



April 16, 2020

Christopher Wider, Chairman  
Town of Norfolk – Zoning Board of Appeals  
One Liberty Lane  
Norfolk, MA 02056

Re: Norfolk, MA – The Preserve at Abbyville, 40B  
Response to Traffic Comments Review

Dear Chairman Wider:

BETA Group, Inc. (BETA) has reviewed the *Proposed Abbyville 40B Development Response to Traffic Peer Review Comments* letter dated April 15, 2020 by Green International Affiliates, Inc. (Green), which responds to several comments submitted by BETA in their letter dated March 27, 2020. This letter serves as a review of the responses provided by Green. Where referenced, the term “Applicant” refers to either the Applicant itself or its design consultants.

BETA Comment T1: MassDOT requires traffic data to be less than two years old; however, additional counts are not recommended at this time due to the ongoing health crisis, which has notably impacted traffic volumes in the Commonwealth. Updated counts could be conducted at when traffic volumes and patterns return to typical levels.

*Green Response: Over the past several years, we have collected substantial amount of data in the project area in response to comments and requests. For this update, an additional 2019 count was collected at a location of the proposed site drive. Data from 2017 as well as 2015 were also utilized and as Beta has indicated, our approach to adjusting the data to create a reasonable estimate of existing base conditions for the study area for this updated analysis was reasonable. While MassDOT suggests having data no more than two years old, it is a guidance and they themselves have been known to accept older data in certain locations. In this case, data for two of the three study locations was two years old or less and then we used historical information to adjust the third location. In our opinion, there is no need to collect additional data in order to understand the potential traffic impacts of the proposed project.*

BETA Response: No further comment.

BETA Comment T2: Provide a discussion for the development in Franklin.,

*Green Response: The discussion related to No-Build Development contained in the traffic report (Sections 3.1.2 and 3.1.3) was not as clear as it should have been. For this update study, new research and contact was completed with the abutting town planning departments. The two site specific projects included in the update were Park Place (92 homes) and a project in Franklin off Chestnut Street known as the Chestnut Street Senior Village (33 units of age restricted use). While Park Place has been under construction for some time now and there is some current occupancy, we estimated traffic for the entire 92 units since we were not sure how many homes were occupied at the time of the 2019 counts. Related to the Franklin project, it has not started construction and while it is a small generator of traffic and could have been assumed to be in the background growth rate, it was included as a site specific project with some traffic added to Chestnut Street which would pass by Mill Street.*

BETA Response: Discussion provided. See Comment T3.

BETA Comment T3: Provide backup information in the Appendix for the nearby development trips.

*Green Response: The backup information for the No Build growth developments is attached to this letter.*

BETA Response: The appended trip generation worksheets do not easily compare with turning diagrams presented in the December 2019 traffic study. Recommend the Applicant present background trip data on a turning diagram similar to the proposed trip generation to easily understand background trip distributions and volumes.

BETA Comment T4: There appears to be a typo on page 19 which refers to "Chestnut Hill Street."

*Green Response: That was a typographical error and should have simply said "Chestnut Street."*

No response required.

BETA Comment T5: Analysis sheets provided in the Appendix were found to have mismatched parameters between AM and PM peak hours. Revise accordingly.

*Green Response: The tables were corrected and are attached to this letter. The corrections were relatively minor and did not change our findings or conclusions.*

BETA Response: An updated Level of Service table was provided. Provide updated analysis worksheets for comparison.

BETA Comment T6: Analysis sheets provided in the Appendix were not found to match results presented in Table 5 and Table 6 of the TIAS. Clarify and revise accordingly.

*Green Response: The tables were corrected and are attached to this letter. The corrections were relatively minor and did not change our findings or conclusions. We apologize for the confusion.*

BETA Response: Tables provided. Provide updated analysis worksheets for comparison.

BETA Comment T7: See Comment T1 relating to age of data. Similarly, collecting new data is not recommended at this time due to the unstable/unusual conditions.

*Green Response: As indicated in our response to T1, it is our opinion that additional data is not necessary to understand the potential impacts of the proposed revised development project. And while traffic volumes could potentially change in a short timeframe especially if there were significant development and growth that occurred in the project area, it is highly unlikely that travel speed data on a local low volume road such as Lawrence Street would change substantially over a short or even a long time frame unless there was a significant change such as modified speed limits or extensive speed enforcement put in place. That said, the sight distance analysis for the proposed site drive was based on both the posted speed of 30 mph but also 35 mph that approximated the 85<sup>th</sup> percentile speed. There is no need to collect additional travel speed data for this project area as the available information is more than sufficient to assess the site access point on Lawrence Street in terms of visibility. Sight line triangle plans have been submitted previously for the project.*

BETA Response: No further comment.

BETA Comment T8: Verify that a legal speed regulation exists for the posted 30 mph speed limit signs. If no such regulation exists, signs should be removed in accordance with MGL 90.18.

*Green Response: Multiple signs have been installed by the town along Lawrence Street. We have attempted to confirm through state sources on validity but as of now, we have assumed they are legally*

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*installed. If not, that would be an issue between the town and MassDOT to resolve and not the responsibility of the applicant.*

BETA Response: Coordination with MassDOT revealed there are no speed regulations on file for the area roadways. See Response to Comment T9.

BETA Comment T9: Verify that Lawrence Street meets the criteria for "Thickly Settled" as defined in MGL 90.17.

*Green Response: MGL 90.1 defines "Thickly Settled" as an area where "a territory or contiguous to any way ... where dwelling houses are situated at such distances as will average less than 200 feet between them for a distance of ¼ mile" or over. A quick review of the homes and distances along the stretch of Lawrence Street in the project area supports that definition. As noted in the report and above, the road is posted for 30 mph. The suggestion for additional THICKLY SETTLED signs as one enters this more densely populated section in both directions was to provide more emphasis and awareness to motorists to keep travel speeds to the intended limit. They are not essential since posted speed limit signs exist but were supplemental safety measures. The applicant will install if that is the pleasure of the Board or if peer review consultant concurs.*

BETA Response: Given the lack of speed regulations for the roadway, recommend the Town consider removing the existing 30 mph regulatory speed limit signs, in accordance with MGL 90.18, and replace them with THICKLY SETTLED warning signs and 30 mph (W13-1P) advisory speed plaques.

BETA Comment T10: Consider installing "Intersection Ahead" (W2-1) signs in advance of the proposed Bretts Farm Road and site Driveway intersection to alert drivers of the new four legged intersection configuration.

*Green Response: In addition to the proposed list of traffic mitigation actions listed in the traffic report that Beta has concurred with, we on behalf of the Applicant have no issue with adding this to the set of actions that will be done as a condition of the project.*

No response required.

If we can be of any further assistance regarding this matter, please contact us at our office.

Very truly yours,  
BETA Group, Inc.



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