

Barnett Ovrut, Chair
Zoning Board of Appeals
Town of Foxborough
40 South Street
Foxborough, MA 02035

April 3, 2023

Re: Walnut Street Affordable Housing Comprehensive Permit Set – Foxborough, MA
Civil/Stormwater and Traffic Peer Review

Dear Mr. Ovrut and Members of the Zoning Board:

On behalf of the Town of Foxborough, TEC, Inc. (TEC) reviewed documents as part of the engineering peer review for the proposed affordable housing development to be located at the address of Walnut Street in Foxborough, MA. The Walnut Street Joint Venture Group (the “Applicant”) submitted the following revised documents prepared by Weston & Sampson and Utile Architecture and Urban Design., which were reviewed by TEC for conformance with the Town of Foxborough Zoning Ordinance, industry standards and best management practices:

- Site Plans entitled “Walnut Street Affordable Housing Comprehensive Permit Set”, dated January 12, 2023, *revised March 24, 2023.*
- Utility and Stormwater Report for Walnut Street Senior Development, prepared by Weston & Sampson, dated January 13, 2023, *revised March 24, 2023.*
- *Proposed development of Affordable Housing Property – Foxboro, MA - Traffic Impact Assessment*; prepared by Weston & Sampson, dated January 12, 2023, *revised March 10, 2023.*
- List of Requested Waivers.
- Figure entitled “Grading & Drainage Exhibit – No. 1”, prepared by Weston & Sampson, not dated.
- Response to Comments Letter prepared by Weston & Sampson, dated March 24, 2023.

TEC has retained the original numbering from our letter dated March 2, 2023. WSE responses to original comments are shown in **bold**; TEC responses are shown in *italics*:

Site Plan Review

1. TEC has noted that the Applicant has requested a blanket waiver from any and all Town of Foxborough local By-Laws, Regulations, and approvals, however it appears the Applicant meets the majority of State Regulations and general engineering best practices.
WSE RESPONSE: WSE Acknowledged.
TEC: This comment is informational only. No further response required.

2. As the project is within 100 feet of a flagged resource area, and in some areas directly impacting the resource area, it will require a Notice of Intent filing. Additionally, TEC recommends showing the respective buffer zone(s) and impacts for the existing wetlands throughout the site.

WSE RESPONSE: WSE Acknowledged. An NOI, dated February 15, 2023 provided by Bay Colony Group, Inc., has been formally filed with the Foxborough Conservation Commission and MADEP. Jurisdictional buffer zones have been provided on the plan set.

TEC: TEC acknowledges that an NOI has been submitted to the Foxborough Conservation Commission and MADEP.

3. The Applicant calls for fifteen (15) proposed visitors parking spots in the surface parking but proposes seventeen (17) visitor parking spots within the site plans. The Applicant should be consistent with what is shown in parking counts and what is shown on the plan.

WSE RESPONSE: Sheets C102 and C103 have been revised to show the correct number of (15) proposed visitors parking spaces.

TEC: Comment addressed.

4. According to the Site Plan (Buildings Two and Three), the Applicant calls for a proposed light fixture where nothing is proposed. On the Utility Plan (Building One), the Applicant calls for a proposed transformer where nothing is proposed.

WSE RESPONSE: The callout leaders on these referenced plans have been adjusted to the correct locations.

TEC: Comment addressed.

5. The Site Plans currently show two gas lines through the parking lot. The Applicant should confirm if two gas lines are proposed or if the 2nd line was drawn in error.

WSE RESPONSE: The second gas line drawn in error has been removed from the plans.

TEC: Comment addressed.

6. The Applicant should provide turning templates showing the ability of emergency vehicles to access, circulate, and egress the site through the circulation pattern without leaving the paved surface. This includes the largest Town of Foxborough fire apparatus.

WSE RESPONSE: A fire truck turning analysis, sheet C112, has been added to the plan set demonstrating that the Town of Foxborough ladder truck (dimensions provided by the Fire Department) can navigate safely through the site as designed.

TEC: Comment addressed.

7. TEC recommends the Applicant should coordinate with the Town of Foxborough Fire Department and Highway Department for preferred locations of fire lanes (if needed), confirmation of hydrant locations, and sign requirements for fire lanes within the site.
WSE RESPONSE: The Fire Department and Highway Department reviewed our initial site design during a technical review meeting with town staff on July 20, 2022 and provided guidance on fire lanes and access throughout the site. The current proposal incorporated all comments received during that meeting.
TEC: This comment is informational only. No further response required.
8. TEC recommends adding spot grades to the Grading and Drainage Plan for each wheelchair ramp and along walkways to clarify the design satisfies both ADA regulations and the provided details.
WSE RESPONSE: Spot grades for ADA curb ramps have been provided to demonstrate ADA compliance. Slopes along walkways have been added to the grading plan to show that there shall be no walkways with longitudinal slopes exceeding 5%. All walkways will have a maximum cross slopes of 2% per the sidewalk detail provided.
TEC: TEC acknowledges that spot grades have been added to the ADA curb ramps, slopes along walkways have been identified, and the construction of accessible areas will need to conform with ADA regulations. Comment addressed.
9. The Applicant should confirm the accessible curb ramp type west of Building 3 (between AD-4 and AD-6) is applicable to the construction detail provided and meets ADA/AAB grading and slope requirements to/from the building doorway.
WSE RESPONSE: The accessible curb ramp type in this location is applicable to the construction detail provided and meets ADA/AAB grading and slope requirements to the building doorway per the spot grades provided on sheet C107.
TEC: Comment addressed.
10. The sidewalk spur on the northwest corner of Building Three is noted to “Transition to Flush.” The plans should be revised to show construction details for this spur, and/or the addition of an accessible ramp, to guarantee compliance with ADA/AAB. The Applicant should confirm construction details for all proposed accessible transition styles are provided.
WSE RESPONSE: Sheet C107 has been revised to add an ADA curb ramp to this sidewalk spur. A detail of this ramp type has been provided on sheet C504.
TEC: Comment addressed.
11. The Applicant should confirm EV charging stations and associated subsurface infrastructure doesn’t conflict with proposed utilities. The plans as shown presents the possibility of conflicts. The Applicant should provide information on required subsurface infrastructure which will be needed regardless of finalized manufacturer and/or brand chosen.
WSE RESPONSE: The final location of the EV charging stations and associated infrastructure will be detailed and coordinated as the design advances toward a Building Permit submission. Initial proposed locations are based on desired proximity to buildings and associated entrances. All potential conflicts will be vetted out prior to filing for a Building Permit.
TEC: Comment Addressed.

12. The Grading and Drainage Plan (Building One) shows potential runoff flowing to Walnut Street from the main entrance. TEC suggests revising the plans to limit runoff flowing off-site, treatment for this runoff, or an explanation on how this runoff meets requirements for de minimus flow as described in the Stormwater Handbook.
WSE RESPONSE: A de minimus discharge calculation has been provided as Attachment F.6 in the revised Stormwater and Utility Report. The flow from this portion of the site access drive is less than 1 CFS and meets the criteria to be considered a de minimus discharge.
TEC: Comment addressed.
13. According to the Drainage Schedule, AD-10 and AD-11 have a proposed rim elevation significantly higher than the surrounding landscape area. TEC recommends altering the plan to ensure that runoff flows into the designated drainage structure.
WSE RESPONSE: The rim elevations of these structures have been revised in the Drainage Schedule to reflect proper flow patterns.
TEC: Comment addressed.
14. While FE-9, FE-10, FE-11, and FE-12 are shown on the Grading and Drainage Plan with inverts, TEC recommends adding these drainage structures to the Drainage Schedule.
WSE RESPONSE: These flared end structures as noted have been added to the Drainage Schedule with their respective inverts.
TEC: TEC acknowledges that the respective structures have been added to the Drainage Schedule, with plan leaders have been removed from the Grading and Drainage Plan. This comment's intent has been addressed.
15. According to the Drainage Schedule, P-10 has a slope of 0.4%. The industry standard typically has a minimum drainage slope of 0.5%. TEC recommends revising P-10 to meet this minimum.
WSE RESPONSE: The slope of P-10 has been revised to 0.5% as requested.
TEC: TEC acknowledges that the slope of P-10 has been revised to meet industry standard. Comment addressed.
16. The Applicant should submit pipe sizing calculations to confirm adequate capacity for the proposed infrastructure.
WSE RESPONSE: Capacity calculations using Hydraflow Storm Sewers software have been provided in Attachment F.7 of the revised Stormwater and Utility Report. Resulting pipe size increases and slopes have been updated on the revised plans.
TEC: Comment addressed.
17. Within the Site Plans (Buildings Two and Three), the Applicant proposes two maintenance sheds along the southeast landscape of site. In the Materials Plan (South), the Applicant also calls for a dumpster in the same area. TEC recommends the Applicant show where the dumpster will be located in respect to the maintenance sheds.
WSE RESPONSE: A dumpster was mislabeled in this area on the Materials Plan (South). The label has been corrected to call out the two proposed maintenance sheds.
TEC: Comment addressed.

18. According to the Materials Plan (South), specs are mentioned regarding the dumpster and the trash totes. TEC recommends including these specifications within the plan set.
WSE RESPONSE: See response above. The dumpster callout was a mislabel.
TEC: Comment addressed.

19. TEC suggests proposing adequate signage regarding the “secondary emergency access only” driveway.
WSE RESPONSE: A sign indicating “Secondary Emergency Access Only” has been added to the site plan.
TEC: Comment addressed.

20. Do Not Enter (R5-1) signage is identified on the sign summary within Sheet C504 and back-to-back with the stop sign adjacent to the circular driveway on the southeast corner of Building One. TEC notes that if the 20’ secondary emergency access aisle is meant to be closed to traffic, or allowable for one-way flow based on the width, notations should be added to the plan for their locations along this aisle. All R5-1 signs should be reduced to 30”x30” per the *Manual on Uniform Traffic Control Devices (MUTCD)*.
WSE RESPONSE: The secondary emergency access off of Walnut Street has a gate that will remain closed to the general public. The final gate style will be coordinated with the Fire and Police Departments prior to a Building Permit application. The 20’-wide portion of the site access loop has proposed signage and a fire lane per the Foxborough Fire Department comments on 7/20/22. This section of driveway is intended to be suitable for 2-way traffic. The sign summary has been revised to designate all R5-1 signs as 30”x30” as requested.
TEC: Comment addressed.

21. The ‘One Way’ (R6-1) signs should be reduced to 36”x12” per MUTCD.
WSE RESPONSE: The sign summary has been revised to designate the one-way (R6-1) sign as 36”x12”.
TEC: Comment addressed.

22. The Permanent Traffic Sign Summary on Sheet C504 should be expanded to include parking-related signage.
WSE RESPONSE: Site specific signage and way-finding signage will be provided with the Building Permit application. The final locations of visitor parking, EV stations, etc. may be adjusted after a Comprehensive Permit approval.
TEC: Comment addressed.

23. The minimum height from finished grade to the bottom of traffic sign in the Accessible Sign and Post Detail (Sheet C504) should be 7-feet. This should be consistent with all other signage on-site where the sign is in or abuts sidewalk or walkway areas.
WSE RESPONSE: Per 521CMR 23.6.4: “Such signs shall be permanently located at a height of not less than five feet, nor more than eight feet to the top of the sign.” The accessible sign and post detail on sheet C504 has been updated to reflect these dimensions.
TEC: Comment addressed.

24. The Planting Plan (Sheet L130) should be revised to include sight triangles along Walnut Street to/from the site driveway to indicate areas of clearing and/or no planting to maintain sight lines based on the recommendations and values identified in the Traffic Impact Assessment (TIA).
WSE RESPONSE: The sight triangles based on the Traffic Impact Assessment have been added to Sheet L130 and the tree clearing line has been updated to maintain adequate sight lines. No plantings are proposed within the sight triangles.
TEC: Comment addressed.

Stormwater Management Review

1. *Standard 1 states that no new stormwater conveyances (e.g., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.*

The Applicant appears to be compliant with Standard 1.

WSE RESPONSE: WSE Acknowledged.

TEC: This comment is informational only. No further response required.

2. *Standard 2 requires that stormwater management systems must be designed so that post-development peak discharge rates and volumes do not exceed pre-development peak discharge rates and volume.*

The Applicant includes a Stormwater Discharge Summary Table comparing the pre and post development post discharge rates. While the pre-development rates are decreased in the post condition, the pre-development peak discharge for Analysis Point A rates contrast from what is shown in the HydroCAD report. The Applicant should revise the stormwater report to confirm that the Stormwater Discharge Summary Table and HydroCAD report are consistent.

WSE RESPONSE: WSE Acknowledged.

TEC: This comment is informational only. No further response required.

3. *Standard 3 requires that the annual recharge from the post-development site should approximate the annual recharge rate from pre-development or existing site conditions, based on soil types.*

The Applicant has provided Recharge Volume Calculations, and appears to be compliant with Standard 3.

WSE RESPONSE: WSE Acknowledged.

TEC: This comment is informational only. No further response required.

4. *Standard 4 requires that the stormwater system must be designed to remove 80% of the average annual load of Total Suspended Solids (TSS).*

The Applicant has provided treatment train TSS calculations sheets. It appears the Applicant has designed a stormwater management system that removes at least 85% of the TSS and therefore compliant with Standard 4.

While MA Stormwater Standard 4 has been met, it should be noted Section 10.3.g(2) of the Foxborough Stormwater Management Regulations was not met, as it requires 90% removal of TSS for New Developments. As noted above, the Applicant has requested a blanket waiver from all local requirements.

WSE RESPONSE: WSE Acknowledged.

TEC: This comment is informational only. No further response required.

5. *Standard 5 is related to projects with a Land Use of Higher Potential Pollutant Loads (LUHPPL).*

The proposed project is not considered a LUHPPL; therefore Standard 5 is not applicable.

WSE RESPONSE: WSE Acknowledged.

TEC: This comment is informational only. No further response required.

6. *Standard 6 is related to projects with stormwater discharging into a critical area, a Zone II or an Interim Wellhead Protection Area of a public water supply.*

The Applicant stated that the proposed project will not discharge into a critical area, Zone II, or an Interim Wellhead Protection Area of a public water supply. TEC suggests including a graphic in the report to confirm.

WSE RESPONSE: A graphic showing that the proposed site will not discharge to a critical area has been added in the Locus Map section of the revised Stormwater and Utility Report.

TEC: Comment addressed.

7. *Standard 7 is related to projects considered Redevelopment. A redevelopment project is required to meet the following Stormwater Management Standards only to the maximum extent practicable: Standard 2, Standard 3, and the pretreatment and structural best management practice requirements of Standards 4, 5, and 6. Existing stormwater discharges shall comply with Standard 1 only to the maximum extent practicable. A redevelopment project shall also comply with all other requirements of the Stormwater Management Standards and improve existing conditions.*

The proposed project is not considered a redevelopment.

WSE RESPONSE: WSE Acknowledged.

TEC: This comment is informational only. No further response required.

8. *Standard 8 requires a Construction Period Pollution Prevention Plan (CPPP) and Erosion and Sedimentation Control Plan to be implemented to prevent impacts during disturbance and construction activities.*

No CPPP or Erosion and Sediment Control Plan has been submitted to satisfy Standard 8. However, the Applicant stated that a Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan will be incorporated into the final stormwater report. TEC recommends the final stormwater report be reviewed prior to the issuance of a building permit.

WSE RESPONSE: A Construction Pollution Prevention Plan and Sediment Control Plan has been added to the revised Stormwater and Utility Report as Attachment H.

TEC: Comment addressed.

9. *Standard 9 requires an Operation and Maintenance (O&M) Plan to be provided.*

No O&M plan has been submitted to satisfy Standard 9. However, the Applicant stated that an operations and maintenance plan will be incorporated into the final stormwater report. TEC recommends the final stormwater report be reviewed prior to the issuance of a building permit.
WSE RESPONSE: An Operation and Maintenance Plan has been added to the revised Stormwater and Utility Report as Attachment I.
TEC: Comment addressed.

10. *Standard 10 Prohibits all illicit discharges to the stormwater management system.*

No Illicit Discharge Statement has been provided to satisfy Standard 10. However, the Applicant stated that an illicit discharge compliance statement will be incorporated into the final stormwater report. TEC recommends the final stormwater report be reviewed prior to the issuance of a building permit.
WSE RESPONSE: An Illicit Discharge Compliance Statement has been added to the revised Stormwater and Utility Report as Attachment J.
TEC: Comment addressed.

11. Additional Comments:

- a. According to the Drainage Schedule, it appears that the outlet control structures have elevation and specifications that are called out and not consistent with the stormwater report. The Applicant should revise accordingly.
WSE RESPONSE: The Drainage Schedule and HydroCAD reports have been revised to have outlet control structures with elevations that are consistent.
TEC: Comment addressed.
- b. It appears the sediment forebay for IB1 is undersized, with approximately 8,650 SF more impervious area flowing to it than shown in the sizing calculation.
WSE RESPONSE: The calculation sheet for sediment forebay IB-1 has been updated to reflect that adequate pre-treatment volume has been provided as designed.
TEC: Comment addressed.
- c. The Applicant may want to consider adding a drainage structure within landscaped area to the south of the site to capture offsite runoff.
WSE RESPONSE: Runoff directed to our project site from offsite properties to the south were analyzed. It was determined that the projected runoff could be captured and conveyed by the proposed structures (CB-1 and CB-2). We will perform another calculation prior to a Building Permit submission to confirm the inlet capacity of each catch basin. Double inlets will be provided if the calculated CFS to each inlet exceeds 2.0 fps for the 10-year storm event.
TEC: Comment addressed.

Traffic Impact Assessment

1. The traffic study area includes two (2) intersections in the vicinity of the site. Based upon the size, scope, and location of the development, TEC finds that the study area as provided in the TIA is sufficient to capture the effects of the project on surrounding roadways based on TIA guidelines set forth by MassDOT. This includes an evaluation of intersections in which the site generated trips increase the peak hour traffic volume by more than 5 percent and/or by more than 100 vehicles per hour per MassDOT's *TIA Guidelines* (Section 3.1.C).
WSE RESPONSE: Comment acknowledged.
TEC: This comment is informational only. No further response required.
2. The Applicant has provided traffic data collection during the weekday morning and weekday evening peak periods, as well as concurrent daily traffic counts. These June 2022 counts were conducted when schools were in regular session and subsequent to MassDOT's revised guidance on traffic volumes post-COVID. No adjustment to the counts was made to reflect seasonal fluctuation as June represents a month greater than the average-month conditions.
WSE RESPONSE: Comment acknowledged.
TEC: This comment is informational only. No further response required.
3. In the Seasonal Traffic Adjustment section, the 2019 MassDOT's weekday seasonal and axle correction factors is referenced in the Appendix as TEC's. The typographical error, however, does not affect the results reported in the TIA.
WSE RESPONSE: The typographic error has been corrected. See copy of updated Traffic Impact Assessment.
TEC: Comment Addressed.
4. The TIA notes the use of the previous "3 years" of crash data available from MassDOT's IMPACT portal; however, five-years of data has been given including the most recent four years of complete data (2017 through 2020). Note that crash rates should only be calculated using years of complete data based on recent discussions with the MassDOT Traffic Safety and Engineering Section and should also not include those years of COVID-effect (2020 or 2021). Although the overall data for these COVID years can be included and analyzed for geometric and driver deficiencies, calculated crash values such as crash rate should be revised to only include 2019 and prior years.
WSE RESPONSE: The calculated crash rates have been updated to only include 2017-2019 data. See copy of updated Traffic Impact Assessment.
TEC: Comment Addressed.
5. The TIA did not provide a date for which the sight distances dates along Walnut Street were observed and measured. The vegetation along the east and west side of Walnut Street typically grows thick and near the edge of pavement during the summer months and therefore the intersection sight distance as reported in the TIA may be less than described. TEC does not believe that this will affect the overall exceeding of the minimum requirements; however, TEC does recommend that the Applicant commit to maintaining vegetation clearing within the public right-of-way and along the project's property line to ensure minimum / desired sight lines are met beyond the opening of the project.
WSE RESPONSE: The sight distance measurements were performed on June 24, 2022 when the summer vegetation had been established. The site plans have been updated

to include the intersection sight lines and note the areas where the Applicant will commit to clearing vegetation to maintain sight lines.

TEC: Comment Addressed.

6. The TIA did not provide support materials related to the Yearly Traffic Growth of 1.8% per year as provided by TEC; however, TEC is in agreement with this rate to provided consistency with the Commercial Street / Walnut Street Improvements Functional Design Report (FDR) as completed in 2021.

WSE RESPONSE: The original TIA included a copy of an email in the Traffic Growth Section of the Appendix between Weston & Sampson, Liz Oltman of TEC, and Paige Duncan with the Town of Foxborough confirming that MassDOT had approved the use of 1.8% to be appropriate for this project.

TEC: Comment Addressed.

7. The TIA does not identify specific developments by others that may affect traffic volumes through the study area within the No-Build and Build conditions. The Applicant should provide a summary of other developments, if warranted, or identify that discussions with the Town have resulted in no developments which will result in increased traffic impacts.

WSE RESPONSE: The original TIA included a copy of an email in the Traffic Growth Section of the Appendix from Paige Duncan with the Town of Foxborough confirming the Town was not aware of any others development projects in the area.

TEC: Comment Addressed.

8. TEC reviewed the Institute of Transportation Engineers (ITE) publication, *Trip Generation, 11th Edition* for the estimated site generated traffic and confirmed the peak hour generation as noted in the TIA. The TIA utilizes the trip generation calculations for ‘Peak Hour of the Generator’ as opposed to ‘Peak Hour of the Adjacent Street’ which results in a conservative estimate for overall generation of trips and impact along the study area. TEC does not oppose the trip calculations are the trips difference are not significant and more conservative.

WSE RESPONSE: Comment acknowledged.

TEC: This comment is informational only. No further response required.

9. The trip generation calculations for the site are reported as less than described in the Commercial Street / Walnut Street Improvements FDR as the site characteristics have changed. Therefore, the impact of the site would be less than as reported in the FDR and the overall traffic signal design.

WSE RESPONSE: Comment acknowledged.

TEC: This comment is informational only. No further response required.

10. TEC reviewed the Analysis Results Table and noted a few typographical errors. These errors do not affect the results reported in the Traffic Study; However, the Applicant should correct them. Commercial Street (Route 140) at Walnut Street, 2026 No-Build for AM Peak the Queue length for Westbound Lane. Commercial Street (Route 140) at Walnut Street, 2033 Build for AM Peak the V/C ratio for the Eastbound right movement. North High Street at Walnut Street, 2033 with signal the V/C ratio for the southbound lane.

WSE RESPONSE: Weston & Sampson has reviewed the noted typographical errors and notes the following:

- We agree that the queue length for the westbound lane at the intersection of

Commercial Street (Route 140) at Walnut Street under the 2026 No-Build AM peak hour was incorrectly stated as 75ft instead of 100 ft. This has been corrected. See copy of updated Traffic Impact Assessment.

• We agree that the v/c ratio for the eastbound right turn movement at the intersection of Commercial Street (Route 140) at Walnut Street under the 2033 AM peak hour was rounded to 0.70 when the value should have been represented as 0.68. This has been corrected. See copy of updated Traffic Impact Assessment.

• We do not agree that there is a typographical error for the v/c ratio for the southbound lane at the intersection of Commercial Street (Route 140) at Walnut Street under the 2033 Build with Signal AM peak hour. The value shown in the table was 0.09 and the value in the Synchro analysis is 0.087, which when rounded to two decimal places to be consistent with the rest of the data is the 0.09 reported. Therefore, no change is required. See copy of updated Traffic Impact Assessment.

TEC: Comment Addressed. TEC misread the 0.087 on the review as 0.87 and W&S has clarified.

11. The results of the capacity analysis depicted in Table 8 and Table 9 are missing information related to projected 95th percentile queuing for unsignalized intersections and 50th/95th percentile queuing for signalized intersections. The Applicant should add this to the table.

WSE RESPONSE: The 95th percentile queue values are provided for all of the appropriate movements in Tables 8 & 9. The only values not provided are for the northbound and southbound Commercial Street (Route 140) approaches which are not under stop sign or signal control in the 2033 No-Build or 2033 Build conditions. Therefore, there is no queue value provided for the Proposed Driveway under the 2033 No-Build condition because it does not currently exist. The 50th percentile queues have been provided in addition to the 95th percentile queues in Tables 8 & 9 under the 2033 Build & Signal condition as requested.

TEC: Comment Addressed.

12. Note that the traffic volumes at the intersection of Route 140 / Walnut Street are shown significantly less than the volumes previously collected in February 2020 as included in the Functional Design Report (FDR) for the Route 140 / Walnut Street improvements. Overall, the operations shown in the FDR with the elevated trip generation projections for the site still show operations of an improved nature over existing signalized conditions.

WSE RESPONSE: Comment acknowledged.

TEC: This comment is informational only. No further response required.

13. The TIA provides no documentation of how the trip distribution percentages were evaluated. At a minimum, the Applicant should provide a listing of documents reviewed to confirm the utilization of this trip distribution. In addition, as an Affordable Housing Property development with peak hour analysis, the Applicant should seek to evaluate the trip distribution based on the most recent US Census Journey-to-Work data that is publicly available.

WSE RESPONSE: Given that the proposed use is an age-restricted (55+) community it was determined that the site distribution would not follow US Census Journey-to-Work data since a fair portion of the proposed population of the facility was anticipated to be of retirement age and no longer traveling to work. Therefore, the Trip Distribution was calculated based on existing distribution observed at the intersection of Commercial

Street (Route 140) and Walnut Street as this was believed to be a much better representation of the existing travel patterns of the adjoining neighborhood to travel to offsite employment, retail, and recreational endeavors.

TEC: Comment Addressed.

14. TEC concurs with the operational findings of the TIA that the introduction of additional traffic along Walnut Street and the surrounding street network as a result of the project will have a negligible impact on operations. The proposed traffic signal improvement at Walnut Street and Commercial Street (Route 140) will significantly improve traffic operations at the intersection.

WSE RESPONSE: Comment acknowledged.

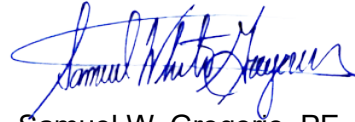
TEC: This comment is informational only. No further response required.

Please do not hesitate to contact us directly if you have any questions concerning our comments at 978-794-1792. Thank you for your consideration.

Sincerely,
TEC, Inc.
"The Engineering Corporation"



David J. Nader, PE
Project Manager - Strategic Land Planning



Samuel W. Gregorio, PE, PTOE, RSP₁
Senior Traffic Engineer