 **SCHLESINGER AND
BUCHBINDER, LLP**
ATTORNEYS AT LAW
1200 WALNUT STREET
NEWTON, MASSACHUSETTS 02461-1267

STEPHEN J. BUCHBINDER
ALAN J. SCHLESINGER
LEONARD M. DAVIDSON
A. MIRIAM JAFFE
SHERMAN H. STARR, JR.
BARBARA D. DALLIS
PAUL N. BELL
KATHERINE BRAUCHER ADAMS
JULIA V. WILDE
FRANKLIN J. SCHWARZER
RACHAEL C. CARVER

TELEPHONE (617) 965-3500
FACSIMILE (617) 965-6824
OF COUNSEL
ROBIN GORENBERG

May 23, 2016

Marc C. Laredo
Chairman, Land Use Committee
City of Newton
1000 Commonwealth Ave.
Newton, MA 02459

Re: 255 Newtonville Ave. Docket #48-16 - Response to Planning Memorandum

Dear Chairman Laredo;

The applicant has reviewed the Planning Department memorandum of May 20, 2016, and in addition to whatever other matters the Committee may wish to discuss we believe four items require response from the applicant.

Lighting

The report indicates that the prior plan had no lighting on the building. As stated in my letter of May 20 a revised lighting plan has been submitted showing low level lighting on the side of the building facing Lewis Terrace. The applicant deems that preferable to "security" lighting which might be turning on and off.

Hours of operation

The applicant has volunteered to use the most restrictive hours applied to any of the other three facilities in Newton, all of which have operated without issue or complaint for years. There is no custom in the industry and no reason for the property to be staffed other than during normal retail business hours, and that is a condition which would be unacceptable.

With respect to the access operating hours there is no experience or data indicating that the number of early morning trips would be excessive or even unusual in this Manufacturing District. The applicant is willing to agree to a "look back" provision in which at some period after opening the applicant will provide data as to usage of the property between 6:00 A.M. and 7:00 A.M. and report that data to the Director of Planning and Development, and if the Land Use Committee should determine that the level of activity is inappropriate to the site the hours of operation will be adjusted.

Marc C. Laredo
May 23, 2016

Roof

The Planning Department has recommended that a "green roof" be installed. The applicant continues to object to planting materials on the roof of the building because of the requirements for:

- additional structural elements in the building
- costs of installation
- costs of maintenance on a daily or weekly basis
- lack of cover during the winter
- use of water and expense of water
- security concerns of roof access

The applicant proposes that instead of a net waste of water that instead a portion of the roof be used as a rain collector through a cistern of a size to be determined so that water can be used in part to satisfy the maintenance obligations of the applicant for the new planting adjacent to Lewis Terrace. The cistern has been suggested by a neighbor and makes sense to conserve water and save money.

The applicant as suggested that the roof can be made less visible through the use of various colors of the Carlisle roofing system shown on Attachment C to my letter of April 27. While the most energy efficient colors are likely to be White, "Sand Stone" or "Sierra Tan", there are also various greens in the color palette.

Traffic Generation

The Planning Department has provided ITE Trip Generation data which we believe is substantially incorrect and misleading and is also contradicted by both industry studies and experience. While the Planning Department data is still favorable as to other allowed uses the ITE data projecting 142 vehicle visits per day significantly overstates the expected traffic to the site.

The ITE uses a category called "mini-warehouse" which includes the general product of "drive-up" facilities with rolling doors and typically larger units than what the applicant proposes as a multi-level interior access facility with smaller units. The "drive-up" facilities are most typically used for commercial enterprises and contractors who need daily access, while the multi-level facility is substantially but not exclusively used by household users who need only occasional usage. The physical set-up of the multi-level interior storage facility is more conducive to occasional use.

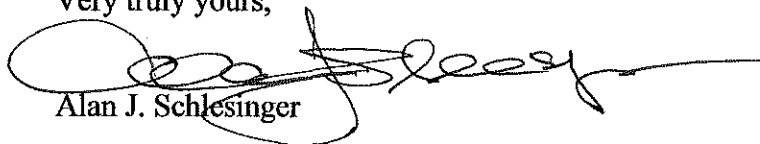
Although the ITE figures are lower than other uses they are out of line with experience, and the Self Storage Association has commissioned a "Traffic Generation Analysis" attached which discusses the actual results from surveyed facilities. Based upon those responses the data projects 6.8 round trips per day per 100 storage spaces or approximately 70 vehicle visits per day. This data is much more consistent with the

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observed data of Planning Horizons in September 2015 and May 2016 which showed 72 vehicle trips over 12 hours of observation at the Moody Street and Needham Street facilities, including Labor Day weekend.

Very truly yours,

A handwritten signature in black ink, appearing to read "Alan J. Schlesinger", written over a circular stamp or seal.

Alan J. Schlesinger

AJS:sjk

cc: Land Use Committee
Alexandra Ananth, Michael Gleba



APPENDIX 3: TRAFFIC GENERATION ANALYSIS

TRAFFIC GENERATED BY SELF STORAGE FACILITIES

Prepared by:

*Economic Consulting Associates
201 E. Southern Avenue, Ste. 206
Tempe, AZ 85282-5140*

OVERVIEW

Economic Consulting Associates, Inc. conducted a study to determine how much traffic is generated by self storage. The study was performed under the sponsorship of the Self Storage Association.

Questionnaires were prepared and made available to members. An independent analysis of the results was performed. Respondents ranged from very small to very large facilities throughout the United States.

Details of our study report follow.

PURPOSE

The aim of this study is to accurately measure and determine how much traffic is generated by self storage facilities. To this end, the Self Storage Association (SSA) contracted with Economic Consulting, Tempe, AZ, a firm with experience in this field, to conduct an independent study.

APPROACH

The SSA prepared a standard questionnaire that self storage operators could use to record traffic data. The form was delivered to all members of the SSA and was also publicized on the Internet, in meetings with operators, and through other distribution channels (see form in Appendix B, Page B-1).

Completed questionnaires were returned to the association and were provided to us for analysis. ECA inspected the questionnaires, obtained additional

information by calling respondents when data were incomplete or required clarification, checked the addition on the forms, assembled and analyzed the data and provided this report of the results.

Certain questionnaires were not used in the study for a variety of reasons, which included illegibility, they were incomplete or the respondent's facility was not a typical self storage business. The latter included a combination self storage and office warehouse and another which was primarily an RV storage, for example. Since only one questionnaire was received for Canada, it was also excluded. Only facilities that had seven day a week access were included in the analysis, since nearly all of the respondents were open for business Sunday through Saturday. To include others that did not operate seven days a week would have been inconsistent, in our opinion. Finally, data was based on computerized gate entries during the months of April through June of 2001.

RESPONDENT PROFILE

This study contained 158 usable responses. While this is a small fraction of the 35,000 plus facilities in the U.S., it is the second largest response of any publicly available study on this subject. ECA conducted a prior self storage traffic analysis on behalf of the Mini-Storage Messenger magazine in February 1996 ("Dispelling the Self-Storage Traffic Myth") that was based on data from over 250 facilities. The SSA study is believed to be more representative of the industry, because this current data is based on the average sized facility of 45,000 square feet from over 90 cities in the United States. The response in the earlier study was based on information from facilities smaller than the average project.

The mode of respondent facilities in this current study contained 500 to 599 spaces and nearly one-third (31.65%) had 600 or more spaces, for example (see Table 1).



TABLE 1
RESPONDENTS BY
NUMBER OF SPACES

SPACES	NUMBER	% OF TOTAL
100-199	4	2.53
200-299	7	4.43
300-399	22	13.92
400-499	34	21.52
500-599	41	25.95
600-699	23	14.56
700-799	12	7.59
800-899	4	2.53
900-999	4	2.53
1,000-1,099	2	1.27
1,100-1,199	2	1.27
1,200-1,299	2	1.27
1,300-1,399	0	0
1,400-1,499	0	0
1,500-1,599	0	0
1,600-1,699	0	0
1,700-1,799	1	0.63
Total	158	100.0%

Source: Total and percentage computed by Economic Consulting Associates.

The average size of respondents was 59,451 rentable sq. ft. (see Table 2).

TABLE 2
AVERAGE SIZE OF RESPONDENTS
(In Rentable Sq. Ft.)

Total Rentable Sq. Ft.	9,279,113
No. of Respondents	156*
Average Size	59,481

*Two did not provide rentable sq. ft.

Source: Average computed by Economic Consulting Associates.

Respondents facilities ranged in size from 13,000 rentable sq. ft. to over 160,000. An analysis of respondents by rentable sq. ft. is shown in Table 3. It

shows that the mode was between 50,000 and 59,999 rentable sq. ft. The greatest concentration of respondents were in the 40,000 to 70,000 range.

TABLE 3
AVERAGE SIZE OF RESPONDENTS
(In Rentable Sq. Ft.)

	NUMBER	% OF TOTAL
10,000-19,999	3	1.92
20,000-29,999	6	3.85
30,000-39,999	18	11.54
40,000-49,999	29	18.59
50,000-59,999	33	21.15
60,000-69,999	27	17.31
70,000-79,999	13	8.33
80,000-89,999	12	7.69
90,000-99,999	8	5.13
100,000-109,999	4	2.56
110,000-119,999	1	0.64
120,000-129,999	1	0.64
160,000-169,999	1	0.64
Total	156	99.99%*

*Does not total 100% due to rounding.

The Western Region of the Self Storage Association had the largest number of respondents, followed by the Southeast region (see Table 4). This is consistent with fact that the former is the largest, in terms of membership. A list of states by SSA Region is provided in Appendix 2

TABLE 4
RESPONSE BY REGION

	NUMBER	% OF TOTAL
Northeast	25	15.82
Central	29	18.35
Southeast	48	30.38
West	56	35.44
Total	158	99.99%*

*Does not total 100% due to rounding.



There were some differences in by region in the average size of respondents in rentable sq. ft. when compared to the total response. The Central and Western Region respondents were larger than those in the Northeast and Southeast Regions (see Table 5).

TABLE 5
RESPONDENT SIZE BY REGION

(In Rentable Sq. Ft.)

	SQ. FT.	NO. RESPONSES	AV. SIZE
Northeast	1,402,884	25	56,115
Central	1,797,708	29	61,990
Southeast	2,694,203	47*	57,323
West	3,384,318	55*	61,533
Total	9,279,113	156	59,481

*One respondent from each of these regions did not list sq. ft.

Source: Totals and percentages computed by Economic Consulting Associates.

They also had more spaces (see Table 6).

TABLE 6
RESPONDENT SIZE

(In Number of Spaces)

	SPACES	NO. OF RESPONSES	AV. SIZE IN SPACES
Northeast	12,489	25	500
Central	15,736	29	543
Southeast	25,182	48	525
West	34,006	56	607
Total	87,413	158	553

Source: *Ibid.*

TRAFFIC GENERATION

An average of 6.82 vehicles per day entered these facilities for every 100 self storage spaces, according to our study results (see Table 7).

TABLE 7
TRAFFIC GENERATED BY SELF STORAGE

Vehicles Entering Facilities/Day	5,965
Total Spaces In Facilities	87,413
Average R/T's Per Space/Per Day	.0682
Av R/T's Per Day/Per 100 Storage Spaces	6.82

This means that if a facility had 500 storage spaces, it would generate an average of 34 cars per day. For 700, it would average 48 (see Traffic Generator Calculator in Table 8).

TABLE 8
TRAFFIC GENERATOR CALCULATOR

(Based On 6.80 vehicles per 100 self storage spaces)

NUMBER OF SPACES	AV. VEHICLES GENERATED
100	7
200	14
300	20
400	27
500	34
600	41
700	48
800	55
900	61
1,000	68
1,100	75
1,200	82
1,300	89
1,400	95
1,500	102
1,600	109
1,700	116

This is less than the 8.33 vehicles per day per 100 spaces that we found in our 1996 study performed for the O.



There is little difference among three regions in traffic generated per 100 vehicles. The fourth, Central Region, shows somewhat higher vehicular traffic generated (see Table 9). But, the overall amount of traffic generated for any region is small.

Another factor that can affect traffic generation is the size of spaces offered. It is generally recognized in the industry that small spaces turnover more often, therefore generating more traffic. The reverse can also be said about larger spaces (10x20 and larger). Those who rent them normally stay longer and there is less

TABLE 9
TRAFFIC GENERATED BY REGION

	CAR/DAY	SPACES	AV. CARS/SPACE/DAY	AV./CARS/DAY/100 SPACES
Northeast	805	12,489	.0644	6.44
Central	1,273	15,736	.0809	8.09
Southeast	1,619	25,182	.0643	6.43
West	2,268	34,006	.0665	6.65
Total	5,965	87,413	.0682	6.82

It should be noted that data should be considered in total despite the previous regional analysis. This is because the number of questionnaires for individual some regions are relatively small.

FACTORS AFFECTING TRAFFIC GENERATION

Several factors can influence the amount of traffic generated by self storage. They include whether businesses are operated from a storage facility, their type and size of spaces offered, for instance.

Certain businesses can affect the volume of traffic through a self storage facility. They include auto body shops and those selling merchandise directly to the public from a storage space. However, they normally do not operate from these facilities, because of storage operator restrictions on storing hazardous materials and local zoning ordinances prohibiting such customers from operating from these facilities.

turnover of these spaces.

CONCLUSION

The data shows that self storage generates little traffic and is consistent with a prior studies.

⁵ Proprietary research conducted by Economic Consulting Associates, Tempe, AZ.