

August 8, 2022

Jennifer S. Hager, Planning & Economic Development Director
Sutton Town Hall
4 Uxbridge Road
Sutton, Massachusetts 01590

Via: Email to j.hager@town.sutton.ma.us

Reference: Response to Comments
Lackey Dam Logistics Center
3 Lackey Dam Road
Sutton, Massachusetts
B+T Project No. 3077.06

Dear: Ms. Hager:

On behalf of the Applicant, US MA Development, LLC, Beals and Thomas, Inc. (B+T) respectfully submits this response to a review letter prepared by the Sutton Planning and Economic Development Director, Jen Hager, dated June 20, 2022 pertaining to the proposed warehouse distribution building at 3 Lackey Dam Road in Sutton, Massachusetts.

For clarity of the Administrative Record, comments are provided in *italics* below, followed by our current response in bold **detailing** how the comment has been addressed.

General

- *The decision of the Sutton Conservation Commission will be integral to the development of this project in the manner shown. If wetland filling and replication is not approved by the Conservation Commission, the applicant will have to seek a Superseding Order from the Department of Environmental Protection or the project will have to be re-designed. Therefore, in this case, I would recommend the Board hold their action until a decision is reached by the Conservation Commission.*

B+T Response: The project team is currently working with the Commission and their peer review consultant to modify the design plans to eliminate the wetland filling and limit the disturbance within the Adjacent Upland Resource Areas (AURA).

- *Grading is shown within the front setbacks at the entrance to the project in Sutton. This is not allowed.*

B+T Response: The grading will be adjusted to reflect the limit of disturbance being removed from the front setback in Sutton.

- *The applicants shall provide a means to block headlights from the properties directly opposite on Lackey Dam Road.*

B+T Response: The Applicant is willing to explore options to shield headlight from the properties directly across from the site driveway on Lackey Dam Road including providing landscape screening on abutter's property.

- *In the pre-filing meeting, the Fire Chief requested a slide gate at the emergency access. Please consult with the Chief and provide the appropriate gate on the detail sheets.*

B+T Response: The project team will work with the Fire Chief to provide a slide gate acceptable to the Fire Department and incorporate a detail of the gate into the project plans.

IV.C. - Site Plan Review

- a. *Signature block should say "Sutton Planning Board Approval"*

B+T Response: The signature block will be modified as requested.

- c. *Show all certified abutters within 300' on Sheet TP-1 including those north of the project across Oakhurst Road.*

B+T Response: The abutters within 300 feet of the property will be added to Sheet TP-1.

- d. *Please indicate abutting land uses, perhaps on sheet C1.1. Is the indicated contiguous upland in Sutton just the contiguous upland north of the southern wetland?*

B+T Response: The abutting land uses will be added to Sheet C1.1. The upland contiguous area is the land in Sutton between the two wetland resource areas.

- e. *Clearly show all exterior entrances.*

B+T Response: The plans will be updated to show all exterior entrances.

- f. *If the enclosure west of the structure mid-way along the truck docks is a trash enclosure, please label it and show fencing details on the detail sheets, if not, please show the location and screening details for waste disposal containers. Provide a cut sheet/brochure for the retaining wall block to be utilized as the detail sheet description "Compact III – straight – gray" does not clearly define which specific product is to be utilized. This block should be aesthetic at least on the southeast and northwest exposures where walls are a significant feature that may be seen. Please utilize wood beam guardrail and adjust the detail sheet.*

B+T Response: The enclosure west of the structure is the proposed transformer pad area. The plans will be updated to depict the proposed dumpster location with appropriate screening. The plans will be updated to provide additional detail on the retaining wall block. The Applicant agrees to use a wood beam guardrail and the detail sheet will be updated to reflect the change.

- g. *The photometric plan appears to show light spill onto private property across Lackey Dam Road at the entrance. While we want to ensure this intersection is well lit, we do not want light trespass onto abutters. There is concern that while illumination may not affect residents across Lackey Dam Road, that particularly in the area of #2 & #6 Lackey Dam and the residents in Uxbridge directly across the street from the entrance may find themselves looking up into the fixtures of the 25' high light poles and building mounted luminaires. This should be considered in positioning of lights and angling of light heads.*

B+T Response: The photometric plan shows limited light spillage onto Lackey Dam Road associated with appropriately lighting the site driveway intersection with Lackey Dam Road. The Town of Uxbridge has requested that the proposed intersection, which is located in Uxbridge, be lighted for safety.

- h. *Show the entrance sign location.*

B+T Response: We will add the location of the entrance sign to the revised plans.

- i. *Add evergreens to proposed landscaping, preferably faster growing varieties, no white pines. Much of the existing cover to remain is deciduous and a portion of the required zoning line setback is not vegetated at all as it is within the roadway right of way.*

Therefore, particularly from #12 Lackey Dam Road south, where coniferous trees are sparse, additional coniferous landscaping should be considered to achieve reasonable buffering between the project and residents. Homes along this stretch are already 15-30' lower at floor elevation so the project will be more visible and requires extra consideration.

B+T Response: We will incorporate additional landscape plantings as requested into the revised plan set at the main entry, the emergency access entry as well as along Lackey Dam Road.

- n. *Traffic flow patterns need to be shown within the site.*

B+T Response: The plans will be updated to show traffic flow patterns.

- p. *Architectural ornamentation/interest should be increased along the south elevation and at least the first 200' +/- of the adjoining east elevation as these will be the most visible portions of the building. Consider additional windows, which will also benefit employees. and or use of stone face, etc.*

B+T Response: The developer will work with architect and town staff to add architectural elements to the south and a portion of the east elevation. This will be incorporated into the elevations that are being prepared to depict building height.

IV.B. - Parking Regulations

- *Show the math for parking calculation in table on plan set. IE: Office requires 1space per 250 s.f. $10,000s.f./250s.f. = 40$ spaces.*

B+T Response: The parking calculation numbers will be shown on the revised plans.

- *4.c. – Driveway is wider than 30'. **Waiver requested.***

B+T Response: We look forward to discussing the waiver request with the Planning Board.

- *5.c.2. – 5% interior lot landscaping does not appear to have been achieved, show the math for the amount of interior lot landscaping that has been provided. **Waiver requested.***

B+T Response: We look forward to discussing the waiver request with the Planning Board.

- *5.c.3. - Rows of parking exceed 100' with no landscape islands. **Waiver requested.***

B+T Response: We look forward to discussing the waiver request with the Planning Board.

- *Show and provide conduit /equipment for electric vehicle parking.*

B+T Response: The Applicant will provide conduit for EV parking spaces within the employee parking area.

III.A. 4. Table 1. F.6. & VII.A.2.- Special Permit – Warehouse with Distribution Use
Before acting on this request, the Board must make findings with respect to the following criteria with or without conditions.

- 1. The appropriateness of the specific site as a location for the use;*
- 2. The adequacy of public sewerage and water systems;*
- 3. The effect of the developed use upon the neighborhood;*
- 4. Whether there will be undue nuisance or serious hazard to vehicles or pedestrians; and,*
- 5. Whether adequate and appropriate facilities will be provided to ensure the proper operation of the proposed use, structure, or condition.*

B+T Response: We look forward to discussing the special permit findings with the Planning Board.

III.B.3. Table 3 – Footnote ** & VII.A.2. - Special Permit – Building Height in Excess of 35'

- *The necessary height calculated with all contingencies is 44.2', but the height request is 50'. It would appear there is no current reason to grant a height above 45'.*

B+T Response: The Applicant is currently working with the Project Attorney to prepare updated building elevation plans. We anticipate that a special permit for a height of 45 feet will be sufficient.

Before acting on this request, the Board must make findings with respect to the following criteria as they relate to a height increase with or without conditions. IE: Is the specific site appropriate for the use at the requested increased height.

- 1. The appropriateness of the specific site as a location for the use;*
- 2. The adequacy of public sewerage and water systems;*
- 3. The effect of the developed use upon the neighborhood;*
- 4. Whether there will be undue nuisance or serious hazard to vehicles or pedestrians; and,*
- 5. Whether adequate and appropriate facilities will be provided to ensure the proper operation of the proposed use, structure, or condition.*

B+T Response: We look forward to discussing the special permit request for height in excess of 35 feet with the Planning Board.

Traffic Study

- *100% of truck traffic is expected to travel to and from Route 146 via the shortest/fastest route. Add “TRUCKS – NO left turn” signage at the exit and show signage in traffic sign summary table.*

B+T Response: The requested sign will be added to the site plans.

- *When examining the ITE codes and descriptions, it would appear ITE Land Use Code 154, High Cube Warehouse – Short term and Transload is a more appropriate Use Code.*

B+T Response: After discussing the Project with the development team and reviewing the components of the site plan the ITE Trip Generation manual was reviewed to identify the land use that most accurately represented the land use being considered. In this case, it was determined that ITE’s land use code 150 (Warehousing) is the most appropriate use for this development. The use of this land use code is consistent with the code used for the recently approved adjacent Blackstone Logistics warehouse development which is expected to have operations that will be similar to the proposed project at 3 Lackey Dam Road. The methodology used for the adjacent Blackstone Logistics development was reviewed by MassDOT traffic staff during the permitting of that project and the assumptions relative to land use code were found to be acceptable.

Further, it is expected that the Town will impose a pre-occupancy validation as well as post-construction traffic monitoring requirements to validate traffic study findings, which provide additional opportunities to address any material differences in tenant specific trip estimates and traffic impacts. Nonetheless, based on the above comment, a comparative trip generation analysis was performed using ITE LUC 154 as suggested by the town. The comparison indicates that the trip generation used in the traffic study is higher than trip estimates based on LUC 154. Since the study has been prepared using the higher of the two estimates, no revisions to the trip generation methodology is required. Table 1 below summarizes the trip estimates using the two different land use codes.

Note: Since the submittal of the May 18, 2022 traffic study, the overall size of the development has been reduced in response to comments from the Conservation Commission. The traffic study is currently being updated to reflect the smaller development size as well as other technical peer review comments. While the revised study will be based on lower trip generation numbers than those presented in the original study, the finding that LUC 150 yields higher trip generation than LUC 154 for the development size being considered, will remain valid.

Table 1 Trip Generation Comparison (LUC 150 vs. LUC 154)

Time Period	Movement	ITE LUC 150 ¹	ITE LUC 154 ²
Weekday Daily ³	Enter	193	154
	Exit	<u>193</u>	<u>154</u>
	Total	386	308
Weekday AM Peak Hour ⁴	Enter	39	14
	Exit	<u>12</u>	<u>4</u>
	Total	51	18
Weekday PM Peak Hour ⁴	Enter	15	6
	Exit	<u>38</u>	<u>16</u>
	Total	53	22

1 Based on ITE LUC 150, for a 220,000 sf warehouse-distribution facility; from Lackey Dam Road Logistics Center Traffic Study (VHB 5/18/22)

2 Based on ITE LUC 154, for a 220,000 sf High-Cube Transload and Short-Term Storage Warehouse facility

3 Vehicles per day

4 Vehicles per hour

- 52% of auto traffic is estimated to use Oakhurst. Please calculate left-turn lane warrant at build for north-bound left turn lane at Oakhurst. Show the addition of approach center and side lines for at least 100' along Oakhurst Road at its intersection with Lackey Dam Road.

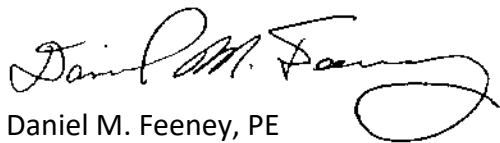
Jennifer S. Hager, Planning & Economic Development Director
Sutton Town Hall
August 8, 2022
Page 8

B+T Response: As noted earlier, the traffic study is being revised to reflect a smaller development plan. The updated study will include the left turn lane warrant analysis that has been completed for Lackey Dam Road at Oakhurst Road, which shows that a left turn lane is not warranted. As requested by the Town, the Applicant commits to re-striping the approach center and side lines for at least 100' along Oakhurst Road at its intersection with Lackey Dam Road.

Should you have any questions regarding this matter or require additional information, please contact us at (508) 366-0560.

Very truly yours,

BEALS AND THOMAS, INC.



Daniel M. Feeney, PE
Vice President

cc: Mark L. Donahue, Esquire; Fletcher Tilton P.C.
Todd Brodeur; Fletcher Tilton P.C.
Leo Leighton, US MA

DMF/mac/307706LT002