



WalkBoston

June 6, 2008

Secretary Ian Bowles
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Environmental Notification Form (ENF)
Hamilton Canal District, Lowell
MEPA # 14241

Dear Mr. Bowles:

We have reviewed the ENF for the Hamilton Canal District in Lowell, a proposed mixed-use retail, office and residential redevelopment in the historic canal district near downtown. We are pleased that walking and pedestrian facilities are major organizing features of the development. We are commenting because details of this worthy project may need further analysis to serve the needs of pedestrians throughout the city.

WalkBoston is the Commonwealth's leading advocate for pedestrians and safe walking. We work throughout the state encouraging walking, advocating for pedestrian improvements and working for design improvements. We have extensive experience helping residents and local government with pedestrian issues, safe routes to school, and safer street crossings.

Project description

The proposed Hamilton Canal District is located adjacent to downtown Lowell and is bounded on the south and west by Thorndike/Dutton Street, a major arterial into downtown Lowell with relatively heavy traffic. The north boundary of the site is immediately adjacent to the National Park Service Visitor Information Center on Market Street. The development is separated into three parts by the Middlesex, Pawtucket and Hamilton Canals which spread through the site. Considerable vacant land remains where factories were demolished. The few on-site historic buildings will be retained, rehabilitated or rebuilt as parts of larger structures.

The proposal comprises 11 new buildings on 13 acres with 50,000 SF of ground level retail space, 420,000 SF of office space, 600 new housing units and 1800 new parking spaces. Components are designed to blend with the historic city: frontage is lined with retail outlets and on-street parking and pedestrian amenities are key design elements. Building heights will range from 6 to 15 stories, with the tallest structures adjacent to the open space along the canals. A new trial court building is located south of Jackson Street.

A trolley line now arcs through the National Park sites along Dutton Street at the edge of the site. The trolley will be realigned to pass directly through the site over new bridges and right-of-way. The ultimate goal for the trolley is a further off-site extension to the Gallagher Transportation Center's buses and commuter trains to Boston.

We believe that there are five issues that need more detailed exploration:

1. Sidewalk widths and surfaces
2. Canal crossings
3. Signage and wayfinding
4. Access to transit
5. Conflicts with vehicular traffic

Issue 1: Sidewalk widths and surfaces

A rule of thumb for a minimum clear sidewalk width is 5'. A minimum of 8' clear width is preferable in commercial areas. The proposed "Street Types," as detailed by diagrams for this project do not always meet this standard.

- Sidewalk widths of 7' to 10' should be adequate, but these widths are frequently diminished because of lights and signs located on the sidewalk.
- On Street Types 1B, 1C, 2B, sidewalks are 6' wide, but include space for light poles and other streetside elements. As these intrusions into the width of the sidewalk will be centered 20" from the curb line, the remaining clear width of the sidewalk will be 4' - possibly a little less. This does not allow for wheel chairs or baby carriages to smoothly pass each another or other walkers or for people to walk comfortably side by side.
- Street Type 3B permits only a 4' wide sidewalk on one side. This width is not acceptable for foot traffic, as there are intrusions for railings.
- Most of the canalside paths are the responsibility of the National Park Service. The NPS standards for sidewalk widths appear to be somewhat more generous than those designed by the developer and/or the City of Lowell. What happens when the two systems must be integrated, as, for example, where connections between canal paths require walkers to cross the bridges over the Pawtucket and Hamilton Canals?
- How will bicycles be accommodated in the project area? It is not clear whether some of the paths are intended to be multi-purpose, and designed or signed for use by cyclists.
- Walkway surfaces will be made of scored concrete with broom finish. Care should be taken that walkers are not forced to use cobble- or brick-paved surfaces along any part of their routes through the development. All "tree ways" abutting the sidewalks should be crossed by smooth sidewalks at intersections.

Issue 2: Canal crossings

Six bridges and one trestle over the canals will be rebuilt or rehabilitated; two bridges and the trestle are solely for pedestrian use, and the bridge at the Swamp Locks serves only pedestrians and the trolley. The trestle, with rail removed, will be rehabilitated as part of the canalside pedestrian path network and constructed separately from this project.

- The two Hamilton Canal pedestrian bridges appear to connect through the Appleton Mills buildings. Are both bridges part of the pedestrian network? Will walkers have access into and through the buildings?
- The reconstructed bridge at the Swamp Locks will offer a spectacular view of the locks and waterfall at the center of the site. Will the bridge (Street Type 1C) have a wide sidewalk where visitors may stand to view the locks and the waterfall? Will the bridge have extra width to accommodate the continuation of 10' wide canalside paths?
- Will the trolley bridge over the Merrimack Canal also be available for pedestrian crossings? If not, how will pedestrian access be controlled?

Issue 3: Signage and wayfinding

Central to the use of a new pedestrian network are wayfinding directions and signage for pedestrian pathways.

- The central axis of the development will connect the NPS Visitor Center to the Swamp Locks, a highly desirable destination for visitors to the site. Will there be wayfinding signage or pavement markings along this route to help walkers get to the attraction?
- Wayfinding is also essential for the large canalside pedestrian network envisioned for the site. Does the proposed plan include wayfinding on these pedestrian ways, especially in locations where continuation of the path involves turns to cross a bridge?

Issue 4: Access to Transit

We hope that transit will play an important role in connecting visitors and employees to this project and other parts of downtown. Shuttle bus services may be provided through or near the project. Ultimately the trolley will connect downtown Lowell to the Gallagher Transportation Center's buses and trains.

- Will trolley construction be phased into an early stage of development? Can shuttle services be routed through the project for service until the trolley is constructed?
- Will pedestrians be able to reach the Gallagher Center on foot?

Issue 5: Conflicts with vehicular traffic

Through movements by vehicles are minimized by an indirect routing via a large "S" curve on a single street connecting Broadway and Revere Street. Several pedestrian issues remain:

- Jackson Street at the south edge of the development site now serves the large Jackson-Appleton-Middlesex (JAM) parking garage and is being extended to Thorndike/Dutton Street. Where Jackson intersects Revere Street, monitoring will be necessary to determine if traffic and pedestrian signals are warranted.
- The intersection of Jackson Street and Thorndike/Dutton Streets will need to be made safe with traffic signals and countdown pedestrian signals, as it is the replacement for a long-planned pedestrian overpass above Thorndike Street.
- The intersection of Broadway and Thorndike/Dutton Streets will become a primary access point to this development, connecting to a new on-site parking garage and other new underground parking. The intersection may warrant countdown pedestrian signals.

Thank you for the opportunity to comment on this document, which offers great promise for pedestrians. Please feel free to contact us for clarification or additional comments.

Sincerely,

Wendy Landman
Executive Director

Robert Sloane
Senior Planner