

Section Overview

Transportation — Private and Public

The developer assumes that his renters will own fewer cars than average Newtonians. Therefore, (a) the impact on traffic will be inconsequential, and (b) overflow parking onto surrounding streets will likewise be no problem.

The primary justification for claiming fewer cars is that the development will be located in a "transit-oriented" location, where public transportation is easily available. In addition, bicycles will replace many cars. And a large portion of the development will house elderly or poor people who cannot or do not want to drive.

In response, we say:

- *Car ownership and use.* The area is not sufficiently transit-rich. It does not qualify as a "transit neighborhood" by standards of *Reconnecting America* and the *Center for Transit-Oriented Development*. Newtonville's commuter rail service, the primary means of transport downtown, is patently below reasonable standards, and its bus service is spotty.¹ Newtonville is not in the same transportation league as those village centers that are served by the Green line.²

Some people will be satisfied with public transport for getting to and from work, but they will still want cars for other purposes — shopping, going to entertainment, visiting friends, taking longer trips. For people who can afford it, a car is treated pretty much a necessity. And for people who work outside Boston, a car may be an absolute necessity, even if it's difficult to afford.

75% percent of the renters will live in 'market rate' apartments. They will have enough money to own a car. The other 25% are very likely to own, given that the lowest income will be 50% of AMI, which is low but nowhere near poverty.

As for bicycles, we hope people will ride them as often as they can, but we do not see bicycles replacing cars in the New England climate and with very limited bicycle-friendly streets.

¹ Bob Kavanagh: *My Experience with Our Public Transportation*.

² NBN Contributors: *Transit-Oriented Development: It Does Not Apply to the Washington Place Proposal*.

- *Parking:* Our village center's existing reservoir of 56 free parking spaces is nowhere near enough to accommodate the estimated 177 extra vehicles that Washington Place would generate in conjunction with vehicles from Austin Street.³ The shortage will occur largely because Mr. Korff has asked for numerous waivers of parking regulations.⁴ *Parking is likely to be an even bigger problem than traffic congestion.*
- *Traffic.* We have looked carefully at the developer's traffic study (by the firm VHB).⁵ We don't find it convincing. VHB has looked at our criticisms and credibly countered many of them, but the most essential fact is that data were collected on just *one day*, and in too restricted a set of places. VHB did follow "standard industry practice," but that practice is not a valid approach.

Newtonville traffic varies a great deal, from day to day (randomly, it seems), from hour to hour, from season to season. VHB says that they have taken all this into account, but besides the fact that their one-day sample is inadequate, we residents (who use the Orr Block or pass by it frequently) know that the existing stores there are nearly unused at present except for a Boston Ballet Studio.

But the rest of the commercial space at Orr has very few customers in the evening. Karoun restaurant should be the main draw, but even Karoun is almost deserted on weeknights except for occasional functions. If Mr. Korff's plans for commercial space succeed, the new businesses will produce at least as many drivers at evening peak as the Ballet Studio does now. And then there are the new inhabitants of his 161 apartments.

So we have no doubt that the new building will increase traffic, though how much is hard to say.

But beyond the Orr Block's impact, the precedent set by the vote will be very important. If rezoning is approved and Washington Street becomes a corridor of MU4 development, as is touted by the city administration, the combined effect on traffic will be substantial, even if any particular development has only a modest impact.

³ Based on Peter Bruce's analysis of a consultant's (GPI's) report and his own independent study: *It Just Doesn't Fit: Washington Place's Impact on Newtonville's Parking and Commerce.*

⁴ Naomi Myrvaagnes: *Dimensional Requirements and Parking Waivers for the Orr Project.*

⁵ NBN contributors: *Critique of the VHB Traffic Study.*

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My Experience with Our Public
Transportation
Bob Kavanagh
At the Land Use Committee, June 7, 2016

My name is Bob Kavanagh and I live at 69 Court Street in Newtonville. My main focus tonight is the state of public transportation in Newtonville and the recurring theme that Newtonville is a great location for TODs. This mantra has been invoked for Court Street (36 units), Austin Street (68 units) and now for the Orr Building (170 units).

Since my wife Carole and I have lived on Court Street for almost 36 years, I have some experience with using the public transportation available in Newtonville. Our home is a mere 2 minute walk from the Newtonville train stop. It is my experience that under certain very restricted conditions, public transit in Newtonville is useful. For example, when my wife and I took Amtrak out to SF in 2005 and to Seattle in 2010, we took trains the entire way. We walked up to the Newtonville station and proceeded to South Station to catch the Lake Shore Limited to Chicago and then on to the California Zephyr to SF and the Empire Builder to Seattle. The same is true for a trip I made to Atlanta in 2012.

However, when I went to Fenway Park this past Saturday for a 4:05 game against the Blue Jays, not so good. Look at the train schedules supplied by Vanasse Hangen Brustlin Inc (VHB) and notice the lack of off-hour trains. You can't get there from here with any convenience.

How accessible is the Newtonville station? I so remember when my wife was pregnant with our second child and commuted to BU Medical School in the South End. I would take our two-and-a-half year old to the station, walk down the stairs with her (what fun) and wait for my wife's train to arrive. I would then help Carole up the very steep stairs along with our first daughter. Nothing has changed in the 34 years since this was our routine. And please, let's not pretend that this situation is going to change anytime soon.

There is not one current accessible station on the commuter rail between W. Natick and Yawkey. Since Auburndale is now budgeted for accessibility, it is difficult to believe that any other Newton stop will be remodeled before a Wellesley station is properly configured. If one is commuting to South Station, the commuter rail works. Otherwise, it is really not an attractive means of transportation.

By the way, I have a Senior Citizen Charlie Card but can't use it on the commuter rail.

One anecdote if I may:

An acquaintance told me that her niece will be staying with her here in Newtonville. The niece works near Wellesley Square. The aunt said, great, we are on commuter rail, so you can take it there, since you don't have a car. Guess what--even though both locations are on the commuter rail, it doesn't work, as there are no outbound trains until 10:35. Not really true, there is a 5:19 AM train for early risers. There are no inbound trains that stop in Newtonville when the niece gets off work. The answer to this problem apparently is to not work to the west of Newtonville.

Finally, between 1:18PM and 7:37PM, there are no inbound trains at all available at the Newtonville stop. You can't even flag one down.

Now, you hear some people argue the point that with a massive increased population in Newtonville, the MBTA will have to improve the service at Newtonville. Well, we can always play Peter Pan and wish for miracles. MBTA has scheduling logistics and they need to prioritize service to the outer zones of commuter services. These people pay three times the fare that commuters do in Newtonville (zone 1). Also they know that people in Auburndale, West Newton, and Newtonville have the option to take the Express Bus into Boston via Mass Pike on weekdays. So Newton locations are not high priority.

As for the bus, VHB included schedules for the two express buses that run near Newtonville. The most disheartening thing about the bus schedules is the lack of weekend service. The 554/556/558 has none at all, while the 553 doesn't run on Sundays. Don't plan your schedule around this mode of travel.

You, the Newton City Council, need to take into consideration the excessive development already happening in Newtonville (Court Street and Austin Street). The next time you drive or take public transit to the Arsenal Mall, look at the construction on that street. According to another acquaintance who takes the bus, it takes 15 minutes for the bus to get around Newton Corner rotary. She is seriously dreading what her commute will look like in 2 years.

I simply ask that if you are going to vote in favor of Mr. Korff's project, please don't claim that one reason you are in favor of it is because it is a vaunted transit-oriented Development. I would simply remind you of what Mr. Robert Engler, a well-known Newton developer said about his own development on Court Street which was touted as a TOD. On September 3, 2014 at the ZBA hearing on Court Street, Mr. Engler said: "We are all hung up on TOD. It's close to transportation, that doesn't mean everyone going to Boston is on that train".

Please ask Mr. Korff how many residents of his project will be using public transportation. Will he be forced to agree with Mr. Engler, who wrote to me on July 1, 2013 when I asked

who his studies showed would be buying condos in a TOD. He responded that "we do not have any formal studies, and cannot make any guarantees." By the way, the city has never done a formal study about who is desirous of moving into Court Street and Austin Street and the Orr Building. The widely claimed migration of downsizing seniors and millennials is simply hearsay.

Transit-oriented Development:
It Does Not Apply to the Washington Place Proposal
By: Members of Neighbors for a Better Newtonville

The Issue: Would the Korff Development Be a Transit-oriented Development?

The introduction to *Request for a Zone Change at Washington Place*, submitted by the developer Mark Newtonville LLC, states that the Washington Place development on the Orr Block site is a transit-oriented development:

MI, through its affiliate Mark Newtonville, LLC ... proposes to redevelop the block situated between Walnut Street and Washington Terrace into a vibrant, innovative, *transit-oriented mixed-use development*. [emphasis added by us]

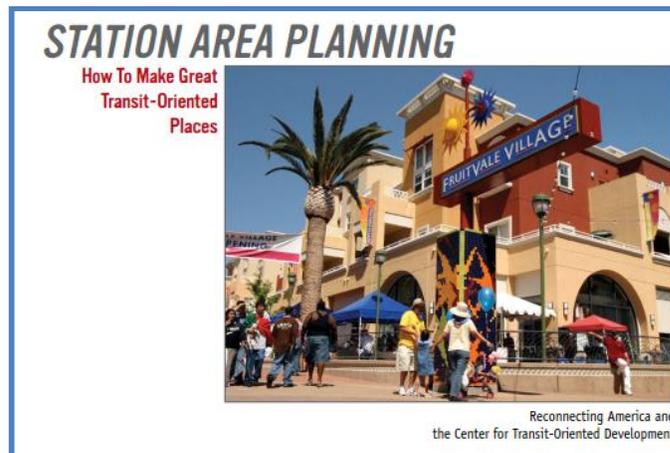
This claim is not true. Newtonville Village Center does not qualify to be designated as a transit-oriented development (TOD) site, because transit-oriented development is based first and foremost on the existence of adequate public transport — which Newtonville definitely lacks.

Authority for Our Position

Our position is based primarily on the work of an organization called *Reconnecting America* and its affiliate, the *Center for Transit-Oriented Development*:

Reconnecting America is the only national nonprofit organization devoted to promoting best practices in transit-oriented development (TOD) and development-oriented transit. Our *Center for Transit-Oriented Development*, a collaboration with the Center for Neighborhood Technology and Strategic Economics, has been funded by the federal government [Federal Transit Administration] to serve as a national TOD best practices clearinghouse.
www.reconnectingamerica.org

In particular, we reference their "TOD202" Manual for Station Area Planning: How to Make Great Transit-Oriented Places."¹



We will also reference the *Transit Oriented Development Institute* (tod.org), which is a project of the US High Speed Rail Association. This organization has a certification process for TOD areas. We used their eight certification criteria to form a judgment on the potential contribution of the Washington Place proposal to a TOD neighborhood.

TOD's First Principle: Good Transportation

TOD requires first of all good transit. Where adequate transit is lacking, all the other elements can be in place, but they are an empty shell. The Transit Oriented Development Institute explains that "getting the layout of the station right is one of the most important early moves that will lock in desirable or undesirable patterns, and dictate many factors including pedestrian and bicycle use, level of traffic all around the station, quality of station area development, location of cafes and retail, and overall success of the rail system."

A transit station should be a "safe, pleasant, lively environment ... [with] easy access, [and] plenty of bike parking in multiple locations" and that "provides safety of the young, the elderly, and the mobility impaired."

The Washington Place proposal suggests the opposite: that if we build the housing and other amenities, the transportation will follow. That might be true for some communities, but

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http://media.metro.net/projects_studies/tod/images/Reconnecting%20America%20%E2%80%93%20Station%20Area%20Planning.pdf

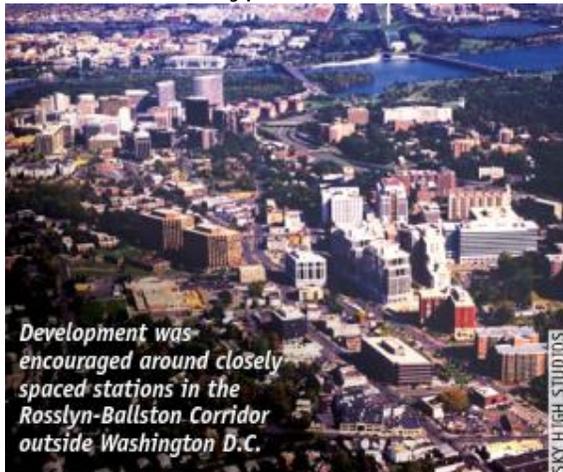
certainly not for Newton. The MBTA is struggling to achieve its highest priority goals and will be for the foreseeable future. And adding to this situation, the voters of Massachusetts regard Newton as an elite, wealthy enclave, not a prime candidate for scarce public dollars.

Newtonville Village Center: Are We a "Transit Neighborhood"?

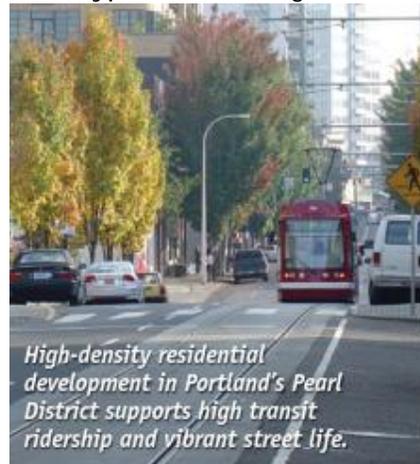
According to *Reconnecting America*, a transit-oriented development requires that stores and buildings in a given location be appropriate for the transit capacities of that location.

The TOD202 Manual provides a classification of eight *Place Types*. For example: an Urban Center place type is very different from an Urban Neighborhood place type. These place types differ completely in the scale and type of transit, buildings, and businesses that they need.

Place Type: Urban Center



Place Type: Urban Neighborhood



The most modest place type is called a Transit Neighborhood. Newtonville Village Center (NVC) would be a Transit Neighborhood if it qualified as a TOD place.

Here are key characteristics of a Transit Neighborhood.

Characteristics of a "Transit Neighborhood"

<i>Transit modes</i>	LRT/Streetcar, BRT, commuter rail, local bus
<i>Peak frequency of transit</i>	15-30 minutes
<i>Characteristics of the station area</i>	Predominantly residential district organized around transit station
<i>Land use mix and density</i>	Low- to moderate- residential uses with supporting commercial and employment uses
<i>Retail characteristics</i>	Primarily local-serving retail opportunity
<i>Major planning and development challenges</i>	Integrating moderate-density housing and supporting local-serving retail

Source: TOD202 Station Area Planning manual

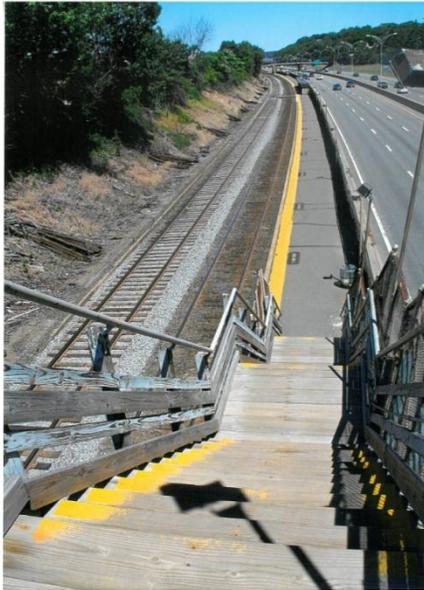
On the plus side, it's true that NVC is served by two of the transit modes: commuter rail and local bus. And the surrounding area is predominantly residential, with "supporting commercial and employment uses."

The Commuter Rail — Not Adequate

But having two transit modes is hardly enough to qualify. The primary requirement is adequate transit. At NVC, the prominent mode of public transit is the commuter rail service. It must be said that the commuter train ride itself is comfortable (when you get a seat) and quick. In about 20 minutes after stepping onto the train at NVC, you will be stepping off downtown. So it's particularly galling that our commuter rail service doesn't measure up in crucial ways.

First, the station is notoriously difficult to access. It is depressed from street level; the only way to get to it is by a steep 36-step staircase from the Walnut Street Bridge or a similar staircase from Harvard Street. Even able-bodied people can have trouble negotiating these stairs, especially in bad weather. There is no canopy. There is no handicapped access. Beyond the stairs is a very long platform: the distance from Walnut Street to the shelter where the train stops is 400 feet. It is 700 feet from Harvard Street.

Stairs Down To The Platform



Standing Beside The Train



One doesn't have to be officially disabled to have trouble with this station. Even able-bodied people may experience some vertigo going down and breathlessness climbing up. The station about as far as it could be from providing for the "safety of the young, the elderly, and the mobility impaired."

For those who can manage the 36 steps, there is an additional problem. Will there be a train to take? TOD202 tells us that peak frequency should be 15-30 minutes between trains. Like safety, the frequency standard is very far from our station's reality. Here are the number of minutes between trains for the morning (inbound) rush hour.

Train arrival times	Minutes wait before next train	Meets standard?
6:38 - 7:19	41 minutes	No
7:19 - 7:46	27 minutes	Barely
7:46 - 8:23	37 minutes	No
8:23 - 9:13	50 minutes	No

Non-peak periods of the day are far worse. Here is the complete weekday schedule. Going inbound, *you will wait six hours* if you miss the 1:26 pm train. Coming outbound, there is a *five-hour gap* in the morning. In both directions there are big gaps elsewhere.

Inbound	Outbound
<ul style="list-style-type: none"> • 5:59 – 6:19 am • 6:38 – 6:59 am • 7:19 – 7:38 am • 7:46 – 8:07 am • 8:23 – 8:44 am • 9:13 – 9:34 am • 9:54 – 10:12 am <i>[Flag]</i> • 11:53 – 12:11 pm <i>[Flag]</i> • 1:26 – 1:36 pm <i>[Flag]</i> • 7:37 – 7:55 pm <i>[Flag]</i> • 9:13 – 9:31 pm <i>[Flag]</i> • 12:33 – 12:51 am <i>[Flag]</i> • 1:33 - 1:51 am <i>[Flag]</i> 	<ul style="list-style-type: none"> • 5:00 – 5:19 am <i>[Find conductor]</i> • 10:15 – 10:35 am <i>[Find conductor]</i> • 11:55 – 12:15 am <i>[Find conductor]</i> • 2:00 – 2:20 pm <i>[Find conductor]</i> • 3:40 – 4:00 pm • 4:35 – 4:55 pm • 5:15 – 5:35 pm • 5:50 – 6:11 pm • 6:45 – 7:05 pm • 7:45 – 8:05 pm <i>[Find conductor]</i> • 8:30 – 8:50 pm <i>[Find conductor]</i> • 9:35 – 9:55 pm <i>[Find conductor]</i> • 10:30 – 10:50 pm <i>[Find conductor]</i> • 11:30 – 11:50 pm <i>[Find conductor]</i>

And making the situation even less customer-friendly, over half the trains (colored red) don't even stop at NVC unless you flag them down (inbound) or find a conductor to stop at the station (outbound). Flagging can be difficult and unpleasant. One of the pictures above shows how it feels to stand beside one of these trains. And coming outbound, it's not always easy to find a conductor to stop the train. These trains are long and conductors are few. They can be many cars away. On the outbound trip, people do sometimes miss the station because they couldn't find a conductor in time.

T and Bus Service

Newtonville has no T subway stop. The nearest T Stations are in Newton Centre and Newton Highlands, both some two miles away.

However, we are served by four bus lines. (Information below is for inbound buses. Outbound times are similar.)

- The 59 bus goes north and south, between Watertown Square (north) and Newton Highlands (south). This bus is handy because it cuts across the transportation spokes that go into downtown Boston. However, one has to wait at least 34 minutes between busses. The #59 schedule does not meet the TOD criterion of 30-minute interval or better at peak periods.
- The 556 bus begins in Waltham near Rt. 128, comes to Newton via Moody Street and High Street, continues through Newtonville and Newton Corner, then takes the Mass Pike downtown. It squeaks in to the TOD criterion, having 30-minute intervals during the earlier part of the morning rush hour. But for the rest of the day, the intervals are 60 minutes or more. And most runs do not include all the stops.
- The 554 bus begins in Belmont, curls around through Waltham, then through Newtonville and Newton Corner, and like the 556 takes the Mass Pike downtown. Only one run meets the 30-minute interval criterion.
- The 553 bus starts near Brandeis University in Waltham, curves through Waltham and goes through Newtonville and Newton Corner, then takes the Mass Pike downtown. This line has the most frequent runs of the four bus lines, with times of 25 minutes and 30 minutes in the morning rush hour. However, the rest of the day, the intervals are generally 60 minutes.

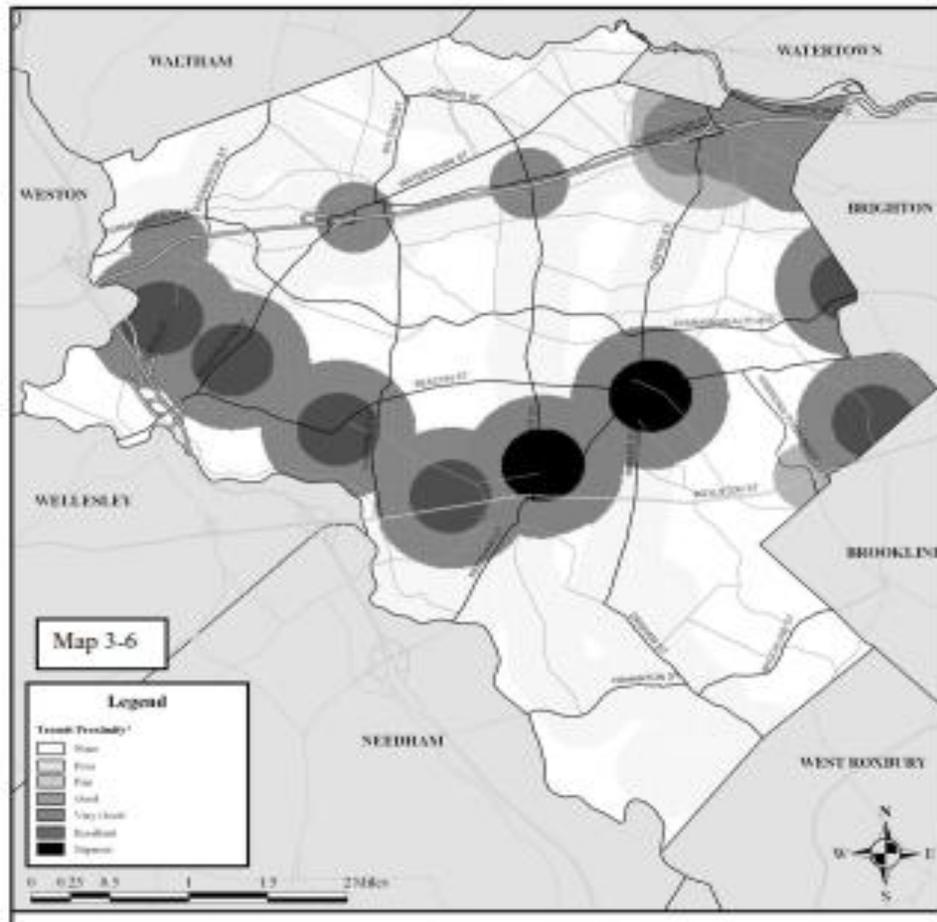
Summarizing the Situation

Service on each of the bus lines is not very frequent, even in rush hours. If we consider all the buses together, plus the commuter rail, a Newtonville resident can get downtown and back in rush hour periods. However, the commuter rail is useless for handicapped or mobility impaired residents, as pointed out earlier. And trips to locations in Waltham, Watertown, and Belmont are not easy to make because the buses run infrequently and the routes do not overlap much. Trips to other towns require transfers.

Newtonville Center is not devoid of public transportation, but it does not meet the requirements of a Transit Neighborhood TOD.

Transit Oriented Development Could Be Better Pursued in Other Villages

Although Newtonville is not suitable for transit-oriented development, there are other villages where true TOD is currently possible. The following figure in Newton's Comprehensive Plan of 2007 (p. 63) shows where in the city concentrations of public transit are located.



The most transit-rich locations are those where the Green Line stops. Newton Centre and Newton Highlands take first honors, but all the other stops are suitable as well. This is because the Riverside Line frequency is well within the 15-30 minute TOD202's guideline.

Weekdays

	First Trip	Rush Hr	Midday	Evening	Late Nite	Last trip
Riverside	4:56am	6 min	8 min	8 min	9 min	12:05am
Govt. Ctr.	5:40am	6 min	8 min	8 min	9 min	12:49am

Weekends

	First Trip	AM Peak	PM Peak	Evening	Late Nite	Last trip
Riverside	4:55am	12 min	8 min	10 min	10 min	12:05am
Govt. Ctr.	5:34am	12 min	8 min	10 min	10 min	12:49am

If you live in walking distance from any of the Riverside Line stations, you will get a train quickly, at any time of the day until closing. And these trains provide many more connections than the Newtonville commuter rail. The Riverside Line stops at 14 locations between Newton and its final destination of Government Center. By contrast, the NVC commuter rail stops at just one station (Back Bay) on the way to its South Station.

A Faulty Assumption: People Won't Need Cars

The developers would have us believe that people who reside in Washington Place will need fewer cars: 1.25 cars per unit versus the zoning ordinance standard of 2 cars per unit. That claim is consistent with TOD's aim of making public transit, walking, and bicycling into attractive alternatives to driving. But is it true that residents of Washington Place would own fewer cars?

People in very transportation-rich places like Manhattan sometimes do dispense with car ownership. In Manhattan, public transportation is cheaper and often more convenient than a car. Many people, even those with plenty of money, may decide that owning a car is just not necessary. When they occasionally need a car, they can rent one.

But Newtonville is no such place. It's true that we have residents who get to work and back during rush hours using the existing rail and bus service. But what happens when these same people want to go to the theatre in the evening? They take a car because public transportation isn't adequate in the evening. What happens when they need to go shopping after work? What do they do when they want to take their kids to school in the morning?

We don't know of any study that has asked Newtonville residents specifically how many cars they own and how they use them. Our experience is that most adults who live in Newtonville own a car unless they just don't have enough money.

We have many examples. Here is one from a post by Karla Heiler on September 8, 2016:

"Currently the T has failed to keep its promise of adding additional 59 bus runs later into the evening. My daughter in law is starting her commute into Simmons for grad school tonight and will also have to drive into school because of lack of T service to Newtonville after 7 pm. Now picture the Court Street development, Austin Street development and the proposed Washington Street development adding to that driving necessity.

"I would like to see the City Council put a moratorium on large scale development of Newtonville until the T and MassDot make Newton a priority for public transportation instead of saying they meet the current guidelines and we're not a priority. (And as far as the Newtonville commuter rail station goes - I'd like to see someone from MassDot get to that platform when they're on crutches."

Most of the residents in the Washington Place development will be paying 'market-rate' rents, meaning they would have the money to own a car and they would in fact do so.

TOD Designation Is Not an Allowed Use in the MU4 Zoning District

In addition to the common-sense observations and the guidelines from *Reconnecting America* and the *Center for Transit-Oriented Development* (presented above), there are statutory reasons why the Orr Block cannot be classified as a transit-oriented development.

Newton Ordinance, Chapter 30, Section 4.2 regulates the Mixed Use Zone Districts. Section 4.2.1 B, provides that *transit-oriented developments are allowed in a Mixed Use 3 Zone District*. But the next section, 4.2.1 C, describes the uses allowed in a Mixed Use 4 District: *A transit-oriented development is not an allowed use in an MU4 Zone*.

It is also interesting to note that Section 4.2. 3 of the Newton Zoning Ordinance requires that a transit-oriented development site must contain *at least nine acres of land*. The Washington Place project contains less than three acres.

While the use of the term *transit-oriented development* may be appealing, it is clearly an error in the developer's petition.

If the Transit Were Adequate, Would Washington Place Contribute Positively as a TOD?

The *TOD Institute* has a certification process for TOD. Although the NBN is not in a position to submit the Washington Place project to them (the price would be \$6500), we can use their eight criteria as a rough guide to evaluating the TOD-worthiness of the project. Keep in mind that this is a “what if” exercise. As things stand now, Washington Place cannot be part of a TOD neighborhood because the transportation isn’t adequate — but suppose it were.

The TOD Institute awards three stars (the highest rating) to entrants who fulfill seven of the eight criteria, two stars for meeting six criteria, one star for meeting five criteria, and no stars for meeting less than five criteria. Here are NBN ratings and rationales:

Criterion	Contribution of Washington Place
<p>1) CLOSE PROXIMITY TO RAIL STATION</p> <p>Ideally, the walk needs to be a <u>high quality, pedestrian-friendly</u> experience. Walking across large parking lots or along a busy 6-lane road with little or no protection from traffic is not an acceptable walking experience, and will discourage walking, even if it’s within the 1/4 to 1/2 mile distance. The walking route needs to be safe, comfortable, and pleasant to encourage widespread walking and bicycling to and from the station.</p>	<p>Can't tell yet</p> <p>People have to cross major streets, but this might be mitigated by good signaling</p>
<p>2) WELL-DEFINED PUBLIC SPACES - OUTDOOR ROOMS</p> <p>Successful public spaces have a sense of enclosure by attractive, human-scaled buildings that wrap a space like walls wrap a room. Active uses line the perimeter activating the space. Together these work as gathering spaces that bring people together. The combination of beautiful architecture with great public space creates exceptional places to live — places that express a life of richness and tradition.</p>	<p>Marginal</p> <p>The space would be wrapped. However, the design allows for little if any uses on the perimeters (very small setbacks) and the architecture is not inspiring.</p>
<p>3) MIX OF USES - LIVELY, VIBRANT PLACES</p> <p>Appropriate mix of uses includes commercial, retail, offices, shops, hotels, residential, institutional, and civic. Ideally, the uses are mixed within each neighborhood, block, and building, and are physically and functionally integrated with direct pedestrian connections.</p>	<p>Can't tell yet</p> <p>What sorts of businesses will go there? Local stores won't be able to afford the rent. Developer needs expensive stores, but would such stores get enough business? There are already empty storefronts in N'ville. The space will be primarily accessible from an internal lot, so it may not connect well with the neighborhood. And parking will be severely limited.</p>

<p>4) PEDESTRIAN SCALE - COMFORTABLE, SAFE, ENJOYABLE</p> <p>Buildings and spaces sized to make humans feel comfortable and safe. A variety of uses in close proximity provides a comfortable balance for people to meet daily needs within a short walk. Uses include grocery stores, cafes, delis, bakeries, newsstands, coffeehouses, personal services, vegetable stands, open-air markets, and public parks and plazas. Project should have a minimum Walk Score of 70.</p>	<p>Can't tell yet</p> <p>N'ville Village Center (NVC) as a whole has a walkability score of 80, according to walkscore.com. However, the specific corner of Washington and Walnut is not highly walkable. The developer promises to change this. We will see.</p>
<p>5) ACTIVE GROUND-FLOOR RETAIL</p> <p>The most successful places have a variety of store sizes with many small shops and narrow store fronts in each block. Larger stores are incorporated by tucking partly behind a line of smaller storefronts, and/or by going up to the second floor. Smaller spaces add more variety to each block and attract the unique, mom & pop type businesses — so important to giving places a unique character.</p>	<p>Probably No</p> <p>Stores will be relatively large, definitely not 'mom and pop.' And as noted elsewhere, the developer has not identified specific tenants.</p>
<p>6) SIDEWALK CAFES</p> <p>Cafe districts create a special ambiance. Outdoor cafes offer front-row seats to some of the best people watching in a city, and encourage people to spend more time socializing and enjoying, and return more often.</p> <p>The more cafes and the larger the total outdoor seating area, the more people the district attracts. Some of the most successful cafe districts have more than 8 blocks of continuous sidewalk cafes totaling hundreds of seats!</p>	<p>Yes, but weakly</p> <p>Cafés will not be on the sidewalk, though that is permissible. But they will not integrate with other cafes to form a continuous line.</p>
<p>7) TREE-LINED STREETS</p> <p>Trees add beauty, grandeur, and a humanizing feeling to streets, spaces and places. The power of trees to add life to a place by providing pedestrian comfort and urban livability is beyond measure. Trees add a unique living, moving element of beauty that complements the architecture while lifting people's spirits.</p> <p>The beneficial psychological healing effects of trees have been well documented. Trees increase property values and retail sales, and slow cars and improve the sense of enclosure of street space with their canopies.</p>	<p>No</p> <p>The project does propose some trees along the street, but not enough to create the kind of pleasant tree-lined street that is meant here. There are too few trees and little setback and the roar of traffic on two busy streets.</p>

<p>8) REDUCED AND HIDDEN PARKING</p> <p>Clustering parking in strategic locations can encourage walking and focus pedestrian activity along important commercial streets.</p> <p>Successful TODs utilize reduced total parking numbers, and incorporate central shared parking between different uses, thereby reducing overall parking numbers further compared to conventional development.</p> <p>Hiding the parking behind buildings, or wrapping parking structures with active uses helps create safe, appealing, walkable places.</p>	<p>No</p> <p>Although the project would have hidden parking, that parking would be insufficient. The net effect would be more traffic congestion and more parking demands on the surrounding streets, making for a negative impact on the TOD goal.</p>
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The final scores: We score one category as Yes and three as No. The remaining three categories don't appear definitively on either side. At this point, we don't believe that the project would earn even one star.

Conclusion

Transit-oriented development is a wonderful concept. Where it is well implemented, TOD is a boon to the community and to the environment.

Can TOD happen in Newton? Yes, in the villages that have Riverside Line stops — though we must never forget that it would have to be executed in a way that preserved and enhanced the unique qualities of each of those village centers. TOD is not a cookie-cutter approach.

For Newtonville, the concept of TOD does not apply. The requisite transit simply isn't there.

Appendix

Shortly before completing this paper, we received the following post from Councilor Jim Cote. It speaks to directly to the difficulty of getting help from the Mass Department of Transportation and the need for the city of Newton to be more demanding when developers talk about "Transit Oriented Development."

Date: Thursday, September 8, 2016 at 11:23 AM

Subject: [WNewton] Public Safety Meeting with Secretary and CEO Stephanie Pollack-One more item

Hi all,

One other item that was addressed last evening with Stephanie Pollack, the Secretary and CEO of Mass DOT was the pedestrian access points to the West Newton and Newtonville Commuter rail stops. Some of the comments made by Stephanie, and the councilors in attendance:

1. Access: The state has met all of the Federal and state guidelines for system access and is not obligated to do more.
2. Newton Access: Having said 1 above, Stephanie understands that we have poor access and limited train service which will have to be addressed through the budget process. None of our stops make the priority list for "must do" next status.
3. Train cost: As they have a commuter rail services contract, Mass DOT knows exactly what it will cost to add trains, but there is no established need for more paying customers at this point.
4. Transit oriented development: Mass DOT is aware that the current service is not suitable for this type of development, but see above.
5. Partnerships: This is an area in which the Secretary seemed to throw the ball in our court. She noted cases (New Casino), wherein Mass DOT and either of a municipality, or a developer assists in financing new commuter projects. In our case, in Newton, as Councilors we have to be vigilant in projects such as Austin St, the Orr Building, Court St, etc in seeing that the Developers financially assist in this area that so greatly benefits their projects. We can talk Transit Oriented Development, and the developer can talk it, but unless we pursue ways to finance the trains this concept cannot work. As a City Councilor I can assure you that we can do better here.

Dimensional Requirements and Parking Waivers for the Orr Project

Letter to the Land Use Committee

Naomi Myrvaagnes

November 28, 2016

Dear Mr. Laredo,

I am writing to comment on, and oppose strongly, the developer's requested parking stall design waivers for the Orr project listed in the Land Use Committee report of November 1, 2016. Please forward this to the other members of the Land Use Committee.

The developer requests waiving dimensional requirements for the stalls and also for end-stall maneuvering space in the parking facility. As I read the document, both resident parking and hourly parking would be affected.

Such requests are common, of course, for any development seeking to maximize profit and squeeze the most out of available "floor area" in cramped land situations.

In a development such as this (and Austin Street, too), there will be a lot of in-and-out, "hourly" traffic during the day, as well as commuters trying to enter or exit their resident spaces during two narrow time periods daily.

What this means in practice is that granting the waivers to shrink the usable space for each car and each maneuver will be very counter-productive to the goal of accommodating the needs of the maximum number of people. Why? Because when the spaces are too small, the following negative consequences occur, and the effective number of usable spaces is actually REDUCED:

1. Many drivers park carelessly, over the line, and thus occupy two spaces. There are never negative consequences to them for this behavior. But drivers circling to find a vacant space are wasting time and get, justifiably, angry. Erratic driving and accidents can ensue. If they are trying to park in order to shop, they'll be forced out of the garage and will shop elsewhere. They will learn quickly to avoid the problem garage.

The net effect of shrinking the spaces is to DECREASE the number of actual spaces available. The spaces now deemed adequately wide by planners is unrealistically narrow for the SUVs and other large vehicles in common use.

2. Drivers can't get themselves out of their cars because the spaces are too narrow. They certainly can't get their small children out of their car seats or elderly passengers out of the car. They will shop elsewhere.

3. The care required to maneuver in undersized tenant garage areas wastes everyone's time and leads to accidents. Elderly people especially, a target tenancy for the Orr project, have trouble with cramped parking situations. And the millennials, the other target population, are not known for patience.

Points 1 and 2 apply mostly to hourly parkers. Point 3 applies mostly to residents using the garage.

If the goal of design is to serve the needs of users, then fewer but adequate spaces are the way to go, in my opinion. If this limits the size of the development, so be it.

The result of not considering the actual effects of the numbers is long-lasting inadequacy.

I hope that you will instruct the planning people to consider this reality in their recommendations.

Sincerely,

Naomi Myrvaagnes
Newton 02459

IT JUST DOESN'T FIT: WASHINGTON PLACE'S IMPACT ON NEWTONVILLE'S PARKING AND COMMERCE

Peter G. Bruce, Ph.D. September 2016

Preface

Much of the research cited in this article was done in 2014 and 2015, at the time when the Austin Street Project (*28 Austin Street*) was being planned for development. Three different parking consultants were hired by the city during that time, and I conducted my own independent study to find out what parking conditions prevailed in Newtonville, and what the effect of development was likely to be.

My focus in this paper is the Orr Block development. But my earlier research is, with a few exceptions, equally as applicable to the Orr Block Project (*Washington Place*) as it was to the Austin Street Project. That is because the existing capacity of Newtonville's metered parking system remains the same, no matter what development is contemplated. The findings of my study and parts of the others provide recent and reliable understanding of our parking system usage. [Note: I will sometimes refer to the Austin Street Project as ASP and the Austin Street Lot as ASL.]

If we are going to adopt a policy to attract more shoppers and visitors into Newton, we need a plan to manage their coming and going. A developer's statement that they will mostly come and go by bus, commuter rail, or bicycle is not realistic. A major part of a better plan needs normative criteria by which to judge the efficiency of parking systems and their ability to facilitate commerce and handle extra stress. Other communities use such criteria, even though the practice was, to a large extent, dropped by the City's second and third parking consultants on the Austin Street Project. These criteria need to be re-established.

Let's turn now to Newtonville and the Orr Block Project.

Parking is essential for local business



As Councilor Danberg has asserted, “Parking is the lifeblood of our businesses.” In Newtonville, this idea was endorsed by the owners of 34 local businesses who signed a **petition** against the Austin Street Project, due largely to its anticipated bad parking impacts.¹

It was also confirmed by a 2014 Newtonville Area Council survey of 777 residents. These residents' primary concerns (top two out of seven) regarding the Austin Street Project were the loss of parking (69%) and additional vehicular traffic from new residential units and retailers (55%). (see Figure 1 on p. 7.)²

The Orr project does not stand alone. Newtonville has now been targeted by three major developments (Court Street, Austin Street, and Orr Block) which, if

built to their proposed size, will add about 275 new units and 700 residents within a half-mile of each other, assuming Newton’s average of 2.5 persons per household. How will that affect our parking and commerce?

Newtonville’s **metered** public parking system is **especially important to commerce**. GPI, Newton’s first parking consultant noted this.³ Metered spaces are closest to businesses and key to customer convenience, and thus keeping the blood of commerce flowing. For this analysis, we’ll **use the same 6 zones** as GPI, and focus especially on Newtonville’s approximately **300 metered spaces** as the heart of our public parking system. Data are drawn from GPI’s study in 2014, and from my replication study a year later. (For a map of metered parking, see Figure 2 on page 8).⁴

How to measure if the parking system is adequate

To test a parking system’s health, and whether it is can serve the drivers who want to park there, we use the 85% rule. **85% of capacity is the level beyond which a parking system becomes overcapacity** according to top academics and the Institute of Traffic Engineers.⁵ **This is the industry standard**, and GPI’s.⁶ It’s the point at which people have to start circling for parking. Up to 85%, more parking is good for business. Beyond that, people become dis-incentivized to come to the area — they start to avoid it. Some may resolve to never come back.

What we've been told by Newton's first parking consultant

In its Executive Summary and on the first page of its report, GPI had headlined its finding that Newtonville's parking system was generally functional, according to the 85% rule.⁷ After residents experienced great difficulty parking in Newtonville's metered parking in winter 2014-2015, the *Tab* published my article, "Parking Jams in Newton's Austin Street Lot," which showed, contrary to GPI, parking often exceeded 85% during the colder months.⁸ Following that article, the Administration switched to Nelson/Nygaard as its traffic and parking consultant.

Nelson/Nygaard's brief study, submitted to the Planning Department in May 2015, was largely derivative of GPI's, whose data it cherry-picked.⁹ It totally ignored the 85% rule and issues of how functional Newtonville's metered parking system was. So, too, did Planning Horizons, when that firm, the City's third parking consultant for the ASP, reported parking counts for two weekdays and a Saturday in mid-October 2015. It failed to note that of the days they observed, one of them had an overcapacity reading (112), another day was right on the 85% cusp (107), and the third was just a little below it (102).¹⁰ They also failed to note, in the context of the Planning Department data I drew on, that these mostly weekday peak readings were all higher than the average peak Saturday readings for fall in previous years.¹¹ This suggests that parking demand was increasing and becoming less functional from year to year. (Their October data were almost identical to what I found for the ASL seven months earlier, suggesting that these findings can be generalized to fall and spring, i.e., seasons which are not unusually congested, like mid-winter, or lightly used, like summer.)¹²

Likewise, reviewing that latest planning study, Alan Schlesinger, ASP's attorney, asserted that no more than 112 of the 127 future spaces, or 88%, had been filled, and that this was only 70% of the existing total of 159.¹³ He failed to note that his figures broke the 85% rule. He also, importantly, failed to point out that the total of 159 existing spaces was temporary, since 32 or more of them would be eliminated by the project. Instead, he asserted "the current parking lot is frankly dreadful," and suggested plenty of parking would be available if the project were built.¹⁴

Our analysis

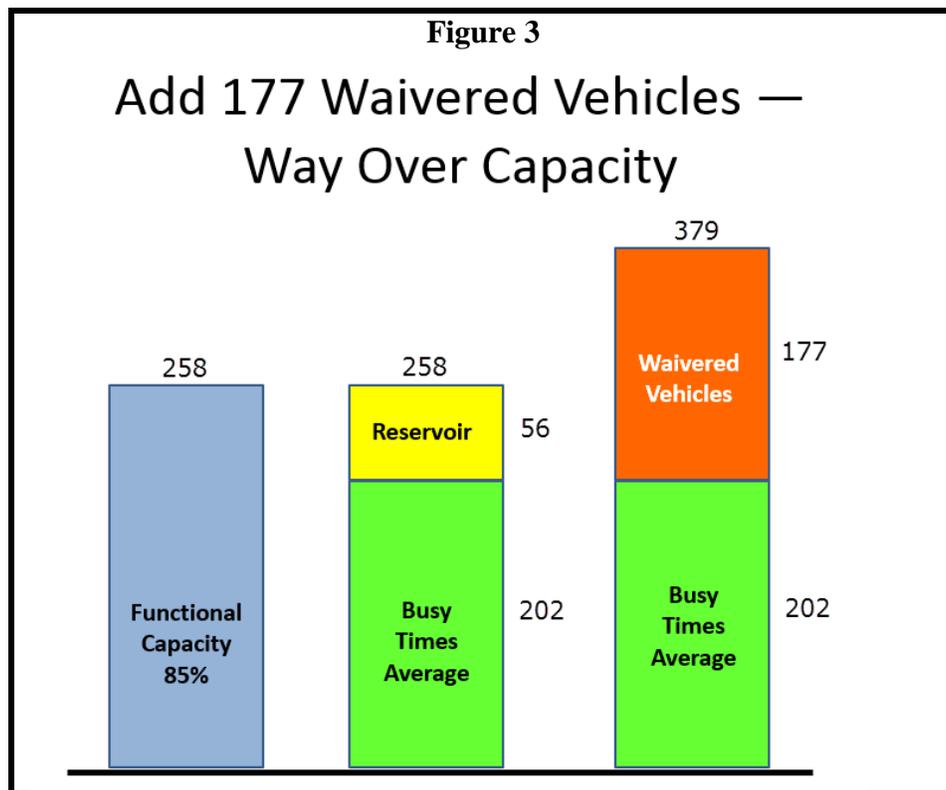
Descending into this sort of normless analysis and losing the practical wisdom of the 85% rule only makes it more likely that the blood flow of our businesses will be choked off if we don't think anew about what's best for our parking systems.

Keeping the 85% rule in mind, along with other standards embodied in the Zoning Ordinance, it seems as if Washington Place, as well as the other big new developments in Newtonville, could undermine local commerce if it is allowed to go to maximum size and avoid the requirements of the law. Here's why.

As noted, several studies have shown that during the busiest hours on Saturdays the system is usually overcapacity, especially in the coldest half of the year.¹⁵ Some people, mainly proponents

of large-scale development, argue that these are rare times of inconvenience that people should simply put up with. Even granting that point for the sake of argument, if we look at the five hours of highest usage every weekday and Saturday, the prognosis is still bleak.

So to assess the health of our parking system and how much added stress it can absorb, let’s look at more typical “busy times,” in our village, that is, the 30 busiest hours during weekdays and Saturdays. Based on GPI’s research and my own, Newtonville’s metered parking system has a functional capacity of 258 spaces, which is 85% of its full capacity of 303 total spaces¹⁶ (see Figure 3, left bar). The system can withstand 56 more vehicles during “busy times” before becoming overcapacity (Figure 3 again: the reservoir is the top of the middle bar).¹⁷



But the developers of Austin St. and Washington Place have requested waivers (80 for Austin Street and 97 for Washington Place) giving them permission to ***not*** create 177 spaces.¹⁸ That means **177 more vehicles looking for parking – 3.2 times** what our reservoir could functionally accommodate. (“Waivered Vehicles” at top of right bar is 3.2 times the reservoir.)

Newton Centre, with its waiving of requirements for numerous parking stalls, already appears to have such a dysfunctional system that frustrates many potential customers.¹⁹ **Constraining the size of Washington Place within current zoning would mitigate this problem in Newtonville.**

As for Washington Place’s new parking demand, some experts have claimed that Washington Street’s metered parking zone will handle it. Indeed, GPI noted that apart from the ASL, which has since had its excess capacity largely filled by Star Market’s closing its lot to “public

parkers,” Washington Street has the largest reservoir of surplus capacity in Newtonville’s public parking system. But that area is already almost two-thirds full in “busy times,”²⁰ and can only handle another 20 or so additional vehicles before becoming overcapacity. Parkers exiting and entering in rush hours will further congest traffic around the Washington/Walnut Street intersection, recently graded “D” by an impartial agency.²¹ That’s little better than a “rolling parking lot.”²²

Dubious assumptions

As noted, by requesting waivers for 177 parking stalls for these projects, developers are asking permission to avoid providing spaces they would otherwise have to provide. They argue these parking waivers will not create serious problems; however their argument is based on the following **dubious assumptions**:

- 1) That residents at Washington Place (like Austin Street) will need only 1.25 vehicles.²³ Usually Newton households need two or more.²⁴ And with renters, especially Millennial roommates, often doubling, tripling, or quadrupling up to save money, this is not likely to change, given the inadequacy of transit in Newtonville. Furthermore, if Washington Place’s residents are only allowed one space, and can’t park another vehicle on the street in cold weather months when overnight parking is banned, they will likely park their second vehicle elsewhere in cold season, and then bring them back to park on Newtonville streets or in the ASL in months when the ban is lifted.
- 2) That flooding Newtonville with more vehicles for which there is inadequate metered or developer-provided parking will not intensify and worsen parking congestion on side streets.
- 3) That Newtonville has great mass transit. Walkscore.com gives it a 36, the third worst score in Newton.²⁵ The MBTA provides very little service inbound after 1:26 pm — including one stretch of six hours without a single train.²⁶ Newton emphatically does not have great public transit, and we cannot expect help from the MBTA or the Commonwealth in the foreseeable future. For details, see the presentation on Transit Oriented Development.
- 4) That resident and customer vehicles will gladly park in smaller spaces, sometimes a foot shorter than the parking section in our Zoning Ordinance requires.²⁷
- 5) That people won’t mind parking in lots with less room for maneuver than required by our Zoning Ordinances.²⁸
- 6) That they also won’t mind not having the interior landscaping, lighting, setbacks, bollards, wheel stops, guard rails, and curbing that are normally required by our ordinances to enhance our parking lots’ aesthetic appeal and safety.

- 7) That the new businesses accompanying new developments won't generate many more customers than anticipated. They could. And this, along with other parking problems, could squeeze out customers for existing businesses.
- 8) And that their new employees won't park in public metered parking. When people are likely to be late or have things to carry, they often cut corners and park in whatever space is most convenient, even if they're not supposed to. That includes employees.

Since these assumptions are largely false, Newtonville's parking system will frequently be overcapacity, and scare away business and customers.

Conclusion

It could be self-defeating for a developer to make outsized buildings that could choke off parking and access to his own commercial space. But developer-owners may want to build large to sell a property soon after it has been built, or even before it is finished, for a higher profit. In that case, the social costs of a dysfunctional parking system would be shifted onto the community.

If we brush aside the practical wisdom in our Zoning Ordinance and the 85% rule, we'll choke our local commerce's "blood flow," and sentence many local businesses to death. These losses will be added to the suffering of those residents and businesses already displaced by the original purchase. Likewise, the many local businesses displaced by the original purchase will likely be replaced by bland, undistinguished national and regional chain stores – the only stores that can afford the much higher rents. Is that good for Newtonville's remaining businesses? For Newtonville's distinctive atmosphere?

To reduce the risk of a commercial heart attack, we request that the City Council refuse to re-zone the Orr Block properties.

Chart and Notes

Further details about how the study was conducted are available upon request. Contact me at

Peter G. Bruce
pgbrb@rcn.com

This figure referenced on page 2 of this report

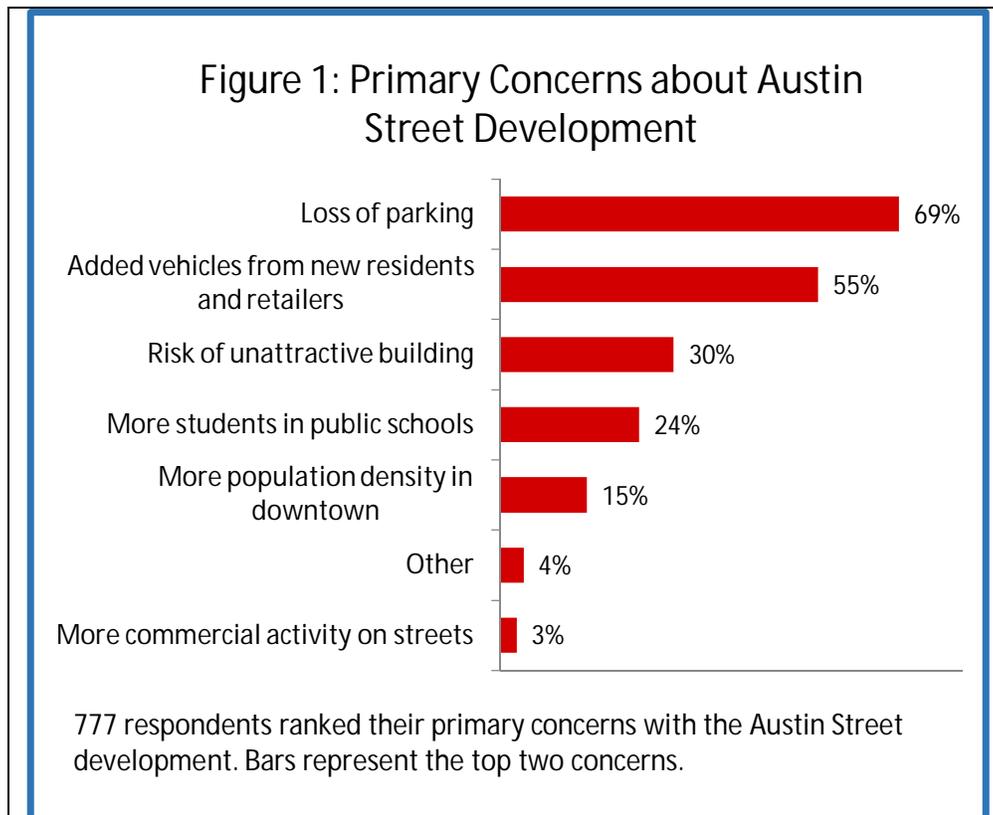


Figure 2: Newtonville's Metered Public Parking System — from GPI study



¹ “Businesses sign petition against Austin Street Project,” Jonathan Dame, *Newton Tab*, 10/16/2015.

² “Austin Street Development Public Survey,” Newtonville Area Council, March 4, 2014, p.4.

³ Greenman, Pedersen, Inc. *Parking and Traffic Engineering Study: Village of Newtonville*. July 2014. Submitted to the Planning Department, Newton City Hall. See pp. 2, 29.

⁴ *Ibid.* Map on unnumbered introductory page.

⁵ *Ibid.* See Executive Summary and p. 8. For an academic perspective, see See Donald Shoup, *The High Cost of Free Parking*. Chicago: Planners Press, 2005, Chapters 11-13.

⁶ *Op. Cit.* pp 8 and 33. See also *Parking Generation Handbook, 4th Edition*; Institute of Transportation Engineers (ITE); 2010. And *Trip Generation Handbook, 2nd Edition*; Institute of Transportation Engineers (ITE); June 2004.

⁷ *Op. Cit.* GPI “Executive Summary,” and p. 1.

⁸ “*Commentary: Parking jams in Newton’s Austin Street lot;*” Peter Bruce, *Newton Tab*; posted online 2/27/15. It was also published in the paper.

⁹ “*Memorandum: 28 Austin Street – Transportation Impact Study;*” Nelson/Nygaard Consulting Associates, Inc. Submitted to Austin Street Partners and the City of Newton. This memo was “Attachment A “of a document submitted to the Land Use Committee dated May 12, 2015. See especially p. 22. “Existing Parking Supply and Utilization.”

¹⁰ Memo to the Land Use Committee, “28 Austin Street, Newtonville Square, Mixed Use Development,” addressing parking in the Austin Street Lot. Lou Mercuri, Planning Horizons, Weston, Ma. 10/19/2015. Submitted as Attachment H with Austin Street Partners submission to the Land Use Committee “Austin Street is a great project,” 10/23/2015.

¹¹ Peter Bruce, “Newtonville’s Parking Needs and the Austin Street Project.” Report submitted to Newton’s Board of Aldermen, May 2015. See Charts 1 and 2, p. 2.

¹² *Ibid. Op. Cit.* Mercuri, Planning Horizons, pp. 3-4.

¹³ Alan Schlesinger, testimony before Land Use Committee, 10/29/15. On audiotape available on LUC website, minutes 9-12.

¹⁴ *Ibid.*

¹⁵ *Op. Cit.* GPI, p. 12. Even GPI’s data show this, especially if its parking counts for 3/22/14, a day representing half of GPI’s peak-hour Saturday data for that month, which it rejected as an outlier, are retained. As I argued in “Newtonville’s Parking Needs...,”(pp. 1-2) that data should be retained as valid, since it is consistent with other cold weather counts available in Newton’s Planning Department that GPI neglected.

¹⁶ 295 metered spaces, plus 8 handicapped stalls located amidst them. *Ibid.* GPI, pp. 9 and 29.

¹⁷ 205 is an average of GPI’s 2015 hourly average (203 vehicles) and my own (207 vehicles) for 2015, for “busy times.” These times are 10 am to 2 pm, and 5 pm to 7 pm every weekday. See Bruce, “Newtonville’s Parking Needs...” Appendix, and its Tables.

¹⁸ See Austin Street Board Order, and Washington Place Special Permit Application.

¹⁹ Nelson/Nygaard, “Newton Centre Parking Strategy Draft 2.”
<https://www.hightail.com/download/ZWJXWmdwTIE0b0JMWE5Vag>

²⁰ *Op. Cit.* GPI, p. 29.

²¹ “Technical Memorandum: Washington Street Sub-regional Priority Roadway Study in Newton.” Chen-Yuan Wang. Boston Region Metropolitan Planning Organization. 1/22/15.

²² Discussion with former Department of Transportation traffic expert Ron Mauri. 7/12/16.

²³ “Zoning Review Memorandum.” City of Newton, Department of Planning and Development. 5/12/16. P. 4.

²⁴ See, for instance, <http://datausa.io/profile/geo/newton-ma/> and <http://www.clrsearch.com/Newton-Demographics/MA/Number-of-Vehicles-per-Household>.

²⁵ See: <https://www.walkscore.com/MA/Newton>

²⁶ See: http://www.mbta.com/schedules_and_maps/rail/lines/?route=WORCSTER

²⁷ *Op. Cit.* City of Newton, “Zoning Review Memorandum,” p.5.

²⁸ *Ibid.*

Critique of the VHB Traffic Study
Prepared by *Neighbors for a Better Newtonville*

Contributors

Ron Mauri, Transportation Economist ABD, Volpe National Transportation Systems Center
Adel Foz, MCP/M.Arch MIT
Peter F. Harrington
Fred Arnstein, Ph.D., Principal: Survey Action Associates

Background

The developer has provided you with a traffic study from the project team prepared by Vanasse Hangan Brustlin (VHB).

The VHB study would have you believe that the Washington Place (Orr Block) project will have minimal impact on nearby traffic and that proposed improvements will mitigate such any such impacts. It also claims that safety will be improved.

Our original response to the VHB report has been critiqued by VHB and we have accepted some of their feedback. So this report is shorter than a previous version. But some of our criticisms remain and we still contend that the study is flawed and the conclusions cannot be trusted.

Below, we will point out several of the failings of the report. But to be clear on the main point: If the developer's petitions are contingent on the idea that the project does not make traffic worse, then this project is not convincing.

We hope the Land Use Committee and the full City Council will acknowledge that the VHB report is inadequate, and that the impact of Washington Place as proposed is likely to be negative. We hope it will consider this in deciding to reject the Washington Street petitions.

The overall picture is that large developments, both commercial and residential, do increase traffic, and this is a current and future problem for Newton. Newton's streets are for the most part already built out. Their capacity cannot be increased and in some places is already being reduced by bike lanes & pedestrian bump outs.

Witness the regular Rt. 9 traffic jam every afternoon at 3 PM from Parker St. to Elliott St. (0.9 miles) or Needham St. every afternoon. A single project may have modest negative impact, but the cumulative result of multiple projects — in terms of wasted energy and air pollution, not to mention daily aggravation — is very substantial. We fear that this could be the fate of the whole Washington Street corridor.

VHB'S ASSUMPTIONS AND PROCEDURES

Statistically invalid foundation: VHB's one-day data collection

The measurement of traffic volumes is the foundation of the analysis. Here, VHB has failed to generate convincing data. Both common sense and statistical theory conclude that their method can be taken seriously. Quoting their report, they collected data "based on automatic traffic recorder counts conducted on November 19, 2015." In other words, they collected data for one single day.

It does not require statistical expertise to grasp the essence of statistical sampling. Most every type of phenomenon involves variability from one instance to the next. For any process that exhibits variability, a sample of one makes no sense. Hitting a baseball is a process with variability: some days you hit, other days you don't.

What is David Ortiz' batting average? — observe a single game?!

Traffic flow is variable. It differs from day to day in a seemingly random fashion, and it varies more predictably depending on seasons, holidays, weather conditions, and special events. Furthermore, as we learned from the Austin St. case, the Newtonville village center commercial area is often clogged during non-rush hours and on weekends. So those periods should have been emphasized as well.

The VHB report abandons site-specific data when it comes to seasonal variations (bottom of p.8 of VHB report).¹ The report thus makes an unsubstantiated assumption that Newton patterns are identical to the average of other communities in the state. Do we believe that winter and summer traffic patterns around Fenway Park are the same as those in Newton? Or similar to those in the Berkshires during leaf-peeping season?

For those who say that VHB conducted the study according to industry standards — that one day's observation is enough — we say that such a standard is not credible. It flies in the face of statistical theory and common sense.

¹ References to tables, etc. refer to the VHB report. In some cases, we have reproduced those tables in this presentation, keeping the original table numbers. We do also have several tables that we created, derived from tables in the VHB report. We have made it clear that these are derivative.

Critical street segments were not included

VHB chose to study only two street segments (see Table 1, p. 8 VHB). These are the segments on the Orr Block's exterior faces: (a) Washington west of Walnut and (b) Walnut north of Washington. While these segments are relevant to traffic entering and exiting the project, they are less relevant to overall traffic volume impacts. This is because they have lower volumes than the alternatives indicated by the turning data in the Appendix.

Specifically, (a) Washington St. EAST of Walnut gets the cumulative effects of funneling three flows (from Washington St. west of Walnut, plus the north-bound and south-bound Walnut St. flows) heading to and from Boston via the Mass Pike entrance at Newton Corner. (b) NNHS is located south of Washington St. and is a major traffic generator twice a day, including the morning peak rush hour. (c) The Walnut St./Watertown St. intersection can become very clogged and so influence congestion on Walnut Street heading toward Washington Street. Thus areas with high impacts are not included in the analysis, e.g., the estimated LOS ["Level of Service," explained below] and delay measures.

Impact of Austin Street simultaneous construction not considered

A 68-unit building has been approved by the city for 28 Austin Street. This location is a mere 0.2 mile from the Washington Place site, a 3-minute walk using Walnut Street (we have timed it). The VHB report mentions the possibility that Austin Street, and several other projects, might adversely affect traffic. But VHB concludes (p. 15) that the impact will be negligible: "their site-related trips are not expected to affect our study area."

There are two problems here. First, given the problems we see in the Washington Place traffic study, one has to wonder whether the Austin Street study was similarly unconvincing. Independent research by Peter Bruce contends that that Austin Street, when completed, will have more impact on parking than the official study shows. It's reasonable to suspect that traffic congestion will also be worse.

Second, and not at all speculative, is the problem of overlapping construction periods. These two projects, so near each other, are very likely going to be built at the same time, or partially so. There is no doubt that traffic will be adversely affected during each of the construction periods. When the construction periods overlap, traffic disruptions are likely to be quite severe. Leaving out this issue we consider a serious flaw in the VHB report.

Some of the existing trips will remain post-construction

A primary factor in assessing the project's traffic impacts are the estimated changes in the number of vehicle trips. (See Table 3 for the peak A.M. and P.M hours).

The methodology offsets new trips by assuming that all existing trips disappear. While this may be true for the Washington Place site itself, it is wrong to assume that the trips will simply disappear from Newtonville or the rest of Newton. Existing trips to and from the site are made for specific purposes. These purposes do not end when the existing buildings are demolished and their users relocate. Rather, they simply shift to other locations. Simply stated, a meal at Karoun's, or the need for camera repair at NV camera, or studio dance lessons are not obliterated by a wrecking ball. So those trips still exist, and some will probably be on the same Newton streets as before.

So while the study method might be valid in its estimate of vehicles entering and exiting the specific site, it is not valid to subtract all the existing trips from the number of vehicles passing by the site and contributing to congestion on Washington, Walnut and other area streets. Thus the project traffic impacts are understated.

"Transit-oriented Development" concept is irrelevant

The VHB report says (p. 9) that "It should be understood that the proposed redevelopment is a Transit-Oriented Development (TOD)." Similarly the report says (p. 1), "VHB, Inc. has completed a detailed traffic assessment to evaluate the potential impacts associated with the mixed use transit oriented redevelopment know as Washington Place... "

We have explained rather extensively in other presentations (e.g., *Transit-Oriented Development: Why It Does Not Apply to the Washington Place Proposal*) why Washington Place does not qualify as a transit-oriented development. The most fundamental reason is that public transit capabilities in the Newtonville Village Center do not meet the minimum requirements for a 'Transit Neighborhood' which is the most modest type of transit-oriented place.

VHB'S CONCLUSIONS

Traffic is already congested

Here's how the professional transportation community evaluates and characterizes traffic flow. Highways and signalized intersections are rated for traffic congestion using Level of Service (LOS) grades from "A" to "F." The computations are complex, taking account of a variety of factors, but the general idea of the ratings is easy to understand.

- "A" indicates free traffic flow at the speed limit
- "F" is the worst rating, characterized by a breakdown in traffic flow, more demand than capacity, and a constant traffic jam.

Here are descriptions of the three lowest grades, as they apply to signalized intersections.

Level of Service	Description
D	Significant congestion on critical approaches, but intersection functional. Cars required to wait through more than one cycle during short peaks. No long-standing queues formed. This is a reasonable goal for urban streets during peak hours.
E	Sluggish and frustrating. Severe congestion with some long-standing queues on critical approaches. Intersection can be blocked if traffic signal does not provide for protected turning movements. Any disruption may create shockwaves in upstream traffic.
F	Total breakdown in flow, jammed-up stop-and-go traffic. The wait at the intersection is at least 80 seconds; it's more likely to be two minutes or more.

With these Level Of Service (LOS) definitions in mind let's focus on the main intersection – Washington @ Walnut. Table 9 in VHB's report tells us the overall condition is "E" in the morning and "F" in the afternoon. When you look at the various flows – east, west, north, south, and thru, right and left — you find almost half (21 of 48) are already at a grade of LOS "F." One-third of the specific flows are considerably worse than the 80-second "F" minimum delay time.

So, according to VHB's own data, this area is not appropriate for further development and added vehicle traffic.

The project would increase traffic, make Level of Service worse

How will the added trips affect LOS? Again looking at Table 9, you will find that the morning peak changes from LOS "E" to "F" (the worst). The afternoon peak, already at "F," is likely to become even worse. (VHB points out that there is currently a well-attended Ballet School on the Orr Block. It will move away. So added traffic in the evening will be offset by lack of traffic at the Ballet School. Their point is well taken as a possibility, but given their inadequate data collect — see the beginning of this paper — we are not convinced.)

Bump outs disrupt traffic flow

VHB proposes curb extensions ("bump outs") to make the intersection safer. What the reports fail to mention is that bump outs can also slow traffic, so the LOS estimates will be worse, not better. VHB has pointed out that bump outs can be at the ends of parking lanes which in theory would not allow for a turning lane anyway. But that depends on where the parking ends. If parking end before the intersection, then the end of the parking lane becomes a turning lane. But with a bump out at the corner, that opportunity is not longer available.

We are not saying that bump outs are a bad idea. But if bump outs and other such changes are good ideas, they should be built into the base case (no build). Newton should consider doing them regardless of whether and when a project is built. And if they are done, then the downside (impeding traffic flow) has to be taken into consideration.

New signals and signal timing won't help at congested times

New signals and timing will probably help in off-peak non-congested periods, but not at peak periods when most trips and traffic congestion occurs. A minute will always be 60 seconds and the typical flow rate is about 30 vehicles per lane. When demand exceeds capacity, the queues just get longer until demand drops.

We would also bring to your attention two other very relevant considerations. First, the Metropolitan Planning Organization (MPO) study of the corridor actually recommends that the exclusive pedestrian signal phases at both intersections be increased – again making the already congested intersections worse.

Second, the MPO study also notes that the introduction of new turnpike tolling in Newton will considerably increase the baseline traffic flows on Washington Street from those assumed by the consultants. This happened on October 28. It could have a significant impact on traffic and needs to be taken into account.

A dense project will jeopardize the City's Comprehensive Plan for the Washington Street Corridor

The roadway between Walnut and Lowell Streets is the shortest signalized stretch of Washington Street between Newton Corner and West Newton. On a daily basis, it already shows limited capacity to store vehicles waiting for signals and often operates at Level of Service E/F. Causing these two intersections and their approaches to operate longer at these Levels of Service and worse will discourage investment in the future development of the corridor, as proposed by the City.

In addition, Walnut Street is the only major North-South roadway between Newton Corner and West Newton. Significant delays to traffic between Walnut and Lowell on Washington will cause diversions onto other City streets which are not designed to provide relief capacity or to provide comparable East-West and North-South connections.

In conclusion

We are skeptical of the rosy picture portrayed by the VHB consultants. The Washington Place petition for rezoning and waivers is likely to create traffic problems that will affect the immediate area and may add to congestion in other parts of the city. The VHB report, in its current state, does not prove the contrary. A smaller development (within current zoning) may add to traffic, but less so than the large MU4 complex that is proposed.