



March 30, 2026

Mr. Neil Magenheim  
Chair, Andover Planning Board  
36 Bartlett Street  
Andover, MA 01810

**Re: Technical Traffic Review  
Proposed 100 Old River Road Development**

Dear Chair Magenheim,

Kimley-Horn was retained by The Andover Companies and has completed an initial technical review related to the traffic studies completed in relation to the proposed residential development at 100 Old River Road, also referred to as The Commons at River Road. We have prepared this comment letter on behalf of The Andover Companies.

The development is proposed to occur on the west side of Old River Road in the southwestern quadrant of the River Road/Old River Road/Federal Street intersection. The development is proposed to include the construction of 432 housing units, is a 5-story structure and provide 648 parking spaces with most within a parking garage. In addition, that approximately 2,750 square feet of commercial space is also proposed. The addition of commercial space in this zone enables the applicant to pursue a larger residential project.

As part of the Kimley-Horn review, the adequacy of the applicant's traffic study in terms of:

- study area and analysis locations,
- data collection
- network development
- trip generation and traffic assignment
- traffic analysis
- conclusions, and
- proposed mitigation

As part of this review, the following information was reviewed as part of this effort:

- Traffic Impact Assessment, November 2025, prepared by Vanasse and Associates, Inc. (VAI),
- Traffic Impact Assessment Supplement, February 27, 2026, prepared by VAI,
- Initial Traffic Peer Review, March 19, 2026, prepared by Apex,
- Response to Traffic Peer Review No. 1, March 25, 2026, prepared by VAI,
- Comment Letter, March 19, 2026, prepared by Andover Department of Public Works,
- Overall Site Plan, Revision 1 Dated March 3, 2026, prepared by Bohler Engineering,
- Project Narrative: The Commons at River Road, prepared by SV+partners, and

- Planning Board Project Presentation Slide Deck, for February 24, 2026 hearing, prepared by the Applicant.

A field visit was conducted March 18, 2026 during period of 3PM to 6PM to become familiar with the study area in general and observe traffic flow conditions during that time period. The following was noted as a result of the field visit:

- The I-93 northbound (NB) movement during that time period has high volume, high levels of congestion illustrated by the slow movement from 3PM on,
- The I-93 NB mainline flow and its constraints have a major impact on the NB on-ramp from River Road creating queuing that extends on the ramp, along River Road with queues reaching Old River Road creating a few hundred feet of queuing on Old River Road. The following illustration depicts the peak period vehicle queuing (in red) that occurs. This condition not only impacts Old River Road but also the traffic signal operations at the River Road/Old River Road/Federal Street intersection. That condition occurs with an empty office building at 100 Old River Road and without the proposed new development.
- Based on our discussions, the vehicle queuing that does occur and potential conflicts between vehicles driving towards the I-93 NB onramp and those attempting to avoid that movement, motorists on Old River Road to an extent are using the thru/left turn lane on the approach to the signal for turning right onto River Road. This can create another set of safety problems related to driver expectancy.
- It was also noted that during the PM peak period, the westbound vehicle queue extended on River Road from the Old River Road intersection to beyond the traffic signal at the high school, approximately one half mile to the east.



In general, the traffic study completed by the Applicant's traffic engineer (VAI) followed the accepted practices and guidelines published by the Institute of Transportation Engineers (ITE) and the Massachusetts Department of Transportation (MassDOT). However, there are questions pertaining to analysis assumptions and some of the conclusions as noted below.

We concur with the study area and traffic data collection that provides the basis of the traffic impact assessment. In addition, we agree that the trip generation estimates for the proposed residential development for the peak hours are consistent with the current ITE models used. Areas of question and comment are as follows:

**Inclusion of existing vacant office building**

We occur with the Town and its peer review consultant that have indicated that assuming the currently vacant office building in the analysis is not appropriate. While the building exists and the zoning allows it to be re-occupied, it has been largely vacant or little used for years. The supplemental analysis prepared by VAI addresses this issue. Obviously, the impact of the new development will be experienced a little more given the long time vacancy.

**Potential commercial use assumptions**

As a result of the MBTA TOD zoning requirements imposed on the communities served by the MBTA, the town created these high density residential zones to encourage and simplify the development of these uses. The designation included this subject location. The inclusion of commercial uses as part of the development allows a somewhat higher density as proposed with an additional 96 units of housing. The traffic study assumed 2,750 square feet (sf) of "commercial" space and used a general retail assumption. The analysis used ITE Land Use Code (LUC) 822 (shopping center < 40,000 sf). The analysis assumed both internal capture trips and passby trips. These two factors will affect (i.e. lower) the estimate of "new" site generated trips and is reasonable practice to consider.

The most significant question we have in relation to the assumed commercial use is that without knowing exactly the type of tenant, why would VAI assume one of the lowest types of generators for analysis purposes. It would be more prudent to be more conservative and at worse, present a range of uses or incorporate the highest generator for analysis purposes. With a size of 2,750 sf, this would accommodate a café/coffee shop, possibly two smaller tenants such as sub shop, fast food type of use or other higher generator specific retail uses. If a coffee shop (LUC 936) did become a tenant, the trip generation would be as high as 250 driveway trips in the morning and about 110 in the evening. If the use included a smaller coffee shop (LUC 936) and a small fast food use such as a sub or sandwich shop (LUC 933), the trip generation could be estimated to be about 180 driveway trips in the morning and nearly 100 in the evening. In both these cases, the amount of potential trip activity is substantially higher than what has been assumed in the current VAI analyses. If the amount of commercial square footage becomes larger, then it becomes more of a potential impact.

It is easy to see that reasonable tenant assumptions for the commercial space that could meet needs of the business parks located off Old River Road, the residents of the proposed development, and

also attract traffic from River Road, would be substantively higher in trip generation than the use assumed in the VAI studies.

While any commercial/retail use other than office will potentially reflect some characteristics of internal capture and passby traffic, all vehicle trips will affect the site driveway. If the passby trip is from River Road, then the trips will be a new trips (entering plus exiting) Old River Road. Additional trips and turning movements at the intersection of Old River Road with River Road could potentially affect the results shown in the studies to date or it could exacerbate the queuing issues discussed above.

It is our opinion that VAI should provide more discussion in regard to the proposed commercial space and that the analysis be updated to take into consideration a more realistic and appropriate assumption of the commercial tenant space that may also serve to be more conservative for the analysis. The different assumption would require additional traffic analysis as well as more parking supply review.

#### **Level of Service (LOS) and Operations Analysis**

The analysis of existing conditions and then through the future conditions analyses does not reflect the reality of what is taking place on multiple days per week during the afternoon peak travel periods in relation to the I-93 NB on-ramp and its effect on traffic flow. The analysis presented by VAI indicated that there is no vehicle queue that occurs along River Street and Old River Street from the NB on-ramp. This problem was observed by Kimley-Horn during the site visit and noted by both Apex and the Andover Department of Public Works.

The VAI discussion does not recognize any issue as mentioned above until its most recent response to the Town's peer review comments dated March 25, 2026.

The typical LOS analysis tool used in the analysis will not accurately reflect this condition as the right turn lanes are designated to operate as a "free" right turn under YIELD control. A simulation tool (SimTraffic or Vissim) may be able to model more accurately the condition. However, if it is recognized by all that a significant issue exists that can affect traffic flow and safety, then the focus can be placed on solutions rather than time spent on modeling analysis.

#### **Parking Analysis**

The Applicant has asked for a waiver to reduce the provided parking supply to 648 spaces in total. While the use of 1.5 spaces per residential unit appears reasonable based on regional planning agency (MAPC) studies over the past decade, the Town may want to request a time of day parking demand analysis be completed by the Applicant to demonstrate the available of parking spaces for both land uses during the day and that a reduction in required spaces will be acceptable. The assumed type and size of the commercial use should be considered and taken into account for this analysis.

**Proposed Mitigation**

On behalf of the Applicant, VAI has presented a series of actions that represent both project mitigation and anticipated corridor related improvements that are part of the Phillips Healthcare and the cGMP facility at 300 Minuteman Road projects.

The proposed project mitigation as part of The Commons project as outlined in the VAI documents include:

- A new, short sidewalk section along Old River Road connecting the project with Campanelli Drive with an enhanced street crossing with Rapid Rectangular Flashing Beacons (RRFBs) installed.
- Where applicable, ADA compliant ramps will be installed.
- On-site bicycle parking will be provided – both external spaces and internally protected spaces for its residents.
- Information on the local transit services would be provided to residents and in the lobby of the building

Aside from the above, there is not any further mitigation proposed by VAI specific to this proposed development. At this time, the corridor signal system timing improvements that is discussed in the VAI documentation associated with the Phillips Healthcare project have not been implemented. There is no information on when that will be completed. More information should be provided on that improvement. However, based on our understating, that project will not address the traffic operations issues related to the I-93 NB on-ramp with both River Road and Old River Road.

It is recommended, at a minimum, that VAI evaluate the River Road/Old River Road/Federal Street intersection from a safety perspective and the fact that PM period vehicle queues exist from the I-93 NB onramp all the way back on to several hundred feet of Old River Road. This is likely to require some geometric modification to the intersection and a resulting change to the traffic signal control plan.

Additionally, if more intense commercial uses are assumed for the development project, is there a need to reconsider the design of the site's first intersection with Old River Road? Specifically, is there a need for some form of bypass lane on Old River Road at the site drive so vehicles waiting to turn left do not create new delays to existing business park motorists?

**Potential Grant Application**

In relation to the discussion of grant funds and the possible grant application, there are many questions. First and foremost, what the application would entail is undefined. What is the proposed application to cover? There is no definition of a project that would be part of the grant application. Second, offering to assist the Town is preparing a "One-Stop" grant application can be appreciated but it is a low cost (if any) contribution to the Town as a form of mitigation. Third, the next grant application is due approximately on June 1 with potential award noticed by the end of 2026. Notwithstanding the lack of defined project and therefore, not knowing the type of and amount of grant being applied for, it would appear to make it difficult for the Planning Board to make an informed

decision in approving this development at this time. Lastly, there are only chances of being awarded a grant. What is the consequence of not being awarded a grant in 2026?

It is our suggestion that the mitigation and a project eligible for grant funding be more thought out and defined prior to approval of this development. If the intersection of River Road/Old River Road/Federal Street were to be modified for safety and traffic flow purposes, that would be an example of a project eligible for the State's grant funding based on our past experience.

On behalf of The Andover Companies, we appreciate the opportunity to provide comments on this matter. If there are any questions or the need to discuss them in more detail, I would be happy to make myself available.

Very truly yours,

**KIMLEY-HORN AND ASSOCIATES, INC.**



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