

BY ELECTRONIC MAIL: planning@wrentham.ma.us

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

Re: Application for Special Permit/Site Plan Approval – 10 Commerce Blvd. (“Lot 1”)

Dear Members of the Board:

I am commenting on behalf of Turnpike Truck Parts of Wrentham, Inc. (“Turnpike”), which owns and operates an automobile business at 687 Washington Street (Route 1). Turnpike’s property, comprising 19.3 acres, abuts the “Wrentham Business Center,” which is comprised of three lots with access off of Commerce Boulevard, a short, dead-end road that intersects with Route 1 across from Hawes Street. The pending application concerns Lot 1 off of Commerce Boulevard, on which is proposed a convenience store/gas station.

I am writing to provide the Board with response commentary to comments made by Stephen Meltzer of WBH LLC (the “Developer”) during the October 18, 2023 Planning Board Meeting.

A. Waivers For The Easement

While sharing the project updates, the Developer stated that they could present a completely compliant site; however, one of the first things they would do if they were required to comply would be to eliminate the 30 ft potential future easement (the “Potential Future Easement”).

While the Developer has not clearly delineated an easement area on their plans, they have previously described it to be 30 ft wide along the Eastern border of Lot 1. The Developer is requesting a waiver to reduce the setback along this border to 25 ft, so only 5 ft of the Potential Future Easement is outside of the setback.

If the Developer did not request a waiver for the setback along this edge, the Potential Future Easement would be entirely within the 50 ft side-yard setback.

With the Potential Future Easement in the setback, the inclusion of an easement from Turnpike to Commerce Blvd should not have an impact on the Developer’s building plans or waiver requests. The Developer should not have to remove the Potential Future Easement in order to present a project plan to the board that is compliant with setback requirements. The Developer should be able to present the completely compliant site plan without setback waivers that they said they have sketched, and it should have adequate room for an easement.

B. Existing vs. Future Use Clarification

In response to our October 18, 2023 letter to the Planning Board (the “October 18 Letter”), the Developer has commented that they proposed setting aside a Potential Future Easement for when Turnpike develops their property in the future in the spirit of the bylaw.

As discussed at length in our prior comments, a Potential Future Easement does not address the safety concerns and access restrictions that Turnpike has described. The adverse impacts of the Lot 1 project are on Turnpike's current business operations and the current access of the 689, 691, and 693 residential rental properties (the "Rental Properties").

C. Bylaw and Decision-making Criteria

In response to the October 18 Letter, the Developer commented during the October 18, 2023 Planning Board meeting that they are not subject to the bylaw that has provision with regard to interconnections and access.

This reference appears to be to the current zoning for the Route 1 South zoning district (C-1S), whereas they are claiming that the current special permit/site plan approval application for Lot 1 is governed by the Zoning Bylaw in effect in 2017 by virtue of a Zoning freeze.

However, the Developer's claim that they are not subject to the bylaw does not address the issues from the October 18 Letter with respect to the consideration factors for waiver requests in the former Section 6.1, footnote 9 of the Zoning Bylaw.

D. Access No Longer Proposed

As quoted from Wrentham Business Center's Supplemental Final Environmental Impact Report ("SFEIR") submitted to MEPA, the previously proposed access (the "Previously Proposed Access") in the 15 Commerce Blvd planning process and in the Final Environmental Impact Report was removed from the Traffic Signal plan for 10 Commerce along with the separate phase for Interstate Travel Plaza. Below is an excerpt from the SFEIR, and the page is included as Attachment A.

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...¹

As we have detailed in the October 18 Letter, Lot 1's rescinding the Previously Proposed Access is a major step backwards from what was previously included as part of the Wrentham Business Center Lot 1 and Lot 3 combined plans and the 15 Commerce planning process. This access should be required to facilitate safe and adequate traffic circulation in adjoining public ways.

E. Potential Future Easement Issues

The Lot 1 application refers to a 30-ft wide Potential Future Easement. While the actual area has not been specifically identified, it was previously referred to as being against the Southeastern lot line.

¹ SFEIR, p. 35.

This size and location poses several potential challenges. There is a significant elevation of over 20 ft between Commerce Blvd and Turnpike along the lot line, mostly concentrated in a steep incline close to the lot line. The elevations shown in Figure 1 are from the site plan for Lot 1.

For this to be a usable driveway for Turnpike, it would need to include significant investments in infrastructure and maintenance including retaining walls on both sides, guard rails, lighting, stormwater systems, snow storage, signage, and other elements.

It should also be coordinated and incorporated into Turnpike's current business and the rental properties. The area adjacent to the Potential Future Easement is currently a wooded, storage-only section of our lot that is accessible through a locked, gated entrance and isn't currently accessible from any of the rental properties. Figure 2 shows the Potential Future Easement as it relates to Turnpike's business.

The Developer should coordinate an access plan with Turnpike that incorporates the necessary infrastructure and maintenance plans and provides similar access to what Turnpike has now.

Figure 1: Lot 1 elevation as the Potential Future Easement abuts Turnpike's property

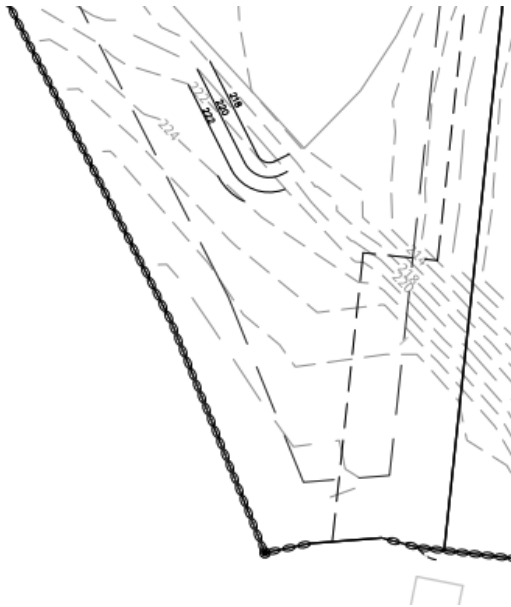
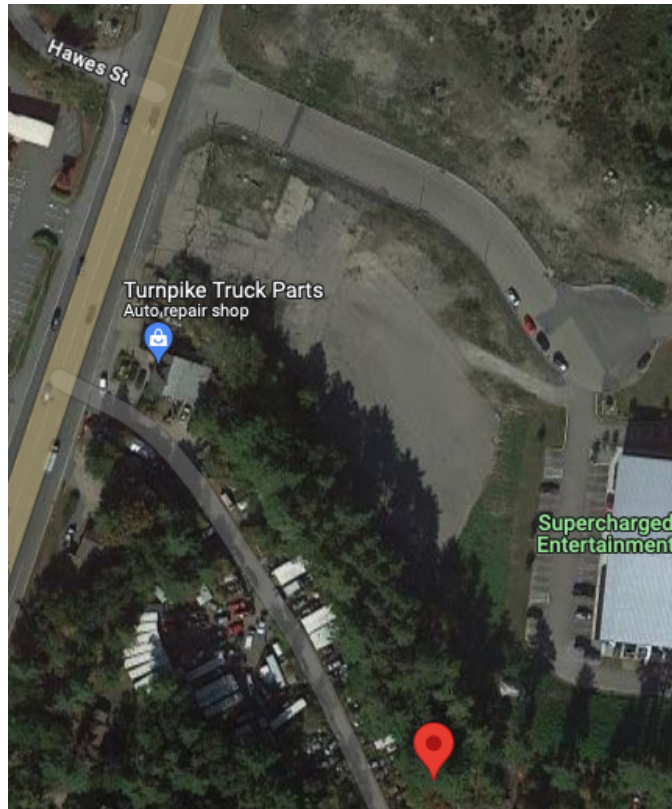


Figure 2: The Red marker shows how far away the Potential Future Easement is to Turnpike's current customer operations, and this wooded area is separated from customer parking by a locked gate.



E. MassDOT Coordination

Lot 1 has held many meetings with MassDOT² as documented in the SFEIR application. However, in the application to the Planning Board, the intersection configuration for the Traffic Signal is presented as an unfinished concept. In the Traffic Impact Study presented as part of Lot 1's application, it says:

[T]he 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.³

In the Final Environmental Impact Report ("FEIR") Certificate, MEPA had ruled that "the project does not adequately and properly comply with the Massachusetts Environmental Policy Act." In that ruling, MassDOT had said the Wrentham Business Center "should

² SFEIR, Page 4

³ Lot 1 Traffic Impact Study, Page 14

incorporate the shared access into their site plan⁴.” The Traffic Signal design and shared access plans should be presented to MassDOT in another meeting to ensure that the concepts discussed during our Planning Process are acceptable to MassDOT. Prior to a Planning Board decision, it is important to know that the Traffic Signal concept we are planning around is more than just a concept.

F. Traffic Engineer Letter

Attachment B is a letter from Vanesse and Associates detailing concerns and safety issues with the stoplight design. These issues and the updated plan for the traffic signal should also be reviewed by Environmental Partners on behalf of the Planning Board with special respect to safety issues raised by abutting properties.

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

Sincerely,

Andrew Gordon

Enclosed:

Attachment A SFEIR Page 41.pdf

Attachment B 2023_1023 Vanasse Letter to MEPA EEA 15765.pdf

⁴ FEIR Certificate, Page 72

and bicycles along Route 1. With that, the Wrentham Business Center project team would coordinate with MassDOT during the access permitting process to align the proposed improvements as part of this development with the proposed Route 1 corridor design.

As outlined in the previous FEIR filing, transit access to and from the project site would be provided by the Greater Attleboro Taunton Regional Transit Authority's (GATRA) current micro transit service, GATRA GO. During a previous meeting with GATRA, it was noted that there are no current plans to provide fixed service to the Commerce Boulevard area. The ability to track ridership through their GATRA GO service would provide them with the opportunity to evaluate future transit needs at the project site. Should the demand of fixed service become apparent through a review of the available micro transit service ridership, GATRA would coordinate with the proponent to discuss potential options for additional transit service, including potential fixed route service, at that time. Based on this previous coordination, no additional modifications to the proposed project are anticipated.

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. Due to the MassDOT jurisdiction along Washington Street (Route 1), the project will be required to obtain an access permit from MassDOT for the proposed signal and intersection improvement work. Additional refinement to the signalization at the Hawes Street/Commerce Boulevard intersection and the timings along the Washington Street (Route 1) corridor are expected. The required permitting in addition to the ongoing MassDOT Washington Street (Route 1) corridor project would result in additional coordination with MassDOT regarding the proposed signalization of Hawes Street.

The local review of the Lot 1 gas station and convenience store development is ongoing at the time of this filing. An easement area over Lot 1 has been reserved in order to accommodate potential future shared access, but no specific development or access plans have been finalized with the abutter to the south. Based on discussions with MassDOT District 5, any changes to property access along the corridor from the Washington Street (Route 1) corridor project would be fully assessed and managed through that process.

4.5 Traffic Operations Analysis

In previous sections of this report, the quantity of traffic at the study area intersections has been discussed. The following sections describe the overall quality of the traffic flow at the study area intersections during the weekday morning, weekday afternoon, and Saturday midday peak hours. As a basis for this assessment, intersection capacity analysis was conducted using the Synchro

Ref: 9830

October 25, 2023

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
100 Cambridge Street, Suite 900
Boston, MA 02114

Attn: MEPA Office
Purvi Patel, Analyst
EEA No. 15765

Re: EEA No. 15765, Wrentham Business Center
Comments on the SFEIR
On behalf of Turnpike Truck Parts
687, 689, 691, 693, 705 & 805 Washington Street, Wrentham

Dear Purvi:

Vanasse & Associates, Inc., on behalf of our client Turnpike Truck Parts (TTP), 687 Washington Street, Wrentham, is pleased to submit comments on the Supplemental Final Environmental Impact Report (SFEIR) for the Wrentham Business Center, EEA File No. 15765 (the "Project"). TTP owns the properties at 687, 689, 691, 693, 705 & 805 Washington Street on the east side of Route 1, south of Commerce Boulevard. These properties are expected to be impacted by the proposed traffic signal improvements at the intersection of Route 1 and Commerce Boulevard associated with the subject development. We have reviewed the SFEIR and the proposed traffic signal mitigation as they relate to vehicular access to TTP's properties. The following items are rooted in the goal of ensuring that safe and efficient access and egress is achieved at the TTP property driveways and throughout the network used by their customers.

- Access via Commerce Boulevard.
 - Access provisions to the TTP properties were a clear recommendation by MassDOT on the FEIR (See the attached excerpts for reference). There does not appear to be any mention of this access accommodation in the SFEIR. Additionally, the proponent for Lot 1 recently filed site plans¹ with the Wrentham Planning Board which do not include accommodations for access to Commerce Boulevard to TTP properties.
 - We recommend that the Project provide a 30-foot-wide² paved driveway, with 30-foot corner radii, within a 50-foot right of way from the TTP property to Commerce Boulevard, recorded at the registry of deeds, prior to constructing the signalization of the intersection. The right of way should accommodate the appropriate retaining walls, lighting, snow, and

¹ The property was subdivided into 3 lots in 2017. Lot 2 has been developed as Supercharged Entertainment. Lot 3 has been approved by the Wrentham Planning Board as a proposed warehouse development, and Lot 1 is currently in front of the Wrentham Planning Board as a proposed gas station/convenience store development.

² The recommendation for 30 feet wide is based on the MassDOT Project Development and Design Guide, dated 2006. *Exhibit 15-1 - Basic Driveway Dimension Guidelines* recommend that two-way commercial driveways be 30 feet wide.

maintenance areas needed for the paved surface. We also request that the Project work with TTP to facilitate an on-site connection from TTP's operations to the new right of way.

- The proposed signal improvements should include driveway modifications to the TTP driveways at Route 1 for right-in/right-out operations.
- Based on the omission of this information in both the SFEIR and Lot 1 site plans currently under review with the local planning board, we request that these items be included as required mitigation in the Section 61 Finding. These recommendations are based on the following anticipated impacts to the full access driveway accommodations to the TTP properties:
 - The existing northbound outside travel lane and shoulder in front of the driveways owned by TTP is a consistent 22 feet wide, although the lane and shoulder widths vary, and accommodates vehicles decelerating to access the driveways without impacts to through traffic. In the proposed Signalization Conceptual Plan included in the SFEIR the outside travel lane and shoulder would be 17-feet in width. This is narrower than most other driveway locations along Route 1 in this area, which all have 8 to 10-foot shoulders or a wide combination of shoulder and through-lane.
 - The installation of a left-turn lane on Route 1 northbound along the TTP properties creates an unsafe left-turning condition for these properties. Queued vehicles on the northbound approach to the Commerce Boulevard intersection would require that left-turning vehicles entering and departing the TTP properties have to negotiate through one to three rows of stopped vehicles to turn left, restricting sight lines in either direction and introducing opportunities for “courtesy” crashes.
 - The installation of the signal immediately north of the TTP properties, regardless of the left-turn lane installation, creates a situation where southbound vehicles destined for the TTP properties stop just after the signal, an unexpected condition that could present a higher potential for rear end collisions.
- We expect these access challenges will be introduced to several of the existing driveways that abut the proposed signal improvements. MassDOT may also see the need to formally restrict left-turn movements at the existing driveways due to the introduced safety challenges. The Project should consider constructing access to the traffic signal via Commerce Boulevard and Hawes Street for properties with impacted driveways on the east and west side of Route 1, respectively, including 687, 689, 691, 693, 705 & 805 Washington Street.
- Consideration for the introduction of u-turn accommodations at Madison Street and Thurston Street may help to alleviate left-turn restrictions to driveways at properties that do not directly abut the Project and are impacted by the signal improvements.



- Confirmation of anticipated property and driveway impacts.
 - Has the proposed cross section been confirmed with MassDOT? It is beneficial for TTP and other project abutters to understand the potential private property impacts needed to construct the traffic signal. The Signalization Conceptual Plan included in the SFEIR depicts 4-foot shoulders and no bike or pedestrian accommodations. Route 1 has 8-foot shoulders and MassDOT requires bike and pedestrian accommodations on all projects; otherwise, a Design Exception is required. We also understand that this section of Route 1 accommodates temporary traffic control setups essential for Gillette Stadium events that utilize the shoulder as an additional travel lane. It does not appear that this factor was considered in the intersection design.
 - The northbound left-turn lane appears to accommodate a short queue length. After accounting for lane change and deceleration length for a 55-mph design speed, there is only room for one stored car. Has there been any adjustment in the anticipated left turns to Hawes Street when a signal is installed since the signal will accommodate a convenient short cut for west-bound vehicles to Thurston Street? This opportunity for taking lefts at Hawes Street will be more desirable when the northbound traffic is experiencing delays during peak hours. Anticipated through-queues approaching Thurston Street block access to the 225-foot-long northbound left turn lane to Thurston Street during all 2030 peak periods. We recommend that the anticipated left turn volume to Hawes Street be confirmed and that the left turn lane length be adjusted so that driveway impact, property impacts, and traffic impacts on Hawes Street can be properly understood during the MEPA review.
 - There is an existing truck climbing lane on Route 1 northbound between Madison Street and Commerce Blvd. This lane is not shown on the Signalization Conceptual Plan included in the SFEIR. It appears that the pavement width is being reallocated for the left turn lane to Hawes Street. We recommend that the need for the left turn lane and its contribution of trips on Hawes Street be compared to the need for the climbing lane, and that this comparison be confirmed with MassDOT and the Town.

The Project represents a notable improvement to properties along Route 1 in Wrentham. The proposed traffic signal appears well intentioned to accommodate access to the Project development. With minor modifications to the proposed signalized intersection and site to optimize access at adjacent impacted properties, we can realize the traffic signal as a safety and economic benefit to the existing establishments in addition to the future development. On behalf of TTP, we appreciate your attention to the feedback from TTP and project abutters.

Sincerely,

VANASSE & ASSOCIATES, INC.



Jake P. Carmody, P.E.
Associate

Enclosures

cc: David Soares - MassDOT District 5 Traffic Engineer
Andrew Gordon – Turnpike Truck Parts



previously mentioned, Phase 2 will remove the basin on Lot 3 within the Zone A and reconstruct it outside the Zone A. The FEIR addresses the jurisdiction status of the existing stormwater basin to be decommissioned and filled as it relates to the definition of a “Pond” pursuant to 310 CMR 10.04. It indicates that during discussion of the Abbreviated Notice of Resource Area Delineation (ANRAD) on July 22, 2021, the WCC was asked to confirm that storm water basin (B-1) was not jurisdictional, and the WCC confirmed that interpretation.²

The project includes installation of a stormwater management system that exceeds requirements identified in the SMS and local by-laws. Several man-made ponds for surface water management and roof runoff will be used to provide groundwater recharge. Pretreated surface runoff from parking lots and roadways will also be partially used to recharge groundwater. Rabbit Hill Brook has been designated as an ORW as a tributary to a surface water supply and requires enhanced storm water management under 310 CMR 10.00 and the SMS to provide further treatment of runoff prior to discharge to the new storm water basin proposed on Lot 3. Treatment measures include a separate roof drain system to directly discharge clean runoff from roofs to the infiltration system, and tree box filters where possible in addition to deep sump catch basins. The FEIR indicates that an updated storm water design for the project was submitted for local review by the Wrentham Planning Board and WCC (and also peer reviewed) to demonstrate the efficacy of the drainage system (Appendix E).

Traffic and Transportation

The project abuts Route 1 (Washington Street), a state highway; therefore, a MassDOT Vehicular Access Permit is required. The FEIR includes an updated Transportation Impact Assessment (TIA) prepared in conformance with the current MassDOT/EOEEA *Transportation Impact Assessment Guidelines*. The study includes an assessment of the transportation impacts of the project and analysis of site access in the immediate vicinity of the project. At present, there is an approved MassDOT project in the design stage to improve conditions along this corridor. According to MassDOT comments, there are still some key concerns raised in the MassDOT comment letter on the DEIR that are not addressed in the FEIR as described further below; these outstanding concerns should be addressed in the SFEIR. Although the Proponent met with MassDOT during preparation of the FEIR (December 2021) to discuss technical issues associated with the TIA, the Proponent did not follow up with MassDOT to address some of the issues regarding phasing and timing of implementation of the mitigation program.

Site access is proposed via an existing access driveway (Commerce Boulevard) onto Route 1 opposite Hawes Street. The Proponent proposes to redesign and signalize this intersection to address impacts associated with the increase in site traffic. The DEIR included a traffic signal warrant analysis (TSWA), which indicated that this intersection meets Warrants 1, 2, and 3 under 2028 Build conditions. However, MassDOT comments on the DEIR identified concerns regarding the immediate installation of the traffic signal on Route 1 based on the use of future volumes as justification because it normally requires provision of traffic counts. In this particular case, if Phase 3 is delayed to a later date, it is unlikely that the traffic signal would be approved because Phase 2 is unlikely to generate enough traffic to meet signal warrants to justify installation of the traffic signal. The FEIR provides a discussion of the timing and need for the signal at the site access driveway and existing safety concerns along the Route 1 corridor due to high traffic volumes on Route 1 and turning movements at the numerous driveways along Route 1 in this area. While the FEIR includes a revised TSWA in response to MassDOT

² The FEIR includes a copy of the minutes of the meeting on July 22, 2022 in Appendix B.

comments, it continues to use future volumes to justify installation of the traffic signal during Phase 2. The Proponent was directed to work with MassDOT during preparation of the FEIR to clarify the schedule of the project, and if necessary, discuss an interim access plan for Phase 2 only. The FEIR indicates that the Proponent does not anticipate interim access to be necessary prior to construction and occupation of the warehouse; however, this assumption was not confirmed with MassDOT during consultation and MassDOT comments indicate that the FEIR does not offer a clear timeline for advancing Phase 3.

I received comments from several abutters and residents which identify concerns regarding project-related traffic, safety and operation of adjacent uses. These comments (from Attorney Jonathan M. Silverstein, submitted on behalf of the owners of four abutting or adjacent properties; a resident of Hawes Street; and Turnpike Truck Parts) indicate that the project, coupled with the proposed signalization and signage of Route 1/Hawes Street will impact the functioning/safety of Hawes Street and the developability of lots with frontage on Hawes Street; has not provided connectivity to allow internal circulation with the abutting property to the north (579 Washington Street) to improve safety and traffic flow; has not evaluated an alternative to move the proposed signal further north to provide better spacing of traffic signals along the corridor, mitigate queuing that will prevent left-turns into adjacent properties, and avoid overuse and cut-through traffic of Hawes Street; and has not identified potential access to Commerce Boulevard for Turnpike Truck Parts to mitigate potential impacts to existing access to Interstate 495 (I-495).

The FEIR indicates that a future vision for comprehensive bicycle and pedestrian accommodations on the Route 1 corridor has not been identified by MassDOT. Once a future corridor plan has been identified, the Proponent will work with MassDOT to implement pedestrian and/or bicycle accommodations within the existing right-of-way adjacent to the project site that work towards the planned vision. The Proponent is reminded that any proposed improvement on state highways should be consistent with the MassDOT Healthy Transportation Initiative. The Proponent should continue discussions with MassDOT to obtain any necessary waivers if bicycle facilities cannot be provided along Route 1.

The Greater Attleboro Taunton Regional Transit Authority (GATRA) provides fixed route bus service (Route 14) along Route 1 in the Town of Plainville, ± 2.5 miles to the south of the project site. The Proponent met with GATRA in October 2021 to discuss the potential for extending fixed route bus service along Route 1. The project site is currently served by micro-transit services including GATRA-GO, an on-demand service that allows riders to request same-day service for transportation services. The FEIR does not describe any additional consultations between the Proponent and GATRA during preparation of the FEIR nor does it document the input from GATRA regarding infrastructure needed to support the service extension. The Proponent will continue to coordinate with GATRA and has proposed internal site infrastructure to support transit service to the project site. The Proponent should work toward identifying the details of TDM measures and consult with the local Transportation Management Association to help implement the TDM program.

Greenhouse Gas Emissions

The FEIR includes a revised GHG analysis which generally responds to recommendations outlined in the comments from the Massachusetts Department of Energy Resources (DOER) on the



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Jamey Tesler, Secretary & CEO



MEMORANDUM

TO: David J. Mohler, Executive Director
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E, Manager
Public/Private Development Unit

DATE: November 9, 2022

RE: Wrentham – Wrentham Business Center: FEIR
(EEA #15765)

The Public/Private Development Unit (PPDU) has reviewed the Final Environmental Impact Report (FEIR) for the proposed Wrentham Business Center project in Wrentham by ND Acquisitions, LLC (the “Proponent”). The 31.1-acre site is proposed to be developed in three phases into a mixed-use commercial and warehouse development (the “Project”). The site is located along the east side of Route 1 in Wrentham (589-591 Washington Street).

The Project consists of a mixed-use commercial development to be built in three phases. Phase 1 consists of a 116,000-square foot (sf) indoor recreation facility, which has already been completed; Phase 2 would entail the construction of a 180,000-sf warehouse; and Phase 3 would consist of a drive-through coffee shop and family restaurant. According to the FEIR, Phase 3 is in the design stage and have yet to receive local approvals but is expected to be built at a later date.

Based on information included in the EENF, Phase 1 of the Project was expected to generate 328 vehicle trips on an average weekday and 372 vehicle trips on an average Saturday. According to the DEIR, the Project is expected to generate 2,608 additional vehicle trips for Phase 2 & 3. The project abuts Route 1, a state highway; therefore, a MassDOT Vehicular Access Permit is required.

The FEIR includes an updated Transportation Impact Assessment (TIA) prepared in conformance with the current MassDOT/EOEEA *Transportation Impact Assessment Guidelines*. The study includes an assessment of the transportation impacts of the Project and analysis of site access in the immediate vicinity of the Project. However, there are still some key concerns raised in the MassDOT comment letter in the DEIR that are not addressed in the FEIR. During the preparation of the FEIR, the Proponent met with MassDOT to discuss some of the technical issues associated with the TIA; however, there were no follow up to address some of the issues regarding phasing and timing of implementation of the mitigation program. MassDOT offers the following comments that should be addressed prior to the issuance of a Section 61 Finding for the Project.

Access and egress to the site is proposed via an existing access driveway (Commerce Boulevard) onto Route 1 opposite Hawes Street. As part of the DEIR, the Proponent proposed to redesign and signalize the intersection to address impacts associated with the increase in site traffic. The DEIR included a traffic signal warrant analysis (TSWA) based on the 2009 Manual on Uniform Traffic Control Devices (MTUCD). MassDOT specifically commented that future volumes were not to be used to conduct the TSWA and justify the installation of a traffic signal. The TSWA was revised in the FEIR, but it is still based on 2028 Build volume projections on Route 1 instead of Route 1 traffic volumes at site occupancy.

Second, MassDOT indicated that Phase 2 was unlikely to generate enough site traffic to meet the signal warrants and justify the installation of the traffic signal. As per the FEIR, the Proponent did not offer a clear timeline to advance the Phase 3 component of the Project. In the DEIR comment letter, MassDOT requested that an interim access plan be provided that did not include the traffic signal. This is not addressed in the FEIR.

Last, the Proponent has indicated that properties south of the site along Route 1 could be provided access to the proposed traffic signal at their site driveway via an internal shared roadway connection. This would allow traffic from these sites, particularly the Truck Turnpike site, the ability to safely reverse direction towards Route 1 southbound to access I-495. The Proponent has accounted for the trips associated with the facility in the TSWA and the capacity analysis for the Route 1 intersection with the Project site driveway. However, the Proponent was vague on any arrangement with the owner of the Truck Turnpike site to facilitate or implement this connection. The Proponent should incorporate the shared access into their site plan and document initial approval or formal arrangement to justify these volumes in their analysis. Additionally, the site driveway of the Truck Turnpike site may need to be modified to ensure it operates as right-in, right-out driveway to prevent unsafe maneuvers on Route 1.

The Proponent should continue working with MassDOT to revise the TSWA, review access management along the Route 1 corridor in the vicinity of the site and document any agreement/arrangement in place to facilitate the implementation of an access management plan. The Proponent should submit a revised commitment letter to MassDOT once these details have been finalized. The Draft Section 61 Finding will be the basis for MassDOT to issue a final Section 61 Finding for the project.

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.