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May 16, 2022

***By Electronic Mail***

Carolyn Britt, Chair  
Planning Board  
Town of Ipswich  
25 Green Street  
Ipswich, MA 01938

**Re: 55 Waldingfield Road — Ora, Inc. Proposed Development — Traffic**

Dear Chair Britt and Members of the Board:

I write on behalf of the Friends of Waldingfield to highlight the serious unanswered concerns that persist regarding the significant adverse impacts on traffic and neighborhood character that will occur if the Board approves Ora's application and permanently authorizes "business offices and conference center" uses at 55 Waldingfield Road.<sup>1</sup> These concerns were only further amplified by the recent Waldingfield Road Walk on April 23, 2022.

I also write to reiterate that the Board currently lacks *any* information about the additional traffic that 75,000 square feet of business office space will generate if used in future in the industry-standard manner of 200 square feet per employee. This would result in potentially triple the number of employees Ora currently proposes.

While property owners come and go, Ora is asking the Board to *permanently* authorize the use of a residential property in a residential zone for business office uses. Before making such a decision, the Board should carefully consider the long-term interests of the neighborhood and the general public and obtain an independent analysis — funded by Ora — of the potential *maximum* projected traffic impact from such a change.

**I. Serious Unanswered Concerns Persists Regarding the Significant Adverse Traffic Impacts to Pedestrians, Cyclists, and Riders on Waldingfield Road**

The expert testimony from Professor Robert Yaro and dozens of letters from the general public have already demonstrated that even under Ora's *own traffic study* predicting

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<sup>1</sup> Determining the impact of a proposed project on both traffic and neighborhood character is a mandatory requirement of the Town's special permit bylaw. Zoning Bylaw, Section IX.J.

500+ new trips per day, the impact on the non-automotive users of the Road will be adverse and significant.

The well-attended Waldingfield Road Walk last month amply demonstrated why these concerns about the impact of increased traffic on pedestrians, cyclists, and riders persist. Ora-generated traffic, combined with the Road's narrow width, absence of sidewalks, limited sightlines, and blind corners, will lead to a significant decrease in safety, and will materially degrade the character of a historic Town-designated scenic road. As detailed in Professor Yaro's written testimony of January 26 and February 7, none of the standard mitigation measures for safely managing increased traffic – traffic calming, sidewalks, road widening or straightening— are available here, given Waldingfield Road's Scenic Road status.

Can the Board or the Town prevent Waldingfield Road from being used as a cut-through? Probably not. But can the Board prevent Waldingfield Road from becoming a *destination* for hundreds of guaranteed new vehicle trips per day, *adding* to whatever cut-through increases may also occur? Absolutely. This is precisely why the special permit bylaw requires the Board to evaluate carefully the project's adverse impact on traffic, safety and neighborhood character.

***Based upon the evidence in the record before the Board, Ora's proposed development will generate significant and sustained adverse traffic impacts on a designated Scenic Road and to its numerous non-automotive pedestrian, cyclist, and equestrian users. These impacts render Ora's proposed business office and conference center use incompatible with the character of the existing residential neighborhood.***

## **II. The Board Should Require Information About the Potential *Maximum* Traffic Generated by Permanently Authorizing 55 Waldingfield for Business Office Use**

Ora continues to insist that the Board disregard Ora's *own traffic studies* — showing 500+ new vehicle trips per day — apparently on the basis that Ora thinks differently about the “future of work.” Yet the entire purpose of requiring empirical traffic studies is to *avoid* making zoning decisions based upon an applicant's subjective optimistic projections about traffic, which frequently turn out to be inaccurate once the project is built and it is too late.

This concern is particularly critical here, because the change in use would not be limited to Ora. As the Director of Planning has confirmed repeatedly, granting a special permit would *permanently* change 55 Waldingfield Road, authorizing 75,000 square feet to be used for “business offices and conference center” in *any* form, at *any* point in the future, by *any* user. Indeed, given Ora's insistence on how little they themselves are going to use their new offices, it is even more crucial for the Board to protect the long-term interests of the general public by evaluating *maximum* potential traffic impact of the proposed change.

A brief analogy may be helpful. Section 2.2 of the Ipswich Board of Health Septic System Regulations<sup>2</sup> requires most residential septic systems to be built with a flow rate of

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<sup>2</sup> <https://www.ipswichma.gov/DocumentCenter/View/352/Septic-System-Regulation-PDF>

“150 gallons per day per bedroom.” A resident building a six-bedroom house is therefore required to install a 900 gallon capacity system. Yet if that same resident asserted that he currently intends to only use three of the six bedrooms — and therefore he should be allowed to install a septic system with only a 450 gallon capacity —that would be absurd, for obvious reasons. The regulations properly reflect the home’s *maximum potential* usage, not the *current owner’s* proposed usage.

The same principle applies with respect to the *maximum* potential intensity of use and traffic that could be generated by permanently authorizing 75,000 square feet of business office space. As detailed in both my November 29, 2021 and January 26, 2022 letters, and Professor Yaro’s January 26 testimony, nothing prevents the finished project from being sold to a new owner who wishes to utilize the property as a more traditional corporate headquarters. Nor would anything prevent that new owner from utilizing or renovating the already-built 75,000 square feet in accordance with industry average of 200 square feet per office employee. Doing so would more than double (and potentially triple) the number of individuals on site, and increase traffic accordingly.<sup>3</sup>

***The Friends strongly urge that the Board obtain an independent analysis, funded by Ora, of the traffic generated by 75,000 square feet of business office space if it were used in the industry-standard manner of 200 square feet per user. That is the only way for the Board and the public to understand the potential maximum traffic impact of permanently authorizing 55 Waldingfield for business office use.***

Thank you for your consideration of this letter. Please do not hesitate to contact me or my colleague Doug McGarrah if you should have any questions.

Sincerely,



Thaddeus Heuer

Cc (by email):           Ethan Parsons, Director of Planning and Development  
                                  Kristen Grubbs, Town Planner  
                                  Anthony Marino, Town Manager  
                                  Tammy Jones, Chair, Select Board

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<sup>3</sup> Nor would a cap on the number of authorized parking spaces operate to “limit” the additional trips to 500+ per day in such a scenario. A subsequent commercial owner with double or triple the number of employees on site may indeed have the critical mass of employees (which Ora lacks) to run a viable vanpool service, thereby adding constant shuttle van traffic to Waldingfield Road.

Furthermore, as a purely practical matter the Planning Board was informed at its April 28, 2022 meeting that the Town currently lacks sufficient capacity to enforce violations of temporal permit conditions (like noise or working hours); it almost certainly does not have the resources to preclude individuals from utilizing internal access roads on a rural 60-acre site for additional (although unauthorized) parking.