

**From:** [Heather Chew](#)  
**To:** [Jane Merrill](#)  
**Subject:** RE: Billerica Peer Review Request - 1&2 Federal St (DEP File No. 109-1614/ BBL-1614)  
**Date:** Thursday, January 15, 2026 3:25:19 PM

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**From:** Heather Chew <[hchew@billerica.gov](mailto:hchew@billerica.gov)>  
**Sent:** Friday, January 9, 2026 9:32 AM  
**To:** Danzing, Danielle (Leonor) <[Danielle.Danzing@kimley-horn.com](mailto:Danielle.Danzing@kimley-horn.com)>; Roche, Elizabeth <[Elizabeth.Roche@kimley-horn.com](mailto:Elizabeth.Roche@kimley-horn.com)>; Katherine Malgieri <[kmalgieri@billerica.gov](mailto:kmalgieri@billerica.gov)>  
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**Subject:** RE: Billerica Peer Review Request - 1&2 Federal St (DEP File No. 109-1614/ BBL-1614)

Hello Danielle,

Thank you for the thorough comments on the Traffic Impact Analysis.

Engineering Division offers the following comments on the review letters that were provided. The Engineering Division would be happy to meet with you to discuss this further.

**DPW Comments on Traffic Engineering Peer Review:**

1. Route 3 Interchange must be included in the assessment.
2. No comment (NC)
3. NC
4. NC
5. The traffic study was conducted while school was not in session. As a result, it does not capture school-related vehicular, pedestrian, and bicycle activity that materially affects peak-hour operations and safety. Accepted transportation planning practice requires analysis of typical school-day conditions. Without such data, the study underestimates congestion and safety impacts, and its conclusions are not reliable.
6. NC
7. NC
8. Since we will be requesting that Route 3 interchange be included in the assessment, we should also request timing plans for that signal?
9. Crash and Safety Analysis – Police details were required at this intersection during peak commuting hours prior to March 2020, with the cost borne by adjacent businesses. This

indicates that safety and operational issues existed at the intersection before the COVID-19 pandemic. However, the buildings served by this intersection have not been fully occupied since before the pandemic, and traffic conditions during this period are not representative of typical pre-COVID operations. The crash data presented in the assessment covers the years 2019–2023 and therefore does not accurately reflect historical crash experience under full occupancy conditions. According to MassDOT crash data, the intersection experienced four crashes per year in 2013 and 2014, and three crashes per year in 2015 through 2018. This earlier data more accurately represents normal operating conditions and should be considered in evaluating the intersection’s safety performance.

10. NC
11. NC
12. NC
13. Additionally, at least half of the building at 4 Federal Street was under construction/not occupied at the time of the study.
14. NC
15. NC
16. NC
17. NC
18. NC
19. NC
20. NC
21. NC
22. NC
23. NC
24. NC
25. NC
26. NC
27. NC
28. Despite the claim that no operational improvements are required because the new site will generate fewer trips than the current side does, DPW still recommends that a traffic signal be required as part of this redevelopment. At the very least, the Planning Board should consider requesting that a new traffic study be conducted once the buildings reach 85% occupancy and that the developer be responsible for funding the study and any improvements required as a result of the study.

“Applicant’s Off-Site Mitigation Commitment”:

- NC
- The bike path easements have been taken by the Town through the eminent domain process. The Property Owner has been awarded \$238,200 for the easements that were taken for

construction and operation of the Yankee Doodle Bike Path. The Property Owner has yet to claim the damages. The Town should encourage the Property Owner to consider donating the easements.

- **There are no sidewalks along the frontage of #2 Federal Street on either Federal Street or Concord Road. As a result, there is no pedestrian connectivity from the eastern side of Concord Road to the existing sidewalk on the western side. The Department of Public Works (DPW) recommends that the Applicant construct sidewalk along the frontage of the property on Federal Street and construct sidewalks along the property frontage on Concord Road. The warrants for a traffic signal at the intersection of Concord Road and Federal Street need to be re-evaluated based on our comments noted above. In addition, the Applicant should grant a public access easement through the property at #2 Federal Street to allow pedestrian and bicycle access from Federal Street to the bike path for public use.**
  - Include in report that proposed pavement markings and signage shall include appropriate crosswalk and signage for the crosswalk on Federal Street that connects the two properties.
  - NC
29. NC
30. Sheet C-107 of the plan set shows sidewalk connection from Federal Street to the bike path, but it does require clarification. It is currently shown as a dead end. They could show the bike path location and label it as to be constructed by others.
31. NC
32. NC
33. NC
34. NC
35. NC
36. Label the existing access easement with the legal reference and plan reference.
37. Please see third bullet above and shift comment as needed.
38. NC
39. NC
40. NC
41. For further discussion: KH agrees with TIA that a traffic signal is not warranted at this location. However, this traffic study was completed while buildings are not completely occupied. Please see Comments #9, 28 and third bullet in bold text above. The warrants for a traffic signal at the intersection of Concord Road and Federal Street need to be re-evaluated based on our comments noted above. If a signal is still not warranted, consider a recommendation as follows: *The Applicant shall complete a traffic study relative to the Federal Street/Concord Road intersection and including the adjacent signalized intersections within one year of the completion of the development. A traffic signal shall be installed at said intersection at the*

*expense of the Applicant if a signal is warranted. Cost shall include modifications to the adjacent signals as needed to coordinate the signals. The estimated cost of the traffic mitigation measures is \_\_\_\_\_. A bond shall be held in this amount until said study and installation is completed.*

42. NC

43. New comment: Crosswalk within Federal Street shall be per Town standard crosswalk detail.

Thank you,

**Heather Chew, PE** | Assistant Town Engineer | Town of Billerica | Department of Public Works | 365 Boston Road | Billerica, MA 01821 | Phone: 978-671-1300 | [hchew@billerica.gov](mailto:hchew@billerica.gov)