



Memorandum

To: Pascal Rettig
Planning Board Chair
City of Amesbury
62 Friend Street
Amesbury, MA 02913

Date: January 16, 2026

Project #: 201067.000

From: Patrick Dunford, P.E.
Senior Project Manager

Re: Proposed 2-3 Family, Multi-Family Residential Development
Clarks Road, Amesbury, Massachusetts
Transportation Engineering – 2nd Peer Review

As requested by the Amesbury Planning Board, VHB has completed a second review of transportation-related material submitted in support of the proposed residential development (the "Project") at 27.5 & 29 Clark's Road in Amesbury, Massachusetts (the "Site"). Since the time of VHB's initial review, Eagles Crossing LLC (the "Applicant") has submitted responses to VHB's December 4, 2025 comments with updated plans and material. Specifically, VHB reviewed the following transportation-related items for this second review:

- "Proposed Multi-Family Residential Development – 27.5 and 29 Clarks Road Amesbury, Massachusetts" responses to VHB transportation peer review letter prepared by VAI dated December 12, 2025;
- VAI supplemental responses (dated January 7, 2026) to VHB's transportation peer review letter; and
- Site Development Plans prepared by The Morin-Cameron Group, Inc., dated September 29, 2025 (revised through December 17, 2025).

A separate memorandum (dated December 29, 2025) summarizing VHB's ongoing civil engineering and stormwater review was provided under separate cover.

Transportation Impact Assessment review

VHB has reviewed the additional transportation-related material noted above. The following comments are being provided following the same general format of the prior VHB review letter. For ease of review, comments from the prior review letter are shown in plain text, followed by responses from VAI provided in underlined and italicized text, with any additional comments from VHB provided in **bold text**.

Existing Conditions

Comment 1: Study Area – The study area evaluated appropriately considers the key roadway and intersections most likely to experience any impacts as a result of the Project. The roadway inventory descriptions and subsequent Figure 2 graphic accurately depict current roadway conditions and existing traffic control. No expansion or modification of this study area is required.

Response: *No response required.*

Comment 2: Traffic Volumes – The underlying peak period turning movement counts (TMCs) for the TIA analysis were conducted in July 2023, with the exception of the weekday TMCS for the Route 110 (Macy Street)/Elm Street/Clark's Road intersection which were conducted on April 30, 2025. While no seasonal adjustments were required, the counts were appropriately increased using an annual growth rate to reflect 2025 existing conditions. [For consistency, these same 2023 TMCs were used for the traffic study¹ for the nearby proposed Rocky Hill Residential Development also prepared by VAI. However, as that study was prepared in 2024, July 2023 TMCs also

were used for Saturday conditions in that study.] The peak hour traffic volumes are balanced between arriving and departing intersection volumes except for the Route 110 (Macy Street) segment between its intersections with Carriagetown Marketplace and Elm Street/Clark's Road. That is attributable to the presence of commercial driveways along that segment, which does not require any adjustments to the volumes. VHB compared the recent 2025 counts at the Route 110 (Macy Street) Elm Street/Clark's Road intersection to prior 2023 counts (from the Rocky Hill Residential Development study noted earlier) and found that there were no major differences in volumes beyond normal fluctuations.

Response: No response required.

Comment 3: Pedestrian and Bicycle Facilities – the TIA provides descriptions of current pedestrian and bicycle accommodations in the study area. This discussion should be expanded to include the observed pedestrian and bicycle volumes. While existing volumes appear to be low, any notable existing patterns should be noted along with any likely future desire lines associated with expected residential growth in the area.

Response: Pedestrian and bicycle counts were collected at the same time as vehicle counts at the study area intersections. The existing counts do not show any notable pattern. There was 1 bicyclist observed during the weekday morning peak hour traveling westbound on Route 110 and 1 pedestrian observed crossing the I-95 southbound on-ramp north of Route 110. During the weekday evening peak hour, there were 2 pedestrians who crossed the Carriagetown Marketplace driveway, 2 that crossed the I-95 southbound ramps south of Route 110, 1 who crossed the I-95 northbound off-ramp south of Route 110, and 1 who crossed Route 110 east of Clarks Road. There was 1 observed bicyclist traveling south on Elm Street to Clarks Road, 1 on Route 110 eastbound, and 2 on Route 110 westbound during the weekday evening peak hour. On Saturday, 3 pedestrians were observed crossing Elm Street north of Route 110. One bicyclist was observed traveling south on Elm Street to Clarks Road and up to 4 on Route 110 traveling westbound.

Most of the bicycle traffic is heading westbound on Route 110, although the numbers are very low. In the future, with the residential development in the area coming online, we would suspect some additional pedestrian and bicycle traffic in the area, but we expect the overall numbers to continue to be low. Residents at the Project will likely frequent the proposed Starbucks and other commercial developments on Route 110. In addition, the MassWork grant project will upgrade the sidewalk from the Project frontage to the Starbuck property, which connects them to the sidewalks on Route 110, Elm Street, and the Salisbury Point Ghost Trail.

VHB Response: The information provided above appropriately documents the minimal pedestrian and bicycle activity which currently exists in this area. Regardless of this, the Applicant still is proposing mitigation in the form of new sidewalks on Clark's Road as discussed later in this memorandum.

Comment 4: Public Transportation – the TIA provides an appropriate inventory of existing MeVA public transportation accommodations within the area.

Response: No response required.

Comment 5: Crash Analysis – The study provides a comprehensive crash analysis which indicates a relatively low crash experience in recent years within the study area. Notwithstanding the low crash history, a Roadway Safety Audit (RSA) was conducted in June 2025 on behalf of the nearby Rocky Hill Residential Development project. That RSA evaluated both the intersections of Route 110 with Elm Street/Clark's Road and Merrill Street/Rabbit Road (within the Town Salisbury). VHB understands that the proponent of that project has committed to implementing the short-term, low-cost measures identified in the RSA. If that project should not proceed in a timely manner (to be defined by the Planning Board, ideally before Project occupancy) then that mitigation responsibility, for the Route 110

(Macy Street)/Elm Street/Clark's Road intersection only, should be assumed by this Project's proponent. While the intersection issues pre-date this Project, the additional traffic added to this intersection by the Project could exacerbate existing deficiencies.

Response: The short-term low-cost improvements from the RSA that the Rocky Hill Road development are supposed to implement are also part of the MassWorks grant project that the City will be undertaking. The improvements are listed below:

- Test the vehicle detection system and repair or replace the associated equipment as needed;
- Replace the emergency vehicle pre-emption system and adjust the location of the receivers as necessary to ensure proper operation;
- Evaluate the impact on traffic operations of restricting right-turn-on-red movements. If deemed feasible and desirable by MassDOT, install the necessary signs to restrict this movement;
- Review and adjust the "yellow" and "all red" clearance intervals
- Trim vegetation to improve sight lines on the approaches to the intersection and at the intersection corners;
- Add advance lane assignment markings on the Elm Street approach;
- Reapply the crosswalk pavement markings with high visibility, ladder style thermoplastic markings;
- Reapply the pavement markings on the intersection approaches with high visibility thermoplastic markings;
- Add additional directional guide signs for I-95 on Route 110 after (east of) the Macy Street; and
- Install radar speed feedback signs on Route 110 east of Macy Street and west of I- 495.

Although these improvements are expected to be completed by the Rocky Hill Road development or the MassWorks grant project, the Applicant is willing to commit to complete a number of improvements in the unlikely event that neither of those projects are completed. The Applicant will commit to testing the vehicle detection system and repair or replace the associated detection equipment as needed on the Clarks Road approach to the intersection, review and adjust the "yellow" and "all red" clearance intervals, and reapply the crosswalk pavement markings with high visibility, ladder style thermoplastic markings.

VHB Response: As noted above, the short-term, low-cost measures identified in the RSA for the Route 110 (Macy Street)/Clark's Road intersection are planned to be implemented by the nearby Rocky Hill development. In the event that that project does not proceed in a timely manner, the Applicant has committed to implementing the specific measures identified above. This contingency will result in these existing deficiencies being addressed prior to Site occupancy.

Comment 6: Vehicle Speeds – The data collection for the study indicates that the current "85th percentile speed" on Clark's Road is 19 miles per hour (mph) heading northbound and 20 mph heading southbound. Both are lower than the posted 25 mph speed limit on this roadway. The exact location of these speed measurements is not identified. As speeds along this roadway may vary depending on the precise location, additional speed measurements should be conducted at an alternate location that would not be influenced by roadway curvature or proximity to Route 110 (Macy Street). The Project also should explore implementing traffic calming measures along Clark's Road between the Site driveway and Route 110 (Macy Street) to help maintain appropriate speeds within the neighborhood setting. These could include speed humps, speed feedback signs, or other measures. Additional potential sidewalk improvements are discussed in the Conclusion section of this memorandum.

Response: Vehicle speeds were collected on Clarks Road, approximately 150 feet south of Route 110, which is on a straight section of Clarks Road. Vehicle speeds were collected over a 48- hour period, capturing both peak and off-peak speeds. Generally, off-peak speeds are higher due to fewer vehicles on the roadway. The Clarks Road approach to the

intersection with Route 110 is going to be widened to extend the two-lane section approximately 250 feet back from Route 110. This improvement is proposed as part of the mitigation for the proposed Starbucks development on Clarks Road. When that is completed, there will be approximately 320 feet of roadway between the Project site driveway and the start of the two-lane section for the intersection. That 320-foot section has curvature, which naturally slows down drivers, leading to the intersection with Route 110. As the observed vehicle speeds were low, traffic calming measures on this short section of Clarks Road are unnecessary.

VHB Response: VHB acknowledges that the curvature of Clark's Road may naturally help to limit speeds in this area. However, there are segments of this roadway to the south near the Birchwood Point condominiums which are straight and could experience higher speeds. The Applicant has committed to installing new sidewalk on Clark's Road which will help provide improved pedestrian accommodations regardless of the specific speeds along the roadway.

Future Conditions

Comment 1: Future Traffic Growth – the TIA appropriately considers potential future traffic growth based on typical background growth and site-specific traffic generated by other planned development projects in the area. VHB agrees with both the 1.5-percent annual traffic growth rate identified and the list of six nearby development projects. Traffic assignment for the background project was done following accepted industry practices.

Response: No response required.

Comment 2: Planned Roadway Improvements – VHB agrees with the inclusion of both the planned Starbucks Clark's Road mitigation and the recently awarded MassWorks grant improvements at the Route 110 (Macy Street)/Elm Street/Clark's Road intersection as being significant future projects.

Response: No response required.

Comment 3: Project-Generated Traffic – Trip generation for the proposed 152-unit residential development was calculated appropriately based on the most recent version of the "Trip Generation Manual²" published by the Institute of Transportation Engineers (ITE). This database includes studies of several comparable residential developments and use of the ITE data is the accepted industry standard for estimating trip generation.

Response: No response required.

Comment 4: Trip Distribution and Assignment – The regional assignment of Project trips was based on U.S. census data and observed travel patterns. VHB agrees with this methodology. The resulting regional trip distribution is consistent with that used in the Rocky Hill Residential Development study noted earlier. However, Clark's Road also connects to Main Street to the south, which can be used to travel to/from other destinations to the east and west. To determine potential use of this road by the Project, VAI should conduct TMCs at the nearby Birchwood Pointe Condominium development. This information can be used to identify the north/south distribution of that site's trips, which should be similar to that of the Project.

Response: Peak-hour TMCs at the two driveways to the Birchwood Pointe development are scheduled to be counted December 11th and 13th. Once the data is received and processed, a summary of the northbound/southbound split on Clarks Road will be provided under separate cover.

VHB Response: VAI's January 7, 2026 letter summarizes peak-hour TMCs conducted at the driveways to the Birchwood Pointe development. These counts were conducted on Thursday, December 11, 2025 and Saturday,

December 13, 2025. The October 2024 Transportation Impact Assessment estimated that three-percent of Project traffic would be oriented to/from the south on Clark's Road. However, the December 2025 Birchwood Pointe counts indicate that 37 percent of that development's traffic is travelling to and from the south on Clark's Road. VAI's letter provided updated trip distribution estimates based on these counts along with the accompanying increases in traffic which would be expected on each study area roadway. With that assumed distribution, there would be increased traffic on Clark's Road, but with a corresponding proportional decrease on the other study area roadways. With traffic being shifted away from these study area intersections as opposed being increased, updated capacity analyses are not required for those locations.

VAI indicates that with the updated distribution, there would be an additional 20 to 22 peak hour trips on Clark's Road to the south of the site; roughly one additional vehicle every three minutes. While this is an increase from the original estimates, these nominal peak hour increases should not result in a significant impact on Clark's Road traffic operations. As shown by the April/May 2025 Clark's Road traffic counts, these increases are similar to the daily variation in peak hour volumes on this road and should not be perceptible. The 20 to 22 additional peak hour trips will be split between northbound and southbound traffic. With that, there would be between 8 to 16 peak-hour vehicles turning onto Main Street to the south. Considering that this volume will be divided further between left- and right-turn movements, the associated delays and queuing should not increase significantly due to this volume. No further analysis is required.

Comment 5: Future Traffic Volumes – Build Condition – VHB agrees with the documentation presented which indicates that the Project should result less than one-percent increase in traffic volumes compared to the 2032 No-Build condition. The Clark's Road increases should be revisited based on the trip distribution sensitivity analysis discussed under the previous comment.

Response: If the Birchwood Pointe development counts indicate a significant change in the trips directed to/from the south on Clarks Road, an updated peak-hour traffic-volume increase table will be provided.

VHB Response: As noted in the response to Comment 4, the traffic counts and associated analysis were provided for review. No further analysis is required.

Comment 6: Parking Generation – The potential parking demand for the Project was estimated using standard ITE parking data³ based on the 213 bedrooms proposed within the proposed 152- unit development. The ITE data reflects the parking demand for both residents and visitors at the sites in its database. The 85th percentile weekday parking demand would be 187 parked vehicles, which could be accommodated by the proposed parking supply. [The parking supply shown on the Project Site plans is shown as 203 spaces, and not the 209 spaces referenced in the TIA.] While not shown in the report, the estimated 85th percentile demand on a typical Saturday would be 164 spaces based on the number of bedrooms (though Saturday ITE data is limited to only one study). If parking generation was instead based on the proposed number of units and not bedrooms, the resulting weekday 85th percentile parking demand would be 220 spaces. As this slightly exceeds the proposed parking supply, this should be discussed further by the applicant. VHB expects that the actual parking demand may be lower based on other industry sources, but documentation of this should be provided. The use of compact spaces also should be reconsidered as they generally are less efficient while only resulting in a minimal number of additional spaces within the overall Site.

Response: The ITE parking analysis was carried out using bedrooms instead of units, as it typically gives a better estimation of the actual parking demand. A development could be all one- bedroom units, while another development with the same number of units is all two-plus bedroom units. The two developments would require a different parking demand. As such, the use of bedrooms provides a more accurate picture of the Project's parking demand. The Project

provides 203 spaces for 213 bedrooms/152 units, or 0.95 spaces per bedroom/1.34 spaces per unit. This parking supply is above the average parking supply provided at similar residential developments in Salem, Peabody, Beverly, and Danvers noted in the Perfect Fit Parking data from the Metropolitan Area Planning Council (MAPC). This study collected parking data at 31 residential developments in Salem, Peabody, Beverly, and Danvers, and the average parking supply was 1.16 spaces per unit, below the 1.34 spaces per unit proposed. In addition, the MAPC looked at parking demand. At the same 31 developments, the average parking demand was shown to be 0.85 spaces per unit. As is the case with these residential developments, we believe the parking demand for the Project will be below the proposed parking supply of 1.34 spaces per unit.

With regard to the use of compact spaces, it should be noted that compact spaces can accommodate most vehicles in use today. The 85th percentile composite vehicle as established by the National Parking Association has dimensions of 6'7" wide by 16'10" long. This composite vehicle size accounts for SUVs and CUVs, and is recommended to be used as the design vehicle for parking garages and surface lots. Based on this vehicle size, the compact space dimensions of 8'6" wide by 18' long can accommodate 85 percent of vehicles that are this size and below. Therefore, the use of compact spaces is appropriate for this site.

VHB Response: The additional information provided above documents the adequacy of the proposed parking supply and the appropriateness of the zoning relief requested. VHB understands the logic regarding compact spaces but believes that these should be discouraged due to the limited resulting benefits, and the potential for non-compact vehicles using these spaces if no other parking is available.

Sight Distance Evaluation

Comment 1: Sight Distance – both the stopping sight distance and intersection sight distance measurements were compared to industry standards⁴ based on the regulatory 25 mph speed limit for Clark's Road. This results in a conservative analysis as the actual travel speeds measured during the study's data collection were at or below 20 mph in both directions. The measured stopping sight distance exceeds requirements. The intersection sight distance looking to the south falls slightly below desirable levels. However, this should not pose safety concerns as the sight line still significantly exceeds the required stopping sight distance. VAI should confirm that any walls, plantings, or other potential visual obstructions do not impede the reported sight lines. Also, sight distance should be evaluated at the proposed garage exit within the Site to confirm that the retaining walls adjacent to the exit ramp do not impede visibility. If sight distance is constrained, mitigating measures should be proposed.

Response: As recommended in the traffic study, any signs or landscaping adjacent to the Project site driveway should be designed and maintained to ensure they do not restrict lines of sight. The Applicant's site plan conforms with requirements for and best practices related to preserving sight lines at both the Project entrance and the top of the garage ramp.

VHB Response: The height of the walls next to the top of the garage ramp should be provided so that the adequacy of the Site lines can be confirmed. In the absence of that information, any walls or plantings next to the ramp may need to be adjusted so that the Applicant's commitment to preserving sight lines is satisfied.

Traffic Operations Analysis

Comment 1: Analysis Results – The TIA analysis indicates that the Project will have a negligible impact at the Route 110 (Macy Street)/Carriagetown Marketplace signalized driveway. This is consistent with the relatively low volumes of Site traffic expected to pass through this intersection. Likewise, the Project should have a negligible impact

on the Route 110 (Macy Street)/I-95 South ramps intersection under its future signalized condition. The critical movement at the Route 110 (Macy Street)/I-95 North unsignalized intersection is expected to operate at LOS F under future conditions with or without the Project in place. The additional four to eleven Project peak hour trips added to this ramp approach will only be increase the projected ramp queues by a maximum of two vehicles. Regardless, delays on that approach already are projected to be excessive. This should be discussed further.

Response: The proposed MassWorks project that the City is undertaking is designed to address the queueing on Route 110 westbound, which impacts the off-ramp for I-95 northbound. The addition of the third westbound travel lane and the signalization of the I-95 southbound ramps intersection will increase capacity and allow more vehicles to exit the I-95 northbound ramp. Synchro was used for the analysis, which is standard practice for traffic studies. Synchro assesses each intersection as a discrete location, and therefore, the impact of the improvements at the intersection of Route 110 at Clarks Road/Elm Street and Route 110 at I-95 southbound ramps is not realized in the level of service and queueing result for the intersection of Route 110 at I-95 northbound ramps. In, addition the 4-11 vehicle per hour added to that movement from this Project equates to 1 vehicle every 5 to 15 minutes.

VHB Response: No response required.

Comment 2: Route 110 (Macy Street)/Elm Street/Clark's Road analysis results – The TIA 2032 No- Build and 2032 Build conditions analysis reflect the planned MassWorks improvements for the Route 110 (Macy Street)/Elm Street/Clark's Road intersection. The capacity analysis indicates that the Project will not change the reported level of service (LOS) for any intersection movements. [Note: Table 9 mistakenly shows the Elm Street southbound left- turn movement degrading to LOS F, while it actually remains unchanged at LOS E.] The northbound Clark's Road left-turn movement is expected to operate at LOS E during each peak hour under the 2032 Build condition. The adjacent northbound through-/right-turn movement is projected to operate at LOS B, LOS A, and LOS B during the respective weekday morning, weekday evening, and Saturday midday peak hours. The Project is expected to increase peak-hour vehicle queues on this approach by no more than one vehicle. These impacts should not require mitigation beyond the improvements already planned in this area.

The maximum queue on the northbound Clark's Road approach (194 feet during the weekday evening peak hour) will extend beyond the roughly 150-foot segment having at least a 20-foot width as it approaches the signal. As the planned Clark's Road roadwork extends less than 100 feet to the south of the signalized intersection this condition will not change. Accordingly, the northbound left-turn queue will likely extend beyond the available storage and block access to the adjacent through-/right-turn lane. This only will occur with the 95th percentile queue under peak hour conditions, and not with the average queue length. The estimated queues will not extend to the Burger King parcel driveway or Starbucks driveway, both of which are located at least 220 feet to the south of Route 110 (Macy Street).

Independent of this Project, it may be beneficial for "DO NOT BLOCK INTERSECTION" pavement markings to be installed at the Starbucks driveway to help avoid southbound left- turns from being able to turn into that site.

Response: VAI concurs that the intersection of Route 110 at Clark Road/Elm Street does not require mitigation beyond the improvements already planned in the area.

The proposed improvements on Clarks Road to be completed by the Starbucks development will extend the two-lane section of Clarks Road to 250 feet south of Route 110, which is more than 50 feet beyond the 194-foot maximum queue shown in the report.

VAI concurs that, independent of this Project, it may be beneficial to install "DO NOT BLOCK INTERSECTION" pavement markings at the Starbucks driveway.

VHB Response: VHB's original review was based on the Clark's Road lane configuration presented in the October 2025 TIA. Since that time, VHB has reviewed more recent analysis prepared in support of the planned MassWorks improvements. The northbound Clark's Road approach now will consist of a shared left-/through-lane and an exclusive right-turn lane. The maximum vehicle queue on that approach still is not expected to exceed 194 feet under the 2032 Build condition with mitigation. The northerly edge of the Starbucks driveway is located roughly 245 south of the Clark's Road stop line at its intersection with Route 110 (Macy Street). The roadway widening referenced above which currently is under construction only appears to extend 150 feet to the south of the intersection before starting its taper back to a single lane. Regardless, the projected vehicle queue still should not extend back to the Starbucks driveway so no further physical modification should be required.

Comment 3: Clark's Road/Proposed Site driveway – the TIA did not include capacity analysis for the intersection of Clark's Road with the proposed Site driveway. Peak hour volumes on Clark's Road are expected to range from 424 to 554 vehicles. While exiting Site traffic almost entirely would be turning right, likely with low delays, expected operating conditions should be documented by VAI in the form of unsignalized capacity analyses for this location.

Response: The analysis for the Project site driveway's intersection with Clarks Road was mistakenly left out of the traffic study. Table 1 below provides a summary of the intersection's level of service.

As can be seen in Table 1, under 2032 Build conditions, the southbound left-turn movement operates at LOS A during weekday morning, weekday evening, and Saturday midday peak hours, and the westbound left/right-turn movement operates at LOS B or better. Vehicle queues are expected to be less than one vehicle.

VHB Response: No response required.



Memorandum

Table 1 CLARKS ROAD AT PROJECT SITE DRIVEWAY CAPACITY ANALYSIS SUMMARY

Unsignalized Intersection/ Critical Movement/Peak Hour	2025 Existing				2032 No-Build				2032 Build			
	Demand ^a	Delay ^b	LOS ^c	Queue ^d	Demand	Delay	LOS	Queue	Demand	Delay	LOS	Queue
Clarks Road at Site driveway												
<i>Weekday Morning:</i>												
Project Site Driveway WB LT/RT									43	9.8	A	5
Clarks Road SB LT									13	7.7	A	0
<i>Weekday Evening:</i>												
Intersection is constructed under 2032 Build Conditions												
Project Site Driveway WB LT/RT									21	9.6	A	3
Clarks Road SB LT									36	7.7	A	3
<i>Saturday Midday</i>												
Project Site Driveway WB LT/RT									27	13.4	A	5
Clarks Road SB LT									27	7.9	A	3

a Demand in vehicles per hour.

b Delay in seconds per vehicle.

c Level of service

d 95th percentile queue length (feet).

Conclusion

In addition to the analysis revisions requested above, the proponent should consider the following mitigation measures beyond those currently proposed:

Comment 1: In the event that the proposed Rocky Hill Residential development should not proceed in a timely manner for any reason, this Project's proponent should commit to implementing the short-term, low-cost measures identified in the RSA conduct on behalf of that project. That mitigation would be limited to the Route 110 (Macy Street)/Elm Street/Clark's Road intersection only.

Response: See response to Existing Conditions Section Comment 4.

VHB Response: No response required.

Comment 2: The Project should explore implementing traffic calming measures along Clark's Road between the Site driveway and Route 110 (Macy Street) to help maintain appropriate speeds within the neighborhood setting.

Response: The Clarks Road approach to the intersection with Route 110 is going to be widened to extend the two-lane section approximately 250 feet back from Route 110. This improvement is proposed as part of the mitigation for the proposed Starbucks development on Clarks Road. When that is completed, there will be approximately 320 feet of roadway between the Project site driveway and the start of the two-lane section for the intersection. That 320-foot section has curvature, which naturally slows drivers down leading to the intersection with Route 110. As the observed vehicle speeds were low, traffic calming measures on this short section of Clarks Road are unnecessary.

VHB Response: While not directly helping to reduce speeds on Clark's Road, the proposed sidewalk will provide improved pedestrian accommodations in this area.

Comment 3: The concept plans submitted with the MassWorks grant application for the Route 110 (Macy Street)/Elm Street/Clark's Road intersection noted that the sidewalk along the east side of Clark's Road should be extended to the Project Site driveway. However, the subsequent 25% design plans reviewed by MassDOT did not depict this. Discussion of the status of that potential sidewalk work should be provided. If these potential sidewalk improvements did not proceed for any reason (which appears unlikely with the grant having been secured), this work should be undertaken by the Project. This work would be limited to sidewalk improvements that could be implemented within the Clark's Road right-of-way.

The City is currently planning for improved sidewalks for the full length of Clark's Road. Potential future work to be undertaken by the City would include a new sidewalk along the westerly side of the road from Main Street to the Birchwood Pointe Condominium complex area. Whether the sidewalk work along the easterly side of the road to the north is undertaken by the MassWorks improvements or by the Project, that sidewalk should continue to the condominium development's westerly driveway. A new raised crosswalk should be provided at that location connecting to the City sidewalk project on the opposite side of the road. Any new sidewalks should be approximately eight feet wide (as allowed by available right of way) in light of the increased residential population in this area. Any new sidewalks should be positioned to allow for potential roadway widenings which may be required in the future so that the new sidewalk would not need to be replaced.

Response: The MassWorks grant includes installing a new sidewalk on the east side of Clarks Road from the Starbucks property to the residential driveway at 29 Clarks Road. That being said, the Applicant has committed to replacing the existing sidewalk to City standards from the Project site driveway to Route 110 in the event some or all of that sidewalk is not replaced during the Starbucks work and/or the MassDOT intersection improvements.

The Applicant is also willing to upgrade the existing sidewalk between the Project site driveway and the closest Birchwood property driveway to City standards.

Providing a raised crosswalk at the Birchwood property driveway to cross Clarks Road is unnecessary. There is no reason to cross Clarks Road at this location when there will be sidewalks on both sides of Clarks Road between the Birchwood Property and Route 110. Pedestrians on either side of Clarks Road could walk up to Route 110, and from there they could head east, west, or north to their desired destination and use the signalized pedestrian crossings at the intersection of Route 110 at Clarks Road/Elm Street.

VHB Response: With the Applicant's commitment to install the new sidewalk on Clark's Road there still will not be any sidewalk on the northwesterly side of the roadway for most of its length. As such, there may be some demand to cross the roadway prior to Route 110 (Macy Street). In conjunction with the final sidewalk installation, whether that be on the easterly or westerly sides of Clark's Road, this crossing should be installed by whoever is undertaking that final construction.

Project Site Plans

This memorandum also includes a technical review of the transportation aspects of the Project Site plans prepared by The Morin-Cameron Group, Inc., dated September 29, 2025. VHB's December 2, 2025 civil engineering and stormwater review memorandum already provided comments regarding several transportation-related elements of the Site plans. VHB also is providing the following additional comments for consideration:

Comment 1: As noted in the TIA, the applicant should commit to not having any walls, plantings, or other potential visual obstructions near the Site driveway impeding the reported sight lines. Also, sight distance should be evaluated at the proposed garage exit within the Site to confirm that the retaining walls adjacent to the exit ramp do not impede visibility.

Response: The Applicant's site plan conforms with requirements for and best practices related to preserving sight lines at both the Project entrance and the top of the garage ramp.

VHB Response: The height of the walls next to the top of the garage ramp should be provided so that the adequacy of the Site lines can be confirmed. In the absence of that information, any walls or plantings next to the ramp may need to be adjusted so that the Applicant's commitment to preserving sight lines is satisfied.

Comment 2: A crosswalk should be installed across the proposed garage ramp driveway at its intersection with the east/west parking lot circulation aisle.

Response: A crosswalk has been added to the plan at the top of the garage ramp.

VHB Response: VHB has reviewed the Applicant's latest Site plans updated through December 17, 2025 which show the new crosswalk. The crosswalk should be shifted to the south so that there is four feet of separation between the Stop line and the southerly edge of the crosswalk. AAB-compliant treatments should be provided on both ends of the crosswalk similar to that found through the rest of the Site.

Comment 3: VHB's civil engineering/stormwater review memorandum provided comments regarding the proposed 40-foot long loading space. In addition to responding to those comments, the applicant also should provide any expected operational measures which may be required to accommodate residents moving in or out of the development. These could include requiring some parking spaces temporarily being blocked off to allow for moving activities, or other temporary measures.

Response: Given the space available for loading at both ends of the multifamily building, the Applicant does not expect to block spaces during moving activities.

VHB Response: The Applicant should discuss how move-in/move-out activities are managed at other existing properties controlled by the Applicant. While this activity occurs at any residential site, there is limited room to accommodate delivery trucks, which should be discussed.

Comment 4: The Project's parking management should be discussed in terms of if parking stickers or other means will be provided to control parking. Consideration should be given to unbundling parking from the leasing of units so that any residents choosing not to own a vehicle would not have to lease a space. Discussion should be provided regarding if any parking spaces will specifically be designated for visitors, or if an open parking supply would be preferred.

Response: Visitor parking spaces will be designated near the amenity area. Parking stickers, further visitor parking designation, or "unbundling" parking from rent as suggested by VHB, which Applicant assumes would mean charging separately for all parking spaces (and which Applicant is not intending to do), are business and management decisions that will be made and evaluated by Applicant and management from time to time as necessary.

VHB Response: No response required.