



LOWER FALLS IMPROVEMENT ASSOCIATION RIVERSIDE COMMITTEE

PRESENTATION TO THE ZONING AND PLANNING AND LAND USE COMMITTEES

September 23, 2019

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Councilor Albright, Councilor Schwartz, Members of the Zoning and Planning Committee, Members of the Land Use Committee, Members of the City Council,

Traffic has been the number one concern of the Lower Falls and Auburndale neighborhoods from the beginning of this project.

Mark Development's new Riverside development proposal attempts to bring the site to a better place, which we all want.

But the details in these reports are very troubling. You have to dig deep and connect the dots to understand.

Mark Development prepared extensive documents to get MassDOT and Federal Highway Administration approval for a ramp from I-95 north. These interchange modification documents are very helpful when analyzing traffic congestion internal and external to the Riverside site because they describe critical information that is not included in the VHB traffic study provided to the city. That traffic study excludes traffic analysis along Main Street. This results naturally from the city and state highway and environmental regulators, having different reporting requirements. But you must examine all these documents together to begin to get a proper picture of the traffic congestion that will result if Riverside is developed in the manner proposed by Mark Development.

In order to assist the City Council in its review of Mark Development's plan, we offer to make ourselves available to the peer reviewer, Green International, so that they can make their independent judgment regarding the traffic issues that will be generated at Riverside. Mark Development and VHB have met with the peer review team. It makes sense to us that we should as well. We look forward to an official response to our offer from the City Council and from the Planning and Development Department.

Tonight I will discuss the traffic conditions, "**internal**" and "**external**" to the site. The VHB traffic study does not examine the intersections internal to Riverside and how they interact with the intersections external to Riverside. It is especially important to analyze what happens when a signalized intersection's queue extends through its adjacent **un**-signalized intersection. There are several situations where this will occur. This can block the **un**-signalized intersection and prevent garages from emptying.

In order to simplify our presentation tonight, I will focus only on evening peak hour traffic.



Generated traffic **not** considered:

- Game days affect 22% of commutes
- TNC rides- Uber, Lyft, etc.
- Green Line Transformation (GLT) will increase ridership

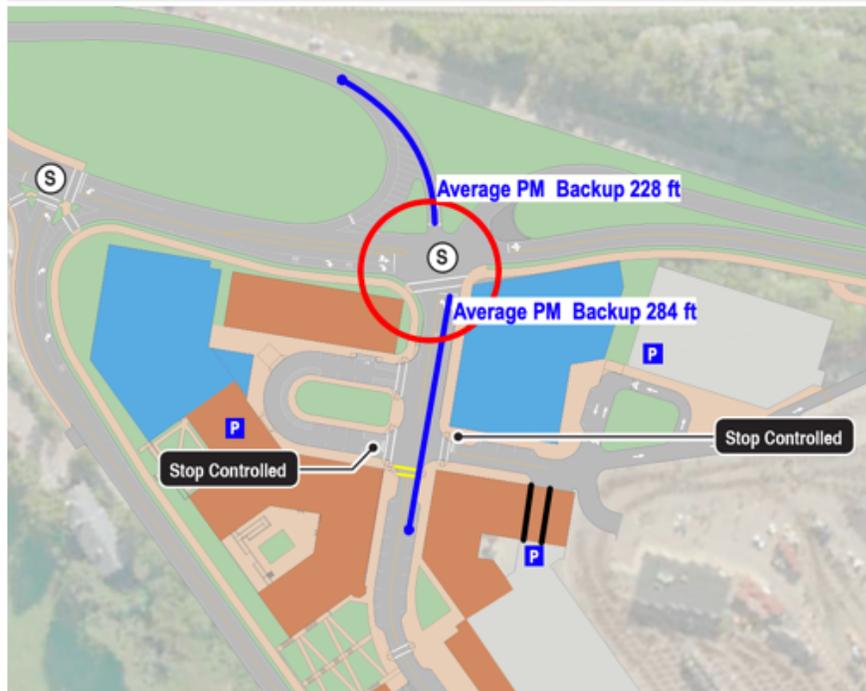
Slide 2 shows the entire site with three signalized intersections at the perimeter, and two un-signalized intersections internal to the site, which are controlled by stop signs.



Analysis of external traffic: 'significant problems at multiple intersections.'

Slide 3 shows average backups blocking internal intersections leading to the main signalized exit from Riverside.

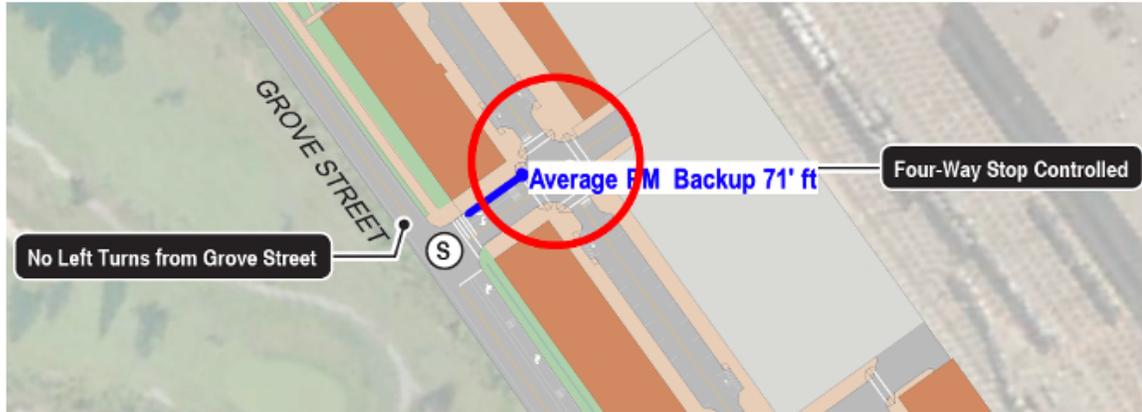
The average daily backup at the signal is 284 feet or about 19 car lengths.



External study shows traffic exiting at ramp signal blocks 3 of 4 garages

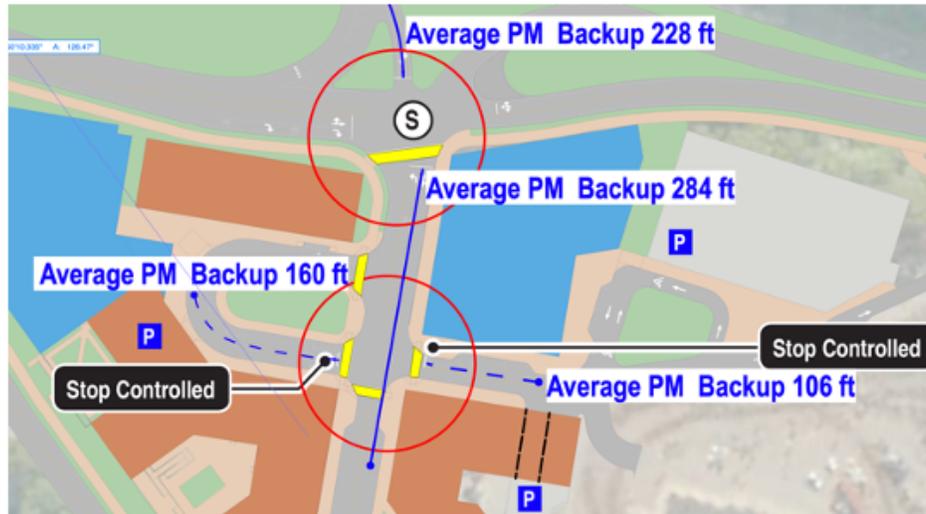
Slide 4 shows traffic exiting Riverside will queue onto Main Street and block the cross street from the hotel and the garage serving the 8-story office building #3, and from the garage serving the 13-story office building #1.

Evening traffic exiting to Grove Street may obstruct 4-way stop intersection if TNC, GLT & game day traffic included



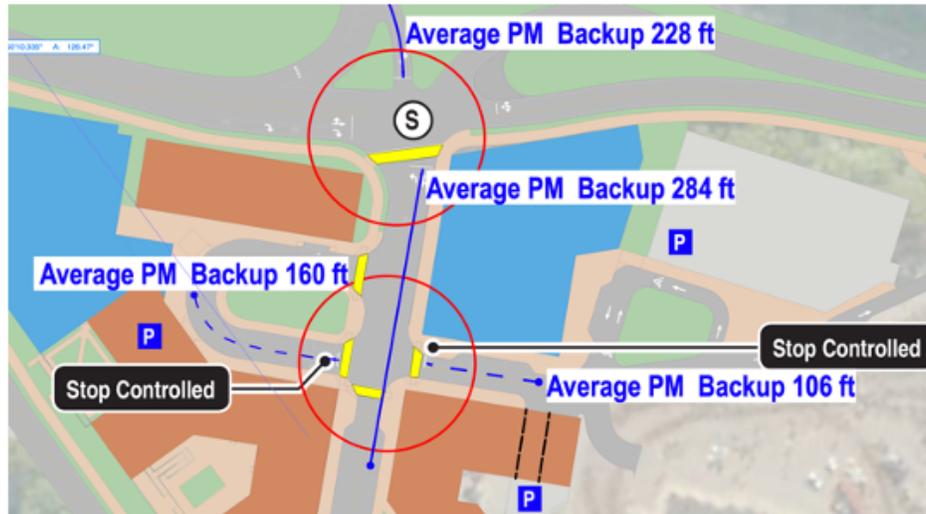
Slide 5 shows the backup at the exit directly onto Grove Street of 71 feet or about five car lengths. Just two more car lengths will block the crucial four-way stop at the center of the internal road system. When there is Red Sox game day traffic or if the Green Line Transformation project increases traffic volume to Riverside, blocking this intersection will become a regular occurrence with traffic backing up in the main garage building #9.

- Internal backups of 106 & 160 feet compound the external back up of 289 feet, trapping cars from exiting garage



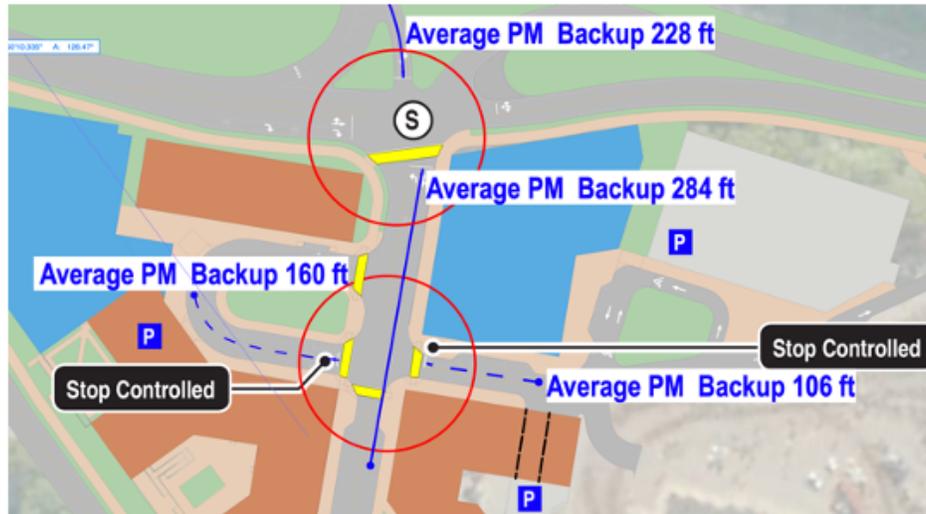
Slide 6 shows the average queuing on the unsignalized cross street is 160 feet or 11 car lengths and 106 feet or 7 car lengths. Notice the dashed queues on the side street, are blocked by the solid queue on Main Street.

- ‘Shared parking’ will boost pedestrian travel across walkways, slowing vehicular egress



Slide 7 shows that there are 4 pedestrian walks that will surely make this scenario worse. Because there is shared parking across the site, there will be heavy foot traffic during rush hour. This will slow down the release of congestion.

- ‘Shared parking’ will boost pedestrian travel across walkways, slowing vehicular egress



9/23/19

Slide 6

Zap & Land use Meeting

Slide 8

In conclusion:

The basic flaw in the Riverside concept is that **too much commuter** and **commercial** traffic will be arriving and departing at **the same time**. This will create an unpleasant environment for everyone including the many residents who will live on the site. They will invariably be adversely affected by the regular gridlock that will occur. This development needs to be made smaller and the traffic volume needs to be reduced, if this is going to be a successful development for commuters, office workers, retail establishments, hotel guests, and residents.



INTERNAL SITE TRAFFIC MUST BE ADDRESSED

Vision Plan, p. 25:

“The station's location at the confluence of Route 128 and the Mass Pike, along with its ample parking spaces, make it the premier park-and-ride option for Boston-bound commuters and visitors from the western part of the state.”

What's Missing from the Zoning Ordinance:

Any requirement to study internal site traffic; good internal site traffic flow is critical to the continued viability of Riverside as a park-and-ride facility.

Proposal:

Add a requirement that the developer fully analyze internal site traffic (LFIA Proposed Zoning Amendment, § 7.3.5.A.e)

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Staying, for the moment on traffic concerns, we would like to touch on what we believe are critical traffic issues that are not addressed in the current zoning ordinance and have not been addressed in the developer's special permit application.

Slide 9: Internal Site Traffic Analysis

One is the need for the developer's traffic study to include a rigorous analysis of internal site traffic, which isn't required under the current zoning ordinance.

It should be required. Civic Moxie described Riverside as “the premier park-and-ride option for Boston-bound commuters and visitors from the western part of the state.” If there are improvements implemented by the MBTA, park-and-ride usage could be increased.

We must recognize that development at Riverside may undermine its park-and-ride function if there are traffic backups getting into and out of the site and its parking garages. No one wants to get off a long ride on the Green Line only to have to wait in line to get out of the parking lot and to the highway.

The current zoning ordinance already has detailed requirements for the traffic study, but it includes no requirement for internal site traffic to be analyzed. We urge you to address this. Our proposal to add internal site traffic analyses to the existing traffic study requirements appears on p. 13 of our proposed zoning amendments.



THE REQUIREMENT TO IDENTIFY POST-CONSTRUCTION TRAFFIC MITIGATION MEASURES HAS NOT BEEN MET

The Current Ordinance:

- Special permit applicant must identify “[t]he means of making mitigations if it is found pursuant to [post-construction traffic monitoring] that the trips counted exceed the projected adjusted volume by 10 percent or more.” (Section 7.3.5.A.6.c.iii.)
- If the specified traffic volume is exceeded, mitigation measures must be implemented “to reduce the trip generation to 110 percent of the [projected] adjusted volume.” (Section 7.3.5.E.1.c.)

Mark Development’s Traffic Study (p. 116):

“As with other projects, if traffic monitoring determines the [sic] that the projected adjusted volumes are exceeded by 10 percent, additional mitigation measures may be necessary for the project. This may include:

- › Implement refinements to on-site traffic flow and parking management; and/or
- › Expand or modify the elements of the Transportation Demand Management Plan (TDM) measures in order to increase public transportation and/or other alternatives to automobile travel, subject to review of the Director of Planning and Development in consultation with the City’s Director of Transportation.”

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Slide: 10 POST-CONSTRUCTION TRAFFIC MITIGATION MEASURES

Another issue concerns post-construction traffic mitigation measures. One of the existing requirements for special permit applications in the MU3 zone is that the applicant identify the means by which traffic can be mitigated if it turns out that traffic volumes are more than 10% above what is projected. If traffic volume exceeds that amount, then the mitigation measures must be implemented to bring the actual volume down to 110% of the projected volume. These provisions are shown on this slide.

There are two significant concerns we have that are tied to these requirements:

One is that that Mark Development has not identified post-construction traffic mitigation measures.

The other is that, even if Mark Development had complied with the requirement to identify these measures, there is nothing in the current ordinance requiring the City Council to consider whether the mitigation measures will be effective.

On the first point, Mark Development addressed post-construction mitigation in its traffic study. What they said is on this slide.

As you can see, no mitigation measure has been identified. All Mark Development say is: we’ll make unspecified changes.

That falls far short of what is required.

Mark Development should be made to comply with the requirements of the ordinance. If it



MAKE SURE POST-CONSTRUCTION TRAFFIC MITIGATION PLAN WORKS BEFORE PERMIT IS GRANTED (Proposed Zoning Amendment Section 7.3.5.B.3)

- **What's Missing From the Current Ordinance:** Any provision requiring the City Council to assess the adequacy or anticipated efficacy of those post-construction mitigation measures, before granting a special permit.
- **Why it Matters:** Traffic projections can be wrong. The important obligation to undertake post-construction traffic mitigation if needed is entirely hollow if there is no determination, *in advance*, that the mitigation will work.
- **Proposal:** Add a requirement that the City Council determine that post-construction traffic mitigation will be effective before granting a special permit.

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Slide: 11: zoning amendment for assessment of post-construction traffic mitigation measures

The second issue of concern is that there is no special permit criterion directed to the post-construction mitigation measures. In other words, there is nothing that says that the City Council must look at the mitigation measures that have been proposed and assess them before granting a special permit. This completely undermines the requirement that the applicant identify mitigation measures.

Traffic engineering is not a perfect science. Predictions about the future may be wrong. This makes it vitally important to ensure that something can and will be done if the predictions are wrong. This is why the requirement to identify post-construction traffic mitigation measures was put into the ordinance. But, as I said, without an associated special permit criterion, that requirement is hollow.

This project should not be approved on a hope and prayer that traffic turns out not to be too intolerably bad. If those hopes do not materialize, we must be sure that there are real steps that can and will be taken to remedy the problem.

We urge you to adopt our proposal to add a post-construction traffic mitigation criterion to the MU3 zone. You can find that proposal on page 3 of our proposed zoning amendments.



ASSESS CONSTRUCTION IMPACTS BEFORE GRANTING A SPECIAL PERMIT

Determine Before a Special Permit is Granted What Impacts Construction Will Have and How They Will be Managed

- Construction could take many years. The surrounding neighborhoods should not be subjected to more than minimal noise, traffic, dust and other potential adverse effects for such a prolonged period.
- Construction will likely coincide with major disruption of the Mass. Pike (due to the Allston interchange project). Expected increased commuter demand at Riverside will need to be accommodated while Riverside is under construction.

LFIA Proposed Zoning Amendments

- Add requirement to submit construction management plan and assessment of impacts on the surrounding neighborhoods. (Proposed § 7.3.5.A.10)
- Add special permit criteria protecting Auburndale and Newton Lower Falls from any significant adverse construction impacts. (Proposed § 7.3.5.B.19)

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Slide 12: Construction Management Plan

Also related to traffic as well as other concerns, there must be a thoroughly vetted construction management plan in place before a special permit is granted. There is no provision in the zoning ordinance for this.

We have raised this issue before, but the need to address it seems even more important now. As Councilor Markiewicz mentioned at the last hearing, there is going to be a major reconfiguration of the Mass. Pike at the Allston interchange. It looks likely that the Mass. Pike construction work and the Riverside construction work will be going on at the same time. With the major traffic disruption on the Mass. Pike, we can expect increased use of Riverside by park and ride commuters. We have heard nothing to date from the developer about construction management in general and certainly nothing about how this increased influx of commuters will be handled. This isn't surprising since there's nothing in the zoning ordinance requiring the developer to provide a construction management plan.

This is too important to be left out. Everyone should want to know **now**, and not after the special permit is granted, if there is a well thought out and viable construction management plan.

We know that the Planning Department has cautioned against constraining discretion in the land use process, but it does not constrain discretion to require that more information, rather than less, is before the City Council.

As indicated on this slide, our proposed zoning amendments include a requirement that the developer



RESPECT SCENIC GROVE STREET



Grove Street Now



**Planned Grove Street
(from a fictional perspective
that misrepresents the south side
of the street)**

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Slide 13: Scenic Grove

We would also like to remind you how important it is that this development be respectful of the character of Grove Street. We understand and accept that Grove Street will change, but we think the developer should be required to do better than this at respecting this designated scenic road.

And while you are looking at this photograph on the left and rendering on the right, please note the Planning Department has applauded Mark Development for providing pedestrian perspective renderings of Grove Street. That is not what this rendering is. As you can see from the photograph of the actual Grove Street, no pedestrian will see the site from this perspective, since they'd have to be standing in the golf course behind the fence.

In fact, there isn't a sidewalk on the side of Grove Street and there isn't a plan to add one. A pedestrian perspective of Grove Street would be on the actual sidewalk in front of the development, where there will be an imposing wall of buildings.



EXISTING HOTEL INDIGO FROM LOWER FALLS

The Planned Buildings Will
be Highly Visible in Lower Falls



The Indigo would be replaced with an even taller building
and the office tower would be just to the left.

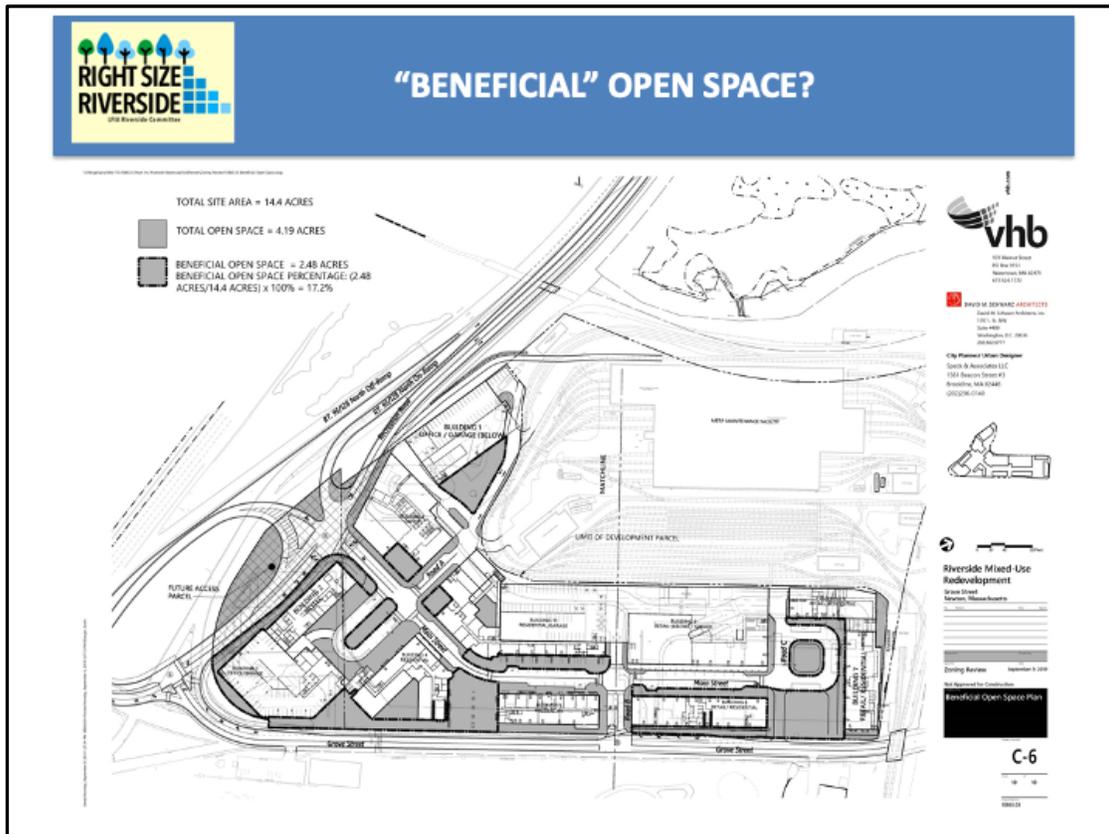
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Slide 14: BUILDING HEIGHTS

Concerning building heights, we are of course pleased that the condominium portion of what was the combined hotel and condo building has been removed, which as we mentioned at the last hearing, essentially reverts to what was presented to the community in March of 2018.

The office tower has come down one story. It continues to be of significant concern. As with the Grove Street renderings, the renderings showing the building heights as they would appear from Lower Falls must be viewed with some skepticism. Please note for example that some of the photos were taken so that there is a tree branch in the foreground significantly obscuring the building in the background and that Hamilton Field appears to be massive when, in reality its about 550 feet across.

The photo in this slide is of the existing Hotel Indigo from DeForest Road in Lower Falls. Please consider this if you believe the proposed development will be barely visible from Lower Falls.



Slide 15: beneficial open space

With respect to open space, weakness of the “beneficial open space” concept found in the current ordinance is on display, once again, in Mark Development’s revised filing. As you can see on this sheet from Mark Development’s new plans, to get to the 17% claimed beneficial open space, many of the areas included are just sidewalks or small left-over spaces around buildings.

Also, the quality of the claimed beneficial open space areas must be considered in light of the level of anticipated traffic within the site, including the space in the middle of what Mark Development calls transit square which is planned to be filled with MBTA buses, private buses, and shuttle vans as well as taxis, Ubers and private vehicles there for pick up and drop off.