

Ref: 8441

March 28, 2022

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

Re: Response to Review of Response to Comments
The Sanctuary at Manchester-by-the-Sea – School Street
Manchester-by-the-Sea, Massachusetts

Dear Ms. Brown:

Vanasse & Associates, Inc. (VAI) is providing responses to the comments that were raised in the March 4, 2022 *Review of Response to Comments #2* letter prepared by Environmental Partners (EP) in reference to their review of the February 28, 2022 *Response to Transportation Peer Review* (the “February 2022 RTC”) prepared by VAI in support of The Sanctuary multifamily residential development to be located off School Street in Manchester-by-the-Sea, Massachusetts (hereafter referred to as the “Project”). Listed below are the comments that were identified by EP in the subject letter that required a response or supplemental information, followed by our response on behalf of the Applicant.

Traffic Operations

EP Comment 9: *The impact of the project as illustrated in the 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.*

VAI Response: As a condition to the Comprehensive Permit, the Applicant has committed to conduct an improvement study for the Route 128 north and southbound ramp intersections with School Street, the results of which will be provided to the Town. In addition, the Applicant will agree to provide 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).

For discussion purposes, the estimated cost to design and construct traffic control signals at the Route 128 north and southbound ramp intersections with School Street is estimated to be \$590,000. The Project is expected to increase peak-hour traffic volumes within the interchange area by approximately 5 percent over No-Build conditions. As such, the fair-share cost allocation to the Project to design and construct the improvements is \$29,500 (5% x \$590,000 = \$29,500). The Applicant would fund that money to the Town designated account as a condition of receiving a building permit.

EP Follow-Up: *EP encourages the Applicant and the Town to continue coordination to establish a “fair-share” contribution. We note that the \$590,000 cost cited is likely to be inadequate for both design and construction of two separate signalized intersections meeting MassDOT design standards.*

Response: In furtherance of refining the “fair-share” contribution toward the improvements for the Route 128 north and southbound ramp intersections with School Street, a conceptual improvement plan has been prepared and is attached that illustrates the improvements that form the basis of the cost estimate. The estimated cost to design and construct the improvements that are depicted on the concept plan is estimated to be \$890,000, higher than the previous estimate due to the expended work that is shown to include the addition of left-turn lanes and pedestrian accommodations. Based on the new estimate, the fair-share cost allocation to the Project to design and construct the improvements is \$44,500 ($5\% \times \$890,000 = \$44,500$).

Site Access

EP Comment 11: *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.*

VAI Response: EP has confirmed the limitations that have resulted in the driveway location, and have also noted that lines of sight at the Project site driveway intersection with School Street meet the recommended distance for the intersection to operate in a safe manner.

EP Follow-Up: *As a point of clarity, EP’s confirmation regarding sight distance provided at the Project site driveway intersection does not address safety as it relates to the offset between the site driveway at Atwater Avenue. EP’s prior comment remains valid, noting that 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.*

Response: MassDOT guidelines¹ suggest minimum spacing between off-set intersections of 75 feet for a design speed of between 35 and 40 mph, and a spacing of 150 feet for a design speed of between 45 and 50 mph. The posted speed limit along School Street in the vicinity of the Project site is 35 mph and the measured 85th percentile vehicle travel speed was found to be 43 mph. As such, the off-set is consistent with MassDOT guidelines.

EP Comment 12: *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 the Zoning By-Law requirements.*

¹Project Development and Design Guide; Massachusetts Highway Department; 2006.



VAI Response: Response to be provided by others under separate cover.

EP Follow-Up: *EP is in receipt of a memorandum dated March 3, 2022 by Allen & Major Associates, Inc. providing a narrative for driveway design for the Project site. The narrative does not provide a description of alternative designs considered but describes known site constraints that essentially force the design elements included in the proposed site design.*

Response: The design constraints documents in the Allen & Major Associates, Inc. memorandum provides the justification and design approach that was used for the driveway design that is being advanced as a part of the Project. Once the design constraints were established, alternative designs that would not meet engineering standards for driveway grade and vehicle maneuvering were excluded, resulting in the proposed driveway design and location.

Parking

EP Comment 14: *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.*

VAI Response: As requested by EP, the number of bedrooms and availability and proximity to transit for each of the multifamily residential communities that were identified in the January 2022 RTC has been obtained. The requested information is summarized in Table 1 and in the paragraphs that follow the table with regard to transit access and proximity. **(This information has been excluded for brevity)**

EP Follow-Up: *The comparable site data provided reveals parking ratios on a per unit basis that are comparable to or lower than the proposed Project site, and ratios on a per bedroom basis that are lower than the proposed Project site. (EP notes that studio apartments at comparable sites were considered as one bedroom units; the proposed Project does not propose any studio units.)*

A review of transit access and proximity reveals that six of the seven sites have MBTA commuter rail, local transit bus, or fixed route shuttle service within reasonable walking distance of the sites. As such, supplied data does not provide an accurate comparison to the Project site.

Response: A number of the residential communities that were provided are not located proximate to public transportation and, similar to the Project, require residents to drive to a Commuter Rail Station. Further, the walking distance to bus service for some of the comparable locations is also outside of what would be considered reasonable to be



defined as transit accessible. That being said and based on a review of the comparable sites and the parking demand data from the Institute of Transportation Engineers (ITE)² for multifamily residential communities that are not located proximate to transit, the parking ratio that is being provided for the Project (1.78 parking spaces per unit) exceeds the ITE average (1.31 parking spaces per unit) and typical design value (1.47 parking spaces per unit) for parking for multifamily residential communities inclusive of guest parking.

EP Comment 16: *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 guest if surface parking is occupied.*

VAI Response: Guest parking is reflected in the parking supply for the properties identified in Table 1.

EP Follow-Up: *Response does not provide an assessment of the quantity or availability of guest parking at comparable sites. Furthermore, as noted in response to comment 14, the supplied data does not provide an accurate comparison to the Project site.*

Response: Parking at the cited locations is not typically differentiated between residents and guests, and is considered as “open” parking. The same is true for the ITE data, which does not differentiate between residents and guests, and demonstrates that peak parking demands for similar multifamily residential communities that are not located proximate to public transportation range from an average of 1.31 parking spaces per unit to a design value (85th percentile) of 1.47 parking spaces per unit, well below the 1.78 parking spaces per unit that are proposed.

EVALUATION OF RECOMMENDATIONS

EP Comment 17: *EP encourages the Applicant to engage with the Town to establish a “fair-share” cost contribution to potential roadway improvements in the near-term.*

VAI Response: See response to Comment 9.

EP Follow-Up: *Noted, see response to Comment 9.*

Response: See follow-up response to Comment 9.

EP Comment 18: *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.*

VAI Response: The existing sidewalk along School Street ends at the Route 128 southbound on-ramp and would need to be extended approximately 1,500 linear feet (lf) north to serve Atwater Avenue and the Project site. The approximate cost to construct 1,500 lf of sidewalk between the Route 128 southbound on-ramp and Atwater Avenue with the associated curbing and drainage would be \$250,000. Based on a preliminary civil engineering and environmental review of that section of School Street, it seems unlikely a sidewalk can be constructed in that area due to the presence of vernal pools and wetland resource areas. Nevertheless, following the similar methodology to

²Parking Generation Manual, 5th Edition; Institute of Transportation Engineers; January 2019.



establishing a fair-share contribution for the School Street improvements at the Route 128 ramp intersections, the Project represents an approximate 12 percent increase in average weekday traffic over 2029 No-Build conditions on School Street between the Project site and the Route 128 southbound ramps. As such, the fair-share cost allocation to the Project to design and construct a sidewalk within the subject limits is \$30,000 ($12\% \times \$250,000 = \$30,000$). The Applicant would fund that money to the Town designated account as a condition of receiving a building permit

EP Follow-Up: *EP encourages the Applicant and the Town to continue coordination to establish a “fair-share” contribution. A determination of the fair-share cost based on traffic volume increases on School Street does not properly assess the specific benefit to the Project of a sidewalk extension, nor does it consider the importance of both on-site and off-site pedestrian infrastructure improvements to realize the effectiveness of TDM measures proposed by the Applicant.*

Response: The Applicant will continue to coordinate with the Town to establish the “fair-share” contribution for the construction of a sidewalk along School Street, with the \$30,000 contribution serving as the basis for subsequent discussions with the Town pertaining to this contribution.

EP Comment 19: *EP encourages the Applicant to engage with the Town to establish proposed traffic calming elements in the near-term.*

VAI Response: As a condition to the Comprehensive Permit, to the extent desired by the Town in the near-term, the Applicant will purchase and install two (2) radar speed feedback signs to be installed on School Street north of the Project site driveway (for southbound motorists) and south of Atwater Avenue (for northbound motorists).

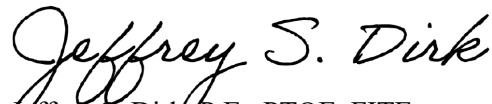
EP Follow-Up: *EP encourages the Board to include this condition.*

Response: The Applicant takes no exception to this being added as a condition of the approval granting a Comprehensive Permit for the Project.

We believe that this information is responsive to the comments that were raised in the March 4, 2022, *Review of Response to Comments #2* letter prepared by EP. If you should have any questions or would like to discuss our responses in more detail, please feel free to contact me.

Sincerely,

VANASSE & ASSOCIATES, INC.



Jeffrey S. Dirk, P.E., PTOE, FITE
Managing Partner

Professional Engineer in CT, MA, ME, NH, RI, and VA

Attachments



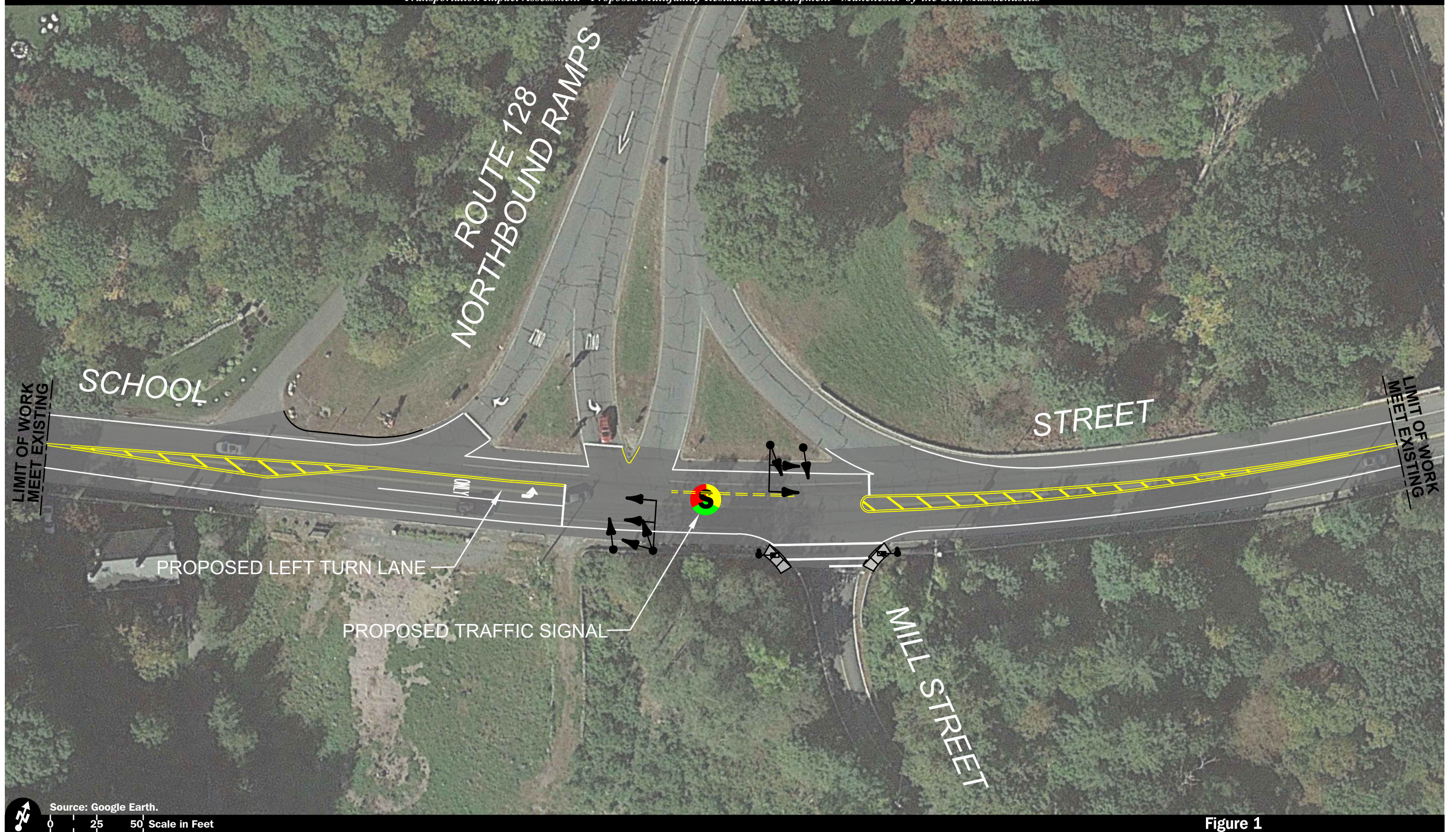


Figure 1

Conceptual Improvement Plan
School Street at Mill Street and
Route 128 Northbound Ramps
Sheet 1 of 2

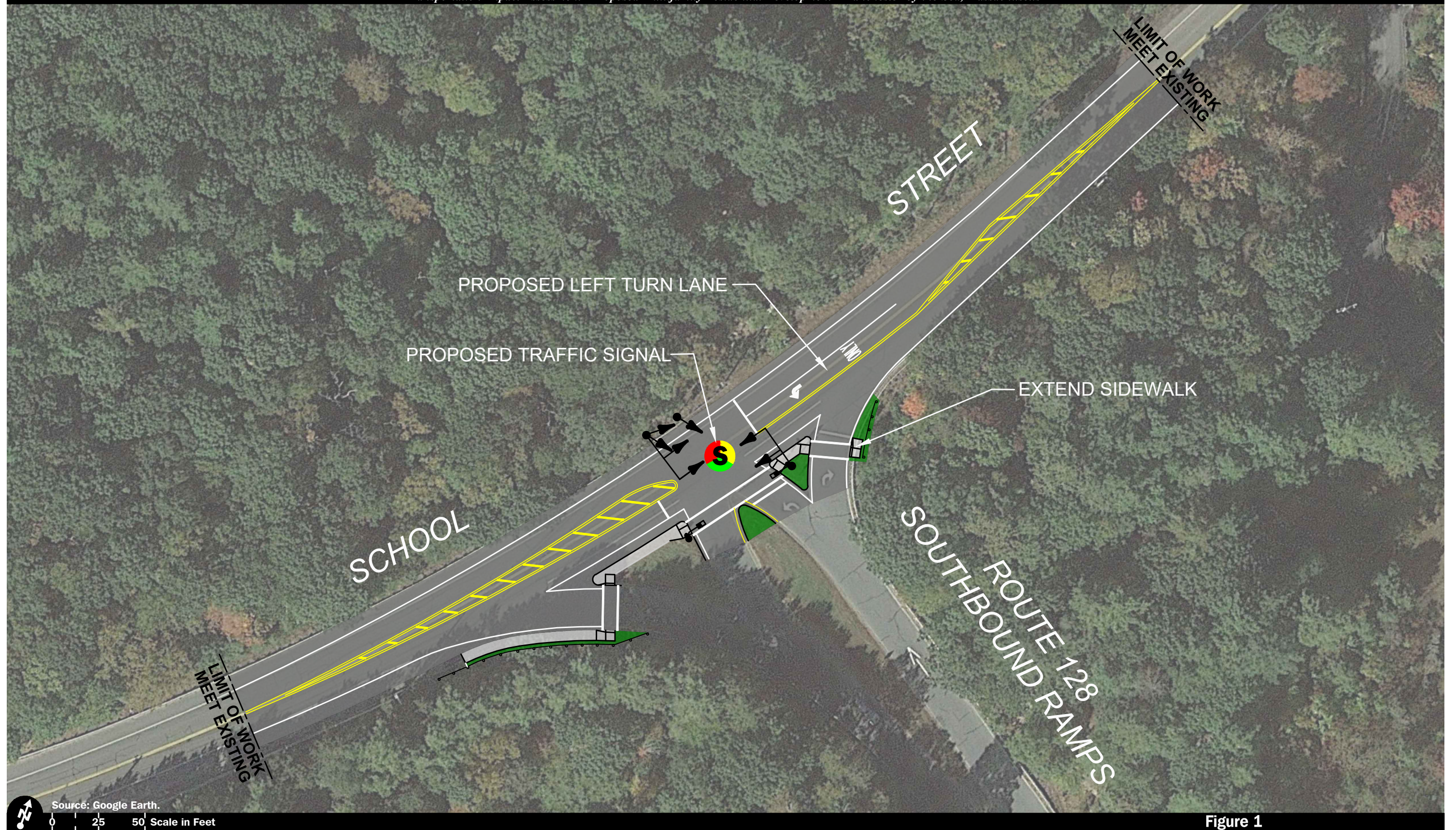


Figure 1

Conceptual Improvement Plan
School Street at Mill Street and
Route 128 Southbound Ramps
Sheet 2 of 2