ENVIRONMENTAL PARTNERS
— An Apex Company —

MEMORANDUM

Date: February 3, 2022

To Ms. Sue Brown, Town Planner
Town Hall
10 Central Street
Manchester-by-the-Sea, MA 01944

From Greg E. Lucas, PE, PTOE, RSP

CC James D. Fitzgerald, PE, LEED AP – EP, Director of Transportation
Zoning Board of Appeals – Manchester-by-the-Sea

Subject The Sanctuary at Manchester-by-the-Sea – Transportation Peer Review
Review of Response to Comments

Environmental Partners (EP) has reviewed the responses prepared by Vanasse & Associates, Inc. (VAI) to the review comments raised by EP in our Transportation Peer Review memorandum dated January 10, 2021for the proposed Multifamily Residential Development to be known as "The Sanctuary at Manchester-by-the-Sea", located on School Street in Manchester-by-the-Sea, MA. It is understood that the proposed project is an affordable housing development under the Chapter 40B state statute that allows local Zoning Board of Appeals approval with flexible rules if at least 20-25% of the units have long-term affordability restrictions.

EP is also in receipt of a response memo dated January 25, 2022 prepared by Embarc, the architect of record on the project. The Embarc memo indirectly addresses comments raised in EP's initial review.

EP has provided a response ("EP Response 2/2/2022") to each of the original EP comments ("EP Comment 1/10/2022") and subsequent VAI responses *("VAI Response 1/27/2022")* as outlined below. Where appropriate, Embarc responses have been noted ("*Embarc Response 1/25/2022*") in the comment resolution.

Project Description

Comment 1

EP Comment 1/10/2022:
The TIA identifies shared bicycle accommodations are provided on School Street and Pleasant Street. While shoulders of varying width are provided on School Street and bicycles are not

specifically prohibited, no specific accommodations are provided and shoulders in some instances are too narrow to provide comfortable accommodations for bicyclists. While the TIA is correct that shared traveled way accommodations exist, this should not be construed to mean that specific accommodations are provided for bicyclists.

VAI Response 1/27/2022:
No response required; VAI concurs that formal bicycle accommodations are not afforded along School Street.

EP Response 2/2/2022:
Clarification provided; **Comment 1 closed**.

Existing Traffic Data

Comment 2

EP Comment 1/10/2022:
The April 2020 "Guidance on Traffic Counting Data" published by MassDOT establishes a procedure by which 2019 data is considered current data. It is unclear how this data were "expanded" to 2021; additional detail and backup calculations should be provided.

VAI Response 1/27/2022:
A compounded annual traffic growth rate of 1.0 percent per year (consistent with the established growth rate in the December 2021 TIA) was applied to Annual Daily Traffic (ADT) obtained from MassDOT Continuous Count Station No. 35 for the month of November 2019 to establish November 2021 traffic volume conditions. The detailed calculations are attached.

EP Response 2/2/2022:
Information provided. We note that the application of a growth factor to the 2019 data unnecessary inflates data for the purposes of comparison of data pre-COVID and COVID-impacted; however, this results in a higher adjustment factor and a resultant more conservative approach when adjusting traffic volumes to account for the impacts of the pandemic. **Comment 2 closed**.

Comment 3

EP Comment 1/10/2022:
Backup data should be provided for the permanent count station referenced to determine if it is appropriate to apply the same adjustment factor to both weekday morning and weekday afternoon peak hours. It is understood that the pandemic has greatly affected work and travel patterns, and different adjustment factors by time of day may be appropriate.

VAI Response 1/27/2022:
The traffic count data from the MassDOT permanent traffic count station is attached.

EP Response 2/2/2022:
Information provided; **Comment 3 closed**.

Comment 4

EP Comment 1/10/2022:
Table 2 presents an unclear summary of existing traffic volumes using a mix of ATR data and TMC data at different locations. Daily traffic is taken from ATR data *south* of Atwater Avenue, while vehicle per hour data is taken from TMC data *north* of Atwater Avenue. EP recommends using adjusted hourly data from the ATR count for the peak hour values and calculation of K factor and directional distribution or using TMC data from the same location with respect to Atwater Avenue. We note that TMC data taken at this location results in higher adjusted hourly volumes of 723 for the weekday morning peak hour and 727 for the weekday afternoon peak hour.

VAI Response 1/27/2022:
Table 2R has been revised to present the ATR and TMC data for School Street south of Atwater Avenue. (See VAI response letter for revised table)

EP Response 2/2/2022:
Corrected table provided; **Comment 4 closed**.

Crash Data

Comment 5

EP Comment 1/10/2022:
Backup data has not been provided to support the crash data summary.

VAI Response 1/27/2022:
The MassDOT crash data for the study area is attached.

EP Response 2/2/2022:
Information provided; **Comment 5 closed**.

Comment 6

EP Comment 1/10/2022:
A corridor crash analysis should be provided for the School Street corridor to identify mid-block and minor intersection crashes within the study area.

VAI Response 1/27/2022:
As requested by EP, motor vehicle crash information was obtained for the School Street corridor between Old School Street and Central Street/Union Street (Route 127) from the MassDOT Highway Division Safety Management/Traffic Operations Unit for the most recent five-year period available (2015 though 2019, inclusive) in order to examine motor vehicle crash trends occurring within the study area. For the purpose of this evaluation, the School Street corridor was separated into two (2) roadway segments: Segment 1 - between Old School Street and the Route 128 southbound ramps; Segment 2 – between the Route 128 northbound ramps and Route 127. The data is summarized by for each roadway segment by crash type, severity, roadway and weather conditions, and day of occurrence, and presented in Table 4A.

As can be seen in Table 4A, 10 motor vehicle crashes were reported to have occurred along School Street Segment 1 (between Old School Street and the Route 128 southbound ramps) over the five-year review period, or an average of 2.0 crashes per year, the majority of which occurred on a weekday, during

daylight, under clear weather conditions, and were reported as angle-type collisions that occurred at an intersection, with the severity type evenly split between property damage and personal injury.

Thirty-one motor vehicle crashes were reported to have occurred along School Street Segment 2 (between the Route 128 northbound ramps and Route 127) over the five-year review period, or an average of 6.2 crashes per year, the majority of which occurred on a weekday, during daylight, under clear weather conditions, and were reported as angle-type collisions that occurred at an intersection or sideswipe crashes that resulted in property damage only.

The calculated motor vehicle crash rate for both School Street roadway segments were found to be below MassDOT statewide and District average crash rates for urban minor arterial roadways, the functional classification for School Street. In addition, a review of the MassDOT statewide High Crash Location List indicated that there are no locations within the Town of Manchester-by-the-Sea that are included on MassDOT's Highway Safety Improvement Program (HSIP) listing as high crash locations. The detailed MassDOT Crash Rate Worksheets are attached. (see VAI response letter for revised table)

EP Response 2/2/2022:
Information provided. EP confirms that the corridor crash rates are below Statewide and District average crash rates for similarly classified roadways. **Comment 6 closed**.

Trip Distribution

Comment 7

EP Comment 1/10/2022:
A review of backup data in the Appendix revealed that distribution percentages for Route 127 are transposed in Figure 7. Backup data suggests that 6% travel to/from Central Street and 3% via Union Street. This correction has a negligible impact, affecting one trip as shown in Figure 8.

VAI Response 1/27/2022:
Figure 7 has been updated to reflect 6 percent of Project-related traffic using Central Street and 3 percent using Union Street. This change resulted in one (1) trip being removed from Union Street and added to Central Street during the weekday morning peak hour, and two (2) trips being removed from Union Street and added to Central Street during the weekday evening peak hour. The revised figures are attached.

EP Response 2/2/2022:
Clarification and corrected figure provided; **Comment 7 closed**.

Future Traffic Volumes – Build Condition

Comment 8

EP Comment 1/10/2022:
EP requests revisions to Table 6 summarizing all projected traffic volume increases resulting from expected Project-generated traffic.

VAI Response 1/27/2022:
Table 6A (an expansion of Table 6) shows the traffic volume increases resulting from the Project between the study area intersections. By way of clarification as to the intent of Table 6; Table 6 is intended to illustrate the traffic volume increases resulting from the Project that occur external to the study area that

is assessed in the December 2021 TIA given that the direct impact of the Project is assessed within the study area. Mill Street has been removed from Table 6A as Project-related traffic was not assigned to this roadway. (See VAI response letter for revised table)

EP Response 2/2/2022:
Clarification and updated table provided. We note that on both a volume and percentage basis, the project impact is greatest for School Street between Atwater Avenue and Route 128 Southbound Ramps, where the project results in an increase of 7.8 and 9.4 percent over No-Build traffic volumes in the weekday morning and weekday evening peak hours, respectively.

Traffic Operations

Comment 9

EP Comment 1/10/2022:
Analysis results suggest that study area intersections are at or near capacity presently and in need of mitigation to support additional traffic load.

VAI Response 1/27/2022:
The Project includes measures that are intended to support improvements along School Street that are desirable and justified independent of the Project to address existing or predicted capacity constraints. The measures are proportionate to the identified impact of the Project and include the preparation of a study, conceptual design plans and associated cost estimates for improvements for the Route 128 north and southbound ramp intersections with School Street. With specific regard to the Project, the regulations under M.G.L. Chapter 40B and the related case law confirm that an Applicant is not expected to solve existing traffic issues, only to mitigate the incremental change that is associated with the development.

EP Response 2/2/2022:
The impact of the project as illustrated in Table 6A associated with comment 8 is notable. The suggested studies and conceptual design do not address construction of potential improvements, which would be required for project mitigation to be realized.

Comment 10

EP Comment 1/10/2022:
A review of Synchro analysis contained in the Appendix revealed transposed peak hour factors (PHFs) for the eastbound and westbound movements at the intersection of School Street, the Route 128 northbound ramps, and Mill Street in the weekday morning peak hour. EP notes that a reduction in PHF for the Route 128 northbound off-ramp will further increase delays reported for this critical approach to the intersection.

VAI Response 1/27/2022:
The PHFs for the identified movements at the School Street/Route 128 Northbound Ramps/Mill Street intersection were corrected for the weekday morning peak-hour and the associated traffic operations analyses were revised, the results of which are summarized in Table 8R with the detailed analysis results attached.

The correction of the PHF's resulted in a general increase in average motorist delay for the Route 128 northbound off-ramp that resulted in a corresponding increase in vehicle queuing of up to three (3)

vehicles for left-turn/through movements and up to one (1) vehicle for the right-turn movement under both No-Build and Build conditions. Project-related impacts at the intersection during the weekday morning peak-hour continue to be defined by an increase in motorist delay that resulted in a corresponding increase in vehicle queuing of up to two (2) vehicles.

EP Response 2/2/2022:
Information provided. The increases in delay and queue from the corrected analysis further confirm an intersection in need of mitigation to support additional traffic load.

Site Access

Comment 11

EP Comment 1/10/2022:
The offset distance of 135 feet between the proposed site driveway and Atwater Avenue introduces the potential for conflicts between turning vehicles between the two intersections. EP notes that the project site lot provides frontage along School Street in the vicinity of Atwater Avenue; the Applicant should provide justification as to why the site driveway was not located opposite Atwater Avenue.

VAI Response 1/27/2022:
The Project site driveway has been purposely located along School Street in order to: i) avoid a wetland resource area that is located opposite Atwater Avenue which prevents any disturbance and a defined riverfront area to the north of the current driveway location; and ii) to be sufficiently removed from Atwater Avenue so as to limit the interaction between the two intersections. As identified in the December 2021 TIA, lines of sight at the Project site driveway intersection exceed the recommended minimum distances for the intersection to operate in a safe and efficient manner.

EP Response 2/2/2022:
Clarification provided. EP confirms the presence of a wetland resource area that would require disturbance if the proposed site drive were to be located opposite Atwater Avenue. We note that the distance between the proposed site drive and Atwater Avenue is a function of the property size; additional offset could not be provided without acquiring additional property.

Comment 12

EP Comment 1/10/2022:
The length of the driveway well exceeds Zoning By-Law requirements. Section 6.2.8 of the by-laws states that common driveways should have a maximum length of 500 feet. The proposed site driveway is approximately 1,800 feet from School Street to the parking garage entrance.

VAI Response 1/27/2022:
The Fire Chief submitted a formal letter for the record dated January 21, 2022. The Chief confirmed that he has reviewed the design of the Project, including the Project site access and internal circulation, and has determined that the Project, as designed, provides the appropriate accommodations for fire protection and life safety access.

EP Response 2/2/2022:
EP has reviewed the letter dated January 21, 2022 from Chief Cleary as the Authority Having Jurisdiction (AHJ) determining that the proposed single driveway is acceptable. Comment 12 was

intended to note non-conformance with the Zoning By-Laws; the proposed response does not provide justification for this non-conforming design element, nor does it address whether alternative designs were considered which can provide conformance with Zoning By-Law requirements.

Comment 13

EP Comment 1/10/2022:
The site topography requires the driveway to wrap around the building, increasing access and response times for emergency vehicles. An additional emergency access drive should be considered.

VAI Response 1/27/2022:
The Fire Chief submitted a formal letter for the record dated January 21, 2022. The Chief confirmed that he has reviewed the design of the Project, including the Project site access and internal circulation, and has determined that the Project, as designed, provides the appropriate accommodations for fire protection and life safety access.

EP Response 2/2/2022:
EP has reviewed the letter dated January 21, 2022 from Chief Cleary as the Authority Having Jurisdiction (AHJ) determining that the proposed single driveway is acceptable. (See response to Comment 12 above.)

Parking

Comment 14

EP Comment 1/10/2022:
The proposed project is in deficit for proposed parking spaces in comparison with the Zoning By-Law requirements. Additional analysis must be provided to justify the proposed parking supply.

VAI Response 1/27/2022:
The Project will provide 242 parking spaces to support 136 residential units, or a parking ratio of 1.78 parking spaces per unit. This parking ratio exceeds the parking ratios for multifamily residential communities in similar settings and those documented by the Institute of Transportation Engineers (ITE). Both the ITE data and the parking demand observations indicate that the peak parking demand for a multifamily residential community ranges from 1.13 to 1.47 spaces per residential unit, with 1.5 parking spaces per unit the typical design value. The ITE parking demand data and parking observations conducted by VAI are attached.

For context, we offer the following as a brief list of the many examples of multifamily projects that provide a parking supply that is representative of the 1.5 parking space per unit parking ratio:

- *Waltham/Winter Street Residences: 315 units with 473 spaces (1.5 spaces/unit)*
- *Winchester/416 Cambridge Street: 96 units with 144 spaces (1.5 spaces/unit)*
- *Winchester/River Street Residences: 147 units with 225 spaces (1.53 spaces/unit)*
- *Needham/The Kendrick: 390 units with 585 spaces (1.5 spaces/unit)*
- *Hingham/The Cove: 220 units with 344 spaces (1.56 spaces per unit)*
- *Billerica/The Val: 200 units with 290 spaces (1.45 spaces per unit)*
- *Medway/Toll Residential: 190 units with 304 spaces (1.6 spaces per unit)*

EP Response 2/2/2022:
Information provided. EP confirms that the ITE *Parking Generation* manual provides data frequently referenced when contemplating proposed parking ratios of residential communities however continues to note the proposed parking does not meet the local Zoning By-Law requirements. EP also cautions that data provided by ITE is based on complexes of varying size with variances in bedrooms per unit as well as proximity to transit. EP requests additional data on the comparable sites provided, including total number of bedrooms, availability of transit, and proximity to transit. The proposed project is not served by transit; residents who patronize the MBTA commuter rail at the Manchester-by-the-Sea Station are still highly likely to drive to the station given the 1.7 mile distance to the station.

Comment 15

EP Comment 1/10/2022:
Proposed parking stall dimensions of 9 feet by 18 feet do not comply with Section 6.2.2 of the Zoning By-Law, which requires off-street parking spaces with minimum dimensions of 9 feet by 20 feet.

VAI Response 1/27/2022:
Please refer to the letter submitted by Embarc dated 1/21/2022 and titled "MBTS EP Letter Response" for a response specific to the parking space dimension.

Embarc Response 1/25/2022:
The applicant believes that the off-street parking stall dimensions at the Sanctuary at Manchester-by- the-Se, are appropriately sized at 9 feet in width and 18 feet in length. While all municipalities have their own parking standards, the 9x18 space size is arguably the most common throughout Massachusetts. In fact, a number of communities in Essex County utilize the 9x18 parking space size as their standard dimension, including Gloucester, Beverly, and Hamilton. Regardless, for a covered private parking garage, market metrics would indicate that a 9x18 space is appropriately dimensioned.

In terms of accessibility, the 9' width of our parking spaces exceeds the 8' minimum width required by the Massachusetts Architectural Access Board for accessible parking spaces.

In addition, 9x18 spaces can accommodate a broad range of needs and vehicles. For comparison:

- *Cadillac Escalade, one of the largest vehicles on the road: 212" long (17' – 8")*
- *Ford F-150, highest selling vehicle in the US: 209.3" long (17' – 5.3")*
  95.7" total width (7' - 11.7")
- *Honda Civic: 184" long (15' – 4")*
  71" wide (5' – 11")
- *Smart Car, at the smallest end of the spectrum: 106" long (8' – 9"), 75" wide (6' -3")*

Lastly, Environmental Partners has formally supported 8, and 8.5' wide parking spaces on other 40B projects, most recently in Brookline, MA.

EP Response 2/2/2022:
EP takes no exception to the information provided and confirms that a 9 foot by 18 foot parking stall is a typical parking stall dimension and a common standard throughout Massachusetts, including in

communities where EP has reviewed residential developments for municipal Boards. However, we continue to note that the proposed parking space size does not conform to this municipality's Zoning By-Law requirements.

Comment 16

EP Comment 1/10/2022:
Details should be provided regarding garage access and the parking supply expected to be available to visitors and service providers.

VAI Response 1/27/2022:
Please refer to the letter submitted by Embarc dated 1/21/2022 and titled "MBTS EP Letter Response" for a response specific to the parking space dimension.

Embarc Response 1/25/2022:
All visitors, guests, and service providers will approach the building via the 2-way entry drive. Guests will then have access to the 16 surface parking spaces provided adjacent to the main entry door of the building. These spaces are located proximate to the main entrance to the building and are easily visible and identifiable. Mail and package delivery, shuttle service, and moving vehicles will all have access to the loading area situated directly South of the main entry. All guest and service vehicles will have the ability to utilize the turn-around situated directly north of the amenity courtyard to change directions without the need of a U-turn.

Passenger pickup, via rideshare, Uber or private vehicle, will also utilize the loading zone adjacent to the front entry. This space is is sized to accommodate 1 box-truck vehicle or 2-regular size vehicles simultaneously.

Trash pickup will occur off the circular turn-around, which has ample room to facilitate a trash truck without negatively impacting any vehicles entering or exiting the parking garage. The covered garage parking area itself is restricted exclusively for residents of the development. Moreover, residents will have assigned parking spaces and will have familiarity with the location of their space(s) and the necessary turning movements.

EP Response 2/2/2022:
Information provided. The Applicant should provide information on guest parking from comparable sites cited in response to comment 14. Garaged parking may also need to be made available to guests if surface parking is occupied.

Evaluation of Recommendations

Comment 17

EP Comment 1/10/2022:
EP recommends additional commitment from the Proponent to fund design services for potential proposed improvements, which notably benefit Project access from the abutting highway.

VAI Response 1/27/2022:
The Project proponent has committed to conduct an improvement study for the Route 128 north and southbound ramp intersections with School Street that will include performing a detailed Traffic Signal Warrants Analysis (TSWA) in accordance with the methodology defined in the Manual on Uniform Traffic

Control Devices (MUTCD) and evaluating the reconfiguration of the intersections as modern roundabouts. The study will include the preparation of conceptual improvement plans depicting each of the improvement alternatives that are evaluated and the necessary information to allow the Town to apply for state funding for the recommended improvement strategy.

The Project proponent will consider providing a financial contribution to the Town for the design of the identified improvement measures in the context of the overall mitigation package for the Project, with said contribution to be proportionate to the incremental impact of the Project within the interchange area over No-Build conditions (i.e., a "fair-share" cost contribution).

EP Response 2/2/2022:
EP encourages the Applicant to engage with the Town to establish a "fair-share" cost contribution to potential roadway improvements in the near-term.

Comment 18

EP Comment 1/10/2022:
A review of site plans for the Project site shows no pedestrian or bicycle focused connections between the site and the study area roadways, limiting the effectiveness of TDM measures intended to promote pedestrian and bicycle activity in the area. EP recommends consideration of off-site pedestrian improvements, potentially in connection with intersection improvements to be considered at School Street and the Route 128 ramps. Additionally, focused pedestrian improvements at study area intersections would benefit residents and the abutting neighborhoods, specifically at the intersection of School Street and Pleasant Street, which serves pedestrian connections to Manchester Essex Regional Middle and High School.

VAI Response 1/27/2022:
The Project proponent will consider providing funds to the Town for pedestrian focused improvements at the study area intersections in the context of the overall mitigation package for the Project, with said contribution to be proportionate to the incremental impact of the Project within the interchange area over No-Build conditions (i.e., a "fair-share" cost contribution).

EP Response 2/2/2022:
EP encourages the Applicant to engage with the Town to establish a "fair-share" cost contribution to potential pedestrian-focused improvements in the near-term.

Comment 19

EP Comment 1/10/2022:
Off-site improvements should consider traffic calming elements to reduce travel speeds. Recorded speeds well exceed posted speed limits for the School Street corridor.

VAI Response 1/27/2022:
The Project proponent will consider the installation of traffic calming elements, including radar speed feedback signs along School Street, in the context of the overall mitigation package for the Project.

EP Response 2/2/2022:
EP encourages the Applicant to engage with the Town to establish proposed traffic calming elements in the near-term.

Evaluation of Requested Waivers

As requested by the Zoning Board of Appeals (ZBA) through the Town Planner, EP has provided an evaluation of waiver requests received by the Board in a document dated July 16, 2021. While specific responses were not provided by the Applicant team to EP's evaluation included in our January 10, 2022 memorandum, the evaluation has been updated in light of responses provided to related comments.

WAIVERS FROM ZONING BYLAW OF THE TOWN OF MANCHESTER-BY-THE-SEA FOR THE SANCTURAY AT SHINGLE HILL		
LOCAL REGULATION	**REQUIREMENT**	**PROPOSED**
1. **Section 4.4 –** Limited Commercial District (LCD) Use Regulations • Multi-family/unit Dwelling	Use(s) not allowed in the LCD	Waiver granted to allow the Multi-family/unit Dwelling, Accessory Uses, Leasing offices, covered parking and associated Amenity areas for residents
2. **Section 5.5 –** Building Height	2.5 Stories (Max.)	Three (3) Stories
3. **Section 5.7.1 –** Lot Width	500'	291.2' (Existing Non-Conforming)
4. **Section 5.7.3 –** Building Setback	All Structures shall be set back from any street at least one hundred and fifty (150) feet, and from any other lot line at least one hundred (100) feet.	Street setback = 207.4' Side setback = 84.1' Rear setback = 84.3'
5. **Section 6.2.2 –** Parking Space Dimension	Off-street parking spaces shall be designed with minimum dimensions of 9'x20'	Off-street parking spaces shall be designed with minimum dimensions of 9'x18' and minimum 23' access drive aisles.
6. **Section 6.2 –** Number of Parking Spaces	383 Required Parking Spaces (See Parking Table for breakdown)	236 (See Parking Table for breakdown)
7. **Section 6.2.6** – Parking Lot Plantings	Parking lots containing five (5) or more parking spaces shall have at least one (1) tree per five (5) parking spaces.	Minimum one (1) tree per five (5) surface parking spaces will be planted. Waiver requested to clarify this is not applicable to the structured parking garage stalls.
8. **Section 6.2.7** - Driveway/Curb Cut Permit	Requirement of Driveway/Curb Cut Permit from Planning Board	Waiver granted to from Curb Cut/Driveway permit from Planning Board.
9. **Section 6.5 -** Site Plan Review	Requirement that this project is subject to Site Plan Review by the Planning Board	Waiver granted from Site Plan Review by Planning Board
10. **Section 6.9** – Site Plan Review Special Permit	Requirement that this project is subject to Site Plan Review Special	Waiver granted from Site Plan Review Special Permit by Planning Board

Waiver 1: In general, the Limited Commercial District (LCD) includes the portion of the Town north of the Route 128 highway, with Residential uses abutting this zone south of the highway. EP is not aware of any traffic-related adverse effect from allowing a multi-family residential use in the LCD.

Waivers 2 through 4: These waivers generally involve design elements that contribute to the massing and density of the proposed structure. Waivers 2 and 4 request relief from elements that would require revisions to reduce the size and density of the building if waivers were not granted. Waiver 3 does note the existing non-conforming status of the lot width, but confirms the disassociation between the site density and what is intended by the Zoning By-Laws. The review of these elements are not included in EP's efforts.

Waiver 5: The response letter prepared by Embarc provides support to the proposed non-confirming parking stall dimension. EP's response to comment 15 confirms that a 9 foot by 18 foot parking stall is a typical parking stall dimension and a common standard throughout Massachusetts, although it does not comply with the Town's Zoning By-Laws. The waiver request also notes a 23' access drive aisle; while access aisle width is not specified by the Zoning By-Laws and as such a

waiver is not required for this component, EP notes that a 24' aisle width is a common standard and recommends this standard be met.

Waiver 6: VAI's response to comment 14 provides data from comparable sites in support of the proposed parking ratio. EP has requested additional data on the comparable sites provided, including total number of bedrooms, availability of transit, and proximity to transit. It is critical to understand these components when determining applicability of comparable site data.

Waiver 7: This waiver requests a clarification on any parking lot planting requirements for parcels containing a parking garage. Town input is requested.

Waivers 8 through 10: It is understood that these waivers have already been granted by the Planning Board.

Review of Architectural Access Board Opinion

As requested by the ZBA, EP has reviewed the advisory opinion provided by the Massachusetts Architectural Access Board (AAB) dated July 15, 2021 regarding the need for the Project to provide an accessible route to the public way. This opinion was requested by the Town Administrator as a determination of the applicability of 521 CMR 20.2, which states:

"Within the boundary of the *site*, an *accessible route(s)* shall be provided from *accessible* parking, *accessible* passenger loading zones, and public streets or *sidewalks* to the *accessible building entranc*e they serve. The *accessible route(s)* shall coincide with the route for the general public."

In its July 15, 2021 letter, the AAB noted its review of the Town Administrator submission and had voted to find that 521 CMR 20.2 would require an accessible route to the public way. EP does not take exception to the opinion provided by the AAB who typically have jurisdiction over such matters and recommends that the Project site design be modified to include an accessible route to School Street. This recommendation is supported by the Town's plans to provide sidewalk improvements along School Street as part of its Complete Streets commitment, as well as the Project's proposed TDM measures outlined in the TIAS, which state that pedestrian accommodations will be incorporated into the Project and generally support bicycle and walking alternatives.