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CAPE COD  
COMMISSION

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**By Electronic Mail**

May 31, 2017

Mr. Paul Lagg  
Eastham Town Planner  
2500 State Highway  
Eastham, Mass. 02642

Re: Technical Assistance Request  
Proposed Dollar General  
4615 State Highway, Eastham

Dear Paul:

To assist with the town's permitting review of the above-referenced project, you requested technical assistance from Cape Cod Commission staff by letter May 10, 2017 on behalf of the town's zoning and planning boards.

The following are staff's preliminary comments on the initial permitting filings, which are relatively general in nature and focus on community character and transportation issues. Staff would be happy to provide additional and more detailed comment to support the boards as they continue their reviews.

In sum, as provided in greater detail below, Commission staff recommends that the project be more appropriately sited and designed to meet regional and local community character standards. The Town should also require the applicant to prepare and submit for permitting review a traffic impact study.

Cape Cod Commission staff are available and happy to discuss these comments.

**COMMUNITY CHARACTER/ DESIGN**

For several years, the town of Eastham has made efforts to guide the character of North Eastham center toward more pedestrian-oriented development. The design of the proposed new development is not consistent with the town's goal to transition the area from strip style development to pedestrian-oriented village style development. To advance the town's goals, improvements to the proposed building setback, parking location, building scale, landscaping and pedestrian amenities should all be considered.

The Cape Cod Regional Policy Plan (RPP) and regional design guidelines do not support the creation of single-use linear roadside 'strip' development, such as is proposed. The project is also inconsistent with other RPP community character design standards.

The applicant is proposing to construct a 9,100 s.f. Dollar General retail store on an approximately 2.8-acre site. The project site is located on U.S. Route 6, a regional roadway. The site is currently undeveloped and wooded with relatively flat topography.

The project includes a single rectangular building with parking in front and to the side of the building, with a large fenced infiltration basin for stormwater runoff from the building roof and parking areas. A walkway is proposed from the front of the building to the Route 6 frontage but does not connect to other walkways and no crosswalk is provided. Proposed landscaping is limited to small isolated shrub beds. The lot will be almost completely cleared of vegetation for the proposed development and stormwater drainage basins, and will be highly visible from this regional roadway.

The proposed project is located outside of the core area identified in the town's North Eastham Village Center concept. Smaller structures were envisioned for this area, but the proposed building is much larger than other buildings fronting the roadway. Other recently developed commercial structures in the vicinity have a residential scale and form, and most have a front façade width of 25 to 35 feet. The proposed building façade is roughly 70 feet wide and should be broken into smaller components that incorporate variation in the roofline and façade line consistent with traditional structures in the region.

The proposed site design, with the building set far back from the road and the parking located prominently in front, does not follow traditional regional development patterns or good design principles. The parking should be placed to the side or rear of the site where it is less visible and can be buffered by landscaping. The building should be moved closer to the front of the site, and improved landscaping and pedestrian amenities should be incorporated into the front yard area. The proposed site plan would eliminate nearly all of the existing wooded lot and does not include sufficient landscaping to help screen the building from the roadway. Proposed stormwater management does not address best management practices including Low Impact Development infiltration of stormwater. Roof and parking lot runoff is piped directly to a large infiltration basin that will be fenced and highly visible from the roadway.

The RPP does support reducing impervious parking coverage, and staff supports the applicant's special permit request seeking relief from the town zoning by-law's required parking count. However, staff recommends that the proposed parking areas should include landscaping to break up the parking fields.

## **TRANSPORTATION**

### **A. Trip Generation**

A memorandum dated April 28, 2017, prepared by Bohler Engineering, ("traffic memo") presents a trip generation analysis of the proposed redevelopment. As presented in the traffic memo, trip generation estimates were developed based on trip generation data in *Institute of Transportation Engineers' (ITE) Trip Generation Manual, 9th Edition*, for ITE Land Use Code (LUC) 814 (Variety Store). This manual describes a Variety Store as "a retail store that sells a broad range of inexpensive items often at a single price." The manual further notes that these

stores “are typically referred to as “dollar stores.”” Commission transportation staff agrees with the characterization of the proposed use.

The traffic memo estimates the proposed project will generate 29 weekday 7–9 AM peak hour trips and 52 weekday 4–6 PM peak hour trips. Commission transportation staff, based on ITE data for a 9,100 square foot Variety Store, estimates that the proposed project will generate 35 weekday 7–9 AM peak hour trips and 62 weekday 4–6 PM peak hour trips. The estimates presented in the traffic memo appear to be approximately 17 percent less than would be expected based on ITE trip generation rates. It is unclear why the estimates do not appear to follow the trip generation analysis approach presented in the traffic memo.

The highest peak hour traffic generation for retail uses typically occurs during the Saturday midday peak hour period. Commission transportation staff suggests that an estimate of anticipated Saturday peak hour trip generation should be provided.

### **B. Traffic Impact**

The traffic memo notes the ITE recommends a traffic impact study be performed “*whenever an increase in trips in any peak hour is greater than 100 trips per hour.*” The traffic memo further suggests that the proposed development “*will not have a negative impact on the surrounding street network nor merit a full traffic impact study.*”

As the only major route through Eastham and to the Outer Cape towns, Route 6 experiences significant traffic volumes, particularly in the summer months. On an average summer weekday, 25,000–30,000 vehicle travel along Route 6 in the vicinity of the project site. These volumes, across four lanes, makes turning out of driveways particularly difficult on this section of roadway. The Applicant is currently proposing full access (left and right turns) in and out of the site driveway.

The intersection 600–700 feet south of the intersection, Route 6 at Brackett Road, has a well-documented crash history. The addition of any significant volume of traffic through this intersection warrants careful analysis.

Commission transportation staff suggests that, given the location of the proposed project, a traffic impact study is warranted to provide the Planning Board an analysis of the operational and safety analysis of site driveways and regional roadways and intersections impacted by the project. Commission transportation staff notes that, for projects reviewed by the Cape Cod Commission, such an analysis is roadway links and intersections impacted by 25 or more new peak hour trips.

Without an appropriately detailed traffic impact study, Commission transportation staff cannot provide further insight on the anticipated safety or operational impacts of this proposed project.

### **C. Site Design**

Commission transportation staff suggests that limiting the site to one curb cut and providing a safe pedestrian connection to the building follow good access management principles. Commission transportation staff suggests that the curb cut appears wider than necessary for the anticipated vehicles using the site. Excessive curb cut width negatively impacts the safety of pedestrians crossing the site driveway.

Given the existing safety issues on Route 6 and the proximity to the intersection with Brackett Road, consideration should be given to limiting site access to right-turn-out, right-turn-out only.

Commission transportation staff are also interested in the status of the paper road, labeled Wiley Lane, on the site plan. If the applicant has rights to access this paper road and there is a potential that future development may occur on the paper road, there should be consideration given to avoiding a situation where there are ultimately curb cuts to both the site and the paper road.

Sincerely,



Patty Daley  
Deputy Director

Cc: Project File  
Joy Brookshire, Cape Cod Commission Representative, Town of Eastham