

Memorandum

To: Marc C. Laredo
CC: Nadia Khan
From: Alan J. Schlesinger
Date: October 23, 2019
Re: Northland Newton Development

At the October 15th working session of the Land Use Committee, you stated your preference that the Northland traffic monitoring program be on the basis of total traffic in/out of the site including office, residential, commercial, and public uses, and that a cap be applied against that total. You noted that such a count has the advantage of simplicity in that it is mechanical. We have given the matter considerable thought.

In contrast to your suggestion, Northland , with the guidance of a nationally recognized TDM expert, has adopted the City's peer reviewer's recommendations that:

1. For the first time ever in Newton, a TDM plan be measured by results and not by input or resources applied; and
2. The TDM plan be focused on program elements which are controllable such as residential and office uses where TDM can be effective and not focused on retail/public uses where (i) it is likely to be ineffective and (ii) it could, in turn, threaten the placemaking objective of the development.

Northland has agreed to a trip reduction program as shown on Exhibit A which shows the "unadjusted" numbers for office and residential and the resulting numbers after TDM. The TDM program includes regular monitoring and reporting including, in Draft Condition 63 (f), biennial counts of total trips. You have asked why Northland should not use a metric of calculating total trips including retail and public trips with a cap on traffic generation. There are several reasons:

1. The total counts are not a reflection of the effect of NND. The pass-by trips from shoppers on Needham Street, the parkers for the splash park or the open spaces, the people who drive in to look around or turn around would all be counted but should not be. It is a core objective of NND to create a lively and active destination with a blend of private and public uses. Efforts or resulting penalties to curtail public (including retail patronage) uses will most certainly hurt the success of the project and not produce the desired benefit for the community as expressed in the Needham Street Vision. Having a good traffic count because of vacant retail space is bad, and at various times a particular use might have a different effect on different days or different times of the day
2. The gross count metric is not a measure of the effect of the TDM plan which is better measured by the effect on the target audience.
3. TDM will be effective as to commercial and residential tenants, but not as to retail users. The owner does not have direct relationships with retail/restaurant customers, and based on the assessments of our consultants and the peer reviewer retail customers are unlikely to participate significantly in TDM measures. Northland does have direct relationships with the office tenants, and their employees and with residential tenants, all of whom will use transponders for garage access. Entry and exit data from the transponders will be available to track office and residential traffic patterns, and Northland can communicate with the office tenants and residents and balance the TDM elements as needs arise. That is not true of either the retail or the public uses.
4. Gross traffic generation is not an appropriate metric where trip generation for the proposed project is smaller than a project which could be built as a matter of right. Whether the property is in the current MU-1 District or the proposed BU District, in either district about 1,479,000 s.f. of building is allowed on the site. This project is 1,403,000 s.f., so no matter what use is made, the building mass and the resulting generation are less than what is allowed, and no TDM is mandated for an “as right” development.
5. NND is not the source of the existing Needham Street traffic congestion. Councilor Kalis cited the MAPC study that about 70% of the Needham Street traffic is cut-through traffic to Needham. The site currently holds 193,000 s.f. of vacant office to be occupied and 70,000 s.f. of retail/commercial to be replaced by 115,000 s.f. The 45,000 s.f. of additional retail/commercial space is the equivalent of one more Marshalls store – 40,000 s.f. There are 800 housing units, but we refer to Exhibit B attached from the Planning Department presentation and to the traffic reports and peer review showing that the AvalonBay property driveway is operating at LOS A. NND adds the units, which simply are not a problem, and one store the size of a junior retail box.

6. Northland intends to implement an expensive, targeted and effective TDM program unprecedented in Newton in order to reduce trips with a mandatory target of high effectiveness. Northland is proposing a dual counting system with both transponder and intercept surveys, so they will be able to use each method to determine the accuracy of the information and fine-tune the data over time.

Northland is dramatically addressing off-site issues by agreeing to payment of \$5,000,000 to the City specifically targeting area traffic issues. Working inside the project and outside in the neighborhood will provide substantial mitigation of existing conditions in addition to mitigating effects of the project.

You asked whether the counts would consider employees or residents who might be using TNC's (UBER). Those people, either residents or workers, would not appear in the transponder count since they do not leave the garage, but they would appear in the intercept data. The intercept survey method has been successfully used in other projects and together with the transponder counts will provide an accurate overall picture.

The Council has pressed Northland to provide the absolute minimum of parking spaces which can serve the community, and we must all recognize that to some extent, on some days in some seasons, that will increase the use of UBER. Maybe on rainy days there are more vehicle trips, and maybe on sunny days there are fewer.

Most importantly Northland has taken significant steps and made substantial changes to minimize traffic impacts including:

- (i) Reduce commercial space. We are aware this is not your first choice, but the effects are dramatic. Again, Exhibit B from the Planning Department presentation shows the comparative effects of residential and commercial uses. 800 units of housing has the same vehicle generation as 350,000 s.f. of office and under 100,000 s.f. of retail. By reducing the retail from 237,000 s.f. in 2018 to the current 115,200, *unadjusted* retail PM traffic was reduced in the VHB reports from 1564 trips to 603 trips. The unadjusted numbers do not account for "internal" generation or "pass-by", but as raw data the 900 vehicle difference is significant;
- (ii) Mix the uses. The reduction in traffic generation is achieved by mode share, i.e. the ability for people to connect by bicycle or transit or walking or by not having to leave at all, and by internal capture, residents who can shop at the stores and restaurants, office workers shopping and eating, and pass-by trips – people coming who are already on Needham Street and making NND one stop among others;
- (iii) Reduce the onsite parking. The reduction in onsite parking is intended and expected to encourage a car-free or "car-lite"

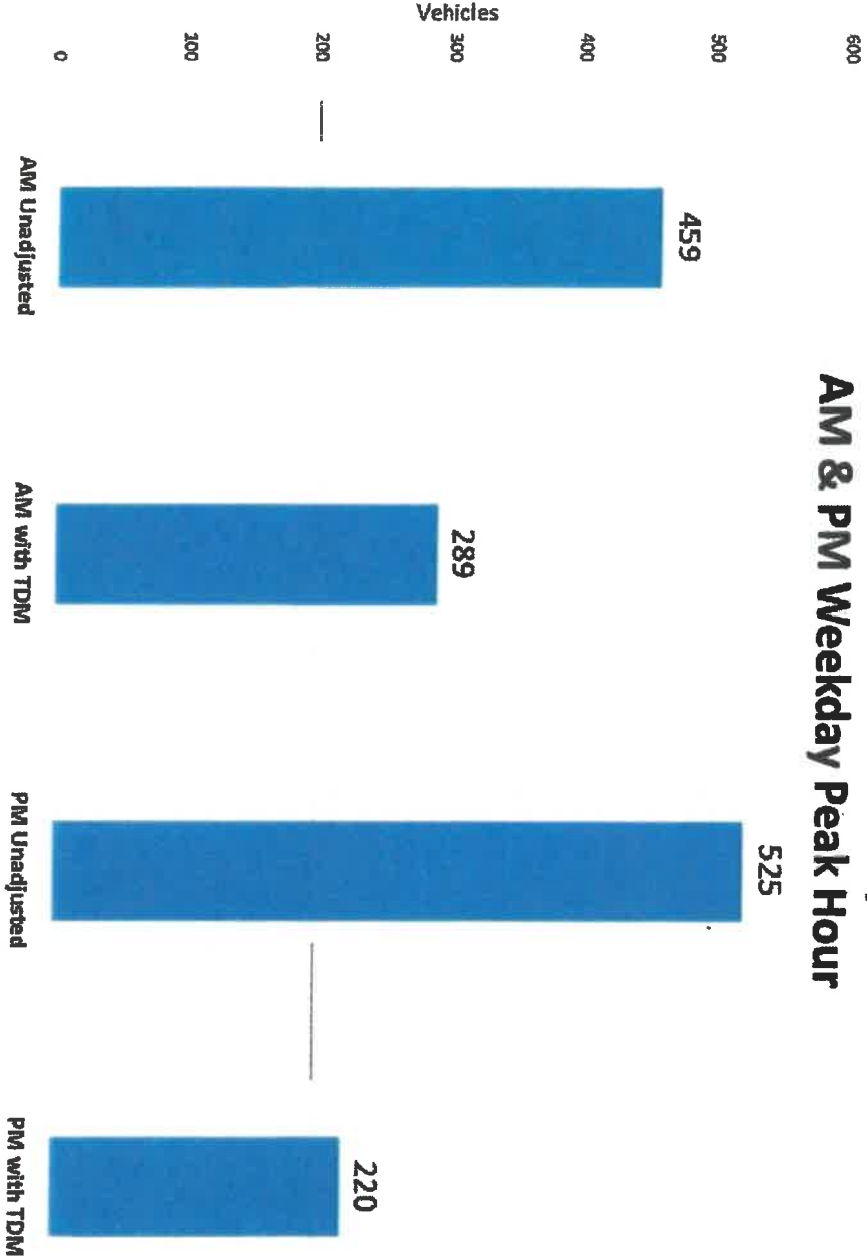
lifestyle. On balance and in the longer run the limited onsite parking will reduce traffic.

- (iv) Aggressive TDM Plan. TDM measures are proven effective for office and residential users, and according to Nicole Friedman, the part that works is paying people in one form or another not to drive. Northland is proposing an enormous allocation of resources to achieve a goal.

In summary – you have asked why Northland does not simply count the drivers going in and out of NND and agree to a cap. Our response is that:

1. It is the wrong thing to measure, providing misleading information on the wrong question.
2. The worst case traffic generation scenario for the City is the as-right development.
3. The City's peer reviewer and Planning Department have proposed an innovative, targeted TDM plan with a concrete objective and concrete results, without any cap on the developer's obligation to perform. Northland's TDM program includes frequent free shuttle service and offers both significant financial incentives to residents and employees.
4. Targeting or attempting to control the retail customers and public visitors to the site will be ineffective and counter-productive to the activity which NND wants to generate.

Office and Residential Vehicle Trip Reduction AM & PM Weekday Peak Hour



Vehicle Trip Generation Comparison - PM Peak Hour Unadjusted Vehicle Trips

