Gonzalez, Sarah

From: Michele Paquette <paquet365@gmail.com>
Sent: Wednesday, May 14, 2025 8:24 PM
To: Lebowitz Paul
Cc: Valante, Michael; Laskin, Nicole; Injeski, Breanne; Bolton, John; Wistreich, Amy; Calise, Michael; Zucaro Patrizia; Cammeyer Michael; Cohn Neil; Planning and Zoning
Subject: Public comments about "The Hamlet" Parking

Dear Paul,

I support responsible development in Saugatuck, aligning with the TOD Master Plan Steering Committee's vision to **improve infrastructure, reduce congestion, and prevent additional vehicle burden** on Saugatuck Centre*. Therefore, I am deeply concerned about the ***size and high-density USE*** of the proposed development, and particularly the current **lack of a parking demand analysis.** This seems especially appropriate considering the large number of cars that are going to be adding due to this development.

As required by sub-section 24C-2, the applicant must provide a *parking demand* and supply report to demonstrate how on-site and railroad parking after 3PM will accommodate usage (Table 1). The applicant has provided required parking according to the text amendment yet no report to demonstrate the use of the RR parking nor parking demand. This leaves critical questions unanswered therefore the town residents and the P&Z are unable to appropriately understand and respond to this application. I respectfully request this application be declined if this information is not provided.

As you know, the applicant has provided the P&Z a traffic analysis and they have a preliminary 2024 market study which is referenced in their brownfield application to the State which highlights the need for 640 employees therefore they have a plan for the use of the development. In more detail, the traffic analysis (Table 4) has car trips generated therefore the parking demand must be known. Why are they not submitting a parking demand analysis? This is quite concerning.

The applicant has provided a plan which demonstrates how the 277** on-site parking spaces are to be used:

	Proposed Parking Supply by Applicant	Proposed use of RR parking	Parking Demand in P&Z documents	Employees in Brownfield application to the State
57 Residential units	96**	?	?	N/A
57 Room Hotel	43***	?	?	N/A
Black Duck	2.7**	?	?	N/A
Non-Residential spaces • 38 retail/restaurants • Spa	135.3	?	?	N/A

• Amenity/private recreational club • Barn				
Marina	0***	?	?	N/A
300-500 people with events	0 **	?	?	N/A
Employees	0***	?	62***	640

Another supportive point for a parking supply and demand analysis is that during the day railroad parking is not to be used before 3PM according to the text amendment YET the 38 retail/restaurants, spa, hotel, barn, amenity building and hotel will be in use and patrons will be coming and going all day long. The parking for the Black Duck is a great example of parking demand and supply. It received 2.7 parking spaces. The Black Duck is open for lunch, will 2.7 spaces meet the demand for this restaurant? Not based on its business today. Also, the traffic analysis demonstrates **343 cars will be leaving the property during weekday peak afternoon commuting time while 435 cars are coming into the development during the same time.** These numbers exclude the TOD credit since it is not zoned as a TOD and no plan has been provided to demonstrate the train will be used by patrons. **One of my greatest concerns is that the demand for parking by patrons will exceed supply and cause people to use railroad parking before 3pm, they could use daily permit spots or park in permit spots and there will be nothing left for commuters. What will prevent this?**

Next, the applicant has referenced using railroad parking on multiple occasions and cites they received the parking requirements in the text amendment because of the proximity to the railroad parking. I understand the patrons can use railroad parking after 3pm just like anyone else. In many of their documents (Traffic analysis, Jan, 2025 & Parking requirements 4/18/2025), the applicant references having 300 person events during the week after 3pm and 500 person events on the weekend. In addition, they have referenced using Lot 1 for events in the barn****. Yet, they have not demonstrated the availability of any railroad parking spaces after 3pm. **The police study shared in December 2024 showed availability from 5pm to after (Table 3).** This analysis demonstrates an average and is very generic. I am sure at 8pm the parking availability is very different than at 5pm so this detail is needed and not provided. They need to show that railroad parking would be available when they need it, in other words demonstrate how their on-site parking and railroad parking supply after 3pm would meet their event demands while they also have residential and commercial parking demands going on at the same time. **According to the text amendment 24C-13 (Table 2) the P&Z has the right to set the parking standards for events. The parking supply and demand study will help you make an informed decision about the impact of these events and how much parking you may need to require the development to have or not. It will be a useful tool for you.**

The next parking question is, **where will all the employees park?** The text amendment states **"The PMP shall also demonstrate to the satisfaction of the Planning and Zoning Commission that planning for employee parking on and/or off-site was considered will be reasonably addressed."(Table 2)** At this time, a request as a condition of approval was to create a plan afterwards. This is not acceptable. As you can see from the above chart, the applicant stated in their response to Readiness and Meade that their peak number of employees will be 62 yet in their brownfield application they expect 640 employees. What is the discrepancy? Where will these people park? Since our railroad parking permit system does not discriminate, these

individuals could easily buy a Westport railroad parking permit or use daily permit spaces when they are driving from another town to Westport to work for this private development. I respectfully ask the P&Z to not approve this application without an employee parking plan. And this plan must forbid the use of railroad parking for employees of this development.

And the parking questions continue, **should the developers get to use the 50% joint parking?** As you know, "The Planning and Zoning Commission may permit 50% Joint Parking, as defined in §34-8, for mixed retail, restaurant, hotel, residential, office use developments and all other permitted uses where peak hours and usage do not significantly conflict when an applicant demonstrates there will be no substantial conflict in the operating hours for which the Joint Parking facilities are proposed."(Table 2) Where is this plan?**** I have not seen any demonstration from a demand study that there will be no substantial conflict.

Finally, the quality of the RR parking data provided for the parking analysis needs to be addressed. The RR parking analysis looked at the second half of 2024, before many return to work mandates. **As the mandates have increased this year, the use of the RR parking lots have increased and will continue to increase as more mandates initiate in June, 2025**. And since the police do a **monthly parking survey (Table 3)**, I ask that the applicant use the most up to date information when they do the parking demand and supply study.

In conclusion, the current parking information provided is deficient because it:

- **Lacks clarity on how the demand for parking will be met by the supply, which is a requirement of the text amendment**
- **Lacks a plan for the 640-employee parking, which needs to be reasonably addressed according to the text amendment**
- **Lacks clarity on how the 300-person weekday and 500-person weekend event parking demand will be met by the supply; the P&Z can require more on-site parking to meet the demand**
- **Lacks justification for use of the 50% joint parking, which can be denied by the P&Z if this is not clear**
- **RR parking supply analysis is outdated; ensure up-to-date relevant data is provided**

I respectfully ask you to use these tools in the text amendment to get the information you need to make a good decision for this development and our beautiful town. I know the developers want to ensure the success as well, so why would they not supply the analysis and plans to get it right? If you don't get the analyses and plan's that are required, please decline this application.

THANK YOU SO MUCH for your undivided attention and dedication.

Sincerely,

Michele Paquette

7 Norport Drive

Saugatuck area of Westport

References

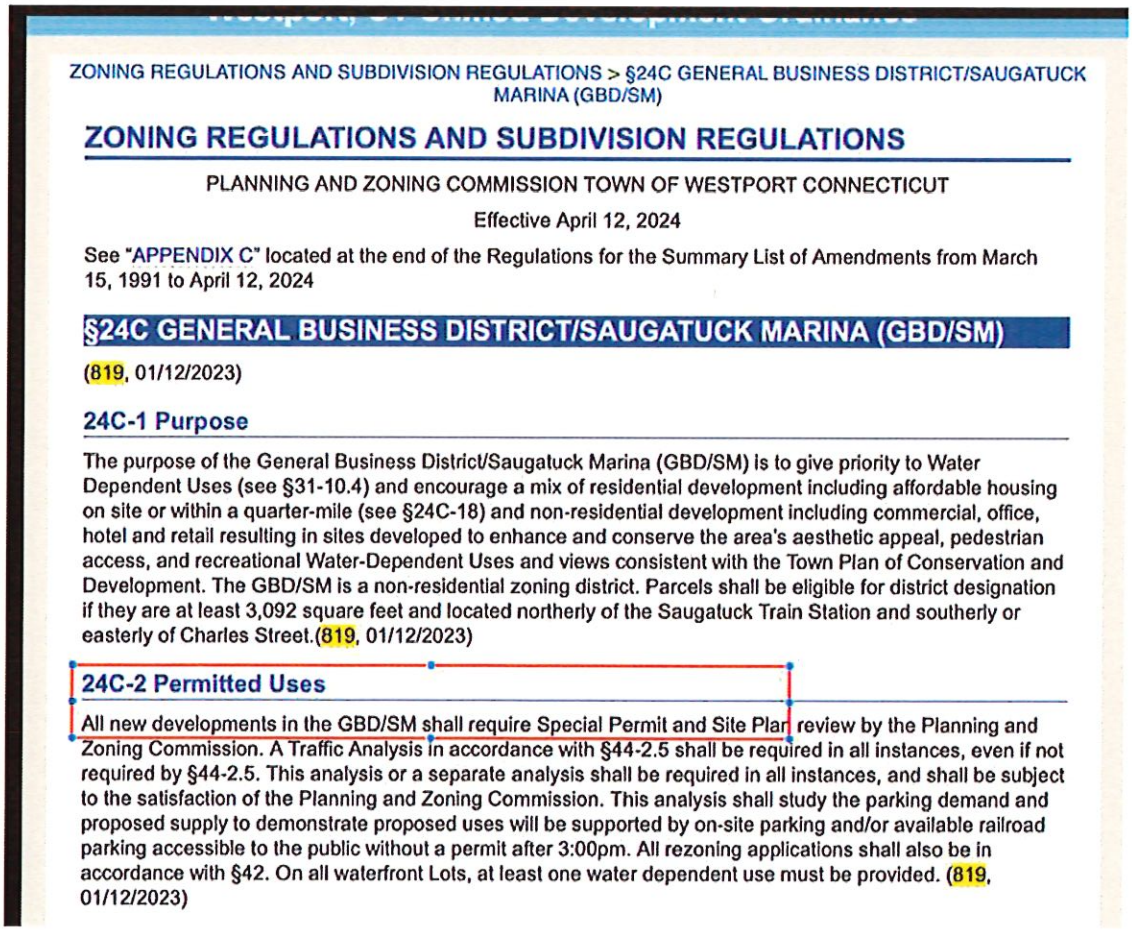
* Saugatuck TOD Master Plan Steering Committee | Westport, CT

**Parking Requirement analysis, 4/18/2025

***Landtech response to Readiness and Meade peer review, 4/18/2025

****March 20th, 2025 applicant report to Michelle Perillie

Table 1



ZONING REGULATIONS AND SUBDIVISION REGULATIONS > §24C GENERAL BUSINESS DISTRICT/SAUGATUCK MARINA (GBD/SM)

ZONING REGULATIONS AND SUBDIVISION REGULATIONS

PLANNING AND ZONING COMMISSION TOWN OF WESTPORT CONNECTICUT

Effective April 12, 2024

See "APPENDIX C" located at the end of the Regulations for the Summary List of Amendments from March 15, 1991 to April 12, 2024

§24C GENERAL BUSINESS DISTRICT/SAUGATUCK MARINA (GBD/SM)

(819, 01/12/2023)

24C-1 Purpose

The purpose of the General Business District/Saugatuck Marina (GBD/SM) is to give priority to Water Dependent Uses (see §31-10.4) and encourage a mix of residential development including affordable housing on site or within a quarter-mile (see §24C-18) and non-residential development including commercial, office, hotel and retail resulting in sites developed to enhance and conserve the area's aesthetic appeal, pedestrian access, and recreational Water-Dependent Uses and views consistent with the Town Plan of Conservation and Development. The GBD/SM is a non-residential zoning district. Parcels shall be eligible for district designation if they are at least 3,092 square feet and located northerly of the Saugatuck Train Station and southerly or easterly of Charles Street.(819, 01/12/2023)

24C-2 Permitted Uses

All new developments in the GBD/SM shall require Special Permit and Site Plan review by the Planning and Zoning Commission. A Traffic Analysis in accordance with §44-2.5 shall be required in all instances, even if not required by §44-2.5. This analysis or a separate analysis shall be required in all instances, and shall be subject to the satisfaction of the Planning and Zoning Commission. This analysis shall study the parking demand and proposed supply to demonstrate proposed uses will be supported by on-site parking and/or available railroad parking accessible to the public without a permit after 3:00pm. All rezoning applications shall also be in accordance with §42. On all waterfront Lots, at least one water dependent use must be provided. (819, 01/12/2023)

Table 2

shall be provided by proposed on-site private lots that provide a minimum number of parking spaces as set forth below notwithstanding any other provision in these regulations:

Multi-family dwelling units	
Studio, efficiency, or 1 bedroom unit	1.5 spaces per unit
2 or more bedroom unit	2.0 spaces per unit
All non-residential uses within the GBD/SM, with the exception of places of public assembly including indoor theaters and Event Facilities.	1 space for each 1,000 square feet of gross floor area which may be reduced at the discretion of the Planning and Zoning Commission to 1 space for each 1,300 square feet of gross floor area
Indoor theaters and Event Facilities as defined in §5-2	Minimum parking requirements shall be established at the discretion and to the satisfaction of the Planning and Zoning Commission.

The Planning and Zoning Commission may permit 50% Joint Parking, as defined in §34-8, for mixed retail, restaurant, hotel, residential, office use developments and all other permitted uses when an applicant demonstrates there will be no substantial conflict in the operating hours for which the Joint Parking facilities are proposed. The Joint Parking approved on an integrated site may be applied to any building located on the integrated site.

For properties located in the GBD/SM zone and where required parking is to be satisfied through means other than traditional "self-park" spaces and/or through a reduction in the minimum parking required for non-residential uses, an overall reduction of spaces, or automation of parking, the Planning and Zoning Commission may, by Special Permit, approve a Parking Management Plan (PMP) as defined in §5-2, detailing all such on-site parking strategies, technologies and/or demand management strategies. The PMP shall also demonstrate to the satisfaction of the Planning and Zoning Commission that planning for employee parking on and/or off-site was considered and will be reasonably addressed.

The final Parking Management Plan shall be included with the Special Permit application for review by the Planning and Zoning Commission and shall be filed on the Westport Land Records prior to the issuance of a Zoning Permit.

At least five (5) electric charging stations shall be provided for every fifty (50) parking spaces provided. Digital advertising on electric vehicle charging stations shall be permitted in below grade concealed parking structures. Digital advertising on electric vehicle charging stations shall be prohibited in areas visible from a public right of way. (819, 01/12/2023)

Table 3 – Contents from FLB law to P&Z letter dated March 25th, 2025

Eric Bernheim

To: Andy Soumelidis
Subject: RE: Parking Lot Data - Westport Station

From: Farrell, David <dfarrell@westportct.gov>
Sent: Wednesday, December 18, 2024 11:07:08 AM
To: Koskinas, Fotios <fkoskinas@westportct.gov>
Subject: Parking Lot Data - Westport Station

Chief,
The objective of this ongoing parking study is to analyze the current usage of parking lots at the Saugatuck (Westport) train station, identify capacity constraints, and propose recommendations for improved parking management if necessary. The study evaluates current parking lot occupancy and usage trends. Data was collected by Staff Corporal Sember and is now collected by Staff Corporal Sabin. Field surveys are conducted covering weekdays and weekends. Utilization rates were calculated for each lot and comparisons were made between peak and off-peak periods to determine an overall average. It should be noted that Lot #8 on Saugatuck Avenue is still unavailable due to the ongoing CT DOT project.

The findings indicate the following:

- Monday and Friday continue to be our low-capacity days at approximately 60% - 70% of all lots.
- Tuesday, Wednesday and Thursday continue to be our high-capacity days at approximately 85% - 90% of all lots.
- Off-peak hours (5:00PM and after): 25% - 40%.
- Weekend occupancy: 20%.

Average weekday usage by month:

July	45% - 50%
August	50% - 60%
September	75% - 80%
October	75% - 80%
November	75% - 80%
December	75% - 80%

We are currently at the optimal level of EV charging / parking spots and the need for more is constantly monitored. We have also partnered with Wheels2U, a local transit provider, to promote carpooling and shuttle services.

Please let me know if you need further information.

Respectfully,

Deputy Chief David Farrell
Support Commander
Westport Police Department
50 Jesup Road
Westport, CT 06880
Direct: 203.341.6097
Main: 203.341.6000
Fax: 203.341.6094

Table 4 - SLR March 2025 Traffic study

In my letter, I referenced car trips without TOD credit since it is not a TOD zoned area and there has been no demonstration that patrons will use the train

Proposed Development: Site-Generated Traffic

Driveway (Land Use)	Unit Count/Square Footage	Number of Vehicle Trips								
		Weekday Morning Peak Hour			Weekday Afternoon Peak Hour			Saturday Midd Peak Hour		
		In	Out	Total	In	Out	Total	In	Out	T
Franklin Street driveway (right-in/right-out)										
Total Franklin Street Trips (*Restaurant, Retail, Kids Club, Market, Spa, Residential*)		159	129	287	351	293	644	361	330	(
Hotel Driveway on Railroad Place										
Total Hotel Driveway Trips (*Hotel, Residential*)		16	16	32	20	18	38	26	21	
Commuter Lot driveway (Railroad Place and Franklin Street)										
Total Commuter Lot Trips (*Event Space*[1])	300 seats/500 seats[2]	0	0	0	64	32	96	94	66	
20% Internal Capture and Transit-Oriented Development (TOD) Credit		*-35*	*-29*	*-64*	*-87*	*-69*	*-156*	*-96*	*-83*	-
NET NEW DEVELOPMENT TRIPS		**140**	**116**	**255**	**348**	**274**	**622**	**385**	**334**	

Trip Generation, 11th Edition, Institute of Transportation Engineers, 2021

[1] Event space trip generation per CTDOT guidance

[2] Event space attendance weekday maximum is 300 seats after 3:00 p.m., weekend maximum is 500 seats