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TOWN OF SUTTON PLANNING BOARD & DEPARTMENT

March 13, 2023

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: EEA# 16666 – Cubes at Pyne, Douglas/Sutton

Secretary Tepper:

The Town of Sutton Planning Board would like to provide the following commentary relative to the Environmental Notification Form (ENF) submitted for the Cubes at Pyne project that straddles the Douglas/Sutton town line.

Our first concern is traffic impact. Based on traffic studies for similar projects, the majority of the projects 4,700+/- trips will likely be traveling north and impacting the intersection of Route 146 and Boston Road as well as Central Turnpike to some degree. Employee trips may also impact more immediate local roads like Hough Road and Whitins Road. As you are aware, numerous large projects exist or are imminent that will directly impact the Route 146 corridor, and many are significant truck trip generators. While it is not equitable for one project to bear the entire cost of being the one that pushes safety and capacity past the tipping point, we feel strongly there has to be a mechanism for each of these significant traffic generators to contribute to the transportation/safety improvements that will absolutely be necessary sooner than later along the corridor. Tax revenues from these generators will not cover the magnitude of these costs.

The second, although related, concern is environmental impact. Replanting significant numbers of trees and a reflective roof are beneficial. However, the project is creating over 115 acres of new impervious surfaces. The project will also relocate, and likely utilize, a concrete plant whose industry production accounts for nearly 10% of green-house gas (GHG) emissions. The ENF indicates minimal proposals for mitigation of the heat, carbon, and energy impacts. What construction and building systems will be utilized that reduce environmental impacts and long term energy use? Why are no green building and/or energy systems noted in the ENF to offset some of the GHG production on the site?

Lastly, there are various inconsistencies within the ENF that should be corrected/addressed. New impervious is clearly quantified in the ENF form as 115+ acres, however in other parts of the ENF impervious area is shown as less than half this amount. Existing height of structures is listed as 73.3 feet, however this is a cement processing tower, not an occupied building, which is a little misleading. The tallest occupied building on this site is likely less than 20'. A development of 2.8 million square feet at nearly 77' high will be a stark difference.

Sutton is absolutely in favor of more tax base development as well as the creation of a wide range of job and housing opportunities within our limited commercial and industrial districts. This project will create more tax base, but not so much a wide range of jobs and no housing, but as the use is allowed by Special Permit within our Zoning, if it meets Special Permit criteria, the Town has little say in this respect. However, the proposed project will also have impacts in and beyond Sutton that must be thoroughly understood and mitigated.

We request the State's assistance in ensuring the effects of this project, and the cumulative effects of this and other projects being developed along the Route 146 Corridor, are mitigated. These efforts are essential to ensure the long term viability of working, living and thriving within the Blackstone Valley.

Thank you in advance for your consideration of our input. Feel free to reach out to our Planning Director for any questions or clarifications.

Sincerely,

William Talcott, Chair
Sutton Planning Board

cc: Alexander Strysky, MEPA
Sutton Town Manager
Sutton Select Board
Barry Lorion, Director, District 3 MassDOT
Central Massachusetts Regional Planning Commission
Christina Lyons, Epsilon
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