

May 6, 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 Applicant's response memoranda prepared by Applicant dated May 5, 2025 and review of updated Site plans prepared by Bohler Engineering dated April 29, 2025 and documentation provided by Applicant as identified below.

MDM finds that the Applicant's submitted materials address comments issued in our April 16, 2025 review letter. MDM defers to Town on specific sign package for wayfinding and parking space restrictions (commercial use) to be provided by Applicant prior to site occupancy.

### **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 -Revised*, prepared by SLV Ashland, LLC dated May 5, 2025.
- *The Sanctuary at Ashland Mills – Response to MDM Peer Review Letter of April 16, 2025*, prepared by SLV Ashland, LLC dated May 5, 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 April 29, 2025.
- *Truck Turns Exhibit A* prepared by Bohler Engineering dated April 17, 2025.
- *Preliminary Parking Allocation Plan, Exhibit D.*, prepared by SLV Ashland, LLC dated May 5, 2025.

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

*MDM Comment (April 16, 2025): 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 Response:**

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 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 we 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.

***Final Comment:** Updated driveway location/layout as presented in the Site Plans of April 29, 2025 provides adequate maneuvering area for emergency and service vehicles without encroachment on opposing travel lanes and provides stopping sight distance of approximately 230 feet for the Myrtle Street driveway (looking south) which exceeds minimum criteria of 200 feet (an approximate 30 foot increase over original layout). Utility pole relocation if not completed before site occupancy does not prevent Applicant from meeting applicable sight line criteria but may require placement of suitable barrier (bollard, jersey barrier or equivalent) to protect the pole until it is properly relocated. No further comment.*

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

*MDM Comment (April 16, 2025): 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 Response:**

The driveway on [Main 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.

***Final Comment:** Updated driveway location/layout as presented in the Site Plans of April 29, 2025 provides adequate maneuvering area for emergency and service vehicles without encroachment on*

*opposing travel lanes; the design also allows proper maneuvering area for ambulance and fire apparatus to conduct a left-hand turn if necessary onto Main Street by means of island adjustment and scored concrete panels at the driveway. No further comment.*

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

*MDM Comment (April 16, 2025): 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).*

Applicant Response:

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.

***Final Comment:*** *Revisions acknowledged; no further comment. MDM defers to Town on specific sign package for wayfinding and parking space restrictions (commercial use) to be provided by Applicant prior to site occupancy.*

- 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. Applicant 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.*

Applicant Response:

See the attached parking narrative. In general, project parking will be consistently monitored by the management company as a standard management practice. No

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portion of the parking (garage or surface) will be overburdened by resident vehicles and will be managed by allocating parking space assignments strategically.

**Final Comment:** *Parking management per submitted parking narrative acknowledged; MDM defers to Town on specific sign types and placement for commercial-use spaces and “short term” spaces along Main Street.*

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.*

Applicant Response: See the attached parking narrative.

**Final Comment:** *Expanded loading area acknowledged per submitted parking narrative and updated Site Plan of April 29, 2025. No further comment.*

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.*

Applicant Response:

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.

**Final Comment:** *Expanded loading area acknowledged per submitted parking narrative and updated Site Plan of April 29, 2025. No further comment.*

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.*

*Applicant Response: See the attached parking narrative. MDM defers to Town on specific sign package for wayfinding and parking space restrictions (commercial use) to be provided by Applicant prior to site occupancy.*

***Final Comment:*** *Parking management per submitted parking narrative acknowledged; MDM defers to Town on specific sign types and placement for commercial-use spaces and “short term” spaces along Main Street.*

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 Response:

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.

***Final Comment:*** *MDM defers to Town on specific wayfinding sign types and locations to be identified by Applicant in consultation with Town prior to site occupancy.*

## **GENERAL SITE PLAN COMMENTS - TRANSPORTATION**

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

*MDM Comment (April 16, 2205): 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 Response:

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.

***Final Comment:** Modified driveway apron/sidewalk crossing design acknowledged. No further comment.*

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

*MDM Comment (April 16, 2025): 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 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.

***Final Comment:** Updated driveway location/layout as presented in the Site Plans of April 29, 2025 provides adequate maneuvering area for emergency and service vehicles without encroachment on opposing travel lanes and provides stopping sight distance of approximately 230 feet for the Myrtle Street driveway (looking south) which exceeds minimum criteria of 200 feet (an approximate 30-foot increase over original layout). Utility pole relocation if not completed before site occupancy does not prevent Applicant from meeting applicable sight line criteria but may require placement of suitable barrier (bollard, jersey barrier or equivalent) to protect the pole until it is properly relocated. No further comment.*

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

*MDM Comment (April 16, 2025): 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 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.

***Final Comment:** Updated driveway designs per Site Plans of April 29, 2025 adequately address service and emergency vehicle maneuvering requirements; no further comment.*

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

*MDM Comment (April 16, 2025): 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 Response:

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.

*Final Comment: Expanded loading area acknowledged per submitted parking narrative and updated Site Plan of April 29, 2025. No further comment.*

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

*MDM Comment (April 16, 2025): 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.*

*Final Comment: Myrtle Street driveway design modified as presented in Comment 3(b) to address swept path impacts and improve sight distance; no further comment.*

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

*MDM Final Comment (April 16, 2025): 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.*

*Final Comment: Myrtle Street driveway design modified as presented in Comment 3(b) to address swept path impacts and improve sight distance; no further comment.*

**Comment 13 : Myrtle Street Truck Exclusion**

*MDM Comment (April 16, 2025): 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 tolfrom 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, State, 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 Applicant needs to address in updated design.*

*Final Comment: Myrtle Street driveway design modified as presented in Comment 3(b) to address swept path impacts and improve sight distance; no further comment.*

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 that reads "Robert J. Michaud". The signature is fluid and cursive, with the first name being the most prominent.

Robert J. Michaud, P.E.  
Managing Principal

MDM