

March 17, 2021



Mr. Gil Piaquadio - Supervisor  
Town of Newburgh  
1496 Route 300  
Newburgh, NY 12550

**RE: Proposed Zoning Code Change for Monticello Raceway Management, Inc, Newburgh Mall, NY Route 300, Town of Newburgh, NY; CM Project #121-001.2**

Dear Supervisor and Board Members:

We have received the submission cover letter, EAF, petition, and traffic analysis prepared by Burke, Miele, Golden, and Naughton, LLP, and Maser Consulting, dated February 12, 2021, in the matter of the amending the zoning code definition for “shopping center.” Based on the information submitted, we offer the following comments relative to traffic:

1. The traffic analysis collected new traffic data for the mall in January 2021 and compared those volumes to data collected in 2019, prior to the pandemic. The analysis found that present volumes were 28% lower during the weekday afternoon peak hour and 25% lower on the Saturday mid-day peak hour. These lower volumes can be attributed to the post-holiday shopping season, tenant vacancies, and the COVID-19 pandemic.
2. The analysis included a trip generation estimate using industry standards – the Institute of Transportation Engineers (ITE) - to estimate the full mall’s potential trip generation as 1,488 trips during the weekday PM peak hour and 1,814 trips during the Saturday mid-day peak hour. Trips for the former Bon-Ton area, about 90,000 SF, was further estimated to account for 343 trips during the PM peak hour and 419 trips during the Saturday peak hour. This was then compared to the estimate of trips that would be generated by the conversion of the Bon-Ton (presently Jennifer Furniture) to video lottery terminals (VTL), which is 310 trips during the PM peak hour and 314 trips during the Saturday peak hour. This comparison suggests that the conversion of the 90,000 SF of retail space to VTL uses will result in a net decrease of approximately 33 trips in the PM peak hour (343-310 trips) and 105 trips in the Saturday mid-day peak hour (419-314 trips).
3. The mall is currently generating about 667 trips during the weekday PM peak hour and 945 trips during the Saturday peak hour according to Figures 2 and 3.<sup>1</sup> Adjusting for seasonal and pandemic conditions, mall traffic increases to 926 trips in the PM peak hour (+28%) and 1,260 trips in the Saturday peak hour (+25%). The trip generation rate for the 390,000 SF gross leasable area of the mall is 2.37 trips per 1,000 SF in the PM peak hour and 3.23 T/KSF in the Saturday peak hour. Applying these rates to the 90 KSF Bon-Ton area yields an estimate of 231 trips generated during the PM peak hour and 291 trips generating during the Saturday peak hour. This calculation suggests that the mall is generating approximately 31% to 33% less traffic than ITE sources, even after adjusting for COVID. Further, it suggests that the conversion of the 90,000 SF of retail space to VLT uses will result in a modest increase in gross traffic volumes at the mall – +34% during the weekday PM peak hour and +8% during the Saturday peak hour.

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<sup>1</sup> Note that on Figure 3, intersection #3 (Rt 300/South Mall Driveway), there is a typo – the exiting volume should be zero lefts and 217 rights, not 5 lefts and 6 rights.

4. In the conservative case (estimating a gross increase in traffic), the additional 79 trips generated during the weekday PM peak hour and 23 trips in the Saturday mid-day peak hour will be divided across three access points, entering and exiting distributions, and directional distributions, likely equating to about a 5 to 20 trip increase on any particular movement. This will easily be accommodated by the present transportation system.

5. The analysis reviewed the existing parking demand of the mall around the middle and north ends of the property, as depicted in the aerial to the right. Of the 900 spaces studied, approximately 78 to 80% of the spaces (705 to 720 spaces) were unoccupied after adjusting for COVID conditions.



6. The proposed parking demand varies from about 505 vehicles to 828 vehicles (including employees, assuming a 15% carpool/transit credit).

7. On Friday, the change in use will increase the parking demand and reduce the surplus available parking to an average of 13% during the noon to 8 p.m. hours, after which, the mall stores close and parking availability increases.

8. On Saturday, the parking surplus will be an average of about 7%, with the northern lots depicted effectively being fully occupied (less than 10% available) from 2 p.m. to 8 p.m., after which the mall closes.

9. These estimates do not take any credit for the existing parking demand of the Jennifer Furniture business, nor does it account for the underutilized parking available at the southern end of the mall.

10. In our opinion, the analysis demonstrates that the mall has adequate available parking for the proposed VLT use during a non-holiday shopping season, but there may be additional parking demand during the shopping season and if the vacant retail spaces were occupied. The additional foot-traffic to the mall could increase mall customer demand and backfill the vacancies.

11. Given the approach to the mall (arrival from Route 300), we believe the highest parking demand will be on the east side of the mall and the west side will be underutilized. It may be necessary to direct employees to park on the west side (areas A-D), or add signage to indicate "Additional Parking" on the west side.

12. The recently completed Mavis Tire/Aspen Dental/Buffalo Wild Wings development adjacent to the mall added about 220 feet of sidewalk along Route 300 and ended at the property line with the mall. As with other recent projects (BJ's, Ready Coffee, Crystal Run, CVS), we suggest the

Town consider requesting that the applicant extend the Mavis Tire sidewalk south to accommodate pedestrians walking across the mall frontage.

13. The Transit Orange bus stop near the Chilito's mall entrance is presently just a sign. Consideration should be given to providing a shelter for use by mall and VLT customers and employees.
14. Although no changes are proposed to Route 300 (unless a sidewalk is constructed), we recommend NYSDOT be consulted in the process given their jurisdiction over Route 300.

If you have any questions about the above comments, please don't hesitate to contact me at 518-689-1834 or [kwersted@cmellp.com](mailto:kwersted@cmellp.com).

Respectfully,  
Creighton Manning Engineering, LLP



Kenneth Wersted, PE, PTOE  
Associate

C: Mark Taylor – Town Board Attorney  
Pat Hines – MHE  
John Ewasutyn – Planning Board