

BOSTON PRESERVATION ALLIANCE

July 2, 2020

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Ms. Tammy Turley
Chief, Regulatory Division
US Army Corps of Engineers
Attn: Ruth Brien
Via email: Ruthann.a.brien@usace.army.mil

Re: NAE-2015-02009/ Northern Avenue Bridge Replacement Project

Dear Ms. Turley:

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 write today in response to your Public Notice dated June 2, 2020, with our focus on the review and consultation to fulfill requirements under Section 106 of the National Historic Preservation Act of 1966 as amended. The Northern Avenue Bridge was determined individually eligible for listing in the National Register of Historic Places by the Keeper of the National Register. Additionally, the Fort Point Channel, the Northern Avenue Bridge, the Bridge Tender's House, and the Fort Point Channel Seawalls are listed in the National Register of Historic Places as contributing elements of the Fort Point Channel Historic District. The proposal for demolition of the Northern Avenue Bridge is most certainly an adverse effect on all of these National Register of Historic Places listed resources.

The Boston Preservation Alliance has 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 recently copied you on our June 9, 2020 letter to Secretary Theoharides, the Massachusetts Secretary of Environmental Affairs regarding, the state MEPA process and the Environmental Notification Form filed by the City of Boston on April 28. Rather than reiterate the entirety of those comments on this project here,

The Otis House
141 Cambridge Street
Boston, MA 02114
617.367.2458

I request that that letter (attached) be considered an integral part our feedback. In this letter, I wish to summarize key components of that feedback and discuss our thoughts regarding the Section 106 process for the Northern Avenue Bridge project.

Despite a variety of formal review and consultation processes (including Section 106) and the City of Boston's commitment dating back to 1977 and confirmed by several Mayoral administrations to preserve the historic Northern Avenue Bridge, the City has failed to uphold this commitment. The "conditional no adverse effect" finding made in the 1989 Section 106 review by the Federal Highway Administration in conjunction with the construction of the adjacent Evelyn Moakley Bridge required the city to complete a Preservation Plan, but the plan produced by the city was at best a non-preservation plan, and no plan for preservation was ever implemented, hence the heavily deteriorated condition we find the bridge in today. Given this poor performance associated with a past formal review process, we must collectively assure that whatever promises and agreements that are made by the city as they relate to mitigation of the "adverse effect" of demolition are both of a level and value proportional to the significant loss of historic resources and are in fact implemented.

One of the City's key justifications for demolition and construction of a new span rather than rehabilitation and repair of the historic span is cost. The city's analysis demonstrated that it was more expensive to repair than construct the new span under consideration. However, as the cost of the proposed new span has evolved and grown, the differential between new construction and rehabilitation has shrunk. As design continues to be refined and cost estimates increase in accuracy it's essential that the USACE keep a keen eye on and publicly assess that delta, particularly keeping in mind that there is a healthy skepticism of the city's estimated costs for repair, which to many appears inflated. Perhaps assessment in this regard should be included in whatever Memorandum of Agreement is developed through the Section 106 process.

The proposed mitigation for loss of the historic resources in the City of Boston's submitted design lacks a level of detail, formal commitment, and explanation that USACE should require before this project is allowed to move forward. We urge a formal consultation process begin as soon as possible with all interested parties (including our organization, the Massachusetts Historical Commission, and a wide variety of community groups and individuals who have been active in the process including the members of the Mayor's Advisory Task Force, groups such as WalkBoston and the Boston Cyclists Union, and individuals including Michael Tyrrell and Steve Hollinger, just to name a few.)

A wide variety of details of the preservation-associated mitigation need to be refined, and clear agreements and commitments made to assure these are requirements. Given the city's past history of upholding preservation-related commitments on this span (see above), it is essential that the preservation-mitigation not just be developed through a public consultation process but that its implementation be a certainty, through whatever budget challenges and "value engineering" occurs through the design, bidding, negotiation, and construction phases of this project.

This mitigation must be considered a requirement – not a nice-to-have but a must-have, an essential and necessary part of this project in order that the city fulfill its Section 106 obligations. Details of this mitigation should be developed and specified in a Memorandum of Agreement that should include participants such as the Massachusetts Historical Commission and other key interested parties. We request to be party to that MOA.

Mitigation must include:

- Complete and thorough documentation of the historic bridge and the tenders house before demolition. The scope of said documentation should be reviewed by the Massachusetts Historic Commission and in consultation with national experts such those at the Historic American Engineering Record division of the National Park Service.
- The reuse of historic materials in the new span including riveted, lattice, box-truss elements as light standards as specified by the city’s plans.
- The center granite pier, its drum and the rotation mechanism contained within not just saved but featured as a visible, interpreted, centerpiece experience for pedestrians.
- Design references to the historic span such as the new truss element proposed, and night-time lighting that is clearly reflective of the historic design
- The saving, relocating within the project, conservation, and interpretation of machinery from the tender’s house. These elements which differentiate the historic bridge and its operation, make the Northern Avenue Bridge rare if not unique.
- A robust, well considered, educational, and engaging interpretive program at the site planned and executed by experienced professionals in this realm, and with opportunity for meaningful public comment and participation in its design. The timeline, general scope, and financial commitment for this element of the project should be clearly specified in the MOA.
- A span that is optimally focused on place-making and pedestrian experience (see below re program and vehicles).
- An ongoing maintenance program for the historic elements that become part of the new bridge and its associated “pavilion” level.

One significant area of the design of the proposed bridge we feel requires additional review and consideration given its impact on historic resources - not just in consideration of the loss of the historic bridge and its associated components but given the historic nature of the area of this bridge. Located within the Fort Point Channel National Register Historic District, the bridge stands adjacent, nearby, and visible to a variety of significant historic resources. The scale of the overall proposed bridge certainly has a negative impact on these historic resources. While we feel that a number of aspects of the city’s design help mitigate that impact, the first step should be to minimize the impact and to justify the need for all elements of this massive piece of construction.

We find without merit, credibility, or supporting data the city's justification and rationale for a major programmatic component of this proposed bridge to be busses, shuttles, or some other form of vehicular transit. Additionally, the introduction of regular traffic of vehicles of any sort is detrimental, in fact directly contrary to the walkability, placemaking, water engagement and other experiences that should be considered essential elements of the mitigation for the loss of historic resources. These are essential characteristics of the historic bridge and their incorporation as important design and programmatic elements of the proposed new span directly mitigate the loss of the historic resource. We urge the Section 106 consultation process to include assessment of the programmatic aspects of the bridge, if they are unnecessarily detrimental to the historic resources of the area, and if they by their very nature impede the directive to minimize impacts or effectively impede the positive nature of mitigation.

In summary, while we believe there are a number of positive aspects to the proposal that mitigate certain aspects of the clear adverse effect to this and neighboring historic resources, there are also refinements to the proposal we believe are necessary for this project to fulfill the requirements of Section 106 of the National Historic Preservation Act. We urge the USACE insist upon a prompt and robust consultation process to move toward an Memorandum of Agreement that would ensure all efforts to minimize and mitigate harm to nationally significant historic resources are made. The proposal as it stands is insufficient in detail and commitment.

Sincerely,



Greg Galer
Executive Director

Enc.

Cc: Mayor Marty Walsh
John Eddins, Advisory Council on Historic Preservation
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

Alexander Strysky, MEPA
Para Jaysinghe, City Engineer
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, Susan Goldberg, Susanne Lavoie, Representative Stephen Lynch,
Richard Martini, Bud Ris, Patrick Sullivan, Stacy Thompson
Stacey Beutell, WalkBoston
Becca Wolfson, Boston Cyclists Union
Elizabeth Merritt, National Trust for Historic Preservation
Mike Tyrrell, Friends of the Northern Avenue Bridge
Steve Hollinger, Fort Point Resident

BOSTON PRESERVATION ALLIANCE

June 9, 2020

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Anthony Ursillo CFA

Peter Vanderwarker

Executive Director

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

The Otis House
141 Cambridge Street
Boston, MA 02114
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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
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Tammy Turley, Chief Regulatory Division, U.S. Army Corps of Engineers
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