

June 7, 2005

Secretary Ellen Roy Herzfelder
Executive Office of Environmental Affairs
Attn: MEPA office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Lowe's of Hadley
Russell Street, Hadley (Route 9)
Environmental Notification Form (ENF)
MEPA No. 13539

Dear Secretary Herzfelder:

For 15 years, WalkBoston has been an advocate for pedestrians throughout the Greater Boston area. We work for improved facilities, programs and safety in our region, and offer assistance to other organizations throughout the state.

The Lowe's of Hadley project is a proposal to add a significant retail facility situated on Route 9 in a suburban setting that is typical of those found throughout the state. We have reviewed the proposal and commented on it because of the importance of its planning concepts to pedestrians and to all of us who live and work in Massachusetts.

In examining this ENF, WalkBoston is concerned that pedestrian access is not given fair and adequate consideration. We are dismayed that no sidewalk along Route 9 is being provided in an area where pedestrian use is likely. We are also concerned that walkway decisions are being deferred to developers without appropriate input by municipal, regional or state agencies.

The ENF for the proposed Lowe's of Hadley mentions pedestrian activities only in passing. It states, "A sidewalk is proposed from Route 9 along the entry drive to separate pedestrian traffic." It also reports, "The regional Bicycle and Pedestrian Transportation Plan contains the goals of integrating bicycle and pedestrian needs into the design of commercial development, and the project incorporates a pedestrian sidewalk." It mentions that the Norowottuck Rail Trail is not far away, though not adjacent to its property, and that the nearest access to the trail is at Mountain Farms Mall.

Without explanations in the text, we are left with the responsibility to determine plans for pedestrians from the maps that are attached. The maps do not detail what is meant by the phrases above, but give some hints. The sidewalk at the entry drive appears to connect the parking lot to Route 9, but no other pedestrian ways are designated on the map. Existing transit services and pedestrian connections to them are not shown, even though there apparently is a bus stop near the existing mall property, because the ENF states, "The project is located on a PVTA Bus Route (B-43)." Sidewalks along Route 9

are not indicated. Paths through the property from the parking areas to the main entrances are not indicated. The connection to the Norowottuck Rail Trail is not indicated, though a review of regional information shows that it crosses Route 9 nearby.

We believe that pedestrian needs should be addressed by the project because the potential exists for pedestrians and bicyclists to come to the project area. The following pedestrian aspects of this project should be considered:

1. The potential for walking to the site from adjacent or nearby areas

This site is on the urban edges of both Northampton and Amherst in an area that is not far from residential facilities that may house many walkers. For example, the site appears to be within about 2 miles of Amherst College, which is only a 40-minute walk for a college student.

We think this raises three areas of question:

- The first is the use of the Norowottuck Rail Trail for access to the site. The trail appears to cross Route 9 not far from the proposed site of Lowe's of Hadley. This trail parallels Route 9 in this area and has become extremely popular. The trail is well-known to local residents as both a source for recreation and, increasingly, as a route for access or commuting to commercial facilities along Route 9. Can the use of the trail be encouraged as a means of access to this site? How? What are the connections between the trail and the site? Will the developer provide physical connections and perhaps signage to encourage this kind of movement?
- The second is sidewalks. The one sidewalk that is proposed connects the building's parking lot to Route 9. At the end of this sidewalk is an appropriate place to locate a Route 9 pedestrian crossing. Pedestrians will expect to be able to cross Route 9 to move between commercial entities, and should be permitted at the proposed new signalized intersection through addition of a pedestrian phase and crosswalks to those signals.
- Third, Route 9 sidewalks could be used as a means of access to the area's commercial facilities and to the site in question. Sidewalks do not exist along much of Route 9 in this area, and are not shown along the highway on the plan for this proposed development. As this area becomes increasingly urbanized, sidewalks will become necessary as a supplemental means of access.
- Fourth, walking to this site raises the question of how to encourage pedestrian activity and perhaps reduce some of the demand for auto traffic on local and state roads. Nearly all state and regional plans call for reductions in auto movement and air quality degradation over time. Providing for pedestrians fits nicely with this goal.

2. The potential for encouraging walking within the site

Encouraging walking within a large development site is seldom a high priority, but pathways for walking should be clearly determined and marked for maximum safety. There are three areas of concern here:

- The first is for pedestrian access to and from public transit stations. Bus service provided by the Pioneer Valley Transit Authority will serve Lowe's of Hadley. The

site is adjacent to the transit line, though neither the route nor existing transit shelters/bus stops are shown on the map. It is clear that the region is taking steps to provide alternative and supplemental access to this site through the use of transit. These regional goals should be encouraged, where possible, by implementation of bus improvements during planning and site development. Bus travel to the site should be encouraged through clear routes and signage and by direct, well-marked paths for pedestrians between transit stops and Lowe's. If the bus shelter/stop is serving other commercial establishments, clear and direct routes and signage from those establishments should be provided. In addition, the future location of a bus stop/shelter facility should be cited on the maps and in the text.

- The second area of concern is for making walking safe within Lowe's vast parking area. Many large shopping facilities do not consider routes for pedestrians to follow to and from the principal entrances. For safety purposes, it may be appropriate to consider paths marked off by lines on the pavement through the parking lots. These paths should of course be signed as well. Such paths would be extremely important if walking between commercial establishments along Route 9 were to be considered and/or encouraged.
- A more substantial change to the site design might be considered which could begin to create a more pedestrian-friendly character for Route 9. In order to enhance access and attractiveness to pedestrians and transit users, the small bank/restaurant building could be placed closer to the street edge with parking placed behind the building, and the Lowe's could also be pulled much closer to the street edge with parking placed behind it. These modifications would greatly reduce the walking distance between the street edge and the building entrances, and would also add interest to the streetscape for pedestrians walking along a new sidewalk.

Thank you for the opportunity to comment on the ENF for Lowe's of Hadley. We hope that our concerns about pedestrians can be addressed as you evaluate the proposal and develop the scope for its EIR.

Sincerely

Ann Hershfang
Advocacy Committee Chair

Wendy Landman
Executive Director