



Alderman Ted Hess-Mahan  
Chairman, Land Use Committee  
Newton City Hall  
1000 Commonwealth Ave.  
Newton, MA 02459

RE: Riverside Station Docket # 258-12(2) and # 258-12

Dear Mr. Chairman:

Equity Office Properties owns and operates the office building and site located at 269-287 Grove Street, which contains 11.3 acres of land and a 505,000 s.f. office building. We have followed the Riverside Station Project, immediately next door, as it has evolved. Our principal concern continues to be Traffic and how the Riverside Project related traffic increases on Grove Street north of the site will impact access to and operations at our site and driveways. Likewise, traffic increases and proposed changes to Grove Street south of the site will affect the convenience of access to our site from Route 128. We expect that the City will impose measures to insure that access to and from our site continues to operate at their current levels and that any improvements to the MBTA/Riverside Station Site and any modifications to Grove Street and to the C-D connector road will not negatively impact access to or egress from our asset from and to Route 128. That is critical to our success as a significant taxpayer to the City.

We, therefore, engaged the services of Stantec to evaluate the Traffic analysis and information provided by VHB (the applicant's traffic engineer) and the City's Peer Reviewer of the VHB report, Fay, Spofford and Thorndike. On our behalf, Stantec has submitted two analytical letters to the City which contain suggestions, comments, and factual data some of which contradicts and/or disagrees with conclusions in each report, and now in the Planning Department staff report. In some cases, Stantec asks for a basis for the conclusion, not just the conclusion.

The most recent September 21, 2012 letter to Candace Havens, Director of Planning and Development, sets forth issues from Stantec's prior letter that were not and still have not been addressed by the Peer Reviewer and it identified issues of concern also raised in the Peer Review Report. The City Staff told Stantec that outstanding issues would be addressed by the City and not the Peer Reviewer. Stantec has had no response to its comments and the issues it raised. Thus, we requested Stantec to review the Planning Department staff report, dated October 12, 2012.

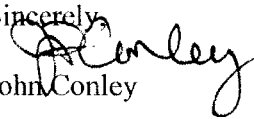
Attached is Stantec's analysis of the Planning Department Staff report as it relates to our concerns already set forth in the previous two Stantec letters, but not yet addressed by the Peer Reviewer or City staff. It lists our ongoing concerns, unanswered questions, and the concerns we

have about the conclusions and their underlying bases as set forth in the Planning Department staff report.

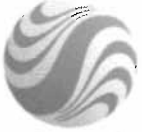
We request that our concerns be addressed during the public process and that satisfactory answers and solutions to our questions and comments will be provided and achieved.

Thank you.

Sincerely,

  
John Conley

cc: Members, Board of Aldermen  
Members, Planning and Development Board  
Candace Havens, Director of Planning and Development  
City Traffic Engineer



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**Stantec**

October 16, 2012

Mr. John Conley  
Equity Office Properties  
125 Summer Street  
Boston, MA 02110

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

Dear John:

We have reviewed the City of Newton Department of Planning and Development staff report dated October 12, 2012 regarding the above referenced project. As described below, the staff report acknowledges, but fails to fully address and/or embrace, the comments and suggestions set forth in our September 21, 2012 letter to Candace Havens (attached).

### **Traffic Analysis**

On page 9 the staff report concludes that the Traffic Impact Study prepared by VHB “provides the necessary traffic data needed to evaluate the potential future traffic impacts”. In our letter and in the Fay, Spofford & Thorndike (FS&T) peer review letter, the assumed trip distribution for project trips north and south along Grove Street was questioned. On the same page, the staff report notes that the petitioner is revising the traffic analysis and mitigation plans using a new trip distribution. Recognizing that consideration of a new trip distribution will change the findings of the operations analysis for Grove Street, the principal area of concern for Equity Office, we conclude that the anticipated project related traffic impacts on Grove Street are not yet known. We should expect the City to share any new analyses with us and FS&T when available and solicit our comments before reaching any final conclusions regarding the adequacy of the traffic study, the proposed traffic mitigation and the overall impact on access to your building.

### **Mitigation**

Also on page 9 the staff report concludes that the “traffic mitigation strategies proposed are generally well-conceived and address key impacts”. Again, it is difficult to understand how this conclusion was reached in the absence of any final traffic analyses. Furthermore, the report suggests that travel demand management (TDM) measures will be proposed to reduce traffic volumes on Grove Street north of the site and past the Equity Office property. Whereas the traffic study already takes credit for transit use in its future traffic generation forecasts, it is unlikely that a TDM program will significantly lower volumes on Grove Street north of the site relative to the projected volumes in the study. Regardless, the TDM program should be reviewed with you and the public.

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Relative to the proposed alternative access plans, the staff report does not present a clear preference between access alternatives A and B-2. On page 9, a statement is made supporting Option A as it would better accommodate pedestrians at the east roundabout on Grove Street. We are on record in opposition to Option A as it places more traffic on Grove Street relative to Option B-2 with greater negative impacts on access to your building.

The staff report acknowledges the sight line constraint on the C-D Road which jeopardizes the viability of Option B-2. The report suggests that the applicant consider installation of a roundabout at the C-D Road/Site Driveway intersection. The space requirements of a roundabout may be prohibitive at this location. In our letter we suggested that the petitioner reconsider earlier proposals for signalization or grade separation at this location. The staff report does not explain the extensive and time consuming State and Federal processes necessary to permit any changes to the C-D Road.

**Trip Distribution-MBTA Access**

We have questioned the assumed distribution of MBTA traffic between the potential two future access points, Grove Street and the C-D Road. The staff report asserts on page 11 that the assumptions made in the original traffic study are valid stating "entering the site via the C-D Road results in fewer delays because there are no stoplights and drivers can keep moving, even if more slowly due to the traffic calming effect of the roundabout". To our knowledge no data or analysis has been presented to support this claim. Additionally, the staff report seems to contradict this claim on page 13 where it states that "those entering the site from either direction can easily reach the MBTA structure". We remain of the opinion that the assumed traffic distribution underestimates the volume of site traffic using Grove Street and likewise any calculations provided to date of future traffic delays on Grove Street are invalid.

**Grove Street MBTA Driveway**

On page 11 the staff report notes that Equity Office supports the concept of providing two lanes rather one lane exiting on the MBTA driveway. We do in fact prefer the two-lane approach under the assumption that it will lead to more favorable signal timings for Grove Street traffic. On your behalf, we had previously requested that the City provide you with the opportunity to review and comment on the proposed signal timing plans when available to ensure that excessive delays are not imposed on through traffic destined to or from your building. The staff report does not mention this request. It should be a condition of any special permit.

**Bike Lanes**

The staff report advocates for bike lanes on Grove Street suggesting that vehicular travel lane widths may have to be reduced in order to provide bike lanes. Providing multimodal accommodations along Grove Street should be beneficial for your property; however, narrower

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travel lanes could restrict vehicular flow. Additionally, the limits of the suggested bike lanes are not clearly described. (Will the lanes extend north of the MBTA driveway? Will they go past your property?) Your interests would be best protected if the City allowed you to review and comment on the proposed sidewalk plans when available.

**Parking**

We noted that the parking ratio for the proposed office building is below industry standards. The petitioner has provided the City with a shared parking analysis that should explain how this issue will be addressed. We have not seen a copy of the shared parking study. Ideally, all site related parking demands should be accommodated on site to avoid any spillover to your property.

**Disclaimer**

There are a number of locations in the staff report where it states "All of the traffic engineers agree..." regarding certain findings. We have not been consulted by staff with regard to any of these findings and consequently note that the staff report does not speak for Stantec when it references all of the traffic engineers.

Thank you again for providing us with opportunity to assist you in the review of the Riverside Station project. Please do not hesitate to call should you have any questions regarding the above.

Respectfully,

**STANTEC CONSULTING SERVICES INC.**



Richard Bryant  
Senior Project Manager

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**Stantec**

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.

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**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

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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

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