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RE: 247-251 HAZEL STREET, CITY OF WATERLOO – TRANSPORTATION IMPACT STUDY ADDENDUM

In July 2025, Paradigm Transportation Solutions Limited (Paradigm) prepared a Transportation Impact Study and Transportation Demand Management (TDM) Plan for the proposed redevelopment of 247-251 Hazel Street in Waterloo. The analysis was based on 94 one-bedroom units and 180 m^2 (1,937 sq. ft.) of ground floor commercial uses. Since preparing that study, the property owner has revised the development concept to comprise 64 one-bedroom units and 30 two-bedroom units, with 174 m^2 (1,873 sq. ft.) of ground floor commercial uses.

The purpose of this letter is to assess whether the revised unit composition and reduced commercial floor area affect the findings, conclusions, or recommendations of the July 2025 TIS.

Net Change in Trip Generation

The trip generation estimates in the July 2025 TIS were based on data published in the Institute of Transportation Engineers (ITE) *Trip Generation Manual* for land use code (LUC) 222 (Multifamily Housing, High-Rise) and LUC 822 (Strip Retail Plaza). The site was estimated to generate 29 trips in the weekday AM peak hour and 39 trips in the weekday PM peak hour.

LUC 222 is described as “a residential building with more than 10 floors [with] access to individual dwelling units through an outside building entrance, a lobby, elevators, and a set of hallways.”[1] The 94 residential units were estimated to generate 25 trips in the weekday AM peak hour (0.27 trips per unit) and 30 trips in the weekday PM peak hour (0.32 trips per unit).[2]

For LUC 222, ITE publishes trip generation rates only as a function of the number of dwelling units. It does not publish rates based on other potential independent variables, such as the

[1] Institute of Transportation Engineers, *Trip Generation Manual, 12 ed., Vol. 3*, (ITE: Washington DC, 2025), 314.
[2] Paradigm Transportation Solutions Limited, *247-251 Hazel Street, Waterloo, Transportation Impact Study and TDM Plan*, (PTSL: Cambridge, 2025), 18.

number of bedrooms or gross floor area. Accordingly, the published rates reflect the range of unit compositions among the sites included in the LUC 222 data set.

Because the total number of units remains unchanged, the residential trip generation estimates remain unchanged from those presented in the July 2025 TIS. Similarly, the July 2025 TIS presents a conservative (higher) estimate of commercial-related trips because the floor area for the commercial uses has been reduced. Therefore, the findings, conclusions, and recommendations of the July 2025 TIS remain unchanged.

Closing

We trust that this letter adequately addresses the effect of the revised unit composition and change in floor area for the commercial uses on the findings, conclusions, and recommendations of the July 2025 TIS. Please contact the undersigned if you have any questions.

Yours very truly,

PARADIGM TRANSPORTATION SOLUTIONS LIMITED



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