



**WESLEY G. REEKS, MAI**  
Real Estate Appraisers · Consultants

Wesley G. Reeks, MAI  
Jeffrey S. Bradley  
Teofelia M. Tyler

---

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

**From:** Wesley G. Reeks, MAI

**Info:** Brian Kutz/Hillwood  
John Smolak/S&V  
Nathan Kirschner/Langan

**Date:** December 16, 2020

**Re:** **Response to Public Comments – Market Study and Property Values**  
**Hudson, New Hampshire**

---

On behalf of Hillwood Enterprises, L.P. (“Hillwood”), the following are the responses to the public comment letters as related to market/property value matters concerning the proposed Hudson Logistics Center (“HLC”) received by the Planning Board with Planning Board Staff Report #1, dated May 27, 2020, through comments received with Planning Board Staff Report #6, dated October 21, 2020. Please note that we have attempted to be as responsive to the hundreds of pages of public comments received specifically related to market and property values, with the understanding that many of the earlier comments were received well in advance of our Real Estate Appraisal Services Report, as updated and supplemented by additional traffic-related documents of record (collectively, the “Market Report”). We also note that responses to Questions Nos. 21, 22, 23, and 25 were responded to with the assistance of Larry Lewis, MAI, Investment Advisory Services, of Trimont Real Estate Advisors. Moreover, we have edited some of the questions below so that they specifically relate to market-related concerns, with the understanding that responses to non-property value related comments have been, or will be, filed with the Board at a later date. Accordingly, below please find each numbered comment followed by our response which follows under each question as **Response**.

1. How is Hillwood proving there will be no significant diminution in the value of the surrounding properties as required in 275-6 of the site plan review?

***Response:*** Hillwood utilized two real estate appraisal firms, one international appraisal and consulting firm (Trimont) and myself, a local New Hampshire appraiser with 35 years real property valuation experience in all types of real estate, to ascertain the potential for ‘substantial diminution in value’ using generally accepted standards for property valuation.

2. I can’t help but see the destruction of home values. Today I looked at Zillow.com just to see what they think my home is worth. They have it at \$495,000. For tax purposes, the town has me at \$432,000. As I said, I have invested well over \$150,000 into improvements in my home. How many tens of thousands of dollars per home do we need to lose in value due to this monstrosity to justify the

low paying jobs and effects on the environment it will create? Dozens of families will be affected. Many of my neighbors, myself included, are wondering if after this is built will they ever be able to sell their homes at a price that isn't severely discounted due to having this facility behind us or in our neighborhood. In a study of Atlanta area commercial development (industrial, office and retail) by Associate Professor Jonathan A. Wiley, Ph.D. from Georgia University in April 2015 he found the following: Sites targeted for new industrial development exists in neighborhoods where values are relatively lower and already experiencing a downward trend in advance of the project completion. (My comment: This wasn't true for Hudson before to Covid-19) (Jonathan A. Wiley, 2015) Industrial is one of the least desirable land uses...a localized contraction in house prices appears during the predevelopment period... (Jonathan A. Wiley, 2015). At the .5-mile radius, property values are lower by 5 percent, compared to 3.5 percent at the .75-mile radius and 2.5 percent for the 1-mile radius. The downward trend that begins in the predevelopment period is most acute for the properties closest to the development site. (Jonathan A. Wiley, 2015) This project will affect all that surrounds it and for miles away. Works Cited. Jonathan A. Wiley, P. (2015). The Impact of Commercial Development on Surrounding Residential Property Values. Retrieved from <https://www.gamls.com/images/jonwiley.pdf> Lessard, R. (2020, May 2). Green Meadow golf course could face bulldozer in Hudson. Union Leader. Retrieved from [https://www.unionleader.com/news/business/green-meadow-golf-course-could-face-bulldozer-in-hudson/article\\_9fa3311d-adc2-5643-9768-6adc6d7890fe.html?block\\_id=853108](https://www.unionleader.com/news/business/green-meadow-golf-course-could-face-bulldozer-in-hudson/article_9fa3311d-adc2-5643-9768-6adc6d7890fe.html?block_id=853108) New Hampshire Department of Environmental Services. (2014). Environmental Fact Sheet: Diesel Vehicles and Equipment: Environmental and Public Health Impacts. Concord. Retrieved from <https://www.des.nh.gov/organization/commissioner/pip/factsheets/ard/documents/ard-44.pdf> THE Impact Project Policy Brief Series. (2012). Storing Harm: The Health and Community Impacts of Goods Movement Warehousing and Logistics. Retrieved from <https://envhealthcenters.usc.edu/wp-content/uploads/2016/11/Storing-Harm.pdf> Other works of interest: Distribution Centers and Nearby Neighborhoods <https://sites.google.com/view/distributioncenters/home?pli=1&authuser=1> What Amazon Does to Poor Cities, The Atlantic <https://www.theatlantic.com/business/archive/2018/02/amazon-warehouses-poor-cities/552020/>

**Response:** This question appears to focus mostly on the Jonathan A. Wiley study of 2015. This study was in the Atlanta, Georgia area, not southern New Hampshire. My analysis is based on data in southern New Hampshire only. I do not know, or know of, Mr. Wiley. According to his Curriculum Vitae, except for what appears to be a one-year engagement in 2006 with a real estate consulting firm in Atlanta (RCLCO), he comes from the 'academic world' where he has been an instructor and researcher since 2003. I have been a real estate appraiser and consultant since 1986 with 35 years of 'real world' valuation experience, and where I hold the highest commercial and residential appraisal designations – MAI and RM, respectively – that are awarded. As to the Mr. Wiley's study which includes 33 pages of mostly MLS and CoStar data from various radii around commercial/industrial areas and analyzed with various algebraic and trigonometric equations, there appears to be no 'boots on the ground' study of individual developments. Furthermore, the final paragraph on page 33 was not mentioned above. It reads: "Perhaps most surprising is the ***lack of evidence for negative and significant impacts of commercial real estate development on residential property values.*** Volumes of political arguments to the contrary are voiced at local planning debates across the nation, yet this study does not provide substantive evidence of a negative interaction."

3. Like many of my fellow neighbors, we have invested tens of thousands (some have invested hundreds of thousands) on the improvement of our homes. If the permits for this property go through there is no doubt going to be an impact on our home values. This is going to likely cause many people to rethink how much they want to invest in their home. It is going to negatively impact anyone who decides to sell their home. Any perspective home buyer looking at one of the homes in this neighborhood are likely going to have the same concerns as I have listed above. Has there been any consideration given to this? It is possible that if this project was not as big, and there was more buffer

between the abutters and the proposed development, that there would be less impacts on our property values? These are very important things to consider.

**Response:** This question includes generalized statements (“no doubt going to be an impact on our home values”) with no evidence to back them up. As an independent, outside, and impartial real estate valuation expert, I was commissioned to perform a study on the impact in residential values in the immediate area of the proposed HLC development. After extensive research with the use of generally accepted and appropriate methodologies, the Real Estate Appraisal Services Report, which concluded that the proposed Hudson Logistics Center will have no impact on the market values in Green Meadow Subdivision or other nearby residential properties, also confirms there is **no significant diminution in value** to the surrounding properties which is the standard provided under the Town’s Site Plan Review Ordinance. In fact, the report submitted to the Planning Board concludes “...that the proposed Hudson Logistics Center will have no impact on the market values in Green Meadow Subdivision or other nearby residential properties.” This study and analysis included actual data from two areas where residential properties are adjacent to large warehouse facilities. The data collected was from the local multiple listing service (MLS). Because this data source did not include ‘all the sales’ as observed by Mr. Coutu, a member of the Hudson Planning Board and Board of Selectmen, subsequent to my report dated 28 July 2020, I visited the Hudson Assessing Office where I spoke with Mr. Jim Michaud. I inquired as to additional data not represented in the MLS. There were several that were not, so I submitted a revised report to include the additional sales data. This additional data further bolstered the original conclusion of no significant diminution in value.

Of particular interest, this additional data include three sales transactions in Ridgecrest which were listed and sold since completion of the study. They are 18 Ridgecrest, 15 Rita, and 4 Rega. All three were listed for sale and sold since June 2020, *after* the proposed Hudson Logistics Center became public knowledge. The property at 15 Rita sold for \$350,000 in June 2020. It was on the market for six days with the contract price \$15,000 over the \$335,000 asking price. The property at 18 Ridgecrest sold in three (3) days for \$355,000, which was just over the asking price of \$354,900. The property at 4 Rega was a private sale which sold in September 2020 for \$338.65 per square foot, by far the highest price per square foot ever paid for a property in this subdivision.

Also, the property at 20 Fairway was under agreement at the time of the original study. It closed on closed 31 August 2020. The listing (asking) price was \$424,900, and the sales price was at the listing price. This property previously sold in August 2015 for \$345,000 indicating an average annual increase in value of 4.6%.

Lastly, 0 Rita Lane was listed for \$290,000 on 25 August 2020, and there was an offer and acceptance at the full asking price the same day (reported as 0 days on the market). This sale closed on 30 September. Worth noting is that this property sold previously on 20 January 2015 for \$205,000. The recent sale represents a 41% increase in value, or an average of just over 7% annually.

4. HLC will no doubt reduce property value. South Hudson will be impacted, and North Hudson to some extent. People won’t want to buy here and property values will go down.

**Response:** All evidence prepared suggests to the contrary, as people are buying in South Hudson, and at prices above any ever seen in this market. Furthermore, South Hudson has been “impacted” by a 295-acre industrial park (Sagamore) for 30+ years. My assumption is, not all, but most residents have moved to South Hudson during that period. It appears obvious that it did not impact their decision to locate here and consequently did not impact market values.

5. We chose this neighborhood for the tranquility of its character, the river and the golf course are intrinsic to the fabric and contribute to the values of our homes, how will Hudson's residents be compensated for the drastic change in environment from rural tranquility to uncontrolled urban development?

**Response:** Based upon the findings of the Real Estate Appraisal Services Report, which concluded that the proposed Hudson Logistics Center will have no impact on the market values in Green Meadow Subdivision or other nearby residential properties, no financial compensation is justified. See response to Question 3 above.

6. Property values would suffer. Is there any doubt in anyone's mind that home owners property values would suffer due to this massive industrial project. This should be of the utmost concern not just for the unfortunate homeowners within close proximity but everyone in town. Nobody would want these structures built in their neighborhoods and especially in their backyards. If this project was to be built I would say with a high degree of confidence that homeowners property values in the immediate neighborhoods would go down 10 to 25 percent. Abutters, especially on Eagle drive and Fairway Dr. may not even be able to sell their property without drastically discounting. Imagine being someone that just recently bought the past few years, on the incline of prices! As I indicated before, the "golf streets" neighborhood is a sought after one that I have personally seen many young families come into with the intention of raising their families and nest for the long term, 20-30 years due to the existing wonderful conditions and quality of life. In closing my profound position on this proposal to build the Hudson Logistics Center is not to approve. It's just too massive of a project for the area. The sheer size and scope of everything about it is jaw dropping to put into a residential area. The Green Meadow property may be commercially zoned but it is the furthest thing from a 380 acre commercial property in reality. The proposed Hudson Logistic Center is the commercial antithesis of what the current property is and has been for 60+ years.

**Response:** See response to Question No. 3. Also, what the property has been for 60+ years has no bearing on the current Highest and Best Use of the 380 acres today. I have appraised golf courses. Sales data on similar courses indicate values ranging from \$50,000 to \$100,000 per hole. At the upper end, that would be \$3.6 million. This amounts to \$9,474 per acre. Commercial/industrial land in good locations in southern New Hampshire sells for \$50,000 to \$300,000 or more per acre. There is no question that the Highest and Best Use is redevelopment to the maximally productive use of the land for commercial/industrial use. In other words, whatever the decision of the Planning Board on the HLC project, without a massive philanthropic influx of cash to purchase and sustain the golf course, this 380-acre site will no longer be Green Meadow Golf Course because the property's highest and best use is not for golf course use.

7. This development should not be permitted to proceed without completely and sufficiently addressing each of these issues including: \* Provide sufficient financial compensation to adjacent home properties to offset all direct cause in decreased property value and quality of life.

**Response:** No significant diminution in value, thus no financial compensation is warranted. See response Question No. 5.

8. The neighborhoods that will be directly impacted by this business are established residential areas. It is in the best interest of those neighborhoods to maintain the property values of those properties by rejecting this plan of land use. Their property will be devalued and when those families bought those homes it was with the expectation that it would remain the type of residential area it is today and has been since I moved here 40 years ago. I understand the desire of the family to sell their property but I beg you to plan some more appropriate use of this gorgeous strip of land along the

Merrimack. Today the Merrimack River is cleaner than when I first moved here. The type of development you have before you will not create a cleaner more environmentally sound area. It would be criminal to reverse the progress seen with the Merrimack River Watershed. It will be a giant headache! Vote no !

**Response:** See response Question No. 5.

9. Has a real estate study been performed or will be performed to evaluate the impact of this development?

**Response:** Yes, I studied potential impacts to residential real estate values in this location as reflected in my Real Estate Appraisal Services Report, which concluded that the proposed Hudson Logistics Center will have no impact on the market values in Green Meadow Subdivision or other nearby residential properties.

10. Will residents directly abutting the development be compensated for loss of property value?

**Response:** See response to Question No. 3.

11. The development of 2.5 million square feet of logistics space will cause damage to our neighborhood. Tractor trailers, vehicles, added traffic, trailer shifters that will be utilized in the yards of these buildings will diminish our property values and increase noise.

**Response:** See response to Question No. 3.

12. Will residents directly abutting the development be compensated for loss of property value?

**Response:** See response to Question No. 3.

13. If more trucks/vehicles are expected to pass my home [283 Lowell Road], I am concerned that this will mean my property value will go down because of increased traffic and noise.

**Response:** See response to Question No. 3.

14. There are many neighborhoods that surround the golf course that are long established and their property values and quality of life will suffer significantly. The size and scope of this center is far too large for a small town like Hudson.

**Response:** See response to Question No. 3.

15. The neighborhoods that will be directly impacted by this business are established residential areas. It is in the best interest of those neighborhoods to maintain the property values of those properties by rejecting this plan of land use. Their property will be devalued and when those families bought those homes it was with the expectation that it would remain the type of residential area it is today and has been since I moved here 40 years ago.

**Response:** See response to Question No. 3.

16. They say they are doing this for jobs and tax revenue however it is all about big business and not the town of Hudson. We have a 3% Unemployment rate pre-covid... all this is going to do is bring jobs to our boarder town in MA and we pay the price between property values, inhaling bad air and bad water and dealing with all the traffic. Maybe they should offer to buy out each house in our

neighborhood at \$1,500,000.00 each and we will all go away and they can have their big logistical center.

**Response:** House values in the 'neighborhood' in question are increasing substantially, even after the announced HLC project. Current prices (last four sales) are the highest per square foot recorded. And prices top out in the mid \$400,000 range, far short of \$1,500,000. As such, no compensation is due. See response to Question No. 3.

17. Will the planning board be putting the profits of the Friel Brothers, Hillwood, and the TWO unnamed companies before the real estate valuation losses to be incurred by the residents of south Hudson?

**Response:** No real estate valuation losses are anticipated. See response to Question No. 3.

18. What is more certain is that the non-stop operation of a large distribution center, including the constant movement of large trucks to and from the center, will have a major detrimental impact on the quality of life for many of the town's residents, contribute to traffic congestion in the area, and accelerate the wear and tear on our town roads. I'm no real estate expert, but I would hazard a guess that those sorts of changes would also have a significant adverse impact on residential property values over a fairly wide area of the town.

**Response:** See response to Question No. 3. We note there is already movement of trucks in the area due to Sagamore Industrial Park. One of the primary reasons that the planned use (HLC) is the highest and best use of the site is the nearby transportation corridor such that large trucks can easily access Sagamore Bridge Road and the Everett Turnpike with limited disruption of more secondary roadways in South Hudson.

19. The HLC will without a doubt reduce the property values of our neighborhood. While to a lesser extent, all of South Hudson will likely be impacted and perhaps even North Hudson as well. It will no longer be known as a residential area with shopping nearby. It will become a residential region with the largest industrial complex in NH. People won't want to buy here and property values go down.

**Response:** See response to Question No. 3.

20. Like many of my fellow neighbors, we have invested tens of thousands (some have invested hundreds of thousands) on the improvement of our homes. If the permits for this property go through there is no doubt going to be an impact on our home values. This is going to cause many people to rethink how much they want to invest in their home. It is going to negatively impact anyone who decides to sell their home. Any prospective home buyer looking at one of the homes in this neighborhood is likely going to have the same concerns as I have listed above. Has there been any consideration given to this? It is possible that if this project was not as big, and there was more buffer between the abutters and the proposed development, that there would be less impacts on our property values? These are very important things to consider.

**Response:** See response to Question No. 3.

21. Property Values. **Referenced Materials.** INK"<https://slack->

[redir.net/link?url=https%3A%2F%2Fecode360.com%2F14357761">\hhttps://ecode360.com/14357761.](https://ecode360.com/14357761)

**Introduction.** There have been concerns that this facility could significantly impact property values.

**Questions:** Have any calculations been made to assess the expected degradation in property values? Has any data been provided on the correlation of selling of homes in association of building distribution centers? What criteria is being assessed in order to determine the degradation of property values? What course of actions are being assessed to compensate Hudson, Nashua, and Tyngsboro community members?

Diminution of value of properties 275-6: <https://ecode360.com/14357761> "In the review of any nonresidential SITE PLAN conducted under this regulation, the PLANNING BOARD shall require that adequate provisions be made by the OWNER or his/her/its authorized agent for the following: A. The safe and attractive DEVELOPMENT of the site and to guard against such conditions as would involve danger or injury to health or safety, and no significant **diminution in value of surrounding properties** would be suffered." Targeting by real estate. Multiple real estate agents have provided targeted materials encouraging the sale of surrounding properties specific to the proposed development. Since value is based on community perception, and the amount that is willing to be exchanged in a fair market, and the community perception has clearly been actioned in accordance with expectations of diminished proper values, we have established reason to believe that the proposal would significantly diminish the value of surrounding properties.

**Response:** After extensive research with the use of generally accepted and appropriate methodologies, the Real Estate Appraisal Services Report, which concluded that the proposed Hudson Logistics Center will have no impact on the market values in Green Meadow Subdivision or other nearby residential properties, also confirms there is **no significant diminution in value** to the surrounding properties which is the standard provided under the Town's Site Plan Review Ordinance. In fact, the report submitted to the Planning Board concludes "...that the proposed Hudson Logistics Center will have no impact on the market values in Green Meadow Subdivision or other nearby residential properties." Based on Mr. Reeks' analysis, which now includes sales within the abutting subdivisions, HLC does not appear to have a negative impact on home prices in the subdivisions.

22. I see a number of methodological issues with the study that I believe make it of little or no use to you in determining whether there will be "no significant diminution in value of surrounding properties" as required by town code 275-6A. 1) Using even a 1 -mile radius may be much too large to see the largest property value impacts. Direct abutters are those most likely to see an impact, with decreasing impacts as distance increases. 2) The analysis compares property values before completion to after completion. However, property values are impacted once a project has been proposed or announced. 3) The comparison properties are not a good match to the proposed HLC: a) None of the facilities are as large as the proposed HLC, and the largest one in the list is actually at four separate addresses. b) It's not clear what was at these locations beforehand. Starting as a golf course is very different than starting as industrial space. c) Based on the satellite views provided in the report, it looks like all nearby residences studied are much further away than the residences on Eagle and Fairway are from the proposed HLC. In fact most of them don't even have residential properties directly adjacent. The Bellingham, MA example only shows residences across the street. 4) The counterfactual case compared was for a zip code or a county. However, specific neighborhoods may not track the overall area well. In each case a similar neighborhood (character, home values, age, style, etc.) which has historically matched the neighborhood in study, and those surrounding Green Meadows. 5) The connection between the data provided and the conclusions is not clear. For example, The July 2020 Trimont Conclusion states that: "It was determined in each instance, the compound average growth rate ("CAGR"), the average annual growth rate, and repeat sales comparison all showed after completion of these comparable commercial logistics center properties were flat to positive for each

data set (1-mile, 2-mile, county, et al.) " Attachment G. However, as an example, when you look in Exhibit 1 tables at the Littleton, MA example, they clearly report a 11.99% CAGR before project completion and a 7.95% CAGR after (1-mile radius). These numbers directly contradict the assertion above.

**Response:** When we originally began our analysis there had not been sales within the abutting subdivisions. As a result, and consistent with generally accepted and standard appraisal methodology, we sought out other subdivisions that might have been impacted by the development and construction of distribution facilities within the New England area. However, since there are now sales within the abutting subdivisions, we are of the opinion that these sales comps are now "comparable enough" to be able to make a determination as to whether there has been any value diminution.

23. The Fiscal analysis impact report - June 2020 has several major shortcomings which results in the report not adequately addressing the degree at which the development would certainly be expected to cause significant reductions in property values. 1. The analysis relies on averages of large datasets. This is a serious methodological issue which results in the analysis completely ignoring the most impacted groups (high value homes that are abutters of logistics center developments). 2. As it stands now, the fiscal analysis is critically insufficient for providing any meaningful justification regarding the affects to property values. 3. If we can empirically justify that high value homes that are abutters of logistics centers would be expected to suffer reduction in property values relative to the property value that would be expected if a logistics center was not built, then we can declare that the proposed logistics center is expected to cause significant impact to property values. 4. The analysis does not provide sufficient details about the realized property values in comparison with the expected property values. In order to justify impact it needs to consider the realized impact relative to a control group. 5. The analysis does not sufficiently address the impacts to property values to high initial value homes. It is quite obvious that the impact that a development would have to low value housing compred to high value housing is night and day. while a low value home wouldn't be expected to suffer greatly relative to its current value, high value homes would be expected to suffer much more. [Joe DiPiato]

**Response:** When we originally began our analysis there had not been sales within the abutting subdivisions. As a result, and consistent with appraisal theory, we sought out other subdivisions that might have been impacted by the development and construction of distribution facilities within the New England area. However, since there are now sales within the abutting subdivisions, we are of the opinion that these sales comps are now "comparable enough" to be able to make a determination as to whether there has been any value diminution.

24. Existing Zoning Land Uses. 1. The COMPARISON DATA presented supplies no analysis of whether the industrial facilities where built in existing Industrial Zones or required variances or special exceptions. If the land that was developed was already Zoned Industrial the surrounding Residential land uses would have a more stable and suppressed property values in before and after construction comparisons. 2. EXISTING HUDSON CONDITIONS are a G1 General zone adjacent to an R1 Residential zone. However, G1 zoning can be anything from a 367 acre 39 hole Golf Course to a 2.6 million square foot Logistics Center Industrial land use. This drastic change in land use adjacent to a residential use is a serious omission and flaw in the Hudson Logistics Center analysis concerning Property Value impact. Existing Zoning Density Requirements. 1. The COMPARISON DATA presented supplies no analysis of the density of the residential land use adjacent to the facilities chosen in the data. Are they zoned small



10,000 sq. lots, 43,560 sq. ft. (1 acre) lots or a mixture of zones and lot sizes? We do not even know if the facility was built on vacant land because it was a previous hazardous waste site. 2. EXISTING HUDSON CONDITIONS are adjacent lots that are zoned 1 acre in size on Fairway, Eagle, Birdie, Par, Muldoon and Chalifoux roadways. This is approximately a 90 home density on more than 90 acres of land south of the project. The existing density of Green Meadow Golf Course Club is one club house and a maintenance building. On 367 acres. The condition of the parcel is known to be a vast amount of grass with a few golfer divots in it. This will change to a 2.6 million sq. ft. of building and multiple acres of associated parking. This drastic change in land use density of structures adjacent to a low density residential use because of large lot size requirements is a serious omission and flaw in the Hudson Logistics Center analysis concerning Property Value impact. Construction phase effect on Property Values 1. The COMPARISON DATA presented supplies no analysis of home values during the construction phase. Construction is a dusty, noisy, visually unsightly confusion of activity especially so when it is an industrial facility being built next to a quiet rural neighborhood. Would a perspective buyer pay a preconstruction value when all this ongoing construction activity can be heard and visually observed? Was there blasting of ledge at the comparison data sites. That would certainly affect selling prices during construction. This lack of construction period impact data is a serious omission and flaw in the Hudson Logistics Center analysis concerning Property Value impact. 2. EXISTING HUDSON CONDITIONS what happens to the home value during the construction phase of the Hudson Logistic Center (HLC) if a home owner needs to sell because of a job transfer or some other compelling issue. On Fairway Drive if a home owner replaces the shingles on his roof the rest of us try to survive the noise and activity for approximately 3 days. However, we know the neighborhood has increased in value. The Town of Hudson Accessing Department is our expert witness concerning increases in Property Value from home improvement projects. The Hudson Logistics Center will take a tremendously longer dusty, noisy, visually unsightly confusion of activity than 3 days. Personally, I do not look forward to all the heavy construction equipment and dump trucks that are going to be required to build the earth berm to suppress the future HLC operational noise. I hope the dump trucks have backup noise suppression devices like what is being presented in the Noise Study for the operating facility while the earth berm is being built. Since no one will be able to sell their home during construction of HLC I guess the plan is to condition us to really appreciate it once it's built. Does the Noise Study even have a section concerning construction noise? Sorry about that I'm trying to stay on the single topic of Property Values but it is extremely hard when it is altered by many factors. Additionally, we won't know if blasting of ledge will happen because no one seems to have a Geotechnical report of field data Hillwood gathered in the month of June at the golf course. Remember all the drilling equipment roaming around during the Planning Board site walk. Unless the Planning Board demands the Geotechnical Study results our neighborhood is stuck with finding out if HLC will be a real blast to the surrounding areas until when construction is approved to start. I think it would be best to know now so necessary design revisions can be made to minimize blasting. However, that's just us abutters worried about the neighborhood Property Values because of lack of public disclosure of Geotechnical data that should be provided by Hillwood. Various project phases effecting Property Values and turnover rates. 1. The COMPARISON DATA does not analyze the pre-project awareness phase, public hearing phase, construction phase and full operational phases for Property Values and turnover rates in the sample data. Do they vary in each phase? The supplied data does not elaborate. If the turnover rates vary above or below the total average of all these phases we would have a better idea of what is happening during each phase. However, Attachment G the summary conclusions are made without this data in the report so we will never know. If you lump the pre-project awareness through full facility operational phases the averaging method will mask any intermediate gyrations. 2. EXISTING HUDSON CONDITIONS recently a house went on the market in our neighborhood area. At the same time public awareness in the HLC project was developing and concerned Hudson citizens started putting up signs and banners with SaveHudsonNH.org on them with slogans of concern about the proposed development of the Green Meadow Gulf Club. These signs and banners were placed throughout the neighborhood and high traffic areas in Hudson and surrounding Towns. It appears we are not in the pre-public awareness phase but in the public hearing phase. The perspective home buyer would have seen these and before committing to a huge multi-year mortgage would have investigated what it was all about so near the home for sell.

The house was removed from the market shortly after the signs were erected. That is actual real time data on turnover rate and associated Property Value suppression impacts in Hudson during only an intermediate phase of the HLC project. Community Comparison. 1. The COMPARISON DATA does not analyze or give us much back ground on the communities where the sample facilities are located. There is not any demographic information about the sample communities in the report. So how do we know if they even come close to being similar to Hudson? Are they Industrial, Rural or a mixture? This lack of demographic information is a serious omission and flaw in the Hudson Logistics Center analysis concerning Property Value impact. 2. EXISTING HUDSON CONDITIONS we live here and know what it's like. Simply it's a great place to live even if our existing Zoning Laws allow an Industrial use next to a Residential use. It requires though that the Planning Board and public have to be extra diligent in gathering all the pertinent facts and data to make knowledgeable and logical decisions. Fortunately all involved in this decision process care about the future quality of life in the Town of Hudson. The proposed unprecedented gigantic HLC project would have significant impact on Property Values in any New Hampshire community where it is built.

**Response:** With respect to the various comments and topics within this question, these factors would be encompassed in the recent sales in the surrounding and impacted subdivisions. Specifically, zoning changes, noise, construction, etc., would all be evidenced within each sale or offering in the adjacent subdivisions. However, and as presented in the revised reports, sales that have occurred since the HLC has been in the public domain continue to show an increase in value. This trend is supported by the most recent listing for sale of 23 Fairway Drive which was listed on December 5<sup>th</sup> for \$564,000 and subsequently was under contract of sale three (3) days later in December 8<sup>th</sup>. It assumed that both buyer and seller are knowledgeable of all factors that may have an impact on value. That means it is assumed that the buyer in this transaction is aware that there will be an Amazon distribution center developed immediately north of the house they are purchasing. Since this transaction represents an increase in the value trends for the subdivisions, it supports our conclusion of no diminution in value due to HLC. In order to conclude that HLC will, in fact, have a diminution in value, it would be expected there would be longer marketing times and decreasing prices within the respective subdivisions. This simply has not been the case. Based on on-going analyses, there is no quantitative support for any diminution in value as a result of the HLC.

25. Property Values: Basic Flaws in methodology to reach conclusions: a. All the expert analysis presenters love to quote 1 mile and 2 mile radius impacts to home values which skews and masks the true diminishment of home value to the immediately direct abutter. To phrase it another way if your home is adjacent to the epicenter of an earth quake it will be destroyed but the farther away you are there is minor damage. The Hudson Logistics Center is a Category 10 earth quake to the Town of Hudson. b. Look at the turnover rates of homes in the comparison data. I have lived in the Fairway Drive neighborhood for 33 years. A neighborhood newbie has only lived here approximately 10 years we do not have much of a turnover rate. Why because Hudson is a special place to live and our neighborhood even more so. c. The four comparison models have homes on collector streets instead of residential neighborhood ones or are shielded from impacts due to surrounding community conditions. How can that compare to the pleasant Eagle Drive, Fairway Drive, Birdie, Par and Muldoon residential subdivision?

1. The basic flaws in the their analysis that there will be no diminishment in market value of neighboring residential homes can be easily seen in the comparison samples used in the report.
2. 355 Maple Street, Bellingham, MA 249,972 sq. ft. building. Residences are on main collector road and not in the loop road neighborhood behind them. The before and after development homes evaluated would not have a large average change in price.

3. 99 International Dr., Windsor, CT 1,015,183 sq. ft. building. Residences are on main collector road adjacent to Logistics Center. Before and after development homes evaluated would not have a large average change in price.
  4. The Airport Portfolio (Manchester NH - Boston MA Regional Airport) 1,639,240 sq. ft. building. How can you say there is a comparison to a quiet residential neighborhood adjacent to golf course and located on a residential non-collector
- d. Attachment G? How does the existing Fairway Drive compare to a busy airport with all its noise and pollution? Need I say more about this comparison, there isn't one? e. Industrial Development: 3 Distribution Center Circle, Littleton, MA 450,000 sq. ft. building. Two of 5 homes accessed are on a collector road. The remaining 3 are on a loop road that exits away from the Distribution Center so probably never affected by increase in traffic to get to even local retail shopping areas. Note Distribution Center has no parking lot facing neighborhood, notice loading docks are shielded from neighborhood by adjacent building at 90 degree angle. Note Public Works Department were they always there? Did /does its present also suppress changes in home values?

All of the above comparisons to the Eagle and Fairway Drive properties are flawed. In real-estate they say Location, Location, Location is all you need to know. However, one of those Locations is quality of the neighborhood. Do they really think that going from a next door neighbor who is a Golf Course to a busy 27/7 365 day a year Logistics Center will not affect home prices. Did they evaluate that the majority of homeowners in the neighborhood have been in the neighborhood for 10 to 35+ years. I have been at 4 Fairway Drive for 33 years. Why because this area of Hudson has retained its rural character all that time. Is Hudson so desperate for jobs and tax dollars that we have to sell the soul of Hudson rural character to get them? The proposed development is definitely a category 10 epicenter earth quake to this neighborhood.

Glance again at the Laudone report, it's just more data with the flawed 1 and 2 mile methodology of determining home values. Where is the analysis of the types of neighborhoods affected, the size and location of the industrial development within the community, etc.? Common sense dictates you cannot have this intense of a development near a peaceful neighborhood without significant loss of home market and assessment value no matter how the experts use data that skews or masks the actual results. Just ask any non-expert home buyer would you pay the same amount for a home adjacent to a 367 acre golf course as you would a 367 acre industrial facility? The only credential they need to qualify a creditable conclusion is common sense.

**Response:** When we originally began our analysis there had not been sales within the abutting subdivisions. As a result, and consistent with appraisal theory, we sought out other subdivisions that might have been impacted by the development and construction of distribution facilities within the New England area. However, since there are now sales within the abutting subdivisions, we are of the opinion that these sales comps are now "comparable enough" to be able to make a determination as to whether there has been any value diminution.

26. Thank you board for the opportunity to make public comments on the HLC project and the fiscal impact study presented by Hillwood at the August 12 planning board meeting. While I may have fallen off a turnip truck as some point, I don't believe it was recent. Question regarding Real Estate Evaluation - My comments are reflective of the presentation of the developer. It does not seem that the developer has spent an appropriate effort in providing a meaningful evaluation of real estate valuations. The gap in real-estate transactions in the Rena neighborhood that the developer referenced in their presentation should certainly stand out as an error in their thoroughness. As one of the board member

noted, there have been transactions in the neighborhood and Southern NH is certainly hot market in property transactions. At a minimum, information is easily available Town website under the GIS map on property transactions. At the top level you can see the year and price the seller paid to buy the property as well as the year and price for the current owner. You can drill down to see more transaction history. Certainly back to the 1990's. As for private transactions, the developer states that this information isn't easily found. The GIS map seems to show all the transactions, including what would appear to be private transactions. By way of example, one of the properties (in Fairway neighborhood) relatively recently transacted at \$100k. Easily recognized as an outlier, this was likely a private sale. If I can find the information, I would assume that an expert in the field would have been able to find it. The developer, in my mind didn't make a reasonable effort on the real estate impact worthy of the respect of the residents of the town of Hudson.

**Response:** Northern New England Real Estate Network (NNEREN), the multiple listing service which covers all of New Hampshire was utilized in our initial report. This is because the vast majority of residential transactions in this area are listed and sold by Realtors who utilize this system. As noted in the hearing, there were several sales within Ridgecrest subdivision that were not included in MLS. In order to be all inclusive, i.e., not miss any arms-length sales, records from the Hudson Assessor's Office were requested and provided. These, as well as other recent transaction that sold through NNEREN are included in the revised valuation analysis dated 16 December 2020. Sales data, including those listed through NNEREN and private sales, indicate that there is no evidence of a diminution in value.

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