

TECHNICAL MEMORANDUM

From: Michael R. Abend

Date: September 22, 2005

Job #: 20144

SUBJECT: RESPONSE TO PLANNING BOARD COMMENTS
HOPPING BROOK BUSINESS PARK
HOLLISTON, MASSACHUSETTS

A letter was submitted to Karen Sherman, Holliston Town Planner, from Erik Maki, Planning Board, dated July 12, 2005; it included 13 points. This memorandum addresses each point individually, in order. Each comment is summarized and then a response is provided.

1. The study does not follow the standard methodologies for estimating vehicle trips.

Response: The EOEa/EOTC guidelines allow for using alternative approaches to projecting vehicle trips when strict application of the ITE information may not be appropriate. The DEIR includes detailed documentation of the methods used and explains clearly why the ITE trip data was not directly applied. A projection of additional trips was included when the Notice of Project Change for the project was initially submitted to MEPA in 2002. Based on feedback from MEPA and MassHighway (i.e., EOEa and EOTC), this method was adjusted and MassHighway's Engineer at the District 3 office in Worcester approved an alternative method of projecting trips before the EIR study was prepared. Note that MEPA, at the time, deferred to MHD regarding approval of the trip generation methodology.

The project is not a standard project for a variety of reasons, explained in the traffic study; MEPA and MHD concurred. Further, MEPA and MHD approved the study, as prepared, based on the trip generation methodology used. We stand behind our projections and continue to believe that they are more accurate than if the projections were done using strict ITE rates and equations. It is worth pointing out that the trips in and out of the existing industrial park, documented on more than one occasion, are not at all comparable to the ITE rates/equations, confirmation that the ITE rates are not directly applicable to this park.

2. The study does not include the Washington Street intersections at Highland Street, at Hollis Street, and Winter Street; MHD has no plans to upgrade these intersections, therefore, they need to be considered by the Applicant.

Response: The study area for the analysis was established through normal procedures, outlined and then specifically approved by MEPA. The fact that an intersection is not being upgraded by the state does not mean it needs to be addressed by a subsequent applicant. The study covered all intersections required by MEPA as determined by the public process, including local input.

3. The existing flashing signal described as being at Central Street is at Exchange Street.

Response: This is correct. However, the specific location of the flasher does not affect the study's analysis or conclusion; the flasher simply reinforces the stop sign control at an intersection.

4. Route 16 past Hopping Brook Road has a two-way passing zone; Hopping Brook Road is not currently striped for two exit lanes.

Response: There is a passing zone past the site but this does not affect the analysis or the conclusions of the analysis except that MassHighway might want to consider eliminating this passing zone to provide a safer condition as traffic at this park increases in the future. The exit lane from the site is only one lane but is wide enough for, and has been observed to operate as, two lanes.

5. Confirm that the December data was factored up by three percent, not down three percent to account for seasonal variation.

Response: A review of the seasonal adjustment data from MassHighway indicates that the adjustment factor for December was 0.97 and, thus, the traffic counted was actually 3 percent HIGHER than the annual average, not LOWER. Thus, the adjustment made in the report, an INCREASE of 3 percent, raised the volumes to about 6 percent above the annual average flow. This would amount to an added two years of general growth based on the 2.9 percent per year growth rate factored into the analysis in 2003 (based on the then most-recent MassHighway data available). In fact, the most recent growth rate

from MassHighway for District 3 is 0 percent, no growth. Thus, the analysis, based on the higher than appropriate existing volumes (due to the mistaken seasonal factor) and the higher than appropriate growth rate (2.9 percent per year instead of a flat rate), has volumes evaluated in the future No Build and Build conditions that are significantly overstated.

6. Depending on when the definitive subdivision plan is submitted, the December 2002 traffic data may have to be updated.

Response: See response #5 above. The analysis overstates volumes significantly for future conditions. A more recent count could very well show even lower volumes than collected in December 2002. Nonetheless, the study was done and filed in a timely manner after the count data was collected; the reason the data might be outdated is the lengthiness of the permit process. The EOEA/EOTC guidelines call for data to be less than two years old when used in an analysis, but the guidelines make no provision for recollecting information when the permit process is lengthy

7. Depending on when the definitive subdivision plan is submitted, the December 2002 accident data may have to be updated.

Response: See response to comment #6. Further, a recent review of local study area intersections indicates that no significant changes have occurred that might change the safety characteristics at these locations. Therefore, the data, available at the time of the study, is still considered relevant in providing a sense of the accident history of these intersections.

8. This study did not include the recently built Lowe's Home Improvement store.

Response: MassHighway did not mention the Lowe's Home Improvement store as being in the development pipeline at the time the background development projects were being researched in 2003. It is not clear why it was not mentioned. Regardless, considering Lowe's is two miles from the site, that it is located adjacent to an interchange of Route 495, and will attract a large percentage of its trips from this regional highway or from other directions, it is my opinion that the amount of traffic attracted to that store at peak commuter times through the several intersections in the Holliston part of the study area will be low, or at least lower than the overstated growth rate that was factored into the analysis.

9. The trip generation methodology was based on only one day of counts and does not include information on the current occupancy rates at the site. Depending on the economic climate, the occupancy may currently be at a low point. This should not be the basis for assessing the impacts for the remaining square footage of development.

Response: The reliance on a single day of counts is consistent with generally accepted practice. Regardless, Hopping Brook Road was counted on three occasions, once with an automatic traffic recorder (ATR) for 48 hours and twice between 7:00 AM and 9:00 AM and between 4:00 and 6:00 PM to document peak hour turning movements. It was noted in the *Trip Generation* section of the report that MassHighway approved the trip generation methodology based on rates developed from counts done in 2001, but that higher rates (based on the December 2002 counts) were used in the EIR. The occupied square footage of the existing buildings in the park was used for the analysis. Again, MassHighway approved the process of projecting trips before the report was prepared and the study was accepted by the state. A copy of the EIR study was filed with the Holliston Planning Board at the time, for comments.

10. The trip generation summary indicates that the additional trips associated with the full build out will be significantly less than typical ITE rates. This method is unacceptable. MEPA Guidelines should be followed or more data should be submitted to substantiate the lower trip rates.

Response: The EOEA/EOTC guidelines include a provision to consider adjustments to ITE data or to use alternate data sources if the ITE data alone and unadjusted is not expected to provide reasonable projections for a development. The reasons for not using unadjusted ITE rates were explicitly detailed in the study (including in the 2002 memorandum in the appendix to the report) and approved by MEPA and MassHighway District 3 Engineers prior to the use of other data. The alternative/adjusted trip rates were presented prior to their use and also approved by both agencies. With this in mind, the projections have been done following the appropriate EOEA/EOTC guidelines.

11. Exhibit 4 of the trip generation memorandum included in the appendix indicates that vehicle trips during the peak hour and daily periods will be significantly less than the original 1982 projections. The additional trips would equal 15,110 verses 8,480 used in the updated study. This significant reduction is not an acceptable methodology.

Response: There is a significant difference in projected trips between the methodology used (and approved) in the EIR and if the trips were based on strictly applying the ITE rates. However, the significant difference, in my opinion – and in the opinion of MassHighway engineers who reviewed and approved the methodology – is more an indication of the inappropriateness of the ITE data for this location than an indication that the approved method was inappropriate. To reiterate, both MEPA and MassHighway, the agencies who developed the EOEA/EOTC guidelines cited in the comments, approved the trip generation methodology both before it was used and after it was submitted.

12. No review of the build analysis was done due to the previously mentioned trip generation deficiencies.

Response: No response required.

13. The study does not consider the impacts along Washington Street at Highland Street, Hollis Street, and Winters Street where the level of service is currently at E/F during existing peak periods.

Response: See response to comment #2 above. These locations were not considered critical locations by state or local officials when the study area was established.