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VIA E-MAIL

February 10, 2022

Jane Fisher Carlson, Chair
Weston Zoning Board of Appeals
Weston Town Hall
11 Town House Road
P.O. Box 378
Weston, MA 02493
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**Re: 510, 518 and 540 South Avenue / Hanover-Weston 40B Proposal
Unresolved Traffic Issues**

Dear Ms. Carlson and Members of the Board:

This firm represents a group of Weston residents and abutters with respect to the proposed 40B residential housing development (the “Project”) at 510, 518 and 540 South Avenue in Weston (the “Property”) for which the Weston Zoning Board of Appeals (the “Board”) is currently conducting a hearing on the application filed by 518 South Ave, LLC (the “Applicant”).

As the Board prepares to continue its discussion of traffic, transportation and site access issues associated with the Project, we write to call your attention to critical outstanding issues previously discussed, but not yet addressed by and/or requiring additional information from the Applicant.¹ Each of the issues outlined below relates directly to the proposed Project’s impacts on public safety, and thus warrant the Board’s careful consideration.

Traffic Design and Public Safety

1. Sight distance calculations should be based on a 45mph design speed in both directions, *which is consistent with methodology originally employed by the Applicant’s own traffic consultant, Vanasse & Associates, Inc. (“VAI”), in its May 13, 2021 Traffic Impact and Analysis Study (“TIAS”).* Indeed, the 45mph design speed was adopted by the designers for the proposed Route 30 reconstruction project. This more conservative measure is appropriate given the variable data,

¹ These issues have been raised previously in written submittals and presentations from Greg E. Lucas, P.E., PTOE, RSP of Environmental Partners (“EP”), John T. Gillon, P.E. of Gillon Associates (“JG”), and the Board’s peer-review consultant on civil engineering, Professional Services Corporation, PC (“PSC”).

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and in light of the complexity of the intersections and curvature of South Avenue in the vicinity of the Property and proposed site driveway.² It does not make sense for the Applicant to switch its position during the course of the hearing process to adopt a different, less protective design speed for this Project in order to suit its preferred outcome.

2. A tabular summary should be provided identifying calculated Stopping Sight Distance (“SSD”) and Intersection Sight Distance (“ISD”) in both directions from the main site driveway at 540 South Avenue and the emergency access drive at 518 South Avenue.³ Site and roadway plans should be provided showing sightlines for SSD and sight triangles for ISD in both directions at both driveways.⁴

As noted by EP, “meeting SSD is paramount to safety” yet the “data and materials provided to the Board to date do not establish that SSD has been met for the project.”⁵ Rather, the record presently reflects deficiencies – in both SSD and ISD – for the main site drive and the emergency access drive, as illustrated by actual sight distance measured by a physical site inspection. To date, the Applicant has not provided the distances from each access drive or otherwise addressed these deficiencies. Furthermore, the Applicant has not corrected inconsistencies in both directions and the interchangeable use of SSD and ISD in its plans, which reveal that the Project does not meet the recommended ISD values at either driveway; the Applicant provides the “minimum” ISD of 320 feet, far short of the recommended ISD values of 500 feet west and 430 feet east.⁶

3. The offsetting intersections of the Project’s proposed main site drive and Highland Street with South Avenue – which are only 180 feet apart – create significant safety and operational concerns. The Applicant should provide a qualitative analysis of these offsetting intersections, including a focus on operational issues with opposing left-hand turns, which is necessary to better understand the safety impact of having these two intersections in such close proximity.⁷
4. The horizontal curvature of South Avenue at the Property, and the frequent access points along this curve, call for a corridor crash analysis to accurately define the cumulative effect of the existing features on roadway safety in the vicinity of the Project.⁸
5. The Applicant needs to provide an analysis of how existing queuing on South Avenue eastbound during the morning peak hour will impact, and be impacted by, traffic exiting or entering the Project’s main site drive.⁹
6. Left turns from South Avenue westbound into the main site driveway will result in queuing, especially during evening peak hours. The Applicant should provide analysis showing the extent

² EP Updated Findings, December 9, 2021, pp. 2-3.

³ EP Updated Findings, December 9, 2021, pp. 3-4.

⁴ EP Updated Findings, December 9, 2021, pp. 3-5.

⁵ EP Updated Findings, December 9, 2021, p. 4.

⁶ EP Updated Findings, December 9, 2021, p. 4; GA June 29, 2021 letter, p. 6.

⁷ EP Updated Findings, December 9, 2021, pp. 5, 8.

⁸ EP Updated Findings, December 9, 2021, p. 8.

⁹ EP Updated Findings, December 9, 2021, p. 8.



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of the queuing and whether a single lane is adequate to accommodate vehicles turning into the site driveway during the evening peak hour, as well as the impact of queuing of eastbound traffic during morning peak hours, when traffic routinely backs up beyond the main site drive.¹⁰

7. The Project's impact on the Wellesley Street-South Avenue intersection – which currently operates at “Level Of Service F”, meaning the worst and most congested conditions – requires more analysis. As the “LOS F” designation reveals, this intersection is well over capacity under existing conditions, and is not equipped to handle the Project's additional traffic volume load. The Applicant needs to provide more detail regarding the Project's impact on traffic at this intersection and proposed mitigation.¹¹
8. We are evaluating the Applicant's claim, set forth in a letter dated May 3, 2022, that the Board has authority to approve grading and drainage work within South Avenue, but note that there are outstanding technical issues associated with the work proposed to improve site lines, including: whether the proposed cut of approximately 6 feet would encounter rock ledge; disposition of the vent pipe; the origin and exact location of the gas line shown under the proposed sidewalk; and whether existing utility poles will remain.

Emergency Access

9. The Project's scale requires that the emergency access at 518 South Avenue be designed in way that compromises safety in order to avoid unacceptable environmental impacts. The revised emergency access driveway is designed with a 5-foot-wide drainage swale and rain garden running between two paved, 7.5ft-wide tracks. PSC and others have made clear that this design is problematic for a number of reasons, including the likelihood that an emergency vehicle could slide into the bioswale and become disabled.¹² In addition, we question whether this design meets the Massachusetts Comprehensive Fire Safety Code, 527 CMR 18.2.3.4.1.1.¹³
10. The Applicant's own submittals show the Weston Fire Department's ladder truck would encroach on westbound traffic on South Avenue when entering the emergency driveway from the west or when exiting to the east.¹⁴ This is contrary to the Massachusetts Comprehensive Fire Safety Code, 527 CMR 18.2.3.4.8, which provides that “[t]he use of the opposite travel lane is prohibited in the design of all new fire apparatus access roads.”
11. A driveway profile should be provided for the emergency access drive and roadway to account for sections with steep grades. This plan should be provided to the Board, as well as the Weston Fire Chief for review and comment.¹⁵ We ask that the Board consider inviting the Weston Fire Chief to attend a hearing to discuss the emergency access plan for the Project.

¹⁰ EP Updated Findings, December 9, 2021, p. 8.

¹¹ EP Updated Findings, December 9, 2021, p. 9.

¹² PSC January 12, 2022 Memorandum, pp. 8-9, #13.

¹³ 527 CMR 18.2.3.4.1.1 provides that fire department access roads shall have an unobstructed width of not less than 20 feet or, if constructed in the “boulevard-style”, not less than ten feet when they do not provide access to a building or structure.

¹⁴ EP Updated Findings, December 9, 2021, p. 8.

¹⁵ EP Updated Findings, December 9, 2021, p. 9.



Parking and Other On-Site Concerns

12. A parking analysis should be provided to verify that the reduction of 60 parking spaces is appropriate for a reduction of 20 units.¹⁶ Broad averages on parking ratios for multifamily dwellings must take into consideration the lack of transportation, retail, and public amenities located within walking distance of this Property. This Project is heavily car-dependent, and it does not offer any overflow parking options.
13. The Applicant has been requested to provide a detailed parking management plan governing aspects of the Project which include: the number of vehicles the residents can park on-site; visitor parking; service vehicle parking; and how electric vehicle charging stalls will be allocated and managed.¹⁷ To date, no such plan has been provided.
14. An Operation and Maintenance Plan, including a snow storage plan and supporting materials, has been requested to illustrate: where snow storage should occur during winter storms; calculate the amount of snow accumulation that will be collected from paved areas during a typical snowstorm event; and detail the storage volume that will be provided by the recommended snow storage zones at each specific area (to justify that the areas selected for snow storage are adequate).¹⁸ To date, no such plan has been provided.
15. The Weston School Committee, in a letter dated September 23, 2021, asks that the Board require that the “Applicant will not prohibit the entry of school buses for the purpose of loading or unloading passengers from the property”, but will “provide a dedicated off-street paved surface ... intended for the safe loading and unloading of passengers from a full-sized school bus.” Meanwhile, PSC advises that the Board should “[c]onfirm that school buses will not enter the site” and “[p]rovide a pullout lane at the main entrance to accommodate parents waiting for school bus pickup or drop-off.”¹⁹ It seems that these statements are contradictory, and must be reconciled.

Thank you for your continued consideration of, and attention to, these important issues. Please do not hesitate to contact me should you have any questions.

Very truly yours,



Luke H. Legere

cc: James Ward, Esq.
Jonathan D. Witten, Esq.
Daniel C. Hill, Esq.
Dennis A. Murphy, Esq.

¹⁶ EP Updated Findings, December 9, 2021, p. 9.

¹⁷ EP Updated Findings, December 9, 2021, p. 9; PSC January 12, 2022 Memorandum, p. 32, #73.

¹⁸ PSC January 12, 2022 Memorandum, p. 18, #33 and p. 30, #65.

¹⁹ PSC January 12, 2022 Memorandum, and p. 30, #64(e).

