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Re: EOE A No. 13935 - I-91 at Route 9 (Interchange 19) Interchange Improvement Project

12 January 2007

Dear Ms. Johnson:

The proposed expansion of the Route 9/Interstate-91 interchange in Northampton is advertised as being a solution for congestion and hazardous conditions. However, the proponents have not demonstrated that either benefit will result. For bicyclists and pedestrians, the altered interchange would most likely be more dangerous and intimidating, not safer, so calling the project an "improvement" is biased and misleading at the outset. The project would probably result in a large increase, not a decrease, in traffic and congestion, and will negatively impact ecologically sensitive habitat and agricultural land. It should therefore be rejected.

Building, using, and accommodating, automobiles is arguably the most damaging activity humans undertake, with catastrophic environmental consequences ranging from smog and acid rain to habitat destruction, water pollution, and of course global warming. Americans currently drive the equivalent of a round trip to Neptune and back each day, with 1/3 of that amount going to trips of 3 miles or less (source: Federal Highway Administration). Therefore, any sane, rational, and long-term environmental policy must work towards a significant reduction in automobile use, rather than an accommodation of it. The Commonwealth of Massachusetts is currently suing the US Environmental Protection Agency to force it to regulate emission of carbon dioxide – the primary pollutant responsible for global warming. The proposed interchange project, however, will have the opposite effect of increasing greenhouse gas emissions, clearly in contradiction with the commonwealth's larger goal.

One hundred years of history have shown us the impossibility of building our way out of traffic congestion. Like loosening one's belt to cure obesity, building a bigger, faster, more efficient road, bridge, or interchange by design makes it easier for more cars to pass through per minute, day, and year, thus quickly attracting more drivers to use

that route for both necessary and frivolous trips. The result: in a few years (5? 10?), there is more traffic and congestion, not less, and not only on the "improved" roadway, but on most neighboring roads as well. This "induced traffic" effect has been well-documented for decades, and is acknowledged in at least some cases by the Federal Highway Administration (see, e.g., <http://www.fhwa.dot.gov/Planning/itfaq.htm>; Litman 2001, ITE Journal, Vol 71, No. 4, p. 38, also available at [www.vtpi.org/gentraf.pdf](http://www.vtpi.org/gentraf.pdf); <http://www.transact.org/Ca//congestion2.htm>; and [www.sierraclub.org/sprawl/transportation/congestion.asp](http://www.sierraclub.org/sprawl/transportation/congestion.asp)). If expanding capacity to cure congestion hasn't worked anywhere else, why should it work here? The project proponents should address this point fully and explicitly, and explain how the proposed project will be substantively different in this regard than practically all others worldwide in the past century. They should provide a detailed, objective, and realistic accounting of current and projected traffic and levels of service on all affected roadways and intersections, including realistic models of induced traffic and pending and anticipated new retail development in Hadley.

The proponents have cited the Connecticut River Crossing Transportation Study, which concluded in 2004 that a second bridge was not called for, but that improvements to the I-91/Route 9 interchange are. This however is beside the point, insofar as that study also failed to take an expansion's effect on induced traffic and sprawl development into account properly.

The proposed expansion will in fact mainly serve traffic between I-91 and Hadley, where major retail development (pending Home Depot, WalMart, and Lowe's projects) are anticipated to add significantly to the already heavily congested roadway. By temporarily lessening congestion, the project will likely encourage yet more major retail development along Route 9 in Hadley, which will lead to more traffic and renewed pressure to expand the roadway, etc. – the never-ending cycle of sprawl that has led already to a recent widening of the Coolidge Bridge and two widenings of Route 9 in Hadley. Such sprawl development is a death knell for the natural environment (not to mention downtowns, quality of life, and sense of place), as has been extensively documented for many years in countless national and international journals, books, and studies.

Bulldozing Northampton houses, impinging on entire neighborhoods, and paving over acres of sensitive riverside habitat and agricultural land in a futile attempt to relieve traffic congestion thus makes no sense and should be rejected out of hand. Instead, our precious federal tax dollars should be spent investing in our downtowns so residents can walk, bike, or take transit to services, jobs, schools, and shopping; supporting our nearly moribund public bus system; and enhancing conditions for pedestrians and bicyclists.

Sincerely,

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