

October 22, 2008

Ian A. Bowles, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Attn: MEPA Office – Nicholas Zavalas
RE: EOEEA #01982 - Payne's Crossing, Freetown, MA, Second Supplemental Final
Environmental Impact Report

Dear Secretary Bowles:

SRPEDD staff has reviewed the Second Supplemental Final Environmental Impact Report (SSFEIR) for the Payne's Crossing project in Freetown, MA and offers the following comments:

According to the SSFEIR, the total trips generated to the site (estimated at 15,872 per day) would be reduced by 3,016 trips due to "internal capture" (i.e. trip makers visiting both anchor stores), and an additional 1,928 trips reduced due to "pass-by" (i.e. impulse trips generated from vehicles passing by the site along South Main Street). Both of these assumptions are flawed.

Internal Capture Trips – We do not believe that the Payne's Crossing project, comprised of a discount superstore, a home improvement store, and one other small undefined retail store is an appropriate candidate for a 19% reduction in total trips due to internal capture. This assumes that 1 in 5 trips to the site intend to visit both the discount store and the home improvement store.

The SSFEIR justifies the use of an internal capture reduction because it calculates trip generation for each individual use – Discount Store ITE code 813, Home Improvement Store ITE code 862, and Undefined Retail ITE code 820. It is more appropriate to use **ITE code 820 Shopping Center** where the trip rate already assumes internal capture. The difference in total daily trips is 12,856 using their method, and 16,188 using the Shopping Center rate. The SSFEIR's method of artificially reducing their projected trip generation should be rejected by MEPA.

Pass-By Trips – The proponent uses what they consider to be a conservative 15% of their trip generation estimate to come from traffic already passing the site along South Main Street. We disagree with this assumption. The value of this location as a regional shopping destination is in its proximity to Route 24. The majority of spur-of-the-moment pass-by trips generated to Payne's Crossing will come from Route 24, and not from South Main Street. Therefore, all turning movements to and from the interchanges at Route 24 will be new trips that do not qualify for the pass-by deduction. SRPEDD suggests that a pass-by trip rate of no more than 5% be used in this instance for the turning movements at the South Main Street access road to the development.

The tables on the next page display the difference in daily trip calculated based on the proponent's assumptions versus those of SRPEDD's Transportation Staff. The dramatic difference in daily traffic generated to the Payne's Crossing site by our estimates requires a recalculation and distribution of daily and peak hour traffic, and recalculation of capacity analyses for each of the

alternatives presented in the SSFEIR.

ITE Code	Use	Trip Rate	Square Footage	Daily Trips
862	Home Improvement	29.8	167,000	4,976
813	Discount Superstore	49.21	195,000	10,476
820	Unidentified Retail	42.94	15,000	420
			377,000	15,872
		19% Internal Capture		- 3,016
		15% Pass-by		- 1,928
(SSFEIR) Payne's Crossing Net Daily Trips				11,038

ITE Code	Use	Trip Rate	Square Footage	Daily Trips
820	Shopping Center	42.94	377,000	16,788
		0% Internal Capture		0
		5% Pass-by		- 809
(SRPEDD) Payne's Crossing New Daily Trips				15,379

- The Proponent's mitigation at the South Main Street / North Main Street @ Water Street / Elm Street intersection continues to ignore this intersection's conflicting and confusing traffic controls. The mitigation proposed does nothing to improve upon the conflicting south and eastbound stop controls, their conflict with the westbound yield control, and the difficulty of those movements' competing with the northbound free flow. As we stated in our letter on the SEIR, the use of a stop line for the westbound Elm Street approach is not the proper traffic control markings for a Yield control according to the Manual on Uniform Traffic Control Devices. Figure 6-16 indicates the intent to "remove & reset yield sign" but the text (6.4.2 on page 134) states "relocate the stop bar on Elm Street". Which is it? Is it a continuation of the Yield control or a change to Stop control on the westbound approach to the intersection?
- Also regarding the South Main Street / North Main Street @ Water Street / Elm Street intersection, Figure 6-16 shows no improved pavement markings on the southbound and eastbound approaches currently controlled by stop signs. Ideally, signalization, or a roundabout design should be provided to address the needs of this intersection.

The proponent has not made a good faith effort to provide for transit service to the site by SRTA. SRPEDD has recently completed a study of the potential service impacts to SRTA if service were provided, and the conclusion is that a direct subsidy from the developer is necessary to offset the cost of service. The SSFEIR states that "Should service be extended to the site, any new transit ridership will generate revenue to help cover the cost of those services." and "Direct subsidies to SRTA are not anticipated." These statements demonstrate a lack of understanding of the problems associated with an extension of SRTA's fixed route bus system, the cost of providing public transit, and a desire by the

Proponent to avoid any cost
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implications. Enclosed is a copy of the SRPEDD study of this issue.

- The commitment for Pedestrian/Bicycle Accommodations within the site appear to be adequate, however, the Proponent must provide adequate roadway shoulders for bicycles along South Main Street if bicycle use is truly going to be encouraged.
- The annual report on traffic monitoring should be submitted to SRPEDD in addition to the MassHighway offices.

If you have any questions regarding the above comments, contact me or James Hadfield, Director of Highway Planning.

Sincerely,

Roland J. Hebert
Transportation Planning Manager
Deputy Director

Enc: SRTA Study

CC: Executive Office of Transportation & Public Works, PPDU
Bernard McCourt, MassHighway District 5
Freetown Board of Selectmen and Planning Board
Sen. Joan Menard
Rep. David Sullivan
Southeastern Regional Transit Authority