



By Electronic Mail: wentworthe@hingham-ma.gov

March 17, 2021

Dear Chairman Ellis and Members:

A.W. Perry, Inc. (“AWP”) is an authorized agent for Casa Development Inc., 90 Industrial Park JV LLC, South Shore Industrial Park Trust and Perry South Shore LLC, all direct abutters to the property located at 100 Industrial Park Road. AWP has been closely following and participating in the public hearing process to date regarding Amazon’s “Last Mile” Distribution Facility at 100 Industrial Park Road, and has invested significant time, effort and resources into the review of the submittals, reports, plans and testimony to date.

AWP has been an active contributor to the Hingham community, and since our founding in 1884 has developed over \$256 million in properties in Hingham including the BRIO condominiums at Hingham Shipyard, Class A office buildings that are home to several of the town’s top employers (including Blue Cross Blue Shield, EMD Serono and South Shore Orthopedic), and properties in the South Shore Industrial Park which are home to many of Hingham’s leading industrial employers. We have been actively engaged with the Town over the last two annual Town Meeting cycles regarding future development master planning and potential projects spanning the next 20 years that are directly aligned to Hingham Strategic Plan.

AWP is a relationship-driven real estate investment and services firm, and our portfolio of commercial, industrial, and residential properties has been strategically acquired, developed, and managed to serve the long-term needs of our valued clients and local communities. We note the numerous comment letters that have been submitted into the record, by AWP and multiple users of the industrial park outlining significant concerns. Unfortunately, the applicant’s proposal and plan revisions have failed to address the expressed concerns in any meaningful manner.

We have been surprised by the short-sighted and short-funded mitigation offered by the applicant, as they fail to meet the standards of mitigation required for the proposed use.

While each project presents its own challenges, we ask that the Board take note of the stark contrast between the mitigation offered by the applicant as part of the Hingham permitting, and the mitigation agreed to in connection with the 145,000 s.f. Amazon “Last Mile” distribution center under construction on the Kingston/Plymouth line. That project resulted in tangible mitigation, including required road improvements, the construction of sidewalks, intersection improvements, signalization and other infrastructure mitigation.¹ It is imperative that the Hingham Planning Board require mitigation commensurate to the scope of the proposed project and resulting impacts. The current plans, as revised, fall far short of that standard.

In an attempt to facilitate a cooperative dialogue, AWP developed proposed mitigation layouts that were presented to Amazon representatives for consideration. To date, Amazon has not responded to AWP. AWP now has limited options but to advocate on behalf of itself, the businesses in our Park and concerned town residents to appeal to the Planning Board to consider the attached proposed mitigation measures intended to minimize resulting impacts should the Board vote to issue a conditioned approval of the application. AWP is OPPOSED to the issuance of permits related to the proposed “Last Mile” project without enforceable conditions or a formal commitment from Amazon to invest in meaningful and impactful infrastructure improvements within South Shore Park, including:

- 1. Extend the striping and roadway width on the Pond Park Rd two lane approach to Derby St. from the existing 150’ to at least 250’.** While not eliminating the risk, this will reduce impact of vehicle queues from one lane

¹ See <https://www.wickedlocal.com/story/kingston-reporter/2021/03/13/amazon-builds-contributions/4639992001/>

(i.e. left turn onto Derby St.) blocking the ability of vehicles to access the other lane (i.e. right turn onto Derby St.). The daily peak period of release of vans from Amazon is between 10:30-11:30AM, and consumes up to 65% of left-turn capacity. When combined with existing South Shore Industrial Park traffic, this results in an up to 70% increase in queue length and commensurate delays. The applicant's traffic data modeling used the existing peak traffic period (12:00-1:00PM) within the park for their analysis. However, given the extraordinarily high volume of traffic during Amazon's 10:30-11:30AM platoon release time (described by Jessica Schumer of Amazon as "a parade of vans"), we suggest that a new day-time "peak hour" will be created and that this is the proper peak window to use. Additionally, the applicant's model relies upon incorrect traffic light timing assumptions (i.e. permitted right turn on red, which is clearly prohibited and no adjustment for longer van length) resulting in erroneous conclusions. When these errors are corrected for, there is model evidence that the business disruption issues raised repeatedly by concerned owners and tenants, and dismissed by applicant, are indeed legitimate.

- 2. Improve the "90-degree turn" on Industrial Park Road by increasing the centerline radius and improving the roadway cross section to Town requirements for a Major Street (i.e. 40' of pavement and sidewalk).** This dangerous curve has been cited in numerous submissions, was noted by Police Chief Olsson (Ret.) at public hearing, and the Town made a 1979 Right of Way Taking from 75 Industrial Park Road (AWP property) to allow for the future realignment of this curve. AWP has provided a proposed conceptual layout for the roadway realignment through the curve up to the Intersection with Commerce Road to the applicant/Amazon. That proposed layout improves the radius and incorporates both a right of way width and pavement width that comply with the Town of Hingham "major street" classification required for a street serving as the principal access to a business or industrial subdivision. The BL Offsite Roadway Improvements Plan (02/05/2021) proposes a limited shoulder expansion, designed to

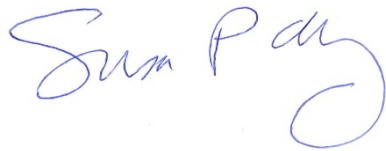
eliminate a truck lane crossing, and is insufficient to provide proper mitigation at the dangerous curve and its approach to Commerce Road. The AWP layout will greatly improve safety through the corner, improve sight distances and accommodate a dedicated left turn pocket onto Commerce Road which would mitigate Amazon's van and trailer traffic as well as emergency vehicle access issues.

- 3. Upgrade Commerce Road to meet Town requirements for a Major Street (i.e. 70-feet of Right-of-Way, 40-feet of pavement, sidewalks, etc.), to the rear of 100 Industrial Park Road, where it abuts AWP property.** Commerce Road is a private subdivision roadway that was never designed nor intended in its current layout for the intensity of use proposed. AWP has repeatedly offered to work with applicant/Amazon to accomplish this through the provision of land to accommodate a turn-around at the end and drainage that would provide public safety and transportation benefits. AWP provided a demonstrative sketch layout, which demonstrates compliance with Major Road cross-section and geometry requirements and provides improved and safer turning geometry to and from Industrial Park Road. The BL Offsite Roadway Improvements Plan (03/05/2021) proposes work at Commerce Road but falls far short of the layout required. The shortcomings of the design are perhaps highlighted best by the proposed 9'-wide gravel shoulder (now reduced from 11 to 2 vehicle lengths), required to prevent truck movement conflicts, short of a proper layout design. The anticipated impact to this segment of Commerce Road require the layout of the segment as a Major Street. This is not an opportunity to design to "bare minimum" standards. The Board must include this as a condition of approval. AWP again offers to facilitate such design and layout.

AWP finds itself in the position of advancing not only the interests of its entities, but of numerous businesses and owners in the Park and other concerned interests in the town. While the intended end-user, Amazon, is enjoying unprecedented growth in their business model and delivery logistics, there are well-documented

problems in numerous communities arising from their “Last Mile” operations. AWP’s experience and knowledge at the Park, together with accounts of Amazon’s activities in other communities underscores the need to require proper mitigation and strict conditions. AWP is committed to cooperating towards right of way and drainage requirements to assist the applicant and Amazon in providing the proper mitigation. Anything less is a missed opportunity to complete the proper mitigation, and we respectfully request that the Planning Board include the above conditions if it is inclined to issue Site Plan Review or Special Permit A3.

Sincerely,



Susan P. O’Day
President
A.W. Perry, Inc.