



Ms. Katherine Malgieri
Director of Planning & Community Development
Town of Billerica
365 Boston Road
Billerica, Massachusetts 01821

February 13, 2026

Ref. T1757.00

Re: Proposed Residential Development – 1 & 2 Federal Street – Billerica, Massachusetts
Response to Traffic Engineering Peer Review – Second Response

Dear Ms. Malgieri:

On behalf of the JLB Realty, LLC (the “Applicant”), TEC, Inc. (TEC) provided the following responses to the *Traffic Engineering Peer Review – Second Review*¹ memorandum prepared and issued by Kimley-Horn dated February 9, 2026 associated with the proposed residential development at 1 & 2 Federal Street (“the Project”).

Where actionable comments have resulted in a change to the application, an update to the Revised *Traffic Impact & Parking Assessment* (the “Revised TIPA”) has been provided under separate cover. Comments that were denoted as “CLEARED” have been removed from this letter to maintain focus and clarity on open peer review comments. The Kimley-Horn comments and second review comments are shown in **bold** and **bold italic** text with TEC’s response following in normal text with the active 2nd response in **blue text**. There individual responses are in *italics*.

Kimley-Horn Peer Review by Lisa Juan, P.E. – February 9, 2026

KM Comment 8: Upon resubmission, please provide signal timing plans for all signalized intersections included in the modelling. The relevant intersections include Middlesex Turnpike at Concord Road and the Route 3 interchange.

TEC Response: The signal timing / phasing at the intersection of Concord Road / Middlesex Turnpike has been projected in the TIPA based on modifications to the traffic signal proposed by others as off-site mitigation for the full build-out of the development located at #161 Concord Road. TEC utilized the TIA prepared by VAI² in May 2022 for the proposed traffic signal timing / phasing parameters in both the No-Build and Build conditions. There is currently no physical design plan denoting these traffic signal timing / phasing changes. Note that these modifications have been included within the TIPA per direction of the Town where the #161 Concord Road project is included as a Specific Development by Others.

Please refer to the response to Comment #1 addressing the US Route 3 interchange intersections.

¹ *Traffic Engineering Peer Review – Second Review - Proposed 1 & 2 Federal Street Redevelopment*; prepared by Kimley-Horn; Waltham, MA; February 9, 2026.

² *Transportation Impact Assessment; Proposed Lab/cGMP Building, 0 & 161 Concord Road, Billerica MA*; prepared by Vanasse and Associates, Inc.; Andover, MA; dated May 2022.

KM 2nd Comment: *Please provide a copy of the correspondence with the Town allowing this development to use modified signal timings. Additionally, please include the original copy of the approved TIPA detailing the proposed signal timing adjustments.*

TEC 2nd Response: The TIA prepared by VAI did not include a formal traffic signal plan depicting proposed changes to the traffic signal timing / phasing necessary for both off-site mitigation and the reuse of the dead-end approach at Concord Road / Middlesex Turnpike. A copy of the VAI TIA's relevant Synchro worksheets showing the proposed change in signal timing / phasing have been included in Attachment G of the Revised TIPA. Please note that the executed Certificate of Decision on the #161 Concord Road property dated August 2, 2022 does not specifically call out the traffic signal timing / phasing changes; however, the nature of the #161 Concord Road site directly providing a driveway into the signal's existing dead-end / spur approach necessitates this work regardless of any Condition of Approval. Note the following commitment was denoted on Page 31 of VAI's TIA, dated May 2022:

“As a follow-up to the initial activation and integration of the Project site driveway into the traffic signal system at the Concord Road / Middlesex Turnpike intersection, the traffic signal timing and phasing will be adjusted prior to the issuance of a Certificate of Occupancy for the Project. These improvements will be completed by the Project proponent subject to receipt of all necessary rights, permits and approvals.”

A copy of the Certificate of Decision is provided in Attachment G.

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KM Comment 9: **Crash and Safety Analysis – According to Town sources, 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. Please respond to the above.**

TEC Response: TEC’s opinion is that post-COVID conditions more accurately reflect today’s operational and safety conditions based on the change in “new normal” traffic flow conditions, updates to vehicle fleets, and driver tendencies.

Regardless, TEC did a cursory examination of the crash history defined by Kimley-Horn for the 2013 – 2019 period prior to COVID. During this timeframe, the intersection of Concord Road / Federal Street has experienced twenty (20) crashes (confirming Kimley-Horn’s comment), or an average of 2.86 crashes per year on average. This level of crashes over this time period would result in a crash rate (using the 2025 traffic volumes) of 0.30 crashes per million entering vehicles (MEV) which is considered less than the current statewide (0.57 per MEV) / district-wide (0.57 per MEV) average for unsignalized intersections and likely comparable past averages. With the limited crash history and the low crash rate, the historical intersection conditions do not specifically note a crash trend.

KM 2nd Comment: While we acknowledge TEC’s opinion regarding the ‘new normal’ of post-COVID traffic patterns, we do not agree that data from a period of significantly reduced building occupancy provides a sufficiently conservative baseline. TEC’s reference to a ‘cursory examination’ of the 2013-2019 period is noted; however, to ensure the public record reflects a safety evaluation, we request that the formal MassDOT Crash Rate Worksheets for those historical years be provided for historical context.

TEC 2nd Response: [TEC included the above-noted crash rate worksheet and spreadsheet breakdown of the crash history from 2013 to 2019 in Attachment E of the Revised TIPA, dated, January 24, 2026 \(page 95 & 96 of the PDF document. This has also been included in Attachment E of the update to the Revised TIPA which accompanies this letter.](#)

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KM Comment 13: It should be noted that the current office buildings on #1 Federal and #2 Federal are vacant, and therefore, no traffic demand for the existing conditions was captured during data collection. Because of this, TEC added the potential trips that could be generated from the existing office development and added them to the no build conditions. The result generated by difference between the office development trips and the proposed use trips was added to no-build conditions come about the build conditions. Please confirm this was the methodology and include it in the report. Additionally, at least half of the building at 4 Federal Street was under construction or unoccupied at the time of the study. The remaining buildings in the existing park appear to be fairly vacant as noted above. If true, the existing traffic counts would be further affected by this condition, resulting in the need to incorporate further adjustments for the future conditions to represent both the no-build and build conditions. Please address this matter and if appropriate, provide details on the additional adjustments.

TEC Response: The methodology utilized in the TIPA shows the full reoccupancy of both #1 and #2 Federal Street as general office uses during the No-Build condition as these existing buildings could be reoccupied with no permitting in a relatively short timeframe. These trip generations projections were not included in the Build condition. The Build condition only includes trip generation from the #1 and #2 Federal Street parcels that are generated as the proposed residential uses.

The Applicant has coordinated with the several other properties along Federal Street as to the vacancy level in July 2025 when the TIPA traffic counts were collected. The following information was provided:

- #3 Federal Street - ±80% occupied or ±18,000 SF vacant
- #4 Federal Street – No longer serves as office use, but a religious assembly building (Onnuri Mission Alliance) land use, with very minimal draw of traffic volumes during peak hour conditions. This location was under construction in July 2025 (39,888 SF). Current use does not necessitate traffic volume projections based on limited church traffic draw during peak hour conditions upon occupancy following construction.
- #5 Federal Street- ±100% occupied
- #8 Federal Street- ±100% occupied

Assuming full reoccupancy of ±18,000 SF vacant office space at #3 Federal Street, this space may generate up to 27 additional weekday morning peak hour trips (24 entering and 3 exiting) and 26 additional weekday evening peak hour trips (4 entering and 22 exiting). This level of additional traffic is generally negligible and would not significantly change the results of the capacity and queue analysis documented in the original TIPA. Additionally, modifications to the capacity and queue analysis would equally affect both the No-Build and Build conditions and therefore will not change the considerations of the proposed redevelopment. Please note that any additional traffic along Federal Street from this reoccupancy, or a full 57,888 SF reoccupancy (with office at #4 Federal Street as opposed to the existing religious assembly use) still does not trigger thresholds for traffic signal warrants at the intersection of Concord Road / Federal Street.

KM 2nd Comment: *While K-H acknowledges TEC’s assertion that the additional trips from #3 and #4 Federal Street are statistically minimal, we maintain that their formal inclusion in the capacity, queuing, and signal warrant would have been appropriate. Our primary concern is the vehicle queuing extending back along Federal Street from the Concord Road at the Federal Street intersection into the proposed site driveway. Even a small increase in trips from neighbouring parcels can exacerbate queues during peak hours. However, considering TEC’s response above and conclusion that*

these volumes would not trigger a warrant even under a full occupancy office scenario, we accept the response provided.

It is unclear whether these trips were added, at what point they were added, how many, etc. Please clarify this and make sure it is well documented in the report.

TEC 2nd Response: As KH has noted, TEC did not include these additional reoccupancy trips associated with #3 & #4 Federal Street in the revised capacity and queue analyses; however, TEC did include them in a revised traffic signal warrant analysis. For the purpose of comment close out, TEC has revised the capacity and queue analysis within the update to the Revised TIP A, which accompanies this letter, to include the additional traffic assuming the full reoccupancy of ±18,000 SF vacant office space at #3 Federal Street. These volumes (27 additional weekday morning peak hour trips and 26 additional weekday evening peak hour trips, as noted above) were included in both the No-Build and Build Conditions of the revised capacity and queue analyses.

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KM Comment 15: Please revise Figure I-1, Trip Distribution, and Table 6 - Trip Distribution Summary, as the trip distribution percentages do not match. For example, Table 6 shows 70% to/from the south on Concord Road, which is different from Figure I-1.

TEC Response: Figure I-1 (renamed to J-1) has been updated to be consistent with Table 6 and is provided in Attachment J of the Revised TIP A.

KM 2nd Comment: Comment not addressed. The traffic from Concord south shows as 65% in Figure J-1, while the trip distribution summary shows this distribution as 70%. Similar discrepancies exist for traffic coming from/to Middlesex Turnpike to the east. Please revise.

TEC 2nd Response: It is meant to be 70%. The error noted is typographic and nature and does not affect the data and analysis. The update to the Revised TIP A, which accompanies this letter, has been corrected. Note that the analyses have been changed for other reasons such as the additional eleven (11) residential units and the incorporation of the reoccupancy trips at #3 Federal Street.

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KM Comment 17: Please share the trip distribution used for reoccupied office space site trips. Attachment J includes tables for Billerica residential and office trip patterns—was this information included intentionally?

TEC Response: The TIP A included two (2) separate trip distribution gravity models based on US Census Journey-to-Work “OnTheMap” data. This includes an office specific distribution utilized for projecting the reoccupancy of the office space for the No-

Build condition and a residential specific trip distribution utilized for projecting the proposed redevelopment in the Build condition.

KM 2nd Comment: *Comment not addressed. Please include a figure and a description of the distributions assumed when evaluating the reoccupation of the office park in the report. It is difficult to arrive at the Build-Out conditions without all the relevant information.*

TEC 2nd Response: All trip distribution gravity models and traffic networks showing the percentages of distribution are provided in Attachment J of the update to the Revised TIPAs, which accompanies this letter. Traffic networks for the site reoccupancy are depicted in Figure 3 and for the #3 Federal Street reoccupancy are also depicted in Figures G-1 and G-2 (Attachment G). Text and tables for this information have also been added to the update to the Revised TIPAs, which accompanies this letter.

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KM Comment 24: As part of the Intersection Capacity and Queue Analysis Summary (Table 10), please provide the turn bay lengths as a column to determine whether the projected queues exceed the existing link capacity.

TEC Response: Comment acknowledged. Turn bay lengths are added to the Revised TIPAs.

KM 2nd Comment: *Turn bay lengths have been provided as part of the report. It should be noted that the queue at the westbound left movement at Middlesex Turnpike at Concord Road exceeds the turn bay at every condition. Is there any mitigation that was considered here to alleviate the impact?*

TEC 2nd Response: Table 12 of the update to the Revised TIAs, which accompanies this letter, denotes a No-Build average / 95th percentile queue along the Middlesex Turnpike WB left-turn lane of 66 feet / 293 feet during the weekday morning peak hour and 260 / 1,056 feet during the weekday evening peak hour. For the Build condition, the average / 95th percentile queue along the Middlesex Turnpike WB left-turn lane of 61 feet / 285 feet during the weekday morning peak hour and 549 / 1,082 feet during the weekday evening peak hour. The subject redevelopment project reduces the queue in the weekday morning peak hour and potentially adds less than a single vehicle of queue length to only the 95th percentile queue during the weekday evening peak hour. The subject project therefore has no noticeable impact on the length of queue in this lane. Whereas the project has effectively no impact, the Applicant is not proposing to change this lane geometry.

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KM Comment 30: The Town generally requires sidewalks along all property frontages, in this case, both Concord Road and Federal Street. There are no sidewalks currently or proposed along the frontage of #2 Federal Street on either Federal Street or Concord Road. As a result, there is no pedestrian connectivity between the eastern and western sidewalks. It is recommended to construct sidewalk along the frontage, unless a relief is requested due to site constraints. The warrants for the traffic signal at the intersection of Concord Road and Federal Street should 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.

TEC Response: The Project proposes to provide a direct connection from the property at #2 Federal Street to the to-be-built Yankee Doodle Bike Path, which connects to the signalized intersection of Concord Road / Middlesex Turnpike and includes an exclusive pedestrian phase to cross Concord Road and the crosswalk on the SB side of Concord Road. In addition, the Applicant will provide a painted crosswalk with appropriate traffic signs across Federal Street to allow residents of #1 Federal Street to access the Yankee Doodle Bike Path via the internal sidewalk network.

There is no requirement for a sidewalk along Concord Road in the Town Bylaws or Zoning Ordinance. There is already a sidewalk on the SB side of Concord Road providing pedestrian access to Billerica Center and the west side of US Route 3 and as provided on the Property residents can safely get from #1 & #2 Federal Street to this sidewalk via the Bike Path and crosswalk at the intersection of Concord Road / Middlesex Turnpike.

Furthermore, a sidewalk along the NB side of Concord Road for the 1,200 feet of site frontage is most likely not feasible based on the following challenges:

- The construction of sidewalk north of Federal Street would require significant impact to wetland resource areas including the need for retaining walls, relocated guardrail, and/or grading impacts into the delineated wetland. The Applicant considers this an unnecessary impact to environmental resource areas given the physical connection to the Yankee Doodle Bike Path already provided on-site.
- In the absence of a traffic signal, the Applicant and TEC do not believe a crosswalk adjacent to Federal Street across four (4) higher speed arterial lanes of Concord Road would increase the safety of pedestrians given the close-by signalized crossing at Middlesex Turnpike which sits only ±400-feet from the physical connection to the Yankee Doodle Bike Path on-site.

For further comment response as to traffic signal warranting conditions, please refer to the response to KM Comment #43.

A&M Response: *2 Federal Street has no existing sidewalk along its frontage, 1 Federal Street does have an existing sidewalk along its frontage on Federal Street that ends with an ADA ramp at the intersection of Concord Road, and there is an existing sidewalk on the opposite or north side of Concord Road. We note there are no existing crosswalks on Federal Street or across Concord Road. The topography along the Concord Road does not provide the opportunity for a sidewalk along this frontage without encroaching within the buffer zone and bordering vegetated wetland that is onsite at 2 Federal Street.*

The proposed site plans create connectivity between the two residential structures (across Federal Street) and to the proposed Yankee Doodle Bike Path which in turn provides access to Concord Road.

KM 2nd Comment: *Comment not fully addressed. Kimley-Horn understands the impacts that frontage sidewalk would have along Concord Road, however, Federal Street does not have the same environmental impacts that Concord Road does. It is our recommendation that a sidewalk be installed along Federal Street.*

Regarding the internal sidewalk connecting the site to the planned bike path, the Applicant is expected to grant a public access easement through the property at #2 Federal Street. This easement would provide pedestrian and bicycle access from Federal Street to the bike path for public use. Please confirm that this sidewalk will be available for public use. Additionally, please highlight the pedestrian amenities and how people can walk safely from various origins and destinations.

TEC 2nd Response: *In addition to the Applicants initial response, a public sidewalk is provided along the southerly side of Federal Street. The Applicant noted at the Billerica Planning Board hearing on February 9, 2026 that they have committed to the installation of a Rectangular Rapid Flashing Beacon (RRFB) at the proposed crosswalk between #1 & #2 Federal Street to activate connectivity between the existing sidewalk and the site's internal sidewalk network to access the Yankee Doodle Bike Path.*

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KM Comment 31: *The Applicant plans to join a Travel Demand Management (TDM) Program to promote public transit. The Middlesex 3 TMA should be considered to fulfil this commitment.*

TEC Response: *Consideration acknowledged.*

KM 2nd Comment: *Formal coordination with the TMA should be established as a condition of the TDM plan to ensure the proposed transit-related mitigation is effectively implemented.*

TEC 2nd Response: The Applicant noted at the Billerica Planning Board hearing on February 9, 2026 that they have committed to working with the local TMA, as well as the Lowell Regional Transit Authority (LRTA) to seek bus connectivity to the site. These discussions are ongoing.

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KM Comment 32: 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. Please identify the bike path location and label it to be constructed by others. Please clarify the construction timeline and whether this sidewalk will be accessible to the public.

TEC Response: Construction of the project and sidewalk to the Yankee Doodle Bike Path are expected to be complete by Summer of 2029. #4 & #8 Federal Street could have their own direct access to the Yankee Doodle Bike Path (given similar easement through their properties). The Applicant is open to having discussions with #3 & #5 Federal Street to see if their daytime employees would use the bike path.

A&M Response: *The site development drawings have been revised to indicate that construction of the bike path is “by others”. Access for the residents of the project will be adjacent to the detached garage as shown on the plans. The connectivity will be coordinated between contractors as the project proceeds.*

KM 2nd Comment: **Comment not fully addressed. Sidewalk connection from the site is shown more clearly in site plan (C-105), and labeling has been applied.**

Regarding the internal sidewalk connecting the site to the planned bike path, the Applicant is expected to grant a full public access easement through the property at #2 Federal Street. This easement would provide pedestrian and bicycle access from Federal Street to the bike path for public use. Please confirm that this sidewalk would be available for public use, not just limited to #3 and #5 Federal Street.

TEC 2nd Response: Please refer to the Applicant’s initial response and the 2nd response to KM Comment #30.

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Comment 38: It is mentioned as part of the report that joint access will be provided at the easterly driveway. Is there a cross-easement agreement between the two properties for #2 Federal St or a written agreement to understand joint access and parking? Please label the existing access easement with the legal reference and plan reference. If it does not exist, access to the residential parking along the south side of the building (#2 Federal Street) is not guarantee that could affect the development. Please provide proof of this cross-easement agreement.

TEC Response: The TIPA denotes that both #1 Federal Street and #2 Federal Street share cross-access capabilities with neighboring #3 Federal Street and #4 Federal Street, respectively. It is the intent of the project to eliminate the cross-access capabilities at #1 Federal Street (with #3 Federal Street) while maintaining the existing condition on the #2 Federal Street parcel. The existing cross-access capabilities are documented through the Middlesex County North Registry of Deeds as a “25-FT All Purpose Easement” through the most recent plans for #4 Federal Street (Book 144, Page 43) and for #3 Federal Street (Book 144, Page 26).

A&M Response: *The easterly driveway is shared under an easement recorded at the Registry of Deeds at Book 6854 Page 267 as attached hereto. The easement grants the rights for vehicular and pedestrian passage as well as utility installation and maintenance. It does not incorporate any shared parking requirements between the properties. As proposed, the development at 2 Federal Street is provided with 299 spaces in conformance with zoning with no reliance on any shared parking. The easement legal references have been added to the revised Existing Conditions plan as requested.*

KM 2nd Comment: *The attachment, demonstrating the recorded easement, is missing. Please include it as part of the attachment of the report.*

TEC 2nd Response: [The referenced recorded easements documents have been included in Attachment N of the update to the Revised TIPA.](#)

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KM Comment 39: **The Town of Billerica requires sidewalk facilities along site frontages. As a result, it is recommended that the Applicant construct sidewalk along the frontage of the property on Federal Street and construct sidewalks along the property on Concord Road.**

TEC Response: There is no requirement for a sidewalk along Concord Road in the Town Bylaws or Zoning Ordinance. Please refer to the response to KM Comment #30.

KM 2nd Comment: *Comment not fully addressed. Kimley-Horn understands the impacts that frontage sidewalk would have along Concord Road, however, Federal Street does not have the same environmental impacts that Concord Road does. It is our recommendation that sidewalk be installed along Federal Street.*

TEC 2nd Response: [Please refer to the Applicant’s initial response and the 2nd response to KM Comment #30.](#)

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KM Comment 40: **Please provide the overall site plan (1-2 pages) as part of the appendix or as a figure for review convenience upon resubmittal.**

TEC Response: The Site Plan package may be modified following submission of the Revised TIPA. As a result, TEC typically does not include Site Plan sheets, unless specific to a traffic related item, within traffic assessment documents in order to avoid potential confusion with future revisions that may be publicly posted. Note the site plan, as revised, is included as part of the overall site plan review submission package.

KM 2nd Comment: Comment not addressed. K-H acknowledges TEC's concern regarding version control. However, for the convenience of peer reviewers, an overall site plan should be included in the TIPA attachment. To address the risk of 'potential confusion' a footnote or watermark may be added to the sheet. Unless the site undergoes a major redesign that fundamentally changes trip distribution or access points, the TIPA remains a record of the project's impact at the time of study.

TEC 2nd Response: [The copy of the general site plan has been included in Attachment O of the update to the Revised TIPA.](#)

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KM Comment 43: KH agrees with TIA that a traffic signal is not warranted at this location. However, this traffic study was completed while buildings were not completely occupied. Please see Comments #9, 28, and #29. The warrants for a traffic signal at the intersection of Concord Road at Federal Street need to be re-evaluated based on our comments noted above. If a signal is still not warranted based on the estimated conditions, consider a recommendation as follows: The Applicant shall complete a traffic study relative to the Federal Street/Concord Road intersection, including the adjacent signalized intersections, within one year of the completion and full occupancy 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.

TEC Response: Please refer to the response to KM Comment #13. Upon revisions to the traffic signal warrant calculations with additional reoccupancy by others along Federal Street (#3 & #4 Federal Street all as office even though #4 Federal Street is currently occupied by religious assembly use), a traffic signal is still not warranted as part of the project. In order to meet this warrant condition, with the reoccupancy by others noted above, the industry standard Institute of Transportation Engineers (ITE) model conditions would require up to seventy-seven (77) additional multi-family residential units on Federal Street, or a 30% increase in the proposed uses on-site.

Whereas proposed traffic levels are not generally close to warranting thresholds identified in the *Manual on Uniform Traffic Control Devices for Streets and Highways* (MUTCD), conditions to meet warrants are likely to be related to the

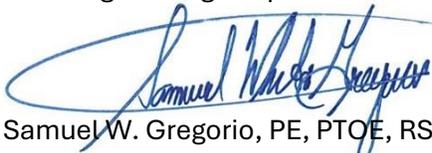
other uses, reoccupancies, and/or redevelopment of parcels along Federal Street. Given that signal warrants are not met under existing (including potential re-occupancy of 1&2 Federal) or the future conditions under the industry standard ITE model conditions attributable to the Project, any future post-occupancy traffic studies or future signal installation obligations would be unrelated to demonstrated impacts from this project and therefore not warranted.

KM 2nd Comment: *It is unclear where the re-occupancy takes place in the TIPA, is this only being considered for the signal warrant? Show the appropriate trip generation table, distribution, trips, and build out considering the reoccupancy of the adjacent office space. However, based on the clarification regarding the additional reoccupancy, a traffic signal does not meet the warrants.*

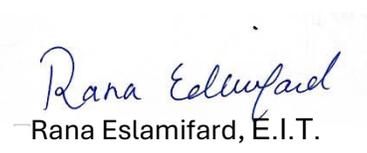
TEC 2nd Response: Please refer to TEC's 2nd Response to Comment #13. Additional information as to the scope of occupancy trips at #3 & #4 Federal Street has been added to the updated version of the Revised TIAS. Calculations sheets have been included in Attachment G. Note that the change in unit count and other addition of other comments has slightly changed the original response. In order to meet this warrant condition, with the reoccupancy by others noted above, the industry standard ITE model conditions would require up to forty-six (46) additional multi-family residential units on Federal Street, or a 17% increase in the proposed uses on-site.

If you have any questions regarding the Applicant's 2nd responses, please do not hesitate to contact us at 978-794-1792.

Sincerely,
TEC, Inc.
"The Engineering Corporation"



Samuel W. Gregorio, PE, PTOE, RSP₁
Senior Project Manager – Transportation (Traffic)



Rana Eslamifard, E.I.T.
Transportation Planner/Designer II