

Testimony at CCC hearing on limited DRI of Springhill Suites hotel, 556 Main St., Falmouth
May 26, 2015

The area of the existing retail space in the building on the corner of Main street and Lantern lane (Antique Coop) appears in two places in the application to the Commission with different numbers in the two places, and in one place, different numbers in the two application versions which have been submitted. The smallest of these three numbers, 14,000 ft², is used to calculate compensation for lack of affordable housing in the plan due to the large percentage of substandard jobs generated. Of course, a small number is advantageous to the developer because it will cost him less.

The other area is used to compute traffic impact of the hotel, ie, the difference between the estimated trips per day from the hotel, estimated at 900 trips/day, and from the existing store. Instead of requiring traffic counts, the Commission allows estimates based on the area of the store and type of use.

The first application used 16,300 ft² as the actual retail space. The revised application added building storage space to the retail space to get 19,000 ft², an increase of 17%. The Commission's threshold for whether a proposed development qualifies for the less onerous "Limited Development of Regional Impact" review, or the more extensive review process, is 250 trips/day. In other words, if the new development generates less than 250 new trips/day, then it qualifies for the Limited Review – a much easier process. The prior presentation by the CCC regulatory staff member stated that the retail area used was 11,800 ft². There seems to be confusion as to what number was actually used.

Since the estimate of trip generation is based on square footage (not including storage) and type of use, this meant there were allegedly 720 trips generated by the 16,300 ft² per day version (we all know this is absurd, but that's a different matter). Apparently the 720 was a little too close to 900 for them so in the next version of the application they added the storage space (apparently against the rules) for a total of 19,000 ft². This gave them 840 trips per day (even more absurd). It's worth noting, though, that this same analysis projected a *decrease* of 71 cars during peak hours. That seems hard to believe.

I'd like to point out that, if the store is open 8 hours/day, this represents an average of 105 trips per hour. I'm sure the owners of the Antique Coop would be deliriously happy with this many customers but I don't believe it. Also, there is substantial disparity between retail areas used in various sections and versions of the application. I'm trying to trust the Commission but is anyone really reading these applications?

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