindsor-ct.gov>
Subject: [External]Form submission from: Minutes and Agendas Comment Form

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.

Submitted on Tuesday, March 8, 2022 - 11:01am
Submitted by anonymous user: 2600:8805:d080:11:dc59:e643:a4be:b65b
Submitted values are:

Subject: Planning and Zoning Commission
==Please provide the following information==

Your Name: Dan Czaja

E-mail: mapman74c@gmail.com

Phone Number: 860-918-6284

==Address==

Street: 3 Barbara Rd

City: South Windsor

State: Connecticut

Zipcode: 06074

Minutes or Agendas? Agendas

Comments: I am writing to the Planning and Zoning commission to voice my disapproval of the yet again proposed warehouse project at 25 Talbot Ln (22-01P). This project is an inappropriate use of this land that will most certainly destroy the property values of the residents in the surrounding area due to its massive size and proximity. There are plenty of other places in town where this warehouse can be built that won't affect the residents and will have much better access to the highway system. It's shameful that somebody would even consider to do this project and hurt people in this way.

Attachment:

The results of this submission may be viewed at:

<https://www.southwindsor-ct.gov/node/97133/submission/53546>

Oneil, Caitlin

From: Lipe, Michele
Sent: Tuesday, March 8, 2022 10:52 AM
To: Oneil, Caitlin
Subject: FW: [External]To be read at the 3/8/2022 P&Z hearing

From: Rui Costa <RACC48@hotmail.com>
Sent: Tuesday, March 8, 2022 10:41 AM
To: Oneil, Caitlin <Caitlin.Oneil@southwindsor-ct.gov>; Lipe, Michele <Michele.Lipe@southwindsor-ct.gov>
Cc: Rui Costa <racc48@hotmail.com>
Subject: [External]To be read at the 3/8/2022 P&Z hearing

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.

Hi Caitlin & Michele,

I am submitting the below statement to be read into the record this evening at the 3/8/2022 P&Z hearing. Please confirm that you have received this email.

Thank you,
Rui Costa
152 Edgewood Drive

I would like to start by thanking this commission for all of your hard work, dedication, and due diligence, particularly as it relates to this application.

Section 4.5.1

*"The purpose of the Industrial Zone is to afford South Windsor areas reserved for industrial uses, which constitute well-planned, functional, and aesthetically pleasing environments for a prosperous industrial community; **and which, by design, are compatible with abutting zones and uses.**"*

Nothing about this design is compatible with the abutting industrial properties, and it is certainly not compatible with the abutting residential properties. This application does **NOT** meet the criteria set forth by this regulation

Section 6.4.3B

*Minimum parking spaces required: (Warehouses) 1 space per 1,250sq/ft **PLUS** 1 space **PER EMPLOYEE.***

In multiple sections of this chart, when the minimum parking standards are determined by number of employees "during the largest shift", that requirement is specifically noted. In the section labeled "warehouses" it implicitly states "1 parking space **PER EMPLOYEE**". There is nothing either expressed nor implied, that limits this requirement to "number of employees per shift".

Per the applicant's fiscal impact analysis, they claim that this facility will create 408 new jobs (and that was a conservative estimate). That would require a **minimum** of 695 parking spaces. This application does **NOT** meet the criteria set forth by these regulations

Section 4.5.6 Paragraph 4

"Service areas and loading docks must be screened from public streets and residential areas."

The loading docks proposed in this application are not screened from the abutting residential properties on Edgewood Drive, nor are they screened from Talbot Lane.

This application does **NOT** meet the criteria set forth by these regulations

Section 6.4.8

"Loading docks shall not face a public highway."

According to Mariam Webster, a highway is defined as "a public way".

Talbot lane by definition is a "public way". All of the loading docks in this application face Talbot Lane. This application does **NOT** meet the criteria set forth by these regulations.

Section 4.1.5

"On-site queuing provisions must be adequate to prevent site generated traffic from queuing on public streets"

I have been in the trucking and logistics industry for 18 years where I've held, and currently hold, a class A CDL.

The proposed truck queuing shown on this application will create bottlenecking which will force drivers to cue on public roadways. When drivers show up hours in advance of their scheduled pick-up times, they will park on public roads. When drivers are unloaded and are waiting for their next assignment, they will park on public roads. The site traffic plan does not provide adequate and sufficient room for tractor trailers to maneuver safely to and from the designated queuing area.

In addition, once this facility is operational, there is little to nothing that can be done to stop the "tenant" from using that queuing area as trailer storage which would further decrease the amount of queuing space, and further increase the use of Town owned roads for queuing. This application does **NOT** meet the requirements set forth by these regulations.

Section 4.1.5

"Delivery areas must be located so that normal operations are not impeded or compromised."

Section 6.4.8B Paragraph 3

"Sufficient on-site vehicular maneuvering area must be provided..."

*"Access/egress for loading areas shall be designed to provide adequate, **safe maneuvers** in a manner that does not compromise the efficiency and safety of parking areas".*

Drivers will be forced to blind side back into many of the proposed parking spaces. Avoiding blind side backing is something that is drilled into new drivers during training because these types of maneuvers are extremely dangerous. When performing a blind side back, the visibility of the trailer is reduced to near zero! These types of facilities are typically designed to strategically eliminate the need for blind side backing. This site plan does not provide adequate and sufficient room for trucks to maneuver efficiently or **safely** into parking spaces or

around the site. This inefficiency will cause bottlenecks and create dangerous traffic flow situations. Adding a "queuing area" does not mitigate the risk or need for these maneuvers. This application does **NOT** meet the criteria set forth by these regulations.

Section 4.1.1A

"Freight terminals" require a special exception application.

Wikipedia defines a "Freight Terminal" as "a processing node for freight". If freight is processed (loaded or unloaded) **BY DEFINITION**, it is a **Freight Terminal**. If any portion of this building will be used to process freight (which is a main function of both warehouses and distribution centers), it is considered a freight terminal and does not qualify for a site plan approval. On various occasions the applicant has submitted documents to show why they believe this is not a "truck terminal", but has failed to provide any concrete evidence to support that this facility or any part thereof, is not a **Freight Terminal**. This application does **NOT** meet the criteria set forth by this regulation

This commission has received numerous studies that have shown the negative mental and physical health impacts that constant noise and diesel exhaust particulates have on the general public, specifically children. In addition, there is nothing in this application that will prevent any child in the surrounding neighborhoods from wandering onto this site. This poses a major risk to children being seriously injured or killed by truck traffic, vehicular traffic, or heavy equipment on site. Another risk, is the very real possibility of a wandering child drowning in the proposed retention pond.

Any regulations set forth by this commission, or lack thereof, are super ceded by CT state law.

Connecticut State Law

Section 53-21(a)(1)

Forbids (a) *Any person who (1) willfully or unlawfully causes or permits any child under the age of sixteen years to be placed in such a situation that the life or limb of such child is endangered, **the health of such child is likely to be injured** or the morals of such child are likely to be impaired, **or does any act likely to impair the health** or morals of any such child*

By approving this application, the town of South Windsor, and the applicant are knowingly, willingly, and unlawfully placing all of the children in the surrounding neighborhoods in a situation where their life, mental, and physical health **WILL** be placed in danger. Careful consideration should be taken into account regarding these child endangerment laws.

This application, much like the original application, does not meet the planning and zoning regulations for the Town of South Windsor and I urge this commission to continue to scrutinize this application and vote NO. The continuous regurgitation of inaccurate and misrepresented figures and reports are specifically designed to fit the applicant's narrative. No leniency or exceptions should be made to enable this type of facility to move forward. I would be more than happy to answer any questions that the commissioners may have. I thank you all for your time and I strongly oppose this application!

Richard Delhaie
95 Cody Circle
South Windsor, CT 06074
March 7, 2022

Planning and Zoning Commission
Town of South Windsor
1540 Sullivan Avenue
South Windsor, CT 06074

Dear Planning and Zoning Commissioners.

I would like to state that I, like Commissioner Wagner, feel the town regulations require this proposal to proceed through the subdivision process. These four Industrial properties were deliberately created through the subdivision process. These four properties are not the same as their sum. Small (four acres and less) Industrial properties are populated by completely different businesses than massive 30-acre properties. These small businesses are generally machine shops, fabricators, and other technical specialists, which require a skilled workforce of highly trained employee, not unlike the many current Governors HW and Nutmeg Rd companies who have submitted letters of concern and opposition to this development. The current three small Industrial subdivision lots were designed to attract businesses with skilled jobs complementary to the unskilled positions common to larger industrial sites ensuring the town a diverse employment base. Merging these properties without the subdivision process arbitrarily rescinds this past planning. This would eliminate the opportunity to bringing skilled, knowledge-based jobs to South Windsor and replacing them with only the already plentiful warehouse associate position.

The South Windsor Subdivision Regulations defines a resubdivision by whether a change in a map of an approved or recorded subdivision or resubdivision "affects any area reserved thereon for public use" (p10). The proposed 25 Talbot development abuts two town Subdivision Open Space Lots (70 Cody and RO16 Edgewood), which are "reserved for public use and enjoyment". Merging these lots clearly affects these public areas in the same manner that drives the broad neighborhood opposition. Changing the current configuration to a massive 30-acre lot would allow for a much larger and harsher development with its more severe noise, air, and visual pollution. As property owners, if consolidating lots behind your own houses had the potential to double or tripled the size of an adjacent development would you feel affected? Of course, you would, just as this merging parcels affects the town's open space. Please consider these points for future applications on the site.

Respectfully,
Richard Delhaie

Infrastructure, Safety, Fairness and Economics all point to NO for the Mega Warehouse.

My name is Kathy Ryan. As the property owner of 455 Governor's Highway, and part owner of RYAN Business Systems, Inc. – a South Windsor taxpayer, since 1986 - I cannot overstate the negative impact that the proposed mega warehouse/truck terminal will have on my property, our business and other businesses, on our neighbors, and on the Town of South Windsor.

Infrastructure: Plain and simple, Governor's Highway is not built to accommodate the truck traffic that is proposed. Putting hundreds of tractor trailers a day on Governor's Highway is a recipe for disaster. Please consider all of the following - the limited width of the road, the inability to turn, the impact on all businesses as these trucks make their way through, but most importantly, think of the intersection with Route 5 and the railroad tracks near that intersection. Turns from Governor's Highway onto Route 5 and turns from Route 5 onto Governor's Highway, can in no way handle this volume. It would be a mistake to think otherwise.

Safety. Governor's Highway, a narrow two-lane road with hundreds of trucks a day? Joggers, walkers and cyclists would all be at great risk with this type of traffic.

Economics. Our business and property will be negatively affected. Residential homes will also be negatively impacted (down go the property values), as will the Town of South Windsor as it loses its attractiveness for residential buyers in favor of mega warehouses. This is a bad economic equation for the Town of South Windsor, area businesses, and residents.

Fairness. Finally, and most importantly, it is so incredibly wrong to subject the long-time residents and taxpayers to such a massive structure that will negatively impact their quality of life, not to mention the upset to the ecosystems on that land - - the 24/7 noise and light pollution, the exhaust fumes, the encroachment on property lines, to name just a few. It's just the wrong thing to do.

The mega warehouse facilities on Route 30 have forever changed that route and the surrounding residential areas, and not for the better.

Please do the right thing and vote NO to subjecting Governor's Highway and the abutting neighborhoods to the same demise.



EXHIBIT K

James M. Connor
(t) 860.548.2617
(f) 860.548.2680
jconnor@uks.com

MEMORANDUM

TO: South Windsor Planning and Zoning Commission

FROM: James M. Connor, Esq.
Updike, Kelly & Spellacy, P.C.

RE: Absence of Public Sidewalk Requirements in the I – Industrial Zone

DATE: March 8, 2022

There is nothing in the Zoning Regulations that requires creation of a public sidewalk along either of the site's street frontages. The analysis begins with the recent history of regulations amendments on the subject of sidewalks.

The South Windsor Plan of Conservation and Development (POCD) adopted in July 2013 has several strategies to improve pedestrian and bicycle options. The implementation part of the POCD and the updates of that document indicate which strategies are intended to be implemented through a regulatory approach rather than as public works projects. The revisions tables of the Zoning Regulations and the Subdivision Regulations each record changes following adoption of the POCD involving sidewalks. The Subdivision Regulations are not relevant to this application.

Section 6.7 of the Zoning Regulations, "Pedestrian and Bicycle Accommodations," was added in 2017. This is applicable in the I – Industrial Zone. Other provisions of the Zoning Regulations dealing with sidewalks are applicable only in particular zones, other than the I Zone, or deal with separation of certain design features from "public sidewalks."

Section 6.7 contains mandatory language as follows:

Access to individual buildings within the site shall be from a system of convenient and safe pedestrian ways and shall be incorporated into the plans for any site development plan or parking area in accordance with the following standards: . . .

Updike, Kelly & Spellacy, P.C.

Goodwin Square • 225 Asylum Street 20th Floor • Hartford, CT 06103 (t) 860.548.2600 (f) 860.548.2680 www.uks.com

The phrase “within the site” appears to modify “access” not “buildings” and to exclude a requirement of providing access from elsewhere. However, of the seven “standards” that follow, only four use the mandatory “shall,” including the last, the only one dealing with “public sidewalks,” which provides:

7. Pedestrian ways and sidewalks may be provided wherever possible for connections to adjacent lots (developed or undevelopable) or neighborhoods. Maintenance of public sidewalks, including the clearing of snow, shall be the responsibility of the property owner. Pedestrian ways internal to the site should connect to the public sidewalk at the street.

“May” and “should” typically are not construed as mandatory. In the minutes of the meeting of the PZC where the new section was adopted in November 2017, this provision was paraphrased in the staff report in these words:

Pedestrian standards addresses adding walkways from parking areas into buildings and also the design of walk ways to ensure that they provide maximum safety. The regulation encourages the incorporation of decorative materials, raised paver, and/or pavement markers to delineate walk ways and the use of signage as appropriate. There are also provisions requiring interconnection to adjacent lots, where appropriate, as well as providing a connection to a public sidewalk *when available*.

Emphasis added. In addition, the staff report on the new regulations characterizes the relationship between the POCD and the proposed regulations thusly:

In the Transportation section of the Plan of Conservation and Development, one of the goals, Implement More Biking and Walking Options, states: The zoning regulations could be updated to require new commercial development to provide pedestrian infrastructure and bicycle parking *if located in priority areas*. Existing commercial development should be encouraged to make improvements to better attract pedestrian and bike traffic. This text amendment will forward this goal.

Emphasis added. Note that the goal described concerns commercial development, not industrial. Further, Governor’s Highway and Talbot Lane are not priority areas for pedestrian infrastructure in the POCD. The sole commissioner comment noted in the minutes was the following:

Commissioner Wagner spoke in support of the amendment and asked if it was the right place to require new subdivisions and commercial properties to provide bike paths. Director Lipe indicated that language had already been added to subdivision regulations.

This question did not directly relate to public sidewalks. It is possible that the minutes do not exactly reflect Commissioner Wagner’s question or the Director’s reply; the actual subdivision regulations amendments dealt primarily with sidewalks, not bike paths.

Chapter 4, Section C.3(f) of the Subdivision Regulations was amended in June 2017 with new sidewalk requirements. Currently, the regulation states among other things that “Sidewalks may be required in non-residential subdivisions, and on existing streets in accordance with the Town Sidewalk Plan section of the Town Plan of Development.” The subdivision regulations do not apply to the proposed site plan application. However, the key point is that these regulations were amended only about six months prior to the amendment that added Section 6.7 to the Zoning Regulations and were done by the same body acting in its legislative capacity (albeit with an election and change in the chairmanship having occurred between the two). Clearly, the PZC knows what language to use if it intends to make installation of new sidewalks along public streets mandatory, but only used that language in the amended Subdivision Regulations and limited the requirement to locations identified for that purpose in the POCD, which does not apply to Governor’s Highway or Talbot Lane.

The Zoning Regulations use the term “walkways” in appropriate circumstances where the concept is not that of a hard pedestrian amenity alongside a public or private street. In various contexts, the Zoning Regulations use both the phrase “public sidewalk” and “public walkway,” thereby recognizing a distinction between interior development features and features dedicated to public use. The Zoning Regulations also use the term “pedestrian ways,” but never “public pedestrian ways,” often in connection with parking lot design requirements and in distinction from “sidewalks.” “Pedestrian crossing” and “crosswalk” are also terms used in various contexts. “Walkway” may be an umbrella term for all interior pedestrian features whether constructed from concrete, pavers, or asphalt, and inclusive of pedestrian crossings/crosswalks in some contexts.



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EXHIBIT L

CIVIL & TRAFFIC ENGINEERS / LAND SURVEYORS / PLANNERS / LANDSCAPE ARCHITECTS
Serving Connecticut, Massachusetts, & Rhode Island

**25 Talbot Lane Warehouse & Distribution Center
Zoning Compliance Narrative
Planning & Zoning Commission Site Plan Application**

5 & 25 Talbot Lane and 475 & 551 Governor's Highway
South Windsor, Connecticut
Application 22-01P
DPI Project No. 1976.U
March 8, 2022

The undersigned offer the following narrative to demonstrate compliance of the above-referenced site plan of development with the Town of South Windsor Zoning Regulations, Originally Effective March 7, 1938 and Revised Through December 6, 2021:

Section 2.8 – Corner Visibility

There are no fences, berms, structures, existing vegetation, or proposed plantings more than 3 feet in height within the triangle formed by the intersecting pavement lines of Talbot Lane and Governor's Highway and the straight line adjoining said pavement lines at points which are 50 feet distant from the point of intersection. The point of intersection is drawn tangent to the existing curb radius for both streets.

Section 2.11 Commercial and Industrial Storage and Display

There is no outdoor storage or display proposed.

Section 2.16 Location and Screening of Ancillary Structures

Proposed trash storage units, dumpsters, air-conditioning units, and similar devices observe required yard setbacks and no rooftop units are proposed on the building.

Section 2.18 Performance Standards – All Zones

All discharges of wastes, chemicals, and other substances are required to be in compliance with Federal, State, and local laws and regulations.

Section 2.21 Waiver Criteria

No waivers are being requested.

Section 2.22 Fencing on Commercial/Industrial Sites

Gates are proposed throughout the tractor-trailer entrance and tractor-trailer court and at each end of the emergency access drives for the control of traffic flow and is in accordance with requirements for materials, height, setbacks and screen requirements. No other fencing nor any barbed wire is proposed.

Table 4.1.1A Permitted Commercial and Industrial Uses

Warehouses and Distribution Centers are permitted uses in the Industrial Zone.

Section 4.1.5 Traffic Requirements

Please see letters dated February 4, 2022 from Langan and February 8, 2022 from F.A. Hesketh & Associates, Inc.

Table 4.1.6A Commercial and Industrial Area, Density and Dimensional Requirements

The site plan of development conforms with all area, density and dimensional requirements of the Zoning Regulations.

Section 4.5.3 Accessory Uses

No accessory uses are proposed.

Section 4.5.4 Storage of Materials

No outdoor storage of materials is proposed.

Section 4.5.5 Accessory Uses

No rail spurs are proposed.

Section 6.1.2 B Applicable Regulations – Commercial and Industrial Development

The on-site improvements have been designed in accordance with acceptable engineering standards. The drainage facilities have been designed in accordance with the Town of South Windsor Public Improvement Specifications and are consistent with similar developments reviewed and approved by the Town of South Windsor. The drainage facilities have also been designed following the guidelines of the 2004 Connecticut Stormwater Quality Manual as published by the Connecticut Department of Energy and Environmental Protection.

Section 6.1.3 Off-Site Improvements

No physical off-site improvements are proposed. The traffic engineer has identified potential traffic signal timing changes that ConnDOT could adopt to improve the level of service at the intersection of Route 5 and the Governor's Highway, if they so desire.

Section 6.1.4 Natural Landscape Features

The plans preserve existing trees not required to be removed by the building construction or public improvements within the 50 feet adjacent to the eastern and southern property lines. A proposed permanent Conservation / Buffer Easement will encompass this area as well as the landscaped berm to offer further protection of these natural features.

Section 6.1.5 Traffic and Circulation Considerations

Please see letters dated February 4, 2022 from Langan and February 8, 2022 from F.A. Hesketh & Associates, Inc.

Section 6.2.1 General Landscape Standards

A landscape plan has been provided showing all areas not covered by impervious surfaces will be covered by lawns, nursery-grown trees and shrubs, and natural vegetative seed mixes, with the exception of the existing trees to remain and the surface water quality basin. Plants considered invasive by the Connecticut DEEP have not been specified. The site landscaping has been designed in accordance with Section 8.7 of the Regulations and has been designed to maximize site compatibility with the surrounding neighborhood with the inclusion of the double row of evergreen trees placed on an earthen berm. The stormwater detention basin will not be visible

from any streets. Existing trees of 18 inch caliper and larger were survey-located and are shown on the site plans. The existing trees within 50 feet of the eastern and southern property lines will be preserved. All trees to remain undisturbed have been shown on the site plans and will be identified in the field prior to the commencement of site work.

Section 6.2.4.B. Buffers – Standards and Design

The proposed buffer including 50 feet of existing mature vegetation to remain and 40 to 45 feet of additional planted berm has been designed by a licensed landscape architect in the State of Connecticut along the entire length of property lines that abut a residential zone. The six-foot high earthen berm planted with a staggered, double row of evergreen trees will visually obscure the activity on site within five years so that the activity is not immediately apparent to the abutting lots. The growth of these trees, in addition to the continued establishment of the existing mature vegetation, will also substantially obscure the field of view onto the subject site at maturity of the planting. The applicant is providing the required buffer on their side of the zone line in addition to lengths of planted earthen berm along the street frontage to enhance the screening of the site activity. A proposed permanent Conservation / Buffer Easement will encompass this area as well as the landscaped berm to offer further protection of these screening elements. All required yards are observed in addition to the 50 feet of required buffer.

Section 6.2.4.C. Buffer Widths

A buffer width of 50 feet is provided on the site development plans for the Industrial zone. On the enclosed Erosion & Sedimentation Control Plans, the construction and establishment of the planted earthen berm will occur in Phase Two of Construction, only to be preceded by the construction and establishment of the site's stormwater management basin. The existing mature vegetation will be preserved and protected at all times throughout the length of construction and within the permanent Conservation / Buffer Easement.

Section 6.2.4.F. Alternative Buffer

The landscape plan shows an alternative buffer that includes evergreen tree plantings and an earthen berm as previously described that meets the performance standards of buffers as outlined above.

Section 6.3.2 Illumination Standards

All exterior lights have been designed as to prevent direct or objectionable glare or light trespass, are shielded to the extent possible, and are contained in the target areas. The lights are positioned or contain house-side shields so that no direct light source shall be visible at the property line. Poles are spaced to employ soft, transitional light levels that are consistent from area to area and to minimize contrast between lit areas and dark surroundings.

Section 6.3.3 Light Pole and Fixture Standards

Maximum height of luminaires, both pole-mounted and building-mounted, are a maximum of 25 feet above grade and are a minimum of 14 feet from property boundaries at the closest point. Lighting does not shed more than .25 foot-candle over any property line as indicated by the photometric calculations shown on the lighting plans. A variety of full cutoff type fixtures, fully shielded/recessed fixtures, and top downward fixtures are proposed to accomplish effective, safe, and compliant light levels. No floodlights are proposed.

Section 6.3.5 Prohibited Lighting

No laser-source lights, high-intensity lights, search lights, flashing, or blinking lights are proposed.

Section 6.3.6 Hours of Operation

All site lighting will be reduced through the use of dimmers, timers, and motion detectors after the close of business.

Section 6.4.1 Parking and Access - Purpose

The site design, parking layout and configuration, traffic circulation within the site, the number and location of access points, and the traffic circulation on adjacent roadways has been designed to ensure public safety and welfare is promoted. Separate entrances are shown for tractor-trailer and automobile traffic. Additional signage is proposed to direct tractor-trailer traffic away from the residential area east of the site.

Section 6.4.3 Minimum Number of Parking Spaces

A breakdown of the required parking spaces has been provided on sheet C-OS1 for the office and warehouse portions of the building. A total of 410 parking spaces are required for this application. A total of 466 spaces are provided, including 318 automobile parking spaces, 56 trailer spaces, and 92 'reserve parking' spaces.

Section 6.4.4.C Reserve Parking

92 'reserve parking' spaces are proposed as the minimum number of parking spaces required is excessive and unnecessary given the number of employees that will be present during the largest shift. The 'reserve spaces' shown on the site plan have been included in the impervious coverage calculation.

Section 6.4.4.G. Off-Street Parking – General Provisions – Handicapped Parking

A total of 8 accessible parking spaces are provided based on the requirements of the Connecticut General Statutes for 318 parking spaces. These spaces are located near the main pedestrian entrance along the northeast corner of the building.

Section 6.4.4.H. Off-Street Parking – General Provisions – Emergency Access Ways

The site circulation provides for circulation of emergency vehicles around the entire perimeter of the building and will be subject to review by the South Windsor Fire Marshal.

Section 6.4.4.I. Off-Street Parking – General Provisions – Perimeter Circulation Road

Two separate parking lots in the amount of 144 parking spaces and 174 parking spaces respectively are provided on site, and therefore, no perimeter access road is required.

Section 6.4.5 Design of Parking Areas

No passenger or truck parking areas are proposed in required yards and the minimum required driveway width of 24 feet is maintained on site. Some driveways exceed the minimum requirement at 30 feet wide. No individual parking spaces are directly accessed from the two main driveways on site (one connecting to Governor's Highway and one connecting to Talbot Lane). Due to the low-turnover nature of this parking lot, single striping on the proposed parking spaces is permitted and provided on site.

Section 6.4.6 Parking Lot Landscaping

Perimeter landscaping is provided around all parking areas in excess of 1 tree or 2 shrubs for every 3 perimeter parking spaces in between the parking lots and the closest property lines. Terminal peninsulas and mid-bay islands all have a minimum dimension of 8 feet and contain at least 1 tree.

Landscaping is also required at a minimum of 10% of the interior parking area with a minimum of 1 tree for each 10 parking spaces. A total of 10.7% of the interior parking area is landscaping with 34 trees for the 318 parking spaces. The provided Landscape Planting Schedule states that proposed deciduous trees are a minimum of 2" caliper. Potential snow storage areas are shown throughout the site on the Landscape Plans.

Section 6.4.8 Off-Street Loading:

The number of loading docks is provided to accommodate anticipated loading requirements of building users, in accordance with industry practice. The loading docks are designed as an integral part of the building and do not adversely impact the site and building aesthetics. The loading docks do not face the abutting residential uses through placement of said docks on the western face of the building and are screened from public highways. Sufficient on-site vehicular maneuvering is provided in such a way that there are no necessary or allowed maneuvering movements within the public highway or that would compromise the efficiency nor safety of parking areas.

Section 6.4.10 Minimum Number of EVSE Parking Spaces

Of the 318 provided parking spaces, 10% are required to be Level 2 EV Ready parking spaces. 34 parking spaces, or 10.7%, are highlighted as EV Ready on the plans. 3% of the total parking spaces shall be fully installed Level 2 Charging Stations. 10 spaces, or 3.1%, are designated to be fully installed at the time of construction, 2 of which are handicap restricted van accessible spaces.

Section 6.5.8 Signs in Commercial/Office/Industrial Zones

The proposed location for 2 building-mounted signs are provided along Talbot Lane and Governor's Highway at 148 SF each (total 296 SF). Per the maximum size requirement of 2 sq. ft. per linear foot of building frontage along both roads (1,254 LF total), the proposed signs are compliant with the regulations by not exceeding the total maximum size of 2,508 SF. There is also 1 free-standing sign at the site driveway on Governor's Highway that will not exceed 24 SF and 5' high or 12 SF and 10' high upon final design submittal to the Town along with the application for a Sign Permit.

Section 6.6 Utilities

All available public utility connections are made with underground services per local and state requirements, including potable water, fire protection with hydrants, sewers, drainage, electric, and gas. The proposed storm drainage system design is consistent with the Town Public Improvement Specifications, 2004 Connecticut Stormwater Quality Manual, and consistent with standard engineering practices.

Section 6.6 Solid Waste Disposal

A proposed dumpster is located on the concrete loading dock apron that is appropriately screened and conforms to all setback requirements.

Section 6.6.4 Spare Conduits

No spare conduits are proposed.

Section 6.6.5 Storm Drainage

The design of the storm water management system is consistent with the Town of South Windsor Public Improvement Specifications manual, in accordance with the 2004 Connecticut Stormwater Quality Manual guidelines, is consistent with good engineering practices and similar recently approved applications within South Windsor, is sealed by a licensed professional engineer, and is

based on environmentally sound site planning and engineering techniques. The Stormwater Management Report submitted with the application demonstrates a zero net increase of stormwater discharge peak rates to the Town's storm drainage system for the 2, 10, 25, 50, and 100 year storms. The vast majority of the site's storm water post-development will discharge to the west of the site where the water will travel through two off-site detention basins, in addition to the on-site treatment and attenuation, to further ensure there will not be an increase in deleterious downstream effects nor any impacts to receiving water bodies as a result of the proposed development. Existing flooding issues in Newberry Brook near Main Street will not be exacerbated with the development of this project, as confirmed by the Town Engineer's review of a previous application for this site with identical drainage characteristics. Stormwater flows requiring treatment will pass through a treatment train consisting of multiple primary and secondary water quality treatment practices in accordance with the 2004 Connecticut Stormwater Quality Manual. The water quality basin and forebay and the underground water quality treatments were sized to treat the flow/volume for a rain event 3.1 times larger than is recommended in the 2004 Connecticut Stormwater Quality Manual. Infiltration units are included in the storm water management system design, but due to the high water table on the site no credit for infiltration was taken in the sizing of the system. However, the system will allow for infiltration at times when the water table may be lower. Catch basins receiving storm runoff generated from parking and road pavements have sumps and trap hoods to initially treat runoff which is then further treated in extended detention basins and isolator units to remove more sediment, oil, grease, and other pollutants. An extended wet-bottom detention basin is included in the design to meter site-generated storm runoff prior to the discharge to off-site drainage systems and accommodates the four consolidated parcels that comprise this development. Existing storm drainage and maintenance easements in favor of the subject site are in place across the adjoining property to the west. The stormwater detention basin will not be visible from any streets.

Section 6.6.6 Water Supply

The site is within 200 feet of an existing public water supply and will connect to said system.

Section 6.7.2 Pedestrian Design Standards

Pedestrian crossings are demarcated with appropriate pavement markings to provide safe crossings for pedestrians through vehicular areas leading to sidewalks that provide separation from motor vehicle traffic. All pedestrian ways are a minimum of four feet wide with an extra two feet of width when adjacent to parking spaces. Flush sidewalks are provided where necessary to facilitate wheelchair access to the building. The proposed site lighting provides adequate light levels in the designated pedestrian walkways and parking areas. A sidewalk connecting the main building entrance to Governor's Highway has been provided, which could connect to a public sidewalk along Governor's Highway if it is constructed by the Town in the future.

Section 8.2 Zone Change, Special Exception, and Site Plan Standards and Procedures – General Application Standards and Procedures

The application is being made by property owner of record and Proof of Ownership was provided with the application. Appropriate application pending signs were posted on January 27, 2022, which was more than 10 days before the scheduled meeting. Signs were placed along Governor's Highway and Talbot Lane as required in a letter from the Town of South Windsor on January 26, 2022. Three copies of the completed application form signed by the applicant and owner have been provided along with the proper site plan fee and additional application requirements.

Section 8.5 Site Plan Standards and Procedures

Site plan approval is being requested as required for all uses in non-residential zones. The application includes a Key Map complying with Section 8.6.1 (see below) and a Site Development Plan complying with Section 8.6.2 (see below).

Section 8.6.1 Standards for Key Maps

Sheet C-T1 includes the required Key Map at a scale of 1"=200' showing the proposed site development and surrounding properties within 500'. A Zoning Data Table is included to identify the zone of the subject sites and size of property. The cover sheet includes the address of the sites, existing and proposed buildings, streets, and driveway cuts for the subject site and abutting properties. A table of Now/Formerly 500' Abutters is provided including street address, owner name, and parcel ID to help identify the location of the property on the Key Map and its corresponding zoning classification.

Section 8.6.2 Standards for Site Plans

The submitted Site Plan of Development has been prepared by professional land surveyors, civil engineers, landscape architects, and architects licensed to practice in the State of Connecticut. The following list is a summary of included Site Plan Contents as required in subsection 8.6.2.B that are not addressed in Section 8.6.1 above:

- The Titleblock on all sheets includes the owner and applicant entity and preparer.
- Appropriate drawing sheets are at a scale of 1"=40', with the exception of overall plans and surveys, and include a north arrow and corresponding professional seal and signature.
- A location map of the site and surrounding streets can be found on sheet C-T1 at a scale of 1"=1000'.
- Bearings and distances of the property boundary are provided on sheets V-1 and V-2 to A-2 standards.
- Existing and proposed contours at 1-foot intervals can be found on the Grading Plans.
- The proposed building footprint with dimensions, area, height, and distances to property lines can be found on sheet C-OS1 with the associated required, existing, and proposed Zoning Data Table of Area, Density, and Dimensional Requirements. This sheet, in addition to the 1"=40' Site Plans, include the location of existing and proposed sidewalks, curbs and curb cuts, and adjacent streets.
- Existing and proposed sanitary sewer facilities, water supply, electric and gas provisions can be found on the Utility Plans.
- Existing and proposed stormwater drainage facilities from the roof area, parking lot and driveways can be found on the Drainage Plans and are further described in the Stormwater Management Report.
- Soil erosion and sedimentation control measures can be found on the Erosion and Sedimentation Control Plans.
- Existing easements are depicted on sheets V-1 & V-2 and a table of proposed easements is provided on sheet C-OS1.
- Existing trees larger than 18" have been located to Class D standards on sheet V-3 and are depicted on sheet C-OS1.
- Proposed plantings including a schedule of species and sizes be found on the Landscape Plans.
- The Landscape Plans include typical cross sections of the buffer plantings and existing trees to remain demonstrating conformance with Section 6.2.4.C.

- The Site Plan sheets also include the layout of all 318 off-street parking spaces, aisles, driveways, loading docks, pavement markings, directional signage, and ground-mounted sign. The building-mounted signage is represented on the Architectural Plans and Elevations.
- Proposed outdoor lighting locations, fixture specifications, and photometric calculations for pole-mounted and building-mounted devices can be found on the Lighting Plans.
- “Emergency Vehicles Only”, “No Parking, Standing, Queuing”, and stop signs are provided as needed on the Site Plan sheets. In review of the previous site plan, no additional fire lanes or traffic control signs have been required by Police or Fire authorities.
- No outdoor storage areas are proposed.
- The location of the refuse container is shown on the site plan.
- The proposed connection to the public water supply system is shown on the utility plans.
- The development will be completely constructed within one phase of development, which will contain several phases of construction as outlined in the Erosion & Sedimentation Control Plans.
- A table showing the required and proposed dimensional requirements is shown on sheet C-OS1.
- Preliminary Architectural Plans and Elevations are provided at the end of the site plan set depicting the following:
 - Area and location of proposed office and warehouse uses;
 - Ingress and egress door locations;
 - Building height;
 - Materials and color finishes of the building exterior.
- The development of this site will not require direct access to State highways and/or State-owned storm drainage systems.

Section 8.7 Architectural and Design Review

The Architectural Design Review Committee gave a favorable review to a previous site plan application for this site with an identical building and substantially similar site layout, landscaping, and site lighting.

In summary, it is our professional opinion that the above-referenced site plan of development complies with all applicable requirements of the Town of South Windsor Zoning Regulations, Originally Effective March 7, 1938 and Revised Through December 6, 2021.

Respectfully submitted,
DESIGN PROFESSIONALS, INC.



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