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December 4, 2012

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

RE: Riverside Station: Docket # 272-12(2), # 272-12, 272-12(3), 258-12, 258-12(2)

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. Our special permit and zone change appear on the City's Website for the Riverside Station Projects. We have followed the Riverside Station Project, immediately next door, and the Hotel Indigo project, as they have continued to evolve. Our principal concern continues to be traffic and how the Riverside and Indigo Projects' 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 ask and expect that the City will impose measures and special permit conditions subsequent 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 to the Hotel Indigo 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 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 three 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 in the Planning Department staff reports. In several cases, Stantec asks for a basis for the conclusion, not just the conclusion.

We continue to be advised that unless the petitioner, BH Normandy, secures State and Federal approval of Access Option B-2 to the C-D connector road and not Option A, before a building permit is issued and that it is implemented before issuance of a certificate of occupancy, our asset and our tenants will suffer significant negative traffic impacts.

Stantec's September 21, 2012 letter to Candace Havens, Director of Planning and Development, sets forth issues from Stantec's prior letter that were not addressed by the Peer Reviewer and it identified issues of concern raised in the Peer Review Report. The City Staff told Stantec that all outstanding issues would be addressed by the City and not the Peer Reviewer. Stantec had no response to its comments and the issues it raised. Thus, we requested Stantec to review the next Planning Department staff report to determine if any of the issues raised had been answered and/or resolved. They were not.

That review was in Stantec's October 12, 2012 letter. It was an analysis of that Planning Department Staff report as it relates to our concerns that had already been set forth in the previous two Stantec letters, but which had not yet been addressed by the Peer Reviewer or City staff. After review of the Planning Department Staff report, the Stantec letter listed ongoing concerns, unanswered questions, and added the concerns we and Stantec have about the conclusions and their underlying bases set forth in the Planning Department staff report.

We requested that our still unaddressed concerns be answered and addressed during the public process that was about to begin and that satisfactory answers and solutions to our questions and comments be provided and achieved.

Unfortunately, our concerns were not addressed or answered by VHB, the City's Peer Reviewer, or the City Staff in writing or during the public process that began. With the hope our concerns would be addressed when the public hearings are continued, we requested Stantec to review all of its previous analyses in the context of any reports or analyses issued and presented by VHB, the City Peer Reviewer and/or the City Staff since its October 12, 2012 analysis for presentation to you. That analysis, dated November 30, 2012 is attached. It presents another review and analysis of the outstanding traffic issues yet to be addressed and/or resolved in writing or in the public process to date. The most significant, still, is a lack of approval from State and Federal Officials for Option B-2 for access and use of the C-D road. Five other major deficiencies and outstanding issues are summarized in the letter, along with several others.

We once again request that our concerns be addressed during the continuing public process and that VHB and the City provide satisfactory answers and solutions to our very serious concerns about negative traffic impacts on the operations of our asset. We are arranging meetings with the Director of Planning and City Traffic engineer to begin discussing the issues and, hopefully, to receive answers and resolutions that will be presented to your committee, to the Planning and Development Board, and to the Board of Aldermen during the remainder of the permitting and legislative process.

Thank you.

Sincerely,



John Conley

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



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Stantec

November 30, 2012

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

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

Dear John:

Per your request we have reviewed the City of Newton Department of Planning and Development staff report dated November 16, 2012 and an October 15, 2012 memorandum prepared by VHB regarding the above referenced project. The staff report seeks to address a broad range of comments raised at an October 16, 2012 public hearing for the project and comments on the applicant's response to an October 12, 2012 staff report. The VHB memorandum seeks to address comments raised by the City's peer review consultant, FS&T. Questions raised by Stantec on your behalf in prior correspondence with the City generally have not been addressed except where there is some overlap between questions raised by Stantec and by FS&T. Overall, the responses that have been provided by VHB only serve to validate the issues we raised in the past.

Overview

We understand that maintaining convenient vehicular access to/from Riverside Center, particularly by way of Grove Street South and Route 128, has been your principal concern throughout the Station at Riverside review process. Proposed intersection design changes and anticipated traffic volume increases on Grove Street at the Route 128 ramp terminals and at the MBTA station driveway could disrupt traffic flows to and from your office building. Similarly, projected traffic increases on Grove Street north of the Station at Riverside could negatively impact the operation of your site driveways and slow traffic approaching your property from the north. Our current assessment of potential traffic impacts along Grove Street associated with the Station at Riverside project is provided below.

Grove Street South-Route 128 Northbound Ramps

The traffic improvement plan for the Station at Riverside proposes construction of a single-lane roundabout at the Route 128 Northbound Ramps/Grove Street intersection. New analyses provided by VHB assuming a modified trip distribution (more site traffic oriented to Grove Street north of the site) indicate that operations at this location will vary considerably depending upon the site access conditions at the CD Road. (Site access conditions at the CD Road have yet to be resolved or determined.) As shown in Table 3 of VHB's memorandum, the intersection operates at only 70 percent of capacity during the PM peak hour assuming that left turns are allowed from the

site to the CD Road (Access Option B-2). Without left turns permitted, Option A, the intersection operates at a precarious 94 percent of capacity. As the detailed analysis worksheets show, the critical movement at the intersection, the one operating at 94 percent of capacity, is the southbound through movement on Grove Street. This movement would include traffic departing from your building during the PM peak traffic hour headed to Route 128 southbound or Route 16. The 95th percentile queue for this movement is reportedly 622 feet. These findings reaffirm the conclusion that the applicant must secure state and federal approval of Access Option B-2, and not Option A, in order to minimize traffic impacts to your property. The current findings quantify the significant negative traffic impacts that would be experienced by tenants of your office building destined to Route 128 during the evening commuter peak hour.

Grove Street South-Riverside Station Driveway

The existing unsignalized Station Driveway/Grove Street intersection will be reconstructed to support the proposed development. A traffic signal will be installed. A northbound left-turn lane and southbound right-turn lane will be constructed on Grove Street. Installation of the signal will by design add delays to through traffic on Grove Street traveling to or from your building. (As an unsignalized intersection, through traffic on Grove Street, the main street, has priority over the STOP-sign controlled side street, the Station Driveway.) VHB presented analyses in its initial traffic study showing that with the proposed geometric improvements and construction of a new site access drive at the Route 128 northbound collector-distributor (CD) road, the Station Driveway/Grove Street intersection would operate with only modest delays and limited queuing on Grove Street during peak hours. We questioned these findings based on the following:

- The assumed trip distribution for project generated traffic understated the percentage of traffic that is likely to be oriented to the north;
- The assumed assignment of traffic oriented to the south between the existing Station Driveway and the proposed CD Road Driveway understated the volume of traffic likely to use Grove Street and the Station Driveway;
- Consideration of an alternative trip distribution/assignment may indicate that the proposed northbound left-turn lane on Grove Street is undersized. (Overflow from an undersized left-turn lane would block the northbound through travel lane and delay traffic destined to your property.)
- The actual delays experienced by Grove Street traffic will be highly dependent upon the signal timing settings.

The latest submittal from VHB and the staff report only address the first of these items. VHB did provide alternative traffic analyses that consider a higher share of project traffic oriented to the north on Grove Street. As reported in Table 3 of their October 15, 2012 memorandum, this change in the assumed trip distribution does not significantly change the overall operations of the Station Driveway/Grove Street intersection. The results show the intersection operating at 82 percent of capacity during the more critical PM peak hour with either distribution. During this hour the

expected 95th percentile queue for southbound traffic on Grove Street (impacting traffic leaving Riverside Center) is 449 feet. No new analyses have been provided considering a greater use of the Station Driveway by traffic oriented to the south. In the absence of these analyses we cannot comment on the adequacy of the proposed northbound left-turn lane on Grove Street at the Station Driveway. Additionally, the staff report does not offer any assurances that Equity Office would have an opportunity to review and comment on the signal timing plans that would need to be prepared for the Station Driveway intersection should the development project move forward.

Grove Street North-Riverside Center North Site Driveway

We previously raised concerns that the unsignalized north driveway at Riverside Center would operate with long delays during the PM peak hour based on the original traffic impact analysis. The revised analysis provided by VHB, which assigns a higher share of The Station at Riverside traffic past this driveway, shows even greater delays for traffic exiting your site. Per Table 2 of the VHB memorandum the site driveway was originally expected to operate at 76 percent of capacity with average delays of 77 seconds per vehicle. The revised analysis shows operations deteriorating with an average delay of 117 seconds and a volume-to-capacity ratio of 90 percent. Furthermore, analysis results shown in Table 1 for the adjacent signalized center site driveway intersection with Grove Street indicate a 95th percentile queue on Grove Street southbound of 373 feet. This queue would block your north site driveway located only 225 feet away. (Even longer queues, in excess of 500 feet, are predicted for the morning peak hour however, more limited traffic volumes exit your site at this driveway during the AM peak hour.) No detailed discussion of this condition has been provided by the applicant nor have any mitigation measures been proposed.

Grove Street North-Woodland Road Intersection

Traffic approaching your site from the north or exiting to the north will pass through the Woodland Road/Grove Street intersection. This is a four-way, STOP-sign controlled intersection. (Police details have been used at this location during school arrival/dismissal times at the adjacent Williams School.) Table 2 of the VHB memorandum indicates that the intersection experiences traffic demands in excess of capacity under projected 2022 conditions without the Station at Riverside project built. The original traffic study showed the intersection operating at 114 percent of capacity with the Station project built. With the revised analysis operations deteriorate such that AM peak hour operations will reach 120 percent of capacity and PM peak hour operations will reach 128 percent of capacity. Again, no detailed discussion of this condition has been provided by the applicant nor have any mitigation measures been proposed.

Summary

Based on the above, the most important outstanding traffic issue relative to the Station at Riverside project is resolution of the proposed CD Road access plan. Only Option B-2 limits traffic impacts to Grove Street south of the site to acceptable levels. The applicant however, has not yet been able to

secure necessary approval of this plan from state and federal officials. Additional traffic issues of critical concern to Equity Office that have not been addressed are listed below.

- Provide updated traffic analyses for Grove Street intersections assuming a more realistic assignment of traffic oriented to the south between the existing Station Driveway and the proposed CD Road Driveway.
- Evaluate the adequacy of the proposed northbound left-turn lane on Grove Street at the Station Driveway based on the revised traffic analysis requested above.
- Assure Equity Office that they will have the opportunity to review and comment on signal timing plans for the proposed traffic signal at the Station Driveway before and after its installation should the project move forward.
- Provide a detailed assessment of expected project related traffic impacts and future traffic operations at the north Riverside Center site driveway and offer traffic mitigation as appropriate.
- Provide a detailed assessment of expected project related traffic impacts and future traffic operations at the Woodland Road/Grove Street intersection and offer traffic mitigation as appropriate.

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

Respectfully,

STANTEC CONSULTING SERVICES INC.



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