



STRATEGIC LAND VENTURES

May 5th, 2025

John F. Trefethen
Chair, Ashland Zoning Board of Appeals
101 Main Street
Ashland, MA 01721

Re: Response to MDM Peer Review Letter Dated April 16th 2025

Dear Mr. Chairman:

Please consider this document our formal response to the MDM peer review letter dated April 16th 2025. At this juncture, we believe we have exhaustively responded to every request issued by MDM over the duration of the public hearing.

As part of this submittal, we have included the following exhibits and attachments:

1. Exhibit A: SWEPT Path Analysis prepared by Bohler Engineering
2. Exhibit B: Updated Civil Engineering plan set prepared by Bohler Engineering
3. Exhibit C: Parking Narrative
4. Exhibit D: Color Coded Parking Plan

On the following pages, we have embedded our responses directly within the comments/recommendations issued by MDM in its peer review letter. All NEW comments provided by we as the Applicant are represented in bold red text and dated May 5th 2025.

We appreciate your attention to this application. We look forward to discussing these changes at the public hearing on May 13th 2025.

Sincerely,

Geoffrey Engler
SLV Ashland, LLC



STRATEGIC LAND VENTURES

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.



STRATEGIC LAND VENTURES

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.

Applicant Final Comment (May 5th 2025): As previously identified by MDM, the Myrtle Street driveway provides the required sight distance for safe operation. That being said, the driveway on Myrtle Street has been redesigned to increase the sight distance by a minimum of 10' beyond the minimum required distance. The Myrtle Street entrance has also been redesigned to accommodate fire apparatus and delivery vehicle turning movements; with no truck turning movements requiring wide swing into opposite travel lanes (see SWEPT Path Analysis as Exhibit A). MDM's previous mark-ups and recommendations did not take into consideration the need to NOT



STRATEGIC LAND VENTURES

impact the existing flood wall or applicable DEP requirements requiring a minimum compensatory flood storage. Respectfully, we believe MDM representations that additional 20' to 30' of sight distance were available through various redesign possibilities are not accurate or feasible when considering ALL applicable requirements and existing conditions. With that said, we are happy we are able to provide the additional 10' of sight distance while accommodating all of the necessary truck turning movements. We have studied this intersection exhaustively and we maintain the current design provides the best possible outcome, and meets all applicable standards.

Lastly, to meet MDM and Fire Department requests, a utility pole currently located in the Town Right of Way will need to be relocated. This pole relocation will come at a significant expense to us as the Applicant. Moreover, the timing and process for the pole relocation is largely out of our control and determined by the utility company exclusively. We will work with ZBA Counsel and the Town DPW to expedite the pole relocation. However, in no circumstance can we agree to a condition in the Comprehensive Permit that would require the pole relocation as a prerequisite to a certificate of occupancy. This prerequisite would be a non-starter for us; regardless of the pole relocation, we will have a primary entrance on Main Street that can safely accommodate all resident vehicles and all emergency vehicles as well. We will work with the ZBA to make sure these considerations are appropriately reflected in the Comprehensive Permit Decision and will demonstrate timely and best efforts to relocate the utility pole in a timely manner.

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



STRATEGIC LAND VENTURES

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.

Applicant Final Comment (May 5th 2025): See previous response.

The driveway on Myrtle Street has been redesigned to increase sight distance and accommodate fire apparatus and delivery vehicle turning movements, including left hand turns for fire and ambulance vehicles.



STRATEGIC LAND VENTURES

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



STRATEGIC LAND VENTURES

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 (85th 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.



STRATEGIC LAND VENTURES

- 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.*



STRATEGIC LAND VENTURES

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.*

Applicant Final Comment (May 5th 2025):

1. **The Applicant has resubmitted a color-coded parking plan (Exhibit C). The parking plan reconciles to the final parking space total (362) represented on the updated site plan. There was a slight reduction in spaces to accommodate all of the various requests issued by MDM and Hancock Associates including more generously sized loading zones, a movement of the commercial dumpster, etc. The total number of 362 spaces still significantly exceeds the peak parking demands anticipated at the proposed development. And the Parking Narrative (included as Exhibit D) reflects that certain spaces can be restricted for the commercial use only during normal business hours.**
2. **See the attached parking narrative. In general, project parking will be consistently monitored by the management company as a standard management practice. No portion of the parking (garage or surface) will be overburdened by resident vehicles and will be managed by allocating parking space assignments strategically.**
3. **See the attached parking narrative**
4. **The Site Plan has been revised to expand the residential staging/moving area from 36' to a 54' loading space as the primary loading area. An additional auxiliary loading area has been included as well for a box truck if two move-ins were needing to occur simultaneously. This auxiliary area is also shown on the parking plan. We believe this to auxiliary loading area to be unnecessary but have reflected as much to address the comment by MDM.**
5. **See the attached parking narrative**



STRATEGIC LAND VENTURES

6. **The Applicant has not prepared the full signage package, which is commonly done much later in the process. However, we do not plan on restricting access to any vehicle types at either entrance as both entrances have been sufficiently redesigned to accommodate all vehicle types and turning movements.**

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.



STRATEGIC LAND VENTURES

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.

Applicant Final Comment (May 5th 2025):

Item Closed.

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.



STRATEGIC LAND VENTURES

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.

Applicant Final Comment (May 5th 2025):

The Site Plans have been revised to modify the sidewalk crossing at the driveways to elevate the pedestrian crossing to the extent feasible. The recent “Ashland Downtown Streetscape Improvement Project” utilized a variation of a MassDOT detail ‘701.1.2’. To be consistent we have added that detail to the Plan Set and have detailed the grading of the driveway on the grading sheets to the maximum 15% slope over the first 1.5’ of the driveway as measured from gutter line.

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).



STRATEGIC LAND VENTURES

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.

Applicant Final Comment (May 5th 2025): See previous response.

The driveway on Myrtle Street has been redesigned to increase sight distance and accommodate fire apparatus and delivery vehicle turning movements, including left hand turns for fire and ambulance vehicles. See Applicant response on Page #3.

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.



STRATEGIC LAND VENTURES

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.

Applicant Final Comment (May 5th 2025):

The driveway on Myrtle Street has been redesigned to increase sight distance and accommodate fire apparatus and delivery vehicle turning movements, including left hand turns for fire and ambulance vehicles. See Applicant response on Page #3.



STRATEGIC LAND VENTURES

The loading area for move-in/move-out vehicle staging has been increased from 36' to 54'. A swept path exhibit for the new trash enclosure location has also been provided.

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.*

Applicant Final Comment (May 5th 2025):

257 Hillside Avenue

Needham, MA 02494



STRATEGIC LAND VENTURES

The Site Plan has been revised to expand the residential staging/moving area from 36' to a 54' loading space as the primary loading area. An additional auxiliary loading area has been included as well for a box truck if there were two move-ins occurring simultaneously. This auxiliary area is shown on the parking plan. We believe this auxiliary loading area to be unnecessary but have reflected as much to address the comment by MDM.

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



STRATEGIC LAND VENTURES

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.

Applicant Final Comment (May 5th 2025):

See the original Applicant Comment on this issue on Page 3.

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 (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.

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



STRATEGIC LAND VENTURES

ensuring that more than the absolute minimum SSD criteria may be met for the driveway.

Applicant Final Comment (May 5th 2025):

See the original Applicant Comment on this issue on Page 3.

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.

Applicant Final Comment (May 5th 2025):

See the original Applicant Comment on this issue.