

TRANSPORTATION PEER REVIEW



TO: Bruce Hunchard, Chairman
Town of Franklin Zoning Board of Appeals

DATE: May 30, 2025

FROM: Steven C. Finden
Melissa Restrepo

HSB PROJECT NO.: 2025069.00

SUBJECT: Transportation Peer Review
Residences at 444 Central
444 East Central Street, Franklin, Massachusetts

Howard Stein Hudson (HSB) has conducted a transportation peer review of the materials prepared and submitted by TAG Central LLC (the Applicant) as part of the proposed development, known as Residences at 444 Central (the Project), located at 444 East Central Street in Franklin, Massachusetts. Our evaluation is based on the following documents:

- *Traffic Impact Assessment (TIA), Proposed Multifamily Residential Development 444 East Central Street (Route 140), Franklin, Massachusetts*, prepared by Vanasse & Associates Inc (VAI), February 2025;
- *Civil Site Plans for: 40B Multi-Family Site Development, 444 East Central Street, Franklin, Massachusetts*, prepared by Allen & Major Associates, Inc., February 11, 2025;
- *Alternative Conceptual Site Plan, 40B Multifamily 444 East Central Street, Franklin, Massachusetts*, prepared by Kyle Zick Landscape Architecture, Inc. (kzla), May 5, 2025; and
- *Comprehensive Permit Application, Residences at 444 Central, 444 East Central Street, Franklin, Massachusetts*, prepared by TAG Central LLC, February 27, 2025.

The proposed Project would involve the removal of the existing nursery and greenhouse buildings and the construction of 264 residential units in five separate, wood-frame buildings ranging from three to four stories in height, a standalone one-story clubhouse, and amenities including a swimming pool, fitness center, dog-park, walking-trails surrounding the existing stream, outdoor recreation area, and more. The Project will also provide 356 parking spaces, at a ratio of 1.35 spaces per unit.

The purpose of this review is to ensure that the study analysis conforms to industry standards as well as Town of Franklin Zoning Bylaws and the Rules and Regulations of the Franklin Planning Board, is applicable to the study area and region, and addresses the traffic and transportation concerns of the City of Franklin. The comments of our review or “issues” of these documents are summarized and presented in the following sections. The comments are organized by the same headers provided in our outlined scope of services.



Scope of Review

The following issues were reviewed as part of our approved scope of services:

- Study Area Boundaries
- Traffic Data Collection
- Selection of Peak Hour
- Vehicle Crash Data
- Off-site Roadway Projects
- Non-site Traffic
- Trip Generation
- Parking Demand
- Site Trip Distribution and Assignment
- Traffic Operations Analysis
- On-Site Planning and Parking
- Pedestrians/Cyclists
- Geometric Design Criteria
- Transportation Demand Management (TDM)/Mitigation
- Construction Period Issues

Existing Conditions

STUDY AREA BOUNDARIES

The Applicant defined the study area to include the following five intersections:

- Route 140/Aspen Way;
- Route 140/Big Y Supermarket and Franklin Town Hall driveways;
- Route 140/Glen Meadow Road/Central Square mixed-use development driveway;
- Route 140/Horace Mann Plaza and CVS Pharmacy driveways; and
- Route 140/Chestnut Street/King Street.

HSH Comment: *HSH generally agrees with the study area intersections. Aerial imagery was used to verify the roadway and intersection geometries provided by the Applicant. In general, the existing physical roadway and intersection conditions in the TIA are correct. No further action is required.*

TRAFFIC DATA COLLECTION AND ADJUSTMENTS

The Applicant conducted manual turning movement counts (TMCs) at the Route 140/Chestnut Street/King Street intersection during the weekday morning period (7:00 – 9:00 a.m.) and weekday evening period (4:00 – 6:00 p.m.) on Thursday, December 5, 2024, and during the Saturday midday (11:00 a.m. – 2:00 p.m.) peak period on December 5, 2024, and December 14, 2024. Automatic traffic recorders (ATRs) were also conducted on December 5, 2024, through December 7, 2024 (Thursday through Saturday, respectively) on Route 140 east of Stobbart's Nurseries.



HSH Comment: HSH agrees with the Applicant's traffic data collection. No further action is required.

The Applicant reviewed the Massachusetts Department of Transportation (MassDOT) weekday seasonal factors for Urban Group 3 and Group 4-7 roadways were reviewed. Based on this review, it was determined that traffic volumes for the month of December are between 4.2% and 9.9 % above average-month conditions. To provide a conservative (high) assessment of traffic volume conditions within the study area, no adjustment was made to the raw traffic volumes, as they are representative of above average-month conditions.

HSH Comment: HSH generally agrees with the Applicant's traffic volume adjustment methodology. No further action is required.

SELECTION OF PEAK HOUR

The Applicant studied a weekday morning peak period of 7:00 – 9:00 a.m., a weekday evening peak period of 4:00 – 6:00 p.m., and a Saturday midday peak period of 11:00 a.m. – 2:00 p.m. Based on the collected 2024 traffic data, the weekday morning peak generally occurs between 7:15 – 8:15 a.m., the weekday evening peak occurs between 4:30 – 5:30 p.m., and the Saturday midday peak occurs between 11:15 a.m. – 12:15 p.m.

HSH Comment: HSH generally agrees with the Applicant's selection of peak hour. No further action is required.

MOTOR VEHICLE CRASH DATA

The Applicant conducted a motor vehicle crash analysis for the study area intersections with data provided by MassDOT Highway Division Safety Management/Traffic Operations Unit for the most recent five-year period available (2017-2021), and a summary table was provided in the TIA. Based on the analysis, the majority of the reported crashes occurred on a weekday under clear weather conditions, during the daylight, and involved angled and rear-end type collisions that resulted in property damage only. One motor vehicle crash that resulted in a fatality was reported to have occurred at the Route 140/Big Y driveway/Franklin Town Hall driveway intersection. No motor vehicle crashes were reported to have occurred at the existing driveways that serve the Project site over the five-year review period. The Applicant also reviewed the MassDOT statewide High Crash Location List, which indicated that there are no Highway Safety Improvement Program (HSIP) eligible high crash locations within the study area.

HSH Comment: The Applicant completed the motor vehicle crash analysis following industry standards. No further action is required.



Future Conditions

NO-BUILD CONDITION

The Applicant explains the methodologies to estimate non-site traffic growth: the most frequently used procedure consists of estimating an annual percentage increase in traffic growth and applying to all traffic volumes along with a second procedure, which consists of estimating traffic generated by planned developments and assigning it to the area roadway network. The Applicant asserts that for this TIA both procedures were used.

Traffic-volume data compiled by MassDOT from permanent count stations in the Franklin area were reviewed to determine general traffic growth trends in the area. Based on this review, traffic volumes have fluctuated over the 10-year period between 2009 and 2019, with an average traffic growth rate of 0.45 percent. To provide conservative (high) traffic volumes, a higher 1.0 percent per year compounded annual background traffic growth rate was used to account for future traffic growth.

In consultation with the Town of Franklin Planning and Community Development Department, the following projects were identified as developments that would have an impact on the future traffic volumes at the study area intersections:

- **TAJ Estates of Franklin II, Mixed-Use Development, 230 East Central Street, Franklin, MA** – consists of the construction of a mixed-use development that will include 35 multifamily residential units and approximately 900 square feet (sf) of office space on the ground floor.
- **Mixed-Use Development, 70, 72, 88, and 94 East Central, Franklin, MA** – consists of the construction of a mixed-use development that will include 17 multifamily residential units and approximately 972 sf of commercial space. Traffic volumes for this project within the study area are expected to be relatively minor and would be reflected in the general background traffic growth rate.
- **Chestnut Senior Village, Chestnut Street, Franklin, MA** – consist of the construction of 44 senior housing units. Traffic volumes for this project within the study area are expected to be relatively minor and would be reflected in the general background traffic growth.

HSH Comment: HSH generally agrees with the Applicant's methodology in determining background traffic growth and specific planned development traffic. No further action is required.



OFF-SITE ROADWAY PROJECTS

The Applicant contacted MassDOT and the Town of Franklin to determine if there are any planned future roadway improvements projects expected to be completed by 2032 within the study area. Based on those discussions, no roadway improvements projects aside from routine maintenance activities were identified to be planned within the study area at this time.

***HSH Comment:** HSH agrees with the determination of the proposed roadway improvements projects in the vicinity of the study area. No further action is required.*

BUILD CONDITION

TRIP GENERATION

To estimate the Site-generated traffic for the proposed development, the Institute of Transportation Engineers' (ITE's) *Trip Generation, 11th Edition* was utilized based on the Land Use Code (LUC) 220 – Multifamily Housing (Low-Rise) and LUC 221 – Multifamily Housing (Mid-Rise). The Applicant estimates the project to generate approximately 1,410 vehicle trips on an average weekday and 1,206 vehicle trips on Saturday, with approximately 118 vehicle trips expected during the weekday morning peak hour (28 vehicles entering and 90 exiting), 127 vehicle trips expected during the weekday evening peak hour (78 vehicles entering and 49 exiting), and 105 vehicle trips expected during the Saturday midday peak hour (53 vehicles entering and 52 exiting).

The TIA also notes that the existing Stobbart's Nurseries will be removed to accommodate the proposed Project. A traffic volume comparison associated with the proposed Project to those of the Stobbart's Nurseries was conducted using trip-generation data published by ITE for a nursery/garden center. However, to provide conservative (high) traffic volumes from which to assess the potential impact of the Project on the transportation infrastructure, and given that traffic volume data was not collected at the existing driveways that serve the nursery/garden center, a reduction was not applied to the future traffic volumes.

***HSH Comment:** HSH agrees with the selected LUC and the traffic volume comparison. HSH agrees with the Applicant's decision to not apply a reduction to the future traffic volumes for a conservative (high) traffic analysis. No further action is required.*

TRIP DISTRIBUTION AND ASSIGNMENT

The TIA asserts that trip distribution patterns were developed based on a review of Journey-to-Work data obtained from the U.S. Census for persons residing in the Town of Franklin and then refined based on existing traffic patterns within the study area during the peak periods. Based on this



assessment, 40% of the Site traffic is expected to come from and head to Route 140 west, 35% Route 140 east, 10% Chestnut Street north, and 15% King Street south.

HSH Comment: HSH generally agrees with the trip distribution methodology. No further action is required.

TRAFFIC OPERATIONS ANALYSIS

To assess the potential traffic impact of the development on the adjacent traffic network, the following steps are involved:

- Determine existing volumes and analyze existing traffic operating conditions for the study intersections;
- Generate and analyze No-build traffic volumes by applying a background growth factor to the existing traffic volumes and adding approved/pending developments as well as planned transportation improvements, if any, and analyze traffic operations;
- Determine the traffic volumes to be generated by the proposed development;
- Distribute and assign traffic throughout the study area network; and
- Combine the background traffic volumes with the proposed traffic volumes to establish Build traffic volumes, analyze traffic operations, and identify mitigation of potential impacts.

The traffic operations analysis presents detailed measures of effectiveness (MOEs) to assess the operating characteristics of the study intersections. The MOEs reported are average vehicle delay, level of service (LOS), volume-to-capacity (v/c) ratio, and queue lengths. The LOS is a letter grade that is assigned to a range of vehicular delays at the intersection. LOS A represents little delay and is usually associated with low volume movements. LOS F represents higher delays and could indicate issues related to traffic congestion. The Applicant used Synchro traffic engineering software to analyze the intersections in the network. Synchro engineering software is an industry standard that allows engineering practitioners to model traffic operations based on various inputs such as traffic volumes and traffic control devices (stop signs, etc.).

As shown in the analysis, the signalized *Route 140/Big Y Supermarket and Franklin Town Hall Driveways* intersection continue to operate at LOS C or better under all analysis scenarios. The additional traffic generated by the proposed development is anticipated to increase delays by less than one second with vehicle queuing up to two vehicles.

The signalized *Route 140/Horace Mann Plaza and CVS Pharmacy Driveways* intersection is expected to not have a change in the overall LOS over the No-Build conditions. The additional traffic



generated by the proposed development is anticipated to increase delays of up to 3.2 seconds, resulting in vehicle queuing up to four vehicles.

No change in the overall LOS was shown to occur over the No-build conditions at the signalized intersection of *Route 140/Chestnut Street/King Street*. The additional traffic generated by the proposed development is anticipated to increase delays of up to 4.2 seconds, resulting in vehicles queuing up to three vehicles. However, Route 140 westbound left-turn movements decrease to LOS E and LOS F during the weekday evening peak hour and Saturday midday peak hour, respectively.

All the movements at the *Route 140/Aspen Way* unsignalized intersection are expected to operate at LOS C or better under all analysis scenarios. The additional traffic generated by the proposed developments is anticipated to have a negligible impact on delays (less than one second), resulting in vehicle queuing of up to one vehicle.

No change in the LOS is predicted to occur for any movement at the *Route 140/Glenn Meadow Road/Central Square Driveway* unsignalized intersection over the No-build condition. The additional traffic generated by the proposed developments is anticipated to be minor in vehicle queuing of up to one vehicle.

All exiting movements at the *Route 140/Project Site Driveway* unsignalized intersection are expected to operate at LOS C during the weekday morning peak hour, and LOS D during the weekday evening and Saturday midday peak hours, with vehicle queuing of up to one vehicle. All movements along Route 140 approaching the Project site driveway are expected to operate at LOS A with negligible vehicle queuing.

HSH Comment: *HSH generally agrees with the traffic operations analysis methodology and results. No further action is required.*

ON-SITE PLANNING AND PARKING

The TIA and Layout and Materials Plans assert that the project will provide 356 parking spaces at a ratio of 1.35 parking spaces per residential unit. The proposed parking supply is below the parking requirements of the Bylaws of the Town of Franklin; however, the parking ratio is within the range of observed parking demands for a multifamily residential development in a similar setting documented by the ITE Parking Generation, 6th Edition.

HSH Comment: *Based on the submitting plans, the Applicant is seeking a waiver to provide less than the required two parking spaces per unit, referring to the ITE Parking Generation, where the proposed parking ratio falls within the range of observed parking*



demands of similar residential developments. HSH generally agrees with the Applicant's proposed parking plan and waiver's request. No further action is required.

Electric vehicle (EV) charging stations should be provided within the Project site for use by residents.

Issue 1

HSH Comment: HSH requests the Applicant confirm how many parking spaces will be designated as EV charging stations spaces and recommends EV charging stations be provided at all five residential buildings.

Access to the proposed Project will be provided via a full-access driveway that will intersect the south side of Route 140 approximately 150 feet east of the driveway that serves 440 East Central Street (Franklin Medical Center) at the location of the existing easternmost driveway that serves the Project site. The Project will require the issuance of a State Highway Access Permit from MassDOT for access to East Central Street (Route 140). The section of the Project site driveway should be a minimum of 24 feet in width and designed to accommodate the turning and maneuvering requirements of the largest anticipated responding emergency vehicle. Vehicles existing the Project site should be placed under STOP-sign control with a marked STOP-line provided.

HSH Comment: Based on the submitted Fire Truck Turning Plan prepared by Allen & Major Associates, the Applicant asserts that the fire truck information was provided by the Franklin Fire Department. HSH generally agrees with the vehicular access plan and the submitted fire truck maneuvering analysis. No further action is required.

Four service/trash areas are shown in the Layout and Materials Plan, two on the western side of the Project site and two on the eastern side of the Project site.

Issue 2

HSH Comment: HSH generally agrees with the location of the service/trash areas; however, no service/trash area seems to be designated for the clubhouse building. HSH requests the Applicant confirm the trash operations for the clubhouse building.

Issue 3

HSH Comment: HSH acknowledge the delivery parking stall located across the clubhouse building; however, this delivery zone is designed for a typical delivery box truck (maximum 22-feet-long) for possible short-term deliveries. HSH requests the Applicant provide a



detailed plan as to where move-in/move-out activity will take place, including an AutoTURN analysis to demonstrate that all anticipated vehicles (moving and delivery trucks) can safely access the Site. If the parking areas are anticipated for move-in/move-out activities, demonstrate that moving vehicles will not block drive aisles while parked.

Snow Storage Plans prepared by Allen & Major Associates, Inc. depict approximately 35,497 sf of area available for primary snow storage within the Project area. This area is estimated to accommodate an approximate four feet of snowfall. Additional snow secondary snow storage areas are available on-site, if necessary. If the Project need snow to be removed off-site, the snow will be stockpiled on site until there is not enough space. The snow storage contractor will be responsible for properly disposing of the transported snow according to Massachusetts Department of Bureau of Resource Protection. Under no circumstances shall snow be stored in any wetland resource area or proposed stormwater management system. Snow storage will be implemented to avoid hydrants, fence landscaping, and other permanent features.

HSH Comment: HSH agrees with the Applicant's snow storage plan. No further action is required.

PEDESTRIANS/CYCLISTS

Sidewalks are proposed within the Project site to link the residential buildings and extend to Route 140, where a sidewalk segment is proposed to be constructed between the Project site driveway and the driveway that serves 440 East Central Street, the current terminus of the sidewalk along the south side of Route 140. Marked crosswalks are proposed within the Project site where pedestrian crossings are proposed and for crossing the Project site driveway that will include Americans with Disabilities Act (ADA)-complaint wheelchair ramps. Based on the submitted raw TMC data, the highest pedestrian activity occurs during the Saturday midday period at the intersection of Route 140/Chestnut Street/King Street with a maximum of 45 pedestrians and at the intersection of Route 140/Horace Mann Plaza and CVS driveways with a maximum of 19 pedestrians.

Issue 4

HSH Comment: HSH generally agrees with the proposed pedestrian facilities including the five-foot-wide sidewalks around the Site as shown in the submitted plan; however, to better understand the existing foot traffic along Route 140, HSH requests the Applicant provide a summary of the existing pedestrian volumes, with figures, at the study area intersections.

Secure bicycle parking should be provided at appropriate locations within the Project site, including weather-protected bicycle parking and exterior racks situated proximately to the main building entrances and at the clubhouse building.



Issue 5

***HSH Comment:** Bicycle parking areas are not shown in the plans. HSH requests the Applicant confirm the number of secure bicycle parking spaces and the number of exterior bicycle racks that the Project will provide and submit a revised site plan to confirm the location of these bicycle parking areas.*

GEOMETRIC DESIGN CRITERIA

The Applicant conducted a sight distance evaluation at the Project site driveway with Route 140. Both Stopping Sight Distance (SSD) and Intersection Sight Distance (ISD) measurements were performed. In accordance with the American Association of State Highway and Transportation Officials' (AASHTO's) *A Policy on the Geometric Design of Highways and Street (the Green Book)*, to maintain a safe operation of an unsignalized intersection, ISD should be at least equal to the SSD, though it is desirable to meet ISD requirements on its own.

The Applicant utilized the posted speed limit of 40 miles per hour (mph) along Route 140, which exceeds both the mean vehicle travel speed limit of 34 mph in the eastbound direction and 35 mph in the westbound direction, and the measured 85th percentile vehicle travel speeds of 38 mph in the eastbound direction and 39 mph in the westbound direction, to calculate the required SSD and ISD. Based on this evaluation, the required SSD at the Project site driveway on Route 140 is 305 feet for vehicles approaching from the east and west. The Applicant measured distances exceed the required SSD by more than 650 feet in both directions. The recommended ISD at the Project site driveway (looking to the east) is calculated at 445 feet for vehicles turning left and 385 feet for vehicles turning right (looking to the west). The Applicant measured distances exceed the recommended ISD by more than 650 feet in both directions.

The Applicant asserts that signs and landscaping within the intersection sight triangles area should be designed and maintained so as not to restrict lines of sight. Additionally, snow accumulations within the sight triangle areas should be promptly removed where such accumulations would impede sightlines.

Issue 6

***HSH Comment:** HSH generally agrees with the Applicant's calculations of the SSD and ISD. HSH requests the Applicant prepare a sight distance plan and show the sight triangles, showing the appropriate location of the vehicle at the site curb cut, and confirm that the field-measured distances are adequate and that the sight triangle areas are maintained clear of signs and landscaping.*



SITE IMPROVEMENTS

The Applicant is proposing the following on-site improvements:

- The section of the Project site driveway approaching Route 140 should be a minimum of 24 feet in width and designed to accommodate the turning and maneuvering requirements of the largest anticipated responding emergency vehicle.
- Vehicles exiting the Project Site driveway should be placed under STOP-sign control with a marked STOP-line provided.
- All signs and pavement markings to be installed within the Project Site should conform to the applicable standards of the Manual on Uniform Traffic Control Devices (MUTCD).
- Sidewalks are proposed within the Project site to link the residential buildings and extend Route 140, where a sidewalk segment is proposed to be constructed between the Project site driveway and the driveway that serves 440 East Central Street, the current terminus of the sidewalk along the south side of Route 140.
- Marked crosswalks are proposed within the Project site where pedestrian crossings are proposed and for crossing the Project site driveway that will include ADA-compliant wheelchair ramps.
- Signs and landscaping to be installed as part of the Project within the intersection sight triangle areas should be designed and maintained so as not to restrict lines of sight.
- Snow accumulations (windrows) within the sight triangle areas should be removed promptly where such accumulations would impede sight lines.

Issue 7

***HSH Comment:** HSH generally agrees with the proposed site improvements; however, HSH requests the Applicant prepare a sight distance plan and show the sight triangles at the Project site driveway to confirm that signs and landscaping do not restrict driver's lines of sight.*

OFF-SITE IMPROVEMENTS

The Applicant is proposing a variety of mitigation recommendations at the following intersections and locations in the vicinity of the Project in an effort to identify potential measures to improve traffic operations:

- ***Route 140/Chestnut Street/King Street*** – Overall intersection operations at this intersection were shown to maintain a LOS D or better during the peak hours with the addition of Project-related traffic; however, operating conditions for left-turn movements on the Route 140 westbound approach were shown to change from LOS D to LOS E during the



weekday evening peak-hour and LOS E to LOS F during the Saturday midday peak-hour as a result of the Project. To offset this predicted impact of the Project at the intersection, the Project proponent will design and implement an optimal traffic signal timing and phasing plan for the weekday evening and Saturday midday peak hours (no changes are required during the weekday morning peak-hour). This improvement will be completed prior to the issuance of a Certificate of Occupancy for the Project and subject to receiving all necessary rights, permits, and approvals. Table 13 of the TIA summarizes the results with the implementation of an optimal traffic signal timing and phasing plan, where motorist delays will be reduced to the extent that operating conditions will be similar to those under No-Build conditions.

- **Route 140 Corridor Improvements** – To facilitate long-term improvements along the Route 140 corridor between and including the Route 140/Chestnut Street/King Street intersection, and the Wrentham town line, the Project proponent will assist the Town to prepare a MassWorks or HousingWorks grant application. This assistance will include the preparation of a Corridor Improvement Study (CIS) with an accompanying conceptual improvement plan and associated preliminary cost estimate for the improvement measures. The CIS will be prepared in coordination with the Town and will be initiated within 3 months of the issuance of the first Certificate of Occupancy for the Project.

Issue 8

HSH Comment: Although HSH generally agrees with the Applicant's off-site mitigation measures to address project impacts, HSH requests additional information be submitted for both the mitigation measures at the Route 140/Chestnut Street/King Street intersection and Route 140 Corridor Improvements for review. These include:

- ***Preparation of cost estimates of each of the off-site improvements; and***
- ***Identification of any Right of Way (ROW) impacts associated with the proposed off-site improvements, and if any eminent domain actions or takings are required.***

TRANSPORTATION DEMAND MANAGEMENT

The Applicant asserts that in an effort to encourage the use of alternative modes of transportation to single-occupant vehicles, the following Transportation Demand Management (TDM) measures will be implemented:

- A Transportation Coordinator will be designated for the Project to coordinate the elements of the TDM program;



- The Transportation Coordinator should facilitate a rideshare matching program for residents to encourage carpooling;
- A “welcome packet” should be provided to new residents and employees detailing available public transportation services, bicycle, and walking alternatives, and other commuting options;
- Information regarding public transportation services, maps, schedules, and fare information should be posted in a central location and/or otherwise made available to residents;
- A pick-up/drop-off area or short-term parking should be provided for use by carshare and delivery service providers, as well as Amazon, UPS, and FedEx;
- Specific amenities should be provided to support telecommuting, which may take the form of meeting/collaborating spaces, a business office, or similar accommodations;
- A central mail room and package delivery station should be provided;
- EV charging stations should be provided within the Project site for use by residents; and
- Secure bicycle parking should be provided within the Project site, including weather protected bicycle parking and exterior bicycle racks situated proximately to the main building entrances and at the clubhouse building.

Issue 9

HSH Comment: HSH generally agrees with the proposed TDM measures; however, the pick-up/drop-off zone for carshare was not located on the submitted plans. HSH requests the Applicant provide more information of this zone within the project site. HSH also requests the Applicant confirm how many parking spaces will be designated as EV charging stations spaces and recommends these stations be assigned to each building. Lastly, HSH requests the Applicant also confirm the number of secure bicycle parking spaces and the number of exterior bicycle racks that the Project will provide, and submit a revised site plan to confirm the location of these bicycle parking spaces.

CONSTRUCTION PERIOD ISSUES

The Applicant does not provide details on any anticipated construction period issues.

Issue 10

HSH Comment: HSH encourages the Applicant to evaluate the short-term construction impacts of the Project and provide preliminary details of the overall construction schedule, working hours, number of construction workers, transportation and parking, number of



construction vehicles, and routes to and from the Project site. To minimize transportation impacts during the construction period, HSH suggests the Project proponent limit the number of construction worker parking spaces on-site, encourage workers to carpool, and provide secure spaces on-site for workers' supplies and tools.