

April 16, 2025

Ashland Zoning Board of Appeals  
Ashland Town Hall  
101 Main Street  
Ashland, MA 01721

Attn: John Trefethen, Chair

Subject: Transportation Consulting Services  
Proposed The Sanctuary at Ashland Mills (40B)  
10-60 Main Street, Ashland, MA

Dear Chair and Board Members:

MDM Transportation Consultants, Inc. (MDM) is pleased to provide you with the following supplemental transportation review comments for the above-referenced project. These comments have been prepared based on review of Proponent's response memoranda prepared by Proponent dated April 1, 2025, project coordination meeting with the Town of Ashland department heads on Monday, April 14 2025 via Zoom, and a review of updated Site plans prepared by Bohler Engineering dated March 19, 2025 and documentation provided by Proponent as identified below. To facilitate response by Proponent, review items requiring response are noted in ***Bold Italic***.

MDM finds that the Proponent's submitted materials partially address comments issued in our March 14, 2025 review letter; outstanding issues to be addressed by Proponent are identified herein and include further modification of site access improvements to address vehicle maneuverability requirements; updated swept path analyses; further clarification of parking allocation and management policies for the development; and general transportation-related site plan commentary.

### **Documents Reviewed**

MDM has reviewed the following documents to gain an understanding of the project and determine if industry standards have been applied in determining the potential impacts of the project. The following relevant documents were reviewed:

- *The Sanctuary at Ashland Mills Parking Narrative*, prepared by SLV Ashland, LLC dated April 1, 2025.

- *The Sanctuary at Ashland Mills – Response to Outstanding MDM Transportation Comments Provided at March 25<sup>th</sup> Public Hearing*, prepared by SLV Ashland, LLC dated April 1, 2025.
- *Site Plan Sheet C-301 – Proposed 40B Development “The Sanctuary at Ashland Mills, 50 Main Street, Ashland, Massachusetts*, prepared by Bohler Engineering as updated through March 19, 2025.
- *Truck Turns Exhibits B, C, & D: Fire Truck; SU-30, SU-40* prepared by Bohler Engineering dated March 28, 2025.
- *Preliminary Parking Allocation Exhibit A*; prepared by SLV Ashland, LLC dated April 1, 2025.

**Comment 3(b) (Safety Analysis, Myrtle Street)**

*Original Comment: Left-turns exiting onto Myrtle Street will be severely limited by a proposed retaining wall and fence as well as proposed landscaping. Review of sight lines for the proposed site plan are limited to approximately 170 feet looking south (toward Main Street) by the proposed retaining wall, which has an elevation of more than 4 feet above driveway grade.*

**Proponent Response:** The Site Plans will be revised to relocated the retaining wall outside of the sight triangle area and the updated landscape plan, included with this submission, has also be modified such that no object located within the sight triangle area of the Myrtle Street Project site driveway will exceed 2-feet in height.

*Supplemental Comment (March 24, 2025): Site Plans as updated through March 12, 2025 (Sheet C-301) depict sight line triangles for the Myrtle Street driveway based on adjusted wall location, indicating approaching vehicles will have approximately 200 feet of available stopping sight distance (SSD) – a criteria that only “exactly” meets the absolute minimum intersection sight line criteria for measured (85th percentile) travel speeds. We note the importance of maximizing available sight lines at this driveway as it will serve as the primary site driveway for the development and associated service and emergency response vehicles. We therefore advise Proponent to adjust driveway geometry to properly accommodate vehicle sweeps per Comment 12(e) and further modify wall location to maximize sight lines with the goal of achieving sight lines that are as close to recommended ideal distance as possible. Preliminary assessment by MDM indicates that change in driveway alignment in combination with wall adjustment may improve intersection distance to 260 feet or more which is more in line with recommended (ideal) intersection sight distance of 290 feet.*

**Proponent Response April 1, 2025 (Paraphrased):**

At the most recent public hearing, MDM and the Zoning Board of Appeals asked if we could assess the opportunity to increase the sight line visibility/distance at the proposed Myrtle Street driveway.

Bohler re-examined the Myrtle Street egress and concluded that the sight line distance can not be increased without jeopardizing the necessary compensatory flood storage required as part of the civil engineering design. Or put differently, the proposed retaining wall/fence can not be relocated without reducing the flood storage below what is required by DEP.

The Bohler Engineering Team has advanced many site plan iterations of grading to design to the current and necessary floor storage requirements. The Applicant could increase sight line distances at Myrtle Street if the Applicant were allowed to remove the existing building; a development scenario that the Board of Selectmen and other municipal boards discouraged during preliminary discussions on this project.

*We would like to emphasize that Vanasse and Associates has opined that the proposed sight distances meet all applicable regulations and standards for a safe operation for ALL driveways.*

***MDM Final Comment: MDM acknowledges that the Site Plans as updated through March 12, 2025 (Sheet C-301) depict sight line triangles for the Myrtle Street driveway based on adjusted wall location, indicating approaching vehicles will have approximately 200 feet of available stopping sight distance (SSD) – a criteria that only “exactly” meets the absolute minimum intersection sight line criteria for measured (85th percentile) travel speeds. Further adjustment of the Myrtle Street driveway is necessary per Comment 12(b) to accommodate fire apparatus; a further shift of the driveway north (away from Main Street) would increase sight lines by another 20 to 30 feet, thereby ensuring that more than the absolute minimum SSD criteria may be met for the driveway.***

**Comment 3(b) (Safety Analysis, Main Street Southern Driveway)**

*Original Comment: Left-turns out of the driveway located south of the Pleasant Street signal will be severely limited by vehicle queues along Main Street that regularly extend to and past the driveway from the Pleasant Street signal, raising concern for conflict with oncoming (southbound) traffic. Likewise, landscaping features (trees) may also impede sight lines at this driveway location unless modified to avoid the driveway sight line triangle.*

**Proponent Response:** Movements entering and exiting the Project site at the Main Street southern Project site driveway will be restricted to right-turn only. The driveway design will be revised accordingly and appropriate signs (“Right Turn Only” and “No Left Turn”) will be installed to regulate the left-turn restriction. The Project-generated trip assignment networks and the corresponding 2031 Build condition peak- hour traffic volume networks have been revised accordingly (see Figures 8R through 16R).

*Supplemental Comment (March 24, 2025): Driveway design as proposed is not likely to be effective at controlling/restricting left-turn movements at the driveway and as described under comments 12(b) and 12(c) would not properly accommodate fire apparatus and service vehicle swept paths without encroaching into opposing travel lanes. A driveway design that incorporates more restrictive turn movements is recommended including a raised delineating island that separates inbound (right-turn only) and outbound (right-turn only) movements with corresponding pavement markings and signs that reinforce turn restrictions.*

**Proponent Response April 1, 2025:**

Site Plans as updated through Revision 5 March 19, 2025 (Sheet C-301) depict a more restrictive right-in/right out island on the Main Street Driveway.

*Final Comment: A review of the AutoTurn exhibits (Single Unit 30, Single Unit 40, and Ladder Truck) indicate that the current design would not properly accommodate fire apparatus and service vehicle swept paths without encroaching into opposing travel lanes at Myrtle Street. Likewise, modification of the Main Street driveway geometry is necessary to properly accommodate vehicle sweeps. Additional input by Fire Department also requires accommodation for emergency vehicle (tower vehicle and ambulance) left-turn existing movement onto Main Street. Refer to attached redline plans prepared by MDM which suggest (in concept form) the geometric changes necessary to address vehicle swept path movements and Fire Department maneuvering requirements. Design modifications include*

*wider driveway lanes at Main Street with additional scored concrete panels and adjusted curb radii. The Myrtle Street driveway design modification include shifting the driveway alignment north with enlarged curb radius to accommodate right-turn movements by service and emergency apparatus. Shifting the Myrtle Street driveway alignment north would have the added advantage of increasing sight distance to Main Street by approximately 20-30 feet, thereby ensuring that more than the absolute minimum SSD criteria may be met for the driveway.*

### **Comment 8(a) Parking**

*Original Comment: MDM anticipates that the proposed parking supply may be “right-sized” to support the proposed uses based on parking ratios commonly provided for similar projects in the Commonwealth and the relatively low bedroom count for the residential building; however, we recommend that Proponent submit calculations of the hourly shared demand for the project based on ITE Parking rates and methodology to validate the proposed shared parking supply. It would be beneficial to identify the primary parking areas for the various uses on-site (residential, commercial, restaurant, public plaza space) to make sure that each use has an appropriate number of spaces in the vicinity of the individual building entryways.*

**Proponent Response:** In order to determine the parking requirements of the specific land uses that will be located within the Project site, a parking demand analysis was performed using parking demand data published by the Institute of Transportation Engineers (ITE). Table P1 summarizes the average ITE peak parking demand ratios for each of the land uses that will be located within the Project site. Note that the commercial component of the Project has been refined to include 6,500 sf of retail space (vs. 7,782 sf) and 5,000 sf of restaurant space (vs. 7,783 sf).

Table P2 summarizes the peak parking demands for the Project on a weekday applying the average peak parking demand ratios shown in Table P1 to each of the respective land uses that are expected to be located within the Project site. As can be seen in Table P2, using the average observed peak parking demands, the Project is predicted to have a peak parking demand of 369 occupied parking spaces on a weekday.

It is important to note that the peak parking demand periods for the proposed uses do not occur simultaneously. For a residential use, the

peak parking demand occurs between 12:00 AM and 4:00 AM on a weekday, with the peak parking demand for retail and restaurant uses occurring at 12:00 PM or 1:00 PM on a weekday. Distributing the peak parking demands for each of the respective land uses over the course of the day results in an overall peak parking demand for the Project of 308 parking spaces (the peak parking demand for the residential uses) that is predicted to occur after 11 PM and before 4:00 AM. During the peak parking demand period for the retail and restaurant uses (between 12:00 PM and 1:00 PM), the peak parking demand is predicted to be 219 parking spaces. Given that the Project will have no less than 365 parking spaces, the available parking supply should be sufficient to accommodate the peak parking demands of the Project. The parking demand calculations for the Project are attached.

A color coded parking location plan will be provided that illustrates the location of parking spaces by use (e.g., residential, retail, guest, etc.).

*Supplemental Comment (March 24, 2025): Parking supply in the aggregate appears to be sufficient to support proposed site programming; however, as elaborated in Comment 8(b) the lack of garage gate/access controls may lead to parking preference in certain areas of the Site to the disbenefit of tenants who chose to lease garage spaces at a premium. A more defined parking management plan indicating controls/assignment of tenant/visitor/commercial use spaces is appropriate to ensure that the distribution and use of parking spaces is well defined and managed. As noted by Planning Board commentary at the February 2025 hearing, wayfinding signs should also be considered to direct patrons/visitors to appropriate parking areas within the site.*

**Proponent Response April 1, 2025 (Paraphrased):**

Proponent has provided an overview of proposed parking management for the property entitled “*The Sanctuary at Ashland Mills Parking Narrative*” that confirms “unbundled” parking policy (i.e., separate charge for a parking space if requested by tenant); unassigned parking protocol (tenants to display sticker authorizing parking use but will not be specifically assigned to a numbered space); and intended allocation of parking among tenants/visitors/commercial patrons (per color-coded site mapping). Proponent has also provided detailed parking demand analysis prepared by VAI in tabular format that indicates the following trends (attached for reference):

- Peak parking demand by residential tenants ranging from 308 vehicles (average peak) to 363 vehicles (85<sup>th</sup> percentile peak) that occur during overnight hours.

- Midday parking demand by combination of residential tenants and commercial patrons ranging from 219 vehicles (average peak) to 283 vehicles (85th percentile peak) that occur at approximately noontime.
- Early evening parking demand by combination of residential tenants and commercial patrons ranging from 274 vehicles (average peak) to 340 vehicles (85th percentile peak) that occur at approximately 7 PM to 8 PM.

The parking demand analysis supports a finding that proposed parking supply of 365 spaces total on the site will meet projected peak demands throughout a typical day.

*Final Comment: MDM acknowledges that the general framework of parking management for the site may reasonably accommodate peak parking demands subject to the following qualifying conditions:*

- 1. Spaces allocated to commercial uses, which are shown on the color-coded "Parking Allocation Plan" be marked/signed for the site's commercial tenant/patron use during normal business operating hours (total of 59 spaces). Residential tenant parking allocation to surface spaces should expressly acknowledge these parking restrictions. (Note that spaces 37-49 are incorrectly color coded and should be rectified for the record).*
- 2. Active monitoring of site parking activity by a management company to ensure surface parking on the site is not overburdened during early evening periods when there are concurrent residential tenant and commercial tenant demands. Proponent should expressly limit the number of tenant vehicle space leases that are allocated to surface lot; "overbooking" these lower-cost surface spaces to tenants could lead to overburdened surface parking.*
- 3. Protocols and loading area designated for tenant move-in/move-out should be expressly identified in the parking management program, specifically requiring pre-arranged reservation with management staff to the area designated for move-in/move-out vehicle staging and restricted to SU-30 or equivalent vehicles unless special arrangements are made for an area of the site that can accommodate a larger vehicle size.*

4. *The staging area on current plans is limited to a 36 foot zone near the rear parking garage entrance, which is not of sufficient length to accommodate extension of a rear loading ramp from a SU-30 type vehicle. Provision of an expanded loading area behind the building is recommended that may be achieved by actively managing/reserving parking spaces adjacent to the loading area (spaces 52-61 on the Parking Allocation Plan) for loading vehicle use during non-peak parking demand periods.*
5. *Parking at the Main Street surface lot should be specifically designated for short-term use only by site visitors (1 hour or less), thereby reducing potential for use by commercial tenant patrons and non-residents requiring longer term parking duration.*
6. *Wayfinding signs/markers that reinforce use of the Main Street easterly driveway by residents/guests only and that encourages use of the Myrtle Street driveway for commercial tenant/patron use.*

#### **Comment 8(b) Parking**

*Original Comment: Proponent should consider providing a secondary access/egress point for the garage given the sole garage access is within the flood zone of the property, the number of spaces served and to facilitate emergency egress.*

**Proponent Response:** It is important to emphasize that the proposed garage is an “open” garage designed to allow for the free inflow and outflow of water. There will be no gate nor garage door that could malfunction, nor anything that could potentially block or inhibit the entrance or existing of vehicles. In addition, there will be multiple entrances and exits for residents to safely exit the garage in any situation.

Moreover, flooding events are typically predictable and anticipated and with adequate advance notice, vehicles can be moved to alternate locations out of the flood plain. In addition, the upper level of the garage, which is above the flood plain has an egress stair to street level. And the elevator lobbies and trash room are also above flood plain.

This project will be institutionally managed by a national property management company. There will be communication protocols in place with all residents to provide the appropriate notifications and communications should a possible flood event be on the horizon.

As a condition of an occupancy permit, the Applicant could share the property management plan for flood events for review by the Town.

*Supplemental Comment (March 24, 2025): MDM understands that Proponent is in process of evaluating a secondary garage driveway; details of this second vehicular garage access point will be reviewed when made available.*

*Regarding “open” garage design, Proponent should clarify how use of garage spaces will be controlled/managed in the absence of gate/access controls. Garage parking represents a premium weather-sheltered facility that in absence of gate/access controls may be used by the general public for retail/restaurant use, tenant visitors or even patrons of other nearby businesses if deemed more convenient than on-street parking. Lack of garage access controls also raises question of whether Proponent intends to “unbundle” parking from tenant leases (a recommended TDM element).*

**Proponent Response April 1, 2025 (paraphrased):**

The updated site plan incorporates a second garage driveway on the easterly side of the building. Proponent has also provided an overview of proposed parking management for the property entitled “The Sanctuary at Ashland Mills Parking Narrative” that confirms protocols for garage parking allocation (resident only, restricted by signs and resident parking sticker program/monitoring).

*Final Comment: The secondary driveway and its location appropriately address the secondary garage access/egress at an appropriate location within the Site. Refer to comment 8(a) for recommended parking management framework.*

**GENERAL SITE PLAN COMMENTS - TRANSPORTATION**

**Comment 12(a): Sidewalk Design at Driveways**

*Original Comment: The driveways on Main Street should be designed to be consistent with recently built infrastructure in the downtown; specifically, this design eliminates the traditional ADA ramp designs and marked crossing with a continuous sidewalk with “tip-down” driveway to provide a continuous pedestrian sidewalk elevation through the driveway – therefore favoring pedestrian movements.*

Proponent Response: The Site Plans will be revised to reflect the use of “pan-type” driveways where the sidewalk is flush across the driveway.

*Final Comment: The Site Plan continues to show traditional ramps with substandard 5-foot-wide market crosswalks. The Site Plan indicated that the design of the driveways needs to be adjusted to show a continuous sidewalk with “pan-type” driveways to provide a continuous pedestrian sidewalk elevation through the driveways – therefore favoring pedestrian movements and promoting slower travel speeds.*

**Comment 12(b): Swept Path Modeling – Fire Apparatus**

*Original Comment: Provide swept path analysis/modeling for the site using the current Fire Department tower vehicle/template dimensions. Modeling should include movements to/from each of the site driveways and circulation aisles as well as the front parking lot along Main Street that provides short-term parking as this is likely the main point of entry for emergency calls.*

Proponent Response: A vehicle turning (swept path) analysis has been performed for the Project and will be provided for the following design vehicles: SU-30, SU-40 and Ashland Fire Department design vehicle.

*Supplemental Comment (March 24, 2025): Swept path exhibit for Fire truck dated March 11, 2025, indicates wide sweeps requiring entire driveway width for Site access or egress; no modeling is provided for Myrtle Street right-turn egress (a movement required if concurrent/subsequent response is required to points north of the Site). Encroachment into opposing driveway travel lanes is not consistent with requirements under the NFPA 1 and the Massachusetts Amendments (527 CMR 1.0 Chapter 18) for travel in opposing lanes. Modification of driveway design per Comment 3b and Comment 12e is recommended to properly accommodate fire apparatus vehicle sweeps, reinforce turn restrictions (Main Street driveway) and maximize available intersection sight lines (Myrtle Street).*

**Proponent Response April 1, 2025:**

Please find attached the SWEPT Path Analysis marked as Exhibits B, C, and D...The analysis also illustrates that all of the various vehicles discussed during the public hearing process can safely navigate into, through, and exit all drive aisles and points of egress.

*Final Comment: A review of the AutoTurn exhibits (Single Unit 30, Single Unit 40, and Ladder Truck) indicate that the current design would not properly accommodate fire apparatus and service vehicle swept paths without encroaching into opposing travel lanes at Myrtle Street. Likewise, modification of the Main Street driveway geometry is necessary to properly accommodate vehicle sweeps. Additional input by Fire Department also requires accommodation for emergency vehicle (tower vehicle and ambulance) left-turn existing movement onto Main Street. Refer to attached redline plans prepared by MDM which*

*suggest (in concept form) the geometric changes necessary to address vehicle swept path movements and Fire Department maneuvering requirements. Design modifications include wider driveway lanes at Main Street with additional scored concrete panels and adjusted curb radii. The Myrtle Street driveway design modification include shifting the driveway alignment north with enlarged curb radius to accommodate right-turn movements by service and emergency apparatus. Shifting the Myrtle Street driveway alignment north would have the added advantage of increasing sight distance to Main Street by approximately 20-30 feet, thereby ensuring that more than the absolute minimum SSD criteria may be met for the driveway.*

**Comment 12(c): Swept Path Modeling – Service Vehicles**

*Original Comment: Provide swept path analysis/modeling for refuse vehicles to/from designated dumpster areas and for service/delivery vehicles for the commercial building.*

Proponent Response: A vehicle turning analysis for an SU-30 and an SU-40 design vehicle for the proposed dumpster areas and the location of service/delivery for the commercial building. This will be provided as part of the updated Site Plans under separate cover.

*Supplemental Comment (March 24, 2025): Driveway designs must be modified at the Myrtle Street and Main Street south driveway to eliminate opposing lane encroachments including (in the case of Myrtle Street) encroachment into Myrtle Street southbound lane for right-turn exiting movements.*

*Vehicles used for move-in/move-out are assumed as SU-30 design vehicles which Proponent should expressly acknowledge with tenants before reserving loading area space prior to move-in/move-out; as per comment 12d, additional expanded loading areas are recommended to properly accommodate these vehicle types.*

*Final Comment: A review of the AutoTurn exhibits for service vehicles (Single Unit 30 and Single Unit 40) indicate that the current design would not properly accommodate service vehicle swept paths without encroaching into opposing travel lanes for movements into and out of the Driveways. MDM recommends modification to both driveways to accommodate the service vehicles for the Site. Refer to Comments 3(b) and 12(b) for detailed commentary. Refer to Comment 12(d) for recommendations relative to move-in/move-out vehicle staging.*

**Comment 12(d): Move-In Vehicle Staging**

*Original Comment: Provide clarification of where tenant move-in/move-out trucks (typically SU-30 design vehicles or equivalent) can be staged/parked within the Site in a manner that does not impair circulation or impact parking spaces.*

*Proponent Response: Tenant moves will be coordinated with the property manager and scheduled in advance. Tenants will be informed of the location for moving vehicle staging. In addition to the use of parking spaces for smaller moving vehicles, a loading area is located adjacent to the garage driveway to the rear of the building.*

*Supplemental Comment (March 24, 2025): Submitted Parking/Loading/Bike Storage Exhibit identifies a small loading area near the garage entrance for move-in vehicle staging. This limited area (approximately 26 feet in length) would only nominally accommodate a single "box truck" vehicle with no provision for truck ramp. The lack of reasonable working area could impact site circulation lanes; likewise, there is no accommodation of more than a single move-in/move-out at any given time. MDM recommends that Proponent consider an expanded loading zone/locations for move-in/move-out use that can accommodate up to two (2) concurrently parked "box truck" type vehicles with adequate area for ramps and circulation. This may be achieved by designating the formal loading bay (by advance tenant reservation) as one move-in vehicle location in combination with an expanded surface loading area near the garage entrance, or expanded loading area near the garage entrance. Management of tenant move-in/move-out should be subject to prior notice/reservation of loading area by tenants so as to avoid potential circulation impacts at the property which would present a safety concern.*

*Final Comment: The staging area on current plans is limited to a 36 foot zone near the rear parking garage entrance, which is not of sufficient length to accommodate extension of a rear loading ramp from a SU-30 type vehicle. Provision of an expanded loading area behind the building is recommended that may be achieved by actively managing/reserving parking spaces adjacent to the loading area (spaces 52-61 on the Parking Allocation Plan) for loading vehicle use during non-peak parking demand periods.*

**Comment 12(e): Myrtle Street Driveway Design**

*Original Comment: Skewed alignment of the proposed driveway at Myrtle Street may require adjustment to curb radii to accommodate delivery, move-in or service vehicles so as to avoid encroachment into southbound Myrtle Street traffic. Proponent to confirm or consider restriction on the use of this driveway by non-passenger vehicle types with appropriate signs and markings.*

Proponent Response: The Myrtle Street Project site driveway has been designed to accommodate the turning and maneuvering requirements of delivery vehicles and the Ashland Fire Department design vehicle. Delivery vehicles will service the Project during non-peak hours and, as such, conflicts with vehicles exiting the driveway will be limited if any.

*Supplemental Comment (March 24, 2025): MDM does not concur that the driveway as proposed meets applicable design requirements for service, delivery, move-in or fire apparatus maneuvering whether these movements occur peak or non-peak. The skewed driveway alignment requires for each of these vehicle types a wide sweep into the opposing travel lane of Myrtle Street or (for entering movements) a wide sweep into the exiting lane of the driveway. This presents a significant safety concern that must be addressed by modifying the driveway alignment and/or adjusting curb radii so that movements do not impact opposing travel. See attached swept path exhibits which illustrate swept paths for various vehicle types based on currently proposed driveway design.*

*The Myrtle Street driveway will serve as a primary driveway for the Site given the left-turn restrictions at the Main Street driveway. Based on discussion with the Ashland Fire Department, this driveway will also serve as the sole means of egress for fire apparatus that would need to return to the downtown station after a response or, alternatively, would need to use the driveway for concurrent/subsequent response for other neighborhood locations north of the Site. Accordingly, it is imperative that the design of the driveway properly accommodate vehicle swept paths and maximize sight lines/driveway visibility to ensure safe and efficient maneuvering by fire apparatus at this location.*

***Final Comment: Further adjustment of the Myrtle Street driveway is necessary per Comment 12(b) to accommodate fire apparatus; a further shift of the driveway north (away from Main Street) would increase sight lines by another 20 to 30 feet, thereby ensuring that more than the absolute minimum SSD criteria may be met for the driveway.***

**Comment 12(g): Myrtle Street Driveway Sight Lines**

*Original Comment: The proposed retaining wall and fence to be situated proximate to the proposed public plaza will require modification and possible relocation within the Project site ensure sight line criteria are achieved.*

Proponent Response: The proposed retaining wall has been relocated outside of the sight triangle area of the Myrtle Street Project site driveway. This is shown on updated Landscape Plan that is included as an attachment.

*Supplemental Comment (March 24, 2025): Site Plans as updated through March 12, 2025 (Sheet C-301) depict sight line triangles for the Myrtle Street driveway based on adjusted wall location, indicating approaching vehicles will have approximately 200 feet of available stopping sight distance (SSD) – a*

*criteria that only “exactly” meets the absolute minimum intersection sight line criteria for measured (85<sup>th</sup> percentile) travel speeds. We note the importance of maximizing available sight lines at this driveway as it will serve as the primary site driveway for the development and associated service and emergency response vehicles. We therefore advise Proponent to adjust driveway geometry to properly accommodate vehicle sweeps per Comment 12(e) and further modify wall location to maximize sight lines with the goal of achieving sight lines that are as close to recommended ideal distance as possible. Preliminary assessment by MDM indicates that change in driveway alignment in combination with wall adjustment may improve intersection distance to 260 feet or more which is more in line with recommended (ideal) intersection sight distance of 290 feet.*

*MDM Final Comment: Further adjustment of the Myrtle Street driveway is necessary per Comment 12(b) to accommodate fire apparatus; a further shift of the driveway north (away from Main Street) would increase sight lines by another 20 to 30 feet, thereby ensuring that more than the absolute minimum SSD criteria may be met for the driveway.*

**Comment 13 (NEW): Myrtle Street Truck Exclusion**

*During the course of ZBA review of the project clarification was sought regarding truck exclusion for Myrtle Street and how this relates to the project site and use of commercial vehicles to/from the Myrtle Street driveway. MDM has confirmed that a Heavy Commercial Vehicle Exclusion (“HCVE”) has been established for the Myrtle Street corridor through MassDOT Traffic Regulation Permit B-1854 a of June 28, 1973 (Main Street to Framingham municipal boundary). A copy of the Traffic Regulation Permit B-1854 is attached for reference.*

*MDM notes that per Massachusetts Amendments to the Manual on Uniform Traffic Control Devices (MUTCD), “Exclusions shall not apply to heavy commercial vehicles going to or coming from placed upon the specific roadway for the purposes of making delivery of goods, materials or merchandise to of similar collection from abutting land or buildings of adjacent roadways to which access cannot otherwise be gained; or to vehicles used in connection with the construction, maintenance and repair of said streets or public utilities therein; or to federal, Sate, Municipal or public service corporation owned vehicles; or to registered farm vehicles”.*

*In summary, while a truck exclusion exists for the Myrtle Street corridor, use of the Myrtle Street driveway or the corridor generally by commercial vehicles servicing the site inclusive of deliveries and tenant “move-in/move-out” vehicles are allowed per Massachusetts amendments to the MUTCD. Accordingly, driveway design must accommodate such vehicle swept path requirements as indicated and outlined in Comment 3(b) which Proponent needs to address in updated design.*

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MDM appreciates the opportunity to provide Transportation Planning & Engineering Services to the Town of Ashland and look forward to discussing our findings at an upcoming Zoning Board of Appeals hearing. If you have any questions or concerns, please feel free to contact this office.

Sincerely,

A handwritten signature in blue ink, reading "Robert J. Michaud". The signature is fluid and cursive, with a large loop at the end of the last name.

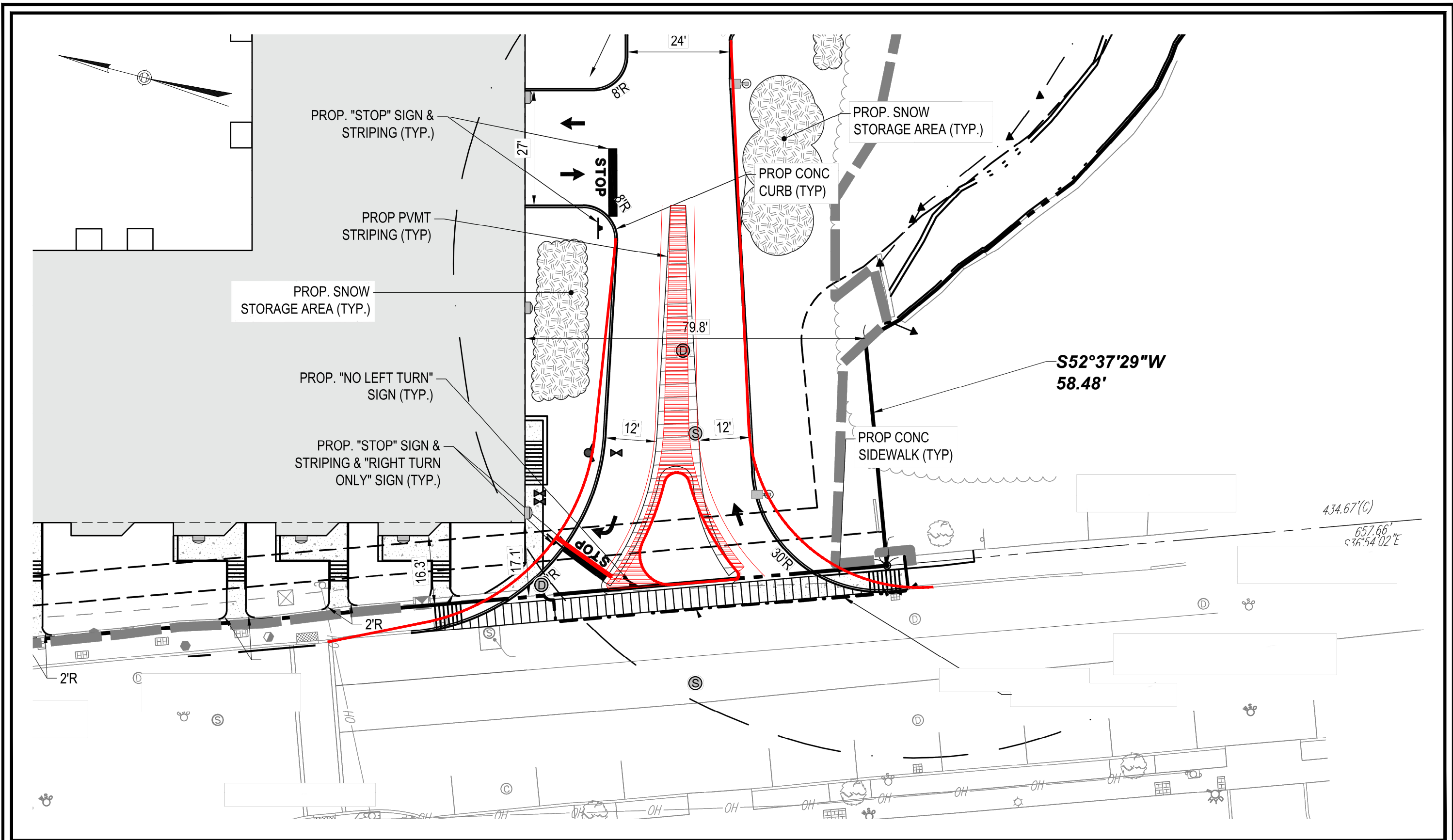
Robert J. Michaud, P.E.  
Managing Principal

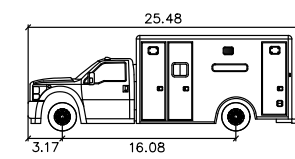
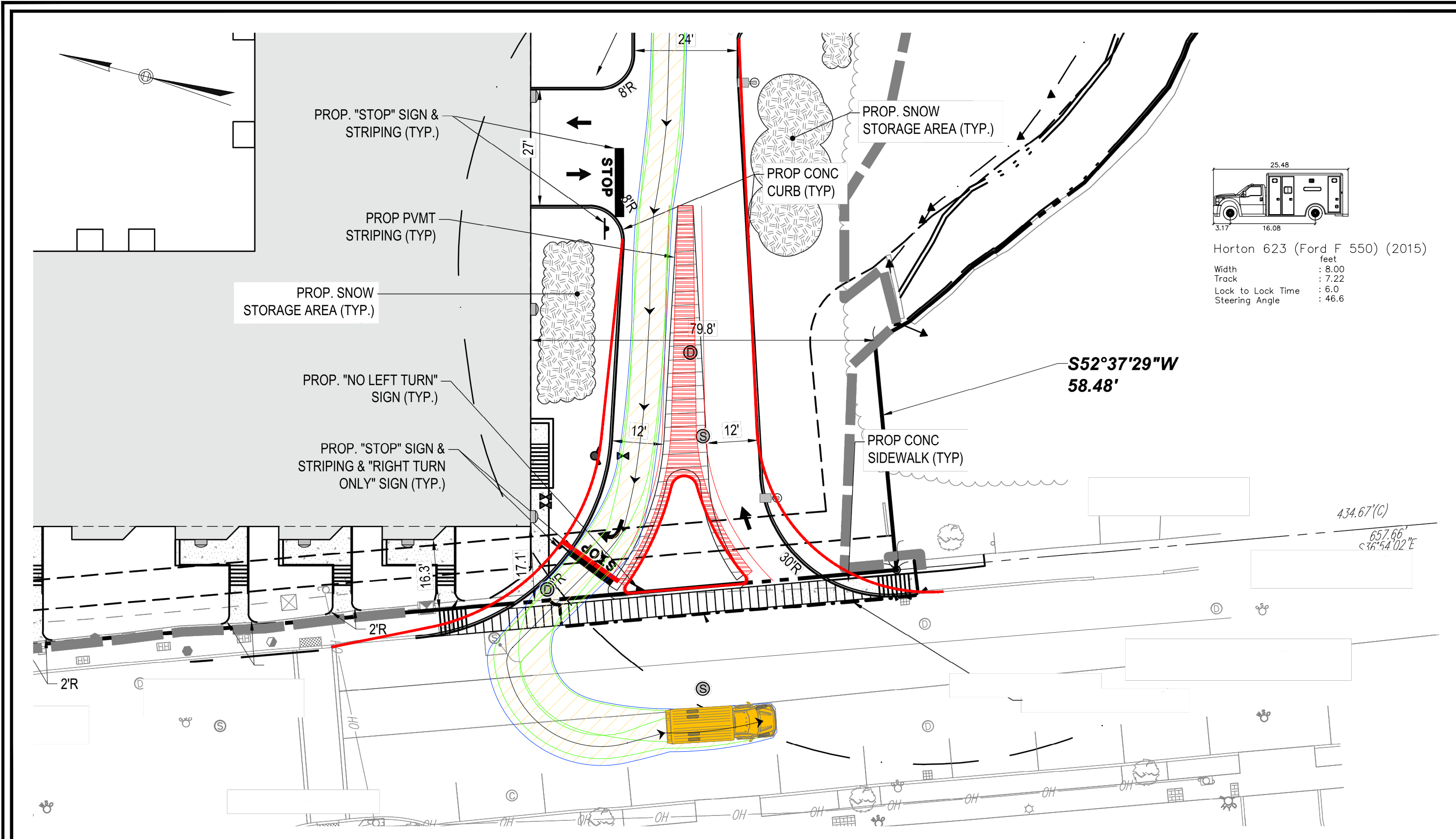
MDM

# Attachments

- AutoTurn Swept path Modeling Examples – Main Street and Myrtle Street Driveways
- Sanctuary Parking Analysis Spreadsheets by VAI 2-24-25 (Average Peak Demand) and 4-15-25 (85<sup>th</sup> Percentile Demand)
- Myrtle Street HCVE Traffic Regulation Permit B-1854

## **AutoTurn Swept Path Modeling Examples**

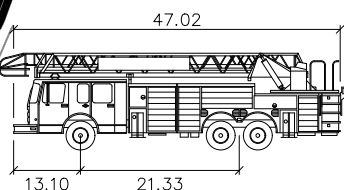
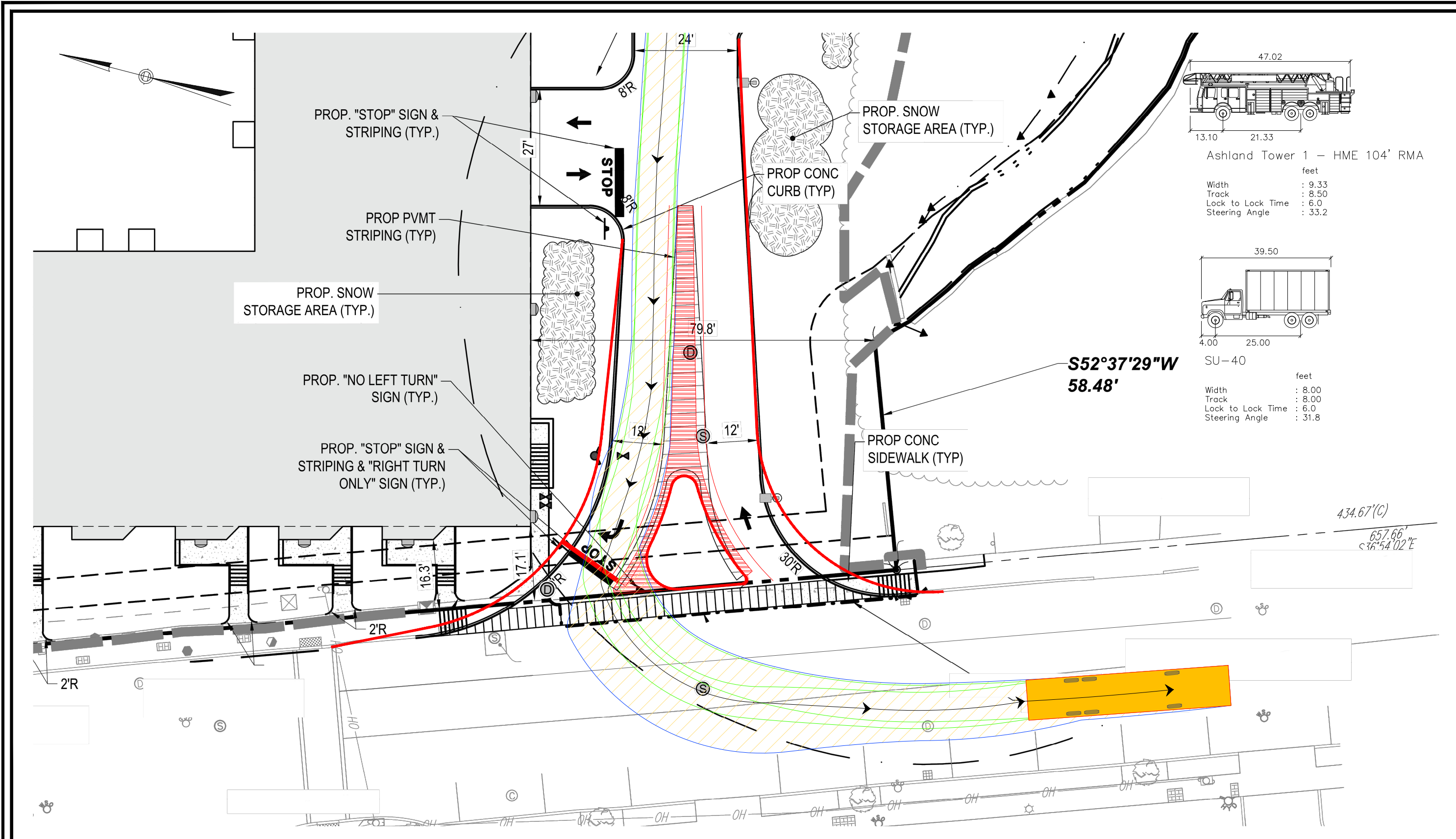




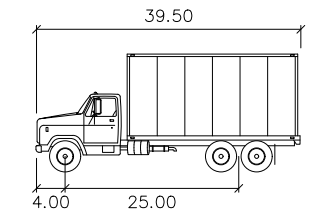
Horton 623 (Ford F 550) (2015)  
 feet  
 Width : 8.00  
 Track : 7.22  
 Lock to Lock Time : 6.0  
 Steering Angle : 46.6

**S52°37'29"W**  
**58.48'**

434.67'(C)  
 657.66'  
 S36°54'02"E



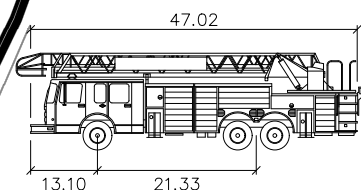
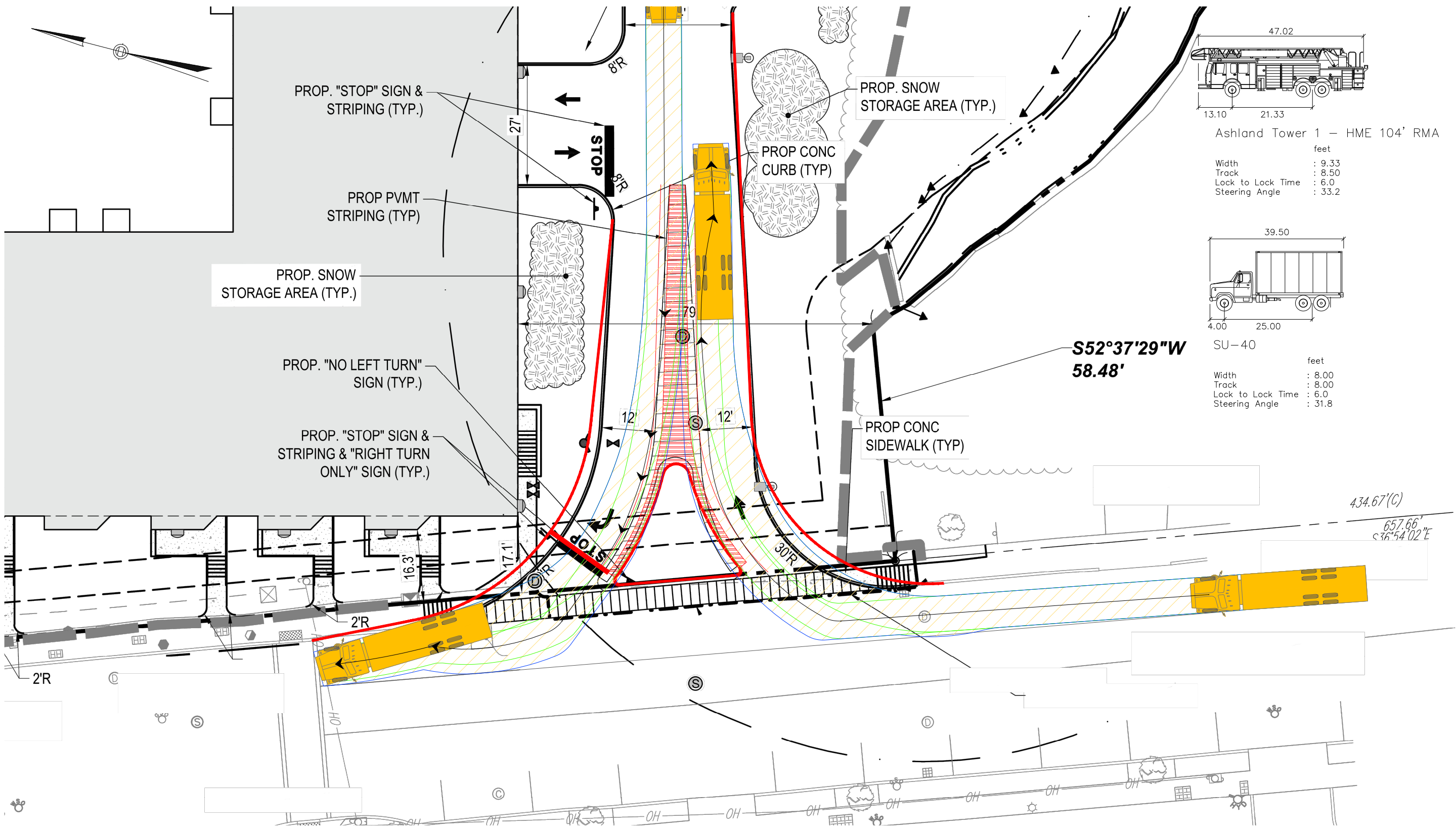
Ashland Tower 1 - HME 104' RMA  
 feet  
 Width : 9.33  
 Track : 8.50  
 Lock to Lock Time : 6.0  
 Steering Angle : 33.2



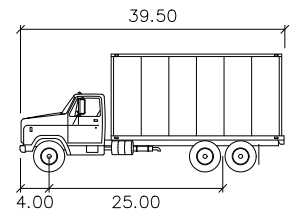
SU-40  
 feet  
 Width : 8.00  
 Track : 8.00  
 Lock to Lock Time : 6.0  
 Steering Angle : 31.8

**S52°37'29"W**  
**58.48'**

434.67'(C)  
 657.66'  
 S36°54'02"E



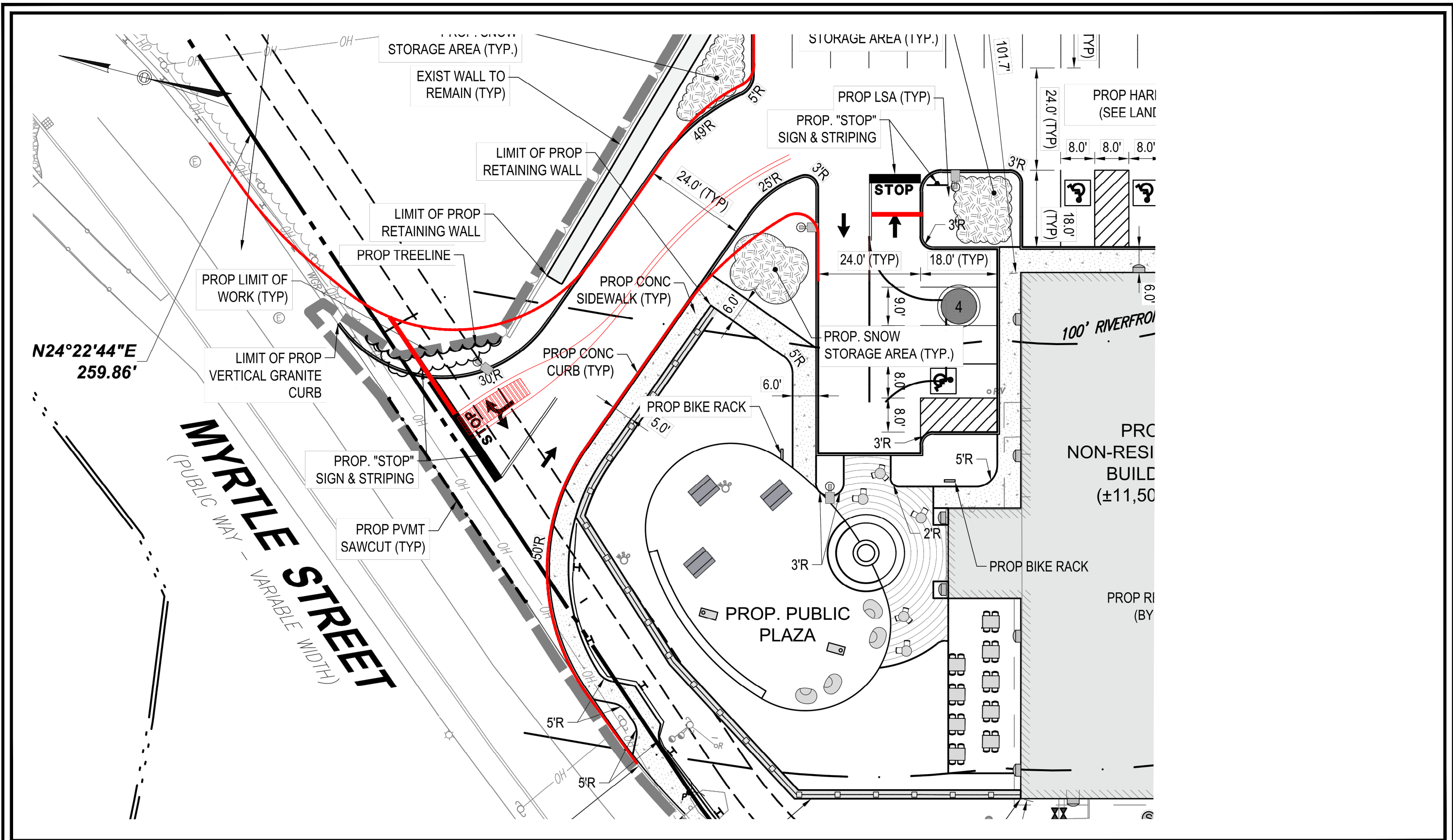
Ashland Tower 1 - HME 104' RMA  
 feet  
 Width : 9.33  
 Track : 8.50  
 Lock to Lock Time : 6.0  
 Steering Angle : 33.2



SU-40  
 feet  
 Width : 8.00  
 Track : 8.00  
 Lock to Lock Time : 6.0  
 Steering Angle : 31.8

**S52°37'29"W**  
**58.48'**

434.67'(C)  
 657.66'  
 S36°54'02"E







## **Sanctuary Parking Analysis Spreadsheets**

**The Sanctuary at Ashland Mills (9837)**

**Shared Parking Analysis**

24-Feb-25

Land Use	Size	Variable	Ave. Peak Demand	Peak Demand
<i>Residential</i>	250	units	1.23	308
<i>Retail</i>	6,500	sf	2.79	19
<i>Restaurant</i>	5,000	sf	8.34	42

Hour Beginning	Residential		Retail		Restaurant		Total
	% of Peak	Demand	% of Peak	Demand	% of Peak	Demand	
12:00 - 4:00 AM	100%	308	0%	0	0%	0	308
5:00	96%	296	0%	0	0%	0	296
6:00	86%	265	0%	0	0%	0	265
7:00	77%	237	0%	0	0%	0	237
8:00	66%	203	19%	4	64%	27	234
9:00	60%	185	33%	7	74%	31	223
10:00	57%	176	47%	9	82%	35	220
11:00	55%	170	55%	11	89%	38	219
12:00	52%	160	89%	17	100%	42	219
1:00	50%	154	100%	19	86%	36	209
2:00	52%	160	73%	14	57%	24	198
3:00	51%	157	73%	14	44%	19	190
4:00	57%	176	66%	13	39%	17	206
5:00	62%	191	70%	14	62%	26	231
6:00	65%	200	75%	15	73%	31	246
7:00	68%	210	70%	14	95%	40	264
8:00	75%	231	54%	11	76%	32	274
9:00	82%	253	48%	10	0%	0	263
10:00	87%	268	0%	0	0%	0	268
11:00	91%	280	0%	0	0%	0	280

**The Sanctuary at Ashland Mills (9837)**  
**Shared Parking Analysis - 85th Percentile Peak Parking Demand Values**  
**15-Apr-25**

Land Use	Size	Variable	85th Percentile Peak Demand	Peak Demand
<i>Residential</i>	250	units	1.45	363
<i>Retail</i>	6,500	sf	4.44	29
<i>Restaurant</i>	5,000	sf	13.61	68

Hour Beginning	Residential		Retail		Restaurant		Total
	% of Peak	Demand	% of Peak	Demand	% of Peak	Demand	
12:00 - 4:00 AM	100%	363	0%	0	0%	0	363
5:00	96%	348	0%	0	0%	0	348
6:00	86%	312	0%	0	0%	0	312
7:00	77%	280	0%	0	0%	0	280
8:00	66%	240	19%	6	64%	44	290
9:00	60%	218	33%	10	74%	51	279
10:00	57%	207	47%	14	82%	56	277
11:00	55%	200	55%	16	89%	61	277
12:00	52%	189	89%	26	100%	68	283
1:00	50%	182	100%	29	86%	59	270
2:00	52%	189	73%	22	57%	39	250
3:00	51%	185	73%	22	44%	30	237
4:00	57%	207	66%	20	39%	27	254
5:00	62%	225	70%	21	62%	43	289
6:00	65%	236	75%	22	73%	50	308
7:00	68%	247	70%	21	95%	65	333
8:00	75%	272	54%	16	76%	52	340
9:00	82%	298	48%	14	0%	0	312
10:00	87%	316	0%	0	0%	0	316
11:00	91%	330	0%	0	0%	0	330

**Myrtle Street HCVE Traffic Regulation Permit B-1854**

The Commonwealth of Massachusetts  
DEPARTMENT OF PUBLIC WORKS  
100 NASHUA STREET, BOSTON



City or town..... **ASHLAND**  
Date **June 28,**.....19**73** Permit No. **B-1054**

DEFINITIONS - HEAVY COMMERCIAL VEHICLE EXCLUSION

TRAFFIC REGULATION PERMIT

Under authority of Chapter.....**85**.....Section...**2**.....of the General Laws, Tercentenary Edition, the Department of Public Works, hereby approves the **Rules and Orders**.....made by the **Board of Selectmen** of **Ashland**.....on **April 10, 1973**.....with such stipulations and exceptions, if any, as are noted herein.

The validity of this permit is contingent upon the conformance of the signs, erected or used in connection with **these rules and orders**.....with the standards prescribed by the Department of Public Works.

FOR THE DEPARTMENT OF PUBLIC WORKS

By

*V. J. Cantone*  
**V. J. Cantone, P.E.**  
**Traffic Engineer**

"Voted: That the Traffic Rules and Orders of the Town of Ashland adopted by the Board of Selectmen September 30, 1937 are hereby amended as follows:

By adding at the end of Article I, the following new definitions:

"Commercial Vehicle" Any vehicle being used in the transportation of goods, wares or merchandise for commercial purposes.

"Heavy Commercial Vehicles: Any commercial vehicle of two and one-half (2½) tons capacity or over.

By adding at the end of Article VII, the following new Section:

SECTION 17 OPERATION OF HEAVY COMMERCIAL VEHICLES

The use and operation of heavy commercial vehicles, having a carrying capacity of more than two and one-half tons, are hereby restricted on the following named streets, or parts thereof, and in the manner outlined and during the period or time set forth:

Myrtle Street - Between Main Street and the Framingham Town line during twenty-four hours of every day.

The alternate route shall be via Main Street, Route 135, Fountain Street, Framingham and Dudley Road, Framingham.

Exemptions: Part 1 of this Section shall not apply to heavy commercial vehicles going to or coming from places upon said streets for the purpose of making deliveries of goods, materials, or merchandise to or similar collections from abutting land or buildings or adjoining streets or ways to which access cannot otherwise be gained; or to vehicles used in connection with the construction, maintenance and repair of said streets or public utilities therein; or to Federal, State, Municipal or public service corporation owned vehicles.

Part 1 of this Section shall be effective only during such times as sufficient official signs are erected and maintained setting forth its provision.

Date of Passage April 10, 1973

ASHLAND BOARD OF SELECTMEN

John P. Dakai  
John P. Dakai

Richard J. Fannon  
Richard J. Fannon

Arnold R. Baker  
Arnold R. Baker

Attest of the Town Clerk,

Winston E. Gouzoules  
Winston E. Gouzoules