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January 27, 2020

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

Subject: **Engineering Peer Review Services
Phase 1 IPOD Master Plan Review
Transportation - Revised
Capital Commerce Center**

Dear Mr. Aronstein:

On behalf of the Town of Lancaster, Green International Affiliates, Inc. (Green) is submitting a report of the findings from our revised engineering peer review of the application package for the proposed "Capital Commerce Center" located off of McGovern Boulevard and Lunenburg Road, within the Integrated Planning Overlay District (IPOD). The scope of our review included a review of the transportation access and impacts as they relate to the IPOD zoning requirements.

This review included an examination of the following documents submitted in addition to those referenced in the initial review dated December 18, 2019:

- Letter titled "IPOD District Traffic Analysis – Response to Peer Review Comments", prepared by The Engineering Corp, dated December 20, 2019.
- Report titled "Draft Environmental Impact Report: Capital Commerce Center", prepared by Bohler Engineering, dated November 15, 2019.

The initial letter contained the following comments that were still unresolved after the public hearing that took place on Monday, December 23, 2019.

1. Initial Comment: 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. However, 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.

Response: The IPOD District Traffic Analysis Letter submitted to the Lancaster Planning Board on October 2, 2019 outlines the traffic components related to only those parts of the development defined in the IPOD District. Therefore, the other associated retail uses along Lunenburg Road; including Dunkin Donuts and Mobil Gas, were not summarized. TEC and the Applicant recognize that the square footage shown in the IPOD submission is approximately 80,000 SF higher than as reported in the DEIR for the industrial park area. Therefore, the trip generation calculations as provided are more conservative than the DEIR. The square footages reported in the IPOD submission

documents will be updated in the project's FEIR and subsequent site plan review level traffic impact assessments. Overall, the small discrepancy in the industrial square footage has no substantial effect on the overall project impact.

Comment: The trip generation provided in the DEIR shows 11,332 gross daily site generated trips on approximately 471 acres of land, not including the existing uses. This results in a ratio of 24.1 trips/acre. The net site generated trips, accounting for pass-by and internal capture credits, is 9790, or 20.8 trips/acre. The proponent has stated that this is not the final plan and the project has since been revised. The trip generation provided in the IPOD application is below the 20 trips/acre threshold cited in Zoning Code 220-8-7. Any further changes to the site plan should remain under the zoning threshold of 20 trips/acre.

2. **Initial Comment:** 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 analysis a determination on material impacts to the neighborhood can not be made with respect to traffic.

Response: *A detailed analysis of the intersection of McGovern Boulevard / Lunenburg Road is provided as part of the project's DEIR. Further analysis of this intersection, and other study area intersections, will be evaluated during the project's site plan review processes with the Lancaster Planning Board. The Applicant has committed to complete a full traffic impact assessment for each major phase of site plan review, which will not be segmented and will address the entirety of impacts through that point of site plan review. The Applicant's subsequent detailed traffic studies will review the appropriateness and timing of the conceptual traffic mitigation identified within the DEIR.*

Comment: The Main Street at Seven Bridge Road northbound approach will operate at Level of Service (LOS) "F" under build with mitigation conditions during the PM peak hour. The proponent states that this operation is improved from existing conditions, however that is due to signalization that is occurring due to an outside MassDOT project with an unspecified timeline. The westbound approach, while operating at a LOS "D" during the PM peak hour, is approaching full capacity with a volume/capacity ratio of 0.99 and queues of over 1000 feet. The proponent should revise the analysis for a reduced project size that is within the trip generation thresholds outlined in the zoning code. In the event that these impacts remain, the proponent should consider additional mitigation measures or making a contribution towards the implementation of short-term improvements at this intersection.

The Lunenburg Road at Old Union Turnpike intersection westbound approach goes from a LOS "C" under No-Build conditions to a LOS "E" during the PM peak hour, and the queues on the northbound approach will exceed 800 feet. This intersection was reconfigured to a roundabout in 2013. No mitigation is proposed for this location. Given the conservative nature of the DEIR trip generation as it relates to the allowed project size (over 20 trips/acre), the proponent should consider submitting a revised analysis for a reduced project size as it may eliminate the impacts at this location. In the event that the impact remains, the proponent should consider whether additional mitigation measures such as a northbound right slip-lane may be appropriate at this location.

6. Initial Comment: 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) occurred at the driveway that provides access to building N. 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.

Response: *An individual traffic impact analysis for the IPOD District uses was not conducted separately by the Applicant; however, a capacity and queue analysis has been completed by the Applicant as part of the project's DEIR for the intersection of McGovern Boulevard / Lunenburg Road under 2026 Build with Mitigation conditions. These conditions are shown following the introduction of auxiliary turn lanes and a traffic signal at the intersection under full build conditions. Note that the analysis provided in the DEIR included the full DEIR trip generation; including the expanded retail area adjacent to Lunenburg Road. Table 1 (see DEIR) provides a summary of the intersection's capacity and queue analysis for the intersection of McGovern Boulevard / Lunenburg Road provided in the DEIR. Note that all movements at the intersection of McGovern Boulevard / Lunenburg Road are anticipated to operate at acceptable levels-of-service (LOS C or better) during each analysis scenario.*

Other DEIR study area intersections along Lunenburg Road to the north and south of the project site have traditionally acceptable levels of service and involve MassDOT-funded improvements.

Comment: **The intersection of Lunenburg Road and McGovern Blvd operates at acceptable LOS "C" or better under build with mitigation conditions during all time periods. This mitigation includes roadway widening and the introduction of a traffic signal. The widening will be implemented prior to the issuance of an occupancy permit, and the signal will be implemented once traffic volumes warrant it. The proponent should specify that the commitment to monitor traffic under the Transportation Demand Management Plan will include traffic monitoring at that intersection in order to determine when the threshold for signalization is met.**

9. Initial Comment: 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.

Response: *As highlighted by GIA in its peer review letter, the focus of the traffic analysis and subsequent review at the IPOD master plan stage is very limited based on the regulations. It is the intent of the Applicant to generate specific traffic impact assessments at each major building stage of the development during the site plan review. Each traffic impact assessment will not be segmented during each individual Site Plan approval so to show the entire impact of the project at that time. Transportation mitigation will be specifically proposed at each individual building stage of the development during the site plan review and will be based on the conceptually proposed mitigation measures identified within the DEIR.*

Separate from the IPOD master plan review, the Applicant proposes a comprehensive transportation mitigation program in the vicinity of the site to improve vehicular, bicycle, and pedestrian operations and safety. The primary improvements include the reconstruction of the Lunenburg Road / McGovern Boulevard intersection. In addition, the Proponent seeks to significantly improve multi-modal accommodations for bicycles and pedestrians along McGovern Boulevard to service not only the Capital Commerce Center Project; but other existing and future developments in the vicinity of

the Lunenburg Road intersection with McGovern Boulevard. The Project's DEIR provides a detailed description of the Project's off-site mitigation. A summary of the overall mitigation package is provided in Table 2 (see DEIR).

The scope of the mitigation is still being evaluated by the Applicant, MassDOT, and the Town and will be further refined with each traffic impact assessment for each phase of site plan review.

Comment: The mitigation provided in the DEIR outlines lane widening and signalization at Lunenburg Road and McGovern Boulevard, the primary entrance to the project site. The proponent has also committed to signal timing upgrades at the intersections of Main Street at Lunenburg Road and Main Street at Seven Bridge Road. In addition to these upgrades, the proponent is relying on a number of MassDOT upgrades that are being implemented outside of the scope of this project. The proponent should clarify the expected timeframe of these projects in relation to the proposed build-out and consider whether any short-term solutions can be advanced independently.

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

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