



31 May 2019

Larry Gottesdiener  
Chairman and CEO  
Northland Investment Corporation  
2150 Washington Street  
Newton, MA 02462

Mr. Gottesdiener:

This letter is in regards to petitions #425-18 and #426-18, your proposal to develop 14 buildings varying in height from 3 to 8 stories with a total of 800 housing units (123 of which will be affordable), 180,000 square feet of office space and 115,000 square feet of commercial space on a 22.6 acre site at Needham and Oak Streets.

Much about the project is to be commended. The lot is under-developed; Newton needs the housing; and the site design is well-considered. Additionally, Northland is proposing an ambitious program of transportation demand management, the keystone of which is a privately funded, publicly available shuttle service.

However, Northland's parking allotment undermines its commitment to its own transportation demand management program. Northland has proposed 1,450 parking spots, with additional capacity to flex up during holiday season. This breaks down to 800 parking spots for the residential units, a 1:1 ratio, and 650 parking spots for the commercial tenants. We recommend **1,050** parking spots, retaining the 650 parking spots for the commercial tenants and lowering the residential ratio to 0.5, or in another configuration that you propose. You could retain the holiday flex parking capacity at your discretion. We also recommend closing the Oak Street entry/exit to all vehicles but shuttles and emergency vehicles.

Reducing the parking-spot allocation, in tandem with the planning department's 'measure, monitor, and enforce' initiative to cap car-trips, is the city's best assurance that you are committed to traffic mitigation in the long term. Traffic is the neighborhood's most severe concern and deserves special consideration. Traffic is also a regional vexation that is getting worse. We must plan and develop away from the car.

Northland has three critical stages to go: financing, leasing, and then operating. At each stage, your incentive is to internalize the benefits of more parking while externalizing the costs of more traffic. By the time the city starts measuring and monitoring, Northland will have signed covenants with your creditors, marketed to your tenants, and established standard operating procedures with your managers. All these activities are path-dependent on your parking allotment. If you build more parking, we will all get more driving. In contrast, if you finance, market, and operate in a parking-constrained format, the city can be assured that we have a partner committed to other modalities, including the shuttle service.

Northland and the city must bake into this project, during its very conception, the economic incentive to plan & develop away from the car.

Jake Auchincloss  
Andreae Downs