

**Stantec**

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RECEIVED
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September 21, 2012

Ms. Candace Havens
Planning Director
City of Newton
1000 Commonwealth Avenue
Newton, MA 02549

**Re: The Station at Riverside
Newton, MA**

Dear Candace:

On behalf of Equity Office thank you for inviting us to attend the presentation on August 8, 2012 by Fay, Spofford & Thorndike (FS&T) regarding their review of the traffic study prepared by VHB for the above referenced project. We greatly appreciate having the opportunity to interact directly with you and FS&T regarding the anticipated traffic impacts of this significant development proposal. Having reviewed our observations from the meeting with our client, we have been asked to submit this letter documenting Equity's continued traffic concerns. These are presented below.

Route 128 Access

As you know, Equity's primary concern from a traffic perspective is that access between Route 128 and their asset on Grove Street, the Riverside Center office building, not be degraded as a consequence of the Station project. More specifically, traffic operations along Grove Street at the Route 128 Northbound Ramps, Southbound Ramps and MBTA Station Driveway intersections with the Station project built must be maintained at existing levels or improved. However, based on the FS&T findings, expected future traffic operations at these locations are still not known. More importantly, the future traffic operations will be highly dependent upon the access plan approved for the Station project.

FS&T has commented on the three alternative site access plans offered by VHB for the Station project. Comparing the three access plans based on the information presented in the most recent VHB study, Equity Office believes the only viable alternative is Option B-2 as it is the only option with the potential to result in no degradation in through traffic and no material traffic volume increases on Grove Street north of Route 128 and in particular at the MBTA Driveway/Grove Street intersection. Option B-2 allows traffic from the development project and MBTA Station traffic to enter and exit the site from the proposed Route 128 Northbound Collector-Distributor (C-D) Road. Under Option B-2, left-turns would be allowed from the site onto the C-D Road thereby reducing the volume of traffic that might otherwise turn right from the MBTA Driveway and congest Grove Street. Option A is similar to Option B-2 except that left turns would not be allowed from the site onto the proposed C-D Road thereby requiring this traffic to use Grove Street and the MBTA Driveway. Option F requires all Station traffic to use Grove Street and the MBTA Driveway. Based on the information presented to date, Equity has concluded that Options A and F are unacceptable.

Option B-2

FS&T has raised concerns that Option B-2 may not be viable due to sight line constraints along the C-D Road that would create an unsafe condition for traffic turning left from the development and transit station site. FS&T recommended that this sight line constraint be further studied by the applicant and/or by the City. A solution to eliminate this sight line constraint must be developed in order to make Option B-2 viable. Equity asks that the City require the applicant to mitigate any conditions which are inconsistent with a viable Option B-2. Note that other variations of Option B-2 have been considered previously that include traffic signal control and grade separation to safely accommodate the left-turn movement.

MBTA Driveway

Without left-turns permitted from the Station site to the proposed C-D Road, Options A and B-2 are identical. For both options, FS&T recommends that the MBTA Driveway approach to Grove Street be constructed as two lanes rather than one as proposed by VHB. FS&T recommends this change to minimize vehicle queuing on the project site. Equity sees this change as an opportunity to minimize the amount of green time allocated to the MBTA Driveway at the proposed traffic signal and maximize the green time available to through traffic on Grove Street, traffic that may be traveling to or from Riverside Center. Should the development project move forward and plans are developed to signalize this intersection, Equity requests the opportunity to review and comment on the proposed signal timing plans before the signal timing is approved as part of any project mitigation. Further, Equity requests that as a condition of any special permit granted for the development project, there be a requirement that the Owner of 275 Grove Street be given the prior opportunity to review and comment on any signal timing plans for traffic signalization at this intersection to insure that there are no adverse impacts on traffic coming to or from its site. Any such review and comment could be made in consultation with the city traffic engineer and planning department. Equity would seek to minimize delays to through traffic on Grove Street resulting from the development project and the signal timing of this proposed signal.

Traffic Assignments

FS&T seems comfortable with the manner in which VHB assigned traffic to the two proposed site access points. VHB essentially assigned all traffic originating from Route 128 and associated with new uses on the site (office, residential and retail) to the proposed C-D Road. VHB also reassigned more than half of the MBTA related traffic from the MBTA Driveway to the proposed C-D Road. We continue to question the reassignment of existing MBTA Driveway traffic. All MBTA parking under proposed conditions will be located at the northern portion of the site and most directly accessed by way of the existing MBTA Driveway. Existing commuters are accustomed to using this driveway and will likely continue to use this driveway. We are skeptical that the proposed signage associated with the Station project will effectively result in the traffic shifts assumed in the study. Nor are we comfortable with the suggestion made by FS&T that the proposed traffic signal could be timed to discourage access by way of the MBTA Driveway. (Any delays imposed on traffic destined to the MBTA would also impact traffic destined to Riverside Center.) Should the assumed traffic shifts not occur, traffic operations at the MBTA Driveway and Grove Street intersection will be worse than projected in the VHB study. This will result in longer than projected delays to pass through the

intersection when traveling to or from Riverside Center. Accordingly, we ask that the City require the applicant to conduct a sensitivity analysis that considers a less aggressive reassignment of existing traffic flows and that identifies alternative mitigation, if any, necessary to accommodate the alternative traffic patterns.

Grove Street North Access

We are pleased to see that FS&T took exception to VHB's assumed site traffic distribution relative to trips oriented to/from Grove Street north of the site. We raised this same concern in earlier correspondence. According to FS&T, the VHB study has understated the volume of project traffic using Grove Street North and consequently has also understated the expected impacts to the Riverside Center driveways. We look forward to reviewing the revised analysis and mitigation proposals, if any, requested by FS&T and to be prepared by VHB. We will want to understand how the alternative traffic pattern will impact expected traffic operations at the MBTA Driveway/Grove Street intersection and at Grove Street intersections with the Riverside Center driveways.

Option F

We concur with FS&T in finding that Option F, sole access by way of the MBTA Driveway with extensive widening of Grove Street, is not a viable option. However, we are concerned that FS&T has not documented their reasons for reaching this conclusion. We ask that their rationale be documented to preclude reconsideration of Option F in the event that the applicant fails to get MassDOT approval for Option B-2.

Roundabouts

FS&T noted that the modifications may be required relative to the design of the two proposed roundabouts on Grove Street. Acknowledging that the current plans are still conceptual, they indicated that the final designs may need to incorporate greater deflection on the Route 128 Ramp approaches to slow down traffic entering the roundabouts. Presumably, this would enhance safety for motorists, pedestrians and bicyclists. We support efforts to make the proposed roundabouts safe but also ask for the opportunity to review any plan revisions in order to understand how these revisions may affect roundabout capacities, delays and travel times to/from Riverside Center.

Rear Access Connection

We note that there was discussion at the peer review meetings of a direct roadway connection between the C-D Road, the development site and Equity's Riverside Center site. Obviously, any such connection will directly impact the operations of Equity's existing, occupied site. It is critical that Equity be kept apprised of any studies or other initiatives related to any proposed connection in order to assess impacts and offer comments.

Timetable for State and Federal Approvals and City Permitting

Many of the topics addressed in the City's Peer Review and the input from members of the community at the Peer Review traffic meetings result in the conclusion that material traffic

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mitigation is going to be necessary. In particular, the design and approval of the roundabouts; the Grove Street approach and signal timing, and very importantly, the integration of the C-D road access with Option B-2 all require planning, design, permitting, and construction before any component of the development project or the revised parking facility for the MBTA is built and go into service and monitoring thereafter for possible adjustments and further mitigation. We request that the City require these project mitigation conditions be approved before material time is devoted to further permitting of the development project.

In addition, Equity restates its position that the City (and State and Federal approval agencies to the extent applicable) require all the necessary mitigation to support Option B-2 be in place and functioning before any component of the development project or the new MBTA structured parking be implemented. The Peer Reviewers indicated that if Option B-2 becomes acceptable and viable, the approvals from MassDOT and the Federal Highway Department, based on their experiences, will "take a long time" to obtain and perhaps years; and that approval process cannot begin until the project and the mitigation is well defined. Thus, Equity requests that any Special Permits granted include conditions that (i) no building permits may be issued until all required approvals to implement Option B-2 and the other roadway improvements have been obtained; and (ii) no occupancy permits may be issued until all required onsite and off-site mitigation is constructed and operating as intended.

Thank you again for allowing us to meet with FS&T prior to finalization of the peer review report. We request that we be kept informed of all project development planning as it evolves. Please do not hesitate to call if you have any questions regarding the above.

Respectfully,

STANTEC CONSULTING SERVICES INC.



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cc. H. Levine, Esq., F. Stearns, Esq., John Conley, Kristen Faia, Eliot Weisman