



**WALL STREET DEVELOPMENT CORP.**  
REAL ESTATE DEVELOPERS

**VIA EMAIL AND REGULAR MAIL**

December 11, 2025

Mr. William Millier, Chief  
Bellingham Fire Department  
30 Blackstone Street  
Bellingham, MA 02019

RE: Blackstone Street – Improvement Plan  
Massachusetts Comprehensive Fire Safety Code - 527 CMR 1.00 (the “Code”)  
Chapter 18 - Fire Department Access and Water Supply

Dear Chief:

Thank you for your recent email regarding the Fire Department’s comments included in a memorandum from the Bellingham Planning Board dated November 4, 2025 (the “November 4<sup>th</sup> Memo”) regarding the proposed improvement of the private portion of Blackstone Street. As you know, Blackstone Street starts at the intersection with South Main Street (Route 140) and runs southwesterly to the Blackstone town line, where it continues as "Bellingham Road" in Blackstone. The portion of Blackstone Street from South Main Street (Route 140) to its intersection with Maddie Way is an improved public way, while the remaining portion of Blackstone Street from Maddie Way to the Blackstone town line (as shown on the Site Plan) currently exists as a variable width gravel road.

Historical records of the Town of Bellingham (the "Town") indicate that the entire length of Blackstone Street to the Blackstone town line was laid out by the Selectmen as a public way on February 22, 1768. Up until 2001, Blackstone Street, including the unpaved, gravel portion of Blackstone Street was classified as a public way in the Town. In 2001, Town Meeting voted to abandon that portion of Blackstone Street between the westerly side of Allen's Way (now Maddie Way) and the Bellingham-Blackstone town line. The Town's vote to abandon this portion of Blackstone Street removed the Town from the responsibility to repair and/or maintain the portion of Blackstone Street, west of Allen's Way (known now as Maddie Way).

The Town Meeting vote to abandon this portion of Blackstone Street resulted in the roadway reverting back to "private way" status, with the fee in the right of way continuing to be subject to the rights of others that may be entitled to use the private way portion of Blackstone Street (the "Private Way"). The Private Way is an existing variable width (between 27 ft and 40 ft) right of way that consists of a gravel-packed road with a gradual hilled terrain. The gravel road serves as primary access to the Property which had been previously used as a gravel mining operation. Wall Street proposes to construct and improve the Private Way to be consistent with the Town's subdivision construction standards.

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The November 4<sup>th</sup> Memo included several comments provided by the Bellingham Fire Department (“BFD”) regarding the proposed improvements to be constructed to the Private Way. Wall Street proposes to complete and improve the Private Way to provide access for 8-10 lots that have frontage along the Private Way. The proposed improvements include grading, widening and paving the existing gravel road within the existing right of way, along with the installation of utilities and stormwater features to treat and manage stormwater (the “Blackstone Street Project”).

The BFD has offered comments regarding the Project and the applicability of the Massachusetts Comprehensive Fire Safety Code - 527 CMR 1.00, specifically Chapter 18 - Fire Department Access and Water Supply (the “Code”), Outlined below are the comments of the BFD:

1. Road Widths - The plans show no specific widths but rather variables. The code states a minimum of 20' wide roads excluding the shoulders.

Applicable Regulation: 18.2.3.4.1.1, 18.1.1.4, and 18.1.1.6

Section 18.2.3.4.1.1 states:

2. Road Grades - The plan shows a maximum grade of 10% in one area which causes great concern for access of emergency vehicles.

Applicable Regulation: 18.2.3.4.6.2, 18.2.3.4.6.3, 18.2.4.1.2, and 18.2.3.5.6.1

3. One Way In - The permitted cul-de-sac must accommodate the turning radius of our Ladder Truck.

Applicable Regulation: 18.2.3.5.3 including 18.2.3.5.3.1, 18.2.3.5.3.2, 18.2.3.5.3.3, 18.2.3.5.4

Section 18.2.3.5.3 applies to Turning Radius.

Section 18.2.3.5.1 states: The minimum inside turning radius of a fire department access road shall be 25 feet. The AHJ shall have the ability to increase the minimum inside turning radius to accommodate the AHJ's apparatus.

Section 18.2.3.5.3.2 states: Turns in fire apparatus access roads shall maintain the minimum road width.

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Section 18.2.3.5.3.3 states: Fire apparatus access roads connecting to roadways shall be provided with curb cuts extending at least 2 ft(0.61 m) beyond each edge of the fire apparatus access road.

Section 18.2.3.5.4 states: Dead-end fire apparatus access roads in excess of 150 ft (46 m) in length shall be provided with approved provisions for the fire apparatus to turn around.

4. Maximum of 30 Dwellings - Code states that if more than 30 residential dwellings, multiple fire apparatus access roads may be required.

Applicable Regulation: 18.2.3.3\*

Section 18.2.3.3\* states: More than one fire apparatus access road shall be provided when it is determined by the AHJ that access by a single road could be impaired by vehicle congestion, condition of terrain, climate conditions, or other factors that could limit access.

5. Hydrant Locations - If a fire hydrant is located on an access road, the minimum required road width increases to 26 feet in the immediate vicinity.

Applicable Regulation: Appendix D

Wall Street has reviewed the provisions of the Code, specifically Chapter 18, and the applicability of the Code to the Blackstone Street Project. Based on Wall Street's review of the Code, it seems that the BFD has not properly interpreted the provisions of the Code for the following reasons:

The Code at 527 CMR 1.18.1 - General Scope states:

“Fire Department access and water supplies shall comply with this chapter. The provisions of this Chapter shall not apply to any city, or town which has accepted the provisions of M.G.L. c. 41, sec. 81 et. seq. [Emphasis Added] Chapter 18, or similar laws which provide local jurisdiction over fire department access and water supply. In the absence of any such laws, fire department access and water supply shall comply with this chapter.”



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Since Bellingham has accepted the provisions M.G.L. c. 42, sec 81 (otherwise known as the Subdivision Control Law) it would be Wall Street's view that the provisions of the Code, specifically Chapter 18, would not be applicable to the Blackstone Steet Project.

In addition, the Code at 527 CMR 18.1.1.3.1 provides the following:

Existing and new one and two-family detached dwellings, not located behind a building with adequate frontage, and their accessory structures such as garages, carports, and sheds shall be exempt from the provisions of 18.2.3."

Since the Blackstone Street Project will provide access to 8 – 10 single-family homes fronting along the Private Way, the Code 527 CMR 18.1.1.3.1 would not be applicable. Under these circumstances BFD lacks jurisdiction over the Blackstone Street Project.

In addition, the Code at 18.1.1.6 states:

Nothing in this Section shall reduce the requirements established by cities or towns under M.G.L. c. 40A and planning and zoning bylaws.

Notwithstanding the Code's limited applicability, Wall Street shares the concerns of the BFD to provide safe and adequate access to the proposed homes along the Private Way and offers the following information regarding BFD comments.

A. From the comments of the BFD it would seem that the BFD has misinterpreted the words "access road". The Private Way is not an access road within the context of the Code. The Private Way is a way that was in existence prior to the adoption of the Subdivision Control Law in the Town. Therefore, tThe Private Way is a street, not an access road.

B. Section 18.2.3.4.1.1 states: Fire department access roads shall have an unobstructed width of not less than 20 feet. Fire department access roads constructed in the boulevard style shall be allowed where each lane is less than 20 feet but not less than ten feet when they do not provide access to a building or structure.

**Response:** While the Private Way is not an access road under the Code, it will have a paved travel way of twenty-two (22) feet with a one (1) foot shoulder on either side of the travel way (See Sheet No. C-10 for roadway cross-section).

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C. Section 18.1.1.4 states “The fire apparatus access road plans must include an analysis and evaluation of fire apparatus maneuvers throughout the access roads created by swept path analysis and turn simulation software.”

**Response:** Notwithstanding the fact that the Private Way is not an access road, a swept path analysis will be provided to demonstrate that fire apparatus can maneuver throughout the Private Way.

D. Section 18.1.1.6 states: Nothing in this Section shall reduce the requirements established by cities or towns under M.G.L. c. 40A and planning and zoning bylaws.

**Response:** No Response Required.

E. Section 18.2.3.5.6.1 states: The gradient for a fire department access road shall not exceed 10%, unless approved in writing by the AHJ.

**Response:** Notwithstanding the fact that the Private Way is not an access road, the grades of the Private Way will not exceed 10%. Sections 18.2.3.4.6.2, 18.2.3.4.6.3, and 18.2.4.1.2 are not able to be found and therefore, no response is provided at this time.

F. Section 18.2.3.5.3 applies to Turning Radius.

**Response:** Notwithstanding the fact that the Private Way is not an access road the proper turning radius will be provided as close to reasonably possible.

G. Section 18.2.3.5.1 states: The minimum inside turning radius of a fire department access road shall be 25 feet. The AHJ shall have the ability to increase the minimum inside turning radius to accommodate the AHJ’s apparatus.

**Response:** Not response is required. Blackstone Street is not a fire access road.

H. Section 18.2.3.5.3.2 states: Turns in fire apparatus access roads shall maintain the minimum road width.

**Response:** Notwithstanding the fact that the Private Way is not an access road the proposed 22 foot width of the Private Way will be maintained throughout.



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I. Section 18.2.3.5.3.3 states: Fire apparatus access roads connecting to roadways shall be provided with curb cuts extending at least 2 ft(0.61 m) beyond each edge of the fire apparatus access road.

**Response:** Notwithstanding the fact that the Private Way is not an access road, proper curb cuts will be provided where possible.

J. Section 18.2.3.5.4 states: Dead-end fire apparatus access roads in excess of 150 ft (46 m) in length shall be provided with approved provisions for the fire apparatus to turn around.

**Response:** Notwithstanding the fact that the Private Way is not an access road, a turnaround for the fire apparatus to turn around will be provided.

K. Section 18.2.3.5.3.1 states: The minimum inside turning radius of a fire Department access road shall be 25 feet. The AHJ shall have the ability to increase the minimum inside turning radius to accommodate the AHJ's apparatus.

**Response:** The Private Way is a street, not an access road. This section is not applicable.

L. Section 18.2.3.3\* states: More than one fire apparatus access road shall be provided when it is determined by the AHJ that access by a single road could be impaired by vehicle congestion, condition of terrain, climate conditions, or other factors that could limit access.

**Response:** BFD implies that the Blackstone Street Project may provide access to more than "30 residential dwellings" in which case multiple fire apparatus access roads may be required. As previously noted, the Blackstone Street Project will provide access for 8-10 building lots with frontage along the Private Way. The proposed improvements to the Private Way will have a satisfactory turnaround at the Bellingham/Blackstone town line. If required, Blackstone Street can be connected to Bellingham Road in Blackstone.

M. Hydrant Locations - If a fire hydrant is located on an access road, the minimum required road width increases to 26 feet in the immediate vicinity - Appendix D.

**Response:** Notwithstanding the fact that the Private Way is not an access road, it should be noted that Appendix D is not a regulation.





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Thank you for your consideration and attention in this matter. Should you have any questions, please feel free to contact me at 617-922-8700.

Sincerely,

**WALL STREET DEVELOPMENT CORP.**

*Louis Petrozzi*  
Louis Petrozzi, President

cc. Rob Lussier – Bellingham Planning Board  
Michael Dryden – Allen Engineering & Associates  
Scott Goddard – Goddard Consulting LLC  
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