



April 30, 2021

Ms. Kathy Joubert, Town Planner
Town of Northborough
Northborough Town Offices
63 Main Street
Northborough, MA 01532

**RE: Transportation Impact Assessment Peer Review
425 Whitney Street, Northborough, Massachusetts**

Dear Ms. Joubert,

Environmental Partners (EP) has reviewed VAI's responses to the comments raised in the Traffic Impact Assessment Peer Review (dated February 25, 2021) regarding the proposed laboratory/manufacturing facility to be located at 425 Whitney Street in Northborough, Massachusetts. Please see our responses below.

EXISTING CONDITIONS

1. **EP Comment 2/25/21:** The TIA indicates the project is expected to generate fewer vehicles than the existing/former usage. As such, VAI only included one study roadway and no study intersections as part of the study area, and therefore did not perform traffic analysis as part of this assessment. It is unclear based on the information provided whether or not the previous occupant still occupied the site as an existing usage at the time the traffic counts were completed in November 2019 and whether or not the occupancy was recent enough to be considered an existing condition. EP requests clarification on the status of the previous occupant.

VAI Comment 3/3/21: The previous occupant of the subject building and property (Metrie Interior Moldings and Doors) was active within the past 3 years and, consistent with the standards of the Massachusetts Environmental Policy Act (MEPA) and the Massachusetts Department of Transportation (MassDOT), uses that were active within the past 3-years can be considered when evaluating the "as-of-right" reuse of a property to establish the comparative impact of new development or redevelopment. Metrie relocated its operations to 301 Bartlett Street in Northborough in May 2019.

EP Comment 4/30/21: VAI has clarified the status of the previous occupant and we have no further questions. **Comment Closed**

PROJECT-GENERATED TRAFFIC

2. **EP Comment 2/25/21:** VAI used 49,000 sf of occupied space to calculate the trip generation and did not account for the 20,228 sf of storage/warehouse space. EP requests clarification on what justification and standard was used as the basis for using the partial square-footage.

VAI Comment 3/3/21: The functional disposition of the 69,228± square foot (sf) building will include 49,000± sf of office, laboratory and manufacturing space, and 20,228± sf of associated storage and warehouse space. There will be no employees assigned to the storage/warehouse space and, as such, this space will not produce traffic. That being said, including the storage and warehouse space would increase the peak-hour traffic volume projections for the Project by six (6) vehicle trips during the weekday morning peak-hour and by eight (8) vehicle trips during both the weekday evening and Saturday midday peak hours. The resulting peak-hour trip calculations for the Project would be 34 vehicle trips during the weekday morning peak-hour, 29 vehicle trips during the weekday evening peak-hour and 28 vehicle trips during the Saturday midday peak-hour.

Alternatively, it is anticipated at approximately 20 employees will be assigned to the proposed facility. Using the number of employees as the independent variable would result in nine (9) vehicle trips during the weekday morning peak-hour, seven (7) vehicle trips during the weekday evening peak-hour and two (2) vehicle trips during the Saturday midday peak-hour.

Using either methodology, the predicted traffic volumes that are associated with the Project are relatively minor and, when dispersed over the respective peak hours, would not result in a significant increase in motorist delays or vehicle queuing over existing conditions.

EP Comment 4/30/21: Given the relatively low difference in vehicle trips as compared to the previous use, and particularly that the trip generation based on either the partial or full square-footage (49,000± or 69,228±) appears to be conservative based on the estimated number of employees, EP requests no further information. **Comment closed**

3. **EP Comment 2/25/21:** • VAI used ITE's fitted curve methodology in establishing proposed trips; however, given the available sample points, one could argue using average rate methodology. With the evaluated 49,000 sf of occupied space, the morning peak hour would increase from the projected 26 trips to 34 trips and the evening peak hour would increase from 23 trips to 31 trips, which is either at or slightly above the existing trips. If the higher square footage is used, the difference in trips would almost double. EP requests clarification on the selected trip-generation methodology.

VAI Comment 3/3/21: The Institute of Transportation Engineers (ITE) recommends that the fitted curve equation be used to establish the trip characteristics for a land use when an equation is provided and there are more than 20 data points available for the land use under study. A review of the ITE trip-generation data for Land Use Code (LUC) 110, General Light Industrial, indicates that the LUC meets the recommended practice for use of the fitted curve equation.

EP Comment 4/30/21: As previously stated, one could argue use of either methodology based on the recommended procedures outlined in ITE; however, EP is satisfied with VAI's justification and we have no further questions. **Comment closed**

4. **EP Comment 2/25/21:** •As discussed under the Existing Conditions section above, VAI did not include study intersections or traffic analysis given their anticipated reduction in vehicle trips for the proposed facility compared to the former use. Based solely on the TIA's findings, it appears that the proposed site generated volumes equate to one vehicle every two or three minutes which will likely result in negligible or minor delays and would be anticipated to be less than the former use. However, EP requests clarification regarding the above-discussed trip generation methodology, proposed development size, and the status of the former use before commenting on the accuracy of trip generation and the potential need for further evaluation.

VAI Comment 3/3/21: Responses have been provided to EP's comments and affirm that the Project will result in comparable traffic volumes to the former use that occupied the Project site

EP Comment 4/30/21: EP is satisfied with VAI's responses to all comments regarding the trip generation and we have no further questions. **Comment closed**

SIGHT DISTANCE

5. **EP Comment 2/25/21:** • During our site visit, EP measured the sight distance from the location of the proposed site driveway along Whitney Street. We agree that with selective vegetation clearing, the required minimum sight distance should be met. We request that the Applicant provide sight triangles for the proposed driveway on the site plans to indicate areas where all objects and vegetation should be removed and/or maintained below a height of 2.5 feet.

VAI Comment 3/3/21: The sight triangle areas will be added to the Site Plans along with a note stating "Signs, landscaping and other features located within sight triangle areas shall be designed, installed and maintained so as not to exceed 2.5-feet in height. Snow windrows located within sight triangle areas that exceed 3.5-feet in height or that would otherwise inhibit sight lines shall be promptly removed."

EP Comment 4/30/21: The sight triangles have been provided and EP has no further comments. **Comment closed**

VAI has adequately addressed all of our questions raised in the TIA Peer Review, and all comments have been closed as of this review. We appreciate the opportunity to assist you on this project.

Very Truly Yours,

Environmental Partners Group, Inc.



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