

To: Att: Mr. Kenneth Perro, Chair  
Board of Appeals  
Municipal Office Building  
127 Elm Street  
Millbury, Massachusetts 01527

From: Evan Drew, PE PTOE  
David Glenn, PE

CC: Conor McCormack  
Director of Planning & Development

Stantec Consulting Services,  
Inc.  
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Burlington, MA 01803

Project/File: 179411162

Date: March 26, 2024

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**Reference: Comprehensive Permit Application (40B) 15-17 Rice Road Residential Development – Traffic Impact Study Update – February 2024 – Crash Data**

**Subsequent to our memo from March 11, 2024, and pursuant to the Town’s request, Stantec Consulting Services, Inc. (“Stantec”) has reviewed the public comment provided by Steve Stearns at the Town of Millbury’s Board of Appeals Meeting on March 13, 2024 related to the *Traffic Impact Study Update – Multifamily Residential Development – Located at 15-17 Rice Road Millbury, Massachusetts* traffic impact and access study (TIAS) dated February 2024 prepared for Whitney Street Home Builders and prepared by Ali R. Khorasani Associates (AK Associates).**

The comment was related to the discrepancies noted by the public commentor when comparing the crashes identified by AK Associates in the Accidents section of their most current submission of the *Traffic Impact Study Update*. The *Traffic Impact Study Update* identified two crashes within the study area from January 1, 2016 through January 1, 2024. Along with this data, AK Associates provided some narrative behind the individual crashes, and provided the intersection crash rate specific to the crash reported at the intersection of Providence Road (MA Route 122A) at Rice Road. The intersection crash rate was compared with MassDOT provided regional crash rates for similar intersections.

The public comment provided at the March 13, 2024 Board of Appeals meeting identified twelve crashes using MassDOT’s IMPACT Crash Query Tool; attributed to crashes within ¼ mile from the proposed site development driveway over the same period. Independent review performed by Stantec did indicate additional crashes within a quarter mile of the site drive.

Stantec reviewed MassDOT’s *Transportation Impact Assessment (TIA) Guidelines*, Town of Millbury’s Zoning Bylaws, and Town of Millbury’s Chapter 40B Rules and Regulations and found no established thresholds as to which crashes to include in the study. This is generally project specific determination based on project location and scale.

Reference: Comprehensive Permit Application (40B) 15-17 Rice Road Residential Development – Traffic Impact Study Update – February 2024 – Crash Data Comment

### **Comments & Recommendations**

Stantec reviewed both the information provided by AK Associates and by the public commentor, as well as verification utilizing MassDOT's IMPACT Crash Query Tool and offers the following comments to the Applicant's Engineer and recommendations to the Town:

- Stantec asks AK Associates to provide the search parameters resulted in the identification of the crashes reported in the *Traffic Impact Study Update* over the period reviewed compared to those identified in MassDOT's IMPACT Crash Query Tool utilized by the public commenter.
- Stantec asks AK Associates to review the data provided in MassDOT's IMPACT Crash Query Tool and as shared by the public commenter and consider the addition of the crashes identified.
- If it is determined additional crashes are to be included in this study after this review, Stantec recommends AK Associates add the narrative information for the additional crashes and recalculate the intersection crash rate at Providence Road (MA Route 122A) and Rice Road, followed by a comparison with MassDOT's crash rates of similar or regional roadways. Findings from review of the crash information should be used to inform the design of improvements to the intersection.
- Stantec recommends AK Associates provide the intersection crash rate of South Main Street at Rice Road and the roadway crash rate of Rice Road and provide comparison with MassDOT's crash rates of similar or regional roadways.
  - If the new reported crash rates in the study area are identified as higher than the average statewide crash rates of a similar intersection or classification, MassDOT's *Transportation Impact Assessment (TIA) Guidelines*, Section IV.A identifies: "*the proponent must assess options to mitigate the safety condition...irrespective of HSIP status or eligibility and identify potential remedies.*"
  - Stantec notes that the Town's project to reconstruct the intersection of South Main Street at Rice Road has occurred near the end of the period of crashes reviewed by AK Associates for the *Traffic Impact Study*. Historical crash data may not reflect the affect the reconstruction of the intersection may have on current and future crash rates, severity, or other safety-based metrics.