

September 10, 2025

Ms. Alison Manugian, Community Development Director
Dracut Planning Board
62 Arlington Street
Dracut, MA 01826

Subject: Transportation Peer Review Services
Beaver Brook Mill Redevelopment
88, 91, 101 Mill Street, Dracut, MA

Dear Board Members:

MDM Transportation Consultants, Inc. (MDM) is pleased to provide you with the following supplemental transportation review comments for the above-referenced project. These comments have been prepared based on a review of the documents identified below.

MDM prepared and submitted a Transportation Peer Review Letter issued on August 20, 2025 (the "August 2025 Review Letter") that included commentary on the Traffic Impact and Access Study (TIAS) and Site Plans prepared in support of the proposed redevelopment project. Subsequent supplemental evaluation referenced below focuses on the shared parking supply for the Site.

Supplemental Documents Reviewed

MDM has reviewed the following documents as provided by the Applicant's Parking Consultants in addition to the documents cited and reviewed in the August 2025 Review Letter:

- *Technical Memorandum, Shared Parking Analysis (Revised), Beaver Brook Mill Development*, prepared by Desman Design Management dated July 16, 2025.

Proposed Development and Context

As described in the August 2025 Review Letter, the proposed site development consists of the redevelopment of the existing Beaver Brook Mill mixed-use development. Presently the Beaver Brook Mill contains a 47-unit multifamily residential community and 74,500 square feet (sf) of commercial space supported by 359 parking spaces. The proposed redevelopment consists of the expansion of the multifamily residential community by 126-units, a reduction of 13,000 sf of commercial space, and construction of 102 additional parking spaces. Once completed, the

renovated and expanded Beaver Brook Mill mixed-use development will consist of a 173-unit multifamily residential community and 61,500 sf of commercial space supported by a total of 461 parking spaces.

Shared Parking Analysis Summary and Comments

MDM finds that the Shared Parking Analysis has been prepared in general conformance with industry standards and reasonably quantifies existing/baseline parking levels, projected hourly parking demands at the Site based on a calibrated shared parking model. The assessment provides a basis to justify that the proposed parking supply will reasonably accommodate peak parking demands once the project is built and fully occupied.

The Shared Parking Analysis accurately describes the current Town of Dracut parking regulations and presents a comparison of required under zoning to the observed parking demands for the component site uses. Observed parking demands fall substantially below Town parking requirements for existing site uses which are calculated at approximately 427 spaces. The parking assessment presents a summary of Friday and average Saturday parking observations which were observed in May 2025. These observations consistently show a parking utilization of between 52 percent (Friday) and 45 percent (Saturday) during the observation periods – representing a peak demand of 189 spaces (Friday) and 162 spaces (Saturday).

A shared parking model was developed for two analysis conditions: a “baseline” condition and a proposed condition with residential uses in place. Both parking analysis conditions calculate peak parking demands using Town zoning parking rates and time-of-day demand characteristics for component uses of the site with calibration of peak demand that reflects May 2025 parking observations. Using this methodology, the baseline conditions predict a parking surplus of up to 73 spaces on weekdays and 95 spaces on weekends. The proposed conditions are projected to have a surplus ranging from 81 to 115 parking spaces on weekdays and 120 to 157 spaces on weekends. In summary, the Shared Parking Analysis concludes that the proposed parking supply will be sufficient to meet the peak parking demands of the redeveloped Beaver Brook Mill under a shared parking arrangement.

Comment: MDM concurs with the overall findings of the Shared Parking Analysis and offers the following summary comments, none of which require formal response by the applicant:

- Parking observations presented in the Shared Parking Analysis reflect similar levels of parking activity to those observed by MDM in August of 2025 and provides a reasonable and appropriate basis for the calibration of the parking demand model presented in the evaluation.

- MDM concurs that the proposed parking supply of 461 spaces represents a reasonable supply to support the redevelopment of Beaver Brook Mill under a shared parking arrangement.
- MDM further notes that parking supply in garages and below the primary residential building total 182 spaces, which when combined with surface spaces immediately proximate to residential buildings (approximately 76 spaces) yields an effective per-unit supply ratio of 1.5 spaces. This comports with anticipated peak residential parking demands documented by the Institute of Transportation Engineers (ITE) in Parking Generation, 5th Edition. Higher effective parking supply to support residential use would occur during overnight periods when commercial uses are not in operation.
- The balance of surface parking (184 space) is expected to reasonably accommodate the balance of commercial uses at the site that are proximate to those uses and is consistent with observed parking demand conditions at the site for current uses.

MDM appreciates the opportunity to provide Transportation Planning & Engineering Services to the Town of Dracut and look forward to discussing our findings at an upcoming Planning Board hearing. If you have any ~~questions or~~ concerns, please feel free to contact this office.

Sincerely,



Robert J. Michaud, P.E.
Managing Principal

MDM