

## MEMORANDUM

**Date** June 26, 2020

**To** Alison C. Steinfeld, Planning Director  
Department of Planning and Community Development  
333 Washington Street  
Brookline, MA 02445

**From** James D. Fitzgerald, P.E., LEED AP

**Subject** 500 Harvard Street Traffic Peer Review

Environmental Partners (EP) has reviewed the Traffic Assessment Memorandum (“the Memo”) prepared by Vanasse & Associates, Inc. (VAI) for the proposed mixed-use development located at 500 Harvard Street in the Town of Brookline, dated March 13, 2020 and updated May 8, 2020. EP also reviewed a supplemental memo prepared by VAI providing crash data, dated May 28, 2020, and a Transportation Demand Management Plan updated May 2020.

In general, VAI has prepared this assessment in a professional manner, consistent with standard engineering practices. The following is a summary of EP’s traffic review. Walker Parking Consultants will provide a separate peer review of the proposed parking.

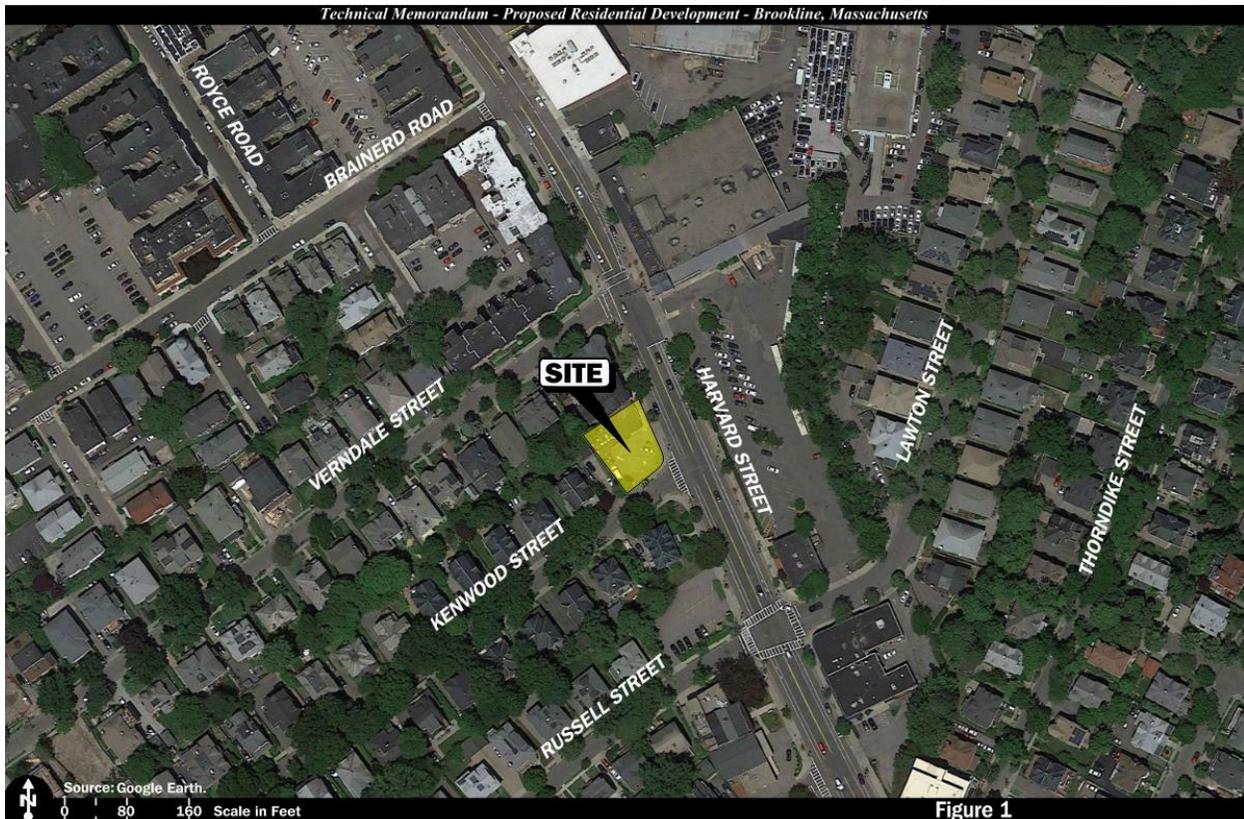
### Project Description

The Memo outlines the following project description:

“Currently, 500 Harvard Street is occupied by the Shan-A-Punjab restaurant serving modern Indian cuisine. The site is situated on the northwest corner of the intersection of Harvard Street and Kenwood Street. The Project involves redeveloping the site into a residential development providing 30 apartment units and 1,740 sf of ground floor retail. A total of 6 parking spaces will be provided on-site (3 stacker spaces that accommodate 5 vehicles and 1 handicap space). Access to the site will be provided by way of the existing curb cut onto Kenwood Street. The existing curb cut onto Harvard Street will be closed”.

### Existing Conditions

The Memo included a description of the study area geometry, which consists of one roadway, Harvard Street, and the intersection of Harvard Street at Kenwood Street, as well as the intersections of the two existing site driveways onto Harvard Street and Kenwood Street. Figure 1 shows the Site Location Map provided by VAI.



**Figure 1 – Site Location Map (Source: VAI Memo)**

Kenwood Street is a residential, local one-way roadway that runs in a general westbound direction. Coolidge Park is located on the southern side of the roadway and contains tennis and basketball courts, a playground, walkways, and greenspace. The roadway contains a speed hump and a posted 15 mile per hour (mph) speed limit. Through discussions with the Town of Brookline, the Town Transportation Administrator indicated that the speed hump was installed due to the proximity to Coolidge Park. At that time, the speed limit on Kenwood Street was 30 mph and speeding was not cited as a reason for installing the speed hump.

Kenwood Street intersects Columbia Street on its east side. Columbia Street is also a residential, local roadway and contains bi-directional travel in a general northbound-southbound direction. In the northbound direction, the roadway has been cut-off between Verndale Street and Brainerd Road due to an issue with cut-through traffic in the past. In the southbound direction, the roadway curves and intersects Harvard Street on its west side, approximately 400 feet south of the Kenwood Street intersection. As such, there is no direct outlet from Columbia Street to points north or south of the project.

The proposed project is located on the northwest corner of the intersection of Harvard Street and Kenwood Street. As the existing curb cut on Harvard Street is proposed to be closed, all vehicles exiting the site will have to travel westbound along Kenwood Street away from Harvard Street, along Columbia Street, and then along one of the other residential roadways to circulate back to Harvard Street to access points to the north and south of the project area. (The trip distribution for the proposed development described in the Trip Distribution and Assignment section indicates 50% in

each direction.) Despite being located on the corner of Harvard Street, residents will have to travel an inconvenient route through a residential neighborhood with slow speeds for as long as 2,600 feet to access Harvard Street.

VAI did not study the roadways in the surrounding neighborhood despite the proposed driveway location requiring vehicles to exit onto a one-way road through the neighborhood. EP recommends considerations be made for site traffic impacts to safety for the cut-through route of exiting site traffic, as discussed in detail in the “Recommendations and Conclusions” section at the end of this memo.

## Existing Traffic Data

VAI collected Turning Movement Count (TMC) data at the study area intersections. The traffic data was then seasonally adjusted as described below.

### Seasonal Adjustment

VAI reviewed traffic volume data from a permanent count station located on the Massachusetts Turnpike (Interstate 90), west of Commonwealth Avenue, which indicated that traffic volumes for the month of February are approximately 4% lower than the average month. As such, they increased the collected traffic data by 4% to represent average-month conditions.

EP notes that due to the difference in use for different types of roadways, the seasonal fluctuations may vary between that of an interstate and that of an urban principal arterial, such as Harvard Street. We would typically recommend referencing the MassDOT 2019 Weekday Seasonal Factors Report as a secondary source; however, as the MassDOT report indicates traffic volumes for these types of roadways are approximately 3% lower than the average month, the 4% increase VAI used presents a more conservative approach.

### Turning Movement Count (TMC) Data

VAI collected TMC data in February 2020 to capture the weekday morning peak period (7:00 AM – 9:00 AM) and the weekday evening peak period (4:00 PM – 6:00 PM) at the study intersections. EP requests the date the traffic counts were performed.

Figure 3 graphically depicts the seasonally adjusted peak hour volumes and the total peak hour volumes are presented in Table 1. Figure 3A graphically depicts the weekday morning and evening peak hour pedestrian and bicycle volumes. The figures and table all appear to be accurate based on the traffic volume data provided in the appendix.

EP notes that one (1) vehicle out of 11 exiting vehicles during the weekday evening peak hour took an illegal left-turn from the driveway on Kenwood Street to access Harvard Street traveling in the opposite direction of the one-way roadway. Due to the configuration of the neighborhood roadways as described in the previous section, one could speculate that some residents of the proposed project may also take an illegal left-turn out of the proposed Kenwood Street driveway to avoid traveling the inconvenient and long travel route through the Kenwood Street, Columbia Street and Verndale Street neighborhoods to access Harvard Street.

### Automatic Traffic Recorder (ATR) Data

VAI did not collect Automatic Traffic Recorder (ATR) data as part of this project. EP recommends including ATR counts, which would provide documentation of the vehicle speeds in the study area necessary to determine sight distance discussed below.

## Crash History

The Memo indicates that according to the crash data provided by MassDOT, no crashes occurred at the intersection of Harvard Street at Kenwood Street or at the site driveways between 2013 and 2017, which represents the most recent five-year period of available data.

In the supplemental memo, VAI indicated they had received crash data from Brookline Police Department, which only included one crash report for a crash that took place slightly north of the study area at 525 Harvard Street.

As there were no crashes at the intersection of Harvard Street at Kenwood Street or the site driveways, VAI did not prepare crash rate worksheets, and EP has no comments.

## Sight Distance

VAI used the American Association of State Highway and Transportation Officials (AASHTO) guidelines to determine if the sight distance at the proposed location of the driveway along Kenwood Street meets requirements. The AASHTO guidelines provide two criteria for determining adequate sight distance at an intersection:

Stopping Sight Distance (SSD) – the distance required by a vehicle traveling at the design speed of a roadway, on wet pavement, to stop prior to striking an object in its travel path

Intersection Sight Distance (ISD) – the sight distance required by a driver entering or crossing an intersecting roadway to perceive an oncoming vehicle and safely execute a turning or crossing maneuver

The AASHTO guidelines indicate that if the sight distance at an intersection is at a minimum equal to the SSD, drivers have sufficient distance to avoid a collision in most cases; however, it is desirable to exceed this distance where possible, and therefore ISD is preferred.

VAI assumed that due to the proximity of the proposed driveway to the Harvard Street intersection, vehicle speeds along Kenwood Street would be low, ranging from 5 to 15 mph, and as such, they calculated the sight distance using a speed of 10 miles per hour (mph). While EP agrees that speeds will likely not be excessive due to the turning maneuver from Harvard Street, no ATR counts were taken to document speeds, and therefore the assumed 10 mph is unfounded. Furthermore, in recent traffic studies for other developments along Harvard Street intersection corners, VAI used both documented and assumed higher travel speeds of 15 to 20 mph along the side streets immediately adjacent to Harvard Street.

According to AASHTO guidelines, a 10 mph speed requires a minimum SSD of 46 feet and a 15 mph speed requires a minimum SSD of 80 feet. VAI reports the available (measured) sight distance to the

intersection of Harvard Street at Kenwood Street is 69 feet, less than that required for a speed of 15 mph (should a 15 mph speed be deemed appropriate). As such, the minimum sight distance requirements may or may not be met depending on the vehicle speeds at this location. EP recommends providing documentation of travel speeds in order to properly determine whether or not there is adequate sight distance. EP also requests that a sight distance triangle be shown on plan to illustrate the intended sight lines for review as VAI has provided for other sites.

During our site visit, EP observed a clear line of sight to Harvard Street assuming no vehicles would be parked along Kenwood Street between Harvard Street and the site driveway. Regardless of vehicle speeds, EP recommends prohibiting parking along Kenwood Street between Harvard Street and the site driveway to allow for optimal sight lines, which is also discussed in detail in the "Recommendations and Conclusions" section at the end of this memo.

VAI also measured the sight distance from the driveway to a potential pedestrian as per Town of Brookline Zoning By-law requirements (Section 6.04.4.f.1) and EP agrees these requirements appear to be met.

## Alternative Transportation

VAI described the various alternative transportation options near the project site, which include:

- Massachusetts Bay Transit Authority (MBTA) bus routes
- MBTA Green Line stations
- Ridesharing services
- Zipcar locations
- BLUEBike stations

VAI indicated that the proposed project is expected to take advantage of the multitude of alternative transportation options. The information provided by VAI appears to be accurate. An extensive Transportation Demand Management Plan has been prepared separately from this assessment, which EP has reviewed at the end of this document.

## Future Traffic Growth

VAI projected the 2020 existing traffic volumes seven years to 2027 future traffic conditions. They used a 1 % background growth rate per year over the seven-year period and identified other planned developments and/or roadway improvement projects in the area that may add vehicle trips or impact traffic volumes through the study area. Figure 5 graphically depicts the 2027 No-Build weekday morning and evening peak hour volumes. EP requests the backups for the traffic volumes generated from the other developments in order to verify the calculations. In general, however, we agree with this methodology and the selected growth rate.

## Project-Generated Traffic

### Trip Generation

VAI applied the latest edition (Tenth Edition) of the Institute of Transportation Engineers (ITE) Trip Generation Manual to estimate the proposed project-generated vehicle trips using Land Use Code (LUC) 221 – “Multifamily Housing (Mid-Rise)” (30 residential units) and LUC 820 – “Shopping Center” (1740 square feet (sf) of retail space).

LUC 221 describes “Multifamily Housing (Mid-Rise)” as “apartments, townhouses, and condominiums located within the same building with at least three other dwelling units and that have between three and 10 levels (floors).” VAI used the average rate method, which results in approximately the same number of generated trips as the fitted rate method for this land use code. EP agrees with the use of this land use code and the methodology.

Due to the proximity to public transportation and an expectation that a portion of the residents will use these services, walk, or bicycle, VAI reduced the number of proposed vehicle trips generated by the project. Based on the 2014-2018 American Community Survey (ACS), VAI used a vehicle occupancy rate of 1.09 and a 62% reduction for transit, walking, and bicycling. The assumptions and calculations appear to be accurate based on the survey data provided in the appendix.

LUC 820 describes “Shopping Center” as “an integrated group of commercial establishments that is planned, developed, owned, and managed as a unit. A shopping center’s composition is related to its market area in terms of size, location, and type of store. A shopping center also provides on-site parking facilities sufficient to serve its own parking demands.” EP agrees with the use of this Land Use Code; however, due to the relatively small size of this retail space, the development falls outside of the available data set (the smallest data point at 9,000 sf), which may skew the results of the trip generation from standard ITE methodology. As in previous peer reviews, VAI used the data points for the smallest developments available to calculate an average rate, which is more likely to accurately predict the trips generated from a retail development of this size. EP agrees with this methodology and the calculations appear to be accurate.

VAI did not account for pass-by trips as part of the trip generation. Traffic studies<sup>1</sup> show that for LUC 820 (for the retail use), on average 34% of vehicle trips were pass-by trips during the PM peak period; no data is available for the AM peak period. A reduction for some pass-by trips may be appropriate to more accurately predict the trip generation of the retail component of the proposed development; however, the results presented in the Memo reflect a more conservative approach.

Table 3 summarizes the ITE trip generation for both the residential and retail trips, the reduction for transit, walking, and bicycling to the residential trips, and the net vehicle trips for the average weekday, the weekday morning peak hour, and the weekday evening peak hour. After applying the reductions, the project is expected to generate 128 vehicle trips per day, eight (8) vehicle trips during the morning peak hour and 18 vehicle trips during the evening peak hour. The calculations and trip generation summary presented in Table 3 appear to be accurate.

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<sup>1</sup> ITE Trip Generation Handbook, 3<sup>rd</sup> Edition

The Memo indicates that the projections presented in Table 3 represent a conservative scenario, as the proposed project will have only six (6) parking spaces for residents, which would lead to most residents not having vehicles and relying on alternative forms of transportation. While EP agrees that many residents will likely use alternative forms of transportation as reflected in the above trip reductions, we do not agree that there is a direct correlation between the Applicant's proposed number of parking spaces and the number of vehicles that realistically may be owned by residents, nor does the project as currently proposed meet the zoning requirements for parking spaces as discussed in Walker Consultants' Parking Peer Review. As such, we recommend removing this statement from the Memo.

#### COVID-19 Disclaimer

The reduction in trip generation relies heavily on the assumption that many residents will use public transportation. While EP agrees with this assumption, public transportation ridership trends are unclear due to the COVID-19 crisis. Although one would assume ridership will return at some point in the future, as this crisis is ever-changing, there has yet to be a determination as to how this will be affected long-term.

#### Trip Generation Comparison

VAI compared the proposed trip generation from Table 3 to the existing site trips estimated using LUC 932 – "High Turnover (Sit-Down) Restaurant" for the weekday daily site trips and the TMCs collected in February 2020 for the weekday morning and evening peak hour site trips. Table 4 summarizes the comparison between the existing and proposed vehicle trips, which indicates a reduction in trips for the weekday daily and weekday evening peak hour, and an increase of four (4) trips during the weekday morning peak hour. Based on the available information, the calculations and summary presented in Table 4 appear to be accurate.

Table 4 includes a column to compare the existing site trips to the proposed site trips based on the proposed number of parking spaces (six) rather than the trip generation, which indicates an even smaller number of net new trips. For the reasons outlined above and discussed in detail in the "Parking Conditions" section below, we recommend relying on the trip generation projections only.

#### Trip Distribution and Assignment

VAI determined the trip distribution of the project-generated trips based on journey-to-work data. The trip distribution is summarized in Table 5 and Figure 6. Figure 7 graphically depicts the trip assignment for the weekday morning and evening peak hours. EP agrees with this methodology and the figures are accurate.

#### Future Build Conditions

VAI developed the 2027 Build conditions by removing the vehicle volumes associated with the existing site (i.e. the collected traffic volumes entering and exiting the site driveways which were then distributed through the intersection of Harvard Street at Kenwood Street using the trip distribution), and adding the vehicle volumes generated by the proposed project. Figures 8 graphically depicts the 2027 Build weekday morning and evening peak hours. EP agrees with this methodology and the figure appears to be accurate.

VAI summarized the peak hour projected traffic volume increases outside of the study area in Table 6. The table shows the 2027 No-Build and 2027 Build traffic volumes for the morning and evening peak hours, as well as the traffic volume increases over No-Build and the associated percent increase for each of the following locations: Harvard Street, north and south of Site Driveway, and Kenwood Street, west of Site Driveway. The calculations in the table appear to be accurate. EP notes that the volumes shown for “Harvard Street, south of Site Driveway” are the actually the volumes south of Kenwood Street (not between Kenwood Street and the Site Driveway); consider revising the table for consistency.

As indicated in Table 6, Kenwood Street is expected to experience a traffic volume increase of up to 15%, which could be considered significant, particularly on a low-speed, residential roadway. While EP recognizes that the volumes are relatively low and likely will not affect traffic operations, there may be a more general concern for adding cut-through traffic through the neighborhood, as discussed in detail in the “Recommendations and Conclusions” section at the end of this memo.

## Traffic Operations

VAI used Synchro software, which is based on the Highway Capacity Manual (HCM) methodology, to analyze each of the study intersections (Harvard Street at Kenwood Street, Harvard Street at Site Driveway, and Kenwood Street at Site Driveway). The Memo did not indicate the use of this software other than the outputs provided in the appendix, and as such it is unclear what version of Synchro was used. EP recommends including this information.

Typically, EP performs traffic observations during peak hours as part of the peer review process to compare to the traffic analysis results (vehicle delay and queuing). However, due to the COVID-19 crisis, traffic operations are not typical at this time, and therefore we were unable to observe typical operations during our site visit.

Table 7 presents the results of the capacity and vehicle queue analysis for the study intersections. The table appears to be accurate based on the provided outputs.

EP would typically recommend including the conflicting pedestrians in the analysis for the Harvard Street northbound left-turn and southbound right-turn movements as there are a significant amount of pedestrians on the Kenwood Street approach. However, given the acceptable Level of Service and the likelihood that the delay will not increase significantly due to conflicting pedestrians, alterations do not appear to be necessary. Otherwise, EP agrees that the intersections operate at an acceptable level of service, and as there are relatively few vehicles being added to the roadway network as part of the Build condition, the delay will likely be negligible.

## Parking Conditions

The project as currently proposed will provide six (6) parking spaces for both residential and retail use. As previously referenced, while EP agrees that many residents will likely use alternative forms of transportation, we do not agree that there is a direct correlation between the Applicant’s proposed number of parking spaces and the number of vehicles that may be owned by residents.

It should be noted that the low parking supply relies heavily on the assumption that many residents will use public transportation. While EP agrees with this assumption, public transportation ridership trends are unclear due to the COVID-19 crisis. Although one would assume ridership will return at some point in the future, as this crisis is ever-changing, there has yet to be a determination as to how this will be affected long-term.

If only six (6) parking spaces were to be proposed and/or used, there would likely be many other residents who could potentially own vehicles and would have to find other parking opportunities in the Town, contributing to the already limited parking capacity. Additionally, as indicated in Walker Consultants' Parking Peer Review, the proposed project does not meet the zoning requirements or even Census Data Tracts for parking spaces. The parking requirements necessitate further discussions in addressing comments identified in Walker Consultants' Parking Peer Review.

## Transportation Demand Management Plan

EP reviewed the Transportation Demand Management (TDM) Plan prepared for this project, dated May 2020. We offer the following comments:

- Public Transportation - The "Trains" section indicates the MBTA Green Line Station at Harvard Street and Commonwealth Avenue is 100 feet away; the station is 1000 feet away, please revise the typo.
- On-Site Parking – please see comments above and Walker Consultants Parking Peer Review
- Curb Cuts/Pedestrians
  - The TDM indicates that removing the curb cut on Harvard Street improves conditions by making it safer for pedestrians and bicycles as cars will not be crossing the sidewalk and bike lane to enter and exit the site. In our opinion, there are both advantages and disadvantages to a curb cut on Harvard Street versus Kenwood Street as proposed, which are discussed in detail in the "Recommendations and Conclusions" section below.
  - The TDM indicates that removing the Harvard Street curb cut also provides an improvement in the addition of one metered parking space/loading zone. Though there is a benefit to having an additional metered parking space/loading zone on Harvard Street, the proposed conditions reduce the parking on Kenwood Street, resulting in a balance of parking rather than a parking gain. Under existing conditions, there is approximately 40 feet between the crosswalk across Kenwood Street and the existing curb cut on Kenwood Street that allows for one legitimate parking space; aerial photography shows two vehicles parked at this location, with one vehicle parked in an illegitimate parking space as it is too close to the intersection. Under proposed conditions, in order to meet sight distance requirements, EP recommends prohibiting parking in this area. As such, the proposed condition adds one metered parking space on Harvard Street and removes one legitimate parking space (and in some instances an additional illegitimate parking space) on Kenwood Street.
- Traffic Pattern – the Memo indicates that removing the curb cut on Harvard Street is a significant improvement to the traffic pattern as vehicles will no longer conflict with

pedestrians and bicycles at the curb cut location, as described in the previous bullet. EP does not necessarily agree that this is a significant improvement to the traffic pattern. There are advantages and disadvantages to a curb cut on Harvard Street versus Kenwood Street as proposed, which are discussed in detail in the “Recommendations and Conclusions” section below.

- Deliveries/Rideshares – one existing parking space and one new parking space are proposed along the Harvard Street side of the building for FedEx, UPS, Uber, and loading uses from 7am to 10am and metered parking during all other times. It is unclear where such uses (FedEx, UPS, Uber, and loading) will be positioned during the remainder of the day. Clarification is requested.

## Recommendations and Conclusions

VAI indicated that the following specific areas have been evaluated as they relate to the project: i) access requirements; ii) potential off-site improvements; and iii) safety considerations. Although EP agrees with some of the conclusions, such as the seemingly low impact to traffic operations, we are of the opinion that the three specific areas as listed by VAI overlap and require further consideration.

The Applicant proposes to remove the Harvard Street curb cut and to maintain the Kenwood Street curb cut as the only site access. Although not discussed in the memo, an alternative option would be to maintain the Harvard Street curb cut and remove the Kenwood Street curb cut. There are advantages and disadvantages to both options that we outline below for consideration in order to establish the option that is best suited for both the Town and the residents.

### Kenwood Street Curb Cut Option

Due the configuration of the surrounding roadway network, the Kenwood Street curb cut would require all residents exiting the site to travel along Kenwood Street away from Harvard Street, along Columbia Street, and then along one of the other residential roadways to circulate back to Harvard Street in order to access points to the north and south of the project area, adding an additional two to three minutes of inconvenience to their commute.

While there is no history of speeding on Kenwood Street under existing conditions, the roadway contains smaller residential properties within what is perceived as a neighborhood. In contrast, the proposed 30-unit mixed-use development faces Harvard Street and does not appear to be integrated as part of the Kenwood Street neighborhood but part of the more urban Harvard Street corridor. One could speculate that this urban-type development in combination with the inconvenient and long travel route for exiting motorists (travelling away from Harvard Street only to achieve Harvard Street access elsewhere) could potentially lead to driver frustration, and on occasion, result in isolated instances of higher speeds. If this frustration were to be experienced, it could in turn have an impact on pedestrian safety, particularly where local residents may cross the street at unmarked locations to access Coolidge Park. Provisions for additional traffic calming along the cut-through route of exiting motorists may be considered to mitigate the condition if required.

Alternatively, driver frustration could lead to violation of the one-way restriction to quickly access Harvard Street from Kenwood Street. Based on the TMCs, one (1) vehicle out of 11 exiting vehicles

during the weekday evening peak hour took an illegal left-turn from the Kenwood Street curb cut. Without a physical restraint or enforcement, one could speculate that some residents of the proposed project may violate the one-way restriction, posing a safety hazard to unexpected pedestrians and vehicles turning onto Kenwood Street from Harvard Street.

Regarding sight distance, the available sight distance from the Kenwood Street curb cut is limited due to its proximity to the intersection of Harvard Street at Kenwood Street. The minimum sight distance requirements may or may not be met depending on the vehicle speeds at this location, which have not been documented. As a result of our recommendation to prohibit parking between Harvard Street and the site driveway to allow for optimal sight lines, one (1) legitimate parking space will be lost along Kenwood Street while one (1) new parking space will be gained on Harvard Street. While this new parking space as well as an existing parking space will accommodate FedEx, UPS, Uber, and loading uses from 7am to 10am, clarification is requested regarding where such uses will be accommodated during the remainder of the day.

Due to the limited sight distance for the Kenwood Street curb cut, EP recommends mitigation to tighten the corners of the Harvard Street at Kenwood Street intersection to reduce vehicle speeds turning onto Kenwood Street. This would also shorten the crosswalk across Kenwood Street resulting in minor pedestrian improvements for the current heavy pedestrian volume as well as the pedestrians generated by the proposed site. As part of this improvement, Americans with Disabilities Act (ADA) compliant pedestrian ramps would be required. Once designed, EP requests vehicle turning templates to verify the proposed corner radii are sufficient for turns onto Kenwood Street.

As discussed in the TDM, EP agrees that maintaining the Kenwood Street curb cut and removing the Harvard Street curb cut would provide an improvement for pedestrian and bicycle safety at the location of the Harvard Street driveway. The conflict would be relocated to the intersection of Harvard Street at Kenwood Street for the additional turning vehicles to access the site, where a pedestrian or bicyclist would more likely expect a conflict than at a driveway. Additionally, the pedestrian/bicyclist conflict would only occur with entering vehicles, as exiting vehicles will travel along Kenwood Street away from the intersection.

EP notes there is also an advantage to reducing the curb cuts along Harvard Street, which is a busy urban principal arterial, and includes many pedestrians and bicycles.

#### Harvard Street Curb Cut Option

Though not discussed in the Memo, EP notes there would be advantages and disadvantages to maintaining the Harvard Street curb cut, rather than the Kenwood Street curb cut.

The primary advantage to maintaining the Harvard Street curb cut would be to eliminate the requirement for every vehicle exiting the proposed site to cut through the residential neighborhood, thereby addressing the additional safety concerns outlined above.

Depending on the location of the curb cut along Harvard Street, it appears there would also be adequate sight distance. The location of the bus stop just north of the site would allow for clear sight lines from the driveway except for the short periods of time when a bus is at the stop, and would likely not require a reduction in parking spaces along Harvard Street. As the Kenwood Street

driveway would be removed, this condition would also allow for additional parking along Kenwood Street.

In contrast to the Kenwood Street curb cut, however, maintaining the Harvard Street curb cut would provide a conflict between both entering and exiting vehicles from the site, and pedestrians walking along the sidewalk and bicycles in the bicycle lane at the driveway. This conflict is less desirable at the driveway than at an intersection where the conflict may be more expected.

### Summary

As there are advantages and disadvantages to both curb cut locations, both locations would be feasible provided further mitigation is considered. EP therefore defers to Town officials and local consensus as to which driveway location better suits the needs of the Town and its residents.