



October 7, 2020

Timothy Malley, Chairman  
Hudson Planning Board  
Town Hall  
12 School Street  
Hudson, NH 03051

Re: Hudson Logistics Center Site Plan and Wetlands Conditional Use Applications

Dear Chairman Malley & Members of the Board:

The Nashua Regional Planning Commission (NRPC) has received notification of the above referenced site plan and conditional use application that was determined by the Planning Board to be a project of regional impact pursuant to NH RSA 36:56. Given that the site abuts the Merrimack River which is a municipal border, and the overall size and scope of the proposed project, determination that the application is a project of regional impact is appropriate. NRPC has completed its review of the plan set entitled: Hudson Logistics Center Site Plan and Wetlands Conditional Use Applications (release date 9/14/20). NRPC has also reviewed the Traffic Impact Study for Hudson Logistics Center, prepared by Langan Engineering & Environmental Services with a revision date of September 2020. In addition, reference is made to a memo on Potential Peak Season Trip Generation from Langan Engineering to NHDOT dated September 22, 2020, NHDOT memos dated September 1, 2020 and September 30, 2020, a memo from Gene Porter, Chairman of the Lower Merrimack River Local Advisory Committee, dated June 4, 2020, and a letter to town officials in opposition to the project from Steven and Jennifer Varney that was copied to NRPC dated September 14, 2020. Comments were also received from representatives of other municipalities in the region at our Transportation Technical Advisory Committee meeting on September 9, 2020.

NRPC's comments are limited to issues that are regional in nature. Within the context of this application, these issues include traffic and potential impacts to the Merrimack River along with other potential economic and social impacts that may be relevant to the project.

### Traffic Impacts

In addition to a review of the revised traffic impact study, NHDOT comments, and related materials, NRPC independently reviewed trip generation estimates and ran an analysis of our TransCAD traffic model. Overall, the improvements proposed by the applicants to mitigate anticipated traffic impacts appear to be adequate to support the proposed project. With some exceptions as discussed more fully below, NRPC finds the analyses contained in the revised traffic impact study and related materials provided by the applicants to be acceptable and concurs with

the findings and conclusions of NHDOT as expressed in their memos of September 1 and September 30, 2020.

1. Study Area Intersections

Nine NH 3A (Lowell Road) intersections were identified and evaluated in the traffic study between Fox Hollow Drive and Dracut Road. As we believe that the distribution center may distribute a somewhat greater share of traffic to the north on NH 3A than reported, an extension of the study area to include the intersections of Derry/Ferry/Chase, Ferry/Library and Derry/Library Streets for evaluation would have made for a more complete traffic analysis.

2. Trip Generation

NRPC concurs with the traffic analysis that the overall trip generation volumes for Lots A and B are likely overestimated for the level of estimated employment, as peak generator traffic is applied to the peak hour of the roadway traffic. The fact that employee data was available from the tenant for these lots provides for a much more reliable traffic forecast than using the ITE manual. However, the gap between estimated 683 employees and 1,008 parking spaces results in a surplus that suggests considerable expansion may occur at some point in the future but not estimated in the current traffic analysis or significant seasonal variation. This discrepancy was also noted in NHDOT's memo dated September 1, 2020 and a request was made for an analysis of seasonal trip generation.

The seasonal trip generation analysis provided by Langan Engineering in a memo to NHDOT dated September 30, 2020 detailed the operational demands of each the proposed buildings and described anticipated holiday seasonal variation as part of the justification for the additional spaces. NRPC notes that it is not typical to design for seasonal holiday traffic and finds the analysis provided in the September 30 memo to be satisfactory.

Lot C trip generation is somewhat speculative, since the number of employees at this location is not known and traffic cannot be estimated using this variable, however, the estimates provided appear to be reasonable.

The traffic impact study's maximum approach combines lines from Tables 1 and 2 into a hybrid Table 5. A multi-occupancy vehicle credit of 5% was taken, which is a reasonable adjustment for an area without public transit or formal transportation demand management programs.

It should be noted that in the detailed trip generation spreadsheet that provides a breakout of cars and trucks, truck generation in the AM peak (highlighted yellow) is significantly lower than periods which precede it and come after. Since large trucks have a

significantly higher impact on traffic operations than passenger vehicles, this vehicle mix, if accurate, is optimal for the peak periods.

### 3. Trip Distribution

NRPC reviewed the employee trip distribution presented in Figure 6 of the traffic impact study. The consultant analysis concluded that 17% of site generated trips would continue north on NH 3A (Lowell Road) past the intersection with Sagamore Bridge Road and this was modified to 15% for calculation of Build traffic volumes.

NRPC conducted a close look at projected patterns because a greater share of northbound traffic on NH 3A would impact the congested intersections in the triangle area, where NH 3A, 111 and 102 converge. The TransCAD traffic zone layer contains total resident employees for all zones in Hudson. The TransCAD shortest path network tool was used to determine best paths to the Logistics Center site. Testing for a number of zones indicated that an estimated 13.7% of employees would use NH 3A to the north compared with the 9.2% indicated by the study.

A more general trip analysis using Google Map paths was done for other communities for which NH 3A from the north appeared to be a reasonable option for travel to the site. Based on this analysis, some additional traffic in and around downtown Nashua and several other communities is likely to travel south on Lowell Road to the development site. Our analysis indicates that about 25% rather than 15% of traffic is likely to travel on NH 3A north of Sagamore Bridge Road. While this would add traffic to several intersections which were evaluated, with the implementation of proposed roadway improvements, the Build operation conditions along studied intersections would still likely be improved over the No-Build. As noted, there would be some additional congestion within the triangle area where state routes converge.

### 4. Public Transit

In the Langan memo of September 30, it is noted that the developer had discussed the potential for bus service to the site with the Nashua Transit System (NTS). NTS currently operates bus service along the DW Highway corridor in Nashua within a short distance of the project site. We would also note that Lowell Regional Transit (LRT) operates a bus line that terminates at Ayottes Market on Lowell Road less than two miles from the project site. The potential exists, therefore, to connect the site to both NTS and LRT which could reduce potential traffic impacts while providing employment opportunities for transit depended workers in both population centers. Further, an extension of NTS service to Ayottes Market has the potential to serve multiple businesses along the Lowell Road corridor. NTS has successfully partnered with private businesses such as BAE to provide bus service utilizing private funds and is actively seeking new opportunities to work with interested businesses. We would encourage the applicant to continue to pursue alternatives for expanding NTS service to the site.

### Potential Impacts to the Merrimack River

The Merrimack River is a tremendously important resource that serves as a regional public water supply, provides wildlife habitat, and offers recreational opportunities for area residents along with other benefits. In its review, NRPC makes reference to the Lower Merrimack River Local Advisory Committee (LMRLAC) letter of June 4, 2020. We note that the revised plans have moved the proposed detention basins referenced in the LMRLAC letter out of the 250-foot shoreland protection area and that additional tree plantings have been proposed to supplement existing wooded areas along the shoreline which would remain undisturbed. Additional tree plantings between developed portions of the site and the existing natural woodland buffer will help to mitigate potential visual impacts for users of the River while enhancing overall environmental quality. We also note that an existing impervious path within the 250-foot shoreland area is to be removed. Given the limited intrusion into the shoreland area and proposed additional tree plantings within shoreland areas to be restored, potential impacts to the Merrimack River appear to be minimal.

Though adverse impacts to the River do not appear to be significant, NRPC notes that few sites in Hudson enjoy river frontage as extensive as the subject site. The proposed project, therefore, offers an opportunity to increase public access to the River significantly. We are pleased to see a boat ramp proposed as a part of the project, though we understand that its use would be limited to public safety purposes. We also note that a “potential future recreational trail” is shown on the plans. We understand that the trail was requested by the Town Planner based on public input received as part of the current Master Plan update. We recommend that a public access easement be provided to facilitate development of the proposed trail and urge the applicant to work with the Town to enhance recreational access to the River wherever possible.

### Potential Economic Impacts

Based on the fiscal impact statement and other materials submitted to the town, it is our understanding that the completed project would result in the creation of an estimated 1,400 permanent jobs that would generate over \$81,000,000 in direct wages and over 800 construction jobs. When completed, the site would become the second largest employment center in Hudson after the Sagamore Business Park, and the prime tenant would become the town’s largest private employer. The creation of 1,400 new jobs would have significant positive impact on the region’s economy, particularly at a time of relatively high unemployment, and could help to offset job losses in other industries.

### Conclusion

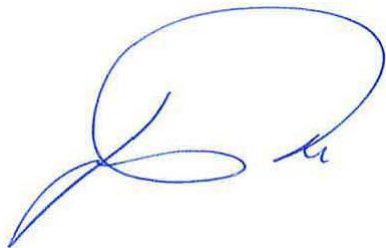
Based on our analysis of the revised Traffic Impact Study and related materials submitted by the applicant, input from NHDOT and other stakeholders, and our in-house trip distribution modeling, we conclude that the improvements proposed by the applicants to mitigate anticipated traffic impacts appear to be adequate to support the proposed project. Nevertheless, we would encourage

the applicant to pursue expansion of public transit to the site. Public transit connections to the site have the potential to reduce traffic impacts while expanding potential employment opportunities to transit dependent populations. Regarding the Merrimack River, we find that potential impacts would be minimal given that little development activity is proposed within the shoreland protection area and that restorative landscaping is proposed where necessary. Further, we note that securing public access easements for the “potential future recreational trail” and working with the town to enhance on or off-site recreational access to the River would be of significant benefit to the public. Finally, we note that the potential economic impact of the project would be of substantial benefit to the region’s economy.

NRPC appreciates the challenges in reviewing a project of the size and scope of the proposed Hudson Logistics Center. We welcome the opportunity to provide input and would be happy to provide any additional information or assistance as may be required by the Board. Thank you for your consideration.

Sincerely,

**NASHUA REGIONAL PLANNING COMMISSION**

A handwritten signature in blue ink, appearing to read "Jay Minkarah", with a large, stylized loop at the end.

Jay Minkarah  
Executive Director

cc: Brian Groth