

Memo To: RPC Development of Regional Impact Subcommittee
From: Rockingham Planning Commission Staff
Date: May 12, 2022
Subject: Industrial Way Subdivision and Site Plan Applications– Plaistow Regional Impact Declaration

Rockingham Planning Commission (RPC) was notified on April 20, 2022 that a subdivision and site plan application before the Plaistow Planning Board was declared a development of regional impact under RSA 36:55. The proposal submitted by How-Plaistow LLC, proposes to construct a 301,000 square foot warehouse facility located at 214 Plaistow Road (NH Route 125) in Plaistow, NH. The proposal includes construction of a private roadway (Industrial Way) and to reconfigure several lots that will result in three lots accessed via the private roadway. The proposed private roadway will serve as access to the warehouse facility. At the direction of the RPC Regional Impact Committee chair, RPC staff was requested to write a memo regarding potential regional impacts. **The Committee motioned at its May 12, 2022 meeting to forward the RPC staff review memo to the Plaistow Planning Board for its consideration.**

The proposal is to be located off Plaistow Road (NH Route 125) and a proposed private roadway (Industrial Way), south of the Kingston Road intersection, and near the Plaistow/Kingston town boundary. The proposal is within Plaistow's Industrial II Zoning District, is fully within the Aquifer Protection District Ordinance, and has portions of the lots subject to the Wetlands Ordinance regulations. The municipalities with potential impacts from the proposal, as determined by the Plaistow Planning Board include, Kingston, Newton, Hampstead, Atkinson, and Haverhill, MA.

Comments below regard the proposal's potential regional impacts as identified under RSA 36:55 that can reasonably be expected to impact on a neighboring municipality, because of factors such as, but not limited to, the following:

I. Relative size or number of dwelling units as compared with existing stock.

The proposal is for a non-residential use and is not anticipated as having any impact on existing or future housing stock for the region.

II. Proximity to the borders of a neighboring community.

The proposal is located fully within Plaistow but is located east of the Plaistow/Kingston town boundary. As noted above, the proposal is located within Plaistow's Industrial 2 District; the area is surrounded by mainly commercial uses, with some residential uses located to the south and east of Route 125.

III. Transportation networks.

- **Traffic Impact Study:** Overall, the Traffic Impact Study (TIS) completed by Vanasse and Associates Inc (VAI) utilizes appropriate and practical assumptions, and the analysis produces an estimated volume of vehicle trips generated from the proposed warehouse facility that is reasonable and consistent with those assumptions.
- **Traffic volume:** NHDOT data indicates that Average Annualized Daily Traffic on NH 125 was 8,605 (2021) at a site just north of the site driveway and 11,257 (2021) at a site just south of Old County Road. The adjustments of those volumes to account for COVID

related decreases and peak month travel use a methodology and adjustment factors consistent with best practices as do the future year estimates.

- **Trip Generation:** Analysis in the TIS indicates that the 301,000 square feet of warehouse would generate approximately 1,938 trips per day (50% entering/50% exiting) using the ITE Trip Generation Manual, 11th Edition land use code "155 – High-Cube Fulfillment Center Warehouse - Sort." About 32% of the trips are expected to occur during peak periods on NH 125 with 13.5% during the AM peak and 18.6% during PM peak hours. This would add an average of 262 trips on NH 125 during the AM peak period and 361 during the PM peak period.
- **Trip Distribution:** The distribution of trips from the site is based on current Journey-to-Work data from the Census Bureau for passenger cars, and current truck travel patterns in the area. This analysis indicates that 25% of passenger vehicle trips would be to/from the North and 75% to/from the South on NH 125, and this is consistent with the census data which indicates that people who work in Plaistow tend to live to the south and west of the community. Truck trips are anticipated to have a 33%/67% North/South split based on existing traffic patterns and the proximity to Interstate 495 in Haverhill, Massachusetts which is a reasonable assumption as well.
- **Safety:** The TIS indicates that sight distance from the proposed site driveway is adequate on NH 125 given existing volumes and travel speeds. The analysis also indicates that left and right turn lanes warrants are met (and recommended) for the site driveway which will allow for safer turning movements and less disruption to through traffic. No crash data information for that location is available at this time but has been requested from Plaistow and Kingston by the consultant team.
- **Intersection Operations:** The TIS estimates that no traffic signal is warranted at the site driveway and that exiting the site will operate at a Level of Service (LOS) "C" during the AM peak period on NH 125 and at LOS "F" during the PM peak period. This translates to average delays of 15-25 seconds per vehicle in the AM and >50 seconds per vehicle in the PM. Traffic on NH 125 will not be significantly impacted or delayed at the site driveway. The additional traffic at the site will impact operations at adjacent signalized intersections, particularly at the NH 125/Old County Road signal during the PM peak hour which sees multiple movements drop in LOS. A signal timing optimization plan is proposed to address this additional intersection delay.

IV. Anticipated emissions such as light, noise, smoke, odors, or particles.

Anticipated emissions are expected to be primarily limited to those related to transportation and may include noise and air emissions from vehicles. To mitigate noise and air emissions it is recommended that there be measures put in place to limit truck idling (electrification, time restrictions, etc.) and potentially limiting hours of operation.

To understand impact of any lighting, it is recommended that the Plaistow Planning Board review lighting proposed with the development to ensure no light spillage occurs onto neighboring properties, roadways or sensitive wildlife habitat. Based on the information provided it appears that the warehouse facility meets this recommendation. If lighting is proposed for the private roadway, it is recommended that Plaistow ensure its outdoor lighting regulations are followed to alleviate any lighting impacts.

V. Proximity to aquifers or surface waters which transcend municipal boundaries.

The proposal is located within the Wellhead Protection Areas (WHPA) for a public water supply well located in southern Kingston. This proposal is located within Plaistow's Aquifer Protection District and requires a specific development standard be met to ensure protection of groundwater resources. The proposal will also require NHDES approval for a proposed public water supply well; no public water or sewer is currently accessible to this site.

The entire proposal also is located with the regulated, urbanized area in Plaistow that is subject to the federal MS4 Stormwater Permit. As such, Plaistow is required to implement

regulations that reduce stormwater runoff pollution on developments such as this proposal from entering surface and groundwater sources. Given the scale of the proposal and large propose area of impervious surface, Plaistow should consider requiring stormwater standards that conform to the requirements of the MS4 Permit. Any stormwater generated from the proposal that enters on to municipal property (including roads) or state property (again, including roads), could leave the municipality or state responsible for the treatment of that stormwater.

VI. Shared facilities such as schools and solid waste disposal facilities.

The proposal does not appear to rely on any shared municipal facilities, however, there is potential to required shared municipal emergency services given the location near Kingston, Hampstead, Newton and Haverhill, MA.

RECOMMENDATIONS:

- To mitigate potential groundwater water impacts, it is recommended that Plaistow require NHDES Best Management Practices for Groundwater Protection (Env. Wq 401) are followed.
- Given the proposed use of a private roadway, it is recommended that Plaistow require that that any winter roadway maintenance service be provided by a NHDES GreenSnow Pro certified entity. This will help to mitigate salt usage that can negatively impact water quality, while granting liability protection against damage from winter road conditions.
- To mitigate any potential surface water pollution, it is recommended that any proposal be required to follow stormwater regulations required Plaistow's zoning regulations and that Plaistow implement the conditions of their wetland ordinance that are applicable.
- It is recommended that the Planning Board receive input from municipal emergency services personnel and Select Board regarding the handling of emergency services.
- To facilitate the traffic safety assessment of the driveway access to NH125, provide crash data to the applicant's traffic engineering team.
- Require power (aux power units/shore power/standby power) at loading docks and truck parking spaces to minimize idling and vehicle noise.
- The amount of parking required seems excessive given the size of the building being constructed. Consider reducing parking requirements to further reduce impermeable surfaces on the site.
- Developer is coordinating with NHDOT regarding the interaction of the site driveway with the Plaistow-Kingston 10044E project. Developer should also coordinate with NHDOT regarding the proposed signal optimization plans and implementing improvements/changes that are consistent with NHDOT project Plaistow 40645 which will implement signal coordination and control along NH 125 between the Massachusetts state line and Old County Road.

Finally, it should be noted that the above comments and recommendations are considered advisory only. The RPC, nor the impacted municipalities, have any authority under the regional impact statute to interfere with the decision-making power held by the Plaistow Planning Board.

Cc via email:
Town of Plaistow Planning Board
Town of Kingston
Town of Newton
Town of Hampstead
City of Haverhill, MA
