

Ref: 9204

March 20, 2023

Ms. Elizabeth Hughes
Town Planner
Town of Concord
141 Keyes Road, 1st Floor
Concord, MA 01742

Re: Response to Engineering Division Follow-Up Comments
Concord Center for Visual Arts – 37 Lexington Road
Concord, Massachusetts

Dear Elizabeth:

Vanasse & Associates, Inc. (VAI) is providing responses to the comments that were raised in the January 16, 2023 memorandum prepared by Mr. Justin Richardson, P.E., Assistant Town Engineer, concerning his review of the December 19, 2022 *Response to Engineering Divion Comments* letter that was prepared by VAI in support of the proposed renovation and expansion of the Concord Center for the Visual Arts (“CCVA”) located at 37 Lexington Road in Concord, Massachusetts (hereafter referred to as the “Project”). Listed below are follow-up Comments 11 through 20 that were identified in the subject memorandum that pertained to the September 2022 TIA followed by our response on behalf of the Project proponent.

Comment 11: *In the Transportation Impact and Parking Demand Assessment there is no discussion of handicap parking spaces for the project. Please address this.*

Response: *The handicapped parking for the Project is accommodated on-site by way of the existing driveway.*

Follow-Up Comment: *How are these spots designated? Is this driveway also intended to be used for loading/unloading? How will this be coordinated?*

Follow-Up Response: The space is designated with a handicapped parking sign and is noted on the Site Plan and also shown on the existing photos that were included with the Application. Additional photos are attached to this letter. The parking space is used for short-term loading/unloading when the space is not in use. When the parking space is occupied, loading/unloading occurs curbside along Lexington Road proximate to the CCVA.

Comment 12: *What will the existing driveway be utilized for?*

Response: *The existing driveway accommodates parking for disabled persons that are taking classes or attending exhibitions, and is also used for deliveries during show installations and events.*

Follow-Up Comment: *See comment number 11.*

Follow-Up Response: See follow-up response to comment 11.

Comment 13: *On Page 5 of the Transportation Impact and Parking Demand Assessment, in Paragraph 3 the number of guests is missing.*

Response: *Visitation for a special event or class at the Concord Art facility varies from approximately 15 persons (weekly night classes) to approximately 75 persons (storytelling, lectures, shows and most weddings/parties), and are schedule to occur during off-peak periods on weekdays, during the evening and on weekends, when traffic volumes are lower and public parking is available within a reasonable walking distance.*

Follow-Up Comment: *Does this number include staff for the events? How is the applicant going to ensure that these events happen during off peak hours?*

Follow-Up Response: The number does include staff for the events. The CCVA is intending to keep the event scheduling that is noted in the Building Usage Chart and is consistent with the current event scheduling. An updated and expanded Building Usage Chart is included in the response to Comment 14.

The Applicant is willing to accept as a condition of approval of the Project that the event schedule and the maximum number of attendees as reflected in the updated Building Usage Chart shall not change without prior approval by the Town. Larger events may be allowed if shuttle buses or similar accommodations are provided that limit the amount of parking required for the event. The Town Planner and the Engineering Division shall be notified in writing in advance of the scheduling of these larger events and the accommodations that will be provided to limit the use of public parking.

Comment 14: *In the Transportation Impact and Parking Demand Assessment it states that special events are scheduled on site “during off-peak periods on weekdays, during the evening and on weekends,...”. Please provide more detail on the days and times of said special events. If the site plan is approved, it is recommended that a condition of approval be implemented that strictly limit large special events to be outside of the peak parking times within the concord center.*

Response: *The table below summarizes the days and times of special events and the number of attendees for the existing facility and after the completion of the Project.*



<i>Event</i>	<i>No. of Attendees</i>	
	<i>Existing</i>	<i>Proposed</i>
<i>Events and Lectures: Once per month on Wednesday or Thursday evening after 5:30 PM</i>	70	75
<i>Juried Show Artist Receptions: Once every 4 months, approximately 3 times per year. . Occurs on Thursdays after 5:30 PM. Note that not all people are in the building at once during the course of the reception.</i>	200	200
<i>Curated Show Artist: Once every 4 months, approximately 3 times per year. Occurs on Thursdays after 5:30 PM</i>	75	75
<i>Night Classes: Weekly on Monday-Friday after 6 PM</i>	12	30
<i>Weddings: Approximately 4-5 times a year and generally on Saturdays after 5 PM</i>	100 passed food 50 seated dinner	100 passed food 50 seated dinner

Follow-Up Comment: *This table indicates that there will be event with 100 and 200 attendees. Where are these attendees going to park?*

Follow-Up Response: The CCVA has informal agreements with the Holy Family Church and the First Parish Church to use the parking at these sites for events. The Holy Family Church parking lot provides parking for 84 vehicles, including four (4) handicapped parking spaces, and the First Parish Church parking lot provides parking for 35 vehicles, including three (3) handicapped parking spaces. When additional parking is needed, the CCVA typically reaches out via phone to coordinate and ask permission to use of the church parking lots. This process has been in place for at least 9 years. The balance of the parking demands for events are met by available public parking. It should be noted that most attendees carpool so the number of vehicles that arrive is less than the number of attendees.

The Building Usage Chart has been updated and expanded to include any changes from the current usage, and is presented below.



Concord Center for the Visual Arts				
Updated Building Usage 2/9/23				
Event	No. of Attendees			Years in Place
	Existing	Proposed	Difference	
Events and Lectures: 6 times per year. Wednesday or Thursday evening after 6 PM-7PM	30-70	30-70	No Change	10+
Juried Show Artist Receptions: 3 times per year. January, February and September. Occurs on Thursdays after 5:30PM-7PM. Note that not all people are in the building at once during the course of the reception.	200	200	No Change	10+
Curated Show Artist: 3 times per year. March, June and October. Occurs on Thursdays after 5:30 PM-7PM	75	75	No Change	10+
Day Classes: Daily 10AM-4PM	8-12 Max	14-20 Max	Additional 8 students per day	28+
Night Classes: 6PM-9PM	8-12 Max 1 day per week	8-12 Max 3 days per week	Additional 24 students per week	28+
Weekend Workshops: Saturday 10AM-4PM and Sunday 12PM-4PM	8-12 Max	8-12 Max	No Change	10+
Artist Demonstrations: Twice a month (on Wednesday) 10:30AM-12:00PM (No Demonstrations during summer months)	10-40 people	10-40 people	No Change	28+
Weddings: Approximately 2-3 times a year during the summer months and generally on Saturday after 5PM-11PM	100 passed food 50 seated dinner	100 passed food 50 seated dinner	No Change	10+
Birthday/Special Events: 2 per year, weekends and evenings	25-50 Max, 2 times a year	25-50, 4 times a year	2 Additional functions per year	10+

As identified in the updated table, program schedules and times are not changing, with a slight increase in the number of attendees participating in daytime nighttime classes (approximately 8 additional participants per day or 24 additional students per week).

As discussed previously, the Applicant is willing to accept a condition as it relates to the updated Building Usage Chart with allowances for larger events with the use shuttle buses or similar accommodations.

Comment 15:

The Concord Art facility has been in operations for a long time. Does it have records on the number of patrons using the facility and where the patrons currently park? It appears that the required 27 spaces for the existing site are being calculated per zoning requirements, but if actual data is available that would be of more value. Additionally, the Transportation Impact and Parking Demand Assessment presumes that all patrons park in public spaces, but have



any arrangements been made with private parking areas in close proximity to the site that could facilitate parking? If not, it is recommended that this be pursued.

Response: *Concord Art does not keep records or track where patrons park. In the past they have made arrangements with local churches for parking when an event is expected to draw a large number of attendees. Wedding planners have requested that their guests park at the town municipal lot. These parking accommodations have worked since weddings generally occur in the evening when the municipal lot has available capacity.*

Follow-Up Comment: *It is recommended that a formal agreement with the close property owners be executed to reduce the burden placed on public parking spaces in the center of Town.*

Follow-Up Response: The CCVA has affirmed their informal agreement with the Holy Family Church and the First Parish Church to use the parking lots at these sites for events.

Comment 16: *The Transportation Impact and Parking Demand Assessment states that the development will create a “deficit of 16 parking spaces” during regular operation, but it does not provide any analysis on the public parking spaces that are currently used. Where are the current primarily used spaces located for the site? Where are the anticipated extra 16 spaces located?*

Response: *The parking demand analysis that is presented in the September 2022 TIA is a zoning based analysis to demonstrate compliance with the Concord Zoning Bylaw. This analysis indicated that 27 parking spaces are required for the existing facility which are met by a combination of on-site parking and off-site parking, including public parking along proximate roadways and within municipal parking lots. With the completion of the Project, 43 parking spaces are required, or 16 additional parking spaces. Consistent with the current parking accommodations for the Concord Art facility, it is expected that this additional parking demand (16 spaces) will be satisfied through the use of existing public parking that is available within walking distance of the site.*

Follow-Up Comment: *The applicant’s response added no additional insight related to where the attendees currently park. Additionally, it is clear that the zoning requirements for parking may address the normal night classes parking volume, but definitely do not address any onsite events that occur.*

Follow-Up Response: The CCVA has informal agreements with the Holy Family Church and the First Parish Church to use the parking at these sites for events. The Holy Family Church parking lot provides parking for 84 vehicles, including four (4) handicapped parking spaces, and the First Parish Church parking lot provides parking for 35 vehicles, including three (3) handicapped parking spaces. When additional parking is needed, the CCVA typically reaches out via phone to coordinate and ask permission to use of the church parking lots. This process has been in place for at least 9 years. As indicated in the updated Building Usage Chart, no changes to program schedules or significant changes in the number of attendees is expected over current conditions.



As discussed previously, the Applicant is willing to accept a condition as it relates to the updated Building Usage Chart with allowances for larger events with the use shuttle buses or similar accommodations.

Comment 17: *CPW regularly receives complaints about traffic, parking, pedestrian access and safety, and bicycle access and safety in concord center. Further parking zoning relief seems excessive and will only exacerbate a current and ongoing issue in concord center. How common is this for developments similar to Concord Center for Visual Arts to receive additional parking zoning relief?*

Response: *We defer to the Planning Division, but note that VAI has worked on several projects in Concord Center that have demonstrated compliance with the parking requirements of the Zoning Bylaw by demonstrating that there is sufficient public parking located within a reasonable walking distance to meet the parking requirements of the Zoning Bylaw. It is not uncommon in a town center or central business district that parking requirements, when specified, are satisfied through the use of off-site public or commercial parking.*

Follow-Up Comment: *The available public parking has not grown but the “several projects” mentioned have expanded their uses and demand on the public parking. Can VAI demonstrate the cumulative effect on the public parking resulting from these several projects?*

Follow-Up Response: We are not aware of the use expansions that were noted; however, the prior parking demand studies (2019) identified in excess of 200 parking spaces were available between 7:00 AM and 7:00 PM, which would be more than sufficient to accommodate the parking associated with modest expansions of the approved uses. As noted, the parking demand study is dated, and there is a need to update the study to be reflective of the current parking supply and parking demands in Concord Center that post-COVID 19 and with the changes in use and expansions that have occurred since the original study was completed.

As it relates to the Project, the updated Building Usage Chart documents that there will be no change to program schedules and there will be no significant change in the number of attendees over current conditions that would materially impact the availability of public parking. As discussed previously, the Applicant is willing to accept a condition as it relates to the updated Building Usage Chart with allowances for larger events with the use shuttle buses or similar accommodations.

Comment 18: *Was the “Parking Inventory and Regulations (5 Minute Walking Distance)” figure prepared from a field examination of the area? What criteria was used to determine where public spaces are available and were parking limitations explored? For example, parking on both side of Heywood Street is not recommended due to the narrowness of the roadway, heavy traffic, and is a primary response route for emergency vehicles. Were the Town of Concord, Massachusetts Traffic, Parking and Pedestrian Rules & Regulations reviewed prior to the preparation of said figure?*



Response: *Figure 2, Parking Inventory and Regulations (5 Minute Walking Distance), reflects a filed inventory of existing parking conditions as observed in April 2019 and updated to include Lexington Road and Heywood Street in July 2022. We do not disagree with the comment pertaining to parking along both sides of Heywood Street and would suggest that the Town consider a regulation prohibiting parking along one or both sides of the roadway. It appears that parking along one side of the roadway could be accommodated if so desired.*

Follow-Up Comment: *The response only partially addresses the questions. Some of the parking areas on the figure may go against the Town of Concord, Massachusetts Traffic, Parking and Pedestrian Rules & Regulations.*

Follow-Up Response: *The intent of Figure 2 is to document areas where parking is not expressly prohibited by way of regulatory signs, and does not imply that sufficient roadway width is available to formalize parking along one or both sides of a roadway. In particular, Heywood Street and Walden Street east of Heywood Street do not provide sufficient width (paved area) to accommodate on-street parking and two-way travel.*

Comment 19: *Because of the concern that on-street parking may not be adequate for the proposed changes, a post construction review of the traffic and parking after 6 months of issuing occupancy should be performed and reported to the Town.*

Response: *The Project is expected to result in a minor increase in the number of parking spaces that are required pursuant to the Zoning Bylaw (16 parking spaces). Given that there are 582 public parking spaces located within a 5-minute walking distance of the Project site and that over 240 of these spaces have previously been identified as being available between 7:00 AM and 7:00 PM on both a weekday and a Saturday, more than sufficient parking should be available to off-set the number of additional parking spaces that are required to support the Project. Further and as identified herein, the majority of the events that would require the additional parking occur during off-peak periods on weekdays, during the evening and on weekends, when traffic volumes are and parking demands in the area are lower.*

Follow-Up Comment: *Comment still applies. The applicant has included information what would indicate that the zoning requirement for parking may not be adequate for large events. Additionally, if these events are scheduled during large events at the Library, Concord Academy, or other Town Events a major parking issue in the Town Center could occur.*

Follow-Up Response: *As documented in the updated Building Usage Chart, no changes are proposed to program schedules and there will be no significant change in the number of attendees over current conditions that would materially impact the availability of public parking. The CCVA has been and will continue to use the parking lots at the Holy Family Church and at the First Parish Church for events.*

As discussed previously, the Applicant is willing to accept a condition as it relates to the updated Building Usage Chart with allowances for larger events with the use shuttle buses or similar accommodations. In addition, the Applicant will



coordinate the scheduling of large events (defined as 100 or more attendees, including staff) with the Town, Concord Academy and the Concord Free Library to avoid overlapping events. Further, the Applicant will also accept a condition requiring a post construction review of the traffic and parking after 6 months of issuing occupancy. This review will include the following information:

- Summary of events and the number of attendees for the 6-month period after the issuance of a new Certificate of Occupancy;
- Survey of transportation modes used by attendees, including information on carpooling; and
- Survey of parking availability (ease of locating) and location where attendees parked.

The results of the post construction review shall be summarized in a report that will be provided to the Town Planner and the Engineering Division.

Comment 20:

The introduction paragraph of the Transportation Impact and Parking Demand Assessment states “(iv) evaluates safety considerations with respect to motor vehicle crash data, pedestrian and bicycle accommodations and sight lines.” VAI reviewed MassDOT’s high crash location database and made mention of existing sidewalks and lack of bike lanes. Have they reviewed the existing conditions of the street proximate to the site to identify any safety issues with sight lines, sidewalks, pedestrian crossings and bicycle use? Accident data from CPD should also be evaluated within close proximity to the site. Will any of the patrons be walking or biking to events and therefore not require parking spaces?

VAI Response:

Sight lines along Lexington Road approaching the driveway that serves the Project site are unimpeded. Lines of sight for motorists exiting the driveway are limited by on-street parking along the north (Project) side of Lexington Road; however, we note the following: i) the driveway has limited activity; and ii) motorists exiting the driveway have clear sight lines to pedestrians walking along the sidewalk and then are able to position their vehicle across the sidewalk and then use the parking lane as a buffer to observe approaching traffic before exiting.

The sidewalk along Lexington Road follows the existing topography and conditions and width vary along its alignment, with driveway crossings flush such that the sidewalk crosses the driveways. The closest marked crosswalks for crossing are provided to the west of the Project site at Monument Square. The crossings are not compliant with the Americans with Disabilities Act (ADA), noting that wheelchair ramps are not consistently provided and those that are provided are deficient as to material type (cement concrete is required), do not include a tactile warning panel or serve multiple crossings.

Bicycle accommodations are not provided along Lexington Road and the roadway does not provide sufficient width on a continuous basis to support both bicycle travel and on-street parking.

Walking and bicycling will be encouraged by staff and event attendees when practical given the nature of events and attendee attire (dress). The Project



proponent is supportive of pedestrian improvements that can be undertaken in the area, including exploring opportunities for a pedestrian crossing of Lexington Road in the vicinity of the Project site.

Follow-Up Comment: *The response only partially addresses the question, and does not include any accident information in close proximity to the site. Additionally, the response does not include information on attendees walking and/or biking to events.*

Follow-Up Response: Most attendees drive to programs and events, and use available public parking and the parking lots at the Holy Family Church and at the First Parish Church for events. Sidewalks and marked crosswalks are provided to safely convey pedestrians to the CCVA. As stated previously, the CCVA is interested in exploring opportunities for a pedestrian crossing of Lexington Road in the vicinity of the Project site.

A review of the crash data from MassDOT for the most recent three-year review period (2018 through 2020 for the segment of Lexington Road between Main Street and Heywood Street indicates that there were a total of four (4) crashes during this period, none of which involved a pedestrian or bicyclists and all appeared to involve a motorist exiting an on-street parking space, either a sideswipe or rear-end type crash along the roadway that resulted in property damage only. This data was confirmed by the Concord Police Department, who reported a similar number of crashes along this section of the Lexington Road corridor between January 2020 and December 2022.

We trust that this information is responsive to the follow-up comments pertaining to the September 2022 TIA that were raised in the January 16, 2023 memorandum prepared by Mr. Richardson. If you should have any questions or would like to discuss our responses in more detail, please feel free to contact me.

Sincerely,

VANASSE & ASSOCIATES, INC.



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

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

JSD/jsd

Attachments

