

---

888 Boylston Street, Suite 510 Boston, MA 02199 T: 617.824.9100 F: 617.824.9101

---

**To:** Brian Groth/Town of Hudson

**From:** John D. Plante

**Info:** Elvis Dhima/Town Engineer  
John Grace/Hillwood  
John Smolak/S&V  
Nathan Kirschner/Langan

**Date:** November 4, 2020

**Re:** **Response to Supplemental Public Comments -- Traffic  
Hudson Logistics Center  
Hudson, New Hampshire  
Langan Project No.: 151010101**

---

On behalf of Hillwood Enterprises, L.P. ("Hillwood"), the following are the Applicant's responses to the supplemental public comment letters as related to traffic matters concerning the proposed Hudson Logistics Center ("HLC") received by the Planning Board with Planning Board Staff Report #6 dated October 21, 2020, between September 3, 2020 and October 14, 2020. Accordingly, below please find each numbered comment followed by our response which follows under each question as **Response**.

1. For almost 50 years we have lived on Stoney Lane, a residential street in the northeast corner of Hudson. At one time it was an area where you could hear birds sing in the morning and dogs bark in the evening. Probably you live on a street like ours too. It's not unusual to see folks strolling on this wide street in the evening. You'll also see joggers, walkers, kids riding their bicycles and families pushing baby carriages or walking their dogs. It's a wide rural street without sidewalks. When the GPS came into use, drivers were directed to use our street as a convenient bypass for Rt 102 and Rt 111. Since then, gravel trucks, delivery vans, and even 18-wheelers fly down our street. None of these vehicles adhere to the speed limit sign of 25 mph - *none*.

If the Logistics Center plan passes, it will increase commercial traffic through our local streets. Trucks from this Center heading for Londonderry and Salem, points south be taking local roads and add wear and tear on their streets too. A BAN on all nonresidential local thru traffic for the health and safety of Hudson citizens and the wear/tear on our local roads will be necessary. We are strongly advising that you veto the proposed Logistics Center plan. The increase of traffic, additional wear/tear on our roads, noise and the loss of our rural character cannot balance whatever Hudson and surrounding areas will gain, if anything, from this project.

# MEMO

***Response: A detailed description of the truck and automobile distribution patterns is provided in the traffic impact study, as amended through September, 2020 (TIS), which indicates that the truck routing will be limited to Lowell Road between the proposed site driveways and Sagamore Bridge Road, to provide access to and from the FE Everett Turnpike. There is no efficiency advantage for the trucks to travel on local roads. The trip distribution follows industry standard methodologies and the site specific uses. This methodology has been reviewed and approved by NHDOT.***

2. The employee counts for the financial impact don't correspond with the employment counts for the traffic study. For the traffic study we have been given a figure of 1029, for the financial study 1400. While the traffic study does make some assumptions based on the size of the building, what number is it? Certainly it plays nicely to downplay the traffic figures while up-selling the employment estimates. Is this being transparent? I don't think so.

***Response: The anticipated number of jobs created is not a direct correlation to daily employee counts. There are a number of factors related to those numbers, including truck driver jobs that are not included in the anticipated employee counts provided. The trip generation for HLC is based on facility size and use, not employee counts. The building areas are identified in the traffic impact report and match those of the buildings on the site plans. The trip generation has been reviewed and approved by the NHDOT.***

3. In August, I wrote because I found a document titled NH DOT Statewide Freight Plan, Final Report 2019. I read it thoroughly and shared my observations with all of you. I also attended the NRPC virtual meeting on Wednesday, September 9 (a mere five days ago!). Brian Groth was on the call to represent Hudson. The NRPC acknowledged that there are areas in Hudson which are already on the list of what is considered 'High Priority' for the entire State of New Hampshire. The Nashua Regional Planning Commission did not have their traffic study complete and they stated it would probably be three weeks before their results were conclusive. An estimated date was given as the first week in October.

So it was with extreme surprise and frustration the next day that I read Governor Sununu's letter dated September 10 to the town. He incorrectly stated that the Hillwood project had already secured the necessary approvals to go forward. There is no evidence at all "the State has demonstrated that the Hudson Logistics Center proponent can mitigate for their impacts in the vicinity of the project." The Governor, I believe must have just read the massive Langan traffic impact report; and concluded that it was both factual and that it met the NHDOT's requirements.

# MEMO

Hudson Logistics Center  
Hudson, New Hampshire  
Langan Project No.: 151010101  
November 4, 2020- Page 3 of 7

The Langan report on pages 3 and 4 incorrectly states that Walmart Boulevard (East and West) is a "two-lane private driveway" with no posted speed limit. The very next point is that "Rena Avenue is a two lane east west local road under local jurisdiction." When these statements are shown grouped together, it is very misleading. Walmart Boulevard is at least 5 lines wide (three lanes exit Sam's and Walmart, and two lanes enter each property). Knowing that this is a misleading statement, I suspect that there is a lot more other misleading information

The Governor doesn't know this town and he is way out of line to try to bully the Hudson Selectmen into approval this monstrous Hillwood proposal. The Selectmen thus far have done a fantastic job with studying all aspects and trying to remain impartial. I urge you to continue to weigh the facts, at least until the NHDOT concludes its traffic findings. A Governor who is seeking re-election in a year when he knows his political party is flailing is trying to bribe Hudson with only the promise "of the preliminary design and engineering phase" of Hudson Boulevard. He uses the language that "the timeline to in which project funding is available is limited" because of economic conditions. It is not true. The State DOT has millions of excess funds which I learned from attending the NRPC meeting. Our infrastructure cannot handle the impact! Every day does not have to become a traffic nightmare as residents go to work and go about their normal activities.

***Response: As noted in other NHDOT correspondence filed with Staff Report #6, dated October 21, 2020, the NHDOT has reviewed and approved the TIS and the conceptual off-site roadway improvements.***

4. You may think Amazon wants to deliver packages to Hudson, but what it will really deliver is traffic and more traffic! Living near and traveling on Lowell Road is a traffic nightmare, especially at rush hour, in the afternoons and during the holidays. The developer estimates that Amazon will operate 150-250 trucks a day at the site. That equals about 1 tractor trailer truck every 6 minutes. If those trucks leave the same day, that will be 1 truck every 3 minutes. But, with 363 loading docks and an additional 840 truck parking spots, this facility can handle hundreds more trucks per day in and out. Hundreds of employee cars in and out each day will compound the traffic even further. The operation is proposed to run 24/7, 365 days a year! This is more traffic on a road that already has a grade of "F" from the State.

The residential neighborhoods and businesses off Lowell Road in South Hudson enter and exit ONLY onto Lowell Road. I know since I live in one of those neighborhoods. Trying to get out of our neighborhoods will be brutal. Expect longer commuting times. This increased traffic will impact people driving from Tyngsborough and Dracut as well. People will use the heavily-traveled back roads to avoid Lowell Road making them even more congested. Truck drivers using GPS are sure to find them as well. Remember these back roads are often narrow, winding, bordered by houses with kids and have no sidewalks. Many residents and truck drivers will head south to the Tyngsborough Bridge. Residents in North Hudson may opt to cross over the northern Hudson-Nashua bridges to avoid heading south. All of these bridges are also congested.

**LANGAN**

***Response: The TIS provides recommendations for improvements to the Lowell Road corridor. These improvements will not only mitigate the traffic impact of the HLC, but will significantly improve the existing conditions, greatly improving operating conditions experience by the community today. These conceptual improvements have been reviewed and approved by NHDOT. A detailed description of the truck and automobile distribution patterns is provided in the TIS, which indicates that the truck routing will be limited to Lowell Road between the proposed site driveways and Sagamore Bridge Road, to provide access to and from the FE Everett Turnpike. There is no efficiency advantage for the trucks to traveling local roads. The trip distribution follow industry standard methodologies and the site specific uses. This methodology has been reviewed and approved by NHDOT.***

5. These diesel trucks are likely to pollute the air; diesel fumes and particulates are known carcinogens. Trucks heading to the Sagamore Bridge could sit idling at the 3 traffic lights between the site and the bridge. Imagine this extra traffic at the Wal-Mart and Sam's Club intersection, especially on weekends and holidays. Both of those businesses allow trucks and RVs to stay overnight in their parking lots. Are they (and shoppers) up to potentially having lots of trucks parking overnight? I don't know about you, but Hudson doesn't need all this additional traffic. I vote NO to more traffic and NO to Amazon.

***Response: An Air Quality Impact Analysis was prepared for the project and submitted to the Planning Board. This analysis details the air quality impacts of the project and its compliance with regulations.***

6. I have listened to some of the meetings and I am not convinced they are being forthcoming with what these warehouses will actually be. I feel they are saying what needs to be said for approval, but this will be much worse for the town. I have friends that live close to this and it will be a nightmare for them. The traffic will be much worse than what they are projecting, not to mention they have no projections for 5-10 years down the road. I am 100% completely against this based on the proposal set forth from Hillwood.

***Response: The TIS provides recommendations for improvements to the Lowell Road corridor. These improvements will not only mitigate the traffic impact of the HLC, but will significantly improve the existing conditions, greatly improving operating conditions experience by the community today. These conceptual improvements have been reviewed and approved by NHDOT. The TIS provides a detailed analysis of both the projected opening year (2022) and a ten year projection (2032).***

7. The proposed warehouse would be enormous. There will be dozens or hundreds of large and small trucks moving up and down route 3; this will impact traffic flow for commuters in multiple towns including Manchester, Bedford, Merrimack, Londonderry. There could be impact to secondary routes also as all those trucks travelling to and from Manchester Airport (Logan too) seek fastest travel times.

# MEMO

***Response: A detailed description of the truck and automobile distribution patterns is provided in the TIS, which indicates that the truck routing will be limited to Lowell Road between the proposed site driveways and Sagamore Bridge Road, to provide access to and from the FE Everett Turnpike. There is no efficiency advantage for the trucks to traveling local roads. These proposed facilities have a very regimented material flow through them. The truck trips are spread out throughout the day with the vast majority of the truck trips occur outside the roadway peak hours. This further supports the position that traveling the highway routes for trucks is much more efficient than traveling on local roads or more circuitous routes. The trip distribution follows industry standard methodologies and the site specific uses. This methodology has been reviewed and approved by NHDOT.***

8. I strongly oppose the new Logistics Center. I live off of Bush Hill Road and we are a cut through from 93 to Route 3, traffic is usually steady but becomes unbearable when Lowell Road is backed up. With the new Logistics center coming into town the traffic will be backed up every day making Bush Hill a traffic nightmare. This narrow, windy road is not meant for the amount of traffic that this center will bring. Also, just trying to get out of side streets is already nearly impossible. I can't even imagine it worse. This center needs to be relocated to a remote area that can handle the traffic it will bring.

***Response: The TIS provides recommendations for improvements to the Lowell Road corridor. These improvements will not only mitigate the traffic impact of the HLC, but will significantly improve the existing conditions, greatly improving operating conditions experience by the community today. These conceptual improvements have been reviewed and approved by NHDOT.***

9. I don't think people realize the amount of traffic this will cause here and in Hudson. 200 tractor trailers and 50 box trucks per day (for starters!) doesn't include the fleet of Amazon vans that will follow and the cars of all the employees. It takes a long time for a fully loaded tractor trailer to get moving from a stop. The traffic near the proposed site is already congested as it is. Add that number of trailers, box truck and vans and it'll be gridlock all the time, not to mention the noise!

***Response: The Hudson Logistic Center does not include an Amazon delivery station which utilizes the vans mention. There will be no vans at this site.***

10. Per Hillwood Hudson Logistics Center's Website (June 6, 2020): "Approximately 150 to 200 tractor trailers and 35 to 50 box trucks will travel to and from the Logistics Center each day. The vast majority of the trucks entering and exiting the Hudson Logistic Center will come directly from the Everett Turnpike on Sagamore Bridge Road - two simple turns in both."

# MEMO

- a. When was the last traffic study completed? Did it incorporate Hillwood's estimate of 200 tractor trucks, 50 box trucks and 2,000 employee cars? Did it incorporate the additional cars from the 80 apartments being constructed at the old Friar property?

**Response: The traffic counts for the TIS were conducted in the fall of 2019, prior to any impact of COVID-19. The TIS has been updated in September 2020 and has been reviewed and approved by the NHDOT.**

- b. Does the Sagamore Bridge or the Everett Turnpike have the excess capacity for this additional traffic? What is the overflow affect to the feeder roads, Lowell Rd, River Rd, Dracut Rd, Wason Rd, Routes 101 and 111, and Route 3 North and South?

**Response: Sagamore Bridge Road is included in the TIS analysis and this has been reviewed and approved by NHDOT.**

- c. Hudson River Place (2006) published plans that had a direct access road from the Sagamore Bridge to the development, why is that not included in Hillwood's proposed plan? Hillwood's plans intend to use Lowell Rd to Mercury Systems Driveway (Walmart Blvd) and utilize the access easement to extend the road over the wetlands.

**Response: No direct access to Sagamore Bridge Road is needed or proposed for the project. The improvements proposed by Hudson River Place were never approved by NHDOT. NHDOT has also indicated that they would not prefer that kind of connection. The easement for the extension of the Mercury System driveway was a planning board condition of approval for that development, with the intent to provide future access to the redevelopment of the HLC site.**

- d. Has there been an independent validation to the developer's claims? The number of trucks in and out does not seem realistic (approximately 0.9% of capacity) and does not include the third building. What are the projections in 15 years (end of lease)? What is the maximum utilization of these buildings with several hundred loading docks?

**Response: The TIS and the methodologies used to develop the anticipated trip generation has been reviewed and approved by NHDOT. The TIS provides recommendations for improvements to the Lowell Road corridor. These improvements will not only mitigate the traffic impact of the HLC, but will significantly improve the existing conditions, greatly improving operating conditions experience by the community today. These conceptual improvements have been reviewed and approved by NHDOT. The TIS provides a detailed analysis of both the projected opening year (2022) and a ten year projection (2032).**

# MEMO

Hudson Logistics Center  
Hudson, New Hampshire  
Langan Project No.: 151010101  
November 4, 2020- Page 7 of 7

---

Thank you for providing the Hillwood Team with the opportunity to respond to these, and other, public comments filed with the Planning Board.

\\Wangan.com\data\BOS\data1\151010101\Project Data\Correspondence\Comment Response\Town Of Hudson\2020-11-03 Supplemental Public Comments - Traffic.docx

**LANGAN**