

# BOSTON PRESERVATION ALLIANCE

April 7, 2021

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Tammy Turley  
Chief, Regulatory Division  
US Army Corps of Engineers  
New England District  
696 Virginia Road  
Concord, MA 01742  
RE: File No. NAE-2015-02009 -- Northern Avenue Bridge  
Draft MOA

Dear Ms. Turley,

Thank you for the opportunity to comment on the draft Memorandum of Agreement associated with the Section 106 review process for the Northern Avenue Bridge project in Boston. As you know from previous correspondence from us, we have advocated for the preservation of this important historic resource for decades and have been heavily involved in the discussions regarding its future for the past seven years, although details have been short in coming from the city for about a year.

We remain and feel like we must continue to put on record that we are disappointed that the City did not uphold its commitment to preserve the bridge in a Conditional No Adverse Effect finding made back in 1989. We believe avoidable neglect led to the deterioration of this structure and to the sad, ultimate result in which we will lose this historic resource. This history leading us to the current situation should be referenced within the MOA, as noted below, as it is an important aspect of the entire arc of the bridge's life that should be considered part of the rationale for mitigation. Additionally, we remain of the opinion that the program proposed for the bridge which includes regular use by vehicles is inappropriate and a detriment to the historic, pedestrian nature desired by residents of Boston and will reduce the success of the interpretative program, which is an essential element of mitigation.

We offer the following comments on the draft MOA:

- There should be an additional Whereas Clause:  
“Whereas the City of Boston previously agreed in 1989 to develop a preservation plan for the bridge, as part of a Conditional No Adverse Effect finding by the Massachusetts Historical Commission yet has failed to preserve the structure;”
- Section I. Recordation  
The Adverse Effect ruling applies to both the bridge itself as well as the Bridge Tender's House, and the proposed loss of the latter should be more directly addressed in mitigation. We request recordation of the interior of the Tender's

## Executive Director

Gregory J. Galer, Ph.D.

House and its equipment be added to the stipulations: a detailed inventory and photographic documentation as well as clear annotations explaining the role of each piece of equipment in the unique, air-pressure-drive system of the bridge, such materials sufficient to support clear, public interpretation to mitigate the loss of this rare, historic engineering and technological feature.

- Section II. Virtual Reality Application

- Section III. Interpretive Panels

We recommend that the MOA specify “a robust, well considered, coordinated, educational, and engaging interpretive program” more broadly, with the Virtual Reality and Interpretive Panels as subsets. The MOA should have a section “Interpretation and Education” that requires planning and execution be directed by experienced professionals in the outdoor exhibition and interpretive field. The MOA should also require 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. Review and approval by MHC and other parties to the MOA at various stages of development of this interpretive program should be required. We need to assure that the loss is truly mitigated by meaningful, creative, educational, and well-developed interpretive elements.

Additionally, we request language be added that requires long-term financial support of the interpretive program: “The City shall keep the Virtual Reality application current and compatible with operating systems as they evolve for at least 25 years after the virtual reality application is publicly available. Interpretive panels shall receive regular upkeep and maintenance, being replaced if damage cannot be repaired, for at least 50 years after installation.” This language assures a long-term commitment for the general public.

- Section V Reuse of Historic Materials

The MOA should be more specific than “vertical members.” It should specify, “vertical, riveted, lattice, box girders.”

Equipment from the Bridge Tender’s House needs to be inventoried and reviewed with MHC & the Boston Preservation Alliance to determine what is to be saved, conserved, and placed on site for interpretation as part of the overall interpretive program. Key elements of the historic pneumatic drive system shall be retained as elements of the interpretive program.

Conservation and treatment methods for all reused historic material should require review and approval of all parties to the MOA. The MOA should specify that interpreted artifacts shall be maintained and treated to avoid

deterioration for a period of at least 25 years.

- Signatories

We request that that Boston Preservation Alliance be listed as a consulting signatory of the MOA. We also suggest that the Government Services Administration (Carol Chirico. Assistant Regional Council of the GSA), an abutter to the bridge, be invited as a signatory as well.

We look forward to your reply to these suggested modifications to the draft MOA.

Sincerely,



Greg Galer  
Executive Director

cc:

Brona Simon, Massachusetts Historical Commission  
John Eddins, ACHP  
David Robinson, MBUAR  
Jeff Stieb, USCG  
Carol Chirico, GSA  
THPO, Mashpee Wampanoag Tribe  
Bettina Washington, Wampanoag Tribe of Gayhead (Aquinnah)  
THPO, Narragansett Indian Longhouse  
Mayor Kim Janey, City of Boston  
Chris Osgood, City of Boston  
Para Jayasinghe, City of Boston  
Rosanne Foley, City of Boston  
Thomas Keough, AECOM  
Joseph Allwarden, AECOM  
Ben Rosenburg, Silman