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July 25, 2022

120344-17

By Email

Sutton Planning Board
Sutton Town Hall
4 Uxbridge Road
Sutton, MA 01590
Attn: Jennifer Hager, Sutton Planning Director
Email: j.hager@town.sutton.ma.us

Re: UGPG RE Sutton LLC
Unified Buildings 2 and 3 (40 & 42 Unified Parkway) (the "Project")
Providence Road/Boston Road, Sutton, Massachusetts

Dear Members of the Sutton Planning Board (the "Board"):

On behalf of UGPG RE Sutton LLC (the "Applicant"), this letter is intended to address written public comments for the Project received today from Christine Watkins of 65 McClennan Road in Sutton. Ms. Watkins's comments and the Applicant's responses are set forth below:

1. **Comment:** I recall a question at one of the meetings regarding the hours of construction operation. I believe there was a statement made that Saturday construction would cease at noon. Condition 1 states construction could continue to 5 pm. A review of the minutes did not indicate this comment and I was not able to review the video of every meeting. I believe the question may have been posed by Marie Decosta. Please review. Construction through an entire day of a weekend seems intrusive to residents.
- **Response:** The Applicant is not aware of any discussion at the public hearings for the Project regarding ceasing Saturday construction at 12PM.
2. **Comment:** At the June 27 meeting I believe I questioned why 2014 was used as an historical point for adjusting the October 2021 traffic volumes related to Covid when the Market 32 Plaza project did not begin operations until October 28, 2015? I do not believe this was satisfactorily answered by the applicant nor addressed by the peer reviewer. I did leave a message with Ron Mueller Associates to get their thoughts on this but did not hear back. The traffic at the Boston Rd intersection is significantly increased by the volume of traffic from this plaza. How would an understatement of traffic volume used as a basis for the traffic study impact condition 12 and the peak volume calculations during the monitoring period and how is the projected volumes in the traffic study accurate if the comparison year of 2014 is significantly understated post Market 32 construction traffic volumes?
- **Response:** Traffic counts in the Project's Traffic Impact Assessment were conducted in 2021. MassDOT issued a Covid 19 traffic adjustment methodology in 2020 that applies to all new

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traffic studies in the state that are initiated during Covid-19. The methodology requires the Applicant to not only follow the DOT methodology but also obtain MassDOT's concurrence on the adjusted data that it is suitable for use in traffic studies. The adjusted data the Applicant used for the Project went through that validation process and obtained MassDOT's concurrence. With respect to the use of 2014 data, the Covid 19 methodology imposed by MassDOT includes reviewing traffic data dating back to 2014 in order to develop the appropriate adjustment factors to apply to the 2021 traffic data. The 2014 data is also accompanied by traffic counts from 2016 and 2017 – after the opening of the Market 32 project – to create the Covid-19 adjustment factor to use for these areas (see p. 154 of original Traffic Impact Evaluation prepared by VHB for the Project). The data in the study has also been reviewed by the Town's peer review consultant and found to be acceptable for use in the traffic analysis, as evidenced by the peer reviewer's "clean" comment letter issued on July 7, 2022.

3. Comment: Given the proximity to our zone 1 and 2 water protection areas, why is there no condition for responsibility or accountability if disallowed chemicals, specifically those used for deicing were to enter the public water supply? I understand the applicant is going above requirements for mitigating impact by increasing stormwater catch basins and they did add filtration after peer review comments, however any contamination by these chemicals would only be the result of this project. Should the water system have to be decontaminated, shouldn't the applicant have to bear some of the costs?
 - **Response:** The Zone II DEP Wellhead Protection Area extends well beyond the limits of the Project and the Applicant cannot be held responsible for potential contamination impacts beyond their immediate control. The Applicant will be restricted in the use of deicing chemicals on the portions of site that drain to the Zone II Wellhead Protection Area located on the Project site as outlined in the proposed conditions.
4. Comment: As the Cold Spring Brook is important to its resident trout population and the stormwater catch basin mitigation is designed to return properly cooled water to this resource, what type, if any, monitoring of this brook will be done to ensure its temperature does not increase jeopardizing this important fish species. As the waiver to remove shade islands from the impervious truck parking area which is close to the Zone 1 DEP protection area was granted, won't the runoff from this parking area be warmer than if the shade islands had been installed, and would we be remiss if we did not monitor the brook to protect it for future generations?

Response: The Applicant is providing over 5 times the amount of stormwater infiltration for the Project than what would otherwise be required under MassDEP's Stormwater Management Standards. This stormwater will infiltrate into the ground and not directly into Cold Spring Brook. As such, there will be no discharge from the stormwater management systems in the small to moderate storm events, such as after thunderstorms when warmer water runs off hot pavement surfaces. This allows runoff to slowly infiltrate, which will reduce the temperatures before the groundwater potential reaches Cold Spring Brook. It

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should be noted that the Town's peer review consultant reviewed the stormwater management system to ensure compliance before the Conservation Commission, which has jurisdiction over Cold Spring Brook, issued an Order of Conditions approving the Project.

5. Comment: Monitoring wells. At the last meeting I believe it was stated that the public water supply quality monitoring wells had not yet been installed although construction on Unified Parkway had already commenced. Should not only water quality wells but also depth from aquifer or water table wells be installed and monitored to protect not only the Wilkinsonville Water Supply but also the private wells of abutters and what type of reporting to the Board on these wells would be required of the applicant? Should these be required before any additional work is done?

Response: The Applicant is required to install monitoring wells as part of its construction of Unified Parkway. The intent of these wells is to allow the Wilkinsonville Water District the opportunity to proactively monitor the groundwater quality after the approved stormwater management features are constructed and operating. The intent is to install these wells ahead of full operation to allow for baseline sampling if the Wilkinsonville Water District so chooses to do so. However, the Applicant cannot install such monitoring wells until certain project features are constructed and is actively coordinating with the Wilkinsonville Water District on the installation of these wells. In terms of monitoring private wells, the Board does not have the authority to impose conditions on the Project to require this type of monitoring when the Project is so far removed from any abutters relying on private wells, and the Project is not expected to impact the groundwater in these areas.

We look forward to seeing the Board this evening.

Very truly yours,



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