



December 16, 2020

Timothy Malley, Chair  
Hudson Planning Board  
12 School Street  
Hudson, NH 03051

Mr. Chair and Members of the Planning Board:

I have been asked to respond to comments received by the Planning Board from the public concerning the fiscal impact of the proposed Hudson Logistics Center. The following is a list of public comments, along with my responses below each question.

- (1) Comment: Will it drain on police resources?

***Response:*** *The fiscal impact study assumes additional expenditures by the police department and has accounted for those costs in the cost and revenue analysis.*

- (2) Comment: Green Meadow will be a town road and the town will have to plow it and maintain it.

***Response:*** *The fiscal impact study assumes modest additional expenditures by the Public Works Department for road maintenance, and this was accounted in the cost and revenue analysis. However, since the project no longer contemplates a subdivision and no longer contemplates dedicating Greenmeadow Drive as a public way, there will be no roadway maintenance responsibilities for the Town.*

- (3) Comment: Town Services. Who will maintain Greenmeadow Drive? Costs to Town.

***Response:*** *The condominium association to be formed for the HLC will have the obligation to maintain Greenmeadow Drive. Therefore, the Town will be assuming no costs for the maintenance of Greenmeadow Drive.*

- (4) Comment: Have any tax breaks been offered by the Town of State?

***Response:*** *We are not aware of any tax breaks offered by the Town or State of New Hampshire.*

- (5) Comment: Suellen Seabury -- 50 Pelham Street. All of us have a vested interest. Was on the PB and reviewed 3-4 plans for this site. Casino – crime and a drain on service. One

included 300-400 houses – and a new school. Shopping Mall – good and bad thing – we were going to have to take a few homes. I appreciated the concerns of the neighborhood over the years. When I see what this developer has done – of all the plans I’ve seen for this site – this has to have the least negative impacts.

***Response:*** *The proposed project will place few demands on Town services, and the cost of the services it does require will be more than offset by development-generated tax revenue.*

- (6) Comment: Why is any portion of this development’s roadways being proposed to be public streets?

***Response:*** *The original proposal assumed a subdivision with an access road that would eventually become a public way. That plan has changed. The project no longer involves a subdivision, and the access road will be private. See responses to Comment Nos. 2 and 3 above.*

- (7) Comment: Will the extension of Steele Road be made into a public roadway?

***Response:*** *We understand the Applicant’s plan is to extend an easement from Steele Road to the westerly limits of the property for public safety purposes as depicted on the site plans. The terms of any easement remain to be discussed with the Town.*

- (8) Comment: How much of the newly created revenue from these centers will go into annual roadway maintenance and extra town services? For companies such as these, the town will need to be prepared and have the equipment to deal with large hazardous waste spills, potential traffic issue, especially in the winter, with tractor trailer, warehouse injuries and even warehouse fires. Do we currently have the ability to deal with a large diesel spill along with any warehouse issues? I understand that we already have a large industrial development in town but no buildings of this magnitude. Will we actually see revenue for school projects and general town up-keep or will it go back into maintaining the area around and related to the new companies?

***Response:*** *The fiscal impact study focuses on estimating property tax revenue, so all of the revenue reported in our analysis will be General Fund revenue to support municipal and school services. How the funds are actually expended will depend on local decision-making.*

- (9) Comment: Will the town of Hudson need to hire more fire and police personnel as a result of this development?

***Response:*** *The fiscal impact study assumes additional expenditures by the police and fire departments, and those costs are accounted for in the cost and revenue analysis.*

- (10) Comment: Will the fire department need another ladder truck because of the size of these buildings?

**Response:** *When we interviewed the fire chief on May 11, 2020, he did not identify the need for another ladder truck. If he believes one will be needed, the proposed development will provide more than enough revenue to support capital investment in additional fire apparatus.*

- (11) Comment: Will the town need more emergency vehicles as a result? (police cars, ambulances, fire trucks of any kind?)

**Response:** *The fiscal impact analysis assumes additional expenditures by the police department and has accounted for those costs in the cost and revenue analysis. We have not included capital costs such as a fire truck because during our interviews with Town staff, we were not informed that one would be needed. If one is needed, the proposed development will provide more than enough revenue to support capital investment in emergency vehicles.*

- (12) Comment: We are contacting you regarding the proposed Logistics Center in Hudson and urge you to negotiate with the Hillwood Team to include funds for the improvement of the Hudson Police Department - adding employees and building updates.

**Response:** *The fiscal impact analysis assumes additional expenditures by the police department and has accounted for those costs in the cost and revenue analysis. When we interviewed the police chief in May 2020, he informed us of the need for a new police station. We have not included debt service for it because through our conversations with the chief, we understand that the facility is an existing need in Hudson, not a need caused by or directly attributable to the Hudson Logistics Center. As previously noted, however, the proposed development will provide ample revenue to assist with the cost of constructing a new police facility if the Town determines a new police station is required.*

- (13) Comment: After communicating with Chief William Avery, he confirmed that this project will bring added calls for services by the Hudson Police Department, such as: directing traffic flow, alarm calls, dealing with employee theft, traffic accidents, traffic violations, etc., all requiring additional calls for service by the Hudson Police Department. If passed, there will be large construction companies and 2500 additional employees at that site, open 24/7, Additional police officers will be necessary and the current Police facility will need to be enlarged to support our Police officers and Administration so they are able to continue to provide the best support and vital services to the Town of Hudson. With the addition of the proposed 3 large buildings, construction crews and 2500 additional employees at the Hudson Logistics Center, there will be an increase in traffic and the need for additional police services. Our Police facility needs to have the resources to support this additional growth in the Town of Hudson. Thank you for your consideration in this important matter to negotiate with the Hillwood Team to include these needed improvements for the Hudson Police Department.

**Response:** *Please refer to previous responses to comments above.*

- (14) Comment: This will cost all of Hudson residents money, not just the residents who live around Walmart and the highway. Proponents will say that this will help Hudson

taxpayers, but we need to consider the impact this change to our town will have on us, financially. These trucks, using 200+ loading docks every single day, twenty four hours a day, seven days a week will have an impact on our roads that we, Hudson residents, will need to pay for in our taxes. Everyone in Hudson will need to pay for this, not just those of us who live in the southern part of Hudson. And this will be forever.

**Response:** *The net revenue of \$4,620,600 (assuming the higher service cost estimate presented in our September 1, 2020 letter to the Planning Board) is more than adequate to support the cost of road maintenance on streets for which the Town of Hudson is responsible.*

(15) Comment: Town Services.

- Road maintenance and resurfacing given a constant traffic of 18 wheelers and box delivery trucks. / There is a significant recurring cost which will be on going each year and needs funding provided annually by Hillwood and their tenants.
- Added police in the southern section of town to address issues brought about by traffic, truckers, safety etc. / This is an added recurring cost which needed to be funded annually by Hillwood and their tenant.
- Insure Hillwood or their tenants have a reserve fund for costs to Hudson should an unforeseeable event occur over time. Costs need to be burdened by the Hillwood business or tenants and Hudson be assured we have a means to get funds quickly.

**Response:** *Please refer to previous responses to comments above.*

(16) Comment: What tax exemptions are being sought? Please be specific. Also, why would any tax exemptions be warranted or needed if they have \$M to spend? What bonds will they post and for how long to ensure that all work is completed and if they cause damages in the future? Other developers have had to post bonds, why not them? Are neighboring towns such as Windham being notified about the proposal to dump trucks onto route 111 In order to connect to I93 and which will then travel on this 2 lane road past their town centers and two schools? Will this development cover the incremental costs of fire and police?

**Response:** *We are not aware of any tax exemptions offered by the Town or State of New Hampshire. Hillwood will likely be required to post bonds as required by Planning Board regulations or the regulations of other authorities, as applicable. As previously stated, the fiscal impact analysis addresses incremental costs.*

(17) Comment: The negative impact and cost to repair and maintain these roads and areas being used by this over load of traffic usage.

**Response:** *The net revenue of \$4,620,600 (assuming the higher service cost estimate presented in our September 1, 2020 letter to the Planning Board) is more than adequate to support the cost of road maintenance on streets for which the Town of Hudson is responsible.*

- (18) Comment: The negative impact on the already overly stressed existing Fire and Police personnel and equipment. /The negative impact on our air quality, wetlands, and water and sewerage capacity, and the existing wild life (*sic*) population. / The negative impact on computer and phone services capacity.

*Response:* The fiscal impact analysis assumes additional expenditures by the police department and fire department has accounted for those costs in the cost and revenue analysis. The proposed development complies with federal, state, and local environmental laws, ordinances, and regulations.

- (19) Comment: Impact on public funds for services. Note: Commenter makes a number of statements. We have attempted to summarize them here. § 289-36 Review of subdivision effect on services. [links to town code]. June 5th Distribution Center Fire: [link provided details fire in Redlands CA facility)] “Within 15 minutes the whole back of the building collapsed and exploded,” ... “That is highly concerning, we’re looking at a modern building with the latest advances installed inside the building regarding fire protection systems.”

The proposed distribution centers may necessitate an excessive expenditure of public funds for Water supply, Drainage, Transportation, Fire Services. There are concerns that additional expenditures may contribute to additional financial burden to residents of Hudson NH and surrounding towns. Has a detailed estimate been provided regarding expected expenditures and impacts to town services?

*Response:* The fiscal impact analysis assumes additional municipal services costs and has accounted for those costs in the cost and revenue analysis. Please refer to our June 2020 fiscal impact analysis and September 1, 2020 letter to the Planning Board.

- (20) Comment: My concerns regarding fiscal impact is what happens if due to our due diligence Hillwood loses its potential client for building A&B. They already have a building proposed without a tenant(s). How will this impact the town of Hudson if the buildings are put up with no tenants to fill them? If the property is left vacant will Hillwood provide security for the property or expect the town of Hudson to take on the cost of monitoring the property?

The fiscal impact study includes estimated jobs per building. Without a tenant for building C how were those numbers generated? Also, with tenants for A & B being contingent how will these numbers be affected if a different tenant takes these buildings?

*Response:* Employment estimates for Buildings A and B are based on the number of jobs in comparable facilities operated by Amazon, and estimates for Building C are projected based upon the intended use of Building C.

- (21) Comment: Tax Credits, Abatements or Incentives associated with project - please ask and make it public record so no future conspiracy scenario theories can cloud these issues. The Fiscal Impact is just a segment of the exponentially larger cost to our Town if the

Hudson Logistics Center is approved and built. However, the Planning Board's next meeting is limited to Fiscal Impact and Property Values. Since there is severe time restraints on the Planning Board and public to explore those issues in one meeting please also consider asking or exploring some of the following with Hillwood during any public hearing. TAX CREDITS, ABATEMENTS or INCENTIVES please ask for public record about hidden monetary costs. Will Hillwood get any Town, County, State or Federal TAX CREDITS such as job creation tax credit, etc. for this project? - Will Hillwood get any Town, County, State or Federal ABATEMENTS such as property tax, inventory tax, and local tax rebate for hiring local, etc. -Will Hillwood get any Town, County, State or Federal INCENTIVES such as utility extensions to site, grants for funding utilities, reduced sewer and water usage charges, etc.?

**Response:** *We are not aware of any tax breaks offered by the Town or State of New Hampshire.*

- (22) Comment: Fiscal Impact: Basic Flaws in methodology to reach conclusions: *Note: Commenter makes a number of statements. We have attempted to summarize them here.* No mention of reduction of annual revenue with possible land transfer for Conservation protection. Density of 3 Lot HLC subdivision development building floor space 2,602,000 sq. ft. is not on 367.4 acres of upland area but includes a vast amount of unbuildable wetlands, wetland buffers and 250 ft. Shoreland Protect buffer that the Fiscal Impact Analysis ignores. This inflates the current and future total land assement (*sic*) value. What happens when approximately 80 acres are transferred to the Town for Conservation Land as part of Mitigation /Compensation per 334-36 (C) (4). Property Tax revenue will be lowered appreciably for any Lots affected. . . . No new additional ROW maintenance cost are incurred by Towns in examples given, only maintenance of existing roadway. . . .

Estimating new service costs are subjective. Town will incur new additional collector street level of service right of way to maintain not a minor 3 lot subdivision road where hopefully everyone can sleep at night. The Hudson Logistics Center will operate and have traffic 24/7 365 days a year. No new additional ROW maintenance cost are incurred by Towns in examples given, only maintenance of existing roadway. . . . No allowances for hidden costs for additional Police, Fire and DPW services that will be required. . . . Additional Fire apparatus, fire hydrant maintenance (snow removal, periodic flushing and flow test costs, where are they?

**Response:** *The fiscal impact analysis focuses on revenue to be generated by the Hudson Logistics Center and the associated cost of municipal services, including but not limited to police, fire, public works, and town administration/assessor. The purpose of the analysis is to address the question: can this development pay for itself? The answer is yes.*

- (23) Comment: Regarding estimated costs of community services (fire, police etc). The developer, in Table #1 of their analysis, estimates that the town currently spends ~\$3M per year in expenditures for non-residential property. The developer, also in Table #1 calculates that the project will represent 58% of total non-residential property values once completed, more than doubling the current base. There is a Refinement Coefficient of

13.86% applied to calculate a cost of -240K per year to the town. While there may be some consolidation of costs due to the consolidation of square footage into a comparatively small area (if you think 3M sq-ft of space is small), where did this “co-efficient” come from? It is an easy way to fudge the figures. Is this being transparent? I don’t think so. If, for example, a new ladder truck is necessary due to the building height, might this “co-efficient” be higher? Might it even be parity? I don’t know specific costs of a ladder truck, but I am sure close to \$750K-\$1 M and you might need a crew to operate it.

***Response:*** *The coefficients used in the revenue and expenditures analysis are based on economics theory and applied economics at the Center for Urban Policy Research at Rutgers University, and is a generally accepted methodology for quantifying fiscal impacts.*

- (24) Comment: During the September 9th, 2020 Planning Board Meeting we all received the preliminary results of the Fiscal Impact of the above project to the Town of Hudson. It was preliminary as there was no input received or presented indirectly from the Fire Department, Inspectional Services, Police Department, Highway Department, Water Department and Sewer Department. This input from our town departments is but one of the critical pieces of this massive project. Is there a reschedule date for the Fiscal presentation that would include input from the above departments?

***Response:*** *The process of developing the fiscal impact analysis included interviews with Town staff, including the police, fire, public works, and assessing departments, the town administrator and finance director, and the town planner.*

We hope the above responses are helpful to the Planning Board in its consideration of the Hudson Logistics Center proposal.

Thank you,

BARRETT PLANNING GROUP LLC



Judith A. Barrett  
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