



Michael E. Scott

Direct Line: (617) 439-2811

Fax: (617) 310-9811

E-mail: mscott@nutter.com

June 8, 2022

Via Email and Hand Delivery

Sutton Planning Board
Sutton Town Hall
4 Uxbridge Road
Sutton, MA 01590

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:

On behalf of UGPG RE Sutton LLC (the “Applicant”), this letter is intended to respond to (i) written comments related to the Project received from the Town of Sutton Planning and Economic Development Director, Graves Engineering, the Wilkinsonville Water District, Ron Müller & Associates and Massachusetts Department of Environmental Protection and (ii) public comments received at the May 23, 2022 public hearing regarding the Project.

As an update to the Board, the Applicant has engaged Tree Tech, a professional arborist, to study the Sycamore tree located at the proposed Unified Parkway and Boston Road intersection. While the arborist’s written report is still pending (and will be submitted to the Board once complete), the Applicant still wanted to acknowledge to the Board that it is committed to trying to preserve the Sycamore tree at this intersection and is currently reassessing the proposed improvements to try and avoid impacts to the Sycamore tree. It is anticipated that revised roadway improvement plans will be submitted in a future submission for this Project.

We are also writing to modify the Applicant’s requested Height Special Permit to allow each of the Project’s warehouse buildings to be in excess of 35 feet in the OLI District. Although the Applicant’s original submission indicated that the height of each building will be 40 feet, the actual measured height of each warehouse building from outside grade at the loading docks to the top of the roof membrane will be approximately 45 feet.

In addition to our written responses to public comments, enclosed in this submission is the following:

- Proposed Industrial Development, Unified Parkway, Town of Sutton, Worcester County, Massachusetts, dated March 28, 2022, revised June 3, 2022 (41 sheets) prepared by Bohler Engineering (the “Updated Site Plans”);



June 8, 2022

Page 2

- Supplemental Drainage Information prepared by Bohler Engineering;
- Land Bank Exhibit prepared by Bohler Engineering;
- Truck Turn Exhibit A – Inbound prepared by Bohler Engineering;
- Truck Turn Exhibit B – Outbound prepared by Bohler Engineering;
- Common Driveway Exhibit prepared by Bohler Engineering;
- Alternate Deicing Restriction Areas Exhibit prepared by Bohler Engineering;
- Fertilizer Use Restriction Areas Exhibit prepared by Bohler Engineering;
- Overall Groundcover Exhibit prepared by Bohler Engineering;
- Interior Landscaping Exhibit prepared by Bohler Engineering;
- Monument Sign Elevation prepared by Sunshine Sign Company;
- Traffic Study Appendix Material prepared by VHB;
- Illicit Discharge Statement executed by the Applicant;
- Site Lighting – Manufacturer’s Cut Sheets; and
- Sound Study prepared by Tech Environmental (resubmitted with maps and figures showing locations of sound receptors).

Copies of this submittal have been sent to Graves Engineering via overnight delivery and to Wilkinsonville Water District via hand delivery. Additionally, the Applicant has sent a copy of this submittal by PDF to Ron Müller & Associates.

I.	<u>Memorandum to the Planning Board from Jen Hager, Planning & Economic Development Director dated April 22, 2022:</u>
	<u>General</u> – It’s very hard to tell on these plans what will exist post development for ground cover especially considering the location of the power lines and the Wilkinsonville wellhead land. Please provide a color coded over view with at least the following ground cover codes for the entirety of both of the subject lots. Untouched scrub growth low, untouched forested, paved, gravel, manicured grass, wildflower/low growth mix. Please use colors that appropriately represent the different types of ground cover. IE: low scrub growth shouldn’t be a vibrant lovely green.
	<u>Response:</u> Please refer to the enclosed Overall Groundcover Exhibit showing colors for the different types of groundcover.
	<u>IV.C -Site Plan Review</u>

June 8, 2022

Page 3

IV.C.4.d.	Shade adjacent structures so they are more apparent and label with actual land use, IE: single family home, per the regulations
	<u>Response:</u> The Applicant will provide the requested information in an exhibit as part of subsequent submission for this Project.
IV.C.4.f.	Waste disposal locations are shown, but please consider if screening is necessary at any of these locations. Please confirm that per your detail sheets all chain link fencing will be black vinyl coated and all guard rail will be timber with a metal W beam.
	<u>Response:</u> The project uses concealed compactors. Compactor locations are against the building adjacent to the loading docks, which makes screening both difficult and impracticable. Because the compactors are connected to the building and are not open, this limits the ability for wind to blow trash and debris around. The detail sheets note that all chain link fencing is to be black vinyl coated and all guard rail is to be timber with metal beam.
IV.C.4.g.	Provide lighting cut sheets that show actual lighting fixtures including color. For building mounted man-lights, show that a cover is proposed to prevent outward glare.
	<u>Response:</u> The cut sheets for each site light are enclosed with the updated Site Plans with this submission. Where possible, cut-off fixtures or outward glare shields will be installed. In some locations, wall mounted lighting is needed near the loading docks for safety reasons and glare shields are not called for. This is consistent with what has been previously approved at the existing Unified facility at 223 Worcester-Providence Turnpike.
IV.C.4.h.	Monument signage locations are shown, but with no detail. Provide at least the construction detail for the structure on which signage will be installed. If sign content is not ready yet, this can be dealt with through a condition.
	<u>Response:</u> The final monument and wayfinding signage is still being developed, however, the Applicant's sign vendor has provided an elevation view of a proposed monument sign at either end of Unified Parkway. The Applicant would be willing to accept a condition that the final sign package be presented to the Planning Board prior to installation as part of this Project.

June 8, 2022

Page 4

IV.C.4.k	Is any of the site within a flood plain? Please estimate the cubic yards of required cut and fill and show on an overall site plan with one symbol or color for cut and one for fill.
	<u>Response:</u> Flood plain lines are shown on the Site Plans. No work is proposed within the flood plain.
IV.C.4.l	Indicate all areas of the site where changes to natural landscape will occur including the size and type of vegetation where appropriate. Do not use white pines in landscaping, they have limited screening value after 15 years as they lose their understory, detract from the aesthetics, and kill the lawn around them.
	<u>Response:</u> Please refer to the enclosed Overall Groundcover Exhibit and Interior Landscape Plans. White Pines have been replaced on the plans with other tree species.
IV.C.4.n	Indicate traffic flow patterns with arrows on a plan sheet. Feel free to combine with auto turn representation to verify Sutton's largest and/or most difficult to maneuver public safety vehicle(s) can navigate the sites.
	<u>Response:</u> Please see the enclosed Truck Turn Exhibit A – Inbound and Truck Turn Exhibit B – Outbound for WB-67 tractor trailer turning movements as well as traffic flow patterns. The largest firetruck in Sutton has a smaller turning radius than a WB-67.
IV.C.4.o	Insert the information table required by this section on a plan sheet
	<u>Response:</u> The information table has been added to Sheet C-301 of the Updated Site Plans.
IV.C.4.q	Adjust parking calculations to account for the s.f. of each structure that is office space. Please at least include some EV employee parking spaces, if not truck ones as well.
	<u>Response:</u> The parking calculations have been adjusted to account for the square footage of office space for each building on Sheet C-301 of the Updated Site Plans. EV employee parking spaces have been added for both buildings and are shown on the Layout Plans.
	<u>IV.A Sign Regulations</u>

June 8, 2022

Page 5

IV.A.4.c	Show required dimension for signage, including the length of the wall on which they are mounted and the sign dimensions.
	<u>Response:</u> The final building signage is still being developed. The Applicant would be willing to accept a condition that the final sign package be presented to the Planning Board prior to installation as part of this Project.
IV.A.4.j	Indicate whether signage is to be illuminated and how.
	<u>Response:</u> The final building signage is still being developed; however, the intent is to light the building signage. The Applicant would be willing to accept a condition that the final sign package be presented to the Planning Board prior to installation as part of this Project.
IV.A.5.a	Provide details about sign materials and consider the design guidelines of this section of the bylaws.
	<u>Response:</u> The final signage is still being developed. The Applicant would be willing to accept a condition that the final sign package be presented to the Planning Board prior to installation as part of this Project.
	<u>IV.B Parking Regulations</u>
IV.B.3	Adjust parking calculations to account for the s.f. of each structure that is office space.
	<u>Response:</u> The parking calculations have been adjusted to account for the square footage of office space for each building on Sheet C-301 of the Updated Site Plans.
IV.B.5.c.2	While you have provided a calculation as to the 5% required interior lot landscaping, please show which areas and their individual s.f. you have used to comply with this regulation. Additionally, these areas are meant to provide some shading of parking areas to serve the stated goal of climate relief from broad expanses of parking/pavement. (reducing heat islands)
	<u>Response:</u> Please refer to the enclosed Interior Landscape Exhibit showing the areas and calculations for the interior landscaping. Trees have been located in these areas to provide shading to the parking areas.

June 8, 2022

Page 6

IV.B.5.c.3	As noted above providing a perpendicular island down the center of two rows of parking spots easily provides intended shading of parking on either side. If this is proposed to be eliminated, please consider the amount and placement of trees and landscaping to achieve the same purpose.
	<u>Response:</u> Perpendicular islands down the center of two rows of parking stalls are not proposed. Additional trees have been added to the Updated Site Plans to increase the shading of the parking.
	<p><u>III.A. 4. Table 1. F.6. & VII.A.2.- Special Permit – Warehouse with Distribution Use</u></p> <p>Before acting on this request, the Board must make findings with respect to the following criteria with or without conditions.</p> <ol style="list-style-type: none"> 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.
	<p><u>Response:</u> Allowing this use is consistent with the spirit of the Sutton Zoning Bylaw and in conformity with the Master Plan for the Town of Sutton. The Town has identified this area of Sutton as a prime location for the development of business and industry in order to increase the Town’s tax base and drive job creation. The Project will be adequately served by Unified Parkway in terms of frontage and utilities, and has been designed in a manner to provide safe site circulation for employees and loading and delivery vehicles servicing the buildings. Appropriate facilities will be provided to ensure proper operation of the warehouse buildings and related improvements, including utilities, drainage basins, grading, landscaped areas, lighting and other features. The Project will maintain undisturbed, natural vegetated areas separating the Project from abutting properties, essentially creating a natural buffer area in excess of applicable setback and buffer zone requirements. Taken together, the Project will not cause undue nuisance or serious hazard to vehicles or pedestrians and will be in harmony with the purpose and intent of the OLI District.</p>

June 8, 2022

Page 7

	<p><u>III.B.3. Table 3 – Footnote ** & VII.A.2. - Special Permit – Building Height in Excess of 35’</u></p> <p>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.</p> <ol style="list-style-type: none"> 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.
	<p><u>Response:</u> In addition to the reasons set forth above with respect to the Use Special Permit, we note that the Board sponsored and unanimously supported several amendments to the Bylaw passed at Spring Town Meeting in 2021 to unlock the development potential of this area of Sutton, including allowing height in excess of 35 feet. Consistent with the Board’s reasoning for amending the Bylaw’s height provisions, the additional 10 feet in height is necessary to accommodate the functional and efficient operation of the Applicant’s warehouse use within the proposed buildings using the latest technology and industry standards. Applicant has sufficiently mitigated the concerns of the additional proposed height by setting back the buildings several hundred feet from residential structures in the vicinity of the Property.</p>
	<p><u>VI – I - Special Permit Common Driveway</u></p> <p>It is difficult to see where the lots lines and common portions of the proposed driveway are located with respect to each other. The length of the common portion of the driveway and the grade are also not apparent. As the bylaws require a plan of the common driveway be recorded with the Special Permit, please provide a one sheet plan no bigger than 11” X 17” that shows this information.</p>
	<p><u>Response:</u> Please refer to the enclosed Common Driveway Exhibit. We also note that the Bylaw does not require a plan of the common driveway to be recorded with the Special Permit. Rather, such plan needs to be recorded with the easement granting rights in such common driveway prior to commencing use. Specifically, Section VI.I of the Bylaw requires the permit holder to:</p>

June 8, 2022

Page 8

	<p>record a plan for the common driveway and such instruments as are necessary to establish easements providing for use of the common driveway and a restriction burdening all lots served by the common driveway that said common driveway shall remain private in perpetuity, no parking will be allowed on the common drive and all roadway maintenance, snow-plowing and rubbish collection shall be the land owners' responsibility. <i>The plan and instruments shall be in form approved by the Planning Board, and shall be recorded, with proof of such recording provided to the Planning Board, prior to use of the common driveway to serve more than one lot.</i></p> <p>The Applicant intends to comply with this requirement and would be willing to condition the common driveway special permit on the Planning Board's review and approval of the easement instrument and associated plan prior to commencing use of the common driveway.</p>
	<p><u>V.B. - Special Permit – Groundwater Protection</u></p> <p>6. Please indicate the location of compliant oil, grease and sediment traps, such as Stormceptor units, within the drainage system.</p>
	<p><u>Response:</u> Six (6) water quality units have been added to the Updated Site Plans. Refer the Grading and Drainage Plans. They are labeled on the plans as follows: WQU-112, WQU-203, WQU-306, WQU-611, WQU-705 and WQU-706. Sizing calculations have also been provided with the Drainage Memo.</p>
	<p><u>General Bylaw 15 - Scenic Roadway Alteration</u></p> <p>The application materials do not contain the required sketches and/or mapping of proposed alterations to the scenic roadway on or within the Towns right of way.</p>
	<p><u>Response:</u> The Applicant submitted the required photos with annotations as part of its May 20, 2022 response letter submission to the Board.</p>
	<p><u>Traffic Study</u></p> <p>The directional distribution shows absolutely no projected trips from the project proceeding through the Providence Road/Boston Road intersection either north or south bound which is odd considering it will be just as easy, if not easier, to get to these buildings off Providence Road. This may be because the intersection of</p>

June 8, 2022

Page 9

	Unified Parkway and Providence Road is not included in the study. Please be sure to evaluate this intersection, including crash data, and update the directional distribution and trip projections as appropriate.
	<u>Response:</u> Please see responses to the traffic peer review comments. The intersection of Providence Road/Unified Parkway has been included in the response, along with revisions to the trip distribution assumptions for the Project.
II.	<u>Memo from Donald A. Provencher, P.E. to Wilkinsonville Water District dated April 25, 2022 (Revision #1)</u>
1.	<p><u>Zone II Groundwater Recharge</u> – A review of the 3/28/2022 stormwater report indicates that hydrologic design point DP-4 is located at the Hatchery Road well. The existing conditions modelled in this report represents the Unified Parkway roadway having been constructed. It is critical to maximize water quality and artificial recharge within all stormwater basins within the Zone II boundary of the Hatchery Road well, in order to ensure that groundwater available to the well is maximized.</p> <p>The initial HydroCAD results from the 12/16/2021 existing conditions analysis indicated 9.32 acres of tributary area to DP-4, all of which is 100% pervious, and generates 0.74 acre-feet of runoff volume at DP-4 in the 100 year storm. Using the 7.92-inch rainfall from the 100-year storm over that 9.32 acres implies that 6.18 acre-feet of rainfall is generated, and if 0.74 acre-feet runs off, then the difference of 5.44 acre-feet recharges groundwater at DP-4 in the 100-year storm under existing pre-construction conditions.</p> <p>For comparison, we obtained the artificial recharge volumes for the 100-year storm under proposed conditions from the 3/28/2022 HydroCAD analysis for those basins located within the Zone II, which include basins B2c, B3a, B2b, and basin #3. The 100-year recharge volumes, which are indicated as discarded hydrographs, are 2.81, 0.00, 1.50, and 2.38 acre-feet, respectively from each of the above basins, which totals to 6.69 acre-feet of artificial recharge within the Zone II. So, comparing the 6.69 acre-feet of proposed artificial recharge within the Zone II against the 5.44 acre-feet of natural recharge occurring prior to any construction, it appears that the Zone II will experience a net increase of 1.25 acre-feet in total groundwater recharge, in the 100-year storm, based on both stormwater reports from 12/16/2021 and 3/28/2022. This is considered a benefit to the groundwater available to the Hatchery Road well.</p>

June 8, 2022

Page 10

	<p>The 3/28/2022 report indicates that 27.74 acres of tributary area (of which 35.90% or 9.96 acres is impervious), drains to DP-4 under existing conditions (i.e. Unified Parkway constructed); and 60.84 acres (of which 35.90% or 21.84 acres is impervious), will drain to DP-4 in proposed conditions. This is an increase of twice the amount of tributary land area, and over 3.5 times the impervious area directed to DP-4. This increase in tributary land area translates into more runoff directed toward DP-4, which is available to be recharged in the stormwater basins, within and outside of the Zone II prior to reaching DP-4, as reflected above. Consequently, it appears that the prior direction provided to UGPG RE Sutton LLC to maximize artificial recharge within the Zone II has been successfully accommodated.</p>
	<p><u>Response:</u> Noted</p>
2.	<p><u>Potential for Additional Groundwater Recharge in Zone II</u> – Upon further review of the 3/28/2022 stormwater report, we identified the potential to further increase the groundwater recharge potential in the Zone II as follows, should the applicant choose to make some or all of the following modifications.</p> <p>It may be possible to expand basin B2c further towards test pit TP-SH-2-108, which would provide additional bottom surface area to increase artificial recharge. The outlet control structure (OCS) could be modified to further restrict outflow to allow more water to be stored for infiltration. A log for the above test pit was not provided in the 3/28/2022 stormwater report, therefore, it is not clear if subsurface conditions might limit this expansion potential.</p> <p>Infiltration was not modelled for basin B3a. It is not clear why infiltration was not modelled, however, any artificial recharge that does occur at basin B3a will further add to available groundwater in the Zone II. Perhaps infiltration could be modelled for basin B3a to quantify the amount of artificial recharge anticipated.</p> <p>Basin #3 includes a 100-year ponding elevation of 374.73 versus a spillway elevation of 377.00. This affords an opportunity of more than two feet of additional storage that could be achieved by modifying the OCS to further restrict outflow to allow more water to be stored for additional artificial recharge within that basin.</p> <p>Basin B2b includes a 100-year ponding elevation of 370.90 versus a spillway elevation of 372.00. This afford an opportunity of approximately one foot of additional storage that could be achieved by modifying the OCS to further restrict</p>

June 8, 2022

Page 11

	outflow to allow more water to be stored for additional artificial recharge within that basin.
	<u>Response:</u> The areas of the basins have been maximized to allow for the greatest extent of infiltration. Basin B2c cannot be expanded towards TP-SH-2-108 because the estimated seasonal high ground water elevation is higher in this location. Also for Basin #3 and Basin B2b, outlets have been modeled to control flow for all storm events. Adjusting the outlets will have impacts on the discharging flows.
3.	<p><u>Clarification on the 3/28/2022 Stormwater Report</u> – The proposed conditions HydroCAD analysis in the 3/28/2022 stormwater report indicates the modeling of two distinct stormwater basins, Basin #3 and B3a. However, plan sheet C405 indicates a 12-inch HDPE pipe with zero slope between flared end sections FES-601 and FES-602 at invert elevation 373.00, coincident with the bottom elevations of those basins. This interconnecting pipe implies that both basins are interconnected. However, this pipe does not appear to be modelled in the HydroCAD analysis. We request that the applicant clarify this apparent inconsistency, or explain our misunderstanding of the situation.</p> <p>The proposed conditions HydroCAD analysis in the 3/28/2022 stormwater report indicates the modeling of a 20-foot long x 10-foot wide broad crested weir at proposed stormwater basin B3b, presumed to represent an emergency overflow spillway. However, plan sheet C404 does not depict any such broad crested weir spillway. We request that the applicant clarify this inconsistency, or explain our misunderstanding of the situation.</p>
	<u>Response:</u> The pipe between Basin #3 and Basin B3a is only for maintenance purposes. A shut off valve has been added to the pipe and is shown on Sheet C-405. Also there is no proposed emergency spillway for Basin B3b. There is an error in the HydroCAD model. The broad crested weir for this basin should not be included.
4.	<u>Deicing Practices to be Limited Within Drainage Areas Tributary to Zone II</u> – The Long-Term Pollution Prevention Plan (LTPPP) calls for the minimization of the amount of sand and deicing chemicals to be applied on the sites; recommends deicing chemicals as a pretreatment to snow/ice storm events; recommends limiting the use of deicing materials to calcium chloride within Zone II areas and next to jurisdictional wetlands; recommends that sand and deicing chemicals should be stockpiled under covered storage facilities that prevent precipitation and adjacent runoff from coming in contact with the deicing materials; and recommends that sand

June 8, 2022

Page 12

	and deicing chemical stockpile areas shall be located outside resource areas. We recommend that the planning board condition any future approval such that no crystalized sodium chloride, crystalized calcium chloride, or other crystalized salt be allowed to be applied on any paved surfaces within drainage areas tributary to or though stormwater basins located within the Zone II of the Hatchery Road Well, and that deicing practices inside these drainage areas be limited to pre-treatment with a liquid salt brine, and / or sanding of the paved surfaces within these drainage areas. These drainage areas are specifically all paved surfaces that are included within proposed conditions HydroCAD drainage areas P4d1, P4a, P2b, P2c, P3a, P2, P3b, and P4x. We recommend that the planning board require the applicant to generate a plan entitled “Alternative Deicing Restriction Areas”, delineating a boundary over paved surfaces comprising the above drainage areas, and that that plan become a record of the site plan approval.
	<u>Response:</u> Please refer to the enclosed Alternative Deicing Restriction Areas Exhibit encompassing the requested drainage areas.
5.	<u>Restriction of Fertilizer Application.</u> We recommend that the planning board condition any future approval to ban the application of fertilizer within drainage areas tributary to or though stormwater basins located within the Zone II of the Hatchery Road Well, with the exception that that the applicant be allowed to fertilize any proposed trees and planting beds to help ensure successful growth limited to the first two years only, following their planting. These drainage areas are specifically all land surfaces that are included within proposed conditions HydroCAD drainage areas P4d1, P4a, P2b, P2c, P3a, P2, P3b, and P4x. We recommend that the planning board require the applicant to generate a plan entitled “Fertilizer Use Restriction Areas”, delineating a boundary over land surfaces comprising the above drainage areas, and that that plan become a record of the site plan approval.
	<u>Response:</u> Please refer to the enclosed Fertilizer Use Restriction Areas Exhibit encompassing the requested drainage areas.
6.	<u>Catch Basin Grate Inscriptions to Protect Water Supply</u> – We recommend that the planning board condition any future approval to require the applicant to provide catch basins with grates inscribed with the words “Do Not Dump – Drains to Waterway”, consistent with the unified Parkway subdivision approval, for all catch basins included within proposed conditions HydroCAD drainage areas P4d1, P4a, P2b, P2c, P3a, P2, P3b, and P4x. We recommend that the planning board require the

June 8, 2022

Page 13

	applicant to modify the plans to indicate a list of all catch basins requiring such inscribed grates.
	<u>Response:</u> A note has been added to the catch basins and trench drain details stating which structure grates are to be inscribed with the words “Do Not Dump – Drains to Waterway”.
7.	<u>Additional Total Suspended Solids Mitigation for Direct Zone 1 Discharge</u> – Because proposed stormwater basins B2b and B2c discharge directly at the Zone 1 boundary of the Hatchery Road well, we recommend that the planning board condition any future approval to require the applicant to provide catch basins constructed with superior total suspended solids removal equipment using techniques from proprietary catch basin vendors, such as Vortech or other equivalent manufacturers, for catch basins that are tributary to basins B2b and B2c. Specifically, these are catch basins CB-200, CB-200A, DCB-303, CB-304, and DCB-305.
	<u>Response:</u> Six (6) water quality units have been added to the Updated Site Plans. Refer the Grading and Drainage Plans. They are labeled on the plans as follows: WQU-112, WQU-203, WQU-306, WQU-611, WQU-705 and WQU-706. Sizing calculations have also been provided with the Drainage Memo.
8.	<u>Clarify Contents to be Stored Within 1,000-Gallon Holding Tank</u> – Plan sheet C-402 indicates a proposed 1,000-gallon holding tank at the back of proposed building #2, which is located within the Zone II boundary and approximately 100 feet from the Zone 1 of the Hatchery Road well. We request that the applicant clarify the contents to be stored within that holding tank, whether the holding tank will be equipped with a liquid level sensor and high water warning alarm, and to potentially relocate that tank if its contents are determined to be potentially detrimental to the Hatchery Road well water quality.
	<u>Response:</u> The holding tight tanks will contain runoff from the floor drains inside the building. Water or snow that occasionally drip off the trucks that are pulled into the facility will be piped from the floor drains to the holding tanks. A liquid level monitoring system with a highwater alarm will be added to each of the tanks. This have been noted on the Utility Plans.
9.	<u>New Gravel Access Drive to Hatchery Road Well</u> – On Grading and Drainage Plan A, sheet number C-402, dated March 28, 2021 (note: date presumably meaning March 28, 2022), the applicant proposes a 20-foot wide gravel access drive off of

June 8, 2022

Page 14

	<p>the proposed parking lot behind proposed building #2, near CB-304 to access the existing Hatchery Road well. This new access drive is intended to replace the existing access drive to the Hatchery Road well currently accessed off of Providence Road. I had discussed with Matt Piekarski in a phone call on April 5, 2022 to provide proposed grading for that access drive, as the current proposed grading reflects a 3:1 slope, which is obviously incompatible with the proposed access drive. I advised Matt that WWD requires no steeper than a 6-8 percent grade, and that grading into the zone 1 is actually allowed, since that driveway is exclusively related to the water supply, and therefore allowed by DEP. We recommend that the planning board condition the above in any future approval, if the current plans are not revised to accommodate that change before the future approval is granted</p>
	<p><u>Response:</u> The 20' wide gravel access drive is now located off of Unified Parkway between Basin #3 and Basin B3a. The maximum slope of this access drive is 7%.</p>
10.	<p><u>Country Water & Utility Corridor</u> – On Grading and Drainage Plan D, sheet number C-405, presumed date March 28, 2022, the applicant proposes a cross-country easement for a new water line connection, as well as underground power and communications utilities to the Hatchery Road well off of the proposed Unified Parkway, adjacent to proposed stormwater management area B3a. WWD requires vehicular access over the cross-country water line and utilities to accommodate future inspection, maintenance, and repairs. To that end, I advised Matt on our April 5, 2022 call that WWD will require a sand & gravel surface, or other firm stable surface to facilitate vehicular access over the cross-country main. Furthermore, I advised Matt that since a firm stable surface is required, that WWD would accept using that cross-country route as the permanent Hatchery Road well access drive in lieu of the proposed access drive off of the back parking lot of building #2 referenced above. In either option, WWD will also request a swing gate to be installed at the WWD property boundary on whichever access drive is proposed, or on both drives, if both continue to be proposed by the applicant. We recommend that the planning board condition the above in any future approval, if the current plans are not revised to accommodate that change before the future approval is granted.</p>
	<p><u>Response:</u> The 20' wide gravel access drive is now located off of Unified Parkway between Basin #3 and Basin B3a. The maximum slope of this access drive is 7%. Also a swing gate has been added to the Updated Site Plans.</p>

June 8, 2022

Page 15

11.	<p><u>Proposed Groundwater Monitoring Wells</u> – We recommend that the planning board condition any future approval to require the applicant to provide the installation of two additional monitoring wells (MWs) to facilitate the future collection of groundwater samples to determine any water quality impacts in the future. We recommend to install one MW between outfall headwall HW-301 and the bottom of the outfall at the emergency spillway at stormwater basin B2c on plan sheet C-405; and the other MW between outfall headwall HW-201 and the bottom of the outfall at the emergency spillway at stormwater basin B2b on plan sheet C-402. The purpose is to monitor any potential groundwater quality impacts from those two basins which discharge directly at the Zone 1 boundary. We recommend that the planning board condition the above in any future approval, if the current plans are not revised to accommodate that change before the future approval is granted.</p>
	<p><u>Response:</u> Two (2) monitoring wells have been added to the Updated Site Plans (specifically the Grading & Drainage Plans and the Utility Plans) in the suggested locations.</p>
12.	<p><u>Application for Special Permit for Groundwater Protection District (GPD)</u> – Section “V.B.6.c.6.” of the Sutton Zoning By-Law (Groundwater Protection District - GPD) requires any applicant who proposes more than 15% impervious area inside the GPD to precede stormwater infiltration basins with “<i>oil, grease, and sediment traps to facilitate removal of contamination.</i>” The applicant proposes deep sump hooded catch basins, scour holes, and forebays ahead of infiltration basins. I left a message with Jeff Walsh at Graves Engineering this morning for his opinion on whether Graves concurs that deep sump hooded catch basins, scour holes, and forebays are adequate to meet the by-law. We also request consideration of whether superior stormwater treatment of total suspended solids, oil, and grease removal equipment using techniques from proprietary catch basin vendors, such as Vortech or other equivalent manufacturers, as described in #7 above, should be required at every catch basin that discharges to all stormwater basins inside the Zone II area.</p> <p>We note the applicant’s attorney, Michael E. Scott, of Nutter, McClennen & Fish, LLP’s own statement, where it is essentially guaranteed, in the second paragraph on page 5 of their March 30, 2022 submission letter that:</p> <p style="padding-left: 40px;"><i>“in no way, during construction or thereafter, will the project’s drainage improvements adversely affect the existing or potential quality or quantity of water that is available in the Groundwater Protection District...”</i></p> <p>WWD request that the planning board condition in any future approval, that: (1) Graves Engineering renders their opinion on whether the proposed deep sump hooded</p>

June 8, 2022

Page 16

	<p>catch basins, scour holes, and forebays will achieve the applicant's guaranty; (2) that the applicant commit that the drinking water quality at the Hatchery Road well will be maintained in its current condition during and following project construction (as stated); and (3) that the applicant be required to guaranty future restitution, if necessary, to provide the future design, installation, operation, and maintenance of any drinking water treatment improvements at the Hatchery Road well, to correct any potential future water quality or quantity degradation at the Hatchery Road well, in the event that the applicant's above guaranty proves not to be factual. If the applicant is willing to make such a powerful "<i>in no way</i>" statement, they should be required to back it up pursuant to a permit condition imposed by the planning board.</p>
	<p><u>Response:</u> Six (6) water quality units have been added to the Updated Site Plans. Refer the Grading and Drainage Plans. They are labeled on the plans as follows: WQU-112, WQU-203, WQU-306, WQU-611, WQU-705 and WQU-706. Sizing calculations have also been provided with the Drainage Memo.</p> <p>With respect to Mr. Provencher's comment quoting our March 30, 2022 submission letter, the quoted language was itself quoting the specific Groundwater Protection District Special Permit criteria already set forth in the Bylaw and not "guaranty" of performance. Specifically, Section V.B.7.c.1 of the Bylaw requires the Board to make a finding as part of granting a Groundwater Protection District Special Permit that the proposed use must "[i]n no way, during construction or thereafter, adversely affect the existing or potential quality or quantity of water that is available in the Groundwater Protection District." Accordingly, the Applicant would be opposed to any condition imposed by the Board requiring future restitution related to drinking water improvements. The Applicant's proposed stormwater management treatment facilities as redesigned and proposed with this submission will be adequate to meet this standard, and the Applicant will need to maintain those systems as part of its Stormwater Management O&M Plan.</p>
III.	<u>Graves Engineering, Inc. Peer Review Letter dated May 13, 2022</u>
1.	<p>As inscribed on Sheet C-101 and as presented in the correspondence from Nutter McClennen & Fish LLP, the applicant is requesting six waivers from the Zoning Bylaw. GEI has no issues with the waiver requests except as noted in the following comment. GEI understands that the Planning Board will address the waiver requests.</p>
	<p><u>Response:</u> Noted</p>

June 8, 2022

Page 17

2.	For warehousing, the Zoning Bylaw requires one passenger vehicle parking space per 2,000 square feet of gross floor area (GFA), the equivalent of which is 0.5 parking spaces per 1,000 square feet GFA. The applicant is proposing passenger vehicle parking at the rate of 0.39 and 0.26 spaces per 1,000 square feet GFA for Buildings 2 and 3, respectively. GEI consulted the <i>Parking Generation Manual</i> , 5 th Edition published by the Institute of Transportation Engineers. For warehousing - Land Use Code 150, the <i>Manual</i> shows an average parking demand and 85th percentile (the point at which 85 percent of the demand falls at or below the stated value) of 0.39 and 1.11 spaces per 1,000 square feet GFA, respectively. The <i>Manual</i> also shows that the greatest parking demand occurs between 3:00 PM and 3:59 PM, presumably during a shift change. GEI recommends that if the Planning Board is considering the grant of this waiver, that the applicant first revise the plans to show land allocation (e.g., show reserve or "banked" parking spaces and associated driveways) sufficient to construct the additional parking spaces in the future to comply with the Zoning Bylaw. If the waiver is granted, the grant of the waiver should include the criteria that would obligate the applicant to construct the reserve parking spaces. (§IV(B)3. Table 4)
	<u>Response:</u> Please refer to the enclosed Land Bank Exhibit. The land bank areas for each lot are also shown on Sheet C-301 of the Updated Site Plans.
3.	The site plans need to include the addresses of abutting properties and the names and addresses of owners of parcels within 300 feet of the property line. Only the abutting property owners were identified on the Existing Conditions Plans. (§IV(C)4.c).
	<u>Response:</u> Per conversations with the Planning Director, it is the Applicant's understanding that the only direct abutters need to be listed on the plan, which they are, and that the 300-foot reference to the property line is reference to the abutter notification, not what needs to be listed on the plans.
4.	On Sheet C-301 in the Zoning Analysis, Building 2 is shown to have frontage on both Unified Parkway and Providence Road, and Building 3 is shown to have frontage on both Unified Parkway and Boston Road. Relative to compliance with the frontage requirement, the Zoning Analysis needs to be revised to account for frontage on only one street. (§I.B & §IV(C)4.d)
	<u>Response:</u> The Applicant confirms that each lot's frontage is from Unified Parkway. This is noted on the Updated Site Plans.

June 8, 2022

Page 18

5.	The site plans need to include the location, type, and screening for waste disposal containers. (§1V(C)4.0)
	<u>Response:</u> The project uses concealed compactors. Compactor locations are against the building adjacent to the loading docks, which makes screening both difficult and impracticable. Because the compactors are connected to the building and are not open, this limits the ability for wind to blow trash and debris around. The detail sheets note that all chain link fencing is to be black vinyl coated and all guard rail is to be timber with metal beam.
6.	Sheet C-304 depicts the fifteen-foot-wide road northeast of the Building 3 trailer parking as one-way. The site plans should include signs to reflect this. (§IV(C)4.h)
	<u>Response:</u> “One-Way” and Do Not Enter” signs have been added to the Layout Plans for both snow removal areas.
7.	The Zoning Bylaw requires that infiltration basins and subsurface infiltration facilities shall be preceded by oil, grease and sediment traps. Furthermore, per the MassDEP <i>Stormwater Handbook</i> Volume 1, Chapter 1, Page 12, 3 rd paragraph, light industrial activity is considered a land use with higher potential pollutant load (LUHPPL) and per Volume 1, Chapter 1, Page 14, 5 th bullet an oil/grit separator (pre-treatment BMP) followed by a sand filter, organic filter, filtering bioretention area, or equivalent (treatment BMP's) is required prior to discharge to an infiltration structure. The plans propose hooded catch basins and forebays (two pre-treatment BMP's) but no treatment BMP's prior to the stormwater being discharged to the infiltration structures. The proposed treatment trains need to be revised to include a treatment BMP for runoff generated from the pavement areas. (§V(B)6.c.6)
	<u>Response:</u> Six (6) water quality units have been added to the Updated Site Plans. Refer the Grading and Drainage Plans therein. They are labeled on the plans as follows: WQU-112, WQU-203, WQU-306, WQU-611, WQU-705 and WQU-706. Sizing calculations have also been provided with the Drainage Memo. Also four (4) bioretention areas have been added to the plans. They are shown on the plans as Bioretention Areas BA2b, BA2c, BA3a and BA3b. Sizing calculations for these areas have also been provided with the Drainage Memo.
8.	GEI has no issues with the proposed common driveway. (§VI.1)
	<u>Response:</u> Noted

June 8, 2022

Page 19

9.	<p>Sheet 6 of the off-site transportation improvement plan prepared by VHB proposes the removal of an existing 68” diameter tree at the Unified Parkway and Boston Road intersection. A previously prepared concept plan had contemplated an intersection configuration that may have allowed the tree to remain in place. GEI recommends that the Planning Board ask the applicant to explore a configuration that would allow the tree to remain. The Planning Board may also wish to ask the applicant to provide evidence (e.g., an evaluation by a qualified arborist) that the considers whether the tree can be saved and if so, what conditions need to be addressed in order to save the tree. (§15.6)</p>
	<p><u>Response:</u> The Applicant has engaged Tree Tech, a professional arborist firm, to examine the condition of the Sycamore tree located at the proposed Unified Parkway and Boston Road intersection. Their assessment will be submitted to the Board for review when ready.</p> <p>Concurrently, the Project team is evaluating alternative geometries for the intersection that would put the future edge of the roadway no closer to the existing edge of pavement. However, it is noted that such alternatives will likely involve widening and other impacts on the south side of the roadway where there is more public right-of-way. A modified geometry that balances the various needs on both sides of Boston Road will be reviewed with the Planning Department staff before revising the intersection improvement plans.</p>
10.	<p>GEI reviewed the hydrology computations and found them to be in order except as noted in the following comment.</p>
	<p><u>Response:</u> Noted</p>
11.	<p>The hydrology calculations for Pond B3a list a 15-inch outlet pipe, however Sheet C-405 depicts this outlet as a 12-inch pipe. The information needs to be consistent.</p>
	<p><u>Response:</u> Sheet C-405 has been revised to list a 15-inch outlet pipe.</p>
12.	<p>Compliance with the MassDEP Stormwater Management Standards and Handbook is reasonable except as noted in the following three comments.</p>
	<p><u>Response:</u> Noted</p>
13.	<p>Please refer to comment 7 relative to stormwater treatment.</p>

June 8, 2022

Page 20

	<u>Response:</u> See above response to Comment 7.
14.	Per the MassDEP Stormwater Handbook Volume 1, Chapter 1 Page 13, 2 nd paragraph, the long-term pollution prevention plan shall provide for the use of an emergency shut-off where appropriate to isolate the system in the event of an emergency spill or other unexpected event. Considering the project's location (partially within a Zone II) and proximity to the Zone I of a public water supply well, the project's long-term pollution prevention plan needs to be revised to include provisions for an emergency shut-off within the stormwater systems. In GEI's opinion, there are various ways to provide for a shut-off (e.g., shutoffs at the stormwater system inlets or shutoffs within the piping system).
	<u>Response:</u> Shutoff valves have been added to the outlets on the last DMHs before the WQUs.
15.	The Illicit Discharge Statement needs to be signed and dated.
	<u>Response:</u> The Illicit Discharge Statement has been signed and dated.
16.	GEI has no issues with the Rational Method pipe sizing calculations.
	<u>Response:</u> Noted
17.	On Sheets C-402 and C-405, the gravel access driveway to the Wilkinsonville Water District's well and building will be too steep; a 3H:1V grade is proposed on part of the driveway.
	<u>Response:</u> The 20' wide gravel access drive is now located off of Unified Parkway between Basin #3 and Basin B3a. The maximum slope of this access drive is 7%.
18.	The site plans need to include construction details for bollards and the proposed gates.
	<u>Response:</u> A detail for the bollards and proposed gates have been added to the Detail Sheet C-901 of the Updated Site Plans.
19.	On Sheet C-305, the northern driveway needs to include a stop sign and stop line at the intersection with Unified Parkway.
	<u>Response:</u> The stop sign and stop line have been added.

June 8, 2022

Page 21

20.	On Sheet C-406, the following drainage structures are missing out invert elevations: DMH 402, DMH 403, DMH 404, DMH 405, DMH 505A.
	<u>Response:</u> The invert elevations have been added.
21.	Sheet C-406 lists two inverts for OCS-400, one to DMH-400A and the other to DMH-402. However, the Subsurface System Outlet Control Structure Detail on Sheet C-903 depicts only one invert, to DMH-400A. The second invert needs to be included in the construction detail or deleted from Sheet C-406.
	<u>Response:</u> The table on the construction detail has been revised.
22.	The rim elevations for OCS-100 and OCS-600 as well as the outlet pipe diameter for OCS-600 need to be consistent between Sheet C-406 and the Typical Outlet Control Structure Detail on Sheet C-903.
	<u>Response:</u> Sheet C-406 has been updated.
23.	The site plans need to identify which of the accessible parking spaces are van accessible.
	<u>Response:</u> Van accessible spaces have been specified on the Layout Plans.
24.	The Seed Mix Key on Sheet C-701 needs to include the hatch type (appears to be riprap) used along the perimeter of the eastern loading spaces for Building 2.
	<u>Response:</u> The key on Sheet C-701 has been clarified accordingly.
25.	GEI did not review the water and sewer utilities and understands that they will be reviewed by the respective utility providers.
	<u>Response:</u> Noted
26.	GEI did not review the off-site transportation improvement plans in detail yet. GEI participated in an initial technical review teleconference with the applicant's team and Ron Muller & Associates on April 20, 2022. GEI understands that additional survey work associated with the existing drainage system was going to be performed and that the plans were going to be updated.
	<u>Response:</u> The Applicant is currently updating the off-site roadway improvement plans based on the initial comments received from various sources. Revised

June 8, 2022

Page 22

	roadway plans will be included in an updated submittal under a separate cover when they are ready.
IV.	<u>Ron Müller & Associates Peer Review Letter dated May 20, 2022</u>
1.	<p>The traffic study focused on the following intersections:</p> <ul style="list-style-type: none"> • Providence Road (Route 146) at Boston Road • Boston Road at Dudley Road/Pleasant Valley Road • Boston Road at Galaxy Pass • Providence Road (Route 122A) at Boston Road • Boston Road at Site Driveway <p>Please see Comment 29 regarding the inclusion of the proposed intersection of Unified Parkway and Providence Road in the study area.</p>
	<p><u>Response:</u> The proposed intersection of Providence Road at Unified Parkway has been added to the study area and, the resulting changes, including adjustments to the trip distribution, are reflected throughout the updated analysis provided in this response letter.</p>
2.	<p>The study provided a description of the area roadway network. Manual tuning movement counts were performed in October 2021 between 6:00 AM and 7:00 PM to collect the weekday AM and PM peak period volumes for the study intersections. In the Response to Comments supplement submitted on May 9, 2022, Automatic Traffic Recorder (ATR) counts collected in June 2021 along Providence Road were also submitted. Given the current traffic conditions associated with the coronavirus pandemic, the study reviewed historic traffic data to determine if the counts needed to be adjusted to represent normal, pre-COVID traffic conditions. The 2021 traffic data at the study area intersections were compared to traffic data collected in August of 2014 on Route 146 near the site. Based on this comparison, it was determined that the weekday AM peak hour counts need to be upwardly adjusted by 11 percent while the weekday PM peak hour counts were higher than the historic traffic volume data and therefore no adjustment needed to be made. RMA concurs with these COVID adjustments.</p>
	<p><u>Response:</u> Noted</p>
3.	<p>Seasonal adjustments were made to the data based on MassDOT 2019 Weekday Seasonal Adjustment Factors. It was noted that June and October traffic volumes</p>

June 8, 2022

Page 23

	along Urban Principal Arterials are approximately 7 to 9 percent higher than average annual conditions. Additionally, June and October traffic volumes along Urban Minor Arterials are approximately 6 to 14 percent higher than average annual conditions. Based on this information, the counts were not adjusted. It is recommended that the applicant review MassDOT permanent count station data near the site to confirm the lack of seasonal adjustments.
	<u>Response:</u> Data from MassDOT continuous permanent count stations 310 (Route 146 south of Purgatory Road in Sutton) and 3991 (Route 146, north of I-90 in Worcester) were reviewed to determine the seasonal factors for the year 2021, which is the year in which the traffic counts that form the basis of the traffic study were conducted. Based on the MassDOT data, June traffic volumes were equivalent to average month volumes at station 3991 and 9 percent higher than average month volumes at station 310. October traffic volumes were 11 percent higher than average month volumes at station 3991 and 7 percent higher than average month volumes at station 310. Based on the MassDOT data, seasonal factors are not needed to adjust the count data upward to average month traffic volumes. The MassDOT count station data is provided in <u>Attachment T-1</u> .
4.	Figure 3 shows the Existing adjusted traffic volumes at the study area intersections. The intersections of Boston Road with Route 146, Dudley Road and Galaxy Pass are all within 1,000 feet of each other. There are very few curb cuts between Boston Road and Galaxy Pass and therefore volumes between the three intersections should balance. It is recommended that the applicant balance the traffic volumes between the three intersections. The same comment therefore applies to the No-Build and Build volume networks.
	<u>Response:</u> Traffic volumes along Boston Road were reviewed and balanced upward where appropriate between Route 146 and Galaxy Pass. The updated Existing, No-Build, and Build traffic volume networks are provided in <u>Attachment T-2</u> .
5.	Accident data were reviewed and summarized within the traffic study. Calculated crash rates were found not to be significant at the intersections of Boston Road with Dudley Road/Pleasant Road, Galaxy Pass and Providence Road. The intersection of Boston Road at Route 146 has a crash rate much higher than the statewide and district wide averages. Furthermore, this intersection is listed as a Top 200 Crash Cluster for the years 2017 to 2019. It was not specified if a Road Safety Audit (RSA) has been conducted for this intersection. The applicant should confirm if an RSA has been conducted or is currently underway. If not, it is recommended that

June 8, 2022

Page 24

	the applicant perform an RSA at the intersection of Route 146 and Boston Road to determine any measures that may be implemented to improve safety.
	<u>Response:</u> VHB is currently in the process of initiating an RSA at this location. The RSA will be conducted in coordination with Town of Sutton staff, MassDOT, and other stakeholders. VHB anticipates that the RSA will be complete in the summer of 2022. The RSA will be completed in advance of finalizing the traffic study for the full buildout of the site, which will include all three buildings that are part of the overall master plan.
6.	A 7-year design horizon was used for the No-Build and Build condition analyses consistent with MassDOT's <i>Transportation Impact Assessment Guidelines</i> . An annual growth rate of 1.0 percent per year was used to project the future No-Build volumes. The study used a recent traffic study prepared for another project in town that went through MassDOT review to determine the annual growth rate. This traffic study was performed in 2021 for the Blackstone Logistics Center. It is recommended that the applicant provide the data that was used to develop the annual average growth rate in the Blackstone Logistics Center traffic study to confirm the use of this growth rate.
	<u>Response:</u> The annual background traffic growth rate of 1.0 percent used in the Blackstone Logistics Center study was based on a review of traffic studies for other nearby projects such as a Proposed Retail Marijuana Dispensary at Commerce Drive in Northbridge and a review of several MassDOT ATR count stations in the vicinity of the Site that contained data for multiple years the Blackstone Logistics. The ATR data shows that most count stations experienced decreases in traffic volumes over the respective review period and confirms that a 1.0 percent background growth rate is appropriate. The ATR data is provided in a table in <u>Attachment T-3</u> .
7.	The traffic study included traffic associated with the Blackstone Logistics Center at 40 and 100 Lackey Dam Road which is proposed to contain a 640,000 square foot warehouse. In addition, the study describes smaller residential developments at 19 Canal Street and 15-17 Rice Road in Millbury as well as some additional development potential at the Pleasant Valley Crossing Phase III project. These developments were assumed to be included in the annual average growth rate. While we concur that the traffic from smaller development projects can be accounted for the annual growth assumption, it is recommended that the applicant provide more information regarding the sizes of these smaller developments. Furthermore, given the proximity of the site to other towns, it is recommended that

June 8, 2022

Page 25

	the applicant reach out to local officials in Millbury and Grafton to determine if there are any planned or approved developments that would have an impact on the study area.
	<p><u>Response:</u> VHB contacted officials from the towns of Millbury, Grafton, Sutton, Uxbridge, and Douglas to obtain information about relevant projects for inclusion in the traffic study. Traffic volumes from the following background projects are included in the updated analysis provided in this response letter. The detailed information related to each project's traffic volumes are provided in <u>Attachment T-4</u>.</p> <p>Town of Millbury Projects:</p> <ul style="list-style-type: none"> • 15 – 17 Rice Road: This project consists of 26 residential duplex buildings totaling 52 units to be located at 15-17 Rice Road, approximately one mile north of the Project site. Traffic volumes expected to be generated by this project were obtained from the Traffic Impact Study¹ prepared for the project and were distributed through the study area network. • 19 Canal Street: This proposed residential development consists of 59 residential units to be located at 19 Canal Street (Route 122A) approximately two miles north of the Project site. Traffic volumes expected to be generated by this project were obtained from the Traffic Impact Study² prepared for the project and were distributed throughout the study area network. <p>Town of Grafton Projects:</p> <ul style="list-style-type: none"> • Fisherville Terrace: This project consists of 100 residential homes to be located on a 26.2 acre parcel of land off Main Street (Route 122A), approximately two miles east of the Project site. Traffic volumes expected to be generated by this project were obtained from the Traffic Impact and Access Study³ prepared for the project and were distributed throughout the study area network. • 61 Maple Avenue: This project consists of a 37-lot residential subdivision to be located at 61 Maple Avenue, approximately three miles east of the Project site. Traffic volumes expected to be generated by this project were estimated using

¹ Traffic Impact Study – 15-17 Rice Road, Millbury, Massachusetts; AK Associates; March 2021.

² Traffic Impact Study – Canal Street Residential Development, Millbury, Massachusetts; WSP; April 2021.

³ Traffic Impact and Access Study – Proposed Fisherville Terrace 40B Development, Grafton, Massachusetts; MDM Transportation Consultants, Inc.; October 2020

June 8, 2022

Page 26

	<p>data from the Institute of Transportation Engineers <i>Trip Generation Manual</i>, 11th Edition and distributed throughout the study area network.</p> <p>Town of Uxbridge Projects:</p> <ul style="list-style-type: none"> • Blackstone Logistics Center: This project consists of up to 650,000 sf of warehouse/distribution space on a 70-acre site located on Lackey Dam Road in Uxbridge, approximately 550 feet north of the Route 146 northbound on-ramp. Traffic volumes expected to be generated by this project were obtained from the Traffic Impact and Access Study⁴ prepared for the project and were distributed throughout the study area network. • Lackey Dam Road Logistics Center: This project consists of up to 220,000 sf of warehouse/distribution space on a 45-acre site located on Lackey Dam Road located in the southwesterly corner of the Lackey Dam Road/Oak Hurst Road intersection in the Towns of Sutton and Uxbridge. Traffic volumes expected to be generated by this project were obtained from the Traffic Impact and Access Study⁵ prepared for the project and were distributed throughout the study area network. • Campanelli Business Park: Phase 1 of this Project consists of 800,000 sf industrial park located along Campanelli Drive is currently in operation. Trips expected to be generated by the remaining space were estimated by using existing trip rates from traffic counts for the Phase 1 development provided in the 2020 Traffic Monitoring Report⁶ prepared for the project. The trips were distributed through the study area network based on trip distribution patterns obtained from traffic studies conducted for nearby industrial projects. • Campanelli Business Park – Amazon Facility: This project consists of an Amazon sortation facility located at 515 Douglas Street. Trips expected to be generated by this project were obtained from the Single Environmental Impact Report⁷ prepared for the project and were distributed throughout the study area network.
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

⁴ *Traffic Impact and Access Study – Blackstone Logistics Center, Sutton, Douglas, and Uxbridge, Massachusetts*; VHB; January 11, 2021.

⁵ Ibid 1.

⁶ *Traffic Monitoring Report – Campanelli Business Park (EEA No. 15830) – Uxbridge, Massachusetts*; MDM Transportation Consultants, Inc.; December 2020.

⁷ *SEIR – Transportation Component – Proposed Sortation Warehouse – Uxbridge, Massachusetts*; MDM Transportation Consultants, Inc.; October 2020.

June 8, 2022

Page 27

	<p>Town of Douglas Project:</p> <ul style="list-style-type: none"> • Gilboa Street Warehouse: This project consists of an approximately 1.1 million sf warehouse on a 65 acre site to be located off Gilboa Street. Trips expected to be generated by this project were obtained from the Transportation Impact Assessment⁸ prepared for the project and were distributed throughout the study area network.
8.	<p>It is recommended that the applicant confirm that there are no planned or approved roadway improvements within the study area.</p>
	<p><u>Response:</u> The Towns of Sutton, Grafton, and Millbury were contacted to determine if there are any roadway projects in the vicinity of the study area. The Town of Grafton is currently in the design process for a 2.05 mile long project on Main Street (Route 122A) between the Sutton Town Line and Providence Road (Route 122). The project will construct new sidewalks with handicap accessibility, new and reset granite curbing, and a new reconstructed/resurfaced roadway with bicycle accommodating shoulders. This project is currently at the 25 percent design stage. There are no other significant projects identified near the Project site.</p>
9.	<p>Based on the site plan, Building 2 is proposed to be 652,530 square feet and Building 3 is proposed to be 343,206 square feet, totaling 995,736 square feet. The trip generation of the site was based on a larger warehouse size of 1,005,000 square feet. It was noted that both buildings will not house e-commerce last-mile home delivery operations.</p> <p>The study notes that operations at other similar sites in Sutton and Lancaster were reviewed to determine the appropriate land use to use and empirical traffic data were also collected at these sites. Based on this information, the trip generation of the development was estimated using the Institute of Transportation Engineers (ITE) <i>Trip Generation Manual</i> for High-Cube Transload and Short-Term Storage Warehouse (Land Use Code 154). Although the study references the 10th Edition of the ITE manual, the trip calculations provided in the Appendix correctly use the 11th Edition of the manual.</p> <p>It was found that the ITE data resulted in higher trip generation than the empirical data collected at the similar Sutton and Lancaster sites. To provide a conservative</p>

⁸ Transportation Impact Assessment – Proposed Warehouse Building – Douglas, Massachusetts; Vanasse & Associates, Inc.; March 2022.

June 8, 2022

Page 28

	analysis, the ITE trip generation data were used and it was assumed that the peak of traffic operations for the two buildings occurs at the same time as the peak of the roadway traffic, therefore the weekday AM and PM peak hour of generator data were used to provide a conservative analysis. RMA concurs with these assumptions; however, it is recommended that the volume of truck traffic be broken out separately from the total trip generation. It is further recommended that the Applicant submit the empirical data for the two existing sites referenced to verify the trip generation assumptions.
	<u>Response:</u> Project generated truck trips were estimated using data from the <i>ITE Trip Generation Manual</i> for LUC 154. The trip generation estimates for vehicle (non-truck) and truck trips and the detailed trip generation calculations are provided in <u>Attachment T-5</u> . The data sheets that provide the basis of the empirical trip generation data are also provided in <u>Attachment T-6</u> .
10.	The traffic study describes that the trip distribution methodology was based on Journey-to-Work data obtained from the U.S. Census Bureau for persons employed in the Town of Sutton. Based on these data, the study assumes 32 percent of the new site traffic will be on Route 146 to/from the north and 31 percent of the new site traffic will be on Route 146 to/from the south. In addition, seven percent of the new trips were assigned on Boston Road to/from the west, 18 percent to/from the south/east on Providence Road and the remaining 12 percent to/from the north/west on Providence Road. The distribution of new site trips for employees appears reasonable. It is recommended that a separate distribution pattern be developed for truck traffic to and from the site as this may differ substantially from the employee distribution. The applicant should submit updated trip distribution and Build volume networks and also include the Unified Parkway and Providence Road intersection as discussed in Comment 29.
	<u>Response:</u> The original traffic study incorporated separate distributions for Project-generated truck traffic and passenger vehicles, with 100% of the trailer truck trips oriented to/from Route 146 and census based JTW data for the distribution of employee trips. The truck trip distribution patterns and truck trip assignments are provided in <u>Attachment T-7</u> . Updated build volume networks that include the intersection of Providence Road at Unified Parkway are provided in <u>Attachment T-2</u> .
11.	Capacity analyses were performed at the study area intersections under Existing, No-Build and Build conditions. The intersection of Route 146 and Boston Road currently experiences severe capacity constraints with most movements operating at level E or

June 8, 2022

Page 29

	F that will be exacerbated by additional traffic from the development. While additional capacity improvements may be difficult at this location, the Town of Sutton should consider requiring the applicant to prepare a Road Safety Audit at this intersection to determine if safety improvements can be implemented by the applicant to at least lower the accident experience, as described in Comment 5.
	<u>Response:</u> See response to Comment 5. It is expected that the permitting of Building 1 will require a more detailed impact analysis of the Route 146/Boston Road intersection, which will also include recommendations from the RSA.
12.	Existing, No-Build, and Build analyses may need to be re-run based on our prior comments regarding network balancing, traffic adjustments, and trip generation and distribution assumptions.
	<u>Response:</u> Updated traffic analyses are provided in <u>Attachment T-8</u> based on the revised traffic volumes.
13.	Given that a significant portion of the site trips will be tractor trailer trucks, the capacity analyses should also be updated to reflect an increase in the percentage of heavy vehicles on the movements affected by development truck traffic.
	<u>Response:</u> The original traffic study reflects updated heavy vehicle percentages to account for Project-generated truck traffic. The updated capacity analysis provided in this response letter also reflect revised truck percentages. The addition of the Project-generated truck traffic will have minimal impact on heavy vehicle percentages on most movements throughout the study area network during the peak hours. Specifically, the addition of the Project-generated truck traffic will result in increases of zero to 2 percent for affected movements (e.g. Boston Road westbound right turns and left turns at Route 146, Route 146 southbound left turns at Boston Road, and through movements along Boston Road at Pleasant Valley Road/Dudley Road and Boston Road at Galaxy Pass).
14.	The signalized intersection analyses were performed using the Highway Capacity Manual (HCM) 2000 methodology. It is recommended that the results be updated to reflect the newest HCM 6th methodology, or a reason be provided why this older version of the methodology was used.
	<u>Response:</u> The HCM 6 and HCM 2010 methodologies have limited capabilities related to non-standard traffic signal phasing and cannot properly analyze permitted left-turn movements from a shared left-turn/through lane, which exist at the

June 8, 2022

Page 30

	intersection of Boston Road/Galaxy Pass. Due to this limitation, the HCM 2000 methodology was used at both signalized intersections in the study area for consistency purposes.
15.	The No-Build and Build weekday AM and PM traffic volumes at the intersection of Boston Road and Providence Road in the Synchro reports do not all match the traffic volumes within the No-Build and Build traffic volume networks. It is recommended that these traffic volumes be updated to match the networks.
	<u>Response:</u> Traffic volumes for the No-Build and Build networks were updated based on the recommended adjustments. The corresponding traffic volume networks and operations analysis are provided in <u>Attachments T-2 and T-8</u> .
16.	Available sight distances from the proposed Unified Parkway intersections with Boston Road and Providence Road were not measured or compared with minimum requirements. It is recommended that the applicant measure sight distances at the proposed site driveway locations and compare the findings with the minimum requirements based on observed 85 th percentile speeds on the adjacent streets as established by the American Association of State Highway and Transportation Officials (AASHTO).
	<u>Response:</u> The Applicant is currently updating the off-site roadway improvement plans based on the initial comments received from various sources. Sight distance measurements at the intersections at both ends of Unified Parkway will be included in an updated submittal of the revised roadway improvement plans under a separate cover when they are ready.
17.	The site plan proposes to construct Unified Parkway connecting Boston Road and Providence Road and providing access to Buildings 2 and 3. Both ends of Unified Parkway will provide dedicated left and right turn lanes exiting the site. Access to both buildings is proposed via driveways intersecting Unified Parkway. It is recommended that the Unified Parkway exits onto Boston Road and Providence Road as well as the internal driveways operate under stop control with stop lines and STOP signs (R1-1) placed on the driveway exits.
	<u>Response:</u> The updated site plans prepared by Bohler Engineering show the recommended signage and pavement markings.
18.	Truck turning movements are shown for right turns into and out of the site at the Providence Road driveway, however no turning movements are shown at the

June 8, 2022

Page 31

	Boston Road driveway. It is recommended that tractor trailer truck (WB-67) turning movements also be shown at the Boston Road intersection with Unified Parkway.
	<u>Response:</u> Truck turning templates for the site driveways on Unified Parkway are included in the revised site plans prepared by Bohler Engineering. The Applicant is currently updating the off-site roadway improvement plans based on the initial comments received from various sources. Truck turning templates for the intersection of Boston Road/Unified Parkway will be included in an updated submittal of the revised roadway improvement plans under a separate cover when they are ready.
19.	The fire department's largest vehicle should be able to traverse the site. It is recommended that AutoTurn (or a similar program) be used to show a swept-path analysis of the largest fire truck to be used around the site. It is also recommended that the proponent coordinate with the Sutton Fire Department regarding accessibility to all sides of each building.
	<u>Response:</u> The largest firetruck has smaller turns than a WB-67. Please see the enclosed Truck Turn Exhibit for WB-67 trailer trucks.
20.	Truck circulation should be shown on the site plans showing how trucks will access the parking area or the loading bays. It is recommended that AutoTurn (or a similar program) be used to show tractor trailer truck (WB-67) circulation through the site. The applicant should also consider including truck wayfinding signage through the site to ensure that the trucks do not access areas designated for passenger vehicles.
	<u>Response:</u> Please see the enclosed Truck Turn Exhibits for both inbound and outbound movements. Wayfinding signage is still being developed and the Applicant will present a complete sign package to the Planning Board prior installation of the signage.
21.	The applicant should investigate the available sight lines at the Building 2 and 3 access driveways onto Unified Parkway. Of particular concern is the driveway to Build 2, where the horizontal and vertical curvature of Unified Parkway may introduce sight line constraints, both for motorists exiting the Building 2 driveway and for motorists making a left turn into the driveway. The site plan should show the sight triangles at these driveways to assure that any proposed landscaping or signs are outside these sight triangles and do not impede driver visibility.

June 8, 2022

Page 32

	<p><u>Response:</u> The Updated Site Plans show that the required sight distances, calculated based on AASHTO requirements, will be available at the two Project driveways on Unified Parkway. In fact, the plans indicate that actual available sight lines can be expected to be much longer than the required sight line calculations.</p>
22.	<p>Based on the site plan and definitive subdivision plan, a sidewalk is proposed along the westerly side of Unified Parkway with a crosswalk across Unified Parkway connecting to a sidewalk along the Building 2 driveway. The location of this crosswalk may not allow sufficient sight distance for motorists to see pedestrians in the crosswalk due to the horizontal and vertical alignment of Unified Parkway. It is recommended that sight distances to the crosswalk be evaluated and corrective actions be taken if a safe crossing at this location is not feasible. All crosswalks should have ADA compliant wheelchair ramps.</p>
	<p><u>Response:</u> The Updated Site Plans show that the required sight distances, calculated based on AASHTO requirements, will be available at the crosswalk across Unified Parkway. In fact, the plans indicate that actual available sight lines can be expected to be much longer than the required sight line calculations.</p>
23.	<p>The site plan proposes 493 parking spaces. As labeled on the site plan, per zoning requirements, 323 parking spaces are required for Building 2 and 172 parking spaces are required for Building 3 for a total of 495 parking spaces. The town should determine if the number of parking spaces proposed is adequate for the site.</p>
	<p><u>Response:</u> The Applicant is proposing a total of 252 <i>employee</i> parking spaces for Building 2 and 90 <i>employee</i> parking spaces for Building 3, whereas, for a warehouse and/or distribution use with ancillary office space, the Project would require 394 parking spaces for Building 2 and 210 parking spaces for Building 3 if it strictly complied with the Bylaw's off-street parking requirements. The Applicant is seeking a waiver of these minimum parking requirements pursuant to Section IV.B.6 of the Bylaw. The proposed parking is sufficient to meet employee and operational demands for the Project. Furthermore, by providing less than the minimum number of required parking spaces, the Project avoids creating unnecessary impervious areas, which will improve stormwater management and drainage performance.</p> <p>The parking space figures referenced above do not account for the <i>trailer</i> parking spaces provided at Buildings 2 (33) and Building 3 (118).</p>

June 8, 2022

Page 33

24.	Based on a review of the roadway improvement plans, two lanes westbound will be carried through from Unified Parkway to Galaxy Pass. Eastbound a dedicated left turn lane will be provided into Unified Parkway. The site plan shows dedicated left and right turn lanes on Unified Parkway however the roadway improvement plans do not show that. It is recommended that the site plan and roadway improvement plans coincide to show the proposed lane arrangements.
	<u>Response:</u> The Applicant is currently updating the off-site roadway improvement plans based on the initial feedback from the Board in an effort to not impact the adjacent Sycamore tree. Revised roadway plans will be included in an updated submittal under a separate cover when they are ready.
25.	The proposed stop line on Unified Parkway at its intersection with Boston Road is set far back from the road. This stop line location will result in sight line restrictions at the driveway given the grades and vegetation on either side of the driveway. It is recommended that the stop line be moved forward (no further than 10 feet from the new Boston Road curb line). The corner radii may need to be increased, or Unified Parkway widened at this intersection to allow tractor trailer trucks to safely make the turns based on this stop line location. In addition, a sight line plan and profile should be provided showing that minimum required sight lines can be attained at this location.
	<u>Response:</u> The Applicant is currently updating the off-site roadway improvement plans based on the initial feedback from the Board in an effort to not impact the adjacent Sycamore tree. Revised roadway plans will be included in an updated submittal under a separate cover when they are ready.
26.	As mentioned in Comment 18, it is recommended that truck turning movements at this intersection [Boston Road/Unified Parkway] be shown on the plans.
	<u>Response:</u> Truck turning templates for the intersection of Boston Road/Unified Parkway will be included in an updated submittal of the revised roadway improvement plans under a separate cover when they are ready.
27.	The plan proposes 12-foot wide through and left-turn lanes with 2-foot wide paved shoulders. The applicant should consider 11-foot wide through lanes and 10-foot wide left-turn lanes to allow 5-foot wide paved shoulders to be constructed that would accommodate bicycle traffic along Boston Road.
	<u>Response:</u> Given the roadway curvatures and the heavy vehicle activity associated with the development, the project design team believes that 10-foot wide turn lanes

June 8, 2022

Page 34

	would not be adequate for efficient and safe traffic operations. Reducing the through travel lanes to less than 12 feet was also determined to be less desirable, but will be investigated further. The Applicant is currently updating the off-site roadway improvement plans based on the initial feedback from the Board in an effort to not impact the adjacent Sycamore tree. Revised roadway plans will be included in an updated submittal under a separate cover when they are ready.
28.	The plans should show the proposed 5-foot wide sidewalk proposed along the westerly side of Unified Parkway and how this sidewalk will terminate at the [Boston Road/Unified Parkway] intersection.
	<u>Response:</u> Sidewalk, as well as 5-foot paved shoulders mentioned in the prior comment, contribute to added cross-sectional width, which needs to be balanced with the goal of minimizing impacts to large growth trees, stonewalls, and adjacent property access, etc. The Applicant proposes to continue reviewing the multimodal needs for the corridor with the Town Planning Department and will incorporate the features that are deemed most important to the Town within the available ROW.
29.	In response to comments received at a meeting with the applicant on April 20, 2022 VHB provided a supplemental analysis to include the intersection with Unified Parkway and Providence Road. As part of the analysis, traffic to and from the north on Providence Road were now assumed to utilize the intersection of Unified Parkway and Providence Road to access the site. As discussed previously, it is recommended that separate distribution patterns be developed for truck traffic and employee traffic. Truck routes to/from the site will likely follow a different travel pattern than employees. Furthermore, it appears that ATR data from June 2021 were used for the through volumes on Providence Road. While the projected Build volumes at the intersection are higher than the collected ATR counts, no information is provided on how these volumes were derived and what seasonal, COVID, or historical growth adjustments were made. This information should be provided to verify the future volume projections.
	<u>Response:</u> As discussed in the responses to Comments 10 and 13, separate truck trip distribution patterns were already incorporated into the original traffic study. The truck trip distribution patterns are provided in the Appendix. Adjustments to the traffic volumes along Providence Road at the proposed location of Unified Parkway are consistent with adjustments used for the other study area intersection locations. A COVID adjustment factor of 1.11 was applied to the weekday morning peak hour traffic volumes. A COVID adjustment factor was not

June 8, 2022

Page 35

	<p>applied to the weekday evening peak hour traffic volumes based on the evaluation provided in the original traffic study. Seasonal adjustment factors were also not applied to the June traffic counts on Providence Road, based on the information provided in the response to Comment 3 in this letter. An annual traffic growth rate of 1.0 percent and traffic from the background projects identified in the response to Comment 7 in this letter were incorporated into the development of the future conditions traffic volumes along Providence Road.</p>																
V.	<p><u>MassDEP Central Regional Office, Notification of Wetlands Protection Act File Number dated May 17, 2022</u></p>																
	<p>Groundwater depths reported in the Test Pit logs are observed depths, which may not correspond with mean annual high groundwater. The applicant should verify that all infiltration structures have at least 2 feet separation to mean annual high groundwater, and that the bottom elevations of all detention basins are above the elevations of mean annual high groundwater.</p>																
	<p>Responses: Based on the observations made in our site explorations the separation from ESHGW for each for the proposed stormwater basins is as follows:</p> <table border="1"> <tr> <td>Surface Basin B2a</td><td>>5.4 feet</td></tr> <tr> <td>Surface Basin B2b</td><td>12.6 feet</td></tr> <tr> <td>Surface Basin B2c</td><td>>2.2 feet or 3.5 feet</td></tr> <tr> <td>Subsurface Basin UG2d</td><td>>16.9 feet</td></tr> <tr> <td>Subsurface Basin UG2e</td><td>11.5 feet</td></tr> <tr> <td>Surface Basin B3a</td><td>3.0 feet</td></tr> <tr> <td>Surface Basin B3b</td><td>>2.2 feet</td></tr> <tr> <td>Surface Basin B3c</td><td>11.4 feet</td></tr> </table> <p>Notes on ESHGW where less than 4 feet of separation was observed:</p> <ul style="list-style-type: none"> - Within Surface Basin B2c, no redoximorphic features were observed therefore ESHGW is based on groundwater observations in well-drained soils. - Within Surface Basin B3a, no redoximorphic features were observed therefore ESHGW is based on a deep groundwater observation. - Within Surface Basin B3b, no redoximorphic features or groundwater were observed therefore ESHGW is based on a termination depths ranging from 18 to 20 feet. 	Surface Basin B2a	>5.4 feet	Surface Basin B2b	12.6 feet	Surface Basin B2c	>2.2 feet or 3.5 feet	Subsurface Basin UG2d	>16.9 feet	Subsurface Basin UG2e	11.5 feet	Surface Basin B3a	3.0 feet	Surface Basin B3b	>2.2 feet	Surface Basin B3c	11.4 feet
Surface Basin B2a	>5.4 feet																
Surface Basin B2b	12.6 feet																
Surface Basin B2c	>2.2 feet or 3.5 feet																
Subsurface Basin UG2d	>16.9 feet																
Subsurface Basin UG2e	11.5 feet																
Surface Basin B3a	3.0 feet																
Surface Basin B3b	>2.2 feet																
Surface Basin B3c	11.4 feet																

June 8, 2022

Page 36

	The lack of clear redoximorphic features indicating ESHGW and general free-draining properties of the site soils would suggest there are not large fluctuations in ESHGW at the locations of the test pit observations. Based on our observations, we exceed the MassDEP's standard of 2-feet of separation by a range of 1 to greater than 17 feet.
VI.	<u>Public Comments made during the May 23, 2022 Planning Board Hearing</u>
A.	James Marran – 80 Burbank Road
1.	The Graves report indicates that certified abutters it should be expanded to include Parcels within 300 feet of property line. Did all certified about his receive proper meeting notice?
	<u>Response:</u> The Planning Director confirmed at the public hearing that proper notice was provided to all required abutters to the Project.
2.	Will the traffic study be stamped by an engineer?
	<u>Response:</u> Sutton Zoning Bylaws require that Site plans be stamped by a Professional Engineer and all additional submittals shall be prepared by qualified professionals. The traffic study for the project has been prepared by a licensed professional engineer (PE) and a professional traffic operations engineer (PTOE). If requested by the Board, the Applicant will furnish a signed affidavit by the Engineer to this effect.
3.	Shouldn't historic Boston Road data be used to develop an accurate future road volume rate?
	<u>Response:</u> The traffic study has been prepared in accordance with applicable traffic impact study guidelines which provide guidance on data collection, future traffic growth, trip generation and various other input parameters. The study is being peer reviewed by an independent professional engineer (Ron Müller & Associates).
4.	Should additional proposed projects be added to accurately reflect future conditions?
	<u>Response:</u> Additional projects that have either been recently approved or under construction have been identified as part of the initial project comments. These are

June 8, 2022

Page 37

	being incorporated into the analysis revisions that are being prepared for review by the Board's peer review consultant.
5.	Building 1 and other future applicant projects on balance of site are not included in a future build scenario, will applicant not be applying for permits on building one or other phases of the project in the next 7 years?
	<u>Response:</u> Details regarding Building 1 that are necessary to estimate its trip generation potential are currently unknown. The scope of the project under review is therefore limited to Buildings 2 and 3. When the specifics about Building 1 are available, a new traffic study that will include the cumulative traffic from all three buildings will be prepared as part of a separate application. Whether Building 1 is constructed within the next 7 years or not has no bearing on the current project under review as the operation and functionality of Buildings 2 and 3 do not rely on any aspect of Building 1, including when/if it is constructed.
6.	Scope of impact analysis does not include Buttonwood, Old Providence, Heartness, Dodge, Hillstone, Burbank or secondary roads, is this appropriate?
	<u>Response:</u> The traffic study has been prepared in accordance with applicable traffic impact study guidelines. The scope as well as the findings of the study are being peer reviewed by an independent professional engineer, and the review comments are being addressed with additional information and clarifications as necessary.
7.	Will the Town be looking at routing agreements for the construction period to keep cars and trucks in the right places?
	<u>Response:</u> The Planning Director confirmed at the public hearing that the Planning Board would work with the Applicant to address this concern.
8.	At the last meeting It was stated by not include building one in traffic report would allow buildings 2 and 3 to be permitted without MassDOT approval and maybe be in the best interest of the developer but is this strategy in the best interest of the town?
	<u>Response:</u> Although this question was directed to the Town, the Applicant notes that Buildings 2 and 3 do not require MassDOT approval because the anticipated traffic impacts do not require the Applicant to obtain a MassDOT Access Permit. However, Buildings 2 and 3, together with Building 1, will all be reviewed by

June 8, 2022

Page 38

	MassDOT as part of the state's MEPA review process because it is anticipated that the future development of Building 1 will necessitate a MassDOT Access Permit.
B.	Andrea Mattei – 21 Golf Ridge Drive
1.	What is the legal Authority for separating a review of the three parcels, for an impact purpose?
	<u>Response:</u> The Applicant previously obtained a definitive subdivision plan approval from the Sutton Planning Board that divided the Applicant's land into several development parcels. Each development parcel designated for Buildings 1, 2 and 3 complies with zoning, so the Applicant may proceed with permitting each parcel individually. The development of each parcel requires compliance with the Sutton Zoning Bylaw's Site Plan Review requirements, which includes conducting a traffic impact assessment among other studies and assessments for the proposed development. The Applicant has submitted the required assessments for Buildings 2 and 3 with this application. When the Applicant is ready to apply for the permits and approvals necessary for the development of Building 1, the Applicant will need to conduct similar impact assessments for Building 1. Those assessments, particularly the traffic study, will need to account for impacts from Buildings 2 and 3, which will presumably be an existing permitted project by that time. In addition, the entire development will be subject to the state's MEPA review process to assess all environmental impacts given that the anticipated traffic impacts from Building 1 will necessitate the need for a state permit (i.e., a MassDOT Access Permit). The Applicant intends to start the MEPA process this July and apply for a Phase One Waiver for Building 3 due to its minimal environmental impacts, which would allow that building to proceed with development while the full-scale project undergoes MEPA review.
2.	How many employees do you anticipate having in Buildings 2 and 3?
	<u>Response:</u> Approximately 200.
3.	How many loading docks will be controlled by Unified in both of those buildings?
	<u>Response:</u> 164 loading docks, consisting of approximately 113 loading docks in Building 2 and 51 loading docks in Building 3.
C.	Christine Watkins – 65 McClellan Road

June 8, 2022

Page 39

1.	Can we change our bylaws with like a very small amount of people at a town meeting, whoever chooses to show up?
	<u>Response:</u> Although this question was directed toward the Board, the Applicant notes that the Town of Sutton follows the Town Meeting form of government, which allows changes to its zoning bylaws that are proposed and approved in compliance with the Sutton Town Charter and applicable law.
D.	Keith Downer – Chair of Sutton Historical Commission and 334 Boston Road
1.	Is there a time frame for approval of the Shade Tree Scenic Road application approval?
	<u>Response:</u> The Scenic Road application is intended to be considered concurrently with the Site Plan Approval and Special Permit applicants submitted for Buildings 2 and 3.
2.	Would ask that you look at the Sycamore tree at the intersection of Boston Road and Unified Parkway.
	<u>Response:</u> As discussed above, the Applicant is committed to trying to preserve the Sycamore tree at the Unified Parkway and Boston Road intersection and is currently reassessing the proposed improvements to try and avoid impacts to the Sycamore tree.
3.	Has anybody examined that flyover use? Restricted tractor-trailer use for the flyover? Allowed a one-lane right lane merge like they did at the rotary at 146 all the way up to Tractor Supply so there's no backup going right anymore?
	<u>Response:</u> The traffic volumes associated with Building 2 and 3 do not trigger the need for off-site traffic capacity improvements beyond those outlined for the intersection of Boston Road/Unified Parkway. Review of grade separated solutions for Route 146 are beyond the scope of the project under review.
E.	Brian Stevenson – 664 Central Turnpike
1.	Have sidewalks and or bike paths been talked about or part of the plan?
	<u>Response:</u> Sidewalks will be constructed as part of the construction of Unified Parkway. No sidewalks or bike paths have been proposed along Boston Road.

June 8, 2022

Page 40

F.	Gina Betti – 107 Dudley Road
1.	<p>I would like to talk about the trade-off for economic development in the town and having worked 20 years and the growing entrepreneurship program at Worcester Polytechnic Institute my gut instinct is that this is a good thing however the trade-off in the quality of life for residents who have invested probably the most deliver invest in their lives in their houses I think we need to take into account new noise levels new traffic patterns the landscape that will change turn the chair I do not agree that you don't need trees in an industrial park account run with a chainsaw coming at it or pavement going over the top of its roots so I'm going to be the trees voice and I'm going to ask you that you don't cut me down and I'm talking about the London planetree it's on a sycamore it's a London Plane Tree they live to be hundreds of years old they are one of the most highly regarded trees an urban setting not only for the shade that they provide for their durability and their resilience to salt and weather climate change and other uses that that we put on them their roots cause a lot of problems to sidewalks they list sidewalks they also left pavement so there are issues there but I wouldn't like to see that tree as well as the other two on Boston Road at that private residence currently enjoy those trees as long as I put over 35 years and I Every Spring I look forward to 2 them blossoming under the concerns I have at the trade-offs for our quality of life we've invested in a home or an apartment or a condo in Sutton and we have expectations of the kind of quality of life that we expect to have here is a result of our investment in in this town again there are trade-offs Reagan on a development but I think there can be some give-and-take and I know the investors in this project can afford what needs to be done to maintain our quality of life deal with traffic problems be considerate of the noise and do take care of the landscape that's all I have to say thank you.</p>
	<p><u>Response:</u> The Applicant is committed to a first-class development that will bring substantial tax revenue and job opportunities to Sutton residents while mitigating the impacts of the Project. As discussed above, the Applicant is committed to trying to preserve the Sycamore tree at the Unified Parkway and Boston Road intersection and is currently assessing alternative designs to the layout to avoid the tree.</p>
G.	Jennifer Hager, Planning Director
1.	<p>There at least 3 projects that may have an impact at the intersection of Route 146 and Boston Road that need to be looked at as part of the traffic study:</p> <ul style="list-style-type: none"> • 450,800 s.f. building warehouse building in Campanelli Business Park in Uxbridge

June 8, 2022

Page 41

	<ul style="list-style-type: none">• 518,300 s.f. building (spec building) in Campanelli Business Park in Uxbridge• 1.1 million s.f. by CRE in Douglas <p>If the projects are approved or in the approval process, then they need to be factored into the traffic analysis.</p>
	<p><u>Response:</u> Response to Comment #7 of Ron Müller & Associates' peer review letter lists the above projects, along with other planned projects in the area.</p>
2.	<p>Applicant should submit map of fixed sound monitoring locations.</p>
	<p><u>Response:</u> Please refer to the updated Sound Study submitted with this filing, which contains maps and figures of the sound monitoring and receptor locations.</p>

Very truly yours,



Michael E. Scott

MES:dal