

April 8, 2019

via email

Councilors Gregory Schwartz, Richard Lipof, Maria Greenberg, Jacob Auchincloss, Andrea Kelly, Christopher Markiewicz, Deborah Crossley, and Marc Laredo

Land Use Committee
Newton City Hall
1000 Commonwealth Avenue
Newton, MA 02459

Re: Petitions #425-18 & 426-18

PARKING

Dear Councilors Schwartz, Lipof, Greenberg, Auchincloss, Kelly, Markiewicz, Crossley, and Laredo,

Northland's parking analysis is based on faulty data and incorrect assumptions and severely underestimates the number of parking spaces that will be required for the proposed development. If the required parking is not provided on site, vehicles related to the development will overcrowd narrow neighborhood streets, creating safety concerns.

Northland uses the MBTA/MassDOT TOD guidelines¹ for the number of parking spaces required for residential unit and per square foot of commercial and retail space. The guidelines are a statement by the MBTA and MassDOT's "about how they **hope** to see transit-oriented development (TOD) planned and implemented around MBTA rail and bus stations." (emphasis supplied) However, as Newton's Planning Department makes clear in its memo dated April 5, 2019,² "The Northland Newton project suffers from the first/last mile problem that arises when potential transit riders are located more than a comfortable walking distance from transit." In fact, Northland's proposed development is 1.2 miles away from the nearest MBTA stop (Newton Highlands). The guidelines used are, therefore, inappropriate to the proposed development and will underestimate the number of needed parking spaces.

As with its traffic study, Northland bases its estimate of the number of required parking spaces on its "Robust Shuttle" mode split, which assumes that only 60% of trips will be vehicular for office employee use³ and uses this assumption to argue for reduced parking ratios. However, in its response to BETA's

¹ Available at https://www.mass.gov/files/documents/2017/10/17/TOD_Policy.pdf

² Available at: <http://www.newtonma.gov/civicax/filebank/documents/96257>

³ See page 3 of VHB's Memorandum, dated March 27, 2019 available at:
<http://www.newtonma.gov/civicax/filebank/documents/96177>

peer review of its transportation proposal,⁴ that “there is not good data that we are aware of that fully support the percentages outlined” and that even under best conditions, “the reality is that the actual is likely to be something in-between the existing and that represented under the Robust Shuttle scenario.”⁵ Further, Northland makes it clear that “no data exists regarding projected percentage [public transportation] ridership gain.”⁶ It is, therefore, inappropriate to use 60% as the percentage of traffic that will be vehicular and the existing conditions (88%)⁷ should be used instead.

Northland’s parking proposal is highly suspect in other regards, since it is based on inaccurate estimates provided elsewhere in its proposal, incorrect math, and even a lack of common sense. In its memorandum revising the proposed development, dated February 13, 2019,⁸ Northland estimates that 776 total cars⁹ will belong to residents of the proposed development. Northland’s latest Summary of Economic Impact Analysis, dated February 8, 2019,¹⁰ anticipates there will be 1,346 employees at the site.¹¹ Using the current mode-split, 88% of the employees can be expected to drive to the site, requiring 1,185 spaces. Combined with the spaces required for residential use, the minimum number of spaces required is 1,960.

Even using Northland’s unsupported claim that only 60% of the traffic at the site will be vehicular traffic, the minimum number of spaces required for residents and employees would be 1,584. However, Northland’s latest proposal calls for only 1,550 total parking spaces, which is fewer than the number of spaces required based on the number of cars owned by residents and employees that can be expected to commute to the site by car.

Yet, the minimum number of required parking spaces is actually larger. There also will be a need for retail customer parking, which will be substantial,¹² as Northland states in its letter dated December 5, 2018,¹³ that it expects the “customer radius is more than a 5 minute drive.” And, additional parking will also be needed for short and long-term visitors to residents, and users of the community spaces and open space.

⁴ VHB Memorandum, dated February 12, 2019, available at:

<http://www.newtonma.gov/civicax/filebank/documents/95502>

⁵ Id; response to comment #2.21

⁶ Id; response to comment #7.18

⁷ See Table 6 on page 56 of Northland’s Transportation Impact and Access Study, dated October 2018, available at:

<http://www.newtonma.gov/civicax/filebank/documents/92313>

⁸ Available at: <http://www.newtonma.gov/civicax/filebank/documents/95733>

⁹ While we think it is illogical to assume that an 800-unit development, half of which are 2 and 3-bedroom units will average less than 1 car per unit, we nevertheless will use Northland’s low estimate to demonstrate that the parking plan does not work even with this artificially low estimate.

¹⁰ Available at: <http://www.newtonma.gov/civicax/filebank/documents/95496>

¹¹ 977 office employees, 345 retail employees, 24 residential-related employees.

¹² For example, the Newton Nexus, which due to its adjacency to the Avalon Newton Highlands 294-unit residential complex is a good model for a mixed-use development provides 518 parking spaces for 130,000 square feet of retail/commercial space (which is comparable to the 115,000 square feet proposed by Northland).

¹³ Available at: <http://www.newtonma.gov/civicax/filebank/documents/95133>

Northland's proposal simply does not contain enough parking for a development of this size and will lead to overcrowding of narrow nearby residential streets which will adversely affect the neighborhoods¹⁴ and create both a nuisance and serious hazards to vehicles and pedestrians.¹⁵

While some members of the council have proposed that artificially reducing the number of needed parking spaces in combination with resident-only parking zones and permit parking in surrounding areas would change societal reliance on private vehicles and result in fewer cars, such measures have been shown to fail in nearby communities that have attempted them.¹⁶ Recent figures "highlight that more people almost always means more cars."¹⁷

Such mitigation efforts will also require expensive and burdensome enforcement and do not solve the underlying problem of insufficient parking being provided on-site, as required by Newton's Zoning Ordinance.

Thank you,



Leon Schwartz
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cc: Nadia Khan

¹⁴ See Sec. 7.3.3.C.2 of Newton's Zoning Ordinance (Chapter 30 of Newton City Ordinances), available at: <http://www.newtonma.gov/civicax/filebank/documents/69436>

¹⁵ Id; sec. 7.3.3.C.3.

¹⁶ See <https://www.bostonglobe.com/metro/2019/02/18/cambridge-wanted-big-drop-car-ownership-that-hasn-exactly-happened/sBu3TbWIBQLi5Nlo00L6AM/story.html>. New York, Chicago, and Seattle have experienced an increase in household car ownership over the last few years and Cambridge, which tried to reduce the ratio of cars owned by residents by 15% from 1990 levels by 2020 will fail to do so, even though "much of the construction in Cambridge and other cities is concentrated near train and bus lines" (which is not the case for the proposed Northland project).

¹⁷ Ibid.