



GREEN INTERNATIONAL AFFILIATES, INC.

239 LITTLETON ROAD, SUITE 3 WESTFORD, MA 01886

T: (978) 923-0400 | F: (978) 399-0033 | WWW.GREENINTL.COM

December 19, 2019

Mr. Michael Antonellis
Town Planner
Lancaster Town Offices
701 Main Street
Lancaster, MA 01523

Subject: **Engineering Peer Review Services**
IPOD Master Plan Review
Transportation
Capital Commerce Center

Dear Mr. Antonellis:

In response to your request, Green International Affiliates, Inc. (Green) has completed our initial traffic peer review of the IPOD Master Plan known as the proposed "Capital Commerce Center" located off of McGovern Boulevard and Lunenburg Road, within the Integrated Planning Overlay District (IPOD). This letter report summarizes the results and findings from our engineering peer review of the application package for the proposed project. The scope of our review included a review of the transportation analysis as they solely relate to the IPOD zoning requirements and criteria. This review does not include any review of the traffic analysis completed by the Applicant prior to or part of the Draft Environmental Impact Report (DEIR) that was filed with the State after the IPOD Master Plan application had been filed with the town.

This review included an examination of the following documents submitted in support of the proposed project:

- Report titled "IPOD Special Permit Application, Capital Commerce Center", prepared by Bohler Engineering, dated October 3, 2019.
- Report titled "Project Narrative for Proposed Capital Commerce Center Integrated Plan", prepared by Capital Group Properties, dated October 3, 2019.
- Report titled "IPOD District Traffic Analysis Letter", prepared by The Engineering Corp, dated October 2, 2019.
- Document titled "Town of Lancaster Zoning Bylaws", prepared by the Town of Lancaster.
- Document titled "Town of Lancaster Master Plan", prepared by the Town of Lancaster.
- Plan titled "IPOD Master Plan", prepared by Bohler Engineering, dated September 24, 2019.

The focus of the traffic analysis and subsequent review at the IPOD master plan stage is very limited based on the regulations. Included is the review of trip generation and the anticipated conditions of access to and from the site. In addition to the review of the above documents, Green visited the project site and the surrounding roadways on December 06, 2019 to gain a better understanding of the existing conditions and the context of the proposed project. Green offers the following comments resulting from our review of the above documents:

1. The proposed project as outlined in the Special Permit Application and Project Narrative defines the proposed site as containing 1,647,800 square feet (SF) of Industrial space, 500 multi-family residential units, a hotel containing 120 rooms, retail space of 16,300 SF, and 86,400 SF of an indoor sports facility. All of the traffic assumptions were based on this use breakdown. While we did not review the DEIR, other submittals by the proponent, such as the DEIR, contain different usage breakdowns, including a decrease in the size of the industrial park and an increase in the size of the

retail space. The proponent should clarify the intended uses for the site, and the trip generation should be revised to accurately reflect the proposed plan.

2. The proposed use regulations for the IPOD state that “The Planning Board must find that there is no material impact to the neighborhood”. The IPOD District Traffic Analysis Letter prepared by TEC for the Capital Commerce Center does not attempt to measure the impact of traffic on the neighborhood. The only analysis provided within the Traffic Analysis letter consisted of an internal Site Driveway, and did not evaluate any impacts on surrounding roadways or intersections outside of the site, including the intersections where the Site Driveways intersect with Lunenburg Road. It is our opinion that without this “external” analysis a determination on material impacts to the neighborhood cannot be made with respect to traffic.
3. The IPOD District Traffic Analysis Letter states that the traffic generated by the proposed site plan will not exceed 20 trips per acre, as required under the Zoning code 220-8-7 which defines IPOD use regulations. The letter states that “Over the 401.8-Acre site, the project is anticipated to generate 19.92 trips per acre in compliance with Section 220-8.7(E)(3)(g) of the Town of Lancaster Zoning By-law.” However, the Traffic Analysis Letter also calculates the trips generated by the site as 8,142 trips. This results in 20.26 trips per acre which exceeds the amount allowed within the zoning bylaw. In addition, any change in use will have an impact on this ratio. Clarification is required and this ratio should be revised to accurately reflect the correct trip generation and any changes in the proposed site plan.
4. The trip generation described in the letter does not accurately reflect the trip generation calculations in the appendix. The letter should be revised to include the correct trip generation total and also include a discussion of any pass-by credits that were used to develop the trips per acre calculation. One of the requirements as defined in the MassDOT Traffic Analysis guidelines, for pass-by credits is that the total pass-by volume may not exceed 15% of adjacent street traffic. The proponent did not quantify the amount of adjacent street (Lunenburg Street) traffic, therefore this credit cannot be verified with the information provided.
5. The trip generation calculations utilize an internal capture credit that reduces the number of trips due to the mixed-use nature of the site. Mixed uses that include residential, retail and commercial uses will realistically result in this phenomena occurring. However, this credit relies heavily on the residential uses within the site. Any change in the amount of residential use will have a significant impact on this trip credit and could result in an increase in overall trips. The proponent has stated within the Project Narrative that they are amenable to removing all residential components of the site plan. The proponent should clarify their intentions with regard to the residential use and update any trip generation calculations accordingly. In the event that the residential use is removed, the site will no longer be in compliance with the Zoning bylaw 220-8.7 (B)(6) which states that residential uses shall comprise not less than 25% and not more than 75% of the gross floor area planned within any integrated plan.
6. The traffic analysis provided by the proponent to determine that the Level of Service will not exceed “C” as required under the IPOD Zoning by-laws Section 220-8.7(E)(3)(g) was completed at the internal driveway that provides access to building N. Again, this is not the point of primary access from the major town way (Lunenburg Road). Furthermore, the traffic analysis was completed for the AM and PM weekday peak hours, however, the trip generation shows that the peak hour with the highest volume of traffic occurs during the Saturday Midday peak hour. The proponent should provide traffic analysis for this scenario.

7. The traffic analysis for the PM peak hour does not appear to show the correct number of trips traveling past the site driveway. Based on a removal of 40% of all residential trips for building N as described in the report, there should still be approximately 271 incoming trips and 466 outgoing trips that are traveling past the driveway for building N. The traffic analysis only shows 236 incoming trips and 428 outgoing trips. This discrepancy should be explained within the report or revised to reflect the accurate traffic volumes. The proponent should be advised that pass-by credits cannot be taken for any internal intersections.
8. While more minor, the traffic analysis for the AM peak hour does not appear to show the correct number of trips traveling past the site driveway or out of the site driveway. The outgoing trips should be revised from 32 to 33 trips, and the trips that are traveling past the driveway should be revised to accurately reflect the remaining trips occurring during the AM peak hour that are not utilizing the other driveways for building N.
9. The Project Narrative for the proposed Capital Commerce Center outlines a number of mitigation commitments with regard to traffic. At this time, the Traffic Analysis Letter prepared by The Engineering Corp has not evaluated the impacts of this mitigation. As a result, we cannot comment on the efficacy of these improvements at this time.
10. The mitigation included in the Project Narrative includes a five-foot sidewalk along each side of the internal McGovern Boulevard and bicycle accommodations in the form of shared-use lane markings and signage again on the internal roadway. The proponent also states that additional pedestrian crossings will be provided across McGovern Boulevard within the site. The site plan should be updated to show the proposed locations of the sidewalks and the proposed crossings. At a minimum, the mitigation description should state where the proposed crossings will be located. Other actions both for internal locations as well as external will need to be defined going forward.
11. The site plan provided identifies 2,397 surface parking spaces for the entire site, along with 316 trailer parking spaces for the industrial use and 355 loading docks. The parking criteria outlined in Zoning Bylaws 220-23 states that the minimum number of spaces for a Manufacturing, processing, assembly, packaging, storage use shall be "not fewer than one space per 300 square feet gross floor area". This is the use that is most similar to the industrial use provided within the site plan. However, this would result in a parking requirement of 5,493 spaces for just this use. The proponent should clarify how they will meet the parking requirement outlined in Zoning Bylaw 220-23, and why a reduction in parking may be appropriate for their proposed uses.

If either the Town staff or the Applicant's engineer would like to discuss any of these comments further, please feel free to contact me at 978-923-0400.

Sincerely,
Green International Affiliates, Inc.



Corinne S. Tobias, P.E., PTOE
Project Manager

cc: W. Wong, Green
W. Scully, Green

\\fs1\Engineering\Projects\2019\19103\DOCS\RPTS\2019-12-18 Traffic Peer Review.docx