

BOSTON PRESERVATION ALLIANCE

June 9, 2020

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Gregory J. Galer, Ph.D.

Kathleen A. Theoharides
Secretary of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Attn: Alex Strysky, MEPA Unit (via email)

Re: MEPA Project 16194/Northern Avenue Bridge Replacement Project

Dear Secretary Theoharides:

The Boston Preservation Alliance is Boston's primary, non-profit advocacy organization that protects and promotes the use of historic buildings and landscapes in all of the city's neighborhoods. With 40 Organizational Members, 142 Corporate Members, and a reach of 35,000 friends and supporters we represent a diverse constituency advocating for the thoughtful evolution of the city and celebration of its unique character.

We have been heavily engaged in all Northern Avenue Bridge discussions, including organized committee and task force groups since it was closed to the general public in late 2014, and in regular dialog with a wide variety of community and advocacy organizations, preservation regulators, and national organizations that have shown an interest in this project. The Alliance, in fact, has had discussions on and off with the City about the Bridge going back to 1970s. We hope to continue our strong engagement in order to influence the best outcome possible for the residents of Boston, the adjacent neighborhoods, and the historic resources of the city.

We have reviewed the entirety of ENF filed by the City of Boston on April 28 and wish to share the following comments:

We remain disappointed that the City of Boston failed to uphold its commitment dating back to 1977 and confirmed by several Mayoral administrations that the City would preserve the historic Northern Avenue Bridge, a contributing element of the National-Register-listed Fort Point Channel Historic District (and the bridge itself and the bridge tenders house considered eligible for individual listing in the National Register of Historic Places). Over the course of decades the City has allowed this nationally significant historic structure to effectively suffer demolition by neglect. That unfortunately places us where we are today, and we have resigned ourselves to the fact that given the current deteriorated condition, a preservation option seems neither a prudent nor feasible solution given the costs projected by the City, as much as approximately 50% higher than new construction

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of the design being proposed. Assuming the estimates provided by the City are reasonably accurate, the City's statement regarding Alternative 3 (rehabilitation of existing bridge) in the ENF seems a fair conclusion: "Rehabilitation of the existing bridge is not an acceptable alternative as the cost for conducting the required repairs would be prohibitive." Given the challenges to the City budget today that approach seems hard to justify. It is important to note, however, that if the cost of the new span rises to approach the rehabilitation cost that justification for demolition becomes moot.

Treatment of historic resources is fairly well-considered in this 25% design, once one gets past the loss of the historic span and the tenders house. However, additional details for mitigation are required and should be specified and agreed upon before a Certificate is issued. In light of the fact that this plan proposes demolition of two sites listed in the State Register of Historic Places, it is necessary that the state process assures mitigation is robust, well considered, appropriate, and the City committed to seeing it through despite inevitable budget challenges. While we anticipate a robust federal review through Section 106 of the National Historic Preservation Act, we urge the MEPA assessment be equally specific to assure compliance. Just passing the buck on these issues to the Army Corps of Engineers and Section 106 wouldn't be an appropriate response given the clear requirement for attention to historic resources within the MEPA process.

The proposed reuse of historic elements from the existing bridge includes vertical, riveted lattice columns as light poles and the retention of the center pier as well as its drum and turning mechanism. The latter is proposed as the centerpiece of the lower-level promenade, with the walking surface transparent and the elements within visible and interpreted. While we believe both of these proposals provide good mitigation opportunities to create for the public a connection to the historic span and interpretive benefits, the City must be held accountable for these plans. While we understand at 25% the details are not fully resolved, given so little of the historic bridge will be saved, we must assure that these proposed pieces of mitigation are not lost to scope shrinkage value engineering. In addition the details of mitigation implementation need to be fully reviewed by preservation professionals both on the team and in a review capacity at the Massachusetts Historical Commission and by the general public.

Additionally, we urge that the City be required to salvage, conserve, and plan for display and interpretation machinery from the tenders house before that building is demolished. The open and closing of the historic bridge was uniquely powered by compressed air from the tenders house. This feature should not be erased from history and provides an important teaching opportunity that could align with both a history and STEM curriculum.

The ENF specifies "thorough documentation of the existing bridge" as an element of mitigation, but that documentation requires additional specificity. We know the

City has completed a LIDAR survey of the bridge and has discussed the possibility of augmented or virtual reality experiences being a component of documentation and interpretation. Further details on the documentation and interpretive program for the bridge must be specified – those to be involved in development, timeline, opportunity for public involvement, and a financial commitment. These are essential and necessary components of this project.

Regarding the overall design, we feel that what the City proposes demonstrates a positive evolution from previous versions of this scheme. With the plan to demolish and remove the historic span and bridge tenders house, finding an appropriate way to mitigate those losses in a new design is a challenge. The proposal to reference the historic bridge with a visually defining, newly conceived truss element that reflects but doesn't overly mimic the existing span is an appropriate preservation-minded strategy. The fact that from certain viewpoints the truss element looks very different than the historic but very much recalls that historic span from other angles, particularly at night with the proposed lighting scheme (which we feel is an essential component of the proposal), we feel is a good strategy. This design would provide opportunities through interpretation to mitigate the loss of historic fabric by providing a way to continue to educate the public about the history the former bridge and the Fort Point area. This blend of old and new, with some historic elements incorporated, could be quite successful, although the design at 25% clearly needs a wide variety of refinement and items not specified must be resolved and reviewed further.

The Program for the use of the bridge, and what is driving significant aspects of the design, is a significant flaw in the proposal, and we urge this be addressed in further MEPA review. In particular, the insistence of the City to include transit vehicles within the program for the bridge causes great concern. The most obvious issues are dangerous physical conflicts between pedestrians, bicycles, and vehicles, particularly as the bridge narrows where it meets the adjacent roadway network. However, our concern isn't just the physical challenges presented, it is the lack of justification for vehicle traffic in the first place. Design modifications and refinement to attempt to minimize the physical conflicts is one thing (and we are unclear how this can be done successfully), elimination of the conflicts by removing vehicles we believe is the preferred solution.

When vehicles are part of the bridge's planned use, we take issue with the characterization by the City of the bridge as "people first" and its stated goal in the ENF "to re-establish, for public enjoyment, the connection of the Downtown and the South Boston Waterfront neighborhoods." Vehicles by their nature will reduce that public enjoyment, are inherently anti-people in this context, and will greatly diminish the positive placemaking and environmentally positive aspects of the plan. Even the promenade area below, an amenity to residents if the concept is fully developed, will be negatively impacted by the traffic on the bridge above. The inherent poor environmental aspect of placing buses, vans, and shuttles in close

proximity to pedestrians, bicyclists, and a location designed to attract people to linger and enjoy the waterfront is obvious.

The City's justification for transit vehicles in the program is far from convincing and in this ENF filing unsupported by data. The traffic studies shared with the Mayor's Advisory Task Force are flawed, failing to account for a variety of factors that would further question the justification for a new span to carry vehicles of any sort beyond emergency access. The claims that a dedicated bus lane will "reduce traffic congestion in Downtown Boston" is not supported by the analysis presented to the Mayoral Advisory Task Force. And, as the ENF candidly states "Public feedback received by the MATF indicated that there was overwhelming support for limiting bridge traffic to pedestrians, bikes, and emergency vehicles."

Finally, on the issue of a span designed for vehicles above and beyond the agreed-upon need to provide for emergency vehicles on rare occasions, the city only in recent months has added in a number of public forums a new justification for transit capacity, that being the eventual need to rebuild the adjacent Moakley Bridge, and this new span to be utilized as a "temporary" bridge for regular, public, private vehicle traffic. Curiously, we don't see this argument in the ENF. To design and build this bridge for that long-horizon and short-term eventuality is nonsensical. Additionally, there is great concern in the community that such a "temporary" use will evolve into a permanent use, either due to undue pressure before the Moakley repairs are needed or will continue as such after the theoretical repairs are completed. If there was ever a concern about induced traffic demand it would be in a situation such as here. It's hard to believe that a vehicle-capable bridge won't ultimately find itself with a line of exhaust-spewing traffic.

Finally, on this point of program, we wonder what the possibilities may be for the design and budget if transit is removed from the program. Can the scale of the proposal be reduced, perhaps with one ribbon eliminated, and savings applied elsewhere such as to the phase two and three of the promenade which provide the greatest opportunity for public access to and engagement with the Boston Harbor and Fort Point Channel?

Budget aspects of the ENF are curious and worthy of noting for clarification to the residents of Boston. The ENF Form notes, "The City of Boston is funding 100% of the project," yet the Project Notification Form more accurately reflects information shared on several occasions with the MATF – a funding summary that notes \$10million in federal funding available for the project. Why the discrepancy, and furthermore, how is the gap between estimated cost and available funding to be addressed? Finally, this project is only complete when one all phases of the promenade construction are built. The unfunded phase 2 and 3 give concern, particularly given that they provide the best opportunity for robust placemaking and public engagement with the water, which is barely defined in the ENF. There is no

indication of plans to create direct water engagement, which we believe to be an important, environmentally-friendly opportunity.

In summary, while we believe there are a number of positive aspects to the proposal and it provides an interesting solution to the long-standing problem of a sadly neglected historic structure, there are a number of concerns that require attention and commitment from the City of Boston. We feel the MEPA office should require:

- Justification of the transit program designated for the bridge and modification of the design if this transit need cannot be verified with data showing it will actually relieve traffic as used in justification in the ENF.
- If a transit need can be supported and remains on the bridge, design evolution that will respond to concerns we anticipate from transportation advocates and experts to address obvious dangerous conflicts.
- More specific details and commitments to preservation mitigation beyond provided in the ENF. This includes additional details for the reuse of elements of the historic bridge (vertical members, center drum, tenders house equipment). The interpretive program, including documentation and use of LIDAR survey must be specified.
- Commitment that budget reduction does not negatively impact the required mitigation.

I'd be pleased to answer any questions about our comments and concerns.

Sincerely,



Greg Galer
Executive Director

Cc: Mayor Marty Walsh
Chris Osgood, Chief of Streets, City of Boston
Congressman Stephen Lynch
State Senator Nick Collins
State Representative David Biele
Secretary of State William Galvin
Brona Simon, State Historic Preservation Officer, Mass. Historical Commission
City Councilors: Kim Janey, Annissa Essaibi-George, Michael Flaherty, Julia Mejia, Michelle Wu, Lydia Edwards. Ed Flynn, Frank Baker, Andrea Campbell, Ricardo Arroyo, Matt O'Malley, Kenzie Bok, Liz Breadon
Tammy Turley, Chief Regulatory Division, U.S. Army Corps of Engineers
Ruth Brien, U.S. Army Corps of Engineers
Para Jaysinghe, City Engineer
Fort Point Neighborhood Association
Wharf District Council

Northern Avenue Bridge Task Force members: Rick Dimino, Sara McCammond, Kathy Abbott, Dennis Callahan, Carol Chirico, Senator Nick Collins, Handy Dorceus, Councilor Michael Flaherty, Councilor Ed Flynn, Gregory Galer, Susan Goldberg, Susanne Lavoie, Representative Stephen Lynch, Richard Martini, Bud Ris, Patrick Sullivan, Stacy Thompson
Stacey Beutell, WalkBoston
Becca Wolfson, Boston Cyclists Union