

Wrentham Planning Board  
Wrentham Town Hall  
79 South Street  
Wrentham, MA 02093

Re: Special Permit Application for 10 Commerce Blvd.

Dear Members of the Board:

The application for Site Plan/Special Permit Approval for 10 Commerce Boulevard ("10 Commerce") before the Wrentham Planning Board is for a proposed gas station and convenience store. This site plan is part of the proposed Wrentham Business Center project which includes the 15 Commerce Boulevard Warehouse/office project ("15 Commerce") on Lot 3 and Supercharged racing on Lot 2.

I am writing to express concerns over the proposed changes to the traffic signal and provide suggestions about how to resolve this.

A. Changes from 15 Commerce Application

There was extensive discussion about the proposed Hawes/Commerce/Washington traffic signal (the "Traffic Signal") during the hearing for 15 Commerce. During those proceedings, National Development, the applicant for 15 Commerce, offered mitigation to abutting properties in order to mitigate traffic and safety concerns in the area.

The Supplemental Final Environmental Impact Report ("SFEIR") submitted to MEPA on September 15, 2023 proposes removing multiple of these proposed mitigations that were included in the Planning Board process and the Final Environmental Impact Report ("FEIR") from September, 2022. The two most notable mitigations removed are the access proposed for Turnpike Truck Parts ("Turnpike") and the removal of mitigation proposed for Interstate Travel Plaza. The original FEIR and updated SFEIR signal concept proposed by 10 Commerce is included in Appendix A and B respectively.

These changes were not detailed in the 10 Commerce application. The only reference to these changes is that the application shows different approaches in diagrams/analysis and Interstate/Turnpike trips are not included in the trip generation model. The narrative does not appear to mention this change.

In the SFEIR, this excerpt from page 35 highlights the removal of both of these mitigations::

With the new proposed build program for Lot 1, access that was previously proposed to the property south of the project site is no longer included in the proposal and the approaches to the new signal are expected to only include Washington Street (Route 1), Commerce Boulevard, and Hawes Street.

The mitigation that was provided to neighboring properties is detailed in the FEIR on page 37:

Through coordination with those neighboring properties, adjustments to existing access and the proposed signal at Washington Street (Route 1) and Hawes Street/Commerce Boulevard have been incorporated into the updated conceptual signal design proposed as mitigation for this project.

Adjustments are proposed to the traffic signal in order to better accommodate exiting traffic from the Interstate Travel Plaza...

This future connection would allow traffic to and from Turnpike Truck Parts to utilize the proposed signal.

These changes were an important part of the 15 Commerce project, and it is critical to the safety of the surrounding roadways to ensure that these elements are included in 10 Commerce.

**B. MassDOT coordination and signal approval**

On page 14 of the Traffic Impact Study, 10 Commerce states:

As mentioned previously, MassDOT is undertaking a review of the Washington Street corridor north and south of Commerce Boulevard, which is in the early stages of concept design and development. Therefore, the intersection configuration of a traffic signal at Commerce Boulevard/Hawes Street has not yet been identified and would need to be approved by MassDOT. As such, the phasing and configuration of the proposed signal presented in the analysis of this traffic impact study is a concept and is expected to undergo further review, adjustment, and design as the MassDOT and MEPA processes progress. It is expected that access along the corridor for individual land uses and side streets will be reviewed and addressed in full detail as part of the MassDOT project.

This poses a number of issues.

First, the Route 1 Corridor project is a separate project that may or not move forward independently to this project. If that project is canceled or delayed, it is possible that this signal may be installed without that project. 10 Commerce blvd should be planning for this project to move forward independently and ensure that they are coordinating efforts with the corridor project.

Second, 10 Commerce acknowledges that the phasing and configuration of the proposed signal is a concept and expected to be changed further. However, 10 Commerce has had multiple meetings with MassDOT, as are outlined in the SFEIR. 10 Commerce should validate that MassDOT approves of the expected configuration prior to the special permit approval to ensure that the phase for Interstate Travel Plaza would be included and no other driveways would require access restrictions.

Third, MassDOT and MEPA have both specifically said that access should be resolved during the local permitting process. MassDOT further comments in their MEPA FEIR comment letter that there are numerous access issues to address. MassDOT has further shared that they do not have a public input process, and only the Wrentham Business Center has been invited to meetings about the Traffic Signal with MassDOT.

In the SFEIR application, the 15 Commerce project details coordination with MassDOT on the projects and reviewing designs and methodology.

10 Commerce should come to the Planning Board with a design that has initial approval from MassDOT. The town's peer reviewer should be able to review this design with commentary from abutting properties and access issues. The Planning Board should be able to condition the site plan for 10 Commerce with reasonable conditions with knowledge that MassDOT approves of those designs.

MassDOT has encouraged this in their MEPA FEIR response. MassDOT states:

The Proponent should provide an update of the local permitting processes for the proposed Project, particularly with respect to Phase 3 and any transportation issues being discussed. We strongly encourage the Proponent to consult with MassDOT before any transportation issues are discussed in local meetings or hearings.

The Proponent should continue consultation with appropriate MassDOT units, including PPDU, Traffic Operations and the District 5 Office, to address the above comments. If you have any questions regarding these comments, please contact me at *Lionel.Lucien@state.ma.us*

#### C. MassDOT approval

As discussed, the 15 Commerce application included a separate phase for Interstate Travel Plaza to ensure safe and efficient traffic operations in the surrounding vicinity. The 15 Commerce decision discusses those improvements.

12. That, during the public hearing, the Applicant noted that the Project is undergoing review by the MEPA Unit of the EOEEA as well as MassDOT and, to that end, several meetings have been held with each to review the proposed traffic improvements; and that, based upon the discussions noted in Finding #11, the Applicant is proposing the intersection improvements, subject to approval by MassDOT, to include restriping the northbound and southbound Washington St approaches to accommodate a U-turn, "Road Closed to Thru Traffic" and "No Trucks" signs would be placed at the Hawes St entrance from Washington St. & Thurston St. (Exhibit #60), along with pushing back the southbound stop line an additional traffic light phase would be included for the

580 Washington St gas station, northbound & southbound centerline striping to allow for continued access to 579 Washington St, 687 Washington St & 600 Washington St properties.

If MassDOT does not approve of those proposed traffic improvements, it is possible that either a dangerous situation or Interstate's access permit is modified to right-in/right-out as a result. This information is important to know during the planning process, and not to be left to design considerations after the local permitting process.

10 Commerce should consult MassDOT to receive preliminary approval for a Traffic Signal design before presenting it to the Planning Board. The Planning Board should then be able to condition any approval on critical elements of that Traffic Signal. If the Traffic Signal design materially changes after the local permitting process to where certain critical elements are not included in the design, that should necessitate a Planning Board modification to ensure there is not a detrimental impact to abutters or the public.

#### D. Long Queues

During the 15 Commerce application, McMahon and Associates observed the site of the Traffic Signal to observe the significant queues that form on most weekday afternoons from 3-6pm. Since then, the frequency and duration of these queues has increased. The backups occur almost daily and usually multiple times per day, and they often stretch from Madison Street over 2,000 ft past Hawes st.

The proposed Traffic Signal projects a 942 ft queue during the weekday afternoon peak hour, which would extend on top of this existing condition.

Further, once the traffic projections has been analyzed with the additional phase for Interstate Travel Plaza, this queue length is likely to be even longer.

The convenience store/gas station concept for 10 Commerce adds a significant number of additional trips beyond what was proposed for a coffee shop. This would add additional delays and trips to an already overburdened area, and additional mitigation is needed to ensure that a bad problem isn't made worse.

#### E. Parking Bylaw

Environmental Partners commented in their peer review letter about the bylaw requirement for parking spaces for a gas station/convenience store. The bylaw clearly states that the required spaces are 4 spaces /1,000 sq. ft. of convenience store and 1 space/pump. Other projects in the area have also been required to have 1 space per pump fueling position in the bylaw. With the site having 12 independently operated pump controls, 10 Commerce should also

be required to comply with the bylaw as it is written. 12 pumps and 4500 sq ft should require 30 spaces.

F. Recommendations

Since a special permit is being requested, the Board must consider “Whether the site layout serves to facilitate safe and adequate traffic circulation along adjoining public ways through such means as common driveways.” In order to ensure that the site layout does so, we respectfully request that the Planning Board require 10 Commerce to reintroduce mitigations proposed during the Traffic Signal discussion for abutting properties like Interstate Travel Plaza and Turnpike Truck Parts, and require 10 Commerce to receive pre-approval from MassDOT that the key mitigations are satisfactory. We respectfully suggest that the Planning Board condition any approval of 10 Commerce on including such key mitigation in the final Traffic Signal design, so that unexpected and undesirable impacts are not introduced at a later point without returning before the Planning Board for a site modification. We also suggest that the Planning Board require 10 Commerce to comply with the consistent interpretation of the parking bylaw by providing 1 parking space per vehicle pump position.

We anticipate that we will have additional comments to make as the public hearing progresses. Thank you for the opportunity to provide comment.

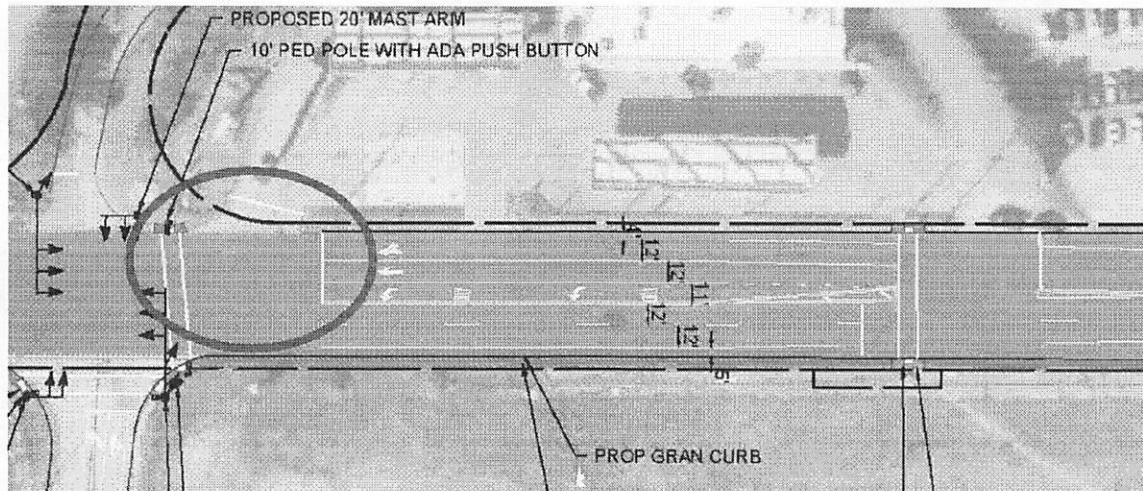
Thank you

  
John Lamparelli

GREAT VIBES

Appendix A

FEIR proposed design with a separate phase and traffic break to allow vehicles to safely cross traffic



Appendix B

SFEIR proposed design that removes the safety elements of a separate traffic phase and traffic break for vehicles exiting Interstate and traveling Northbound.

