



Marc C. Laredo
Mayor

City of Newton, Massachusetts
Department of Planning and Development
1000 Commonwealth Avenue Newton, Massachusetts 02459

Katie Whewell
Acting Director

PUBLIC HEARING/WORKING SESSION MEMORANDUM

DATE: January 21, 2025

MEETING DATE: January 28, 2025

TO: Land Use Committee of the City Council

FROM: Katie Whewell, Acting Director of Planning and Development
Lara Kritzer, Acting Deputy Director of Planning and Development
Cat Kemmett, Deputy Chief Planner for Current Planning

CC: Petitioner

SUBJECT: **#CP-25-1** WP East Acquisitions, requesting a Comprehensive Permit, pursuant to M.G.L. Chapter 40B to construct a 234-unit residential development on a 2.7 square acre lot located at 19 Court Street #1, 19 Court Street #2, 21 Court Street, 34 Crafts Street, 36 Crafts Street, 38 Crafts Street, 48 Crafts Street, and 50 Crafts Street within the Multi-Residence 1 (MR-1) and Manufacturing (M) zoning districts. The proposal includes 59 affordable units and 290 parking spaces.

Application Materials: <https://newtonma.viewpointcloud.com/records/896385>

In response to questions raised at the City Council public hearing, the Planning Department is providing the following information for the upcoming public hearing/working session. This information is supplemental to staff analysis previously provided at the Zoning Board of Appeals public hearing.

Background

The Applicant, WP East Acquisitions, is seeking a Comprehensive Permit to construct a new all-residential multifamily development. The subject site includes seven parcels along the west side of Crafts Street in the Newtonville neighborhood. This plan proposes a total of 234 apartments in a single building, with a total of 290 parking spaces.

November 19, 2025 Public Hearing

The first public hearing for this petition opened on November 19, 2025 and was held open. At that time, the Planning Department sought authorization for on-call peer review consultants for the following areas: urban design, stormwater management, and transportation/traffic. These peer reviews were authorized and the initial analyses for those topic areas are included as attachments to this memo. At the meeting, members of the Zoning Board of Appeals, staff, and members of the public shared comments and asked questions about the project. Topics raised at this meeting include concerns about potential parking and traffic impacts in the neighborhood, interest in deeper levels of affordability for the Inclusionary units, feedback on the height and massing of the building, and requests for further information and refinement of the programming of open space and pedestrian and bicycle access on the site.

Urban Design

The City's urban design peer reviewer for this application, NBBJ, submitted a memorandum on January 20, 2026 (**Attachment A**). NBBJ observed that the project is proposed to include one six-story building without an appreciable step back at the top. They recommend the applicant consider stepping back the top floor or two to reduce the massing of the building facing the residences on Court Street. NBBJ suggested more evaluation of the impacts of shadows created by this project, including new shadows cast on Court Street and on the new proposed pool at the southwest corner of the property. They note that stepping portions of the top floor or floors back could reduce shadow impacts in addition to mitigating the massing of the building on the upper floors. This analysis echoes Planning's original assessment to explore ways to reduce the massing (FAR) of the building and consideration of residential abutters.

Open space proposed for the site includes a dog run, outdoor pool, and landscaping along the frontage. In reviewing the open space, NBBJ requested further detail about the programming of these outdoor spaces, including the proposed dog park. NBBJ raised a concern about the removal of trees, with the proposed plans indicating the removal of all existing on-site trees, and wondered whether some of those mature trees could be retained through adjusting the layout of other outdoor amenities.

NBBJ's analysis includes some design recommendations for the interior configuration of the first floor. They observed that some of the ground floor residences along the south side will have a

direct line of site to the trash removal and delivery operations, which could prove noisy and have a significant negative impact. They recommend a design change to shift other less sensitive common uses on the ground floor, such as a mail room or workout facility, to be adjacent to those functions rather than residential areas. They note that the main lobby is large but enclosed, and wonder whether the location or size of the lobby on Crafts Street could be reworked to allow for the creation of a landscaped courtyard. In NBBJ's assessment the southeast corner of the building will be the first part of the building many see, which has balconies that stick out and appear to present more as the rear of a dwelling. NBBJ offers analysis on the southwest and southeast corners as an area that could be improved through architectural features to look more like a front of building through the use of more prominent corner windows or other creative design elements.

Transportation

The City's transportation peer reviewer for this application, BETA, submitted a memorandum dated January 20, 2026 (**Attachment B**). During visits to the site BETA observed vehicles queued along Crafts Street from the Washington Street intersection during peak periods during the weekday, with the queue sometimes hindering sightlines for vehicles exiting Whole Foods. Because these lines will continue to form and the proposed development may have an impact on this queueing, Beta recommends the applicant create safety measures for motorists exiting the project site onto Crafts Street. They also note that landscaping, vegetation, and signage along the frontage of the site should be kept low to the ground (3 feet or less above street level) or be set back along the edges of the site and driveway to maintain adequate sightlines.

BETA includes in their memo the fact that there have been two non-motorist crashes at the Watertown Street/Crafts Street intersection in recent years. BETA observes that the applicant team utilizes 5-year data from 2017 to 2021 and requests their analysis be updated to reflect data instead from 2021 to 2025 to better reflect current safety conditions and provide detail on these incidents with vulnerable road users to identify safety deficiencies and develop countermeasures. BETA highlighted some challenges pedestrians face in navigating the intersection of Washington Street with Adams Street/Lewis Terrace and with Jackson Road, which have no pedestrian countdown signals and have pedestrian crossings that work concurrently with traffic movements, introducing opportunities for conflicts. BETA requests more information about crossing times and pedestrian delays at nearby intersections.

BETA requests that the applicant clarify which data was used to evaluate mode share uses, as BETA references the US Census Bureau numbers which has a higher rate of vehicle trips than the applicant team estimated (putting mode share for trips at 75% vehicles, vehicle 75%, 17% transit, and 8% bike/walk). They note the close proximity of several buses and the commuter rail and ask the applicant to clarify how residents will be incentivized to utilize public transit. The applicant has provided a proposed Transportation Demand Management (TDM) plan to encourage alternatives to driving. This plan includes on-site bicycle storage, displays of public transit

schedules, and maps for transit users. Staff recommend the applicant expand this TDM plan to include subsidized MBTA passes, a transit fund as seen in recent Comprehensive permit approvals, and/or Bluebikes memberships.

The applicant's site circulation plan calls for delivery vehicles to travel from the site through the Court Street neighborhood. Beta asked for more details about how they will enter and exit and when and how many deliveries per day expected. They also request the applicant to clarify the anticipated operations for the loading zone along the 36 Crafts Street driveway, including turning templates and anticipated frequency of use of this zone. Similarly, further information is requested regarding the design and operations for the passenger loading zone along the west side of Crafts Street. Staff also note that the passenger loading zone appears to lie within the City's right of way on Crafts Street and request that the applicant clarify if that is their intention.

BETA noted several concerns about the egress only Court Street driveway, which will be converted to one-way westbound traffic from the proposed new garage driveway and Court Street. The main access and exit driveway will be near 36 Crafts Street, but is not intended to be a public way between Crafts Street and Court Street. BETA recommends the applicant discuss how the public will be discouraged from using the 36 Crafts Street driveway as it could be seen as desirable to use this route as a cut-through. Additionally, they recommend the applicant utilize striping and signage to discourage motorists from driving the wrong way up the one-way Court Street drive.

With attention to mitigation measures for transportation demand, Beta notes that MassDOT guidelines require the applicant to commit to a mitigation program if a proposed development adds vehicle trips to a facility that operates at or below Level of Service E (LOS E). They identify the following locations as having lanes or times when they are operating at LOS E or below (worse) should this project be constructed as proposed and encourage the applicant to coordinate with the City to identify specific traffic mitigation improvements in these areas:

- Whole Foods driveway eastbound approach to Crafts Street and Lengen Road
- Overall intersection of Washington Street, Crafts Street, and Santander bank driveway
- Washington Street westbound approach
- Crafts Street southbound shared left turn/through lane
- Washington Street eastbound approach
- Lewis Terrace northbound shared left turn/through lane
- Adams Street southbound shared left turn/through lane
- Washington Street eastbound approach to Jackson Street

Stormwater

In its current state, the site has minimal stormwater management measures except for several catch basins. The redevelopment of the site triggers the City's stormwater ordinance which

requires that surface water be contained and treated on site. The Associate City Engineer issued a memorandum dated November 14, 2025 (**Attachment C**). This memo notes that the site contains two City of Newton Drain Easements which are not clearly identified on the site plans provided, and requests that the limits and locations of these easements must be provided on a revised plan. It also notes that the proposed location of the outdoor pool and dog park will necessitate the relocation of a City drain. This relocation will require approval by the Public Facilities Committee and a new 20-foot-wide easement to be granted to the City, with installation costs to be paid for by the applicant.

The City Engineer has provided a memo dated November 13, 2025 addressing the sewer infiltration/inflow mitigation fee for the project (**Attachment D**). The City Engineer indicated that the fee for the proposed development would be \$2,266,576 and the City Council may, for good cause shown, abate the fee in whole or in part. The memo indicates that the City Engineer recommends that 75% of the fee be abated, and that the developer consider dedicating that amount, \$ 1,699,932, toward other mitigation purposes in the vicinity.

The City's peer review for stormwater and drainage systems, Horsley Witten (HW), reviewed the project in a memo dated January 15, 2026 (**Attachment E**). In its current state, the site has minimal stormwater management measures except for several catch basins. The redevelopment of the site triggers the City's stormwater ordinance which requires that surface water be contained and treated on site. HW notes that the design as proposed appears to reduce peak flows and peak volumes offsite as required, and includes measures such as catch basins, structural water quality devices, and subsurface infiltration systems. HW asked for further data and clarifications on several elements of the site design which will be discussed in greater detail at the next public hearing.

Next Steps

City staff, its consultants, as well as the development team will be available at the January 28, 2026 hearing to expand on any areas identified in their reviews and answer any questions from the Board.

ATTACHMENT A : Urban Design Review, Prepared by NBBJ, January 19, 2026

ATTACHMENT B: Transportation Peer Review, Prepared by Beta Group, Inc, January 20, 2026

ATTACHMENT C: City Engineering memo, November 13, 2025

ATTACHMENT D: City Inflow & Infiltration memo, November 14, 2025

ATTACHMENT E: Stormwater Review, Prepared by Horsley Witten Group, January 15, 2026



www.nbbj.com

January 19, 2026

Ms. Cat Kemmett
City of Newton
1000 Commonwealth Ave
Newton, MA 02459

Subject: NBBJ Memo #1 for 38 Crafts Street Special Permit Application

Dear Ms. Kemmett,

NBBJ is pleased to provide the following peer review for 38 Crafts Street Special Permit Application

Scope of Work

NBBJ is contracted to provide design (peer) review services to the Newton City Council and Design Review Board to address Urban Design issues in coordination with additional transportation and civil engineering reviews provided by others.

Specifically, NBBJ is scoped to provide design review for proposed:

- open space
- building placement
- relationship to streets
- nearby structures and overall massing
- proposed landscaping
- lighting plans
- shadow impacts

For this review, NBBJ has utilized prior City planning documents such as Newton Chapter 30 Zoning Ordinance, Washington Street Vision Plan, and Village Center Overlay District Zoning ordinance as potential guides for reasonable standards as well as approved and built projects in Newton including prior 40B projects.

The following comments are based on documents submitted to the City dated October 23, 2025 and consolidated staff comments for the ZBA dated November 12, 2025.

In order to provide clarity of this review we have formatted this review according to the Project Narrative and the consolidated staff comments relating to Site Plan Review. Our areas of discussion will be limited to the following criteria but may overlap with other design review comments:

Subjects for commentary as organized by site plan review requirements

- Height, bulk and placement of the proposed buildings,
- On-site Vehicular and Pedestrian Movements
- Off Street Loading - Building Services
- Structure Screening
- Shadow Analysis
- Historic Resources
- Pedestrian and Neighborhood Considerations
- Pedestrian Scale
- Adequacy of Public Space
- Enhanced Open Spaces
- Excellence in Place Making

Documents Reviewed including the architectural, landscape and civil plans dated October 23, 2025.

Project Description:

The Applicant proposes a singular multifamily residential building with its associated parking located internally. The site comprises a total of seven parcels, five fronting Crafts Street, two on Court Street on a 2.66-acre site. There would be a total of 234 apartments ranging from studios to three-bedroom apartments, of which 59 (25%) would be affordable at 80% of area median income (AMI). A total of 290 parking spaces are proposed.

Zoning Relief:

In 2022, the Newton City Council had granted a rezoning to the Business 4 (BU4) zoning district and a corresponding special permit for this site to allow a six-story building up to 72 feet in height containing elderly housing with services use. While the rezoning was conditioned upon the exercise of the special permit, which did not happen, the BU4 zone allows for 96 feet in height and a floor area ratio (FAR) of 2.5 for a six-story building. The previously approved six-story building as designed consisted of an FAR of 1.85 and included 144 parking stalls, both surface and within a parking garage. The previous approval also allowed for dimensional waivers for the parking configuration.

Zoning relief from the current zoning (Manufacturing, MAN and RM1) is needed for both

height, density (FAR) and setbacks. Specifically, front setback (Crafts Street) from 39.5 feet to the proposed 10.1 feet and all other setbacks from both residential and commercial abutters.

COMMENTARY BY REVIEW TOPIC

Height, bulk and placement of the proposed buildings

The prior approved project at the site included a building mass of seven stories, but it was clearly set back at upper levels to break the vertical massing of the façade and step the building down to Crafts Street and smaller residential buildings. The proposed building merely changes materials at the top floor but does not appreciably set back that level.

We recommend some studies to show how physically recessing the top floor, or two, would help to reduce the building mass relative to buildings across Craft Street.

The proponent argues that the large building has been broken up with articulated forms and landscaped courts, especially along Crafts Street where the pedestrian entrance is recessed at the upper levels with a single story lobby extending between. However the lobby occupies what might have been an actual landscaped courtyard so other than along the north side of the building there is not an actual landscaped courtyard along Crafts Street.

We recommend further study of the location or size of the lobby on Crafts Street to increase the size of the actual landscaped courtyard as a feature of the project.

We note the proposed design of the prominent southeast and southwest building corners at Crafts and Court Street. On Crafts Street the southeast corner is primarily made of recessed balconies which, in our opinion, are more appropriate for the rear of a building than a prominent acute angle facing a major street. While the southwest corner facing Court Street could use further study to take advantage of the prominent corner. Most traditional apartment buildings feature these types of corners with bay windows that wrap the corner and emphasize the excellent light available to the units and living spaces within.

We recommend that these corners be studied further to better reflect of typical apartment buildings in the City and region.

Shadow Analysis

Shadow analysis indicates increased shadow impacts on the east and west sides of the project during early morning or late afternoons in the fall and winter months. Building heights

at Court Street are more than three times the allowed height in a MR1 zone. The current MAN zoning is limited to 24 feet and two stories, The current project exceeds these restrictions. One test to see if the impacts are meaningful would be to compare them, not to existing conditions, but to as-of-right or conditional development in a RM-1 and MAN zone and compare the shadow impacts to the currently proposed project. This will give nearby residents and better understanding of the net new impact that this project will have over as-of-right or conditional development, which residents would have the right to comment.

If the shadow impacts are significantly greater, the proponent may consider dropping down the 6th level to reduce shadow impacts on the adjacent RM1 and RM2 zones. Likewise, pulling back the upper levels may also achieve the same effect by reducing shadows.

Off Street Loading - Building Services

The loading locations seem appropriate adjacent to either commercial uses on the south side of the project or along Crafts Street. (see notes on impacts to project residents below)

The proponent should demonstrate that the drop off on Crafts Street is large enough for typical delivery and pick-up needs of 234 units?

Structure Screening

For residents on the lower floors adjacent to the commercial uses on the south side of the project what is the strategy for sound and visual screening the loading and trash? Additionally, what types of screening are provided between the pool area and adjacent residences to reduce noise or lighting impacts?

Please provide more details on screening for both sound and lighting? What is the plan for hours of use of the pool area?

Historic and Natural Resources

The proponent is proposing to remove all existing trees from the property including trees up to 44 inches in caliper. Existing mature trees will require a waiver for their removal. We note that new tree replacements will take decades to provide the same shading benefits (heat island) as mature trees. Could some of these mature trees be preserved to provide some visual features at the pool area and protect west facing residences from afternoon summer sun?

Proponent should demonstrate why all trees need removal even those that are not directly under the structure, landscape features or new utilities. Can outdoor landscape features such as the pool and patio be adjusted to allow for tree preservation?

There do not appear to be any historic impacts other than removal of two existing homes on Court Street. Could one of these homes be reused for an amenity clubhouse at the pool area and buffer the residences on Court Street better. (relates to notes on building massing, above)

Pedestrian Scale

Planning department staff encourages the project to consider further activation of the Crafts Street frontage through its lobby and entry area. We suggest that additional building entrances could enhance Craft Street activation.

Could units along Crafts Street have separate porch entrances that would provide more active street frontage? Could the lobby and active common spaces be more visible from the street?

Enhanced Open Spaces

The proposed pool area appears to be adversely shadowed by the proposed 6 story building directly to the south blocking much of the sun access. Could the massing of the building be reconsidered to provide better solar access to this outdoor amenity space?

Please provide more details on the programming of outdoor spaces, including roof decks, and adjacent indoor amenities

Public Space

We note that none of the open space is intended for public use. Prior planning projects in the area (78 Crafts Street) have included publicly accessible playgrounds and dog parks. Could the fire lane area off Court Street be used for a dog park or other compatible use? Could the north side open space be better utilized for the dog park that would be publicly accessible?

Please provide more detail on the programming of outdoor open spaces whether these spaces are intended for public or private use.

Pedestrian and Neighborhood Considerations

We appreciate the publicly accessible pedestrian connection through the site from Court to Crafts Street. We also understand that the driveway will NOT be publicly accessible.

Please further describe how pedestrians will understand that they are allowed to use the sidewalk while vehicles are prohibited. Could the proponent argue for a pedestrian connection (through the existing chain link fencing) to the parking lot of the commercial uses along Beacon Street?

On-site Vehicular Movements

We note that some of the ground level residential units along the south side are going to be highly impacted by the project's own trash removal and delivery operations. Should these units be replaced with less sensitive common uses such as mail or storage rooms or workout facilities?

Please explain how the lobby space will be programmed and could some of these common uses be shifted southward to replace the impacted units.

Excellence in Place Making

We note that the east extension of Court Street is a "Private Way" but is currently used to access the existing homes that are to be demolished. The proposed driveway does not utilize this Private Way but rather bypasses it to the north. Will the resulting condition leave the Private Way in its current paved condition, or could the proponent, in cooperation with the land owner, offer to create a more attractive space here for Court Street residents?

Could the proponent study the utilization of this current easement to redirect the proposed driveway and gain more landscaped space for residents and less impervious surfaces and perhaps save existing landscape and vegetation? Could relocating the driveway allow for the preservation of one of the existing homes on Court Street to provide more buffer and transition to the neighborhood scale?

We ask that the proponent consider the use or improvement of the Private Way for the benefit of the Court Street neighborhood.

We truly appreciate the opportunity to offer design review service to the City of Newton.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Mountjoy". The signature is fluid and cursive, with the first name "Alan" being more prominent than the last name "Mountjoy".

Alan Mountjoy, Consulting Principal, NBBJ

January 20, 2026

Cat Kemmett, Deputy Chief Planner
City of Newton Planning and Development Department
1000 Commonwealth Avenue
Newton Centre, MA 02459

Re: Transportation Peer Review
38 Crafts Street 40B Residential Development

Dear Ms. Kemmett:

BETA Group, Inc. (BETA) has completed a transportation engineering peer review for the proposed 40B housing development to be located at 38 Crafts Street in Newton, Massachusetts. The site currently contains two commercial buildings (36 and 38 Crafts Street) and a school bus surface parking lot (48 Crafts Street) with access provided via five driveways along the west side of Crafts Street. In addition, the site includes two residential buildings (19 and 21 Court Street) with access provided via two driveways (one wide curb cut) along the north side of Court Street.

The proposed development plan involves the demolition of all existing structures and the construction of a new 234-unit, 6-story multi-family residential building and parking garage. The updated access strategy includes one full-access driveway on Crafts Street that will serve as the primary access, as well as one exit-only driveway on Court Street that will also serve as an ingress for emergency vehicles. This peer review letter outlines the findings, comments, and recommendations resulting from the comprehensive transportation engineering assessment of the proposed development's impact and design.

BASIS OF REVIEW

BETA has conducted a traffic peer review of the Transportation Impact and Access Study (TIAS), 38 Crafts Street, Crafts Street & Court Street, Newton, MA, dated November 2025 and prepared by Vanasse Hangen Brustline, Inc. (VHB). The Appendix of the traffic study included Sheet C 3.00: Zoning Assessment Plan Summaries and Sheet C 6.00: Layout and Materials Plan, both dated October 16, 2025, and prepared by VHB. In addition, the transportation review included the Floor and Garage Plans, dated September 2, 2025, and prepared by PCA, Inc. in relation to on-site parking spaces and vehicle access for the garage. The review specifically assessed compliance with City of Newton transportation requirements, as well as ensuring consistency with applicable national, state, and local guidelines, standards, and regulations. BETA staff also conducted site visits within the study area to observe transportation conditions during weekday peak periods and attended the site walk on Thursday, January 8, 2026.

FINDINGS, COMMENTS, AND RECOMMENDATIONS

STUDY AREA

The traffic impacts of the proposed development were evaluated at the following 'study area' intersections:

- Crafts Street and Watertown Street
- Crafts Street and Ashmont Avenue
- Crafts Street, Clinton Street, and Maguire Court
- Crafts Street, Lincoln Road, and 48 Crafts Street driveway (bus parking lot)
- Crafts Street, 29 Crafts Street driveway, and 38 Crafts Street driveway
- Crafts Street and 36 Crafts Street driveway
- Crafts Street, Lenglen Road, and Whole Foods driveway
- Washington Street and Harvard Street
- Washington Street and Court Street
- Washington Street, Crafts Street, and Santander Bank driveway
- Washington Street, Adams Street, and Lewis Terrace
- Washington Street and Jackson Road

Consistent with industry-standard practices, this assessment utilizes established methodologies for determining which intersections warrant detailed evaluation. Specifically, Institute of Transportation Engineers (ITE) methodologies¹ and Massachusetts Department of Transportation's (MassDOT's) Transportation Impact Assessment (TIA) Guidelines Section 3 Chapter I.C² recommend the evaluation of intersections projected to experience a noticeable impact from site-generated trips during peak hours. A noticeable impact is defined by two primary thresholds, either of which would necessitate further analysis: an increase of 100 or more peak hour vehicles or a relative increase of 5% or more in total peak hour traffic volumes through an intersection. These thresholds are based on the rationale that changes of this magnitude have the potential to noticeably affect existing vehicular operations at an intersection.

- T1. Based on the trip-generation and distribution projections detailed in Figures 8 and 9 of the TIAS, the selected study area intersections meet these evaluation criteria and are therefore deemed appropriate for this analysis. Should no adjustment be made to the trip-generation calculations, then no action or response is required.
- T2. During the January 8, 2026, site walk, comments were raised related to vehicles cutting through nearby neighborhoods to avoid congested roadway segments. For example, motorists may use different routes between Crafts Street and Washington Street, such as Lenglen Road, Clinton Street, and Lincoln Road. The Applicant should provide a qualitative assessment of these routes in the vicinity of the proposed development (e.g., field observations to identify traffic and safety deficiencies) as they may also be used by site vehicles.

¹ Transportation Impact Analyses for Site Development: An ITE Proposed Recommended Practice. Washington, DC: Institute of Transportation Engineers, 2010.

² Massachusetts Department of Transportation. "Transportation Impact Assessment (TIA) Guidelines." MassDOT Development Review – Planning Process. Commonwealth of Massachusetts, 13 Mar. 2014.

EXISTING CONDITIONS

TRAFFIC COUNTS

TIME PERIODS

Traffic counts were collected at the study area intersections during the weekday AM peak period (7:00-9:00 AM) and the weekday PM peak period (4:00-6:00 PM) on Thursday, September 18, 2025. In addition, weekday and Saturday daily traffic and vehicle speed counts were collected along Crafts Street south of Lincoln Road between Thursday, September 18, 2025, and Saturday, September 20, 2025.

- T3. This data collection program aligns with standard traffic engineering practices applicable to residential developments and conforms to the specifications outlined in Section 3, Chapter II of the MassDOT TIA Guidelines. No action or response is required.

PEAK HOURS

As stated within the TIAS, the turning movement count (TMC) data indicates that the weekday AM peak hour generally occurs between 8:00-9:00 AM and the weekday PM peak hour generally occurs between 5:00-6:00 PM. The TIAS states that the traffic counts collected at all intersections were used for the same peak hours since most of the study area intersections experienced the same peak hours (8:00-9:00 AM and 5:00-6:00 PM).

- T4. Based on BETA's review of the TMC data provided in the Appendix, most of the study area intersections peaked between 8:00-9:00 AM during the weekday AM peak hour and between 5:00-6:00 PM during the weekday PM peak hour. The only exceptions were:
- The Crafts Street and Watertown Street intersection and the Washington Street and Jackson Road intersection peaked between 7:45-8:45 AM during the weekday AM peak hour.
 - The Crafts Street, 29 Crafts Street driveway, and 38 Crafts Street driveway intersection and the Crafts Street, Lenglen Road, and Whole Foods driveway peaked between 4:30-5:30 PM during the weekday PM peak hour.
 - The Washington Street/Court Street intersection peaked between 4:45-5:45 PM during the weekday PM peak hour.

Based on standard traffic engineering practice, using a consistent peak hour generally represents the period with the highest cumulative volume within the study area, allows for balanced traffic volumes between intersections, and provides a cohesive assessment of how the entire system operates under congested conditions. Consideration of using individual intersection peak hours may occur when an intersection has a unique traffic generator (a large industrial complex or a hospital with a specific shift change, or near a school, church, casino, or movie theater). No action or response is required.

- T5. The TMCs included bicycles and pedestrians captured at the study area intersections. With the availability of public transit facilities in the area and a mode share of estimated site trips applied to the proposed residential development (i.e., vehicle trips, transit trips, and bike/walk trips), the Applicant should provide a figure depicting the existing walking and biking volumes during the peak hours at the study area intersections (similar to Figures 3 and 4 that depict the traffic volumes).

TRAFFIC VOLUME SUMMARY

T6. The following typographical errors were identified within Table 1: Existing Traffic Volume Summary of the TIAS.

- The “Source” footnote omits the reference for the Automated Traffic Recorder (ATR) count data collected and tabulated for Saturday, September 20, 2025.
- The “Note” footnote appears to be missing a word or term (e.g., “*Peak hours do not necessarily [coincide] with the peak hours of the turning movement counts.*”).
- The weekday daily traffic volume does not coincide with the ATR count data provided in the Appendix of the traffic study (11,200 vehicles per day [traffic study] vs. 11,279 vehicles per day [ATR count]).

These identified errors are clerical in nature and do not affect the validity of the reported baseline traffic volumes in the TIAS. No action or response is required.

SEASONAL ADJUSTMENT

Traffic on a roadway typically fluctuates throughout the year depending on the area and the type of roadway. To determine if the September traffic-count data needed to be adjusted to account for this fluctuation, seasonal traffic-volume data were evaluated from MassDOT’s traffic data collection database. The TIAS found that September traffic volumes are above average-month traffic volume conditions. Therefore, the traffic counts were used as collected without a downward adjustment to reflect above average traffic volume conditions.

T7. The specific “Roadway Factor Group” utilized in the seasonal adjustment evaluation was not identified in the TIAS. Based on a review of the MassDOT Statewide Traffic Data Collection 2024 Weekday Seasonal Factors provided in the Appendix of the traffic study, September traffic data is consistent with average or above-average monthly conditions across all listed roadways. Therefore, the applied seasonal adjustment methodology adheres to the standards outlined in Section 3, Chapter II.G.2 of the MassDOT TIA Guidelines and Chapter I.B.2.a of the MassDOT 25% Design Submission Guidelines.³ No action or response is required.

SAFETY ANALYSIS

Crash data for the study area intersections were obtained from MassDOT between 2017 and 2021 to represent the most recent 5-year period. In addition, incident occurrence was compared to the volume of traffic through each intersection to determine significance and whether potential safety problems exist. Accordingly, crash rates were calculated for each study area intersection and compared with statewide and district-wide (MassDOT District 6) averages. Based on this evaluation, the study area intersections were not noted to have experienced safety concerns. In addition, none of the study area intersections are included on MassDOT’s Highway Safety Improvement Program (HSIP) as high crash cluster locations.

T8. As specified in Section 3, Chapter III.F of the MassDOT TIA Guidelines, the most recent 5 years of crash data is required for analysis. MassDOT’s Interactive Mapping Portal for Analysis and Crash Tracking (IMPACT) website currently provides complete crash data through the end of

³ Massachusetts Department of Transportation. “Traffic and Safety Engineering, 25% Design Submission Guidelines.” Massachusetts Department of Transportation Highway Division. Commonwealth of Massachusetts, 31 May 2022.

2025. Therefore, the crash data period utilized in the TIAS requires revision to align with MassDOT guidelines (e.g., between 2021 and 2025).

- T9. As noted in Section 3 Chapter III.F of MassDOT's TIA Guidelines, traffic safety analysis should integrate state crash records with available local data. To meet this requirement, the Applicant should coordinate with the Newton Police Department to supplement the study area's transportation safety analysis, given that the roadways within the project's scope are under local jurisdiction.
- T10. As presented in Table 2: Vehicular Crash Summary (2017-2021) of the TIAS, there were a total of 5 reported collisions involving non-motorists (bike and pedestrian). The collisions occurred at the Crafts Street intersections with Watertown Street and with Washington Street, as well as at the Washington Street intersection with Adams Street and Lewis Terrace. Since the proposed residential development is anticipated to increase non-motorized trips through these study area intersections, the Applicant should provide further detail on these incidents with vulnerable roadway users. Should the crash analysis be updated to reflect the most recent 5 years of crash data (as previously commented), then the Applicant should provide a description of those reported non-motorist collisions to help identify safety deficiencies and develop countermeasures.
- T11. As presented in the Pedestrian and Bicycle Facilities section of the TIAS, sidewalks and crosswalks are provided in the study area. The Applicant should provide an evaluation to determine if these pedestrian facilities are compliant with applicable Americans with Disabilities Act (ADA) and Federal Highway Administration (FHWA) requirements.
- T12. Based on field visits conducted on December 11, 2025, and the site walk on January 8, 2026, BETA observed vehicles queuing along Crafts Street from the Washington Street signalized intersection upstream past Lincoln Road during the weekday AM and PM peak periods (>550 feet). Crafts Street southbound motorists occasionally provided 'courtesy' gaps for minor street motorists to conduct their turns; however, the Crafts Street vehicle queue spilling back from Washington Street hindered the sightlines for Whole Foods exiting vehicles turning left from seeing Crafts Street northbound approaching vehicles (i.e., vehicles departing from the Washington Street intersection).

These Crafts Street southbound queues will remain in the future conditions with the proposed redevelopment project in place and may similarly have an impact on the ability for motorists to turn (left and right) from the proposed 36 Crafts Street driveway onto Crafts Street. The Applicant should develop safety measures for motorists exiting the 36 Crafts Street driveway onto Crafts Street.



*Image 1: Crafts Street Queue toward Washington Street
 (south of 36 Crafts Street driveway)*



*Image 2: Crafts Street Queue from Washington Street (north
 of 36 Crafts Street driveway)*



*Image 3: Vehicle Attempting to Turn from Whole Foods
 Driveway onto Crafts Street*

- T13. The Applicant should provide information regarding the existing crossing times and pedestrian delay at each study area intersection. This information is particularly important for the Watertown Street and Crafts Street intersection where two non-motorist crashes were reported and where school children walk to the nearby F.A. Day Middle School and Horace Mann Elementary School. This data is also important for the Washington Street intersections with Crafts Street and with Adams Street/Lewis Terrace where non-motorist collisions were reported and where people walk and ride bikes to the train station and bus stops.
- T14. The following should be noted for the Watertown Street and Crafts Street intersection:
- There are no pedestrian countdown signals.

- During field observations:
 - Vehicles had difficulty turning left from the Crafts Street northbound and southbound single-lane approaches during the permissive traffic signal phase due to the minimal gaps in the opposing traffic stream.
 - When a Crafts Street left-turning vehicle was stopped within the intersection (i.e., beyond the STOP bar and crosswalk) waiting for gaps, trailing motorists maneuvered around that stopped vehicle to complete their continued through or right-turning movements.
 - When more than one Crafts Street left-turning vehicle was stopped while waiting for gaps, the vehicle queue on that approach lengthened as trailing motorists could not complete their continued through or right-turning movements.



Image 4: Watertown Street and Crafts Street Intersection (Source: Google Maps)

T15. The following should be noted for the intersection of Washington Street intersections with Adams Street/Lewis Terrace and with Jackson Road:

- The signalized pedestrian crossings operate concurrently with traffic movements.
- There are no pedestrian countdown signals.
- For pedestrians to travel between the south side of Washington Street east of Jackson Road to the south side of Washington Street west of Lewis Terrace and to the west side of Lewis Terrace south of Washington Street, pedestrians need to:
 - Cross the Washington Street east leg of the Jackson Road intersection in a northerly direction,
 - Cross the Jackson Road leg in a westerly direction,
 - Cross the Adams Street leg in a westerly direction, and

- Cross the Washington Street west leg of the Adams Street/Lewis Terrace intersection in a southerly direction.
- A pedestrian worn path is present along the south side of Washington Street and the east side of Lewis Terrace suggesting that pedestrians choose the shortest travel route along the unpaved path.



Image 5: Pedestrian Facilities at the Washington Street Intersections with Adams Street/Lewis Terrace and with Jackson Road (Source: Google Maps)

NO-BUILD CONDITIONS

To estimate the impact of the proposed development's traffic on the adjacent roadway system, existing traffic volumes were projected to the year 2032. This design horizon represents a 7-year projection, which is in accordance with MassDOT guidelines. Future traffic volumes within the study area include existing traffic, new traffic due to normal traffic growth, and traffic related to any significant development by others expected to be completed by 2032. Consideration of these factors resulted in the development of 2032 No-Build traffic volumes, which assume that the proposed development is not built.

- T16. The methodology in determining the 7-year design horizon complies with Section 5 Chapter I.C.1 of MassDOT's TIA Guidelines. No action or response is required.

HISTORICAL TRAFFIC GROWTH

An annual average traffic-growth percentage was determined based on a review of traffic studies conducted in the City of Newton that showed a 1.0% annual growth rate was used in accounting for general growth and smaller area developments. In addition, MassDOT historical traffic count data prior to 2020 within the vicinity of the project were reviewed which showed traffic volume inconsistencies with increases and decreases. Therefore, a 1.0% annual growth rate was used in projecting future traffic volumes.

T17. Although the sources of the traffic studies used in determining the 1.0% annual traffic growth rate were not identified, BETA conducted a review of the January 2024 TIA prepared by Vanasse and Associates, Inc. (VAI) for the proposed multifamily residential development to be located at 78 Crafts Street. That traffic study showed that MassDOT permanent count stations in Newton and surrounding municipalities experienced a 0.64% average annual traffic growth rate, and a 1.0% compounded annual background growth rate was selected to account for future traffic growth and unforeseen development in the area.

In addition, BETA compared the 2025 Existing traffic volumes prepared for this development with the 2023 Existing traffic volumes documented within the January 2024 TIA prepared by VAI for the proposed multifamily residential development to be located at 78 Crafts Street and with the 2022 Existing traffic volumes developed within the April 2022 TIAS for the proposed elderly housing development to be located at 34-50 Crafts Street. This comparison revealed that traffic volumes have fluctuated between an annual decrease of 63 vehicles per hour to an annual increase of 50 vehicles per hour. These annual changes are not considered to be noticeable.⁴

Therefore, the use of the 1.0% annual background growth is reasonable. No action or response is required.

BACKGROUND (IN-PROCESS) DEVELOPMENTS

In addition to utilizing a historical growth rate, traffic to be generated by planned developments anticipated to add substantial traffic volumes through the study area within the design horizon was considered in developing the 2032 No-Build traffic volumes. Based on a review of the City's website, the vehicle trips to be generated by the following specific land development projects by others were included:

- 78 Crafts Street: 307-unit multifamily development.
- Newton Crossing (Dunstan East): redevelop 1149-1185 Washington Street to include 292 residential units and 8,000 square feet of commercial space.

The traffic volumes for these background developments were obtained from the traffic studies prepared for each project. Although not explicitly identified in the TIAS, the following sources appear to have been used in accounting for these background development trips:

- TIA, Proposed Multifamily Residential Development, 78 Crafts Street, Newton, MA, dated January 2025 and prepared by VAI.
- Program Modification Traffic Generation, Dunstan East, Newton, MA, dated June 3, 2021, and prepared by VHB.

T18. Based on coordination efforts with the City of Newton's Planning and Development Department staff, there is an approved 40B housing development to be located at the West Newton Armory (1135-1137 Washington Street) that should also be included within the TIAS for the 38 Crafts Street project in developing the 2032 No-Build traffic conditions. The Applicant should coordinate with City officials to obtain the relevant traffic study prepared for the West Newton Armory development and update the future traffic volumes accordingly.

⁴ As previously noted within this peer review letter, ITE and MassDOT methodologies suggest that an increase of 100 vehicles per hour at an intersection is considered to be noticeable.

ROADWAY IMPROVEMENTS BY OTHERS

As part of the 2032 No-Build traffic conditions, planned roadway improvements were considered within the study area. The City Council approved the Washington Street Vision Plan in December 2019, but there are no immediate plans to implement any of the suggested improvements within the study area. Therefore, no improvements from the Washington Street Vision Plan were included within the 2032 No-Build traffic conditions.

The mitigation measures proposed as part of the 78 Crafts Street multifamily development included vehicle and non-motorized improvements. As noted within the Zoning Board of Appeals Decision on the 78 Crafts Street development, the Applicant is required to implement sidewalk, bicycle, pedestrian, and accessibility improvements in the area bordered by Watertown Street, Adams Street, Walnut Street, and Washington Street. The intent of these improvements is to help provide for an enhanced and safer pedestrian experience by replacing sections of broken or missing sidewalks, adding new crosswalks, and adding curb ramps and tactile surfaces. Traffic calming measures would be incorporated along Adams Street and Crafts Street, and rectangular rapid flashing beacons (RFFBs) would be installed along Watertown Street at Linwood Avenue, Nevada Street, and Faxon Street; on Pearl Street at Green Street; on Walnut Street at Crafts Street; and on Hawthorn Street at Pelligrini Park.

In addition, traffic signal and pedestrian improvements would be implemented at following intersections. The intersection operations under the 2032 traffic volume conditions incorporate the traffic signal improvements proposed as part of the 78 Crafts Street development.

- Crafts Street and Watertown Street
- Crafts Street and Washington Street
- Washington Street, Adams Street, and Lewis Terrace
- Washington Street and Jackson Road

T19. Based on BETA's coordination efforts City of Newton's Planning and Development Department staff, no other planned roadway improvements should be included within the 2032 design horizon for the 38 Crafts Street development. No action or response is required.

T20. The Applicant should ensure that the mitigation measures committed to as part of the 78 Crafts Street multifamily development will not impact the design of the pedestrian loading zone, sidewalks, or other changes proposed as part of the 38 Crafts Street development (e.g., traffic calming measures, new crosswalks, upgraded sidewalks, curb ramps, and tactile surfaces). Accordingly, the Applicant should update the site plans and off-site improvement plans to depict mitigation measures associated with the 78 Crafts Street multifamily development.

BUILD CONDITIONS

As proposed, the existing structures on the site will be razed and 234 multifamily residential units will be constructed in a six-story building with a 6-story garage. The five existing driveways on Crafts Street would be consolidated into a single driveway that would provide access to a gated parking garage. In addition, the two existing driveways on Court Street (one wide curb cut) would be merged, creating an exit-only driveway from the parking garage.

TRIP GENERATION

BASELINE VEHICLE TRIPS

Project-generated traffic volumes were determined by utilizing trip-generation statistics published in the ITE Trip Generation Manual (12th edition) using Land Use Code 221: Multifamily Housing (Mid-Rise) in a general urban/suburban setting and not close to rail transit.⁵ The TIAS estimated that the development would generate 1,048 total trips (524 entering and 524 exiting) on a typical weekday, 91 total trips (21 entering and 70 exiting) during the weekday AM peak hour, and 87 total trips (56 entering and 31 exiting) during the weekday PM peak hour.

T21. This ITE trip-generation methodology complies with Section 3 Chapter V of MassDOT's TIA Guidelines. No action or response is required.

T22. Based on traffic counts collected at the existing site driveways, the site currently generates 22 total vehicle trips (18 entering and 4 exiting) during the weekday AM peak hour and 13 total vehicle trips (5 entering and 13 exiting) during the weekday PM peak hour. The difference in the site trips for the existing uses and the proposed development is summarized in Table 7 of the TIAS. As shown, the development was estimated to result in an increase in new trips in the range of 47 to 53 vehicles per hour during the weekday commuting peak hours. To provide a conservative (worse-case) scenario, the TIAS did not take credit for the existing site trips.

In addition, the existing uses generate bus and truck trips are anticipated to be more than for the proposed residential development. In general, these types of existing larger vehicles occupy more space and move slower than automobiles because of their size, weight, and different operating dynamics that reduce overflow and capacity (e.g., require longer gaps in the mainline traffic stream, slower acceleration and deceleration, etc.). No action or response is required.

PERSON TRIPS

As detailed within the ITE Trip Generation Handbook,⁶ adjustments to the trip-generation calculations may be necessary because trips to multimodal sites often have different mode shares (e.g., automobile trips, pedestrian trips, bicycle trips, and transit trips). Accordingly, trip-generation estimates should account for each person entering and exiting the site. ITE methodologies recommend the following steps:

- Estimate the vehicle trips to be generated for the proposed development based on data published in the ITE Trip Generation Manual or other acceptable source.
- Convert the estimated baseline vehicle trips to person trips by multiplying by a vehicle occupancy rate.
- Distribute the estimated person trips for each of the applicable transportation modes.
- Convert the adjusted person trips for automobiles to adjusted vehicle trips by dividing by the vehicle occupancy rate.

⁵ Institute of Transportation Engineers. Trip Generation Manual, 12th ed. Washington, DC, 18 Aug. 2025.

⁶ Institute of Transportation Engineers. Trip Generation Handbook, 3rd ed. Washington, DC, Sept. 2017.

As described within the TIAS, the ITE baseline vehicle trips were converted to person trips to be able to estimate the modal share of site trips. The 2022 National Household Survey data published by the United States Department of Transportation (USDOT) and FHWA were used that determined that an average vehicle occupancy rate of 1.08 for residential uses.

- T23. The Applicant should confirm if the vehicle occupancy rate of 1.08 was obtained from Table 5-2: Average Vehicle Occupancy for Selected Trip Purposes from the Summary of Travel Trends: 2022 National Household Survey for trips to and from work in 2022. If this method was used, the Applicant should clarify why the vehicle occupancy rates were not considered for "Other Family/Personal Errands" trip purposes (1.60), for "Social and Recreational" trips purposes (1.99), or for "All Trips" (1.52).

MODE SHARE USE

As described within the TIAS, the person trips were distributed into all applicable transportation modes based on American Community Survey 5-Year Estimates data published by the United States Census Bureau for the study area (Census Tract No. 3733). The data presented in the traffic study shows the following mode share percentages. The mode share distributions were applied to the person trips to reflect the number of people using each of these three transportation modes entering and exiting the proposed development.

- Vehicle = 75%
- Transit = 17%
- Bike/Walk = 8%

- T24. BETA's review of the mode share data on the United States Census Bureau website shows different mode share splits (Means of Transportation to Work) than used within the TIAS (83% vehicle, 12% transit, and 5% bike/walk) which would result in more vehicle site trips than evaluated. The Applicant should submit the mode share data referenced from United States Census Bureau's American Community Survey 5-Year Estimates. Should the mode share distributions need to be changed from those used within the traffic study, then the Applicant may need to update the trip-generation estimates, the 2032 Build traffic volumes, and the associated intersection operational analyses.

- T25. As documented within the Public Transportation section of the TIAS, there are Massachusetts Bay Transportation Authority (MBTA) public transportation services available in proximity to the proposed residential development (Framingham/Worcester Commuter Rail Line, and Bus Routes 59, 553, 554, 556, and 558). Since the mode share of residential trips documented within the TIAS suggests 17% of the proposed site trips may typically use transit, the Applicant should provide ridership information for the nearby commuter rail and bus routes to assess whether the existing services have the capacity to add additional passengers.

- T26. The Applicant should clarify if residents will be incentivized in taking the commuter rail line to access Boston area job. For example, the Applicant should describe whether residents will be provided with Commuter Rail tickets or Zone 1 Commuter Rail monthly passes.

ADJUSTED VEHICLE TRIPS

The person trips using automobiles were converted back to vehicle trips (adjusted vehicle trips) by applying a local vehicle occupancy rate of 1.06 for residential uses.

- T27. The Applicant should clarify why a vehicle occupancy rate of 1.08 was used in converting the ITE baseline vehicle trips to person trips, but a vehicle occupancy rate of 1.06 was used in converting person trips back to vehicle trips.

TRIP DISTRIBUTION

Site trips were assigned to the study area intersections based on United States Census Bureau Journey-to-Work data with the place of residency the City of Newton. These distribution patterns were then adjusted based on the existing traffic patterns within the study area reflected on a Gravity Model presented in the Appendix of the TIA.

- T28. The Applicant should clarify if the United States Census Bureau Journey-to-Work data was used from the entire City of Newton as the place of residency or if the data was used from Census Tract No. 3733 as the place of residency (similar to the mode share methodology).
- T29. The Applicant should provide a narrative of the distribution of proposed pedestrian and bicycle site trips throughout the study area. In addition, the Applicant should provide a figure of the study area intersections depicting the pedestrian and bicycle travel routes and peak hour site trips (similar to Figures 9 and 10 that depict the traffic volumes).
- T30. As requested during the site walk on January 8, 2026, concerns were raised with delivery vehicles traveling from the site through the Court Street neighborhood. The Applicant should identify how delivery vehicles will access the site (enter and exit), when deliveries would be made, and how many delivery vehicle trips are projected.

SITE ACCESS

SITE ACCESS DESIGN AND USAGE

Court Street currently provides one-way eastbound travel between Central Avenue in the west and Whole Foods in the east. To the west of Whole Foods, Court Street also extends to the south as a one-way southbound roadway between 21 Court Street and Washington Street (Court Street [South]). As shown on Sheet C 6.00: Layout and Materials Plan, the single-family homes at 19 and 21 Court Street will be razed and the existing driveway for 36 Crafts Street will be redesigned and extended to provide a connection between Court Street in the west and Crafts Street in the east (aka, 36 Crafts Street driveway). Access to the site would be provided for a structured parking garage along the north side of the 36 Crafts Street driveway.

- The 36 Crafts Street driveway would provide two-way vehicle flow between Crafts Street and the proposed parking garage site driveway (i.e., the roadway segment to the east of the proposed parking garage driveway).
 - Vehicles traveling westbound along the 36 Crafts Street driveway from Crafts Street would be able to turn right into the parking garage driveway and would be able to proceed to the Court Street and Court Street (South) intersection.
 - Vehicles exiting the parking garage driveway would be able to turn left onto the 36 Crafts Street driveway eastbound toward Crafts Street and would be able to turn right onto the 36 Crafts Street driveway westbound toward the Court Street and Court Street (South) intersection.
- The 36 Crafts Street driveway would change to one-way westbound traffic flow between the proposed parking garage site driveway and Court Street (South).

- The 36 Crafts Street driveway would intersect Court Street and Court Street (South) as the north leg, be under STOP-sign control, and provide one-way travel approaching the intersection.
 - Vehicles traveling westbound along 36 Crafts Street driveway from the parking garage driveway would only be able to proceed through onto Court Street (South) toward Washington Street.
 - Vehicles traveling along Court Street eastbound would only be able to turn right onto Court Street (South) toward Washington Street and be restricted from entering the 36 Crafts Street driveway.
- T31. Based on a review of Sheet C 6.00: Layout and Materials Plan, a note is provided that there will be a sidewalk across the 36 Crafts Street driveway at the intersection with Crafts Street. The Applicant should clarify if this note refers to a proposed "crosswalk."
- T32. During a meeting held with City officials and the development team on January 13, 2026, the Applicant clarified that the 36 Crafts Street driveway will not be a public way between Crafts Street and Court Street for non-site vehicles. The Applicant should identify proposed measures to discourage non-site vehicles from using the 36 Crafts Street driveway as a cut-through connection (from Crafts Street to Court Street).
- T33. During the meeting held with City officials and the development team on January 13, 2026, the Applicant stated that the 36 Crafts Street driveway will be open to the public for walking and biking between Crafts Street and Court Street. The Applicant should discuss measures to accommodate bicycle travel between Court Street and Crafts Street as cyclists will travel counterflow with vehicles in the one-way westbound section of the 36 Crafts Street driveway (i.e., between Court Street and the parking garage driveway).

As presented on Sheet C 6.00: Layout and Materials Plan, the intersection of Court Street, the 36 Crafts Street driveway, and Court Street (South) would be designed with:

- The 36 Crafts Street driveway as the north leg, allowing southbound one-way approaching travel only onto Court Street (South) toward Washington Street, and under STOP control,
 - Court Street as the west leg, allowing eastbound one-way approaching travel only for right turns onto Court Street (South) toward Washington Street, and under STOP control,
 - Court Street (South) as the south leg and allowing one-way southbound departing travel only toward Washington Street, and
 - A STOP sign (R1-1), a No Right Turn sign (R3-1), a Do Not Enter sign (R5-1), and a One-Way sign (R6-1L) will be posted on the 36 Crafts Street driveway.
- T34. During the site walk on January 8, 2026, concerns were raised with motorists traveling the wrong direction within the Court Street one-way roadway system. In addition to signage and striping, the Applicant should propose other measures to discourage motorists from exiting the 36 Crafts Street driveway onto Court Street westbound and for Court Street eastbound motorists from turning left onto the 36 Crafts Street driveway (e.g., raised infrastructure on the northwest corner of the proposed intersection).
- T35. As shown on Sheet C 6.00: Layout and Materials Plan, a sidewalk will be provided along the north side of the 36 Crafts Street driveway that would connect with the existing sidewalk

along the north side of Court Street at the proposed intersection. With the Court Street eastbound approach proposed to be placed under STOP sign control and an existing sidewalk provided along the west side of Court Street (South), the Applicant should evaluate the installation of a crosswalk across the Court Street leg of the intersection to provide pedestrian connectivity through the intersection.

- T36. The Court Street, 36 Crafts Street driveway, and Court Street (South) intersection will represent a new/redesigned intersection with added traffic volumes to the area. The Applicant should conduct intersection operational analyses for the Court Street, 36 Crafts Street driveway, and Court Street (South) intersection. In addition, the analysis should include facilities to accommodate pedestrians and bicycles.

As presented within Section 5.1.8.D.1: Design of Parking Facilities over 5 Stalls – Entrance and Exit Driveways of the City of Newton's Zoning Ordinance, entrance and exit driveways are required to be a minimum of 12 feet wide for one-way use only and a minimum of 20 feet wide for two-way use.

- T37. As shown on Sheet C 6.00: Layout and Materials Plan, the proposed 36 Crafts Street driveway will be 20 feet wide within the two-way portion (i.e., between the proposed parking garage driveway and Crafts Street), the proposed 36 Crafts Street driveway will be 14 feet wide within the one-way westbound portion (i.e., between the proposed parking garage and Court Street), and the proposed parking garage driveway will be 20 feet wide. This design meets the City's Zoning Ordinance. No action or response is required.
- T38. The Applicant should provide dimensions on the plans for the 36 Crafts Street driveway at the intersections with Crafts Street and with Court Street/Court Street (South) to determine conformance with Chapter 5.1.8.D.1: Design of Parking Facilities over 5 Stalls – Entrance and Exit Driveways of the City's Zoning Ordinance.

As per Section 5.1.12.D.3: Off-Street Loading Requirements – Location and Design of the City of Newton's Zoning Ordinance, driveways shall be graded, surfaced, and suitably maintained to the satisfaction of the City Engineer and avoid nuisances of dust, erosion, or excessive water flow across public ways. The Applicant requested a waiver from Section 5.1.12.D.3 in compliance with Section 5.1.13: Exceptions of the City's Zoning Ordinance in which a waiver may be granted when strict compliance is impracticable due to factors such as the nature of the use, lot characteristics, public interest, safety, or environmental protection.

- T39. The Applicant should provide support for this waiver as the City Engineer ensures driveways are properly graded, surfaced, and maintained to meet City standards, ensuring safe and efficient operation while preventing dust, erosion, and excessive water flow.

LOADING ZONE

A loading zone will be provided along the north side of the 36 Crafts Street driveway between the proposed parking garage site driveway and Crafts Street. Based on clarification provided from VHB to the City of Newton's the Deputy Chief Planner on December 15, 2025, the loading zone will support the residents' needs and minimize impact on the public roadways. The design is intended to accommodate building maintenance activities, such as delivery vehicles for trash, recycling, and resident move-in and move out operations.

- T40. The Applicant should provide a narrative of the anticipated loading zone operations along the 36 Crafts Street driveway (e.g., will there be time of day restrictions on the use of the zone,

will there be length of stay [duration] limits on the use of the zone, how often would the zone be used [frequency], what happens to a vehicle on the 36 Crafts Street driveway waiting to enter the zone if the zone is already occupied by other vehicles, will vehicles within the loading zone be able to make a U-turn when exiting destined for Crafts Street, etc.).

- T41. The Applicant should provide turning movement plans to demonstrate that design vehicles can clearly enter and exit the proposed loading zone along the north side of the 36 Crafts Street driveway by staying within designated lanes or boundaries.
- T42. As shown on Sheet C 6.00: Layout and Materials Plan, No Parking Passenger Loading Zone signs (SP-2L and SP-2R) will be posted along the north side of the 36 Crafts Street driveway within the dedicated loading zone. Since the signs indicate that this loading zone will be for passengers, the Applicant should clarify if this loading zone will be for passengers or for building maintenance activities.
- T43. The Applicant should clarify if parking will be allowed along the 36 Crafts Street driveway outside of the loading zone.

As per Section 5.1.12.B.1: Off-Street Loading Requirements – Applicability of the City’s Zoning Ordinance, an application for a permit for the erection of a new building or the development of land shall not be approved without a plan for off-street loading facilities. The Applicant requested a waiver from Section 5.1.12.B.1. Similarly, Section 5.1.5: Administration of the City’s Zoning Ordinance requires a loading plan to be submitted to the Commissioner of Inspectional Services for any loading facility. The Applicant requested a waiver from Section 5.1.5: Administration in compliance with Section 5.1.13: Exceptions of the City’s Zoning Ordinance in which a waiver may be granted when strict compliance is impracticable due to factors such as the nature of the use, lot characteristics, public interest, safety, or environmental protection.

As per Section 5.1.12.D.1: Off-Street Loading Requirements – Location and Design of the City’s Zoning Ordinance, each loading bay shall not be less than 10 feet in width, 35 feet in length, and 12 feet in height. In addition, maneuvering space shall be located entirely on the lot with immediate and direct ingress to the building intended to be served. As depicted on Sheet C 6.00: Layout and Materials Plan, the loading bay is shown to be 8 feet in width and 42 feet in length. Therefore, the Applicant requested a waiver from Section 5.1.12.D.1 to reduce the width of the loading bay.

As per Section 5.1.12.D.3: Off-Street Loading Requirements – Location and Design of the City of Newton’s Zoning Ordinance, loading areas shall be graded, surfaced, and suitably maintained to the satisfaction of the City Engineer and avoid nuisances of dust, erosion, or excessive water flow across public ways. The Applicant requested a waiver from Section 5.1.12.D.3 in compliance with Section 5.1.13: Exceptions of the City’s Zoning Ordinance in which a waiver may be granted when strict compliance is impracticable due to factors such as the nature of the use, lot characteristics, public interest, safety, or environmental protection.

The Applicant also requested that City Council grant relief under Section 5.1.13: Exceptions for other necessary or appropriate waivers to related to the submitted plans.

- T44. Since the proposed loading zone will be 8 feet wide instead of 10 feet as per the City’s Ordinance, the Applicant should clarify if there are restrictions on the size of truck allowed to use the loading zone.
- T45. The Applicant should provide support for these waivers. Should the waivers not be granted:

- a. The Applicant should prepare and submit a plan for the off-street loading facility that complies with Section 5.1.12 and Section 5.1.5 of the City's Zoning Ordinance to ensure the loading area is properly graded, surfaced, and maintained to meet City standards, ensuring safe and efficient operation while preventing dust, erosion, and excessive water flow.
- b. The Applicant should revise the plan to conform with the City's requirements for the loading zone dimensions.

PASSENGER LOADING ZONE

As presented on Sheet C 6.00: Layout and the Materials Plan, there will be a 66-foot-wide passenger loading zone provided along the west side of Crafts Street. As shown on the Floor and Garage Plans, this passenger loading area would provide direct access to the main entrance of the residential structure. The passenger loading area would be signed for No Parking and with a length of stay limited to 15 minutes.

Based on clarification provided from VHB to the City of Newton's the Deputy Chief Planner on December 15, 2025, the passenger loading zone will primarily accommodate short-term passenger pick-up and drop-off activities (e.g., rideshare, taxi, etc.) as well as for short-term loading and deliveries (e.g., Amazon, Uber Eats, etc.).

- T46. The Applicant should provide a narrative of the anticipated passenger loading zone operations along Crafts Street (e.g., will there be time of day restrictions on the use of the zone, how often would the zone be used [frequency], what happens to a vehicle on Crafts Street waiting to enter the zone if the zone is already occupied by other vehicles, how will Crafts Street northbound vehicles enter the passenger loading zone, will vehicles within the passenger loading zone be able to make a U-turn when exiting destined for Crafts Street northbound, etc.).
- T47. As shown on Sheet C 6.00: Layout and Materials Plan, there will be No Parking Loading Zone 15 Minute Limit signs (SP-1L and SP-1R) posted along the west side of Crafts Street within the dedicated passenger loading zone. Since the passenger loading zone will be limited to a 15-minute time limit, the Applicant should describe the process and the party responsible for the monitoring and enforcing the time restricted passenger loading zone.
- T48. As shown on Sheet C 6.00: Layout and Materials Plan, the proposed passenger loading zone appears to be located within the Crafts Street right-of-way. Accordingly, the Applicant will require City approval for this amenity.
- T49. Due to the proximity of Lincoln Road on the east side of Crafts Street and the proposed passenger loading zone on the west side of Crafts Street, the Applicant should provide turning movement plans to demonstrate that design vehicles can clearly enter and exit the proposed passenger loading zone by staying within designated lanes or boundaries. In addition, the turning movement plans should depict a left-turning design vehicle exiting Lincoln Road without encroaching into on-coming Crafts Street vehicles and into design vehicles waiting within the passenger loading zone.

Similar to the comments provided for the Loading Zone along the 36 Crafts Street driveway:

- Section 5.1.12.D.1: Off-Street Loading Requirements – Location and Design: each loading bay shall not be less than 10 feet in width, 35 feet in length, and 12 feet in height (Section 5.1.12.D.1: Off-Street Loading Requirements – Location and Design). In addition,

maneuvering space shall be located entirely on the lot with immediate and direct ingress to the building intended to be served.

- As depicted on Sheet C 6.00: Layout and Materials Plan, the passenger loading bay is shown to be 8 feet in width and 66 feet in length.
 - The Applicant requested a waiver from Section 5.1.12.D.1 related to the width of the passenger loading bay.
 - Section 5.1.12.D.3: Off-Street Loading Requirements – Location and Design: loading areas shall be graded, surfaced, and suitably maintained to the satisfaction of the City Engineer and avoid nuisances of dust, erosion, or excessive water flow across public ways.
 - The Applicant requested a waiver from Section 5.1.12.D.3 in compliance with Section 5.1.13: Exceptions of the City's Zoning Ordinance in which a waiver may be granted when strict compliance is impracticable due to factors such as the nature of the use, lot characteristics, public interest, safety, or environmental protection.
 - Section 5.1.12.B.1: Off-Street Loading Requirements – Applicability and Section 5.1.5: Administration for the submittal of a plan for off-street loading facilities.
 - The Applicant requested a waiver from Section 5.1.12.B.1: Off-Street Loading Requirements – Applicability and Section 5.1.5: Administration in compliance with Section 5.1.13: Exceptions of the City's Zoning Ordinance in which a waiver may be granted when strict compliance is impracticable due to factors such as the nature of the use, lot characteristics, public interest, safety, or environmental protection.
- T50. The Applicant should provide support for these waivers. Should the waivers not be granted:
- a. The Applicant should prepare and submit a plan to the City Engineer for the passenger loading facility that complies with Section 5.1.12 and Section 5.1.5 of the City's Zoning Ordinance to ensure the passenger loading area is properly graded, surfaced, and maintained to meet City standards, ensuring safe and efficient operation while preventing dust, erosion, and excessive water flow.
 - b. The Applicant should revise the plan to conform with the City's requirements for the passenger loading zone dimensions.

VEHICLE SPEED DATA

In compliance with Section 3 Chapter II.H of MassDOT's TIA Guidelines, vehicle speed data were collected along Crafts Street south of Lincoln Road (in proximity to the proposed 36 Crafts Street driveway) and used as part of a safety review and a sight distance assessment. The speed limit along Crafts Street is posted at 25 miles per hour (mph). Based on speed data collected along Crafts Street, average vehicle speeds (i.e., the sum of the speeds divided by the number of observations) in the northbound direction were found to be 29 mph and in the southbound direction were found to be 28 mph, which are higher than the posted speed limit. The 85th percentile speed generally indicates the speed that most drivers consider safe and reasonable under ideal conditions. The 85th percentile speeds along Crafts Street northbound (33 mph) and along Crafts Street southbound (31 mph) were observed to be higher than the posted speed limit. The observed pace speeds (the 10-mph range of speed with the greatest number of observations) were found to be between 24-33 mph for northbound travel and between 23-32 mph for

southbound travel. The 85th percentile speeds were used as part of the sight distance evaluation as the higher speeds require longer sightlines.

- T51. The vehicle speed study was conducted in compliance with standard traffic engineering practice. No action or response is required.

SIGHT DISTANCES

To identify potential safety concerns associated with site access, sight distances have been evaluated at the proposed 36 Crafts Street driveway at Crafts Street to determine if the available sight distances for vehicles exiting the site meet or exceed the minimum distances required for approaching vehicles to safely stop. The available sight distances were compared with minimum requirements, as established by the American Association of State Highway and Transportation Officials (AASHTO).

- T52. A typographical error was identified within footnote 7 on page 42 that references AASHTO's A Policy on the Geometric Design of Highways and Streets (aka, the Green Book) dated 2013. The same error was provided in footnote "a" for Table 12: Sight Distance Summary. The current version of the Green Book (7th edition) is dated 2018. This identified error is clerical in nature and does not affect the validity of the sight distance evaluation or the overall findings of the TIAS. No action or response is required.

As described in the TIAS, the AASHTO desirable Intersection Sight Distance (ISD) is limited to and from the south of the proposed 36 Crafts Street site driveway due to the existing Whole Foods building. As noted within the traffic study, the available sightlines to and from the south of the proposed 36 Crafts Street driveway would exceed the AASHTO ISD measurement if the driver's eye of the minor street vehicle was set 10 feet back from the mainline traveled way instead of the 14.5 feet standard placement as per AASHTO methodologies.

- T53. Due to the limited sightlines documented for the proposed 36 Crafts Street site driveway at Crafts Street and the captured vehicle speeds (both average and 85th percentile) are higher than the posted speed limit, the Applicant should submit sight triangle plans for review. The sight triangle plans should depict the available sightlines, the required sight distances, and property lines to demonstrate whether motorists need to look through abutting properties to achieve the required sight distances.
- T54. The Applicant should conduct a sight distance evaluation for the proposed parking garage site driveway on the 36 Crafts Street driveway.
- T55. The Applicant should conduct a sight distance evaluation for the proposed intersection of Court Street, 36 Crafts Street driveway, and Court Street (South).
- T56. To ensure the safe and efficient flow of traffic to and from the site, the Applicant should commit to maintaining proposed plantings, vegetation, landscaping, and signing along the site frontage kept low to the ground (no more than 3.0 feet above street level) or set back sufficiently from the edges of the site driveways and along the mainline so as not to inhibit available sightlines.

INTERSECTION ANALYSES

Capacity analyses were performed for the study area intersections with the 2025 Existing, 2032 No-Build, and 2032 Build traffic volumes based on the methodology and procedures set forth in the Highway

Capacity Manual (HCM) for unsignalized intersections and based on the percentile delay method (Synchro software) for signalized intersections.

- T57. The Applicant should clarify why the percentile delay method was used in evaluating the signalized intersections instead of the HCM methodologies.
- T58. The Intersection Capacity Analyses section of the TIAS (Page 37) includes a statement that field observations indicate that drivers on the minor street approaches generally accept shorter gaps along the major roadway to safely enter, cross, or merge into the mainline traffic flow than those used in the computer model. Since the computer model uses longer accepted gaps than motorists experienced in the field, the delays reported in the traffic study for the study area unsignalized intersections are therefore overestimated (i.e., the delay increases the longer a minor street motorist waits before entering or crossing the mainline traffic stream). To support this statement, the Applicant should provide the critical gap study conducted in the field at the unsignalized intersections during the weekday AM and PM peak hours.
- a. Should the critical gaps captured in the field be noticeably less than the HCM methodology values, then the Applicant should revise the intersection operational analyses for the unsignalized intersections under the 2025 Existing, 2032 No-Build, and 2032 Build traffic volume conditions.
 - b. Should the critical gaps captured in the field not be noticeably less than the HCM methodology values or should the Applicant choose not to provide the critical gap data observed in the field, then this statement should be removed from the TIAS.
- T59. The intersection operational worksheets provided in the Appendix of the TIAS present the queue results in feet for the signalized intersections and the number of vehicles for the unsignalized intersections. The queue results presented in Table 11: Unsignalized Intersection Capacity Analysis Summary of the Traffic Impact and Access Study are shown in feet for the unsignalized intersections. The Applicant should confirm the methodology used in converting the analysis queue results from number of vehicles to feet for the unsignalized intersections.
- T60. Based on a comparison of the results presented in Table 10: Signalized Intersection Capacity Analysis Summary in the TIAS and on the capacity analysis worksheets provided in the Appendix, there appears to be transcribing errors for the Crafts Street southbound shared left-turn/through lane at Washington Street during the 2032 Build weekday AM peak hour condition.

The tabulated results have been copied from the Crafts Street southbound right-turn lane and applied to both the Crafts Street southbound shared left-turn/through lane and the Crafts Street southbound right-turn lane at the Washington Street intersection. The results provided on the capacity analysis worksheets provided in the Appendix show the following. As such, the Applicant should update Table 10 within the traffic study.

- a. $v/c = 1.11$ (instead of 0.26)
- b. Delay = 82 seconds (instead of 10 seconds)
- c. LOS F (instead of LOS B)
- d. 50th Percentile Queue = "~"248 feet (instead of 13 feet)
- e. 95th Percentile Queue = "#"629 feet (instead of 71 feet)

T61. As shown in Table 10: Signalized Intersection Capacity Analysis Summary in the TIAS and on the capacity analysis worksheets provided in the Appendix, the following lane groups were noted to experience 50th percentile queue results with the “~” symbol. The Synchro Studio 12 User Guide states the “~” symbol represents lane groups that experience conditions in which the traffic volume exceeds the capacity, the 50th percentile queue length is theoretically infinite, and blocking problems may occur. In these situations, the Synchro program does not account for the potential impact of downstream congestion on intersection operations nor detect for the impact of vehicles queues that overflow from exclusive turn lane with the through traffic. These include:

- a. 2025 Existing Conditions:
 - i. Crafts Street northbound approach at Watertown Street during the weekday PM peak hour.
 - ii. Crafts Street southbound shared left-turn/through lane at Washington Street during the weekday AM peak hour.
 - iii. Adams Street southbound shared left-turn/through lane at Washington Street during the weekday AM and PM peak hours.
- b. 2032 No-Build Conditions:
 - i. Washington Street westbound approach at Crafts Street during the weekday PM peak hour.
 - ii. Adams Street southbound shared left-turn/through lane at Washington Street during the weekday AM peak hour.
- c. 2032 Build Conditions:
 - i. Crafts Street southbound shared left-turn/through lane at Washington Street during the weekday AM peak hour (as shown on the Synchro worksheets).
 - ii. Washington Street westbound approach at Crafts Street during the weekday PM peak hour.
 - iii. Adams Street southbound shared left-turn/through lane at Washington Street during the weekday AM peak hour.
 - iv. Washington Street westbound through lanes at Jackson Road during the weekday PM peak hour.

The Applicant should provide support that this methodology is appropriate given these queue lengths with noted symbols or use a different software program accepted by MassDOT that would account for the potential impact of downstream congestion on intersection operations (e.g., SimTraffic).

T62. As shown in Table 10: Signalized Intersection Capacity Analysis Summary in the TIAS and on the capacity analysis worksheets provided in the Appendix, some lane groups were noted to experience 95th percentile queue results with the “#” symbol. The Synchro Studio 12 User Guide states the “#” symbol represents lane groups that experience conditions in which the traffic volume exceeds the capacity. If the reported volume-to-capacity ratio (v/c) is less than 1.00 for the specific lane group, then the method is valid for estimating the 95th percentile

queue. The following lane groups, however, were shown to have the “#” symbol and a v/c equal to or greater than 1.00:

- a. 2025 Existing Conditions:
 - i. Crafts Street southbound approach at Watertown Street during the weekday AM peak hour.
 - ii. Crafts Street northbound approach at Watertown Street during the weekday PM peak hour.
 - iii. Crafts Street southbound shared left-turn/through lane at Washington Street during the weekday AM and PM peak hours.
 - iv. Adams Street southbound shared left-turn/through lane at Washington Street during the weekday AM and PM peak hours.
- b. 2032 No-Build Conditions:
 - i. Crafts Street southbound shared left-turn/through lane at Washington Street during the weekday AM and PM peak hours.
 - ii. Washington Street westbound approach at Crafts Street during the weekday PM peak hour.
 - iii. Adams Street southbound shared left-turn/through lane at Washington Street during the weekday AM peak hour.
- c. 2032 Build Conditions:
 - i. Crafts Street southbound shared left-turn/through lane at Washington Street during the weekday AM (as shown on the Synchro worksheets) and PM peak hours.
 - ii. Washington Street westbound approach at Crafts Street during the weekday PM peak hour.
 - iii. Adams Street southbound shared left-turn/through lane at Washington Street during the weekday AM peak hour.

Since these lane groups experience v/c ratios at or above capacity and the 95th percentile queues are shown with a “#” symbol, the Applicant should provide support that this methodology is appropriate given these queue results with noted symbols or use a different software program accepted by MassDOT to evaluate the operations of these study area intersections (e.g., SimTraffic).

- T63. As previously noted, BETA conducted field visits on December 11, 2025. As observed in the field, vehicles queued along Crafts Street from the Washington Street signalized intersection past Lincoln Road during the weekday AM and PM peak periods. Since this existing condition currently blocks the Whole Foods driveways, Lenglen Road, and the 36 Crafts Street driveway, the Applicant should clarify if the computer model was calibrated for these unsignalized intersections to account for the blocking under existing and future traffic volume conditions.

ON-SITE PARKING AND INTERNAL CIRCULATION

The Applicant is requesting a waiver under Section 5.1.13: Exceptions of the City of Newton’s Zoning Ordinance, which allows exceptions to parking and loading requirements when strict compliance is

impracticable due to factors such as the nature of the use, lot characteristics, public interest, safety, or environmental protection. As outlined in Section C of the October 17, 2025, Summary of Relief and Waivers Requested and as shown on Sheet C 6.00: Layout and Materials Plan, the Applicant seeks relief from various provisions of Section 5.1: Parking and Loading to accommodate site-specific conditions and project needs.

NUMBER OF ON-SITE PARKING SPACES

As proposed, there will be an enclosed structured parking garage with 290 parking spaces provided for residents. Based on Section 5.1.4: Number of Parking Stalls of the City of Newton's Zoning Ordinance, 2 parking stalls per unit are required for multifamily dwellings. Accordingly, City's Zoning Regulations require 468 on-site parking stalls (234 units x 2 parking stalls). As allowed by Special Permit, the parking ratio could be reduced to 1.25 parking stalls per unit or to 1 parking stall per 2 low-income units. If the Special Permit is granted, then the City's Zoning Regulations require 293 on-site parking stalls (234 units x 1.25 parking stalls).

The Applicant requested a waiver from Section 5.1.4.A of the City's Zoning Regulations to provide 290 parking stalls instead of the minimum required 468 parking stalls (a reduction of 178 stalls) and instead of the 293 parking stalls as allowed by Special Permit (a reduction of 3 stalls).

- T64. Since the development program proposes 3 fewer parking stalls than allowed by Special Permit (290 stalls instead of 293 stalls), the Applicant should provide support for the further reduction in proposed on-site vehicle parking spaces beyond the Special Permit requirement to meet the anticipated parking demand by both residents and visitors.
- T65. The Applicant should provide information that would accommodate overflow parking if not enough parking were provided on-site for residents and visitors.
- T66. The Applicant should provide information on how many visitor parking spaces will be provided, where these spaces will be located, and how these spaces will be managed for short-term and long-term (including overnight) periods.
- T67. The Applicant should commit to monitoring on-street parking occupancy and utilization along adjacent roadways after project occupancy to measure impacts of the project on on-street parking. The Applicant should then review and coordinate with City officials to address and mitigate any identified parking impacts.

NUMBER OF ACCESSIBLE PARKING SPACES

In compliance with ADA requirements, the number of accessible parking spaces is determined by the total number of parking spaces for each parking lot.⁷ The 2010 ADA Standards for Accessible Design requires a minimum of 7 accessible parking spaces within a parking lot or facility with a 201-300 total parking spaces. Based on Section 5.1.8: Design of Parking Facilities over 5 Stalls of the City of Newton's Zoning Ordinance, a minimum of 3% but not less than 4 stalls are required to be designated as accessible parking spaces in a parking lot with 101-300 total parking spaces. For the 290 proposed on-site vehicle parking spaces, 9 of these spaces are required to be accessible. As shown on Sheet 20: Garage Plans dated September 2, 2025, and prepared by PCA, Inc., 9 accessible parking spaces are proposed in the on-site parking garage (4 accessible spaces on the Ground Floor and 1 accessible space on each of Levels 2 through 6).

⁷ <https://www.ada.gov/topics/parking/>

T68. The total number of proposed accessible parking spaces meets the ADA and City requirements. No action or response is required.

The 2010 ADA Standards for Accessible Design requires that at least 1 of every 6 accessible spaces be van accessible. For the 9 proposed accessible parking spaces, at least 1 space is required to be van accessible. As shown on Sheet 20: Garage Plans, 1 van accessible parking space is proposed on the Ground Floor of the on-site parking garage.

T69. The total number of van accessible parking spaces meets the ADA requirement. No action or response is required.

PARKING SPACE DESIGN

The applicant requested a waiver from Section 5.1.8: Design of Parking Facilities over 5 Stalls of the City of Newton's Zoning Ordinance for the following items:

- The parking stall depth is shown to be 18 feet, whereas the City requires 19 feet for angle parking (Section 5.1.8.B.2).
 - The accessible parking spaces are shown to be 9 feet wide and 18 feet deep, whereas the City requires accessible parking stalls to be at least 12 feet wide and at least 19 feet deep for angle parking (Section 5.1.8.B.4).
 - A minimum 5-foot-deep and 9-foot-wide maneuvering space is required for end stalls restricted on one or both sides by curbs, walls, fences, or other obstructions (Section 5.1.8.B.6). This maneuvering space is intended to provide a motorist with sufficient room to execute turns and safely exit the parking stall. As depicted on the Floor and Garage Plans, there appears to be obstructions for the two parking spaces on the Ground Floor near the Bike Parking Spaces – a wall separating the Bike Parking Spaces and the eastern parking stall, and a wall separating the western parking stall and two perpendicular spaces.
- T70. If a waiver is not granted, the Applicant should update the site plans to meet the City's minimum parking requirements for parking stall depth, the accessible parking stall width and depth, and parking stall abutting obstructions.
- T71. Based on a cursory review of the parking spaces depicted on the Floor and Garage Plans, the last parking stall located on the east side of the aisle within the Sixth Floor may be problematic for motorists reversing from the stall by backing southerly and then proceeding northerly down the ramp. The Applicant should submit a turning path plan demonstrating vehicles being able to reverse from this parking stall.

The parking layout was reviewed in accordance with MassHousing's January 2011 Handbook: Approach to Chapter 40B Design Reviews.⁸ A key component identified within the Parking and Access chapter of the Handbook is related to designing parking and on-site circulation to provide maximum pedestrian safety, ease in traffic flow, and access on the property. Some methods to consider include locating parking access to the side or rear where practicable, minimizing off-street parking adjacent to street frontage, and masking or hiding parking areas from the street frontage by buildings and/or landscaping. As documented within the TIAS, the proposed parking garage will be enclosed and "fully wrapped by the residential units."

⁸ <https://www.mass.gov/files/documents/2017/10/16/handbook-approachtoch40b-designreviewa.pdf>

- T72. The proposed off-street parking layout appears to meet these guidelines. No action or response is required.

PARKING SPACE LOCATION AND ASSIGNMENT

As per Section 5.1.8.A.2: Design of Parking Facilities over 5 Stalls – Setback Distances of the City of Newton's Zoning Ordinance, outdoor parking shall not be located within 5 feet of a building or structure containing dwelling units.

- T73. Based on a cursory review of the plans submitted with the application, all vehicle parking will occur within the on-site parking garage. The Applicant should clarify where the outside vehicle parking spaces will be located that are associated with this waiver.

As per Section 5.1.3.E: General Regulations of the City of Newton's Zoning Ordinance, parking stalls shall not be assigned to specific people or tenants. The Applicant requested a waiver from Section 5.1.3.E to allow for assigned parking stalls.

- T74. In general, an assigned parking space may remain vacant throughout the day when a resident is at work or a unit is vacant, whereas an unassigned parking stall allows for shared use as one parking space can serve different users throughout the day. The Applicant should provide support for this waiver to provide assigned parking spaces.

BICYCLE PARKING

There will be 94 bike racks provided on the site that include 84 secure bike racks within the parking garage and 10 outdoor bike racks. Based on Section 5.1.11: Bicycle Parking Facilities of the City of Newton's Zoning Ordinance, 1 bicycle parking space per 10 vehicle parking stalls is required when the parking facility proposes 20 or more vehicle parking stalls. This ratio results in 29 bike parking spaces (290 proposed vehicle parking stalls x 1 bicycle parking space/10 vehicle parking stalls). The Ordinance also states that no more than 30 bicycle parking spaces shall be required.

- T75. The proposed number of bicycle parking spaces meets the City's requirement. The Applicant should clarify how bicyclists will access the parking garage.

PEDESTRIAN AND BICYCLE CONNECTIVITY

As shown on Sheet C 6.00: Layout and Materials Plan, a sidewalk will be constructed along the north side of the 36 Crafts Street driveway from Court Street to Crafts Street, extend northerly along the west side of Crafts Street to the north-eastern portion of the site, and then be located along the northern area of the site (north of the proposed multi-family structure). As proposed in the TIAS, "*Pedestrian and bicycle access to the Site will be provided via Crafts Street in the east and Court Street in the southwest. A path running along the southern edge of the Site will connect Court Street with Crafts Street and the main entrance of the proposed building. This path will be open to all and will provide new connectivity between Crafts Street and the Court Street neighborhood.*"

- T76. The Applicant should clarify if the path will be for pedestrians and bicyclists, or if the path will be a sidewalk for pedestrians only.
- T77. The Applicant should confirm if the path will be ADA compliant and if curb ramps will be provided at the ends of the crosswalks across the driveways.

TRUCK ENCROACHMENT

As depicted on the Fire Access Plan (Sheet C 4.00) within the Site Plans, dated October 16, 2025, and prepared by VHB, the truck turning paths are shown to cross into opposing northbound travel lane for Crafts Street southbound right-turning vehicles entering the 36 Crafts Street driveway.

- T78. The Applicant should coordinate with the Newton Fire Department regarding access and circulation of fire trucks for this site.
- T79. The Applicant should provide turning movement plans to demonstrate that non-emergency vehicles can clearly make movements by staying within designated lanes or boundaries and not impacting on-street parking areas along Crafts Street.
- a. Non-emergency trucks entering and exiting the Crafts Street intersection with the 36 Crafts Street driveway.
 - b. Non-emergency trucks entering and exiting the Court Street, 36 Crafts Street driveway, and Court Street (South) intersection.
 - c. Design vehicles entering and exiting the proposed parking garage driveway on the 36 Crafts Street driveway, traveling through the parking garage, and exiting the site onto Crafts Street and onto the 36 Crafts Street driveway turning left and right.

MITIGATION MEASURES

PROPOSED IMPROVEMENTS

The Applicant has proposed to implement Transportation Demand Management (TDM) measures to minimize the traffic impacts on the adjacent roadway system. These measures are intended to offer alternatives to traveling in single occupancy vehicles by implementing the following:

- Display public transit schedules in a central location within the facility,
- Provide a map of the area for transit users that displays the location of Newtonville station, MBTA bus stops, sidewalks, and crosswalks, and
- Provide a secure bicycle storage area on the site.

T80. The Applicant should coordinate with Newton Planning and Development Department officials on the TDM elements and implementation efforts.

T81. The Applicant should commit to a monitoring program and coordinate with Newton Planning and Development Department officials on the specifics (method, duration, etc.).

ADDITIONAL IMPROVEMENTS

No other off-site safety or operational improvements were proposed within the TIAS.

T82. As detailed in Section 4 Chapter I.A of MassDOT's TIA Guidelines, the applicant is required to commit to a mitigation program if a proposed development "*adds vehicle trips to a facility that is already performing with poor operating characteristics (e.g., having at least one lane group and/or turning movement at or below LOS D in rural areas and LOS E in urban areas).*"

As presented in the TIAS, the following lane groups are projected to operate at LOS E or worse under 2032 No-Build conditions and the reported impacts with the 2032 Build traffic volumes. Accordingly, the Applicant should commit to improvement measures for these study area

intersections beyond those included in the 2032 No-Build conditions as part of the planned roadway improvements by others. The Applicant should coordinate with Newton Planning and Development Department officials for the consideration of specific improvements at these locations.

- Whole Foods driveway eastbound approach to Crafts Street and Lenglen Road:
 - 2032 No-Build weekday PM peak hour: LOS E.
 - 2032 Build weekday PM peak hour: 4 seconds of increased delay, 7 feet of increased vehicle queue, and 3% less capacity available (v/c drops from 0.58 to 0.61).
- Washington Street, Crafts Street, and Santander Bank driveway:
 - Crafts Street southbound shared left-turn/through lane:
 - 2032 No-Build weekday AM peak hour: LOS F.
 - 2032 Build weekday AM peak hour: LOS F, 43 feet of increased average vehicle queue, 43 feet of increased 95th percentile vehicle queue length, and 7% less capacity available (v/c drops from 1.04 to 1.11).
 - 2032 No-Build weekday PM peak hour: LOS F.
 - 2032 Build weekday PM peak hour: LOS F, 10 seconds of increased delay, 6 feet of increased average vehicle queue, 15 feet of increased 95th percentile vehicle queue length, and 3% less capacity available (v/c drops from 1.09 to 1.12).
 - Washington Street westbound approach:
 - 2032 No-Build weekday PM peak hour: LOS F.
 - 2032 Build weekday PM peak hour: LOS F, 6 seconds of increased delay, 8 feet of increased average vehicle queue, 12 feet of increased 95th percentile vehicle queue length, and 2% less capacity available (v/c drops from 1.17 to 1.19).
 - Overall Intersection:
 - 2032 No-Build weekday PM peak hour: LOS E.
 - 2032 Build weekday PM peak hour: LOS F and 5 seconds of increased delay.
- Washington Street, Adams Street, and Lewis Terrace:
 - Washington Street eastbound approach:
 - 2032 No-Build weekday AM peak hour: LOS E.
 - 2032 Build weekday AM peak hour: LOS E, 2 seconds of increased delay, 10 feet of increased average vehicle queue, 35 feet of increased 95th percentile vehicle queue length, and 2% less capacity available (v/c drops from 0.90 to 0.92).
 - 2032 No-Build weekday PM peak hour: LOS E.
 - 2032 Build weekday PM peak hour: LOS E, 2 seconds of increased delay, 4 feet of increased average vehicle queue, 15 feet of increased 95th percentile vehicle queue length, and 2% less capacity available (v/c drops from 0.89 to 0.91).

- Lewis Terrace northbound shared left-turn/through lane:
 - 2032 No-Build weekday AM peak hour: LOS F.
 - 2032 Build weekday AM peak hour: no changes to LOS, delay, or vehicle queues.
 - 2032 No-Build weekday PM peak hour: LOS E.
 - 2032 Build weekday PM peak hour: no changes to LOS, delay, or vehicle queues.
- Adams Street southbound shared left-turn/through lane:
 - 2032 No-Build weekday AM peak hour: LOS F.
 - 2032 Build weekday AM peak hour: no changes to LOS, delay, or vehicle queues.
 - 2032 No-Build weekday PM peak hour: LOS E.
 - 2032 Build weekday AM peak hour: no changes to LOS, delay, or vehicle queues.
- Washington Street eastbound approach to Jackson Road:
 - 2032 No-Build weekday AM peak hour: LOS E.
 - 2032 Build weekday AM peak hour: LOS E and 1% less capacity available (v/c drops from 0.76 to 0.77)

- T83. In addition to these above listed conditions in which the future No-Build traffic volumes result in LOS E or worse operations and site trips are projected to be added to those intersections, the Washington Street westbound through lanes at Jackson Road operate at LOS D during 2032 No-Build weekday PM peak hour traffic volumes and will degrade to LOS E, increase delay by 7 seconds, increase the average vehicle queue by 18 feet, increase the 95th percentile queue by 15 feet, and provide 2% less available capacity (v/c drops from 0.96 to 0.98). The Applicant should coordinate with Newton Planning and Development Department officials for the consideration of specific improvements at this location.
- T84. As detailed within this traffic peer review, vehicle queues along Crafts Street extend from the Washington Street signalized intersection past Lincoln Road. The Applicant should coordinate with Newton Planning and Development Department officials to identify appropriate safety and operational measures for motorists exiting the 36 Crafts Street driveway onto Crafts Street.
- T85. As detailed within the Study Area section of the TIAS, a STOP sign is missing from the Maguire Court approach at the Crafts Street and Clinton Street unsignalized intersection. The Applicant should coordinate with Newton Planning and Development Department officials for the placement of the STOP sign facing the Maguire Court approach.
- T86. The crosswalks across Crafts Street nearest to the site are located at the Ashmont Avenue unsignalized intersection (+/- 690 feet to the north of the proposed passenger loading zone) and at the Washington Street signalized intersection (+/- 550 feet to the south of the proposed passenger loading zone). The Applicant should coordinate with Newton Planning and Development Department officials to identify a pedestrian crossing closer to the site as pedestrians may not walk these distances to cross Crafts Street if destined for places such as Newton School for Children, Dearborn Academy, Clearway School, or other locations accessed via the roadways along the east side of Crafts Street. Consideration should be given to the

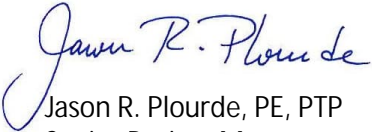
Cat Kemmett, Deputy Chief Planner
January 20, 2026
Page 29 of 29

speeds of vehicles traveling along Crafts Street (posted speed = 25 mph, 85th percentile speeds = 31-33 mph) related to the placement and design of any pedestrian crossings of Crafts Street.

T87. As the project proceeds, the Applicant should develop a transportation management plan to minimize construction traffic impacts to abutters and residents.

Please contact us if we can be of any further assistance regarding this matter.

Very truly yours,
BETA Group, Inc.



Jason R. Plourde, PE, PTP
Senior Project Manager

cc: Jeffrey Maxtutis – BETA Group, Inc.

Job No: 117587.02

CITY OF NEWTON
Department of Public Works
ENGINEERING DIVISION

MEMORANDUM

To: Barney Heath, Director of Planning & Development

From: John Daghlian, Associate City Engineer

Re: Comprehensive Permit – 25-1 ~ 38 Crafts Street

Date: November 14, 2025

CC: Jennifer Caira, Deputy Director
Alfredo Vargas, PE City Engineer
Katie Whewell, Chief Planner
Brenda Belsanti, ZBA Clerk

In reference to the above site, I have the following comments for a plan entitled:

*38 Crafts Street
Crafts & Court Street
Newton, MA
Prepared by: VHB
Latest Issued: October 16 , 2025
&
Drainage Report and O&M Plan*

Executive Summary:

This project entails the demolition of 2 existing residential dwellings and two (2 story commercial) buildings, and a couple of office trailers for the construction of a six-story multi-family residential tower. The site consists of 2.7 acres located on 7 parcels, that has frontage on both Crafts & Court Streets. The Engineering Division would request that the existing conditions plan be produced at a larger scale to clearly delineate City Easement and utilities specifically along the western, southern, and northern property lines.

If this permit is approved an Approval Not Required [ANR] plan will be required in accordance with Massachusetts General Laws Chapter 41 Section 81P requiring the multiple separate lots to be combined into one contiguous lot.

The overall site is bound by Crafts Street (a 50-foot public right of way) to the east & residential & commercial use, commercial property to the south and Court Street (a 40-foot-wide public way) & residential dwellings, to the west (a City Drian Easement) and residential units, and residential use to the north. Being a relatively flat site, it has a high point elevation at approximately 39 feet southern property line and gently slopes to the north having a low point elevation of 37 feet. The site has a few catch basins, but it is unclear if they are functioning or if they are connected to the City drainage system or simply leaching type of basins.



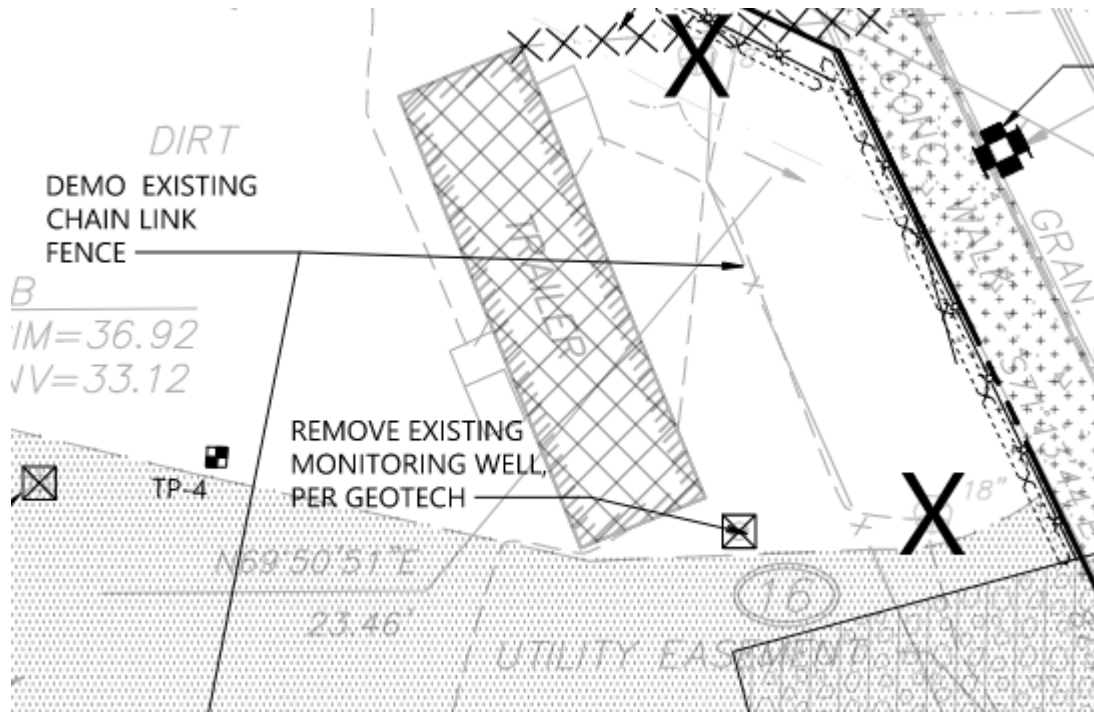
Looking Northerly

The site contains two City of Newton Drain Easements, the first is in a south to north orientation which has a 36" reinforced concrete pipe; and the second has a 36" x 48" box culvert that is in a west-east orientation on #50 Crafts St. The site plans do not indicate the actual location of the respective drain structures/conduits nor the limits of the recorded easements, these should be clearly identified on an existing conditions plan. The actual locations (alignment of both the box culvert & 36" drainpipe) will be required when the plans are updated; it imperative to accurately locate these as we have experienced the fact that sometimes pipes or culverts meander within and outside of the legal easement which may affect and impact the overall proposed design.



City GIS map showing the Drain Easements

Based on a site visit an observation well was discovered during a site visit at the trailer at 34 Crafts Street the demolition plan does show this on sheet C 5.00 and only indicates to be removed. DPW would like to know its status (why it was installed) and has the investigation ended to the DEP's satisfaction.



On Sheet C 6.00 pedestrian curb cuts will be needed on both side of the proposed driveway to the development.

To enhance the aesthetics of the project DPW recommends that the overhead power & telecommunication along the Crafts Street frontage be undergrounded.

Stormwater:

Currently the site has very little stormwater collection system and limited treatment if any. The engineer of record has designed a stormwater collection system in accordance with the City's Stormwater Ordinance that captures and treats the 100-year storm event with deep hooded catch basins, proprietary structural water quality devices and infiltration units. The proposed system will enhance water quality recharge and reduce surface runoff to the City drain system & abutting properties.

The proposed Operations & Maintenance (O&M) plan is acceptable and robust for the design intent; if this permit is approved the O&M plan must be stamped by the engineer of record as a stand-alone document and recorded at the Middlesex Registry of Deed. The O&M will need to add a schematic plan which shows the footprint of the building and exterior amenities and the proposed stormwater system. It is imperative to note that the ownership, operation, and maintenance of the proposed drainage system and all appurtenances including but not limited to the infiltration units, catch basins, trench drains, and pipe(s) are the sole responsibility of the property owner(s).

The existing box culvert & 36" drainpipe is somewhat delineated on this plan; it cannot be assumed that they are centered perfectly within the easements. DPW will require that the applicant perform a Closed Caption Television (CCTV) Inspections with a tracer system capable of locating the culvert on the ground and delineating it on the site plan for both the box culvert and 36" pipe. The CCTV inspection shall be witnessed by a DPW Inspector, 48 hours prior notice shall be given to the DPW.

As the site is over one acre a Stormwater Pollution Prevention (SWPPP) per the NPDES General Permit for stormwater discharges from Construction Activity and Erosion & Sedimentation Control plan will be required.

Sheet C 7.00 Drainage & Grading:

1. The infiltration systems less than 10 feet from the foundation, or property line will require an impervious barrier from the bottom of the system to the top of stone elevation along the side closest to the property line or foundation.
2. The details for the "retain \diamond it" show a couple of inspection ports but due to the length of the system additional ports will be needed. The detail on sheet C-9.00 does not have inspection ports which must be set to finished grade and labeled "Drain".

Sheet C-8.00 Utility Plan:

1. Profiles of the proposed sanitary sewer system is required, the profile shall have the centerline finished grade, the rim & invert elevations of each sewer manhole, slopes of the pipes, pipe material. The profile shall include any other utility (existing or proposed) within a 10-foot radius of the sewer service of the project.
2. The sanitary sewer system for this project shall be considered a “*service connection for the development*” and not a City owned sewer main. Construction and long-term maintenance of the service connection shall be the responsibility of the property owner.
3. Existing water and sewer services to building(s) shall cut and capped at the respective mains and completely removed from the main(s) and its entire length and properly backfilled. The Engineering Division must inspect and approve this work, failure to having this work inspected will result in delay of issuance of the new Utility Connection or issuance of a Certificate of Occupancy.
4. All new sewer service(s) shall be pressure tested in accordance with the City Construction Specifications & Standards and inspected via Closed Circuit Television CCTV inspection after installation is completed. A copy of the video inspection and written report shall be submitted to the City Engineer or his representative. The sewer service will NOT be accepted until the two methods of inspection are completed AND witnessed by a representative of the Engineering Division. A Certificate of Occupancy will not be recommended until these tests are completed to the satisfaction of the City Engineer.
5. All sanitary sewer manhole(s) shall be vacuum tested in accordance to the City’s Construction Standards & Specifications; the sewer service and manhole will NOT be accepted until the manhole(s) pass the testing requirements. All testing MUST be witnessed by a representative of the Engineering Division. A Certificate of Occupancy will not be recommended until this test is completed to the satisfaction of the City Engineer and a written report of the test results is submitted to the City Engineer.
6. With the exception of natural gas service(s), all utility trenches within the City’s right of way shall be backfilled with Control Density Fill (CDF) Excavatable Type I-E up to within 18-inches of the asphalt binder level, after which Dense Grade Gravel compacted to 95 % Proctor Testing shall be placed over the CDF. Details of this requirement is the Engineering Division website “Standard Construction Details”.
7. It is unclear as how the parking garage will have fire suppression system is it a “dry” sprinkler system?

8. The size of the existing City water main on Crafts Street is not identified.
9. Fire flow testing will be required prior to a final water services design. This test must be coordinated with Newton Fire Department [NFD] and the DPW Utilities Division. The locations of the two nearest hydrants shall be selected by the DPW. Hydraulic calculations for the fire suppression system shall be stamped by a registered professional engineer shall be submitted to both the NFD & DPW for review and approval.
10. The engineer of record shall submit hydraulic calculation to determine if a booster pump is needed to provide adequate water pressure for levels above the third floor.
11. The master water meter shall be placed in a heated room and read by the Utilities Division. If the applicant wants to install submeters after the master meter they may do so at their cost, and they will be responsible for individual billings. The City will only provide one meter read.
12. All water services shall be chlorinated, and pressure tested in accordance with the AWWA and the City Construction Standards & Specifications prior to coming online. These tests MUST be witnessed by a representative of the Engineering Division.
13. Approval of the final configurations of the water service(s) shall be determined by the Utilities Division; the engineer of record shall submit a plan to the Director of Utilities for approval.
14. The proposed electrical/ telecommunications connections will require a Grant of Location.

Detail Sheets:

1. The ADA curb cut details show tactile warning plates, for consistency these should specify ADA Solutions "Wet Set" in Federal Yellow or equal, consistent with the City Construction Standards.
2. The base of the curb cuts should have a flush threshold granite curb.
3. Various water & sewer details should conform to the City Construction Standards available online in PDF format.

Construction Management:

1. A construction management plan is needed for this project. At a minimum, it must address the following: staging site for construction materials and equipment, parking for construction workers vehicles, phasing of the project with anticipated completion dates and milestones, safety precautions, emergency contact personnel of the general contractor. It shall also address anticipated dewatering during construction, site safety & stability, siltation & dust control and noise impact to abutters.

The CMP must also address surface runoff during construction so that it does not impact abutters, nor City streets & the stormwater system. Temporary detention basins, check dams or diversion swales should be considered.

2. Catch basins within and downstream of the construction zone will be required to have siltation control installed for the duration of the project and must be identified on the site plan.
3. Preconstruction & Progress meeting(s) shall be required prior to and during construction for the duration with the DPW and other Departments as necessary.

Environmental:

1. Has a 21E Investigation and report been performed on the site, if so, copies of the report should be submitted to the Newton Board of Health and Engineering Division.
2. Are there any existing underground oil or fuel tanks? Have they been removed, if they have been, evidence of the proper removal should be submitted to the Newton Fire Department and the Board of Health.

Infiltration & Inflow:

- Will be address in a separate memo.

General:

1. US Mail delivery & parcel drop offs; will these be in centralized in the building within a mail room"? This needs to be verified with the US Postal Service.

2. All trench excavation shall comply with Massachusetts General Law Chapter 82A, Trench Excavation Safety Requirements, and OSHA Standards to protect the general public from unauthorized access to unattended trenches or excavations. Trench Excavation Permit is required prior to any construction. This applies to all trenches on public and private property. *This note shall be incorporated onto the final plans.*
3. All tree removal shall comply with the City's Tree Ordinance.
4. The contractor of record is responsible for contacting the Engineering Division and scheduling an appointment 48 hours prior to the date when the utilities will be made available for an inspection of water services, sewer services and drainage system installation. The utility in question shall be fully exposed for the Inspector to view; backfilling shall only take place when the City Engineer's Inspector has given their approval. *This note shall be incorporated onto the final plans.*
5. The applicant shall apply for a Building Permit with the Inspectional Services Department prior to ANY construction.
6. Before requesting a Certificate of Occupancy, an As Built plan shall be submitted to the Engineering Division in both digital and paper format. The plan shall show all utilities and final grades, any easements and improvements and limits of restoration. The plan shall include profiles of the various new utilities including but not limited to rim & invert elevations (City of Newton Datum), slopes of pipes, pipe materials, and swing ties from permanent building corners. The as built shall be stamped by both a Massachusetts Registered Professional Engineer and Registered Professional Land Surveyor. Once the As built plan is received the Engineering Division shall perform a final site inspection and then make a determination to issue a Certificate of Occupancy. *This note shall be incorporated onto the final plans.*
7. All site work including trench restoration, sidewalk, curb ,apron and loam border (where applicable) shall be completed before a Certificate of Occupancy is issued. *This note shall be incorporated onto the final plans.*
8. The contractor of record shall contact the Newton Police Department 48-hours in advanced and arrange for Police Detail to help residents and commuters navigate around the construction zone.
9. If any changes from the final approved design plan that are required due to unforeseen site conditions, the contractor of record shall contact the design engineer of record and submit revised design and stamped full scale plans for review and approval prior to continuing with construction.

Note: If the plans are updated it is the responsibility of the applicant to provide all City Departments [ISD, Conservation Commission, Planning and Engineering] involved in the permitting and approval process with complete and consistent plans.

If you have any questions or concerns, please feel free to contact me at 617-796-1023.

City of Newton

Ruthanne Fuller
Mayor

DEPARTMENT OF PUBLIC WORKS
ENGINEERING DIVISION
OFFICE OF THE CITY ENGINEER
1000 Commonwealth Avenue
Newton Centre, MA 02459-1449

DATE: November 13, 2025
TO: Land Use Committee
FROM: Alfredo Vargas, P.E., City Engineer
John Daghljan, Associate City Engineer
RE: **Crafts Street Comprehensive Permit (38 Crafts St)**
Sewer Infiltration/Inflow Mitigation
Ordinance No. B-45

The City Engineer has calculated the sewer infiltration/inflow mitigation fee for this project. See calculations attached. The total mitigation fee, based on the proposed usage of low flow fixtures throughout the project, is \$2,266,576. This calculation includes the reduction of the proposed total flow of the proposed development by the estimated existing flow.

Sewer Ordinance No. B-45 states the following: For projects subject to a special permit, the City Council, for good cause shown, may abate in whole or in part the infiltration/inflow mitigation fee for a particular dwelling, building, or project.

Waiver request:

- a) *The expected impact of the development on sewer infiltration/inflow.* The development will propose to add an average of 23,400 gallons per day to the existing city sewer system. The existing sewer flow from the site is estimated to be 1,300 gallons per day (from previous memo of May 2022). The city's sewer system in this area flows downstream to the interceptor system along the Charles River.
- b) *Whether infiltration/inflow mitigation has previously been conducted in the general area and to what extent.* This project lies in sewer area 5. Sewer area 5 has undergone substantial work related to sewer infiltration/inflow removal, as part of the city's sewer capital improvement program. The estimated cost of design and construction of improvements in sewer area 5 approaches \$8,000,000.
- c) *Whether the abatement will benefit the health and well-being of the public and is reasonably in the best interest of the city.* An abatement of 75% of the infiltration/inflow mitigation fee, \$1,699,932 based on low flow fixtures, is recommended by the City Engineer, in consultation with the Planning Department. This would allow the remaining 25% of the fee, or \$566,644 to be used toward the design and construction of future sewer improvements in areas abutting this development. The developer should consider dedicating the abated amount of the fee towards other mitigation purposes, as recommended by the Planning Department.

Calculation of sewer infiltration/inflow mitigation:

Proposed Sewer Flow:

$$360 \text{ beds} \times 65 \text{ gal/bed} = 23,400 \text{ gpd}$$

Existing Sewer Flow: (from May 2022 memo)

$$36 \text{ Crafts St Office, } 5134 \text{ sf} \times 0.05 \text{ gpd/sf} = 257 \text{ gpd}$$

$$38 \text{ Crafts St Office, } 13,074 \text{ sf} \times 0.05 \text{ gpd/sf} = 654 \text{ gpd}$$

$$19 \text{ Court St Residence, } 4 \text{ bedrooms} \times 65 \text{ gpd/bedroom} = 260 \text{ gpd}$$

$$21 \text{ Court St Residence, } 2 \text{ bedrooms} \times 65 \text{ gpd/bedroom} = 130 \text{ gpd}$$

$$\text{Total existing flow} = 1,300 \text{ gpd}$$

$$\text{Net flow} = 22,100 \text{ gal/day} \times 4 \times \$25.64 \text{ (updated 1/1/2025)} = \$2,266,576$$

$$75\%: \$1,699,932$$

$$25\%: \$566,644$$



January 15, 2026

Cat Kemmett
Deputy Chief Planner
Planning & Development Department
City of Newton
1000 Commonwealth Avenue
Newton, MA 02459-1449

Re: Initial Stormwater Peer Review
Comprehensive Permit Application #CP-25-1
38 Crafts Street, Newton, Massachusetts

Dear Ms. Kemmett:

The Horsley Witten Group, Inc. (HW) is pleased to submit this peer review to the Zoning Board of Appeals (ZBA) regarding stormwater management, wastewater flows, phosphorus removal, utilities and grading, lighting and photometrics, connections to open space resources, and the sustainability report submitted to the City of Newton in October and November 2025 for the Comprehensive Permit application submitted for the 38 Crafts Street development.

The Applicant has proposed to develop a site that is currently comprised of seven parcels. The existing site supports various uses including two residential dwellings, two commercial buildings and associated parking, and a gravel parking lot used for fleet storage of school buses. The site has frontage on both Crafts Street and Court Street. The Applicant proposes to demolish the four existing buildings at the site and construct one 6-story residential building with an interior parking garage. Stormwater generated from the site is proposed to be managed through a combination of water quality units and subsurface infiltration systems (SIS), which will connect to the City's municipal drainage system for rainfall events that exceed the capacity of the onsite drainage system.

HW participated in a site walk on January 8, 2026 and has reviewed the following documents and plans:

- Site Plans, 38 Crafts Street, Crafts Street & Court Street, Newton, Massachusetts, prepared by VHB, issued October 16, 2025 (13 sheets);
- Existing Conditions Plan, 34, 36, 38, 48, and 50 Crafts Street, 19 and 21 Court Street, Newton, MA, prepared by Allen and Major Associates, Inc., issued October 16, 2025 and revised October 23, 2025 (1 sheet);
- Photometric Plan, 38 Crafts Street, Newton, MA, prepared by DB Lighting Consultation, issued October 8, 2025 (1 sheet);

- Site Landscape Plans, Crafts Street, 38 Crafts Street, Newton, MA, prepared by Hawk Design, Inc., issued October 16, 2025 (4 sheets);
- Architectural Plans, Crafts Street, 38 Crafts Street, Newton, MA, prepared by PCA, Inc., dated October 16, 2025 (18 sheets);
- Stormwater Management Report, 38 Crafts Street, Crafts Street & Court Street, Newton, MA, prepared by VHB, dated October 16, 2025 (291 pages);
- Stormwater Management Systems Operations and Maintenance Manual, 38 Crafts Street, Crafts Street and Court Street, Newton, MA, dated October 16, 2025 (75 pages);
- Design Narrative, 38 Crafts Street, Newton, MA, prepared by PCA, Inc., undated (3 pages);
- Sustainability Narrative, Alta Newton, 38 Crafts Street, Newton, MA, prepared by Sustainable Comfort, dated October 17, 2025 (14 pages);
- Transportation Impact and Access Study, 38 Crafts Street, Crafts Street and Court Street, Newton, MA, prepared by VHB, dated November 2025 (676 pages); and
- Unit Mix Template for Inclusionary Housing Projects, Alta Newton, prepared by WP East Acquisitions, LLC, dated October 21, 2025 (spreadsheet).

HW is aware of several other review documents prepared by City of Newton staff. To the extent possible, we have avoided duplicating previous comments except for those that impact the site and stormwater design. The following review documents were provided to HW for reference:

- Public Hearing Memorandum, Application #CP-25-1, 38 Crafts Street, prepared by the City of Newton Department of Planning and Development, dated November 12, 2025 (35 pages), which includes:
 - Summary of Relief and Waivers Requested (4 pages)
 - Zoning Review Memorandum, ZR-25-68, prepared by the City of Newton Chief Zoning Code Official and the Chief Planner for Current Planning, dated October 23, 2025 (10 pages)
 - Project Eligibility/Site Approval, Alta Newton, MassHousing ID No. 1284, prepared by MassHousing, dated October 15, 2025 (9 pages)
- Memorandum regarding Crafts Street Comprehensive Permit (38 Crafts Street) Sewer Infiltration/Inflow Mitigation, Ordinance No. B-45, prepared by the City of Newton Department of Public Works Engineering Division, dated November 13, 2025 (2 pages); and
- Memorandum regarding Comprehensive Permit – 25-1 ~38 Crafts Street, prepared by the City of Newton Associate City Engineer, dated November 14, 2025 (11 pages).

Stormwater Management Review

This review of the submitted materials is based on the Massachusetts Stormwater Management Standards (MASWMS), and the City of Newton Stormwater Management and Erosion Control Rules & Regulations (Stormwater Regulations), dated April 15, 2022, as well as standard engineering practices.

In accordance with § 5.C.2 of the Stormwater Regulations, this project is required to comply at a minimum with the performance standards described in the Massachusetts Stormwater Handbook (MSH). Therefore, we have used the MSH as the basis for organizing our comments as they pertain to stormwater. However, in instances where the additional criteria established in the City of Newton Stormwater Regulations require further recommendations, we have referenced these as well.

HW offers the following comments:

1. *Standard 1: No new stormwater conveyances (e.g., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.*
 - a. The Applicant has evaluated two design points (DP) under existing and proposed conditions. Both design points ultimately discharge to the Charles River via the City's municipal drainage system.
 - DP-1 is the municipal drainage system within Court Street on the southern side of the Project Site.
 - DP-2 is the municipal drainage system within Crafts Street. On the northern side of the Project Site.
 - b. The Applicant has proposed a stormwater management system that will reduce the peak flow and volume to both design points, and ultimately to the Charles River. The proposed design does not include a new direct discharge point and will not cause erosion at the design points. Pending any design changes based on the comments included below, the Applicant complies with Standard 1.
2. *Standard 2: Stormwater management systems shall be designed so that post-development peak discharge rates do not exceed pre-development peak discharge rates.*

The Applicant proposes to replace the mostly gravel cover of the project area with a building area and additional pervious spaces. The design as proposed appears to reduce peak flows and peak volumes offsite. HW offers the following comments associated with the HydroCAD model and the Site Plans.

- a. The following comments pertain to the Applicant's drainage area delineation of the site:
 - i. Limited topography is shown on the west side of the site. HW recommends that the Applicant verify whether stormwater from any off-site areas runs-on to the project site.
 - ii. Topography on the northwest side of the site shows some higher elevations than on the site, indicating run-on may be present from the 64 Crafts Street Parcel. HW recommends that the Applicant verify whether any stormwater run-on enters the site from this area.

- iii. The northern edge of proposed DA 20 (i.e., the Crafts Street side) extends onto the driveway apron. Based on the proposed Grading and Drainage Plan (Sheet C 7.00), a high point along the driveway appears to split the drainage area so that runoff on the apron would drain down to Crafts Street (DA 22) instead of flowing toward the catch basins of DA 20.
 - iv. The stormwater runoff from the landscaped areas along the western edge of DA 11 and DA 21 seems likely to drain offsite rather than draining to the proposed area drains. HW recommends that the Applicant indicate spot grades or a small berm west of AD 214 and a swale south of SIS 1 to ensure that runoff does not exit the site and flow towards abutting parcels.
- b. A portion of existing drainage area (DA) 2 is classified as mixed lots. An adjacent section of DA1 appears to have the same land use (small residential lots) but is classified into impervious and grass areas. HW recommends that the Applicant reclassify this section of DA1 for consistency or clarify the different land classifications.
 - c. Existing DA2 is depicted with an area of impervious cover on the west side of the gravel lot, which includes a thin line of gravel cover inside of it. HW recommends that the Applicant clarify why this impervious area is not modeled as gravel, and whether the thin strip of gravel in the middle is representative of actual conditions.
 - d. In the proposed drainage conditions figure, roof overhangs are represented as pervious cover. HW recommends that the Applicant model these areas as rooftop or justify this classification.
 - e. Based on the existing conditions plan, there is an existing catch basin next to six manhole covers in the parking area of the 38 Crafts Street parcel. The configuration of the manhole suggests that an existing subsurface stormwater practice might be present. HW recommends that the Applicant confirm the presence or absence of an existing stormwater control measure at this location.
 - f. The following comments pertaining to the HydroCAD model:
 - i. The Applicant has run the model using different time increments between existing (0.05 hours) and proposed (0.01 hours) conditions, which may produce inconsistent results between the two. HW recommends that the Applicant use the same time increment for both.
 - ii. The total area of the proposed model is less than the total area of the existing model. HW recommends that the Applicant revise the areas to be equal or justify the inconsistency.

- iii. The Applicant has modeled pervious landcover as grass in “fair” condition. As a conservative design measure and consistent with Stormwater Regulations §5.B.6, HW recommends that the Applicant represent pervious landcover using the “good” condition in both existing and proposed models.
 - iv. The slope of the outlet pipes modeled for SIS-1 (P-1) and SIS-3 (P-3) are inconsistent with the slopes of the corresponding pipes shown on the plans (outlets from OCS 219 and OCS 202). HW recommends that the Applicant adjust the plans or the model for consistency.
 - v. The storage volume about SIS-2 is modeled as spanning an area of 1,000 square feet (sf) across the 38 foot contour, which does not seem consistent with the grading shown on Sheet C 7.00. HW recommends that the Applicant justify this modeling decision.
 - g. Overall, the Applicant has proposed a stormwater management system that is designed to capture not only runoff from the 2-inch storm, but also runoff from up to a 25-year storm event. Post-development peak rates and volumes are modeled to be lower than pre-development values. Pending any changes to the design, the Applicant complies with Standard 2.
3. *Standard 3: The annual recharge from post-development shall approximate annual recharge from pre-development conditions.*

The Applicant proposes to recharge a volume of runoff from the Site greater than the required recharge volume based on the total post-development impervious area. HW offers the following comments related to the recharge calculations:

- a. Based on the seven test pits conducted by Sanborn Head in August 2025, redoximorphic concentrates were identified in five test pits between elevations between 32.0 and 33.0. These test pits covered much of the site, including one location (TP-2) directly underneath a proposed infiltration practice (SIS-1). Based on the consistent elevation of the redoximorphic features across the site, it seems likely that the estimated seasonal high groundwater (ESHGW) elevation across the site varies between 32.0 to 33.0 feet, which is higher than the bottom of the proposed SIS's. HW recommends that the Applicant provide justification for the design ESHGW elevation of 28.0 or redesign the stormwater system to provide the required separation.
- b. As designed, the proposed SIS's have 2 feet of separation from the ESHGW used by the Applicant. Per MASWMS Volume 3, Chapter 1, HW recommends that any stormwater design in which the separation between the bottom of an infiltration practice and the ESHGW is less than 4 feet should have a mounding analysis conducted to ensure that the stormwater design will be able to sufficiently drain without interference from an elevated water table.

- c. As noted above, only one soil test pit (TP-2) is within the footprint of a proposed infiltration practice (SIS-1). Consistent with Stormwater Regulations §5.B.5, HW recommends that the Applicant conduct soil test pits within 25 feet of SIS-2 and SIS-3.
 - d. The Applicant has designed the stormwater system based on an infiltration rate of 8.27 inches per hour (iph), which corresponds to sandy material. This is reasonable based on the results of the test pits conducted to date. As discussed under Standard 4 below, this rapid rate of infiltration will require a higher level of pretreatment prior to discharging to an infiltration practice. Given the locations of the test pits conducted to date, HW recommends that the Applicant confirm that the material of any future test pits conducted under the proposed practices have a comparable exfiltration rate.
 - e. The Applicant has calculated the required volume of recharge for the site based on the total post-development impervious area and has provided recharge volume calculations, as noted above. These initial calculations indicate that the total recharge volume provided exceeds the required volume, and that all infiltration practices can drain within 72 hours. HW could not confirm the recharge volume with the information provided. HW recommends that the Applicant provide the stage-storage tables from the HydroCAD model to verify the calculated recharge volumes.
4. *Standard 4: The stormwater system shall be designed to remove 90% Total Suspended Solids (TSS), to remove 60% of Total Phosphorus (TP), and to treat 2.0-inch of volume from the impervious area for water quality.*

The Applicant proposes to capture and treat runoff from the equivalent of 2 inches times the post-development impervious area of the site. The proposed design includes pretreatment practices designed to provide 44% TSS removal prior to discharging to the SIS practices. HW offers the following comments related to the treatment calculations:

- a. The Applicant has provided calculations of the treatment volume provided by each practice. As noted under the Standard 3 review comments, HW recommends that the Applicant provide stage-storage tables to verify the volumes used in these calculations.
- b. The Applicant has provided treatment trains to demonstrate that runoff from impervious surfaces will attain over 90% TSS removal and will receive pretreatment of more than 44% prior to being discharged to any infiltration practices (meeting the requirements of an area with rapid recharge noted above in Standard 3). Pending any changes to the drainage design, the Applicant appears to comply with Standard 4.
- c. The Applicant has provided proposed Phosphorus Removal calculations, which are discussed below in the Phosphorus Removal section of this memorandum.

5. *Standard 5 is related to projects with a Land Use of Higher Potential Pollutant Loads (LUHPPL).*
 - a. The project site does not meet the criteria of a LUHPPL. No further action is requested.
6. *Standard 6 is related to projects with stormwater discharging into a critical area, a Zone II or an Interim Wellhead Protection Area of a public water supply.*
 - a. The Project Site does not discharge into a critical area. No further action is requested.
7. *Standard 7 is related to projects considered Redevelopment. A redevelopment project is required to meet the following Stormwater Management Standards only to the maximum extent practicable: Standard 2, Standard 3, and the pretreatment and structural best management practice requirements of Standards 4, 5, and 6. Existing stormwater discharges shall comply with Standard 1 only to the maximum extent practicable. A redevelopment project shall also comply with all other requirements of the Stormwater Management Standards and improve existing conditions.*
 - a. The Applicant has described the project as a redevelopment but has designed it to meet the full requirements of the MASWMS. No further action is requested.
 - b. HW notes that the Applicant's categorization of the project as a redevelopment is based on characterizing the existing gravel lot as impervious cover. Although the gravel lot appears very compacted, HW recommends that it be considered as pervious cover for the sake of calculating the total existing impervious area. By this standard, the project would be considered a new development, with an increase in impervious cover of approximately 0.320 acres.
 - c. Consistent with Stormwater Regulations §6.C.2.c.3, HW recommends that the Applicant note the existing and proposed impervious area totals on the site plans.
8. *Standard 8 requires a plan to control construction related impacts including erosion, sedimentation, or other pollutant sources.*
 - a. The proposed development will disturb greater than 1 acre of land therefore will require a Construction General Permit through the US Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) program. The Applicant has noted that a Stormwater Pollution Prevention Plan (SWPPP) will be prepared. The ZBA may choose to include a condition of approval requiring receipt of the SWPPP for review by the City of Newton 30 days prior to land disturbance.
 - b. Consistent with Stormwater Regulations §6.C.2.c.5, HW recommends that the Applicant clearly show the limit of work on all sheets of the site plans depicting proposed work.

- c. Based on the Existing Conditions Plan and the Site Preparation and Erosion Control Plan (Sheet C 5.00), two catch basins are located across from 25 Court Street that are downgradient of site activities but are not proposed to receive catch basin inserts. HW recommends that the Applicant revise Sheet C 5.00 to indicate catch basin inserts at these locations.
 - d. Consistent with Stormwater Regulations §6.C.2.c.7 and 6.C.4.f, HW recommends that the Applicant indicate the intended material storage and soil stockpile locations on Sheet C 5.00.
 - e. In the Memorandum prepared by the Associate City Engineer, a request was made stating that any existing onsite utilities that will not be used under proposed conditions should be fully cut and capped at the main and fully removed and disposed of from the site. HW recommends that the Applicant confirm whether all on-site utilities proposed for removal are indicated as such on Sheet C 5.00, and revise the plans as needed to capture all utility removal activities.
 - f. Consistent with Stormwater Regulations §6.C.4.a, HW recommends that the Applicant state the area of disturbance on Sheet C 5.00.
 - g. Consistent with Stormwater Regulations §6.C.2.c.13, HW recommends that the Applicant add a note to the site plans to “notify the Engineering Division Inspector 48 hours prior to any site work in accordance with project permits.”
9. *Standard 9 requires a Long-Term Operation and Maintenance (O & M) Plan to be provided.*
- a. The Applicant has provided a stand-alone O&M Plan as required. The Applicant has included a checklist and a figure illustrating where the various stormwater practices will be located. HW recommends that the final O&M Plan be signed by the property owner, include contact information for the on-site point of contact and facility manager, and include an estimated budget for long-term maintenance.
 - b. In the O&M Plan, the Applicant indicates that catch basins should be cleaned once annually. Per MSH Volume 2, Chapter 2, HW recommends that the Applicant revise this cleaning rate to four times annually and revise any O&M schedules for consistency as required. The Applicant may also consider increasing the maintenance frequency of proprietary water quality units to four times annually too, since the maintenance activities may be the same in these structures.
 - c. HW recommends that the Applicant revise the Device Location Map or the O&M Checklist so the two documents have the same numbering and symbol names.

- d. The O&M Plan includes Snow Management and a map with snow storage locations. It appears many of the areas designated for snow storage include proposed trees, and it is not clear what is proposed if a severe snowstorm occurs and there are no snow storage locations available on site. HW recommends that the Applicant clarify if off-site snow disposal will be required at the site and revise the Snow Management section of the O&M Plan as needed.

10. *Standard 10 requires an Illicit Discharge Compliance Statement be provided.*

- a. The Applicant has provided a statement regarding Prohibition of Illicit Discharges in the Stormwater Report, which has been signed by the property owner. No further action is requested.

11. *Additional General Stormwater Comments.*

- a. HW recommends that the Applicant note the inlet inverts into SIS 3 from CB 223, BD 213, and CO 210 on Sheet C 7.00.
- b. The outlet invert from CO 210 is higher than the inlet invert. HW recommends that the Applicant confirm this is the design intent, as it appears that this will cause standing water in the drainage network.
- c. HW recommends that the Applicant verify that the proposed drainpipe from DMH 224 to DMH 230 will not conflict with the existing DMH on Court Street.
- d. The pipe sizing calculations provided by the Applicant do not include the pipe runs from AD 214 to SIS 2, any pipes from the building to the SIS's, or from DMH 228 to DMH 218 to the existing DMH north of the site. HW recommends that the Applicant revise the calculations to include these pipes.
- e. The "fall" between pipe inverts shown for the AD 216, 217, and 222 runs on the pipe sizing calculations are inconsistent with the inverts listed in the table (and with the plans). HW recommends that the Applicant revise these values and adjust the design as needed.
- f. The outlet invert for OCS 219 that is listed in the Outlet Control Structure with Weir Detail (elevation 35.5, Sheet C-9.02) is inconsistent with the invert shown on Sheet C-7.00 (elevation 33.5). Additionally, the detail shows two orifices in the OCS weir that do not appear to be proposed for either of the OCS structures. HW recommends that the Applicant revise this detail to be consistent with the proposed drainage design.

Wastewater

12. The City Engineer issued a memorandum dated November 13, 2025, regarding the Crafts Street Comprehensive Permit, *Sewer Infiltration/Inflow Mitigation, Ordinance No. B-45*. The memorandum listed the expected design flow rates utilized in the Wastewater Generation calculation and detailed the sewer infiltration/inflow (I/I) mitigation fee based on the proposed usage of low flow fixtures throughout the project. The estimated wastewater flow determined for the proposed development is 23,400 gallons per day (gpd). HW recommends that the Applicant coordinate with the City Engineer to confirm acceptance of the proposed I/I mitigation fee.
13. The Associate City Engineer issued a memorandum dated November 14, 2025, regarding the Comprehensive Permit at 38 Crafts Street. Several comments in the review relate to the wastewater installation and testing. HW recommends that the Applicant review and fully comply with the Associate Engineer's comments.

Phosphorus Removal

The Applicant has provided TP and TSS removal calculations in the Stormwater Report. Per Stormwater Regulations §5.C.3, the City of Newton requires typical Major New Development projects to reduce 60% of the TP load and 90% of the TSS load from pre- to post-development conditions. HW offers the following comments:

14. The TP removal calculations indicate that the proposed stormwater management system is designed to provide a TP removal rate of 93%. HW notes that this removal rate is for the proposed conditions of the site only and does not quantify the *difference* between the existing TP loading and the proposed TP loading. HW recommends that the Applicant calculate the existing TP load at the site and evaluate the percent reduction based on this value.
15. In addition to the standard TSS removal calculations that are based on the MSH, the Applicant has provided TSS removal calculations that estimate the TSS load from the site (in pounds per year) and use TSS removal rates that differ from those listed in the MSH. Based on these secondary calculations:
 - a. HW recommends that the Applicant clarify the source of the TSS loading rate and removal credit used.
 - b. HW notes that in the Site Summary table (page 272 of the Stormwater Report), the annual rate of TSS removal from impervious areas is higher than the TSS load, which implies that more TSS is removed from the site than is generated. HW recommends that the Applicant clarify this calculation.

Utility and Grading Plans

16. The Associate City Engineer issued a memorandum dated November 14, 2025, regarding the Comprehensive Permit at 38 Crafts Street. Many of the comments in the review relate to onsite utilities and grading. HW recommends that the Applicant review and fully address the Associate Engineer's comments.
17. The rim elevation of OGS 229 (37.30) shown on Sheet C 7.00 appears to be lower than the proposed grade in that location (approximately 38.20). HW recommends that the Applicant confirm if this is the design intent or revise the plans.
18. The rim elevation of AD 217 (37.20) shown on Sheet C 7.00 is less than 2 feet from the proposed 38-foot contour, indicating a slope greater than 3:1. HW recommends that the Applicant indicate that an erosion control blanket be installed along this steep slope, or revise the design to make the slope more gradual.
19. The slope of the dog run shown appears to be greater than 5% based on Sheet C 7.00. This slope would not be considered ADA-accessible, which may not be required given that it is not a primary path of travel, but could be a more inclusive design. HW recommends that the Applicant consider revising the grading in this area to maintain a slope at 5% or less.
20. Based on the spot grades, the proposed grading on Sheet C 7.00 appears to be missing a 38-foot contour east of AD 205. HW recommends that the Applicant revisit the grading in this location.
21. Sheet C 8.00 illustrates the proposed utilities. The stormwater is located on the south and west sides of the site. Electric, telephone, and water connections are located at the north corner of the building; an additional water pipe connects to a proposed hydrant at the south corner. The proposed sewer runs from the south and east sides of the building to two connection points along Crafts Street. There does not appear to be any gas service offered. HW finds the proposed utility locations reasonable at this stage of the design.

Lighting and Photometrics

22. The Applicant has provided a Site Lighting plan prepared by DB Lighting Consultation. The lighting design includes light posts along Crafts Street and the proposed driveway, and bollards with lights at the site entrance on Crafts Street and along the pedestrian pathway on the north side of the site.
23. HW reviewed the proposed lighting design per the regulations of the City's Revised Ordinances Chapter 20, Article III, Light Trespass. HW recommends that the Applicant verify that the proposed design will not exceed 0.35 footcandles on abutting properties at a distance of more than 5 feet from the property line, per Light Trespass §20-25.a. The plan as provided does not extend beyond the property line itself.

24. HW recommends that the Applicant update the Site Lighting plan so that the light source symbols are in consistent locations with the light posts and bollards shown on the plan. The footcandle calculations should be based on the most up to date lighting layout.

Sustainability

25. The Applicant has provided a Sustainability Narrative prepared by Sustainable Comfort. The narrative describes the sustainability metrics of the project using the Passive House Institute US (Phius) criteria, which uses energy modeling to reduce overall energy usage from heating and cooling.
26. The Sustainability Narrative includes a recommendation for the Applicant to explore photovoltaics (PV) in order to meet Phius criteria. HW supports this recommendation, which would provide a renewable source of energy for the building and reduce the project's energy demand from the power grid.
27. The Applicant indicates in the Design Narrative that 290 parking spaces will be provided to residents of the building. HW recommends that the Applicant indicate whether any electric vehicle (EV) spaces will be provided. The Sustainability Narrative provides guidance on the minimum number of EV spaces required under both the Massachusetts Energy Code and the Phius framework.

Conclusions

HW recommends that the Zoning Board of Appeals requires the Applicant to provide a written response to address these comments as part of the permitting review process. The Applicant is advised that provision of these comments does not relieve them of the responsibility to comply with all City of Newton Ordinances, Commonwealth of Massachusetts laws, and federal regulations as application to this project. Please contact Janet Bernardo at 857-263-8193 or at jbernardo@horsleywitten.com if you have any questions regarding these comments.

Sincerely,

HORSLEY WITTEN GROUP, INC.



Janet Carter Bernardo, PE
Principal



Jonas Procton, PE
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