



# Northern Middlesex Council of Governments

Date: January 17, 2023

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Dunstable  
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Select Board, Town of Chelmsford  
C/O Town Manager's Office  
50 Billerica Road  
Second Floor  
Chelmsford MA 01824

Attention: Paul Cohen, Town Manager

Dear Paul,

Enclosed in this correspondence is a technical memorandum outlining the findings of a feasibility study of increased heavy vehicle traffic in North Chelmsford, particularly focusing on Ledge Road, Dunstable Road, Swain Road and Route 40 as part of the District Local Technical Assistance (DLTA) program.

This assessment reviews the current traffic conditions, summarizes meetings with the Towns of Chelmsford and Westford, as well as the Massachusetts Department of Transportation (MassDOT), and identifies potential solutions and barriers to those alternatives.

Please do not hesitate to contact us if there are any questions or comments on this memo.

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Andrew N. Deslaurier  
Chair

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Jennifer M. Raitt  
Executive Director

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40 Church Street  
Suite 200  
Lowell, MA  
01852-2686

TEL: (978) 454-8021

FAX: (978) 454-8023

[www.nmcog.org](http://www.nmcog.org)

Sincerely,

Justin Howard

Transportation Director

CC: Jennifer Raitt, Executive Director  
Shravanthi Gopalan Narayanan, Transportation Planner  
Chris Hayes, Housing and Economic Development Planner



## Northern Middlesex Council of Governments

### TECHNICAL MEMORANDUM

**Date:** January 17, 2023

**To:** Chelmsford Select Board

**From:** Northern Middlesex Council of Governments (NMCOG)

**Re:** Heavy Vehicle Traffic at Ledge Road in North Chelmsford – DLTA Route 40 Groton Road Study

## BACKGROUND

As part of the District Local Technical Assistance (DLTA) program request from Town of Chelmsford, the Northern Middlesex Council of Governments (NMCOG) contracted with the Town to assess the increases in heavy vehicle traffic on Ledge Road, Dunstable Road and Swain Road in North Chelmsford. Based on requests from the Town, Congresswoman Trahan’s office also contacted MassDOT District 4 in 2021 and NMCOG in early 2022 to inquire about options to mitigate the issue. NMCOG has been working with the Town since 2017, monitoring traffic in the area.

This assessment reviews the current traffic conditions, summarizes meetings with the Towns of Chelmsford and Westford, as well as the Massachusetts Department of Transportation (MassDOT), and identifies potential solutions and barriers to those alternatives.

## 1 EXISTING CONDITIONS

Newport Materials, W. J. Graves and Newport Aggregates (Newport Aggregates owns Newport Quarry) are the subject businesses located in Westford, near the town line of Chelmsford and Westford. These subject properties need access to Route 3 to deliver goods to surrounding areas.

W. J. Graves and Newport Aggregates are located at the end of Ledge Road, which is a local road located in the Town of Chelmsford. These two properties at the end of Ledge Road have no alternative access besides using local residential roadways such as Ledge Road, Dunstable Road and Swain Road to get to Route 3. Newport Aggregate is located on Commerce Way off of Route 40 in Westford. An internal road connects the Newport Quarry to Commerce Way. However, this road is currently not used to transport materials away from the properties.

The Westford Planning Board granted a special permit to Newport Materials, which consists of the asphalt plant, materials processing yard, and laboratory building. A condition of approval

for the asphalt plant was the limitation of 400 truck trips per day, which excludes internal trips between the subject property and other adjacent properties. However, this arises the question - how do we determine the maximum number of trucks permitted per day for residential streets like Ledge Road, Dunstable Road and Swain Road? Were the safety and health of residents, children, pedestrians and drivers living and travelling along these streets considered? The total number of allowed truck trips per day was decided to be 400, serving the purpose of maintaining the existing operations of the quarry. This special permit does not include truck traffic from other properties such as Granite State Concrete Quarry (to the west), W. J. Graves Quarry (to the north), and other adjoining properties in Chelmsford.

NMCOG awarded funding to the Town of Chelmsford to conduct a study to identify issues in the area through the region's DLTA program. Since that award, NMCOG has collected traffic volume data, adding to the database of volumes that the agency has collected for the Town over the past six years.

When the traffic volume is reviewed, it is noticed that heavy vehicle traffic has increased significantly on the surrounding roadways. A solution to the issue can be identified only by identifying the source of this excess truck traffic.

Ledge Road is public way to an extent but there is part of Ledge Road that becomes private way which ends at the quarries and aggregate plant. Since these businesses are in Westford and are pre-existing non-conforming businesses, it is beyond the Town of Chelmsford's right to restrict truck traffic without offering an alternative route. This is yet another challenge for the Town of Chelmsford.

## 2 CURRENT CONDITIONS OF THE ROADWAYS

Figure 1 highlights the roadways and the properties under discussion, including Ledge Road, Dunstable Road, Swain Road and Groton Road in North Chelmsford.

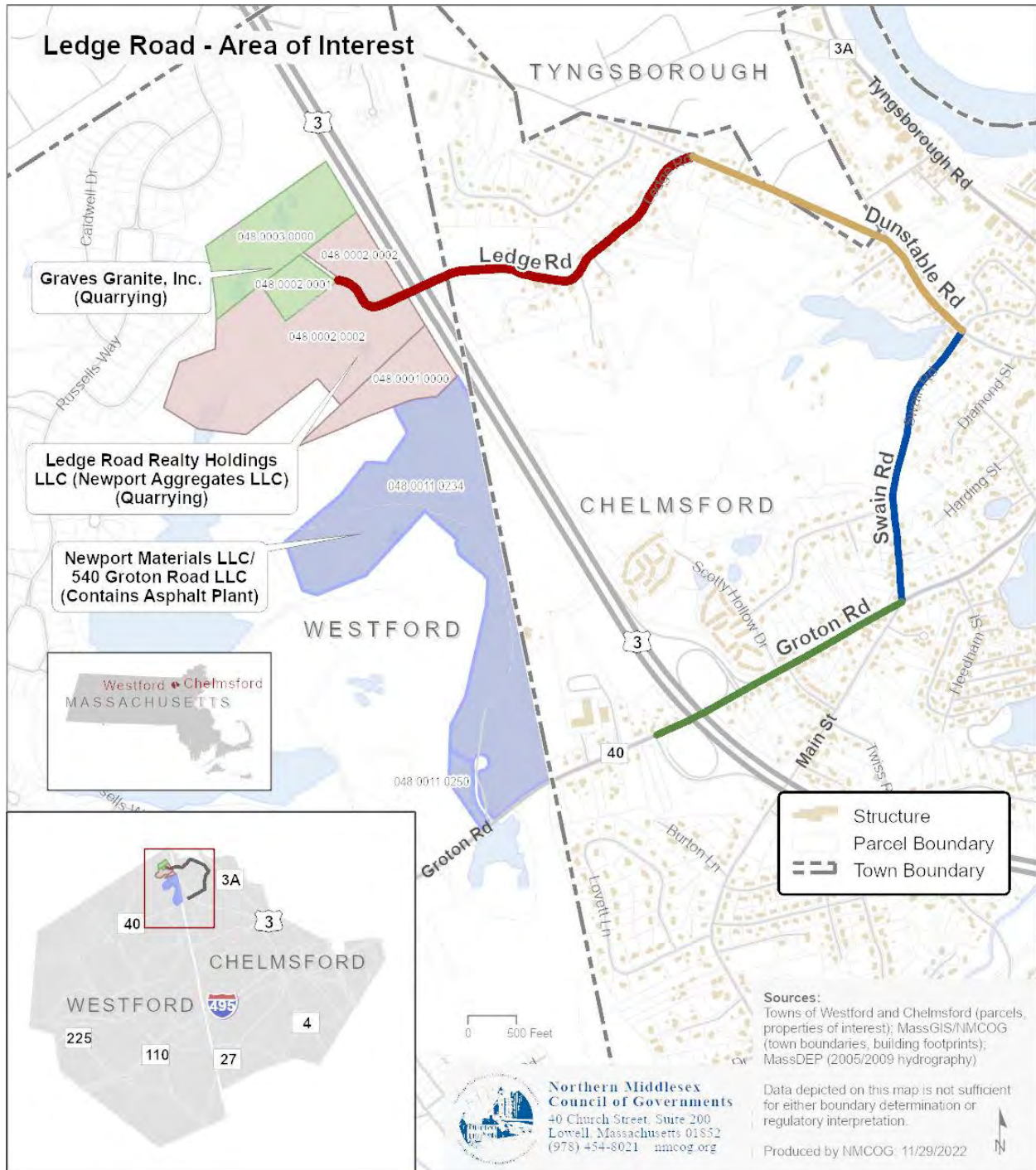


Figure 1 Map of roadways and properties.

Ledge Road is classified as a local road, with a speed limit of 20 mph; Dunstable Road is classified as a collector with a speed limit of 30 mph; Swain Road is a local road with a speed limit of 30 mph; and Groton Road is an arterial with a speed limit of 40 mph. Ledge Road, Dunstable Road, Swain Road and Groton Road are two-way roads with one travel lane on each direction. Ledge Road, Dunstable Road and Swain Road have no sidewalks or bicycle accommodations, while Groton Road has sidewalks on both sides between Swain Road and exit to Route 3.

### 3 CURRENT TRAFFIC CONDITIONS

Based on a request from the Town of Chelmsford in early 2017, NMCOG began monitoring truck volumes on Ledge Road. The table below summarizes Average Annual Daily Traffic (AADT) and truck percentages for various locations near Ledge Road between 2017 and 2022. Based on truck percentage data collected, we infer that there has been a significant increase in truck traffic over this time period.

*3.1 Summary of Average Annual Daily Traffic (AADT) and Truck Percentages by Traffic Count Location: 2017-2022.*

Location of Count	Date Range of Count	AADT	Truck %
Swain Road South of Dunstable Road	5/16/2017 - 5/18/2017	2,600	16.5
	9/11/2017 - 9/13/2017	2,600	6.0
	11/7/2018 - 11/11/2018	2,400	6.4
	5/13/2019 - 5/16/2019	2,590	8.4
	5/16/2022-5/20/2022	2,537	34.2
Swain Road North of Groton Road	11/7/2018 - 11/11/2018	2,400	5.9
	5/13/2019 - 5/16/2019	2,674	10
	5/16/2022-5/20/2022	2,596	28.8
Ledge Road South of Dunstable Road	5/9/2017 - 5/11/2017	350	13.7
	10/16/2017 - 10/18/2017	390	26.8
	12/19/2017 - 12/21/2017	340	19.4
	11/5/2018 - 11/12/2018	427	37.5
	5/6/2019 - 5/9/2019	433	56.9
	5/16/2022-5/20/2022	791	58.2
Dunstable Road East of Ledge Road	11/5/2018 - 11/12/2018	2,270	10.3
	5/6/2019 - 5/9/2019	2,451	9.8
	5/16/2022-5/20/2022	2,409	18.4
Dunstable Road West of Ledge Road	5/16/2022-5/20/2022	1,891	7.2
Rte 40 (Groton Road) East of Rte 3 NB	9/17/2018-9/20/2018	9,461	2.1
	9/14/2020-9/17/2020	7,615	9.5
	5/18/2021-5/21/2021	9,426	8.3
	5/16/2022-5/20/2022	8,860	17.6

### 3.2 SWAIN ROAD SOUTH OF DUNSTABLE ROAD

Swain Road South of Dunstable Road location was monitored in 2017, 2018, 2019 and 2022 at various intervals ranging from 3 days to 5 days. The truck percentage in May 2017 was 16.5%, which then reduced to 6% in September 2017. However, there has been an increase in the truck traffic after that and the latest data show that in May 2022, there were about 34.2% of total truck traffic (Figure 2).

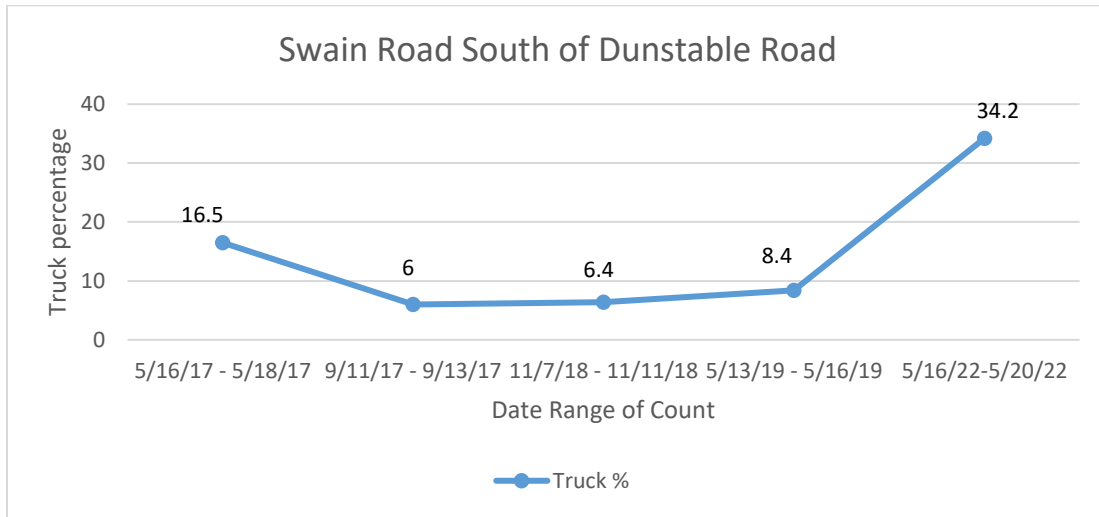


Figure 2 Graph of truck percentage at Swain Road South of Dunstable Road.

### 3.2 SWAIN ROAD NORTH OF GROTON ROAD

Swain Road North of Groton Road location was monitored in 2018, 2019 and 2022 at intervals of 4-5 days. The truck percentage in November 2018 was 5.9%, which then increased to 10% in May 2019. However, there is a steep increase in the truck traffic resulting in 28.8% in May 2022 (Figure 3).

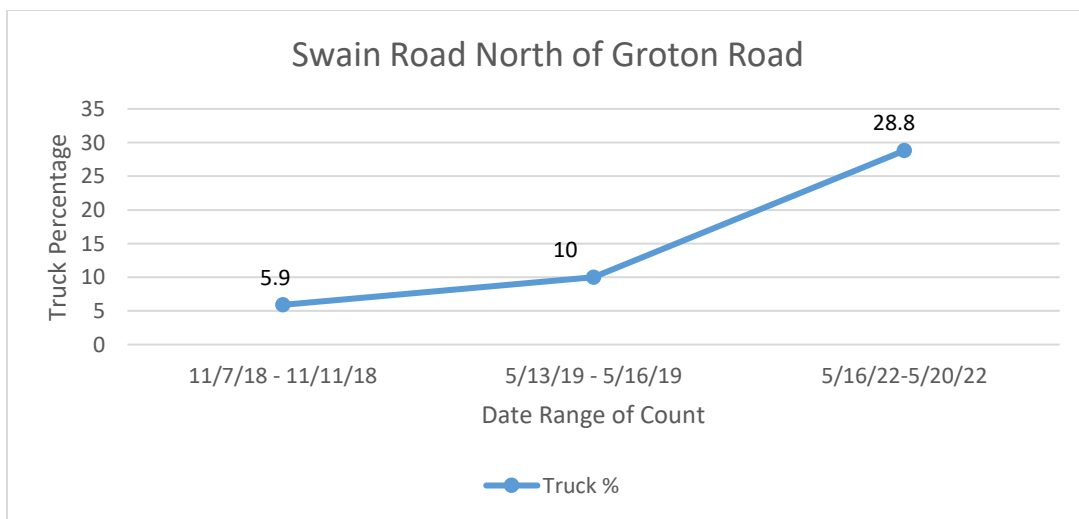


Figure 3 Graph of truck percentage at Swain Road North of Groton Road.

### 3.3 LEDGE ROAD SOUTH OF DUNSTABLE ROAD

Ledge Road South of Dunstable Road location was monitored in 2017, 2018, 2019 and 2022 at various intervals ranging from 3 days to 12 days. The truck percentage in May 2017 was 13.7%, which then increased to 26.8% in October 2017 which later reduced to 19.4% in December 2017. There has been a steady increase after that with about 37.5% in November 2018 and 56.9% in May 2019 and 58.2% in May 2022 (Figure 4).

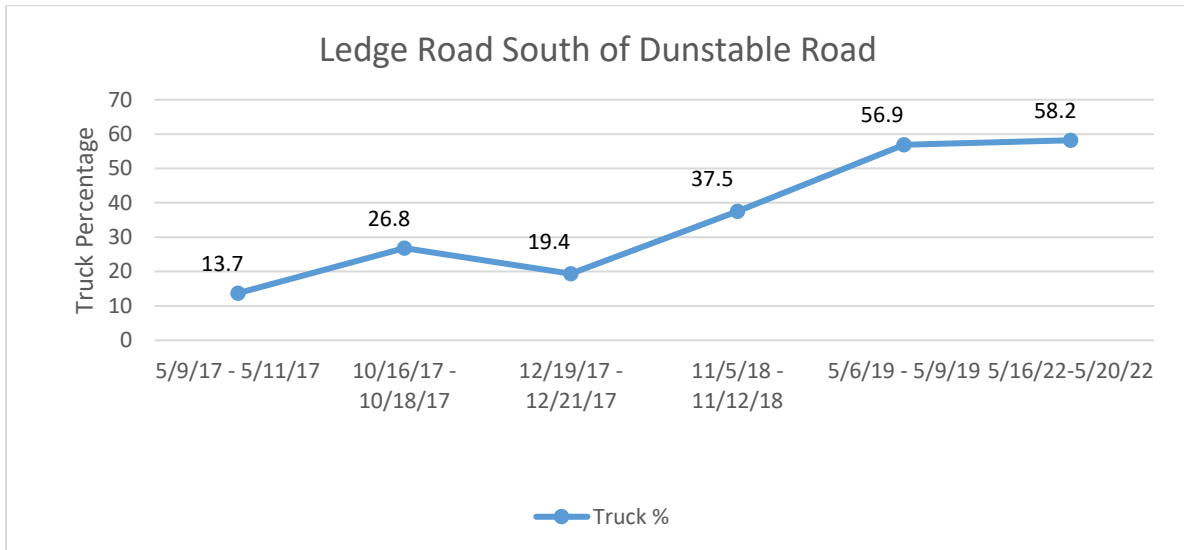


Figure 4 Graph of truck percentage at Ledge Road South of Dunstable Road.

### 3.4 DUNSTABLE ROAD EAST OF LEDGE ROAD

Dunstable Road East of Ledge Road location was monitored in 2018, 2019 and 2022 at various intervals ranging from 3-8 days. The truck percentage in November 2018 was 10.3%, which then reduced to 9.8% in May 2019. The latest data shows that in May 2022, there were about 18.4% of total truck traffic (Figure 5).

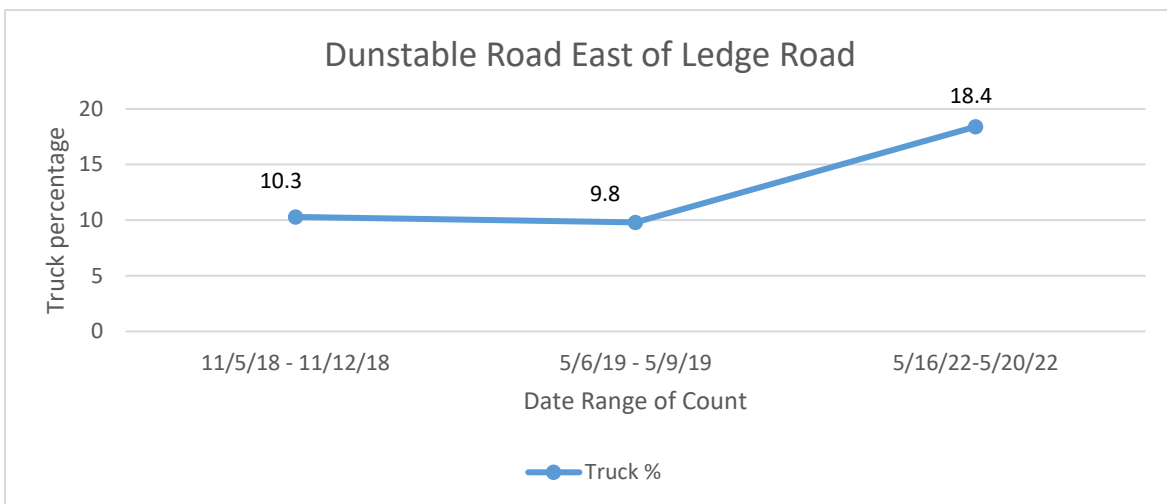


Figure 5 Graph of truck percentage at Dunstable Road East of Ledge Road.

### 3.5 DUNSTABLE ROAD WEST OF LEDGE ROAD

Dunstable Road West of Ledge Road location was monitored in May 2022 for about 5 days. The truck percentage in May 2022 was 7.2% (Figure 6).

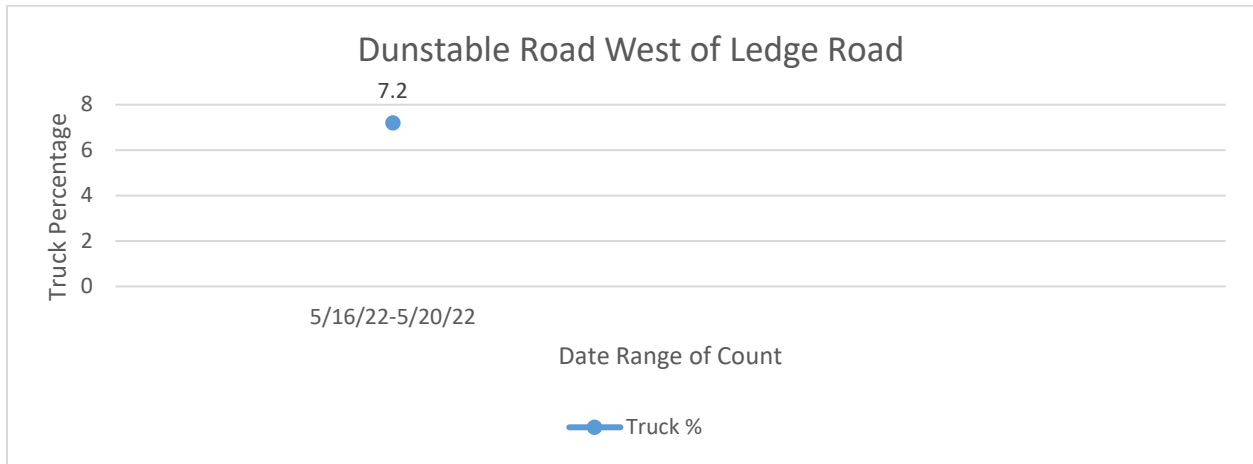


Figure 6 Graph of truck percentage at Dunstable Road West of Ledge Road.

### 3.6 ROUTE 40 EAST OF ROUTE 3 NB

Route 40 East of Route 3 NB location was monitored in 2018, 2020, 2021 and 2022 at various intervals. The truck percentage was 2.1% in September 2018, which increased to 9.5% in September 2020 and dropped to 8.3% in May 2021. The latest data shows that in May 2022, there were about 17.6% of total truck traffic (Figure 7).

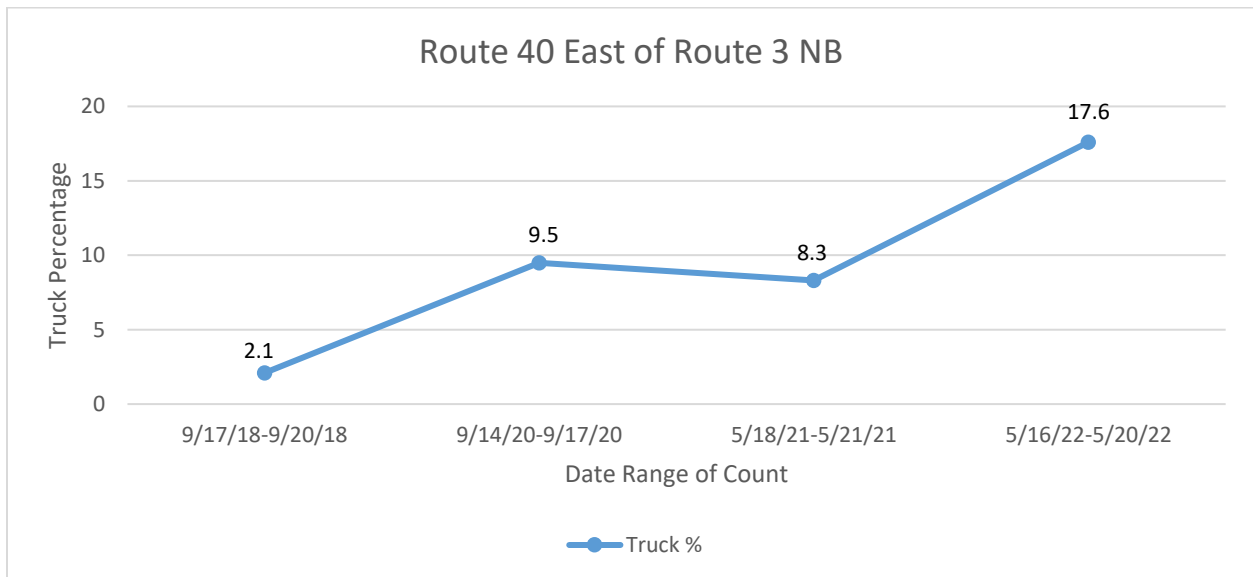


Figure 7 Graph of truck percentage at Route 40 East of Route 3 NB.



## 4 SUMMARY OF STAKEHOLDER MEETINGS

As part of this study, NMCOG staff met with various stakeholders discussing existing issues in the area and identifying potential options to mitigate the heavy traffic issue in North Chelmsford. The discussions were aimed on finding alternate solutions or alternative routes to reroute the truck traffic on Ledge Road and surrounding areas. Alternate solutions discussed in these meetings include an interchange at Route 3 and Ledge Road, rerouting the truck traffic through internal roads like Ward Way and Commerce Way, and implement restrictions on businesses that access Ledge Road. The barriers to these alternate solutions and other considerations are discussed in detail below.

### 4.1 NMCOG & TOWN OF CHELMSFORD

To kickoff the project, NMCOG met with Paul Cohen, Town Manager and Christine Clancy, Director of Public Works from Town of Chelmsford to discuss scope. Participants in the meeting agreed that NMCOG would develop this assessment, outlining improvement options in the area and barriers to those options. Once complete, NMCOG would provide the study to the Town. There was a discussion on the concerns such as funding availability, impact on environment due to presence of wetlands, and an issue in getting approval for constructing an interchange of Route 3, to essentially serve commercial properties. The group acknowledged the fact that this interchange, if constructed, could bring in more vehicles to the area.

*Issue:* The quarry owned by Newport Aggregates has ramped up operations over the last two years, causing significant increases in the number of heavy vehicles using Ledge Road, Dunstable Road and Swain Road.

*Concerns:* Concerns raised related to the truck traffic are speeding, dust, and the increase in percent of truck traffic in the area.

*Response/Actions:* The various tasks discussed were to write a letter to the Chelmsford Select Board and conduct a Feasibility Study to identify barriers. A letter was sent to Select Board Chair Virginia Crocker Timmins on June 24, 2022 outlining updates on NMCOG's activities regarding Ledge Road and the surrounding areas of North Chelmsford.

The Feasibility study included meetings with stakeholders including the Towns of Chelmsford, Westford and MassDOT, technical memo and a presentation to the Chelmsford Select Board. The following sections include a summary of actions as part of this feasibility study.

#### *Update to Chelmsford Select Board*

NMCOG provided an update on activities to the Chelmsford Select Board in June 2022 regarding the Ledge Road and the surrounding area. NMCOG awarded funding to the Town of Chelmsford to conduct a study of the issues in the area through the region's DLTA program. Since that award, NMCOG has collected traffic volume data, adding to the database of volumes that our agency has collected for the Town over the past six years. This data collection effort includes the monitoring of truck volumes using the

roadways in and around Ledge Road, including Dunstable Road, Swain Road and Groton Road. NMCOG presented a summary of the monitoring efforts to the Town for review.

*Letter from Westford Select Board to Chelmsford Select Board*

Per the letter by Westford Select Board, the truck traffic problems that Chelmsford is facing is not unique to Chelmsford. Westford has also experienced similar increase in truck traffic. The Westford Select Board states that increases in truck traffic on Ledge Road are due to the lack of alternative access roads. The letter concludes by affirming that Newport Aggregates is one of the businesses that is attributed to an increase in truck traffic on Ledge Road. However, this traffic is not related to the nearby Newport Materials asphalt plant as the quarried materials are directly transported to the asphalt plant through internal roads.

*Letter from Congresswoman Trahan's office to NMCOG*

NMCOG received a letter from Congresswoman Lori Trahan's office in February 2022 requesting assistance in addressing the truck traffic concerns in the Route 40/Ledge Road area in the Town of Chelmsford (See Appendix). In the letter, Congresswoman Trahan points out that there has been an increase in the volume of truck traffic in the past two years due to the opening of the asphalt plant at the Westford town line and the expansion of the operations at the adjacent quarries. Concerns pointed out in the letter are – 1. Continuous flow of trucks through the narrow roadways accompanied with noise; 2. Safety concerns for school children, other pedestrians, and motor vehicle operators; 3. Repeated spills of crushed stone and bituminous concrete products along Groton Road and adjacent roadways. The letter outlines about exploring potential options to mitigate the issue – 1. An additional interchange with US Route 3; 2. Alternate routes; 3. Possible truck exclusion routes; 4. Other traffic calming alternatives.

#### **4.2 MEETING WITH MASSDOT REGARDING POTENTIAL INTERCHANGE**

NMCOG staff met with MassDOT District 4 to discuss an option to build a new interchange near Ledge Road, providing direct access to Route 3. Even though Route 3 is not an interstate highway, MassDOT adheres to Federal Highway Administration (FHWA) interchange justification criteria<sup>1</sup> and recommends exhausting alternatives prior to consideration of a new interchange. It was noted that an interchange at this location would violate the 1 mile spacing requirement for interchanges in urban settings. The group agreed that a proposal for interchange should benefit the general public, while in this case, it is mainly a private developer. Public funding for an interchange could be challenging when the direct beneficiary is a private developer.

In order for projects to be eligible for inclusion on the Regional Transportation Improvement Program (TIP) or State Transportation Improvement Program (STIP), the project must be

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<sup>1</sup> "INTERSTATE SYSTEM ACCESS INFORMATIONAL GUIDE". AUGUST 2010.  
<https://www.fhwa.dot.gov/design/interstate/pubs/access/access.pdf>

presented to and approved by the MassDOT Project Review Committee (PRC). MassDOT District 4 believes that a project to include a new interchange at Ledge Road would not be approved by the PRC, due to both design and potential adverse impacts of the project.

MassDOT concluded that this was a local issue between the Towns of Chelmsford and Westford and if any options were to be considered, it would need buy in from both communities.

#### **4.3 MEETING WITH WESTFORD**

Transportation Planners from NMCOG met with Jeffrey Morrissette, Director of Land Use Management in the Town of Westford to discuss the truck traffic issue in detail. When asked if criteria was used to determine the 400 truck trips per day limit for Newport Materials, NMCOG staff learned that the allowable truck trips were determined based on the discussions between Town of Westford and Newport Materials regarding the minimum number of truck trips necessary to carry out activities in their properties. Jeffrey Morrissette shared a map (Figure 8) showing the location of properties and the proximity to Route 3. The businesses in Westford, located at the end of Ledge Road are non-conforming pre-existing businesses that are not subject to current zoning regulations. When looking at the difference in distance of directing truck traffic directly to Route 3 via Groton Road versus Commerce Way to Route 3 through Groton Road (Route 40) is approximately 0.34 mile. If trucks were to access Newport Materials or the asphalt plant from Ledge Road, the route would be approximately 2.2 miles from town line to Route 3. Westford staff stated that vehicles accessing and egressing from their properties are not using the longer route. The asphalt plant is not using the Ledge Road access because Newport Materials is currently under their permitted number of daily trips. The Town of Westford went through Land Court to enforce the permit restrictions for Newport Materials and Town of Chelmsford did not participate in these proceedings. Westford remains open to meeting with Chelmsford to discuss further options.

Within the Newport Materials property, The Town of Westford has set up a video traffic monitoring system to verify truck and vehicle counts. This system tracks both inbound and outbound vehicle counts at the intersection of Groton Road and Commerce Way to ensure compliance with the trip limitation, and notifies the Town of Westford when this count exceeds the permitted counts. The Town of Westford, during their meeting with NMCOG, confirmed that the vehicle counts haven't exceeded the limitation as of the date of the meeting. In addition, Newport Materials provides monthly truck monitoring logs to Westford as a supplement to the video traffic monitoring system. Additionally, there is also less intensive video monitoring (without vehicle counts) about 500 feet north of the asphalt plant.

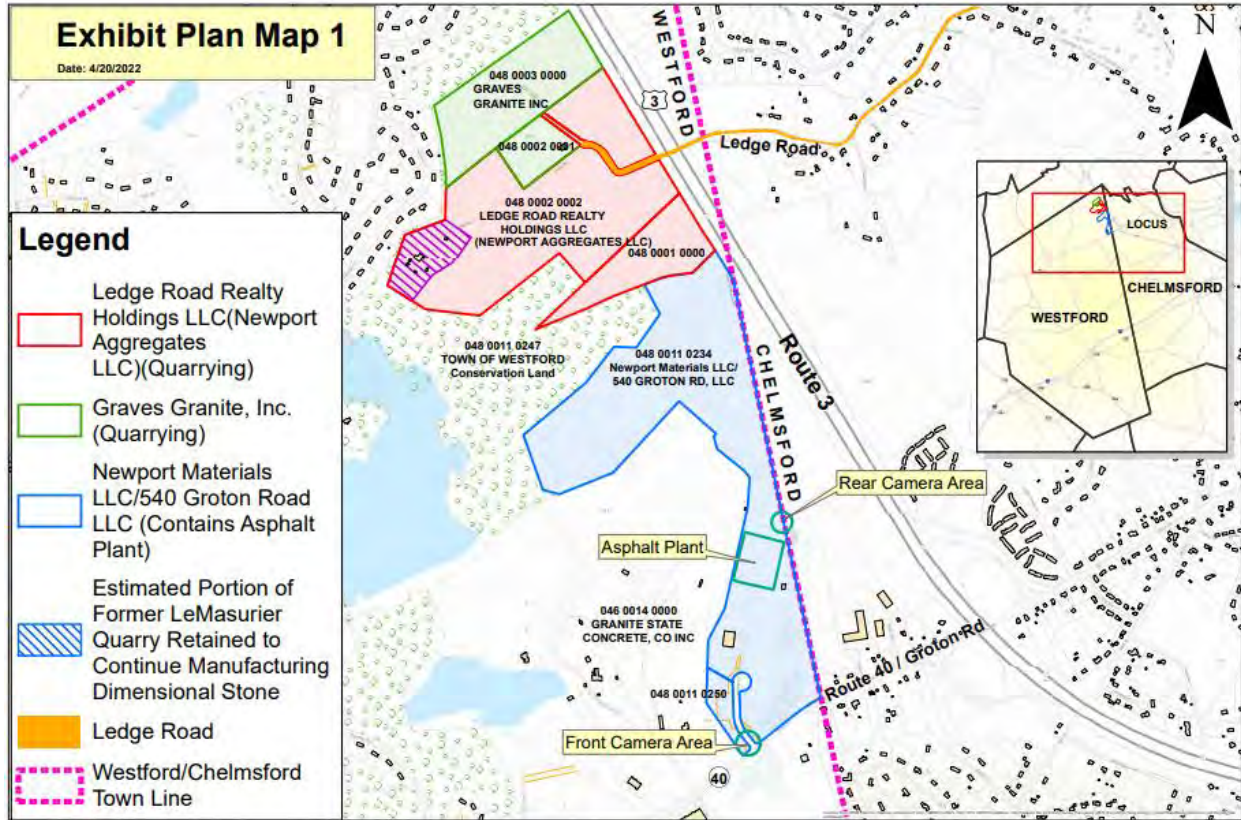


Figure 8 Map of the properties in Westford and location of ledge road. Source: Town of Westford.

Figure 8 highlights the properties in Westford, Westford/Chelmsford Town line and the location of Ledge Road. There are two cameras located at the front entrance at Route 40/Groton Road and a rear camera at the end of Commerce Way. Since access through Ward Way is not permitted, there are barriers in place that are checked a few times of year by Westford.

## 5 OPTIONS AND BARRIERS

### 5.1 OPTION 1: NEW INTERCHANGE AT ROUTE 3 AND LEDGE ROAD

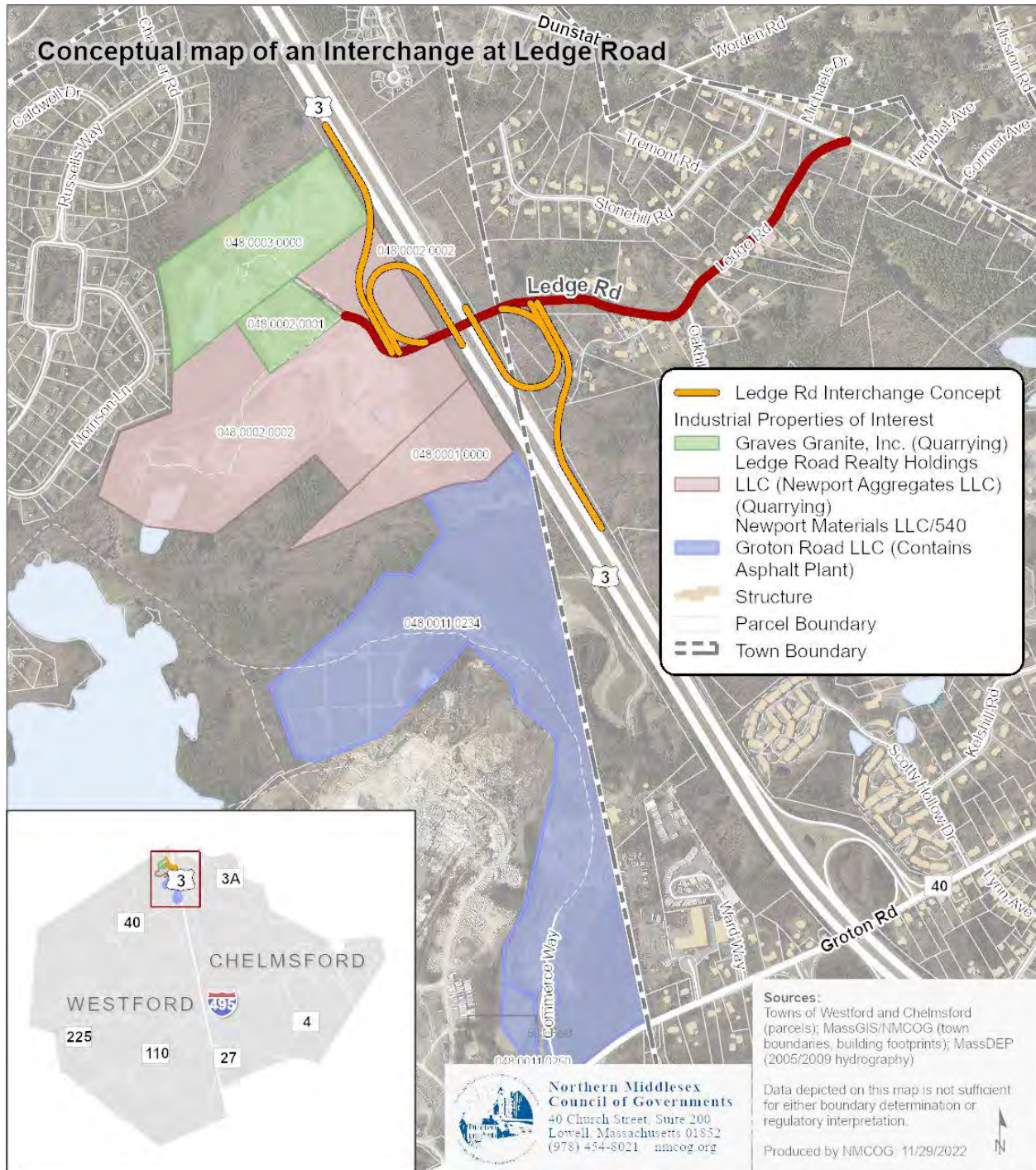


Figure 9 Map to visualize an interchange at Ledge Road.

A proposal for a new interchange should benefit the general public. In Ledge Road Interchange scenario, the primary beneficiary is a private business and a handful of residents, who would see less heavy vehicle traffic. The new interchange can in fact bring more vehicles in the future thereby more traffic issues. As per MassDOT, Route 3 is classified as a Limited Access Highway, and is on the National Highway System (NHS). MassDOT would be required to follow the Project Development Design Guide (PDDG)<sup>2</sup> and the FHWA Policy on Access to the Interstate System<sup>3</sup> in reviewing any specific proposals for new access to Route 3. To conclude, building a new interchange for commercial business does not meet MassDOT's criteria for approval or FHWA Policy on Access to the Interstate System.

In addition to the policy matters, there would also likely be significant issues related to environmental permitting, necessary right of way acquisition and funding for a project of this type. These issues have not been explored as part of this study.

#### *5.1.2 Barrier for Option 1: One mile spacing requirement*

An interchange at Ledge Road at Route 3 does not satisfy the one mile spacing requirement for urban interchanges. The interchange spacing distance is measured from centerline to centerline of the intersecting crossroads. The spacing requirements for freeways are one mile in urban areas and two miles in rural areas. As mentioned in MassDOT's summary email on why a new interchange is not possible at this location, any new access ramps must connect to a public road only, and must provide for all traffic movements. Ledge Road is not a public road in the vicinity of Route 3, and does not provide a connection to a public way on the west side of Route 3. Regardless of the source of funding, projects on the National Highway System (NHS) are required to be designed, constructed, operated, and maintained in accordance with Federal laws and regulations, and FHWA-approved directives, safety standards, design standards, and construction standards.

## **5.2 OPTION 2: USE OF NEWPORT MATERIAL INTERNAL ROADWAYS AND COMMERCE WAY**

Town of Chelmsford and Town of Westford should work together to move vehicles through Newport Materials property through Commerce Way to Groton Road and thereby to Route 3. The subject properties are located in Westford but are along the Westford/Chelmsford Town line and hence, there is a need for both the towns to coordinate to find a solution for their residents and businesses.

*5.2.1 Barrier for Option 2:* A special permit granted to Newport Materials allows the use of internal roads between subject property and other adjacent properties. These internal roads connect the quarry and the properties at the end of Ledge Road to Commerce Way and Ward

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<sup>2</sup> "Massachusetts Highway Department Design Guide Project Development & Design Guide". 2006. <https://bicycleinfrastructuremanuals.com/manuals3/MassDOT-%202006%20Project%20Development%20and%20Design%20Guide%20.pdf>

<sup>3</sup> "Policy on Access to the Interstate System". May 22, 2017. <https://www.fhwa.dot.gov/design/interstate/170522.cfm>

Way. However, Commerce Way is a private road while Ward Way is blocked and not in use. Any changes in access at Groton Road and Commerce Way would likely require a change in the existing permit, which may involve land court as well.

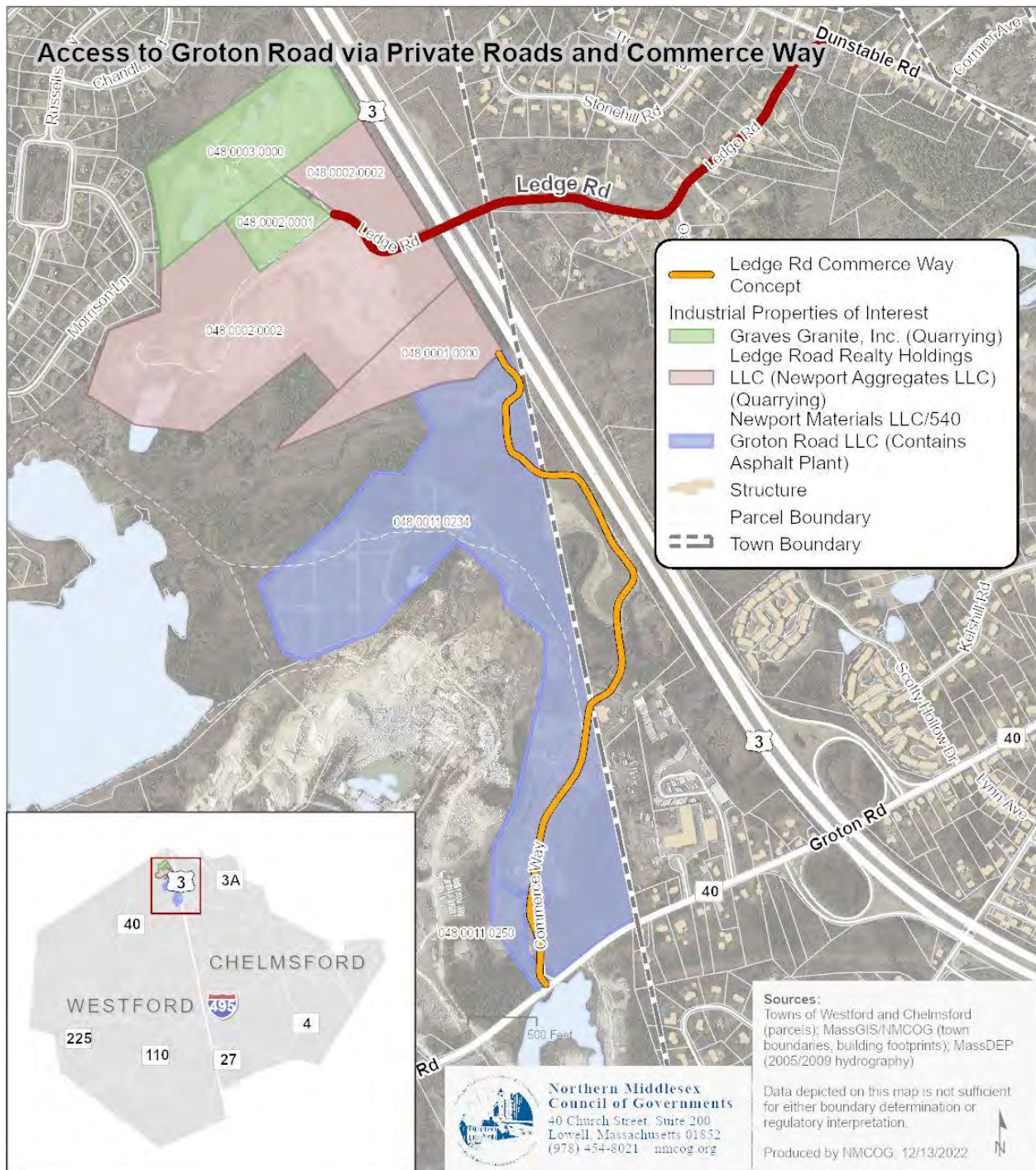


Figure 10 Access to Groton Road via Private Roads and Commerce Way.

**5.3 OPTION 3: PROVIDE LEDGE ROAD BUSINESSES AN ACCESS TO GROTON ROAD THROUGH WARD WAY**, which could reduce truck traffic on Ledge Road.

**5.3.1 Barrier for Option 3:** The existing permit does not allow the use of Ward Way as an access to Groton Road. In fact, Ward Way is monitored and blocked with a number of physical barriers preventing the use of this roadway – earthen berms, sound barriers, jersey barriers, boulders, drainage control measures, and treed areas. Quarterly inspections (excepting wintertime) are conducted to ensure that there are no new accesses developed.

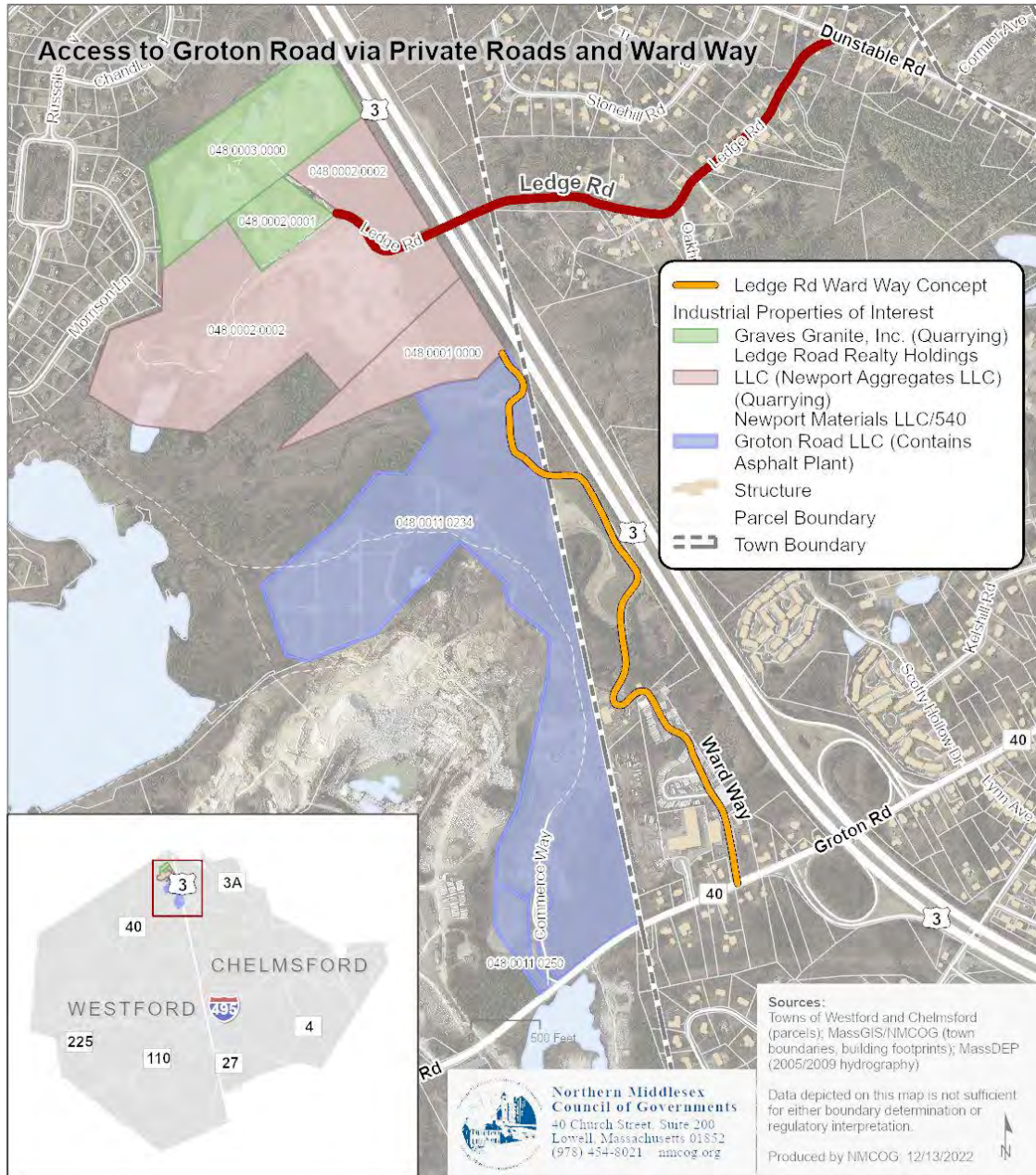


Figure 11 Access to Groton Road via Private Roads and Ward Way.



#### **5.4 Option 4: Implement Permit Restrictions on Businesses that Access Ledge Road**

In order to control and reduce the number of trucks using Ledge Road, Swain Road and Dunstable Road, implement permit restrictions on number of vehicles or restriction of hours available for use. There are other businesses in North Chelmsford that also use Ledge Road to access Route 3 and truck restriction on these businesses could potentially lower the number of trucks through Ledge Road.

*5.4.1 Barrier:* The subject businesses under discussion are in Westford, thus not under Chelmsford's jurisdiction. Ledge Road, where the truck traffic has the most effect on residents, is in Chelmsford.

#### **SUMMARY**

This memorandum provided an assessment of increased heavy vehicle traffic on Ledge Road, Dunstable Road and Swain Road in North Chelmsford and reviewed existing traffic conditions, summarized community meetings and feedback from the Massachusetts Department of Transportation (MassDOT), and identified potential solutions and barriers to those alternatives. In conclusion, with potential facilitation assistance from NMCOG, in order to effectively address potential next steps, the Towns of Chelmsford and Westford should review the alternative options and consider methods to improve the overall impact of truck traffic on Ledge Road and surrounding areas in North Chelmsford and East Westford. As part of an existing contract between MassDOT and NMCOG, NMCOG will continue to monitor traffic volumes and truck percentages in the area with the goal of providing traffic volume information and tracking changing conditions in Chelmsford and Westford.

LETTER FROM LEGISLATIVE DELEGATION TO NMCOG REGARDING  
LEDGE ROAD

February 23, 2022

Justin Howard  
Interim Executive Director  
Northern Middlesex Council of Governments  
40 Church Street, Suite 200  
Lowell, MA 01852

RE: North Chelmsford Commercial Truck Traffic

Dear Mr. Howard,

We are writing to request assistance from the Northern Middlesex Council of Governments (NMCOG) to address the commercial truck traffic concerns in the Route 40/Ledge Road area in the Town of Chelmsford. During the past two years, the opening of the asphalt plant at the Westford town line and the expansion of the operations at the adjacent quarries has resulted in a higher volume of commercial trucks. Residents of Ledge Road and adjoining streets have experienced a continuous flow of trucks along the narrow roadways, along with accompanying noise. This presents safety concerns for school children, other pedestrians, and motor vehicle operators. Additionally, there have been repeated spills of crushed stone and bituminous concrete products along Groton Road and adjacent roadways.

As the regional planning agency, NMCOG can effectively help explore options to improve the quality of life for the residents of North Chelmsford. NMCOG can serve as a facilitator with the Massachusetts Department of Transportation to help explore options such as an additional interchange with US Route 3, alternate routes, possible truck exclusion routes, and other traffic calming alternatives.

We look forward to working with NMCOG and Town of Chelmsford officials to address the commercial traffic safety concerns in the Route 40 region in order to improve the quality of life and safety for residents in the area.

Sincerely,



Lori Trahan  
Member of Congress (MA-03)



Michael Barrett  
State Senator, 3<sup>rd</sup> Middlesex District



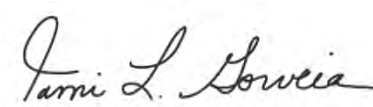
Virginia Crocker Timmins  
Chair, Chelmsford Select Board



Thomas Golden  
State Representative, 16<sup>th</sup> Middlesex District



James Arciero  
State Representative, 2<sup>nd</sup> Middlesex District



Tami Gouveia  
State Representative, 14<sup>th</sup> Middlesex District



Vanna Howard  
State Representative, 17<sup>th</sup> Middlesex District

LETTER FROM NMCOG TO CHELMSFORD SELECT BOARD  
REGARDING LEDGE ROAD ISSUES



# Northern Middlesex Council of Governments

June 27, 2022

A Multi-Disciplinary  
Regional Planning  
Agency Serving:

Chelmsford Select Board  
C/O Town Managers Office  
50 Billerica Road  
2<sup>nd</sup> Floor  
Chelmsford MA 01824

Billerica  
Chelmsford  
Dracut  
Dunstable  
Lowell  
Pepperell  
Tewksbury  
Tyngsborough  
Westford

Dear Chair Crocker Timmins,

I wanted to provide the Select Board a quick update on NMCOG activities regarding Ledge Road and the surrounding areas of North Chelmsford. As you know, NMCOG awarded funding to the Town for a study of issues in the area through the region's District Local Technical Assistance (DLTA) program. Since that award, NMCOG has collected traffic volume data, adding to the database of volumes that our agency has collected for the Town over the past six years. This data collection effort includes the monitoring of truck volumes using the roadways in and around Ledge Road, including Dunstable Road, Swain Road and Groton Road. We've presented a summary of our monitoring efforts to the Town for review. In addition, NMCOG has met with Town Manager Paul Cohen and Director of Public Works Christine Clancy to discuss the scope of the DLTA project. Participants in the meeting agreed that NMCOG would develop a feasibility study, outlining improvement options in the area and barriers to those options. Once complete, NMCOG will provide the study to the Town for your consideration. Please let me know if you have any questions or comments. I can be reached by email at [jhoward@nmcog.org](mailto:jhoward@nmcog.org) or by phone at 978-454-8021, extension 121.

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Andrew Deslaurier  
Chair

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Justin Howard  
Assistant Director

Sincerely,

Justin Howard  
Assistant Director  
Northern Middlesex Council of Governments

40 Church Street  
Suite 200  
Lowell, MA  
01852-2686

TEL: (978) 454-8021

FAX: (978) 454-8023

[www.nmcog.org](http://www.nmcog.org)

CORRESPONDENCE FROM WESTFORD SELECT BOARD TO  
CHELMSFORD SELECT BOARD



**TOWN OF WESTFORD  
SELECT BOARD**

TOWN HALL  
55 Main Street  
WESTFORD, MA 01886  
Telephone (978) 692-5501 Fax (978) 399-2557

April 26, 2022

Virginia Crocker Timmins, Chair  
Kenneth Lefebvre, Vice Chair  
Chelmsford Select Board  
50 Billerica Road  
Chelmsford, MA 01824-2777

Re: Newport Materials Asphalt Plant  
Truck Traffic on Ledge Road

Dear Chair Timmins and Vice Chair Lefebvre:

This letter is in response to your March 14, 2022 correspondence to the Westford Select Board, regarding commercial truck traffic on Ledge Road in North Chelmsford, Massachusetts. We appreciate your cited concerns about the safety of school children, pedestrians, and drivers, and your desire to address complaints raised by the residents of Ledge Road and adjoining streets. In general, you asked for clarification relating to vehicle trip limitations, video monitoring activities, and access/egress restrictions imposed by the Westford Planning Board decision granting a Special Permit for a Major Commercial Project for the Newport Materials asphalt plant located at 540 Groton Road (also known as 10 Commerce Way) in Westford, Massachusetts. In consultation with our Land Use Management Department, we provide you with the following information.

Some Relevant Background Information:

In the special permit granted by the Westford Planning Board for the Newport Materials asphalt plant, the “entirety of the subject site” consists of two adjoining lots (and Commerce Way) totaling more than 93.5 acres in land area in Westford (hereinafter referred to as the “subject property”, please refer to the attached Exhibit Plan). The special permit was incorporated into an Agreement for Judgment between the applicant and the Town of Westford, and the Judgment was endorsed by and entered in the Land Court. The primary parcel includes the asphalt plant, materials processing yard, and laboratory building, which is identified as Map 048 Block 0011 Lot 0234 by Westford GIS, contains approximately 90.51 acres in area, and is more commonly referred to as 540 Groton Road and 10 Commerce Way. The second parcel, located at the intersection of Groton Road and Commerce Way, is identified as Map 048 Block 0011 Lot 0250 by Westford GIS, contains approximately 2.99 acres in area, and is sometimes referred to as Lot 2 Commerce Way.

As you are aware, a condition of approval for the asphalt plant was the limitation of vehicle trips to 400 trips per day along with additional conditions regulating traffic to and from the subject property. These conditions, however, exclude adjoining properties such as the Granite State Concrete Quarry (formerly the Fletcher Quarry) to the west, the former LeMasurier Quarry and W. J. Graves Quarry to the north, and other adjoining properties located in Chelmsford. The two lots which make up the subject site were the only properties included in the special permit application to the Planning Board and, therefore, the terms and conditions of the special permit decision govern the use of only those two lots. However, in this case, special efforts were made by the Town's Planning Board to prevent the Applicant from attempting to circumvent vehicle trip limitations for the asphalt plant by accessing the subject property through adjoining parcels of land. Additionally, materials quarried on adjacent or proximate properties were permitted to be brought onto the subject property through internal roadways without penalty (i.e., does not count toward the 400 vehicle trips limit), provided that the materials are used for the onsite manufacturing of bituminous concrete. Such "internal" trips were specifically encouraged because it could result in a reduction of truck traffic on public ways.

#### 1) Vehicle Trips Limitations

##### Question 1:

*How is the Town of Westford verifying truck and vehicle count compliance for the "entirety of the subject site"?*

##### Response 1:

*The Town of Westford (Westford) verifies truck and vehicle count compliance of the subject property through a video traffic monitoring system. This system also tracks inbound and outbound vehicle counts at the site entrance (near Groton Road), and provides notification to the town for any detected exceedances. The video monitoring system is supplemented by monthly Truck Monitoring Logs provided by Newport Materials to the Town of Westford.*

##### Question 2:

*How is the Town of Westford capturing truck and vehicle activities associated with the "entirety of the subject site" vs. all the other users of the Chelmsford roadways including Ledge Road?*

##### Response 2:

*Westford verifies truck and vehicle count compliance of the subject property through a video traffic monitoring system as stated above. Westford is not required to monitor truck traffic on Ledge Road (or other roads in Chelmsford) to ensure compliance with vehicle restrictions. Pursuant to the Settlement Agreement amongst the Town of Westford, Newport Materials, LLC, and 540 Groton Road, LLC, the 200-vehicle limitation (400 vehicle trips) excludes internal trips between the subject property and the Fletcher Quarry (at 534 Groton Road) and the former LeMasurier Quarry off Ledge Road. Vehicles accessing the former*



*LeMasurier Quarry via Ledge Road for purposes of maintaining the existing operations of the quarry are also specifically excluded from this limitation.*

## 2) Video Monitoring

### Question 3:

*Where is videotaping to verify truck and vehicle counts occurring?*

### Response 3:

*Video monitoring occurs at the main entrance to the subject property located at the intersection of Groton Road and Commerce Way to ensure compliance with the 400 vehicle trips limitation. Additional, but less intensive (without vehicle counts), video monitoring is also conducted approximately 500 feet to the north of the asphalt plant, which affords an opportunity to examine an important “crossroads” of the “internal” road system which leads to the onsite solar farm, and the adjacent quarries.*

### Question 4:

*Is videotaping for truck and vehicle counts occurring only at the Commerce Way entrance/egress?*

### Response 4:

*No, please see Response 3 above.*

### Question 5:

*Is there any video taping occurring at the back of plant operations site(s) or at other access points?*

### Response 5:

*Please see Response 3 above.*

### Question 6:

*How does the Town of Westford ensure compliance with the requirement that all traffic originating from an offsite location other than Fletcher Quarry or an adjacent property in the same ownership as the site use the Commerce Way access?*

### Response 6:

*From a practical standpoint, the only probable offsite locations are 7 Doris Drive and 1 Ward Way in Chelmsford, open space land associated with the Villages at Greystone that is in the care and custody of the Westford Conservation Commission, and a limited strip of land between 21 and 23 Morrison Lane in Westford. As confirmed by recent inspection, there is*

*no evidence that any of these adjoining Westford properties are being used as a means of vehicular access for the Newport Materials asphalt plant. With respect to Doris Drive and Ward Way, there are a combination of physical barriers preventing access to these adjoining properties in Chelmsford – earthen berms, sound barriers, jersey barriers, boulders, drainage control measures, and treed areas. Inspections are generally conducted on a quarterly basis (excluding wintertime) to confirm that the barriers are in place, and that there is no evidence of any new access roads being developed or in existence.*

3) Other Access/Egresses

Question 7:

*Does the applicant's purchase of the Le Masurier Granite Quarry and its entrance/egress via Ledge Road fall under the permit condition prohibiting any cut through use of any other access/egress from a site other than Commerce Way? If so, how does the Town of Westford ensure compliance with this condition?*

Response 7:

*Please see Response 2 above.*

Please be aware that the problems Chelmsford is experiencing with truck traffic is not unique to Chelmsford. Westford, too, has experienced increased truck traffic on our roads. Unfortunately, issues surrounding the uses generating truck traffic are often complicated, and even more difficult to address. While we are sympathetic to your concerns, it is our opinion that truck traffic on Ledge Road is most likely attributed to the multiple businesses which rely on Ledge Road for their access. A cursory review indicates that there are at least three (3) businesses which derive access from Ledge Road – W. J. Graves Quarry, Newport Aggregates, LLC (former LeMasurier Quarry), and LeMasurier Granite (manufacturing and retail of dimensional stone products). While Newport Aggregates, LLC (former LeMasurier Quarry) may be one of several businesses contributing to the perceived increase of truck traffic on Ledge Road, it is our opinion that this traffic is unrelated to the nearby Newport Materials asphalt plant, as quarried materials are permitted to be transported directly to the asphalt plant through internal roads.

We hope your questions have been adequately addressed.

Sincerely,

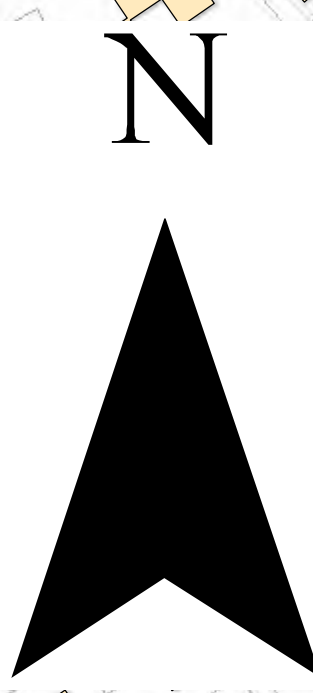


Andrea Peraner-Sweet, Chair  
Westford Select Board

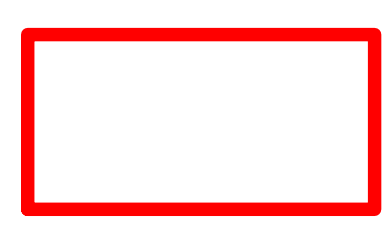

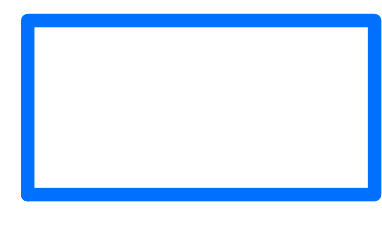
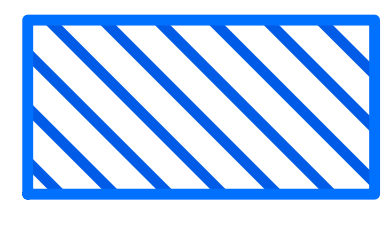

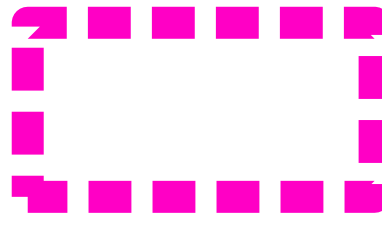
cc: Westford Select Board  
Jodi Ross, Town Manager  
Jeffrey Morrissette, Director of Land Use Management

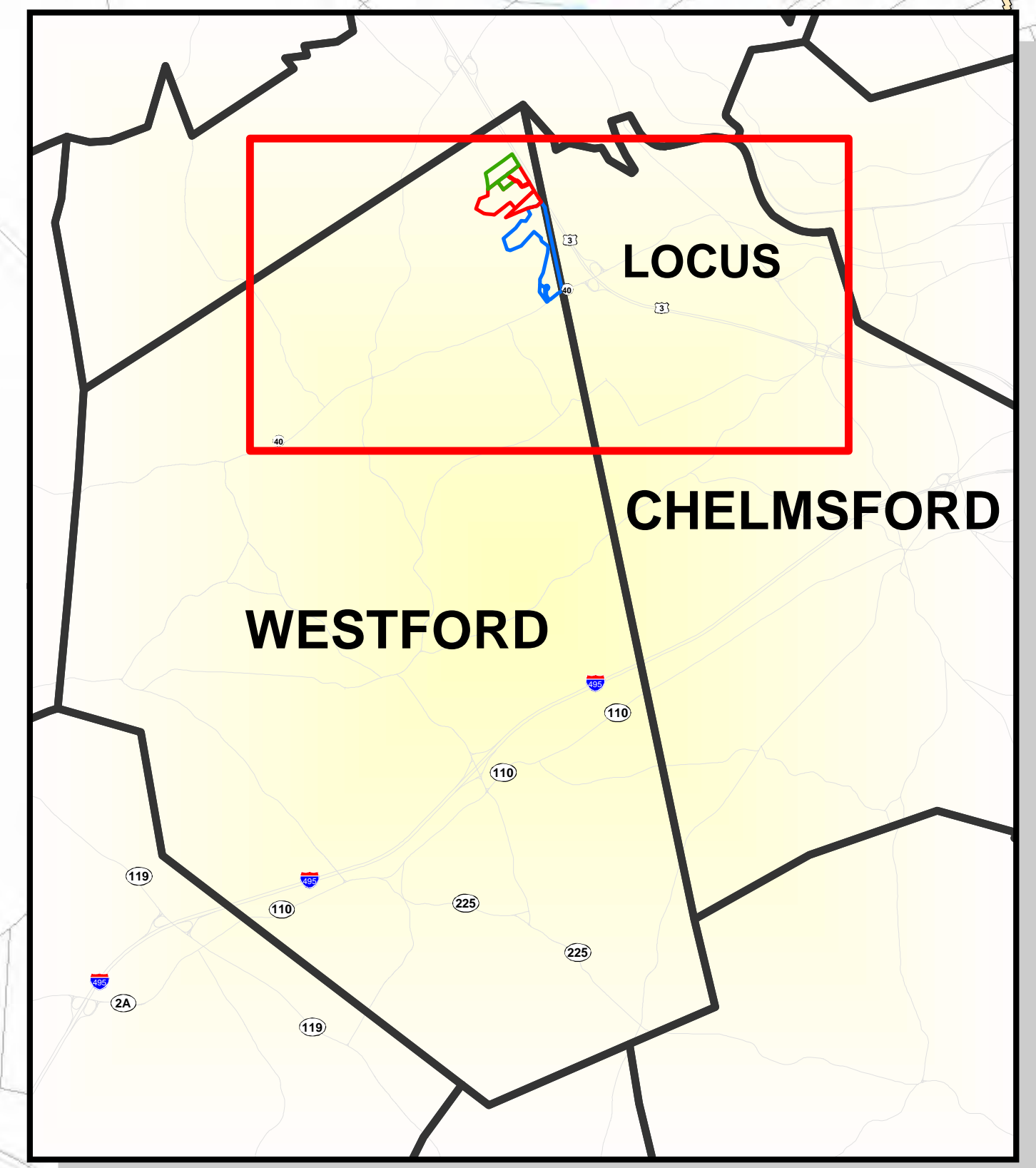
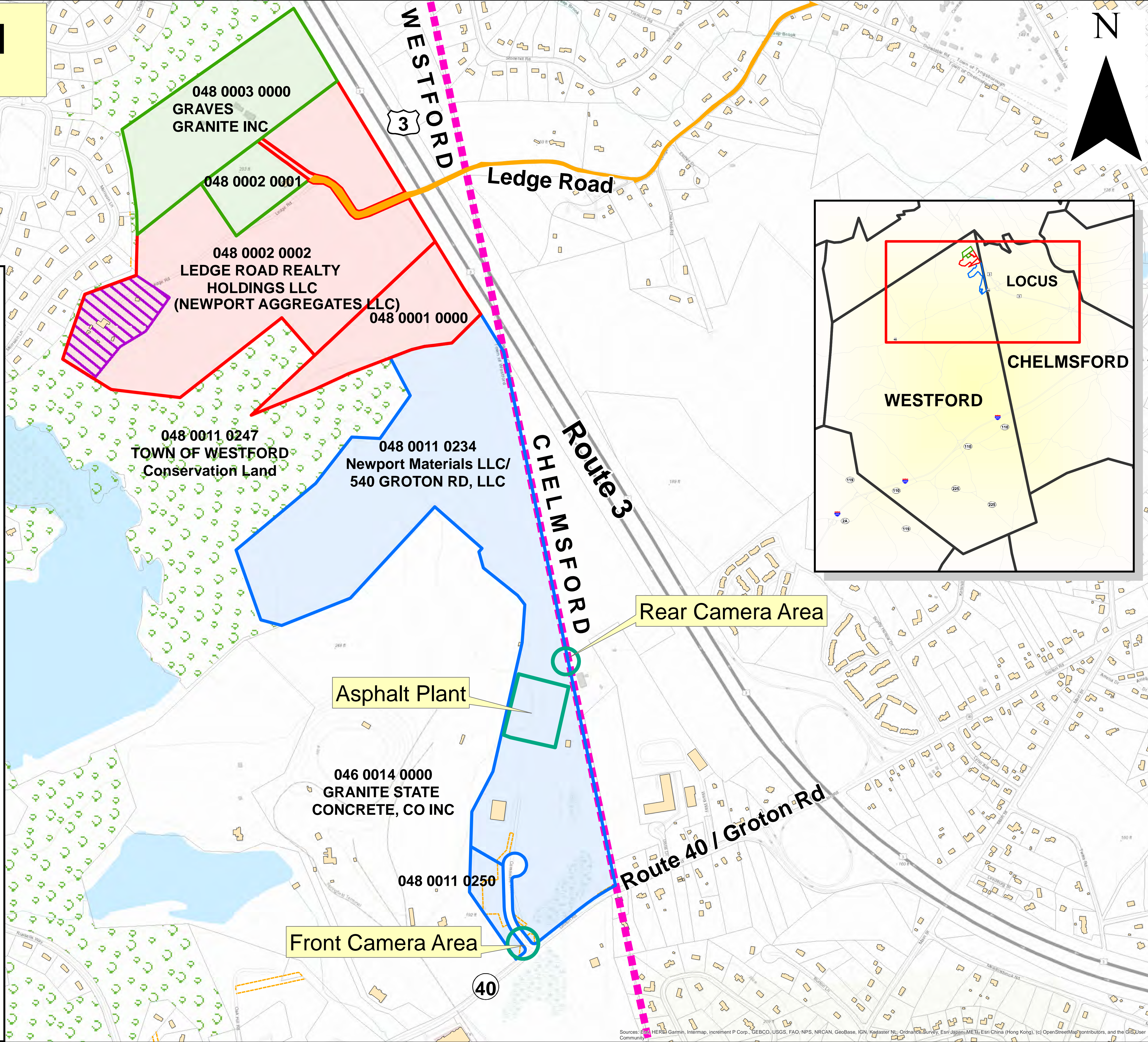
# Exhibit Plan Map 1

Date: 4/20/2022



## Legend

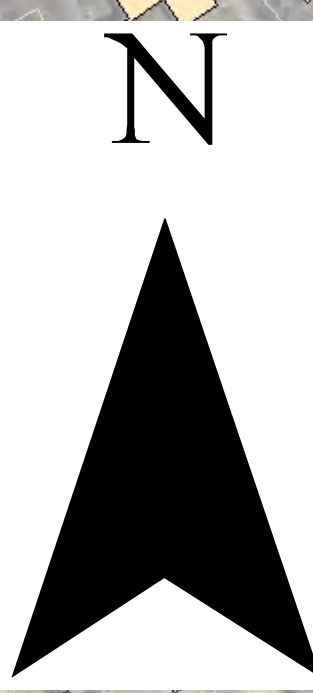
-  Ledge Road Realty Holdings LLC (Newport Aggregates LLC) (Quarrying)
-  Graves Granite, Inc. (Quarrying)
-  Newport Materials LLC/540 Groton Road LLC (Contains Asphalt Plant)
-  Estimated Portion of Former LeMasurier Quarry Retained to Continue Manufacturing Dimensional Stone
-  Ledge Road
-  Westford/Chelmsford Town Line





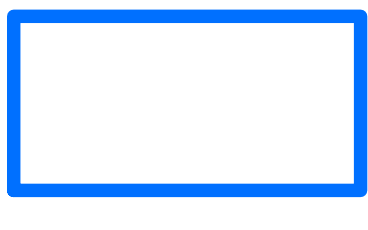
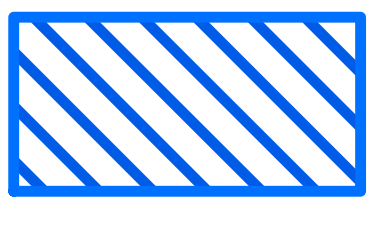

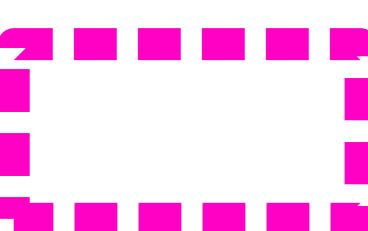
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, Geobase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), Swisstopo, Sweco, AutoNavi, Swatch, Bing, OpenStreetMap contributors, and the GIS User Community

# Exhibit Plan Map 2

Date: 4/20/2022 2021 Ortho Image (MassGIS)



## Legend

-  Ledge Road Realty Holdings LLC (Newport Aggregates LLC) (Quarrying)
-  Graves Granite, Inc. (Quarrying)
-  Newport Materials LLC/540 Groton Road LLC (Contains Asphalt Plant)
-  Estimated Portion of Former LeMasurier Quarry Retained to Continue Manufacturing Dimensional Stone
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