

Ref: 9121

October 20, 2021

Mr. William Scanlan
Town Planner
Town of Dudley
71 West Main Street
Dudley MA, 01571

Re: Traffic Engineering Peer Review
Stevens Mill Redevelopment – 8 Mill Street
Dudley, Massachusetts

Dear Bill:

Vanasse & Associates, Inc. (VAI) has completed a review of the materials submitted on behalf of Stevens Mill Owner, LLC (the “Applicant”) in support of the proposed renovation of the Stevens Mill located at 8 Mill Street in Dudley, Massachusetts, to accommodate a multifamily residential development (hereafter referred to as the “Project”). Our review focused on the following specific areas as they relate to the Project: i) vehicle and pedestrian access and circulation; ii) Massachusetts Department of Transportation (MassDOT) design standards; iii) Town Zoning requirements as they relate to access, parking and circulation; and iv) accepted Traffic Engineering and Transportation Planning practices. The Applicant has submitted the following supporting materials which are the subject of this review:

1. *Site Layout Plan*, Proposed Development, Mill Street, Town of Dudley, Worcester County, MA; Bohler; July 9, 2021, no revisions;
2. *Traffic Impact Assessment*, Stevens Mill – Proposed Multi-Family Residential Development, 8 Mill Street, Dudley, Massachusetts; VHB; August 24, 2021 (the “August 2021 TIA”); and
3. “Draft” exhibit (undated) titled “Planned and Proposed Traffic Improvements near the Stevens Mill Redevelopment Project”.

In addition, VAI reviewed the site locus in order to validate the existing conditions context of the Project and to observe factors related to the design and location of the access to the Project site, internal circulation and potential off-site improvements.

Based on our review of the aforementioned materials that have been submitted in support of the Project, we have determined that the materials were prepared in a professional manner and following the applicable standards of care. That being said, the Applicant should address the following comments that were identified as a part of our review, a summary of which follows:

August 2021 TIA

- T1: There are inconsistencies with the description of pedestrian facilities within the study area that should be corrected. Sidewalks are provided along the east side of Village Street and along the east side of Mill Street north of Village Street. In addition, pedestrian accommodations are provided at the Mill Street/Village Street (along both Village Street and Mill Street north of the intersection), West Main Street/Mill Street (along West Main Street) and West Main Street/Ardlock Place (along West Main Street) intersections. It is suggested that a graphic be prepared that shows the location of existing and proposed pedestrian facilities and trails be prepared.
- T2: A description of existing and proposed bicycle facilities/accommodations should be provided.
- T3: A review of public transportation services that will be accessible to residents of the Project should be undertaken. We note that the Worcester Regional Transit Authority (WRTA) provides fixed-route bus service to the Town of Dudley by way of the Webster-Dudley-Southbridge Shuttle, which includes service along West Main Street and will be accessible to residents of the Project.
- T4: U.S. Census Journey-to-Work data should be reviewed to validate the trip distribution pattern that was used for the Project.
- T5: The trip distribution pattern for the Project should be reviewed given the constrained operating conditions and extended delay that are predicted along Ardlock Place, and the traffic operations analysis for the Build condition should be revised accordingly.
- T6: An assessment of both stopping sight distance and intersection sight distance should be provided for the Project site driveway intersections with Ardlock Place performed in accordance with the standards of the American Association of State Highway and Transportation Officials (AASHTO)¹ and using the posted (or statutory) speed limit or the measured 85th percentile vehicle travel speed along Ardlock Place at the Project site driveways, whichever is higher. In addition, the stopping sight distance evaluation should consider the grade of Ardlock Place when establishing the required minimum sight distance for safe operation.
- T7: The Applicant should commit to implementing the improvements that are listed on the “Draft” exhibit titled “Planned and Proposed Traffic Improvements near the Stevens Mill Redevelopment Project” that were listed as “To be implemented by Stevens Mill Owners (before 2024)”. That being said, these improvements are necessary to afford safe and efficient access to the Project and should be completed prior to the issuance of a Certificate of Occupancy for the Project.
- T8: The transportation improvement program for the Project should be expanded to include the following improvements:
1. “Intersection Ahead” warning signs (graphic symbol) should be installed on Mill Street in advance (north) of the Mill Street/Village Street intersection.
 2. Install “Do Not Block” signs and accompanying pavement markings on West Main Street at Mill Street and at Ardlock Place.

¹*A Policy on Geometric Design of Highway and Streets*, 7th Edition; American Association of State Highway and Transportation Officials (AASHTO); 2018.



3. Design and implement an optimal traffic signal timing and phasing plan for the West Main Street/Village Street/Schofield Avenue intersection prior to achieving 50 percent occupancy of the Project so that the timing changes reflect the traffic patterns resulting from the Project.
4. Implement a Transportation Demand Management (TDM) program inclusive of the following elements:
 - A transportation coordinator should be assigned for the Project to coordinate the TDM program;
 - Information regarding public transportation services, maps, schedules and fare information should be posted in a central location and/or otherwise made available to residents;
 - A “welcome packet” should be provided to residents detailing available public transportation services, bicycle and walking alternatives, and commuting options;
 - Pedestrian accommodations should be incorporated within the Project site and extend to the planned sidewalks on Mill Street and Ardlock Place;
 - Secure bicycle parking should be provided consisting of both weather protected bicycle parking and exterior bicycle racks; and
 - A central mail drop should be provided within the Project.

Site Layout Plan

- S1. A vehicle turning analysis should be provided using the AutoTurn© software for a single-unit truck (SU-30 design vehicle) and the Dudley Fire Department design vehicle. The turning analysis should depict all maneuvers required to enter and exit the Project site, as well as those required to access the location for trash/recycling and service/loading, and should demonstrate that the subject vehicles can access the Project site and circulate in an unimpeded manner.
- S2: A STOP-sign and marked STOP-line should be added to the Project site driveways.
- S3: Americans with Disabilities Act (ADA) compliant wheelchair ramps should be provided for crossing the Project site driveways and at pedestrian crossings within the Project site. As an alternative for crossing the Project site driveways, the proposed sidewalk can be designed so as to be flush across the driveways (i.e., pan-type driveway).
- S4: A note should be added stating: “All Signs and pavement markings to be installed within the Project site shall conform to the applicable specifications of the Manual on Uniform Traffic Control Devices (MUTCD).²”
- S5. Bicycle rack(s) should be provided at an appropriate location(s) within the Project site and weather protected bicycle parking should be provided within the building. The Zoning Bylaw requires that 0.05 bicycle parking spaces be provided for every vehicle parking space required under the Zoning Bylaw, with a minimum of one (1) and a maximum of 20.
- S6. The sight triangle areas for the Project site driveway intersections should be shown along with a note to indicate: “Signs, landscaping and other features located within sight triangle areas shall be

²Manual on Uniform Traffic Control Devices (MUTCD); Federal Highway Administration; Washington, DC; 2009.



designed, installed and maintained so as not to exceed 2.5-feet in height. Snow accumulation (windrows) located within sight triangle areas that exceed 3.5-feet in height or that would otherwise inhibit sight lines shall be promptly removed.”

- S7. Consideration should be given to installing electric vehicle (EV) charging stations for use by residents of the Project.

This concludes our review of the materials that have been submitted to date in support of the Project. If you should have any questions regarding our review, 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

Attachment

JSD/jsd



**TRAFFIC ENGINEERING PEER REVIEW
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The following details Vanasse & Associates, Inc.'s (VAI's) review of the August 24, 2021 *Traffic Impact Assessment* prepared by VHB (the "August 2021 TIA") and the July 9, 2021 (no revisions) *Site Layout Plan* prepared by Bohler in support of the proposed renovation of the Stevens Mill located at 8 Mill Street in Dudley, Massachusetts, to accommodate a multifamily residential development (hereafter referred to as the "Project"). Our comments are indicated in *italicized* text, with those requiring responses or additional information ***bolded***.

PROJECT DESCRIPTION

The Project will entail the renovation of the existing Stevens Mill located at 8 Mill Street in Dudley, Massachusetts, to accommodate a 156-unit multifamily residential development with supporting amenity space, play areas and parking. In conjunction with the Project, a portion of the French River Greenway Trail will be constructed along the river frontage of the Project site. The Stevens Mill complex is bounded by a commercial property and areas of open and wooded space to the north; Mill Street, Ardlock Place and a commercial property to the south; the French River and areas of open and wooded space to the east; and Mill Street and Ardlock Place to the west. Access to the Project site will be provided by way of two (2) full access driveways that will intersect the north side of Ardlock Place between Mill Street and West Main Street (Route 12/197). In addition, a connection to the Dunkin' Restaurant located at 12 West Main Street that abuts the Project site to the south is also shown on the *Site Layout Plan*, although it is not clear from the August 2021 TIA if this connection will be constructed in conjunction with the Project.

Off-street parking will be provided for 248 vehicles in surface parking lots that bound the mill building to the north, south and east, and includes seven (7) handicapped accessible spaces.

August 2021 TIA

General

Comment: The August 2021 TIA was prepared in a professional manner and following the applicable standards of care, and was prepared under the responsible charge of Vinod Kalikiri, P.E. (MA P.E. No. 41442, Civil).

Existing Conditions

Study Area

The study area that was assessed in the August 2021 TIA included Mill Street, Village Street, West Main Street (Route 12/197), Schofield Avenue (Route 12) and Ardlock Place, and the following specific intersections:

- Mill Street at Village Street
- West Main Street at Village Street and Schofield Avenue
- West Main Street at Mill Street
- West Main Street at Ardlock Place



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Comment: This study area is sufficient to evaluate the potential impact of the Project on the transportation infrastructure and includes all intersections where the Project is predicted to result in an increase in peak hour traffic volumes by: a) five (5) percent or more, or b) by more than 100 vehicles per hour.

Traffic Volumes and Data Collection

Traffic volume data was collected by means of manual turning movement counts (TMCs) and vehicle classification counts conducted at the study intersections during the weekday morning (7:00 to 9:00 AM) and evening (4:00 to 6:00 PM) peak periods on Tuesday, May 25, 2021. A review of seasonal adjustment data available from MassDOT indicated that traffic volumes within the study area during the month of May are representative of conditions that are approximately 4.0 percent below average-month conditions. As such, the May traffic volumes were increased by 4.0 percent to represent traffic volumes under average-month conditions.

In addition to the seasonal adjustment, a review of historic traffic count data in the vicinity of the Project site available from MassDOT was undertaken in order to determine if an adjustment was required in order to account for the impacts on traffic volumes and trip patterns resulting from the COVID-19 pandemic. Based on this review, it was determined that traffic volumes within the study area as measured in May 2021 are approximately 18 percent lower than those measured in 2019, prior to the restrictions associated with the pandemic. As such, the seasonally adjusted traffic volumes were increased by an additional 18 percent in order to reflect pre COVID-19 traffic volume conditions.

Comment: The data collection effort, seasonal adjustment and COVID-19 impact review and adjustment were completed following MassDOT standards and the guidance for Transportation Impact Assessments (TIAs) conducted during the COVID-19 pandemic,³ and we are in general agreement with the resulting traffic volumes.

Pedestrian and Bicycle Facilities

A description of pedestrian facilities within the study area was presented as a part of the roadway and intersection descriptions in the August 2021 TIA.

Comment T1: There are inconsistencies with the description of pedestrian facilities within the study area that should be corrected. Sidewalks are provided along the east side of Village Street and along the east side of Mill Street north of Village Street. In addition, pedestrian accommodations are provided at the Mill Street/Village Street (along both Village Street and Mill Street north of the intersection), West Main Street/Mill Street (along West Main Street) and West Main Street/Ardlock Place (along West Main Street) intersections. It is suggested that a graphic be prepared that shows the location of existing and proposed pedestrian facilities and trails be prepared.

Comment T2: A description of existing and proposed bicycle facilities/accommodations should be provided.

³Guidance on Traffic Count Data; MassDOT; revised April 2020.



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Public Transportation

A description of public transportation services that are available within the study area was not presented in the August 2021 TIA.

***Comment T3:** A review of public transportation services that will be accessible to residents of the Project should be undertaken. We note that the Worcester Regional Transit Authority (WRTA) provides fixed-route bus service to the Town of Dudley by way of the Webster-Dudley-Southbridge Shuttle, which includes service along West Main Street and will be accessible to residents of the Project.*

Motor Vehicle Crash Summary

Motor vehicle crash information for the study area intersections was completed using data obtained from MassDOT for the five-year period 2016 through 2020, inclusive. Based on a review of the MassDOT data, the study area intersections experienced an average of approximately six (6) or fewer reported motor vehicle crashes per year over the five-year review period, and were found to have a calculated motor vehicle crash rate (i.e., number of motor vehicle crashes per million vehicles entering (MEV) the intersection) that was below the MassDOT average crash rate for similar intersections. The West Main Street/Village Street/Schofield Street intersection was reported to have experienced the largest number of motor vehicle crashes, with 28 total crashes reported over the five-year review period.

A review of the MassDOT statewide High Crash Location List indicated that there are no listed locations within the study area that are included on MassDOT's Highway Safety Improvement Program (HSIP) listing as a high crash cluster location.

***Comment:** The motor vehicle crash analysis was completed in general accordance with MassDOT standards and following accepted Traffic Engineering and Transportation Planning practices, and we are in agreement with the findings of the analysis.*

Future Conditions

No-Build Conditions

Traffic volumes within the study area were projected to 2028, which represents a 7-year planning horizon from the existing conditions base year (2021) that was presented in the August 2021 TIA. The future condition traffic volume projections were developed by: i) applying a background traffic growth rate to the 2021 Existing traffic volumes; and ii) adding traffic associated with specific development projects by others that may increase traffic volumes within the study area beyond that accounted for by the background traffic growth rate.

A review of traffic growth rates used in other studies conducted in the Town was undertaken. Based on this review, a 1.0 percent per year compounded annual background traffic growth rate was used. The Applicant's engineer consulted with the Town of Dudley in order to ascertain if there were any specific development projects by others that would result in an increase in traffic volumes within the study area that would exceed the background traffic growth rate. Based on this consultation, two (2) specific development



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projects by others were identified for inclusion in the future condition traffic volume projections (a marijuana cultivation/processing facility to be located at 34-37 Chase Avenue and a contractor's yard to be located at 24 Oxford Avenue).

The Applicant's engineer also researched planned future roadway improvement projects that are proposed within the study area. Based on this research, the planning study that was conducted by the Central Massachusetts Regional Planning Commission (CMRPC) for Main Street/West Main Street and the Town of Dudley's Complete Streets Prioritization Plan were identified, both of which identified the need to undertake improvements to pedestrian, bicycle and public transportation accommodations within the study area that was assessed in the August 2021 TIA.

Comment: We are in agreement with the methodology that was used to develop the future No-Build condition traffic volume projections, including the background traffic growth rate (1.0 percent) and inclusion of the identified specific development projects by others.

Build Conditions

The traffic characteristics of the Project were developed by the Applicant's engineer using trip-generation statistics published by the Institute of Transportation Engineers (ITE)⁴ for a similar land use as that proposed. ITE Land Use Code (LUC) 221, *Multifamily Housing (Mid-Rise)*, was used to develop the traffic characteristics of the Project, the results of which are summarized in the table below:

**Stevens Mill Redevelopment
Trip-Generation Summary**

Time Period	Vehicle Trips ^a		
	Entering	Exiting	Total
<i>Average Weekday</i>	425	425	850
<i>Weekday Morning Peak Hour</i>	14	39	53
<i>Weekday Evening Peak Hour</i>	41	27	68

^aBased on ITE LUC 221, *Multifamily Housing (Mid-Rise)*; 156 units.

Trips associated with the amenity space were assumed to be reflected in the trip calculations for the residential units as the amenity space is primarily intended to serve the residents of the Project and it is unlikely that the community meeting space will generate meaningful traffic volumes during the typical commuter peak hours.

Traffic volumes associated with the Project were assigned to the study area roadways and intersections based on a review of existing traffic patterns within the study area and the layout of parking within the Project site.

⁴*Trip Generation*, 10th Edition; Institute of Transportation Engineers; Washington, DC; 2017.



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Comment: We are in agreement with the methodology that was used to develop the traffic characteristics of the Project.

Comment T4: U.S. Census Journey-to-Work data should be reviewed to validate the trip distribution pattern that was used for the Project.

Traffic Operations Analysis

In order to assess the potential impact of the Project on the transportation infrastructure, a detailed traffic operations analysis was performed for the study intersections under 2021 Existing, 2028 No-Build (without the Project) and 2028 Build conditions (with the Project). In brief, traffic operations are described by six “levels of service” which are defined by letter grades from “A” through “F”, with a level-of-service (LOS) “A” representing the best operating conditions (average motorist delays of less than 10 seconds and little or no apparent vehicle queuing) and a LOS “F” representing constrained operating conditions (average motorist delays of 50 to 80 seconds or more and often with apparent vehicle queuing). A LOS of “E” is representative of an intersection or traffic movement that is operating at its design capacity, with a LOS of “D” typically representing the limit of acceptable traffic operations.

A review of the traffic operations analysis indicates that the addition of Project-related traffic to the study area intersections will not result in a significant increase in motorist delays or vehicle queuing over anticipated future conditions without the Project (i.e. No-Build conditions). With the exception of the Ardlock Place approach to West Main Street, Project-related impacts were generally defined as an increase in average motorist delay of up to 5.5 seconds and in vehicle queuing of up to one (1) vehicle.

Similar to other unsignalized driveways and side streets along the West Main Street corridor, the Ardlock Place approach to West Main Street was shown to operate with extended delay (> 60 seconds) and vehicle queueing (up to none (9) vehicles) during both the weekday morning and evening peak hours, independent of the Project. The addition of Project-related traffic to Ardlock Place will further increase delays and it is likely that vehicle queues along Ardlock Place will interact with the Project site driveways.

Comment: We are in agreement with the methodology that was used to complete the traffic operations analysis and note the following:

- *The predicted vehicle queues on the West Main Street westbound approach to Village Street/Schofield Avenue will extend beyond Mill Street during the weekday evening peak-hour and will result in longer delays and vehicle queuing for the Mill Street approach to West Main Street than reported by the analysis model.*
- *Motorist delays and vehicle queuing were shown to be reduced on the Ardlock Place approach to West Main Street between Existing and No-Build conditions, which is a result of changes to the peak-hour factor between the analysis conditions. We disagree that an improvement will occur as indicated; however, we agree with the relative impact of the Project at the intersection as measured vs. No-Build conditions.*



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- *Vehicle queues on the Ardlock Place approach to West Main Street will extend past the Project site driveways and impact the ability to enter and exit the Project site. This will likely influence the trip distribution pattern for the Project and increase the volume of traffic assigned to the West Main Street/Village Street/Schofield Avenue intersection and Mill Street to the north of the Project site.*

Comment T5: The trip distribution pattern for the Project should be reviewed given the constrained operating conditions and extended delay that are predicted along Ardlock Place, and the traffic operations analysis for the Build condition should be revised accordingly.

Sight Distance

An evaluation of sight lines at the Project site driveway intersections with Ardlock Place was not provided as a part of the August 2021 TIA and is required to demonstrate that the Project site driveways are appropriately designed and located to function in a safe manner.

Comment T6: An assessment of both stopping sight distance and intersection sight distance should be provided for the Project site driveway intersections with Ardlock Place performed in accordance with the standards of the American Association of State Highway and Transportation Officials (AASHTO)⁵ and using the posted (or statutory) speed limit or the measured 85th percentile vehicle travel speed along Ardlock Place at the Project site driveways, whichever is higher. In addition, the stopping sight distance evaluation should consider the grade of Ardlock Place when establishing the required minimum sight distance for safe operation.

Recommendations

The following recommendations were provided as a part of the August 2021 TIA:

➤ **Near-Term Improvements:**

- Install a radar speed feedback sign on Mill Street approximately 300-400 feet north of the Mill Street/Village Street intersection
- Install a flashing beacon at the West Main Street/Ardlock Place intersection
- Consider restricting Ardlock Place to one-way southbound (toward West Main Street) until such time as the roadway can be widened to accommodate two-way travel
- Consider closing the Dunkin' Restaurant driveway along Ardlock Place and adding a connection to the Project site driveway

⁵*A Policy on Geometric Design of Highway and Streets*, 7th Edition; American Association of State Highway and Transportation Officials (AASHTO); 2018.



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➤ Long-Term Improvements:

- Narrow Mill Street along the Project site frontage to reduce travel speeds by means of installing a sidewalk
- Widen Ardlock Place to provide two 12-foot wide travel lanes and a 5-foot wide sidewalk

In a subsequent follow-up exhibit marked “Draft”, the Project proponent committed to implementing the following improvements as a part of the Project before 2024:

- Install a radar speed feedback sign on Mill Street approximately 400 feet north of the Mill Street/Village Street intersection
- Narrow Mill Street between Village Street and Flaxfield Road to 22-feet
- Widen the sidewalk along the Project site frontage to 5-feet
- Widen Ardlock Place to accommodate two-way travel
- Add or widen the sidewalk along the north side of Ardlock Place

The exhibit also identified potential future improvements by others as follows:

- Retime the traffic signal at the West Main Street/Village Street/Schofield Avenue intersection
- Reconstruct/widen the Village Street approach to the West Main Street/Village Street/Schofield Avenue intersection and increase the separation between the left-turn lanes on the West Main Street approaches
- Install “Do Not Block” pavement markings on West Main Street at both Mill Street and Ardlock Place
- Install a flashing beacon at the West Main Street/Ardlock Place intersection
- Explore alternative approaches to improving traffic control for the Dunkin’ Restaurant

Comment T7: The Project proponent should commit to implementing the improvements that are listed on the “Draft” exhibit titled “Planned and Proposed Traffic Improvements near the Stevens Mill Redevelopment Project” that were listed as “To be implemented by Stevens Mill Owners (before 2024)”. That being said, these improvements are necessary to afford safe and efficient access to the Project and should be completed prior to the issuance of a Certificate of Occupancy for the Project.

Comment T8: The transportation improvement program for the Project should be expanded to include the following improvements:

1. ***“Intersection Ahead” warning signs (graphic symbol) should be installed on Mill Street in advance (north) of the Mill Street/Village Street intersection.***



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2. *Install “Do Not Block” signs and accompanying pavement markings on West Main Street at both Mill Street and at Ardlock Place.*
3. *Design and implement an optimal traffic signal timing and phasing plan for the West Main Street/Village Street/Schofield Avenue intersection prior to achieving 50 percent occupancy of the Project so that the timing changes reflect the traffic patterns resulting from the Project.*
4. *Implement a Transportation Demand Management (TDM) program inclusive of the following elements:*
 - *A transportation coordinator should be assigned for the Project to coordinate the TDM program;*
 - *Information regarding public transportation services, maps, schedules and fare information should be posted in a central location and/or otherwise made available to residents;*
 - *A “welcome packet” should be provided to residents detailing available public transportation services, bicycle and walking alternatives, and commuting options;*
 - *Pedestrian accommodations should be incorporated within the Project site and extend to the planned sidewalks on Mill Street and Ardlock Place;*
 - *Secure bicycle parking should be provided consisting of both weather protected bicycle parking and exterior bicycle racks; and*
 - *A central mail drop should be provided within the Project.*

SITE LAYOUT PLAN

The following comments are offered with regard to our review of the *Site Layout Plan* prepared by Bohler and dated July 9, 2021, no revisions:

Comment S1: *A vehicle turning analysis should be provided using the AutoTurn© software for a single-unit truck (SU-30 design vehicle) and the Dudley Fire Department design vehicle. The turning analysis should depict all maneuvers required to enter and exit the Project site, as well as those required to access the location for trash/recycling and service/loading, and should demonstrate that the subject vehicles can access the Project site and circulate in an unimpeded manner.*

Comment S2: *A STOP-sign and marked STOP-line should be added to the Project site driveways.*

Comment S3: *Americans with Disabilities Act (ADA) compliant wheelchair ramps should be provided for crossing the Project site driveways and at pedestrian crossings within the Project site. As an alternative for the crossing of the Project site driveways, the proposed sidewalk can be designed so as to be flush across the driveways (i.e., pan-type driveway).*



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- Comment S4:** *A note should be added stating: “All Signs and pavement markings to be installed within the Project site shall conform to the applicable specifications of the Manual on Uniform Traffic Control Devices (MUTCD).”⁶*
- Comment S5.** *Bicycle rack(s) should be provided at an appropriate location(s) within the Project site and weather protected bicycle parking should be provided within the building. The Zoning Bylaw requires that 0.05 bicycle parking spaces be provided for every vehicle parking space required under the Zoning Bylaw, with a minimum of one (1) and a maximum of 20.*
- Comment S6.** *The sight triangle areas for the Project site driveway intersections should be shown along with a note to indicate: “Signs, landscaping and other features located within sight triangle areas shall be designed, installed and maintained so as not to exceed 2.5-feet in height. Snow accumulation (windrows) located within sight triangle areas that exceed 3.5-feet in height or that would otherwise inhibit sight lines shall be promptly removed.”*
- Comment S7.** *Consideration should be given to installing electric vehicle (EV) charging stations for use by residents of the Project.*

PARKING

The *Site Layout Plan* illustrates that off-street parking will be provided for 248 vehicles in surface parking lots that bound the mill building to the north, south and east, and includes seven (7) handicapped accessible spaces.

A review of Section 4.01.02, *Parking Standards Catalog*, of Town of Dudley Zoning Bylaw requires that 1.5 parking spaces per dwelling unit be provided for multifamily buildings, or 234 parking spaces in the case of the Project. Given that the *Site Layout Plan* indicates that 248 parking spaces will be provided, the parking supply complies with the Zoning Bylaw.

⁶*Manual on Uniform Traffic Control Devices (MUTCD)*; Federal Highway Administration; Washington, DC; 2009.

