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**CONCORD PUBLIC WORKS  
ENGINEERING DIVISION**

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133 Keyes Road  
Concord, MA 01742



**DATE: 11/21/2022**

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**MEMORANDUM**

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**TO:** Elizabeth Hughes, Town Planner  
**TO:** Delia Kaye, Natural Resources Director  
**COPY:** Alan Cathcart, Director of Public Works  
**VIA:** Steve Dookran, P.E., Town Engineer  
**FROM:** Justin Richardson, P.E., Assistant Town Engineer  
**SUBJECT:** Concord Academy: ZBA Special Permit, Site Plan Approval Application, and Notice of Intent

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Concord Public Works (CPW) Engineering Division has reviewed the Notice of Intent and the ZBA Special Permit and Site Plan Approval Application, Plans, Calculations and Reports for Concord Academy West Campus, which were prepared by the Applicant, Don Kingman, and the design team, dated July 28, 2022, July 15, 2022, July 2022, and July 13, 2022, and provided comments dated August 31, 2022, seen below in bold and dated. The Applicant provided revised supplemental plans, reports, and calculations with a response letter to Engineering's comments, which were dated September 15, 2022 and September 16, 2022, respectively and seen below in italics and dated. Engineering provided a comment letter dated September 26, 2022 seen below in bold and dated. The Applicant provided revised supplemental plans, reports, and calculations with a response letter to Engineering's comments, which were dated October 10, 2022, October 4, 2022, October 28, 2022, and October 5, 2022 respectively and seen below in italics and dated. Engineering provided a comment letter dated November 4, 2022 seen below in bold and dated. The Applicant provided a response letter to Engineering's comments, which were dated November 14, 2022 seen below in italics and dated. The Engineering Division offers the following in bold and dated:

Engineering Division Comments (8/31/2022)

- 1. Please provide a Stormwater Pollution Prevention Plan (SWPPP) and make the appropriate filings with National Pollutant Discharge Elimination System (NPDES) for the site alterations that are to be performed. (8/31/2022)**
  - Applicant response 9/15/22: The applicant recognizes that the project will disturb more than one acre of land and will require coverage under the NPDES Construction General Permit (CGP). As part of this permit a site specific SWPPP is required.  
The project is a large-scale project and will require coordination of logistics with the Owner, project design team and contractor. At this time has been no contractor chosen for the project. Prior to the start of construction, a SWPPP will be prepared, in coordination with the project team, and the appropriate NOI for coverage under the CGP will be filed. The applicant will provide a copy of this filing and the SWPPP to the Town. (9/16/2022)*
  - Comment has been addressed and should be a condition of approval. (9/26/2022)**
- 2. The Traffic Study is required to determine if additional traffic will be generated by the development, and it should include trip generation for each driveway, peak hour volumes, estimated traffic for special events, frequency of events, and does the housing being moved**



- affect the traffic volume for different driveways. Line of sight determinations for all driveways being utilized or improved should also be determined. (8/31/2022)**
- *Applicant response 9/15/22: The applicant is in the process of retaining a traffic engineer and the requested report will be submitted as soon as its complete. (9/16/2022)*
    - **CPW Engineering will review the report when it becomes available (9/26/2022)**
      - **The report was reviewed and comments are below. (11/4/2022)**
- 3. A Right of Way (ROW) and/or Driveway permit is required for the work being performed on Main Street and work inside the right of way shall comply with CONCORD PUBLIC WORKS DESIGN & CONSTRUCTION STANDARDS & DETAILS. This includes ADA compliant ramps at all driveway entrances. (8/31/2022)**
- *Applicant response 9/15/22: The applicant will obtain a ROW and/or Driveway permit from CPW prior to starting work. All will comply with Concord Public Works Design & Construction Standards and Details. (9/16/2022)*
    - **Comment has been addressed and should be a condition of approval. (9/26/2022)**
- 4. The accessible space at the southeasterly edge of the parking lot do not appear to be graded at 2% or less. (8/31/2022)**
- *Applicant response 9/15/22: Additional grading detail as well as a note has been added to sheet C-003 indicating a maximum grade for the accessible spaces. (9/16/2022)*
    - **Comment has been addressed. (9/26/2022)**
- 5. Please explain why in HydroCAD the Dynamic Storage-Indication method was used instead of the more typical Storage-Indication method? (8/31/2022)**
- *Applicant response 9/15/22: We typically use this method to account for tailwater conditions within a system that can affect the flow through a system. The following is a description from HydroCAD about this method. "A dynamic routing method also calculates the nodes in flow order, but evaluates every node at each time step. This allows each node to respond to other conditions, such as varying tailwater or pump switching. For these situations, HydroCAD provides the Dynamic Storage-Indication method. DSI uses the same calculations as the Storage-Indication method, but permits automatic tailwater capabilities by updating the routing curves at each time step."*

*However, as required in the Town's drainage standards, the calculations have been revised using the Storage-Indication method. (9/16/2022)*

    - **With the majority of the ponds having free discharge to reaches, and not many ponds in series except for drain manholes modeled as ponds the SI method is adequate for this project. Comment has been addressed. (9/26/2022)**
- 6. Please explain why in HydroCAD the Lag/CN method was used in calculating the Tc instead of the more typical TR-55 method? Additionally, on the Pre and Post Development Subcatchment Plan please label the "longest flow path" lines so that it is clear what was used in the calculations. (8/31/2022)**
- *Applicant response 9/15/22: We typically use the Lag method as a simpler estimate of the Tc and this method is allowed in the MADEP Stormwater Handbook. However, the stormwater calculations were revised using the TR-55 method and the longest flow paths have been labeled on the Subcatchment plans. (9/16/2022)*



- **In the Pre-development and the Post-development conditions it is rare to have a sheet flow length of more than 50-feet this occurs multiple times in the pre and post drainage plans. Please either provide an explanation as to why the sheet flow lengths are so long or revise the calculations to have sheet flow lengths closer to 50-foot max. Also, the Tc for Subcatchment A1 would become channelized at approximately elevation 117 in the grassed swale. (9/26/2022)**
  - *Applicant response 10/5/22: The TR-55 User Guide, published January 2009 by the NRCS limits sheet flow in Time of Concentration (Tc) calculations to 100 feet. We have revised the Tc calculations to reduce the sheet flow lengths to generally 50' or less with the exception of a couple of location where a little bit longer sheet flow length (but less than 100 feet) is warranted. We have also revised the Tc calculation for A1 to use a channel flow where it enters the existing swale at the end of the flow path. (10/5/2022)*
    - **Comment has been addressed (11/4/2022)**
  
- 7. The Plastic Grid Reinforced Lawn, Permeable Concrete Unit Pavers, and Stabilized Stone Dust Paving while still pervious should be called out separately in the Subcatchments with the appropriate curve number that is based on the compacted base. (8/31/2022)**
  - *Applicant response 9/15/22: The stormwater calculations have been revised with the areas of reinforced lawn, permeable pavers and stone dust areas have been separated out and classified as "gravel. (9/16/2022)*
    - **Comment has been addressed. (9/26/2022)**
  
- 8. Inspection reports from the LTOMP are to be submitted to the CPW Engineering Division annually. (8/31/2022)**
  - *Applicant response 9/15/22: Comment noted. The applicant will submit all required reports and inspections. (9/16/2022)*
    - **Comment has been addressed and should be a condition of approval. (9/26/2022)**
  
- 9. The Water Quality Swale (that is essentially a Basin), basins and Sediment Forebay need to be detailed. These area shall comply with CPW Design and Construction Standards, Sections 2 "Drainage Standards". Currently, the basin does not have an emergency overflow and the appropriate amount of freeboard. In the 100 year storm event the basins overtop according to the calculations. Please revise the drainage calculations to incorporate the changes necessary to comply with CPW Design and Construction Standards. (8/31/2022)**
  - *Applicant response 9/15/22: Water quality swale A has been revised to eliminate the outlet structure in favor of a longer conveyance with stone check dams to retain flow for treatment. Swale B has been revised to provide 1' of freeboard and a second area drain outlet structure has been added to serve as an emergency overflow. A detail for the sediment forebay outlet has been added to the Sheet C-008 and Sheet C-011 has been added to the plan set with details and sections for the swales. (9/16/2022)*
    - **Comment has been addressed. (9/26/2022)**
  
- 10. Water Quality Volume calculations should be provided. (8/31/2022)**
  - *Applicant response 9/15/22: Water quality volume calculations have been included in Appendix D of the revised stormwater report. (9/16/2022)*
    - **Comment has been addressed. (9/26/2022)**

**11. Why is no sediment Forebay provided for Basin B? Stormwater runoff from the driveway of #228 Main Street flows into the basin. (8/31/2022)**

- *Applicant response 9/15/22: Because of the sheet flow into the basin, a forebay is not practical for this basin. Alternatively, in combination with sediment removal from the moderately sloped lawn and landscape area upgradient of the basin, a pea stone diaphragm has been added to the top of the basin slope to help filter stormwater entering the basin. (9/16/2022)*
- **Comment has been addressed, but recommend increasing the width of the diaphragm to 2 feet. (9/26/2022)**
  - *Applicant response 10/5/22: We have increased the width of the stone diaphragm as recommended. (10/5/2022)*
  - **Comment has been addressed (11/4/2022)**

**12. A groundwater mounding analysis is required for all stormwater infiltration areas with less than 4-foot separation from estimated seasonal high ground water. (8/31/2022)**

- *Applicant response 9/15/22: The mounding calculations using the Hantoush Method for the proposed infiltration basins (Subsurface Infiltration Basins 1 and 2) can be found in Appendix D in the revised Stormwater Report. These calculations show that the groundwater mound below the infiltration basins will not reach a breakout level. (9/16/2022)*
- **Comment has been addressed. (9/26/2022)**

**13. The Subsurface Infiltration System is required to have an overflow per the CPW Design and Construction Standards, Sections 2 “Drainage Standards”. (8/31/2022)**

- *Applicant response 9/15/22: The Infiltration System 1 has been revised to include a grated opening on the inspection port in the northwest corner of the system where the grade is lowest. This will serve as an overflow for the system as well have aid in system venting. The downspout boot detail has been revised to specify an overflow that will spill to the ground is the system backs up. (9/16/2022)*
- **Comment has been addressed. (9/26/2022)**

**14. The Stormwater Report should provide rational method calculations in accordance with Concord Public Works Design & Construction Standards & Details, Section 2 - Drainage Standards requires “rational method for a 100 year frequency storm event”. Please provide these calculations, and also ensure that the grate capacities for catch basins are not exceeded. (8/31/2022)**

- *Applicant response 9/15/22: The required grate capacity and stormwater conveyance calculations using the rational method are included in Appendix C of the revised stormwater report. (9/16/2022)*
- **Comment has been addressed. (9/26/2022)**

**15. Flood Plain fill areas should also include at least portions of the emergency access road. CPW Engineering requires AutoCAD design plans that include the existing and proposed surfaces to confirm the flood plain alteration. Please provide AutoCAD .dwg files for review. (8/31/2022)**

- *Applicant response 9/15/22: Sheet C-009 has been revised to include the additional fill and compensatory storage area. The AutoCAD file will be forwarded directly to Engineering. (9/16/2022)*

- **The Town’s Zoning Bylaw under Section 7.2 Flood Plain Conservancy District requires the following: “Plans showing compensatory storage at a 1.5:1 ratio for floodplain displaced by the proposed project, prepared by a registered professional engineer, detailed in tabular format, in 1-foot incremental elevations of fill and storage volumes in cubic feet, with cut and fill areas shown on a plan. The 1.5:1 Compensatory storage ratio does not need to be obtained at each 1-foot increment and may be obtained as a total over the floodplain area, but a minimum of 1:1 ratio shall be maintained at all 1-foot increments;” Calculations were provided but they are not in volumetric units, and there is no documentation of the 1.5:1 ratio where provided. In using the CAD file provided Engineering obtaining a ratio of approximately 1.3:1. Please provide revised calculations as requested per the Bylaw. (9/26/2022)**
  - *Applicant response 10/5/22: We have revised some of the grading in the CAC parking lot to lessen the amount of fill and increase the compensatory storage to meet the 1.5:1 ratio required by the bylaw. Calculations are shown on Sheet C-009 and the CAD file has been provided to Engineering. (10/5/2022)*
    - **Comment has been addressed (11/4/2022)**

**16. The Engineering Divisions reserves the right to comment on future submittals related to any new or previously submitted information provided to the Town for review. (8/31/2022)**

- *Applicant response 9/15/22: Comment Noted. (9/16/2022)*
  - **Comment remains pertinent. (9/26/2022)**

Engineering Division Comments (9/26/2022)

**17. The discharge location for “Filter Strip A8” flows over the “Constructed Grass Paved Fire Lane” that is also a walkway/driveway. This could cause an issue during high storm events or icing conditions. Recommend either elevating the roadway and piping the discharge under the fire lane or obtaining Concord Fire Department approval of the condition. (9/26/2022)**

- *Applicant response 10/5/22: The Sheet C-003 has been revised to add 3-8” pipes to outlet the area bounded by the fire lane and the Academy Village parking. These culverts have been modeled in HydroCAD to ensure the area will not over top for the 100-year storm. (10/5/2022)*
  - **Comment has been addressed. (11/4/2022)**

**18. Provide a detail of the DMH P2 showing the weir construction. (9/26/2022)**

- *Applicant response 10/5/22: A detail for DMH P2 has been added to Sheet C-008. (10/5/2022)*
  - **Comment has been addressed. (11/4/2022)**

**19. Please identify material stock pile areas on the Site Preparation Plan. Also, add a note to avoid heavy equipment in the infiltration areas. (9/26/2022)**

- *Applicant response 10/5/22: We have added a note to Sheet C-003 indicating the infiltration areas shall not be used for stockpiling and heavy equipment should avoid these areas. Additionally, we have discussed the location of stockpiles and laydown areas with the Natural Resources Director. We have indicated that the project will be complex and multi-phased and it is likely that most areas within the disturbed limit of work will be used for temporary stockpiles and/or material storage laydown areas. A contractor has not been selected yet to provide logistic plans. We have proposed a condition to limit the areas used for stockpiling and will*

*provide a construction staging plan and schedule to the town prior to the pre-construction site visit. (10/5/2022)*

- **Comment has been addressed. (11/4/2022)**

**20. The 118 Contour around the Water Quality Swale is incorrect. It crosses the Fire Lane at the “118.0 (ex)”, but also continues on and closes on its self in the swale. Please revised the grading of the swale.**

- *Applicant response 10/5/22: The contour have been corrected on Sheet C-003. (10/5/2022)*
- **Comment has been addressed. (11/4/2022)**

**21. On the “FLOODPLAIN IMPACT AND MITIGATION PLAN” the Legend in the “Floodplain Fill Areas” has two green hatches. It is presumed that the 120.0-120.3 has is supposed to be magenta and not green, but please revise the plan for the final plan set.**

- *Applicant response 10/5/22: The legend has been corrected on Sheet C-009. (10/5/2022)*
- **Comment has been addressed. (11/4/2022)**

Engineering Division Comments (11/4/2022)

**22) In the October 28, 2022 Transportation Impact Assessment it is stated that the project will reduce the number of campus parking spaces from 204 to 147 and that “a potential parking deficit of 24 spaces may exist during the peak parking demand period to accommodate actual observed parking demands within the campus”.**

**a) How is the parking deficit being addressed? (11/4/2022)**

*i) The estimated parking deficit during peak times will be easily accommodated within the 240 parking spaces available within a 5 minute walk to campus according to a parking demand study conducted by VAI in 2019 for the Concord Free Library. The Data table below illustrates the observed use of parking on-campus and along Main Street between Sudbury Road and Thoreau Street for the week of 4/25 2022. During this observed period, assuming the post-construction condition with 147 spaces on campus, a projected Main Street Parking use reaches a maximum demand of 24 spaces (Noon Wednesday, and Noon Friday). This will be easily accommodated within the observed available parking along Main Street between Sudbury Road and Thoreau Street.*

Observation Period	Zoning Parking Requirement	Observed On Campus Utilized	Proposed On Campus Count	Projected Main Street Parking Use	Observed Available Main Street Parking	Delta (Projected Use vs. Observed Available)
4/25 - 9:00:00 AM	204	148	147	1	56	55
4/25 - 12:00:00 PM	204	158	147	11	44	33
4/25 - 3:00:00 PM	204	140	147	0	60	60
4/26 - 9:00:00 AM	204	167	147	20	33	13
4/26 - 12:00:00 PM	204	167	147	20	26	6
4/26 - 3:00:00 PM	204	151	147	4	54	50
4/27 - 9:00:00 AM	204	160	147	13	54	41
4/27 - 12:00:00 PM	204	171	147	24	37	13
4/27 - 3:00:00 PM	204	141	147	0	56	56
4/28 - 9:00:00 AM	204	114	147	0	86	86
4/28 - 12:00:00 PM	204	166	147	19	26	7
4/28 - 3:00:00 PM	204	160	147	13	43	30
4/29 - 9:00:00 AM	204	154	147	7	54	47
4/29 - 12:00:00 PM	204	171	147	24	45	21
4/29 - 3:00:00 PM	204	144	147	0	52	52

*(11/14/2022)*

- If week of 4/25/2022 was an average school week, then response is accepted. (11/21/22)

**b) Where will the 155 faculty and staff mentioned in the assessment park during the deficit times?**

- i) *Full-time faculty/staff are typically accommodated on campus and part-time faculty primarily utilize on-street parking if on campus parking is not available. (11/14/2022)*

**c) Additionally, do any students drive to school, and how many school visitors are there on a daily basis?**

- i) *Of our 400 student population, 155 live at the school and they are not allowed to have vehicles. Of the roughly 245 day students we estimate almost 100 take advantage of the MBTA Commuter Rail service with the remainder car pooling, being dropped off, or driving to school. It is difficult to estimate the number of campus visitors due to the seasonality of these visits. It's important to note that the applicant does not anticipate any increase to the student or adult population as part of this project, just a redistribution of the population on campus. (11/14/2022)*

- **It is understandable that the number of visitors vary by season. The Town's biggest concern will be when the number of visitors is highest and how the street is impacted. It was expected that the academy possessed such data for planning purposes. Traffic and parking in the vicinity of the Town Center continues to be concern for the CPW Engineering Division, and the development will reduce the amount of parking currently on campus, which will increase the use of Main Street and its on-street parking. The Zoning Board of Appeals must consider this ongoing concern if they approve the application. (11/21/2022)**

**23) A further zoning relief request for parking will result in a total relief of 54%, which seems excessive? How common is this for institutions like Concord Academy?**

- *The proposed relief of 204 spaces is based on removal of boarding students from the calculation (who are not allowed to have a vehicle) and removal of faculty/staff who live on campus from the count as they are currently accounted for in the staff/faculty counts. CA has historically been granted relief on this basis by the Planning Board (1990 and again in 1998). Concord Academy is looking for parking relief for an additional 10 parking spaces over what has been previously granted representing a 9% increase from relief previously granted. (11/14/2022)*
- **Granting a total parking relief that may be excessive is a decision of the Zoning Board of Appeals. In making its decision, CPW Engineering requests that the Board consider the fact that traffic and parking in the vicinity of the Town Center continues to be concern and the development will reduce the amount of parking currently on campus, which will increase the use of Main Street and its on-street parking. (11/21/2022)**

**24) Can the dispersing of trips at the two main gates with on-site circulation be demonstrated graphically?**



- *It's important to note that the applicant does not anticipate any increase to the student or adult population as part of this project. Parking will be redistributed as outlined in the table below. We anticipate that the dispersion of trips between gates will correlate with this redistribution (illustrated as a percentage below). (11/14/2022)*

Location	Current Served Parking Spaces	Current Served Parking (percentage of total)	Proposed Served Parking Spaces	Proposed Served Parking (percentage of total)
East Gate	33	16%	33	16%
Phelps Gate (Existing West Gate)	128	63%	24	12%
New West Gate	8	3%	58	28%

(Note: 35 other spaces are distributed around the campus accessed at other locations)

- **Comment has been addressed (11/21/2022)**

**25) The Transportation Impact Assessment states that “the Project will not result in a material increase in traffic or parking demands over that associated with current campus activities”, but during the summer camp season (drop off and pickup) there is an existing traffic issue that exists. The reduction of on-site parking will only exacerbate this issue. What traffic mitigation(s) is planned during the summer camp season?**

- *The Transportation Impact Assessment did not look at the camp drop off or pick up as it had not been brought to the attention of Concord Academy that this was a concern. With two distinct East and West gates we anticipate being able to disperse the pick up and drop off activities more effectively than we are currently. Before any plans are finalized we will review these proposals with the Community Safety Officer of Concord Police department. Camp queuing capacity: East Gate = 58, West Gate = 35. (11/14/2022)*
- **Comment has been addressed as long as this is acceptable to the CPD Safety Officer. (11/21/2022)**

**26) The Transportation Impact Assessment states “When special events are scheduled at the campus, they are typically scheduled in the evening or on weekends ...” If the site plan is approved, a condition is should be added to strictly limit special events to evenings and weekends.**

- *As an educational institution Concord Academy is aware of their neighborhood impact and works collaboratively with other non-profits in the area to coordinate events and parking. It's important to note that the Centennial Arts Center has a playhouse that seats 175, with a recital hall that seats 125. These capacity numbers are 25% less than the existing 400 seat Performing Arts Center. (11/14/2022)*
- **In the response, the applicant did not state that they objected to the suggested condition. However, CPW Engineering is modifying the condition of approval to state that “special events expected to have an excessive attendance are limited to evenings and weekends”. (11/21/2022)**





**27) What is the difference between the two peak demand periods (12 pm Wednesdays and Fridays, and 12 pm Tuesdays and Thursdays) for parking mentioned?**

- *This is related to the academic block schedule and the number of part-time employees we have teaching electives on those days. (11/14/2022)*
- **Comment has been addressed. (11/21/2022)**

**28) Is there any information to substantiate that the 240 available on street parking spaces in a 5-minute walking distance identified in the 2019 parking demand study are still available?**

- *We are not aware of any development projects that have occurred in the immediate vicinity since the 2019 parking demand analysis was completed that would result in a significant change in the availability of parking in the area. That being said, even with a modest reduction in the number of available parking spaces that were observed as a part of the 2019 observations, there would continue to be more than sufficient public parking available to support the 24 parking space deficit. (11/14/2022)*
- **Apart from responding that they are not aware of other development projects in the vicinity that offers the 240 available spaces in 2019, the applicant's traffic consultant should inform the board whether there are no concerns about that number being reduced due to changes in the recent past on patterns related to traffic, commuting, and parking needs of retain and other establishments, etc. (11/21/2022)**

**29) Because of the concern that on-street parking may not be adequate for the proposed changes and the drop off/pick up problems will grow worse, a post construction review of the traffic and parking after 6 months of issuing occupancy should be performed and reported to the Town.**

- *Concord Academy will continue to work cooperatively with the town on partnering and developing solutions to any parking impact that may come out of this project. (11/14/2022)*
- **If the concern brought up by this comment is realized and results in the need for a review by the applicant, this should be a condition of approval. (11/21/2022)**

**30) In the October 28, 2022 Transportation Impact Assessment it is stated "Lines of sight at the intersections of Main Street with the relocated West Gate and the reconstructed (widened) west driveway will meet or exceed the recommended minimum sight distance for safe operation with consideration of prohibiting parking within 20 feet of the driveways." How this 20 foot is prohibited parking being addressed? Are existing parking space revisions required? Does VAI recommend any other parking layout changes to improve safety? If so they should be shown on the plans for review, and these changes should be included in the Right of Way (ROW) and/or Driveway Permit Application to CPW.**

- *The applicant has reviewed the sitelines of the two western driveways that are part of this project and it is recommending the elimination of the parking space immediately west of the drive at both driveways to create the necessary 20' siteline. As part of this application it is proposed that moving the entrance of the existing West Gate driveway to the west opens up 20' of siteline to the east where the driveway entrance was. On the new proposed West Gate entrance there is no parking immediately to the east which provides more than 20' of sightlines. This will result in a net loss of 2 spaces on Main Street. There is a possibility that a relining of parking on the north side of Main St from the proposed West gate towards 252/262 Main St could recapture one of the proposed eliminated parking spaces. (11/14/2022)*



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- **The applicant should also demonstrate that the proposed driveway improvements still have the adequate Intersection sight distance and an unimpeded sight triangle that correlates with the roadway speed (11/21/2022).**

**31) In VAI's review of the existing conditions of the street proximate to the campus, have they identified any safety issues with pedestrian crossings and bicycle use given that nearby locations are listed as "high bicycle crash cluster locations"?**

- *VAI has provided recommendations as they relate to the changes to the access to the campus that are associated with the Centennial Arts Center which are documented in the October 28, 2022 Transportation Impact Assessment. The internal campus roadway network will be a minimum of 20 feet in width and the parking layout will meet the requirements for safety and maneuverability. The Fire Dept has been consulted on the internal layout for access and turning requirements of the various pieces of apparatus.*
- **From the response it is assumed that the applicant's traffic consultant, VAI did not review the adequacy for safe pedestrian and bicycle use on Main St in front of their campus, a corridor on which the academy continues to increase its dependence. The need for such a review should be a condition of approval. (11/21/2022)**