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June 19, 2020

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : Northern Avenue Bridge Replacement Project
PROJECT MUNICIPALITY : Boston
PROJECT WATERSHED : Boston Harbor
EEA NUMBER : 16194
PROJECT PROPONENT : City of Boston Public Works Department
DATE NOTICED IN MONITOR : May 6, 2020

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** an Environmental Impact Report (EIR).

While this project may now proceed to permitting and other approvals, I acknowledge the concerns expressed by several commenters with respect to the design of the project, particularly its accommodation of certain types of transit bus travel and impacts on historical resources; these commenters have requested that the project be required to file an Environmental Impact Report (EIR). Based on a review of the Environmental Notification Form (ENF), consultation with State Agencies, and review of comment letters, I do not find that a discretionary EIR is warranted. While the design of the bridge may require further refinement, the project does not exceed mandatory EIR thresholds and the ENF adequately describes the project's impacts and mitigation measures.

MEPA review is not a permitting process; it does not pass judgment on whether a project is or is not beneficial, or whether a project can or should receive a particular permit. Rather, the MEPA process requires public disclosure of a project's environmental impacts as well as the measures that the proponent will undertake to avoid, minimize and mitigate these impacts. MEPA review occurs before public agencies act to issue permits and approvals for a proposed project to ensure that those agencies are fully cognizant of the environmental consequences of

their actions. I encourage the public to continue to participate in the City of Boston's (City) design process and subsequent permitting processes.

Project Description

As described in the ENF, the project entails the replacement of the Northern Avenue Bridge with a stationary bridge and promenade. The existing Northern Avenue Bridge spans the Fort Point Channel (the Channel) and connects Northern Avenue in the Seaport District with Atlantic Avenue in downtown Boston. It is a 643-foot (ft) long, 80-ft wide, four-span steel truss bridge constructed between 1905 and 1908. The center span was designed to swing open (perpendicular to the adjacent fixed spans) to permit navigation between the Channel and Boston Harbor. Travel on the bridge was accommodated by three 22-ft, eight-inch wide vehicular travel bays and six-ft wide sidewalks along each side of the bridge. The bridge was closed to vehicular traffic in 1997 due to structural deterioration. It provided pedestrian and bicycle access until December 2014 when it was closed for safety reasons and left in the open position. The bridge is supported by four piers and two abutments, including a drum pier under the central pivoting section of the bridge; one pier on the west side of the center span; two piers east of the center span; and abutments where the ends of the bridge meet land. Pile-supported wooden fender systems surround the center span of the bridge in its open position and the adjacent bridge pier to the east to protect these structures from vessels navigating through the Channel. A 76-ft wide, 15-22 ft deep (at mean low water) navigational channel is maintained between the center span and the adjacent pier to the east. The Bridge Tender's House is located on piles at the northern end of the pile field. The bridge deck is at an elevation of approximately 16 ft North American Vertical Datum of 1988 (NAVD 88), or approximately 12 feet above the current mean high water (MHW) mark (4.32 ft NAVD 88).

The replacement bridge will be approximately 690 ft long and will vary in width from 63 ft at the west end, to 110 ft at its widest in the middle span, to 44 ft wide at the eastern end. It will be constructed on two abutments and six piers. The deck of the bridge will bifurcate as it passes over the Channel to provide two 24-ft wide sides of the bridge with distinct designs. The northern side of the bridge will be comprised of a 24-ft wide pedestrian zone. The southern side will include a six-ft wide sidewalk, a six-ft wide bicycle lane and a 12-ft shared travel lane for bicycles and buses. The shared travel lane will permit one-way travel for bicycles and certain transit buses from east (the Seaport) to west (downtown Boston) and will be designed to accommodate emergency vehicles.¹ Between the bifurcated sections of the bridge, ramps will lead to a promenade under the main bridge span. The western ramp will be 20 ft wide at the deck surface and widen as it slopes down to meet the promenade. The eastern ramp will be 20 ft wide with a set of steps down to the promenade level. The promenade will be 432 ft long and 80 ft wide when completed. It will be constructed almost entirely within the footprint of the fender system, pile field and Bridge Tender's House. There will be 10 ft of clearance between the promenade level and the bottom of the bridge and the promenade will be approximately 13.5 ft above the current MHW. The promenade will be designed as a passive recreational space with a boardwalk, benches, swings and landscaping.

¹ The ENF indicated that vehicular access to the bridge would be limited to transit buses. During the review period, the City clarified that the bridge would be potentially open to both buses operated by the Massachusetts Bay Transportation Authority (MBTA) and private shuttle buses.

The existing bridge will be removed and transported by barge to Dry Dock 4 in the Raymond L. Flynn Marine Industrial Park in South Boston, where lead and asbestos-containing material (ACM) will be removed. The project will be constructed in three phases. Phase 1 will include construction of the bridge and a 124-ft long section of the promenade. The promenade will be extended to its full length in a subsequent phase. Construction will commence in February 2021 and the bridge and first phase of the promenade will be completed in April 2022.

Project Site

The project site is located at the mouth of the Channel where it meets Boston Harbor. The western end of the bridge is bordered to the south by the James Hook & Company (Hook) site, to the west by a parking area and Atlantic Avenue, and to the north by the U.S. Coast Guard building. The eastern end of the bridge is bordered to the south by Old Sleeper Street and the Barking Crab restaurant, to the east by Northern Avenue and to the north by the John Joseph Moakley United State Courthouse. The site is located less than 200 ft north of the Seaport Boulevard crossing of the Channel on the Evelyn F. Moakley Bridge.

As shown on the Federal Emergency Management Agency's (FEMA) National Flood Insurance Rate Map (FIRM) number 25025C0081J, (effective March 16, 2016), the project site is located in a coastal flood zone with a velocity hazard (VE zone) and a base flood elevation (BFE) of 13 ft NAVD 88. According to the Division of Marine Fisheries (DMF), Boston Inner Harbor is essential habitat for the spawning and juvenile development of winter flounder (*Pseudopleuronectes americanus*), an important commercial and recreational species in the region. In addition, anadromous fish pass through Boston Inner Harbor en route to spawning areas in the Charles and Mystic Rivers.

The Northern Avenue Bridge is listed in the State Register of Historic Places and is located in the Fort Point Channel Historic District, which also includes the Bridge Tender's House, Fort Point Channel and the Fort Point Channel Seawalls. The Fort Point Channel Historic District and contributing elements are listed in the National Register of Historic Places. According to the Massachusetts Historical Commission (MHC), the bridge is one of two triple-barreled swing bridges listed in the statewide bridge inventory and is significant for its role in the commercial development of South Boston.

Environmental Impacts and Mitigation

Potential environmental impacts of the project include addition of 0.57 acres of impervious area and alteration of 42,974 sf of Land Under the Ocean (LUO) and Land Containing Shellfish (LCS), 170 linear feet (lf) of Coastal Bank and 2,590 sf of Land Subject to Coastal Storm Flowage (LSCSF). It will demolish structures listed in the National and State Registers of Historic Places. Demolition activities will potentially have noise, air and water quality impacts associated with construction and lead abatement activities.

The project will restore pedestrian, bicycle and bus connections across the Channel and provide new open space on the promenade. Measures to avoid, minimize, and mitigate environmental impacts include permanent restoration of 3,913 sf of LUO, pedestrian, bicycle and transit facilities across the Channel and enhanced public access to tidelands. The project will include construction-period mitigation measures to minimize impacts to water quality and

marine habitat. Remediation of ACM and lead from the bridge superstructure will be conducted off-site in an industrial area to minimize potential impacts to air and water quality at the urban project site.

Jurisdiction and Permitting

This project is subject to MEPA review and preparation of an ENF pursuant to 301 CMR 11.03(3)(b)(1)(a), 301 CMR 11.03(3)(b)(6) and 301 CMR 11.03(10)(b)(1) because it requires State Agency Actions and, respectively, involves the alteration of Coastal Bank; construction, reconstruction or expansion of an existing solid fill structure of 1,000 or more sf base area or of a pile-supported or bottom-anchored structure of 2,000 or more sf base area; and demolition of all or any exterior part of any Historic Structure listed in or located in any Historic District listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth. The project requires a Chapter 91 (c. 91) License and a 401 Water Quality Certificate (WQC) and from the Massachusetts Department of Environmental Protection (MassDEP) and a Federal Consistency Certification from the Massachusetts Office of Coastal Zone Management (CZM).

The project requires an Order of Conditions from the Boston Conservation Commissions (or Superseding Orders of Conditions from MassDEP in the event the Order is appealed). The project requires an Individual Permit from the U.S. Army Corps of Engineers (ACOE), a National Pollutant Discharge Elimination System Construction General Permit (NPDES CGP) from the Environmental Protection Agency (EPA), a Bridge Permit from the U.S. Coast Guard and review by MHC acting as the State Historic Preservation Officer (SHPO) pursuant to Section 106 of the National Historic Preservation Act (NHPA).

Because the Proponent is not seeking Financial Assistance from the Commonwealth for the project, MEPA jurisdiction for any future reviews would extend to those aspects of the project that are within the subject matter of required or potentially required Agency Actions and that may cause Damage to the Environment as defined in the MEPA regulations.

Review of the ENF

The ENF provided a description of existing and proposed conditions, preliminary project plans, and identified measures to avoid, minimize and mitigate project impacts. It included a Substructure Inspection Report, a structural assessment of the existing bridge (Existing Conditions Report), photographic documentation of the existing structure, a copy of the Project Notification Form (PNF) filed with MHC, an Essential Fish Habitat Assessment and a Sediment Sampling and Analysis Plan.

Alternatives Analysis

According to the ENF, the City identified four goals that would guide the design of the bridge, including improving mobility, honoring history, strengthening resiliency and creating a destination. A Mayoral Advisory Task Force (MATF) was established to identify priorities and evaluate alternative designs. The MATF included elected officials and representatives of local, state and federal agencies, non-profit organizations, community groups, businesses and institutions. As stated in the ENF, the bridge has been designed to promote multimodal access

for pedestrians, bicyclists and certain transit buses and emergency vehicles, but not other types of private vehicles.

The ENF reviewed four alternatives to the Preferred Alternative, including the No Action, Removal Without Replacement, Rehabilitate Existing Bridge and Bridge Replacement Using Existing Pier Footings Alternatives. Neither the No Action nor Remove Without Replacement Alternative would restore multimodal access across the Channel in this location and would therefore not meet the purpose of the project. According to the ENF, the No Action Alternative would likely result in the eventual failure of the structure, which would potentially result in injury, obstruction of navigation and impacts to water quality and marine habitat; the USCG has in the past requested that the existing bridge be removed for these reasons. The Remove Without Replacement Alternative would minimize impacts associated with the potential failure of the existing bridge. Demolition activities would have similar impacts as demolition proposed under the Preferred Alternative, but the Remove Without Replacement Alternative would not provide multimodal access or open space.

According to the ENF, the Rehabilitate Existing Bridge Alternative would preserve as much of the original steel lattice and other original elements of the bridge as possible. While some parts of the existing bridge are in adequate condition and could be reused, the steel members and other structural components that do not meet load carrying capacity would have to be replaced. Rehabilitation would include splicing new steel to the existing steel members and reconstructing pin jointed connections; according to the ENF, it may not be possible to complete this type of complex steel fabrication. In addition, the mechanical components necessary to open and close the bridge would have to be replaced in their entirety. For these reasons, this alternative is not feasible due to the extensive and costly repairs to the bridge that would be required.

The Bridge Replacement Using Existing Pier Footings Alternative would construct a new bridge along the same horizontal and vertical alignment as the existing bridge. After the existing bridge was removed and transported to Dry Dock 4 for remediation, the existing piers would be demolished and three new piers constructed in the same locations. According to the ENF, this alternative is not feasible because the existing footings are 112 years old and reusing them would require ongoing and costly inspection and maintenance would likely have a shorter lifespan than a new structure.

The Preferred Alternative will provide multimodal facilities for pedestrians, bicyclists, transit buses and emergency vehicles. Half of the surface deck of the bridge and the promenade will be reserved for pedestrian use. It has been designed to reflect aspects of the architecture of the existing bridge, retain the drum pier and turning mechanism and incorporate non-structural components of the existing bridge, including the use of lattice columns as light poles. It will remove existing piers below the mudline to restore benthic habitat. According to the ENF, the bridge will have a 75-year design life and will be constructed to be resilient to climate change, including sea level rise.

Commonwealth Tidelands

According to MassDEP, the project will occupy filled and flowed Commonwealth Tidelands. It is considered a water-dependent use in accordance with the Waterways Regulations

(310 CMR 9.00) and presumed to meet the regulatory proper public purpose requirements at 310 CMR 9.31(2)(a). The existing bridge has been authorized pursuant to licenses issued in 1903 and 1904 and the proposed bridge will require a new c. 91 License. The area of the proposed bridge over tidelands, excluding the promenade, will be approximately 51,300 sf, which is slightly smaller than the 52,000-sf area of the existing bridge. The pile-supported promenade will cover (as overhang) 34,560 sf of the Channel, including that portion of the promenade directly under the bridge. The promenade will be constructed almost entirely within the area occupied by the Bridge Tender's House and the dilapidated pile field behind the fender system. The surface of the promenade will be at elevation 18.0 ft NAVD 88, approximately 13.5 ft above the current MHW elevation and over 10 ft above the projected 2070 MHW.

By its purpose, the project will provide many of the public access features that projects are typically required to provide through the c.91 licensing process, including a 24-ft wide pedestrian-only zone on the northern side of the bridge, a sidewalk and bicycle facilities on the southern side, connections to the Harborwalk at both ends and the promenade below the bridge. As described below, the project is consistent with planning efforts to promote waterfront access. In addition, the project will maintain the existing 76-ft wide navigational channel on the east side of the drum pier and match the vertical clearance provided by the Evelyn Moakley Bridge to the south.

The bridge is adjacent to three areas for which the City has developed Municipal Harbor Plans (MHP), including the Downtown Waterfront District MHP, the Fort Point Downtown MHP and the South Boston Waterfront District MHP. All three MHPs acknowledge the opportunity provided by the bridge to promote waterfront access by providing connections between the Seaport and downtown Boston and frame potential water-dependent and cultural activities within the Channel. The project will provide pedestrian and bicycle facilities and a unique public open space that will enhance waterfront access to the Channel and Boston Harbor. As recommended by CZM, as the project design is finalized, the City should consider how the bridge may further enhance the public's enjoyment of the waterfront with interpretive, historic, and educational signage and programming, gathering areas for public tours or other gatherings, pedestrian amenities, and water-related programming. Signage, street furniture, lighting and pedestrian and bicycle facilities should be designed to be consistent and cohesive with other public waterfront facilities such as the Harborwalk. The proposed ramp to the Harborwalk at the western end of the bridge will provide a critical accessible link to the downtown Boston Harborwalk.

Wetlands, Water Quality and Aquatic Habitat

The project will impact 42,974 sf of LUO, 2,590 sf of LSCSF and 170 lf of Coastal Bank. The project will remove existing piers and cut existing pilings to two feet below the mudline; according to the ENF, this will result in a net increase 1,425 sf of LUO that is not impacted by structures. I note that MassDEP recommends that the pilings be entirely removed rather than cut below the mudline; removal of the pilings will be evaluated further by MassDEP in the WQC and c. 91 reviews of the project. Approximately 2,407 cy of sediment will be dredged in connection with the construction of new piers, reconstruction of the abutments and removal of existing piers.

The ENF included a sediment sampling plan submitted to MassDEP that proposed to collect six samples which would be analyzed for physical characteristics and chemical constituents. During the review period, the City submitted initial sediment sampling results to MassDEP that indicated that the sediment is contaminated with arsenic, lead, polycyclic aromatic hydrocarbons (PAH), total petroleum hydrocarbons (TPH) and sulfides. The samples were evaluated using the toxicity characteristic leaching procedure (TCLP), which simulates the extent to which chemical constituents in the sediment would leach through a landfill after disposal. The TCLP results indicated that the sediment likely can be disposed of at a landfill rather than be treated as hazardous waste with more stringent handling and disposal requirements. According to MassDEP, additional post-dredging sampling of the sediment may be required before it is reused or disposed of.

The ENF reviewed construction-period mitigation measures that will be implemented to minimize potential impacts to water quality and marine resources. The bridge demolition and most construction activities will be conducted using barge-mounted equipment. Cofferdams and pilings will be installed using a vibratory hammer rather than pile drivers. In-water construction activities, including demolition and construction of piers and abutments, will be conducted within cofferdams and/or a floating boom with an attached turbidity curtain to contain suspended sediments and other materials. According to DMF, the City has indicated that construction activities will take place on a continuous basis for the 14-month construction period, including during the February 15 to June 30 time period when DMF typically recommends that in-water, silt producing work be avoided to minimize potential impacts to the critical life stages of winter flounder. In addition to the mitigation measures described above, DMF recommends that the City should sequence construction activities such that the most impactful construction activities take place before February or after June, that barges should be prevented from grounding and that turbidity and noise levels be monitored during construction.

Traffic and Transportation

As described above, the project will provide access across the Channel for pedestrians, bicyclists, certain transit buses and emergency vehicles. On the north side of the east and west ends of the bridge, the project will provide accessible connections to the Harborwalk with stairs and ramps, including a pile-supported ramp system at the western end. Bicycle access from west to east will be provided by a 6-ft wide bicycle lane. A shared 12-ft wide travel lane will provide one-way access for bicyclists and buses from east to west. The shared lane would end at an unsignalized intersection at Atlantic Avenue, where buses would be required to make a right turn.

Many commenters questioned the need for the project to accommodate buses. The ENF estimated that 110 buses would travel on the bridge each day, but did not clearly describe the use of the shared travel lane by MBTA and shuttle buses or address the role of the bridge in the local or regional transportation network. The City's Northern Avenue Bridge Project web site included a presentation summarizing the results of a transportation study that was presented to the MATF in 2018.² The analysis considered the use of the bridge for bicycles and pedestrians only and scenarios that also included westbound high occupancy vehicles (HOV)³ and either westbound or

² <https://www.northernavebridgebos.com/meetingmaterialsandreports>

³ High occupancy vehicles include transit buses, shuttles, carpools and taxis.

two-way general traffic. As noted by several commenters, the analysis indicated that the HOV scenario, which most closely resembles the Preferred Alternative, would reduce shuttle travel times to North Station by four minutes but would not significantly reduce congestion or improve traffic operations at nearby intersections. I also received comments noting that transportation studies, including the South Boston Waterfront Sustainable Transportation Plan (SBWSTP), have recognized the benefits of reopening or replacing the bridge for pedestrian, bicycle and vehicular access to downtown Boston and to maintain flexibility for potential future transit use, such as a bus rapid transit (BRT) lane.

While the ENF suggested potential benefits of accommodating bus traffic on the bridge, many commenters have emphasized that the use of the bridge by buses could create potential conflicts with pedestrians, bicyclists and adjacent land uses. Among the issues identified by commenters include the crossing of the heavily-used pedestrian route along Atlantic Avenue by buses turning right onto Atlantic Avenue; requests for accommodation of delivery and service vehicles to Hook and the USCG building; safety concerns related to the shared use of the travel lane by bicyclists and buses; the limited cross sectional area available at the approach to the bridge from the east that must accommodate, in addition to buses, pedestrian connections on both side of the street and bi-directional bicycle traffic; and potential impacts to access and operations of the Moakley Courthouse. Resolution of these design complexities is also affected by the grade change associated with raising the elevation of the approaches to the bridge. I strongly encourage the City to continue to work with the MATF, project abutters and other stakeholders to address these design issues in future permitting and other local approval processes.

Several commenters requested that I require that the City prepare an EIR to justify the inclusion of vehicular traffic on the bridge and to analyze designs that minimize conflicts among travel modes, enhance safety and mitigate roadway congestion. However, a trip generation estimate of 100 buses is far below ENF thresholds, which, in any event, are intended to address new vehicular (not transit) traffic. In general, the addition of new transit facilities can encourage ridership and improve traffic conditions by reducing congestion on surrounding streets; however, the potential for user conflicts and safety particularly for bicycles and pedestrians should be carefully considered prior to final design. As the City has acknowledged, revision or refinement of the design of the project will be necessary to ensure the safe and efficient operation of the bridge for all modes of transportation. I expect and encourage the City to fully engage with all relevant stakeholders to address these issues in future phases of design.

Historical Resources

According to the ENF, the demolition of the existing Northern Avenue Bridge and Bridge Tender's House will have an adverse effect on historical resources. The ENF indicated that mitigation for these impacts include a bridge design that reflects the existing bridge architecture, reusing lattice columns from the existing bridge as light poles on the proposed bridge and documenting the existing bridge. In addition to taking photographs of the existing structure, the City has conducted a three-dimensional laser scan of the bridge that could be used to create a virtual reality educational exhibit. The City has indicated that the drum pier and turning mechanism will remain in place and that it will explore designing the promenade to make these features visible to the public, and that the condition of machinery in the Bridge Tender's House will be evaluated and potentially preserved.

The MHC review process will specifically identify and address potential impacts to historic resources. According to MHC, the City will be required to document the project's impacts on the Fort Point Channel Seawalls and provide additional details on the preservation and treatment of the bridge's mechanical components. I am satisfied that these subsequent procedures will be adequate to address impacts to historic resources.

Climate Change

According to the ENF, the underside of the existing bridge becomes submerged during large storm events. The project design incorporates climate change resiliency features. The City's *Climate Ready Boston* report (2016) projects an increase in sea level of 1.3 ft to 3.1 ft by the year 2070 and up to 7.4 ft by 2100. The project was designed based on a projected increase in sea level of 40 inches by 2070, as recommended by the Boston Planning and Development Agency (BPDA); under this scenario, by 2070 the MHW would increase from 4.32 ft NAVD 88 under existing conditions to 7.65 ft NAVD 88 and the 100-year flood elevation would increase from 13.00 ft NAVD 88 to 13.24 ft NAVD 88.

The project has been designed so that the bottom elements of the bridge over the Channel between abutments will be at or above elevation 14.24 ft NAVD 88 (one foot above the projected 2070 100-year flood level). The approach to the bridge from Atlantic Avenue will be raised by five feet and the approach from Northern Avenue to the east will be raised by approximately four feet. The surface of the promenade will be at elevation 18.0 ft NAVD 88, almost five feet above the projected 2070 100-year flood elevation of 13.24 ft NAVD 88.

Construction

As noted above, the City will conduct in-water work using mitigation measures, including cofferdams and silt curtains, to minimize impacts to water quality and aquatic habitat. The potential for releases of oil and/or other hazardous materials should be minimized by using biodegradable hydraulic fluid in construction equipment where possible and through the development and implementation of a spills contingency plan. The City should notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00) if oil and/or hazardous materials are found during construction. The project must comply with the Solid Waste and Air Pollution Control regulations. I refer the City to the detailed comments provided by MassDEP on procedures for abating lead and asbestos present on the existing structure.

Conclusion

The ENF has adequately described and analyzed the project and its alternatives, and assessed its potential environmental impacts and mitigation measures. Based on review of the ENF and comments received on it, and in consultation with State Agencies, I have determined that an EIR is not required. Remaining issues can be addressed through the local, state and federal permitting and review processes.

June 19, 2020

Date



Kathleen A. Theoharides

Comments received:

05/20/2020	Boston Water and Sewer Commission
05/21/2020	Todd Lee
05/28/2020	Julie Battisti
05/28/2020	Joseph Caruso
05/30/2020	Chris Dippel
06/05/2020	Massachusetts Office of Coastal Zone Management (CZM)
06/06/2020	Massachusetts Department of Environmental Protection (MassDEP)/Northeast Regional Office (NERO)
06/07/2020	Charles Denison
06/08/2020	Amy Walsh
06/08/2020	Paul Swartz
06/09/2020	Steve Hollinger
06/09/2020	WalkBoston/LivableStreets Alliance/Boston Cyclists Union
06/09/2020	Massachusetts Historical Commission (MHC)
06/09/2020	Massachusetts Convention Center Authority (MCCA)
06/09/2020	General Services Administration
06/09/2020	Seaport Transportation Management Association
06/09/2020	Conservation Law Foundation
06/09/2020	Fort Point Neighborhood Association
06/09/2020	Boston Harbor Now
06/09/2020	A Better City
06/09/2020	Boston Preservation Alliance
06/09/2020	Board of Underwater Archaeological Resources (BUAR)
06/11/2020	Anita Johnson
06/16/2020	Division of Marine Fisheries (DMF)

KAT/AJS/ajs

Executive Office of Energy and Environmental Affairs
MEPA Office, Attn: Alex Strycky
100 Cambridge Street, Suite 900
Boston MA 02114



June 9, 2020

Re: EEA No. 16194 Northern Avenue Bridge Replacement Project

Dear Mr. Strycky:

A Better City is pleased to submit comments in support of the preferred design proposal for replacement of the Northern Avenue Bridge. We believe the comprehensive vision presented by the City of Boston is designed in a thoughtful manner and will benefit the neighborhood, the City, and the metropolitan region for future generations.

A Better City holds a proud history of working with the Commonwealth on transportation infrastructure projects, developing traffic management mitigation plans and providing technical assistance for construction projects in the metropolitan-Boston area. The organization was created to assist with the Central Artery/Tunnel Project and as we continue to realize the benefits of that investment, particularly through the creation of the Greenway parks, repurposing of Spectacle Island, and infrastructure improvements to the South Boston Waterfront.

A Better City also currently manages the Seaport Leadership Group (SLG) whose affiliations encompass dozens of large and small businesses, over 1,000 residential homes, several hotels, multiple public open spaces, and multiple civic spaces in the South Boston Waterfront and Seaport area. The SLG meets regularly to identify and support the implementation of transportation solutions and related public realm improvements for the workforce, residents, and visitors to the Seaport. We collaborate with City and State transportation stakeholders and have focused on the future of the Northern Avenue Bridge since the SLG's creation in 2017.

A Better City led the campaign to create the Greenway Business Improvement District (BID) in 2018, where over sixty properties throughout the corridor voted to contribute \$1.5 million annually for the maintenance and horticulture costs and public realm enhancements along the Greenway. The BID district's boundary abuts the Northern Avenue Bridge on the along Atlantic Avenue side.

In the last two decades, the South Boston Waterfront transformed itself into one of the strongest economic centers in the country through investments in new transportation infrastructure. Unfortunately, this evolution did not include the Northern Avenue Bridge, until the recent attention and leadership provided by Mayor Marty Walsh and his transportation team. It is now possible to realize a new Northern Avenue Bridge that achieves many ambitious goals, fits the needs for this location, and is an appropriate replacement for this historic asset.

We hope as this project moves forward, any additional environmental review will take into account the significant benefits of this project, the long-road in finding a compromise solution and the significant financial commitment promised by the City of Boston.

This Project Addresses Both Transportation and Public Realm Needs

During the 2016 Ideas Competition and through the Mayoral Advisory Task Force, A Better City has advocated for the new Northern Avenue Bridge to include major pedestrian and bicycle improvements. This is necessary to contribute significantly to an ever-expanding network of high quality and safe pedestrian and bicycle infrastructure in the Seaport District. Safe and

convenient pedestrian and bicycle connectivity to the Financial District and beyond is a top priority of A Better City. The recent reconstruction of Seaport Boulevard to include protected cycling infrastructure is an example of how A Better City and the SLG successfully advocated for these this infrastructure with our City and State agencies.

Our interest in supporting high quality and safe pedestrian and bicycle infrastructure as part of the Northern Avenue Bridge project is complemented by our desire to also maintain options for vehicular uses on a portion of the reconstructed bridge in order to serve the most diverse array of neighborhood stakeholders possible, from emergency response needs to high-occupancy transit vehicles to the potential for a future relief value in the event of construction on the Moakley Bridge and many others.

We have consistently approached this issue in the spirit of achieving a balanced, multi-modal transportation solution that maximizes the range of neighborhood stakeholders who benefit from this extraordinary project.

This Reestablishes a Historic and Iconic Link Between the Seaport and Downtown

There is broad consensus on the importance and future potential of the reconstructed Northern Avenue Bridge to the South Boston Waterfront and Seaport District.

The bridge, built in 1908, was a key multimodal link; carrying horse-drawn and motorized vehicles, rail, and pedestrians between the downtown and the burgeoning maritime and industrial activities in South Boston. Prior to the construction of Seaport Boulevard and the Moakley Bridge, more than 18,000 vehicles per day used the Northern Avenue connection to Atlantic Avenue.

Today, the Northern Avenue connection is as important as ever. Since the bridge was closed to vehicular traffic in the late 1990s, more than 10 million square feet of commercial space and more than 4,500 residences have been developed in the South Boston Waterfront. Employees and residents of the Seaport, Fort Point and South Boston neighborhoods will take full advantage of the mobility afforded by a new bridge to connect to downtown destinations and activity centers, the Boston Harborwalk, and important regional transit hubs.

Key Studies Show Bridge Should Support Multiple Modes

- **South Boston Waterfront Sustainable Transportation Plan.** A comprehensive study of existing and future transportation conditions in the South Boston Waterfront was completed by the City, and its sister state agencies, in 2015 . That study, the South Boston Waterfront Sustainable Transportation Plan (SBWSTP), recommended the replacement or rehabilitation of the Old Northern Avenue Bridge to accommodate pedestrians, bicyclists, and peak directional vehicular traffic in recognition of the capacity constraints crossing the Fort Point Channel linking the fast-growing South Boston Waterfront to the established urban core of downtown Boston. The SBWSTP demonstrated that reopening the Northern Avenue Bridge to vehicular traffic would measurably reduce traffic demands at the Seaport Boulevard/Atlantic Avenue intersection and would reduce conflicts for all users (pedestrians, bicyclists and vehicles) at the Sleeper/Seaport Boulevard intersection.
- **Northern Avenue Task Force Mobility Study.** The consultant working on behalf of the City on the redesign of the bridge confirmed the findings of the SBWSTP in their presentation to the Mayoral Advisory Task Force (Mobility and Traffic Evaluation

Workshop, November 14, 2018). Their evaluation forecasted that reopening of the Northern Avenue Bridge to vehicular traffic in the HOV concept would reduce the average delay per vehicle by 2 minutes at the Seaport Boulevard/Atlantic Avenue intersection during the critical evening peak period with less travel time savings for general traffic due to longer queues. Furthermore, reopening the Northern Avenue Bridge was estimated to reduce the volume to capacity ratios at the overtaxed Seaport Boulevard/Atlantic Avenue intersection by 25 to 35 percent, depending on time of day.

This Project Enhances Public Safety, Resiliency, and Flexibility

Accommodating emergency vehicle traffic on the Northern Avenue Bridge will improve emergency access and response times for Boston Police, Fire and EMS access to the John Joseph Moakley United States Courthouse and the many public gathering places in the Seaport and marine industrial areas in South Boston. The bridge should also be designed to support network redundancy and flexibility for vehicular traffic under specific circumstances. This will be important in the event that other Channel Crossings are under construction or constrained, special events and/or real-time traffic congestion warrants its use. This will allow the bridge to strengthen its potential utility to as many diverse stakeholders as possible.

This connection should also serve to provide a more resilient transportation network through its design to meet the more rigorous requirements of the Mayor's *Resilient Boston Harbor* and *Climate Ready Boston* initiatives.

This Project Provides for Future Transit Connectivity

Finally, as the City and State consider dedicated transit corridors over the longer-term, transit access in an HOV lane on the bridge holds open great potential to improve connectivity between the Waterfront and the Blue and Orange Lines, and especially North Station. For example, dedicating a westbound lane on the Northern Avenue Bridge would afford MBTA and various commuter shuttles the opportunity to bypass the forecasted 11-minute delay to vehicles leaving the Seaport via Seaport Boulevard in the evening. Analysis shows that the HOV concept has the potential to move the most people across the bridge in that a dedicated transit lane can process 4 to 5 times more people per hour than a general traffic lane. The use of an HOV lane westbound on the Northern Avenue also provides measurable travel time savings between the Seaport and North Station, a critically important regional transit connection. For both sustainability and quality of life issues, we believe the bridge's link to improved transit routes in the downtown is a worthwhile option to include in the design plans.

Benefits Accrued to All Traveling Public

Through this multimodal transportation investment that prioritizes pedestrian, bicycle, and vehicular modes in a balanced manner, a wide range of public and private stakeholders will benefit from:

- An enhanced, more direct and protected pedestrian connection from the South Boston Waterfront to the Greenway, Boston Harborwalk and the downtown proper;
- A protected and well-designed dedicated bicycle connection over the Fort Point Channel;
- Improved access for emergency vehicles and improved mobility for transit vehicles;
- Enhanced mobility for certain types of vehicles, specifically focused on providing network flexibility and redundancy to reduce district congestion and improve district air quality

- Improved connections to the harbor for residents and visitors; and,
- An iconic bridge that will serve as a landmark and a destination, in and of itself, for future generations.

Mayor Walsh set ambitious goals for the replacement of the Northern Avenue Bridge: *Improve Mobility; Honor History, Strengthen Resiliency, and Create a Destination.*

After two years of work from the Mayor's task force that included 12 official meetings, 26 stakeholder briefings, and 2 community meetings, the 15 members who participated in this process produced this current bridge design and grand vision that continues to carry broad support. I served as the chair of this task force and I am proud of the group's contributions to maximize the benefits of this project. This work was not easy, as many task force members and community voices represented interests that are frequently often at odds with each other over transportation and mobility issues. In the end, we came together to get it right.

Finally, it is remarkable that Mayor Walsh is committing \$100 Million of city funds to advance this project towards completion. This financial support, in addition to the attention and partnership shows how important the Northern Avenue Bridge is to this area. It should also speak to the strength of this proposed design.

Considering these goals, the collaborative process completed over the last two years, and the vision for a truly special destination bridge, we believe the City of Boston should be allowed to move forward with this project without additional reviews or delay.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Dimino". The signature is fluid and cursive, with the first name "Richard" and last name "Dimino" clearly distinguishable.

Richard A. Dimino
President and CEO



Are you on board?

15 State Street, Suite 1100
Boston, MA 02109
617.223.8671
bostonharbornow.org

June 9, 2020

Via email: alexander.stryisky@mass.gov

Kathleen A. Theoharides, Secretary of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Attn: Alex Stryisky, MEPA Unit

Chris Osgood, Chief of Streets
Public Works Department
Boston City Hall
Boston, MA 02201
Attn: Para Jayasinghe, City Engineer

Re: MEPA Project 16194, Northern Avenue Bridge Replacement, Boston

Dear Mr. Stryisky,

Thank you for the opportunity to comment on the design of the Northern Avenue Bridge Replacement Project as part of the ENF review process. Members of the Boston Harbor Now team have served on the Mayoral Advisory Task Force in 2018 and 2019, attended the online community meeting on May 6, 2020, and participated in the virtual MEPA site visit on May 20, 2020.

The future Northern Avenue Bridge can serve as a critical connection and visual gateway between downtown Boston and the Fort Point Channel. It also has the potential to close some major gaps in the Harborwalk in the very heart of our city, opening up new vistas to the Harbor while offering new ways to access exciting new public amenities along Fort Point Channel and in the Seaport. Toward those ends, the design of the bridge has evolved considerably over the past several years and has many features that we admire. Unfortunately, we believe there is still more work to be done. We are concerned that too many aspects of the design remain vague or purely conceptual, raising questions about the appropriateness of a MEPA review at this point in time.

Missing Coordination with the BPDA

The bridge design does not appear to be coordinated with the Boston Planning and Development Agency (BPDA) around concurrent planning efforts. On the western end of the bridge, the Downtown Municipal Harbor Plan (MHP) proposes a significant development at the Hook Lobster site that has virtually no roadway access to construct it or to deliver supplies to it as the bridge is currently designed. Additionally, there is no clear way to connect with any future waterfront public spaces built on the site.

Harborwalk Connections

It was not until the final stages of the design process that the conversation moved from the central span of the bridge to its connections with land on either side. As an organization that plays a significant stewardship role in the Harborwalk, we were pleased to see fully accessible connections to the elevated bridge deck incorporated on the north and south sides of the bridge on the eastern side of the channel as well as on the north side of the bridge on the western side of the channel.

However, these connections are conceived as narrow switchbacks that may be difficult for people with limited mobility, bicycles, and baby carriages to navigate, especially during rush hour when pedestrians and cyclists crossing to and from the Seaport will be joined by surges of passengers disembarking from ferries at Rowes Wharf. Further consideration should be given to the design of these important connections. Furthermore, the design does not appear to anticipate needed changes to the elevation of the Harborwalk as the level of the sea increases in future decades. How will such connections be accommodated? Finally, the design appears to pose a significant impact on the existing Barking Crab restaurant by blocking a sizable section of the façade; the City should coordinate with the business to develop a mutually acceptable solution—recognizing that some elevation in this area will be required over time.

Transportation - Mode Choice and Traffic Flow

While Boston Harbor Now strongly supports mass transit, there is not a clear need for the proposed bus lane on this bridge. Even the City's own transit and congestion studies suggest that Congress Street is the more efficient choice for a new bus lane into the Seaport, particularly for connections with North Station. Creating an express lane over the bridge from Northern Avenue to exit the Seaport that can only turn right onto Atlantic Avenue, where traffic is regularly congested, does not provide transit riders with a better option. Here the bus turning right at an unsignalized intersection must navigate across a busy sidewalk as well as pedestrian flows from the bridge while crossing any vehicles turning right to access the parking lot and loading bay for the Coast Guard building. Furthermore, the creation of the Lovejoy/North Station to Fan Pier/Seaport water transportation service has already reduced the demand for private shuttle buses.

The proposed bus lane also poses safety concerns for vulnerable road users. The way that the bridge narrows on the ends and blends transit vehicles with people walking and biking creates an unsafe level of complexity. The design will likely create an ambiguous pedestrian zone

intersecting bus lanes at an angle with little room for any kind of system that could segregate the two modes safely.

With the above in mind, we cannot support the use of this bridge for shuttle buses. It should be designed solely for pedestrian and bicycle users, with sufficient space to support emergency vehicles when needed.

Proposed Island

While the proposed bridge deck has been elevated to ensure that it will not be impacted by extreme storms with projected sea level rise through 2100, there are other aspects of the design, including the proposed island, that do not appear to meet this threshold.

We are enthusiastic whenever new park space is proposed on the waterfront and the creation of an artificial island “promenade” surrounding the existing center swing pier and the historic rotating mechanisms is an exciting design concept. However, the current design does not address vulnerability to flooding. The island is not elevated above projected sea level rise nor is it clear how the island itself is being designed to keep out or absorb high tides or storm surge in the future. Additionally, it lacks details in lighting and other features that would ensure that it feels welcoming and safe at all hours and in all seasons.

The idea of focusing on the bridge and the island as a destination originated before much of the Seaport was built. Though the views from the deck of the bridge will likely attract visitors, much of the views from the lower promenade will focus on the underside of the Moakley Bridge or have sightlines to the Harbor that will not be nearly as good as those from the bridge deck. With a clear demand for building new multi-benefit parks and public spaces along the waterfront that can protect residents, businesses, and infrastructure, this park feature noticeably does not serve that function.

In conclusion, the current design of the Northern Avenue Bridge is exciting, but it fails to maximize a safe and effective pedestrian and bike experience across the Fort Point Channel or safe and useful accessible connections with the Harborwalk and adjacent business on either end of the bridge. The lack of detail for later phases of the design give us pause. The Secretary should insist that the entire project be evaluated and later permitted together, and a condition of the Secretary’s certificate should be a commitment to the construction of the entire project.

We appreciate the opportunity to comment and ask that our concerns be addressed in the Secretary’s scope for a Draft Environmental Impact Report for this project. We would be happy to speak further with the MEPA Office if there are additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott", with a stylized, flowing script.

Kathy Abbott
President and CEO

BOSTON PRESERVATION ALLIANCE

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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
617.367.2458

June 9, 2020

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.

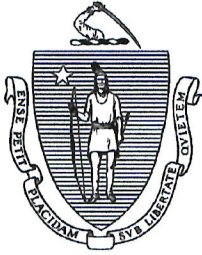
Sincerely,



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



The COMMONWEALTH OF MASSACHUSETTS
BOARD OF UNDERWATER ARCHAEOLOGICAL RESOURCES
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
251 Causeway Street, Suite 800, Boston, MA 02114-2136

Tel. (617) 626-1014 Fax (617) 626-1240

www.mass.gov/orgs/board-of-underwater-archaeological-resources

June 9, 2020

Kathleen A. Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
Attention: Alex Strysky, MEPA Unit
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Northern Avenue Bridge Replacement Project (EOEA #16194), Boston, MA

Dear Secretary Theoharides,

The staff of the Massachusetts Board of Underwater Archaeological Resources has reviewed the above-referenced proposed project as detailed in the *Environmental Monitor* of 6 May 2020 and offers the following comments.

The Board has conducted a preliminary review of its files, the MHC's MACRIS archaeological site inventory geospatial database, the NOAA Office of Coast Survey's Wreck and Obstructions Database, historical charts and maps, aerial imagery, and secondary literature sources to identify known and potential submerged cultural resources in the underwater portion of the proposed project area. No record of any underwater archaeological resources was found. However, previously conducted studies suggest the possibility of cultural material along the edges of the channel that could have been exposed through vessel traffic and past construction activities. Additionally, the historical record indicates the occurrence of numerous shipwrecks in the Boston Harbor vicinity for which locations are vague. Furthermore, the loss of earlier and smaller coastal vessels and the purposeful abandonment of obsolete or damaged vessels are generally not found in the documentary record. For this reason, and in recognition of the significance of Boston Harbor as a center of maritime commerce and historic shipping, the Board considers the entire harbor to exhibit high probability for containing historic submerged archaeological resources.

For areas exhibiting such high archaeological potential, the Board typically recommends an archaeological assessment of the intertidal and submerged portions of the project area. However, the nature and extent of bottom disturbance described in the proposed project's ENF will be confined to the footprint of the existing bridge's alignment, and within or immediately adjacent to the footprints of existing bridge piers. Consequently, the Board finds that the proposed activity will be unlikely to adversely affect submerged cultural resources and does not recommend an archaeological survey of the proposed project area.

In the event that heretofore-unknown submerged cultural resources are encountered during the course of the project, the Board expects that the project's sponsor will take steps to limit adverse effects and notify the Board and the Massachusetts Historical Commission, as well as other appropriate agencies, immediately, in accordance with the Board's *Policy Guidance for the Discovery of Unanticipated Archaeological Resources*.

The Board appreciates the opportunity to provide these comments as part of the MEPA review process. Should you have any questions regarding this letter, please do not hesitate to contact me at (617) 626-1014, or by email at david.s.robinson@mass.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "David S. Robinson", written over a circular blue stamp.

David S. Robinson
Director

/dsr

Cc: Brona Simon, MHC
Robert Boeri and Erikk Hokenson, MCZM (via electronic attachment)

**Boston Water and
Sewer Commission**



980 Harrison Avenue
Boston, MA 02119-2540
617-989-7000

May 20, 2020

Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Alex Strycky, EEA No. 16194
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Northern Avenue Bridge Replacement, Boston
Environmental Notification Form

Dear Secretary Theoharides:

The Boston Water and Sewer Commission (Commission) has reviewed the Environmental Notification Form (ENF) for the proposed Northern Avenue Bridge Replacement project in Boston.

The proposed project is located on an approximately 2.0 acre site on Northern Avenue over Fort Point Channel in Boston that connects Downtown to the South Boston Seaport District. The site currently contains the existing Northern Avenue Bridge, constructed from 1905 to 1908. The bridge was closed to vehicular traffic in 1997 and pedestrian traffic in 2014. The proponent, City of Boston Public Works Department (BPWD), proposes to replace the existing Northern Avenue Bridge with a new pedestrian and bicycle bridge that would allow potential bus and emergency vehicle traffic. The project features a promenade located where the old bridge swung open, which will be utilized to enhance public access to and enjoyment of the waterfront.

The Commission met and discussed with BPWD:

1. Having pressurized water and pressurized sewer lines run through the bridge,
2. The potential to allow for the construction of a dam structure to be incorporated into the foundation of the proposed bridge. The potential dam would allow for stormwater control within the Fort Point Channel.

According to the ENF, there is no proposed water demand associated with the project. The Commission owns and maintains an 8-inch Southern Low PCI water main installed in 1910 on the western approach to the bridge, and a 12-inch Southern Low DICL water main installed in 2003 and an 8-inch Southern Low DICL water main installed in 1997 on the eastern approach to the bridge.



According to the ENF, there is no proposed sewage generation associated with the project. For sewage and storm drainage service, the bridge is served by a 12-inch sanitary sewer on the western approach to the bridge.

The Commission has the following comments regarding the ENF:

General

1. Prior to the initial phase of the site plan development, BPWD should meet with the Commission's Design and Engineering Customer Services to review water main, sewer and storm drainage system availability and potential upgrades that could impact the development.
2. All new or relocated water mains, sewers and storm drains must be designed and constructed at BPWD's expense. They must be designed and constructed in conformance with the Commission's design standards, Water Distribution System and Sewer Use regulations, and Requirements for Site Plans. The site plan should include the locations of new, relocated and existing water mains, sewers and drains which serve the site, proposed service connections, water meter locations, as well as back flow prevention devices in the facilities that will require inspection. A General Service Application must also be submitted to the Commission with the site plan.
3. The Commission will require BPWD to undertake all necessary precautions to prevent damage or disruption of the existing active water and sewer lines on, or adjacent to, the project site during construction.

Water

1. BPWD must provide separate estimates of peak and continuous maximum water demand for residential, commercial, industrial, irrigation of landscaped areas, and air-conditioning make-up water for the project with the site plan. Estimates should be based on full-site build-out of the proposed project. BPWD should also provide the methodology used to estimate water demand for the proposed project.
2. BPWD is required to obtain a Hydrant Permit for use of any hydrant during the construction phase of this project. The water used from the hydrant must be metered. BPWD should contact the Commission's Meter Department for information on and to obtain a Hydrant Permit.

Sewage / Drainage

1. In conjunction with the Site Plan and the General Service Application BPWD will be required to submit a Stormwater Pollution Prevention Plan. The plan must:



- Identify specific best management measures for controlling erosion and preventing the discharge of sediment, contaminated stormwater or construction debris to the Commission's drainage system when construction is underway.
 - Include a site map which shows, at a minimum, existing drainage patterns and areas used for storage or treatment of contaminated soils, groundwater or stormwater, and the location of major control structures or treatment structures to be utilized during the construction.
 - Specifically identify how the project will comply with the Department of Environmental Protection's Performance Standards for Stormwater Management both during construction and after construction is complete.
2. Developers of projects involving disturbances of land of one acre or more will be required to obtain an NPDES General Permit for Construction from the Environmental Protection Agency and the Massachusetts Department of Environmental Protection. BPWD is responsible for determining if such a permit is required and for obtaining the permit. If such a permit is required, it is required that a copy of the permit and any pollution prevention plan prepared pursuant to the permit be provided to the Commission's Engineering Services Department, prior to the commencement of construction. The pollution prevention plan submitted pursuant to a NPDES Permit may be submitted in place of the pollution prevention plan required by the Commission provided the Plan addresses the same components identified in item 1 above.
 3. The Commission encourages BPWD to explore additional opportunities for protecting stormwater quality on site by minimizing sanding and the use of deicing chemicals, pesticides, and fertilizers.
 4. The discharge of dewatering drainage to a sanitary sewer is prohibited by the Commission. BPWD is advised that the discharge of any dewatering drainage to the storm drainage system requires a Drainage Discharge Permit from the Commission. If the dewatering drainage is contaminated with petroleum products, BPWD will be required to obtain a Remediation General Permit from the Environmental Protection Agency (EPA) for the discharge.
 5. The Commission requests that BPWD install a permanent casting stating "Don't Dump: Drains to Boston Harbor" next to any catch basin created or modified as part of this project. BPWD should contact the Commission's Operations Division for information regarding the purchase of the castings.



Thank you for the opportunity to comment on this project.

Yours truly,

John P. Sullivan, P.E.
Chief Engineer

JPS/afh

cc: Para Jayasinghe, BPWD
K. Ronan, MWRA via e-mail
M. Zlody, BED via e-mail
P. Larocque, BWSC via e-mail

June 9, 2020

Via email: alexander.stryisky@mass.gov

The Honorable Kathleen A. Theoharides
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Attn: MEPA Office, Alex Stryisky Boston, MA 02114

Subject: MEPA File No. 16195—ENF for Northern Avenue Bridge Replacement Project

Dear Secretary Theoharides:

Conservation Law Foundation (“CLF”) submits the following comments on the City of Boston’s (“City”) Environmental Notification Form (“ENF”) for the proposed Northern Avenue Bridge Replacement Project located on the Fort Point Channel. The Boston waterfront is one of the City’s defining features and most critical assets. The proposed Northern Avenue Bridge location at the mouth of the Fort Point Channel presents an unparalleled opportunity to expand access to a unique and desirable view of the Boston Harbor, and create a pedestrian and bicycle connection between the Downtown and South Boston Waterfront components of the Boston Harborwalk. CLF strongly supports expanded access to the Harbor and increased active transportation connections. Notwithstanding, we are concerned that other planned aspects of the bridge replacement are destructive of the values of a clean, accessible, and climate-resilient waterfront, as well as the City’s and the Commonwealth’s climate mitigation goals. Our comments below focus on the transportation, climate resilience, and public space aspects of the proposed project.

I. Transportation Concerns

a. The Bridge Should be Restricted to Bicycle and Pedestrian Use.

The new bridge should be constructed solely for bicycle and pedestrian use and prevent automobile access. A vehicle lane and associated structural support reserved for private vehicles is unnecessary, costly, and a source of air pollution. The ENF states that the purpose of this project is to re-establish, for public enjoyment, the connection of the Downtown and South

Boston Waterfront neighborhoods.¹ We support this goal. The current proposal would allow bicycle, pedestrian, and bus use. While CLF supports bicycle and pedestrian use, we do not support the use of this bridge for any automotive vehicles at any time upon construction completion or far into the future. By designing a bridge capable of accommodating automotive vehicles, the project leaves the door open for future private vehicular traffic, including private shuttles and passenger vehicles, even if such a use is not the City's near-term goal.

Following its closure to vehicular traffic, the Northern Avenue Bridge served as a pedestrian and cycle bridge from 1997 until its closure in 2014.² There is no compelling reason to change that designation and purpose with a replacement bridge. By dedicating the bridge to exclusive bicycle and pedestrian use, the City will encourage travel by bike and foot consistent with the goals of Go Boston 2030 and Carbon Free Boston while contributing to the Commonwealth's greenhouse gas emission reduction targets.³ In addition, a pedestrian and cycle replacement bridge would eliminate unnecessary air pollution for people enjoying the waterfront. Goals for pedestrian and cycle access should include ensuring an optimal connection to the Boston Harborwalk, minimizing the slope at either end of the bridge to optimize pedestrian and cyclist experience, and maximizing access to the Fort Point Channel.

Although CLF is a vocal proponent of public transportation and dedicated bus lanes, the City has not demonstrated that the replacement bridge would provide an ideal or even appropriate location for a bus lane. The City has not demonstrated that it has communicated with the MBTA to confirm that buses could or would be re-routed over the replacement bridge. For example, MBTA bus routes 4 and 7 currently travel across the Fort Point Channel to the Seaport in the vicinity of the bridge but there is no demonstration that these routes would shift to Northern Avenue. The MBTA's study of improvements to its bus networks and routes does not contemplate the use of Northern Avenue for a bus lane. The MBTA is the decision maker regarding bus route changes and there is no evidence in the ENF that bus service would be rerouted, or that rerouting service would reduce traffic congestion in downtown Boston. CLF supports studying whether implementation of one or more bus-only lanes on Congress Street, Summer Street, and/or Seaport Boulevard would be a better option compared to a bus-only lane on the Northern Avenue Bridge. Providing increased, more reliable bus access through these existing routes would allow for the construction of Northern Avenue Bridge as a bicycle and pedestrian only bridge—improving public access, decreasing emissions on the bridge, and lowering the cost of the project.

CLF also opposes the use of the replacement bridge for all other automotive vehicles including private shuttles buses. Private shuttles do not improve public access throughout Boston and serve only to increase traffic and pollution. Because there is no evidence that MBTA buses would be

¹ Northern Avenue Bridge Environmental Notification Form, page 3, May 20, 2020, <https://eeaonline.eea.state.ma.us/EEA/emepa/mepadocs/2020/052020em/opur/enf/ENF%20Northern%20Avenue%20Bridge%20Replacement%20Project%20BOSTON.pdf>.

² *Id.*

³ Chapter 298 of the Acts of 2008 (“An Act Establishing the Global Warming Solutions Act”).

rerouted to use this dedicated bus lane, we can only assume that the current design would allow exclusive use of the lane by private shuttle buses serving employees in the Seaport District. Private traffic on this bridge would increase congestion, pollution, and limit both cyclist and pedestrian enjoyment of the project.

b. Funding Should Prioritize Public Use, and Funding Details Should be Made Transparent.

The project should prioritize pedestrian, bicycle, and public space features over more costly vehicular travel lanes, especially considering apparent funding shortfalls for project completion as currently contemplated. Appendix C provides a funding summary of the current total allocated funding for the project, estimated at \$58 million. However, the ENF states that the preliminary cost estimate for restoring the bridge to *usable condition* is approximately \$83.5 million. This estimate does not appear to include construction of other features, such as the promenade, that have been touted as important components of the project. The full cost of the project appears to be closer to \$150 million.

Further, the current “allocated funding” as described in Appendix C includes \$15 million from the City’s Parking Meter Fund, which is a significant amount.⁴ The Parking Meter Fund is a source of funding for other critical transportation projects across the city, including accessible sidewalks, protected bike lanes, electric vehicle charging stations, and other green infrastructure more aligned with the magnitude of funding available⁵. CLF questions what percent of the total parking meter fund would be spent on the replacement bridge and whether it is appropriate to divert the \$15 million for such purposes. The City has also provided little detail about the proposed contribution of WS Seaport to the project budget. CLF requests clarification as to whether this contribution is dependent on a specific project design or an existing mitigation requirement.

Given the limited funding identified for this project, we are concerned that the City did not fulfill its alternatives analysis requirement by failing to analyze or provide a cost estimate for a simpler bicycle/pedestrian only bridge design. We expect that this redesign would yield a considerably lower cost for the project, while maintaining or expanding the benefits provided by the bridge. We also request clarity on the deadline for expending federal funds included in the project budget and on how proposed phasing of the project will be impacted by the current budget shortfall. Namely, CLF requests information regarding whether any elements of the current design, such as the promenade, will be cut or postponed due to budget constraints, and how those budget constraints will affect the project timeline.

⁴ The Parking Meter Fund typically generates approximately \$25 million per year. This proposal would allocate 60 percent of those funds for a single project. See City of Boston Fiscal Year 2020 revenue estimates and analysis, page 73, https://www.boston.gov/sites/default/files/embed/file/2019-09/3-volume_1_-_revenue_estimates_and_analysis.pdf.

⁵ <https://www.boston.gov/news/updates-coming-parking-meter-rates-starting-monday-july-1>.

c. Entry and Exit Points Should Maximize Mobility.

Further analysis of the bridge's connections to existing transportation infrastructure is necessary to ensure that the new bridge does not exacerbate existing congestion. From an urban planning perspective, the location of Northern Avenue Bridge has long been viewed as the gateway to the Seaport, connecting the Greenway, Financial District, and Downtown areas with the Fort Point and South Boston Waterfront neighborhoods. It is a critical pedestrian link between two high-traffic areas of the Harborwalk. It connects businesses on either side of the bridge and significantly increases activation of surrounding areas. To ensure this project will improve transportation options across the Fort Point Channel, the City needs to better describe how entrance and exit points will connect with existing bike lanes, sidewalks, and roads and how such connections will alleviate or exacerbate traffic queuing, idling, or safety concerns. Further, we request that the City provide an analysis of these entrance and exit connections to ensure that the chosen connection strategies will both maximize the safety of cyclists and pedestrians and mitigate traffic congestion.

II. Climate Resilience for the Full Lifespan of the Project

CLF is pleased that climate resilience is front of mind for this project. Every infrastructure project in the City of Boston should be designed to withstand climate impacts during the useful life of the project. However, the ENF includes surprisingly little discussion of climate risks and resilience. It simply states that the current bridge is frequently submerged in water during storm events and that the proposed replacement project would raise the bridge to “match the current navigable clearance of the adjacent Seaport Boulevard bridge of 16 feet above Mean High Water.” The ENF does not discuss, in detail, the current elevation of the bridge and how the proposed elevation compares to Climate Ready Boston estimates for future flood risk. It is also unclear whether the City has analyzed climate impacts beyond sea level rise, for example, the combined impacts of sea level rise, storm surge, and more extreme precipitation.

Further, the ENF contemplates a 75-year design life for this bridge, but the likely useful life of this bridge could extend well beyond then. The previous iteration of this bridge was in full use for a minimum of 89 years according to the ENF. Considering the general lifespan of bridges, CLF encourages the City to perform a more complete and longer-term analysis of climate risks and alter the design plan accordingly. Specifically, the City should consider the effects of sea level rise and other climate risks beyond the current 75-year window, and take appropriate steps to either address these concerns in this replacement project or describe how adaptive capacity will be preserved in the design so that the bridge can respond to increased risks in the future.

The ENF also does not describe any planned resiliency measures for the promenade, which is proposed at an undisclosed elevation below the bridge. Presumably, the promenade will be subject to climate risks including sea level rise, storm surge, and extreme precipitation, and is likely to suffer frequent flooding. Based on the renderings, which depict the promenade as being almost entirely impervious surface, it may also have the potential to exacerbate stormwater

runoff. In general, the ENF suggests that the City has not fully contemplated how the replacement bridge design will protect the promenade from climate risks nor does it contemplate any alternative designs that could actively leverage the promenade for resilience purposes.

The ENF also does not discuss how this project relates to the various planned or ongoing climate resilience projects being undertaken by the City at the direction of the Boston Planning and Development Agency (“BPDA”), the Boston Environment Department, or the Boston Water and Sewer Commission (“BWSC”). The ENF simply mentions that the area is covered by two Municipal Harbor Plans. It fails to mention that this location is included in the Climate Ready Boston Downtown and North End neighborhood plan as well as an ongoing pinch point for BWSC. The City should be transparent about how projects are being coordinated and how information is being shared between departments.

III. Public Space as the Centerpiece of the Replacement Bridge

CLF is a strong supporter of waterfront public space and placemaking. However, our concerns with the proposed promenade are twofold. First, while we were excited to see the public promenade featured as a centerpiece of the replacement project, it is unclear whether this is the ideal location for placemaking. There are other waterfront areas that are in need of significant investment in public space. Funding may be better spent focusing on these landside opportunities. Second, the proposed promenade requires more thought and innovative design if it is going to be a world-class destination. The current design seems to be an afterthought rather than a centerpiece of the project, and it does not appear to address climate risks at all.

We are also concerned that under the current proposal the promenade will be constructed on a lower elevation than the proposed travel lanes. Several stakeholders have raised the potential impacts of motor vehicle pollution on people enjoying the promenade. CLF is concerned that bus and shuttle exhaust fumes would negatively impact the health of bridge and promenade users. Therefore, CLF reiterates its request to limit replacement bridge access to pedestrians and cyclists and exclude motor vehicle traffic.

Finally, page four of the ENF states that the public promenade will be built in three phases, and although it states that phase one will be built at the same time as the rest of the project, it does not specify when phases two or three will be built, or whether the promenade will be ready for public use after phase one. We request further information describing what each phase of the promenade’s construction will involve, when each phase will be built, and why two-thirds of the promenade cannot be built during construction of the rest of the project. If creating a destination on the bridge is indeed a guiding principle of this project, as the City has stated, then the promenade should be built in tandem with the bridge, not at a later unspecified date.

IV. Next Steps and Environmental Impact Report

Given the scope and likely environmental impacts of the project, CLF requests affirmation that the City will be required to prepare an Environmental Impact Report (EIR) to address the impacts of the project, as is required by 301 CMR 11.00. As the City identifies in the ENF cover letter, as well as in Appendix D: Permits, the project meets MEPA thresholds in three areas: Wetlands, Waterways, Tidelands in §11:03(3); Transportation in §11:03(6); and Historical and Archeological Resources in §11:03(10). The likely environmental impacts of the project will be substantial, especially considering the cumulative impacts in all of the above-lists areas over the long term, so an EIR should be required. Even if the project does not meet mandatory EIR thresholds in any of the individual areas, the project meets *at least* the permissive threshold in all three areas, thus you should exercise your discretion to require the City to go through the EIR process to improve the project.

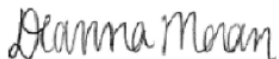
Northern Avenue Bridge is a once-in-a-generation opportunity to expand bicycle and pedestrian access to the Boston waterfront and facilitate a critical connection between the Downtown, Fort Point Channel, and South Boston Waterfront neighborhoods. We encourage you to evaluate the ENF with those goals in mind and encourage the City of Boston to address the numerous concerns raised here in an Environmental Impact Report.

Thank you for your consideration of these comments. Please direct your questions to Staci Rubin at srubin@clf.org or Deanna Moran at dmoran@clf.org.

Sincerely,



Staci Rubin
Senior Attorney



Deanna Moran
Director, Environmental Planning

From: [Chris Dippel](#)
To: [Strysky, Alexander \(EEA\)](#)
Cc: comments@walkboston.org
Subject: Comments on the Northern Avenue Bridge Project
Date: Saturday, May 30, 2020 1:12:56 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Strysky:

I wish express my support of the criticism of the current bridge design provided to MEPA by WalkBoston, Boston Cyclists Union, and Livable Streets and further note:

- the bridge should only be used by cyclists, pedestrians, and emergency vehicles and not vehicles, the use of which would create unsafe conditions for other users, detract from the "destination" quality of the bridge, and subvert the need for developing more appropriate transportation to the Seaport district;
- there is no clear interconnection between the bridge and the existing and planned channel-side walkways; and
- the center plaza portion of the bridge does not allow for pleasurable sunlight or views for users and should be located outside of or above the travel portion.


Thank you for your consideration.

Best regards, Chris Dippel
Chestnut Hill, MA



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
OFFICE OF COASTAL ZONE MANAGEMENT
251 Causeway Street, Suite 800, Boston, MA 02114-2136
(617) 626-1200 FAX: (617) 626-1240

MEMORANDUM

TO: Kathleen A. Theoharides, Secretary, EEA
ATTN: Alex Strysky, MEPA Office
FROM: Lisa Berry Engler, Director, CZM 
DATE: June 5, 2020
RE: EEA #16194, Northern Avenue Bridge Replacement Project, Boston

The Massachusetts Office of Coastal Zone Management (CZM) has completed its review of the above-referenced Environmental Notification Form (ENF) noticed in the *Environmental Monitor* dated May 6, 2020 and offers the following comments.

Project Description

With this ENF, the City of Boston's Public Works Department (BPWD) and the "Proponent" proposes to replace the existing Northern Avenue Bridge over the Fort Point Channel with a stationary pedestrian and bicycle bridge that may also accommodate transit and emergency vehicles. The existing steel-truss pivot swing bridge, which rests on granite block piers and concrete-foundation- and friction-pile-supported abutments, was closed to vehicular traffic in 1997 and closed to pedestrian traffic in 2014. The existing superstructure is proposed to be dismantled in place, transported to and de-leaded at Dry Dock 4 in the Raymond L. Flynn Marine Park in the South Boston Designated Port Area, and decoratively reincorporated into the proposed bridge. The bridge tender's house is, along with the existing bridge, listed in the State Register of Historic Places (SRHP) and will be removed during the dismantling of the existing bridge. The proposed replacement bridge will be a 690-foot fixed span in the same alignment as the existing bridge that will utilize new piers adjacent to or within the footprint of existing piers. Because the proposed bridge will not open for vessels on the Fort Point Channel, it will match the 75-foot-wide clearance of the existing Northern Avenue Bridge and the vertical clearance of the Evelyn Moakley Bridge to the south. A publicly accessible "Promenade" will also be built in the footprints of the existing fender pile field and the bridge tender's house; the Promenade will be 432 feet long and 80 feet wide after the three phases of proposed construction are completed. The project will disturb asbestos containing material; dredge approximately 2,407 cubic yards (CY) to install the new piers and piles; temporarily impact 40,459 square feet (SF) and permanently impact 2,488 SF of land under ocean and land containing shellfish; temporarily impact 170 linear feet of coastal bank; and permanently impact 2,590 SF of land subject to coastal storm flowage. As some of the existing piles and piers will be removed, approximately 3,913 SF of land under ocean will no longer be occupied by structures, which will result in a net increase of 1,425 SF of land under ocean. The northwestern landing of the bridge north of Hook Wharf is within the planning area for the Downtown Waterfront District Municipal Harbor Plan (MHP); the southerly edge of the existing Northern Avenue Bridge forms the boundary of the planning area for the Fort Point Downtown MHP; and the southeastern landing of the proposed bridge in South Boston is within the planning area for the South Boston Waterfront District MHP.



Project Comments

Construction Impacts

Fort Point Channel is an area that supports the spawning and juvenile development of winter flounder (*Pseudopleuronectes americanus*). Any incursion into the time-of-year restriction window, which is typically February 15 through June 30 for winter flounder, will require a waiver from the Massachusetts Division of Marine Fisheries (DMF). CZM recommends the proponent consider concurrent phases of in-water work and the deployment of silt/turbidity curtains to minimize and control turbidity. Turbidity and noise during demolition and construction should be monitored to ensure that recommended thresholds are not exceeded. As much work as possible should be conducted from the upland with appropriate erosion and silt control best management practices (BMPs) and any barges or floats should be prevented from grounding at all times.

Consistency with Municipal Harbor Plans

Though none of the existing nor proposed bridge structures over the Fort Point Channel are within the boundaries of any municipal harbor plans, the Northern Avenue Bridge is referenced in all three of the above-listed MHPs and the Fort Point Channel Watersheet Activation Plan. The proposed replacement of the bridge provides an opportunity not only to improve pedestrian and bicycle connections between the Downtown and South Boston Waterfront Districts, but also to promote opportunities to interact with the Fort Point Channel itself. The Fort Point Channel Watersheet Activation Plan outlines a vision for the “Hub of the Channel” between the Northern Avenue and Summer Street Bridges that supports “an intensive program of water-based activities including cultural, education, and artistic uses and performances complemented by landside museums, restaurants, and open spaces.” The ENF indicates that Phases II and III, which include the extension of the Promenade to its maximum proposed extent, are subject to the availability of additional funding. Though not without impacts, the construction of the full Promenade offers a unique opportunity to realize a part of this vision. As the design of the proposed bridge, in particular the Promenade, advances, the proponent should consider how the bridge may enhance the public’s enjoyment of the waterway, including interpretive, historic, and educational signage and programming, intuitive gathering areas for public tours or other gatherings, pedestrian amenities, and, if appropriate, water-related programming. Wayfinding signage and street furniture, such as street lighting, should be consistent with the immediately adjacent areas of the waterfront to promote the public’s experience of the waterfront, especially the Harborwalk. The proposed accessible ramp to the Harborwalk at the northwestern approach of the bridge will close a significant gap in the universal accessibility of the Harborwalk in downtown Boston and CZM encourages the proponent and abutters to collaborate to realize this proposed improvement.

Resilience

The ENF indicates that the replacement bridge is proposed at a higher elevation than the current bridge to accommodate future sea level rise. The plans indicate that the top of the Promenade deck will be two feet above the current 1% flood elevation, but do not indicate the elevation of any structural elements above the deck (e.g., knee walls) – if any are proposed – to protect the Promenade from future flooding given the projected 40-inch increase in sea level by 2070. Similarly, sea level rise will affect the vertical clearance of the federal navigation channel. Prior to permitting, CZM recommends the proponent consider opportunities to maintain the federal navigation channel’s future vertical clearance given the projections for sea level rise and consult with the U.S. Coast Guard to minimize navigational impacts, especially during demolition and construction phases.

Historic Resources

CZM recommends continued consultation with the Massachusetts Historical Commission and Board of Underwater Archaeological Resources to avoid, minimize, and mitigate any adverse impacts to historic resources as the design of the replacement bridges progress and during demolition and construction.

Federal Consistency

The proposed project may be subject to CZM federal consistency review. For further information on this process, please contact Robert Boeri, Project Review Coordinator, at 617-626-1050 or visit the CZM website at www.mass.gov/czm/fcr.

LBE/ts/elh

cc: Rachel Freed, Deputy Regional Director, MassDEP-NERO Bureau of Water Resources
Kate Frew, Environmental Analyst, Massachusetts Division of Marine Fisheries
Para Jayasinghe, City Engineer, City of Boston Public Works Department
Richard McGuinness, Deputy Director for Climate Change and Environmental Planning,
Boston Planning & Development Agency
Daniel Padien, Program Chief, MassDEP Waterways Regulation Program
David S. Robinson, Director, Board of Underwater Archaeological Resources
Brona Simon, State Historic Preservation Officer & Executive Director, Massachusetts
Historical Commission



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Kathleen A. Theoharides
Secretary

Martin Suuberg
Commissioner

June 6, 2020

Kathleen A. Theoharides, Secretary
Executive Office of
Energy & Environmental Affairs
100 Cambridge Street
Boston MA, 02114

RE: Boston
Northern Avenue Bridge Replacement
EEA # 16194
Environmental Notification Form

Attn: MEPA Unit – Alex Strysky

Dear Secretary Theoharides:

The Massachusetts Department of Environmental Protection has reviewed the Environmental Notification Form (“ENF”) dated April 28, 2020, submitted by the City of Boston’s Public Works Department (“BPWD”) for the proposed **Northern Avenue Bridge Replacement Project** which includes the demolition of the existing bridge and appurtenances and replacement with a new multiuse stationary bridge mainly for pedestrian and bicycle use but also potential transit and private buses, and allowing for emergency vehicles. The new bridge will be closed to other private vehicular traffic. The existing bridge is a steel four-span, 643-foot, pivot swing-bridge with a steel truss span located over Fort Point Channel at its connection to Boston Inner Harbor connecting Downtown to the Seaport District in South Boston. The bridge was closed to vehicular traffic in 1997 because of severe deterioration and subsequently in December 2014 closed to all pedestrian traffic for safety concerns. In order to allow for continued passage of vessels the swing span was left in the open position.

As stated in the ENF, this Project will require a number of Permit/Licenses and other Approvals from MassDEP. In this regard, AECOM, on behalf of BPWD, recently submitted to MassDEP a BRP WW 26 Combined License/Permit for Waterways and 401 Water Quality Certification (“WQC”) Application for this Project. Since 2016, MassDEP has been working

closely with BPWD and various permitting and resource agencies relate to environmental review and future permitting of the demolition of the bridge, particularly the following aspects: (1) removal of loose and flaking lead paint/debris from the steel superstructure (to allow for recycling of the steel); (2) abatement of Asbestos Contaminated Material ("ACM") at the Tender's House; (3) removal of the wood/concrete/steel decking; (4) dredged sediment and excavated soil management; (4) removal of the extensive pile-field; and (5) all activities and operations proposed to be performed at Dry Dock 4 at 209R Northern Avenue, South Boston.

Oil and Hazardous Materials

Because of the sensitive nature and public access/use surrounding the bridge location, demolition of the existing structure will require implementation of comprehensive mitigation and monitoring plans. This is particularly relevant to the removal/collection of the loose and flaking lead paint/debris, ACM abatement at the Tender's House, and removal of the decking. BPWD is proposing to cut the bridge truss sections into manageable segments, lower them onto a work barge, transport to Dry Dock 4 in South Boston, lift the segments onto the northern pier portion of Dry Dock 4 where removal of loose and flaking lead paint/debris will be performed and then barge transport of the steel that would then include only "intact" lead paint to the nearby Schnitzer Yard for recycling. Even though the loose and flaking paint/debris removal operations will be performed at Dry Dock 4, in order to perform the bridge cuts, lead paint removal will be necessary for at least 6-inches on either side of the cuts. During the cuts and dismantling/lowering of bridge segments, there is the potential for a certain amount of lead paint/debris and dust to be released that will require specific mitigation measures/actions to contain/collect these materials. MassDEP will require that BPWD and its Contractor develop and submit to MassDEP for review and approval a "Comprehensive Lead Safe Renovation Work Plan(s)" for activities at both the Bridge and Dry Dock 4. In this regard, MassDEP is attaching for MEPA's information and use during its review and assessment of this Project two (2) MassDEP Approvals to BPWD (and other Parties) for the 2015 demolition of the Long Island Bridge in Boston/Quincy which included detailed procedures and conditions for the management of loose and flaking lead paint/debris. The following is a partial listing of key requirements/conditions that were included in the Long Island Bridge Project and which will be incorporated into the Northern Avenue Bridge Project:

- ☐ Placement of a specifically outfitted work barge under the section of the bridge that is being cut and lowered to catch/contain any lead paint/debris and dust that might fall off the bridge during this phase of the work.
- ☐ Development of a comprehensive operations plan for all activities proposed to be performed at Dry Dock 4.
- ☐ Development of a plan to remove, transport and recycle or dispose of the bridge decking.
- ☐ Development and implementation of a comprehensive air monitoring plan at both the bridge and Dry Dock 4. This will include monitoring for lead and PM10 dust at both the bridge and Dry Dock 4 locations, and asbestos fiber monitoring at the bridge during the ACM abatement work at the Tender's House. MassDEP's Approval will include specific not-to-exceed criteria, notifications to MassDEP of any exceedances and implementation of mitigation measures which might include cessation of work.

- ❑ Temporary secured storage facility(ies) for storage of all known/suspect lead paint/debris and its periodic transport by a Licensed Hazardous Waste Hauler to an approved disposal facility.
- ❑ Ongoing Best Management Practices (“BMPs”), including periodic cleaning of all areas that have come into contact with lead paint/debris, including HEPA vacuuming.
- ❑ Detailed record keeping and specific procedures for submittal of air monitoring results to MassDEP; daily for lead and asbestos monitoring, weekly for PM10 dust, and weekly submission of a comprehensive summary report.
- ❑ The contractor/sub-contractors will be submitting means-and-methods work plans to BPWD for review and approval. A number of these will be required to be submitted to MassDEP for review and approval once BPWD has accepted the submissions. MassDEP will provide a list of which contractor submittals will require MassDEP review and approval once the bidding documents are prepared.

Dredging Program

The ENF states that approximately 2,400 CY of sediment will need to be dredged to allow for the removal of existing piers and installation of new piers and related facilities. MassDEP has recently discussed this activity with representatives from BPWD and based on the procedures required by MassDEP for similar work at the North Washington Street Bridge, MassDEP and BPWD agreed on a fast-track sediment sampling phase to collect surficial sediment (approximately the top-foot), analyze for Total and TCLP-Lead, and determine whether this surficial layer might exceed the EPA RCRA criteria of 5 mg/l in the extract from the TCLP-Lead analysis. If it exceeds this threshold, the sediment would be classified as a Potential Characteristic Hazardous Waste. The 401 WQC Application includes a sediment Sampling and Analysis Plan (“SAP”) which is being reviewed as part of the processing of the overall Application.

On June 3, 2020, MassDEP received “Initial Sediment Sampling Results” from AECOM which include the following statements: “Initial Sampling Results were received 5/15/2020 and are summarized in the attached Summary Results Table. Initial indications are that the sediments are contaminated with Arsenic, Lead, hydrocarbons (PAHs/semi-volatiles and total petroleum hydrocarbons – TPH) and sulfides. In regard to TCLP, all sample results were non-detect, so non-hazardous [waste]. Sediments may still require further TCLP testing after they are dredged/excavated and prior to shipment”. MassDEP will continue to work with the City, AECOM and the eventual contractor to determine appropriate reuse/disposal alternatives and whether additional sampling will be necessary.

Wetlands and Waterway Programs

WETLANDS PROGRAM

BPWD has submitted to the Boston Conservation Commission (“BCC”) a Wetlands Protection Act Notice of Intent (“NOI”) under 310 CMR 10.00 and the BCC’s Wetlands Ordinance for this Project. The Project will cause both temporary and permanent impacts to coastal wetland resource areas, including Land Under the Ocean, Land Containing Shellfish,

Coastal Bank and Land Subject to Coastal Storm Flowage due to existing pier demolition, new pier construction, reconstruction of the western and eastern abutments, and removal of the pile-field. MassDEP has recently provided comments on the NOI to the BCC and BPWD.

The description and calculations of permanent and temporary impacts to LUW in the NOI and ENF is confusing. Based on the figures in NOI form, a total of approximately 42,948 s.f. of LUW will be altered by the project. Approximately 40,460 of this total is described as temporary and 2488 s.f. is permanent. The amount of LUW to be "restored" is described as a "net habitat increase" of 1425 s.f. which apparently will result from the removal of piles. The narrative of the NOI lists several areas of work where LUW will be altered, along with the square footage of "recolonized areas." However, it is unclear what specific habitat improvements will be made, or whether the removal of the pile field is being considered an improvement in and of itself. In addition, the NOI lists a dredge volume of 2407 c. y. but the narrative (Section 4-1) states that approximately 3913 cy of sediment will be removed. These inconsistencies should be addressed and a discussion explaining of how the removal of the pile field will result in an improvement to habitat functions of LUW should be provided.

Both the ENF and NOI state that the entire pile-field will be removed through a procedure of cutting the piles at least two (2) feet below the mud-line, placement on a work barge and delivery to Dry Dock 4 for eventual permitted disposal. MassDEP strongly supports the complete removal of the pile field.

WATERWAYS PROGRAM

The ENF correctly identifies the project's jurisdiction under M.G.L. Chapter 91 and the Waterways Regulations at 310 CMR 9.00 as being located within filled and flowed Commonwealth Tidelands and the requirement for a new Waterways License for the project. The Department has determined that the proposed bridge meets the regulatory criteria for water-dependent use projects as stipulated at 310 CMR 9.12(12)(a)4 and 310 CMR 9.12(2)(d) and as such is presumed to meet the proper public purpose requirements as stipulated in 310 CMR 9.31(2)(a).

The existing bridge was authorized by Chapter 381 of the Acts of 1903 and subsequently issued Waterways License No. 2869 on July 18, 1904 by the Board of Harbor and Land Commissioners. Several licenses followed as correctly listed in the ENF.

Following the filing of the ENF, the Department received an Application for a Combined Chapter 91/Water Quality Certification and will commence formal review upon the issuance of a Secretary's Certificate completing MEPA review.

The Department did not identify any substantive concerns related to the proposed project that would prevent the issuance of a new license at the conclusion of the mandated public review stipulated in 310 CMR 9.00. In addition to a comprehensive demonstration of the project's

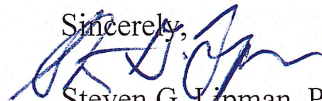
compliance with the Waterways Regulations, the Department anticipates that the applicant has or will provide the following in support of the application:

- Comprehensive list of all prior waterways licenses and Acts of Resolves pertaining to existing fill and structures at the project site;
- Maps, figures and there exhibits as needed to identify the location and extent of previously authorized or existing structures and fill at the project site;
- Information related to the proposed dredging to confirm its status as “maintenance” or “improvement” dredging;
- Sediment analysis data as may be required to determine if the dredged material would be suitable for use as beach nourishment, and if such use is proposed;

MassDEP has reviewed the information in the City’s ENF and related documents, and concurs with BPWD’s determination that **Project Alternative 5 – Complete Bridge Replacement** is the Least Environmentally Damaging Practicable Alternative (“LEDPA”).

The MassDEP appreciates the opportunity to comment on this proposed project. If you have any questions regarding these comments, please contact me at Steven.Lipman@mass.gov or at (978) 979-4648 [cell].

Sincerely,



Steven G. Lipman, P.E.
Commissioner’s Office

cc:

Para Jayasinghe, BPWD
Thomas Keough and Maeve Bartlett, AECOM
Brona Simon, Massachusetts Historical Commission
Eric Worrall, Rachel Freed, John Macauley, Matthew Barber, Edward Braczyk, David Wong, Derek Standish, Daniel Padien, Susan You, and John Viola, MassDEP



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

March 3, 2015

Keith Catanzaro
Walsh Construction Company
45 Shawmut Road, 3rd Floor
Canton, MA 02021-1400

Glenn Ferguson
Green Environmental, Inc.
296C Weymouth Street
Rockland, MA 02370

Dana J. Zewinski
J.R. Vinagro Corporation
2208 Plainfield Pike
Johnston, RI 02919

Para Jayasinghe
City of Boston – Department of Public Works
One City Hall Plaza – Room 710
Boston, MA 02201

Boston/Quincy - Long Island Bridge Project
Lead Based Paint Removal -
Lead-Safe Renovation Work Plan
File No.: FMF# 483085
Approval with Conditions

Dear Messrs. Jayasinghe, Catanzaro, Zewinski and Ferguson:

The Massachusetts Department of Environmental Protection (“MassDEP” or the “Department”) acknowledges receipt of a document titled: “Green Environmental, Inc., Long Island Bridge, Lead-Safe Renovation Work Plan”, dated February 27, 2015, filed on behalf of the City of Boston Public Works Department (“BPWD”), Walsh Construction Company (“Walsh”), and J.R. Vinagro Corporation (“Vinagro”) and Green Environmental, Inc. (“Green”) for work to be performed at the City of Boston’s Long Island Bridge located in Quincy and Boston.

Below is a chart of certain key parties involved in conducting the Long Island Bridge Demolition project, and their respective roles with respect to the Lead Safe Renovation Work Plan.

Long Island Bridge Project – Lead Based Paint Removal – Lead Safe Renovation Work Plan	
<i>Party</i>	<i>Role</i>
City of Boston, through its Public Works Department	Owner of Long Island Bridge, Project Proponent
Walsh Construction Company	General Contractor
J.R. Vinagro Corporation	Sub-contractor, including specified responsibilities involving lead paint removal, demolition, metal recycling and metal shearing activities
Green Environmental, Inc.	Sub-contractor, including specified lead paint removal activities
Test-All Environmental	3 rd Party providing Inspector(s) who have successfully completed Lead-Safe Contractor-Supervisor training

The Lead-Safe Renovation Work Plan (“Proposal”) concerns the removal and disposal of loose and flaking paint associated with the Long Island Bridge’s metal structure, as part of the pre-demolition activities of the sixteen (16) bridge spans. The Proposal concerns the lead-safe renovation of Spans 2, 3, 4, 5, 6, 7, 8, 9 10, 12, 13, and 14.¹ These lead-safe renovations will be conducted in place, on the Bridge, to remove loose and flaking paint that is safely accessible via boom lifts located on the work barge. This renovation work will prevent and minimize the potential for impact to the environment.

The specific activities to be performed will include multiple two-person work-crews. One worker will commence scraping of loose and flaking paint, while the second worker will capture released paint chips and any dust with a high-efficiency particulate arrestance (“HEPA”) vacuum. The nozzle of the HEPA vacuum will be placed directly behind the scraping tool, such that loosened paint will be immediately captured. The crew-members will use appropriate personal protective equipment (“PPE”) and respirators during all such activities. Upon completion of work, all exterior surfaces worked on and all work areas will be thoroughly cleaned using either wet-wiping or HEPA vacuuming.

¹ The Proposal does not address lead-safe renovation of Spans 1, 11, 15 or 16. The lead-safe renovations of those spans will be subject to conditions set by the MassDEP in connection with the Lead Compliance Plan submitted by Vinagro. Those spans will not be dropped by controlled detonation, but instead will be lifted by cranes onto barges and floated to Everett, where the lead-safe renovations will be conducted, in addition to shearing, to prepare the metal for recycling.

After cleaning of work areas, a Lead-Safe Contractor-Supervisor-trained professional from Test-All Environmental will conduct a 3rd-party visual inspection of the remediated surfaces and work area to verify that there is “no visible loose or flaking paint”. Once the 3rd party has verified that a level of “no visible loose or flaking paint” has been achieved, the work area will be dismantled.

Due to the poor existing structural conditions of the Bridge, safe access by the work crews to all areas of the Bridge may not be possible. In such cases, remedial work may be limited to those areas that the workers can safely access, as determined in the professional opinion of the supervisory staff from Green and Vinagro, in consultation with the senior structural engineer for the project.

Staff from MassDEP’s Bureau of Air and Waste and the Commissioner’s Office have reviewed the Proposal and appended documentation, and MassDEP hereby APPROVES the Proposal, subject to the following conditions.

- (1) Any notifications under or concerning this Approval with Conditions shall be sent to: Steve Lipman, Susan Ruch, John Keating, Edward Braczyk and Rachel Freed of the MassDEP. Notifications may be sent by email.
- (2) MassDEP shall be notified in writing prior to the initiation of any lead-safe renovation of the Bridge, to allow MassDEP the opportunity to perform a pre-operation inspection.
- (3) Representatives from Green and Vinagro shall directly oversee the management of site operations related to the lead based paint management activities.
- (4) The lead-safe renovation work shall be conducted as set forth in the Proposal, subject to the conditions in this Approval.
- (5) No section of the Bridge may be dropped unless and until all areas of that section that can be safely reached have been subject to the lead-safe renovation procedures, and the 3rd party has verified that the work has achieved a level of no visible loose or flaking paint.
- (6) No lead-safe renovation work may be conducted if wind speeds meet or exceed twenty miles per hour (20 m.p.h.).
- (7) Lead-safe renovation workers shall be trained to cease work immediately at any time that they can see that the work method is not successfully capturing the loose paint chips and/or any related dust. Workers shall be required to immediately notify the on-site supervisor. Green and Vinagro shall promptly assess and appropriately address the issue. This could include, for instance, stopping the lead-safe renovation work shift, if the work method is not successfully capturing the paint chips and dust due to windy conditions, even if less than 20 m.p.h.
- (8) Best management practices (“BMPs”) shall be implemented and maintained, with respect to specific on-site activities, to prevent and minimize any lead paint falling into the harbor.
- (9) The Owner, Contractor, and relevant sub-contractors shall take all actions necessary to ensure that operations do not cause a “condition of air pollution” (including, but not limited to, off-site nuisance conditions) as required in 310 CMR 7.01 and 310 CMR 30.205(13).

- (10) Any equipment that comes into contact with Lead Based Paint (“LBP”) materials shall be properly decontaminated prior to leaving the Site.
- (11) All LBP waste shall be properly containerized and labeled during on-site movement, temporary storage, and off-site removal.
- (12) Storage of any individual drum of LBP on the site cannot exceed ninety (90) days from the date accumulation in such drum begins.
- (13) The drums shall be DOT-approved (UNIA2) and labeled in accordance with 310 CMR 30.322 (labeling), 30.323 (marking) and 30.324 (placarding).
- (14) Daily records shall be made and maintained, including but not limited to weather and wind conditions, lead-safe renovation work hours, number of crews, any issues that arise and how they were resolved, and amounts of LBP waste generated.
- (15) Within three (3) calendar days of completion of the removal of loose or flaking paint off the first section of the Bridge, Vinagro and Green shall submit a letter to MassDEP summarizing the paint removal work that was performed including, at a minimum, any issues that arose and how they were resolved, lessons-learned, and whether any changes should be made to the currently approved Plan. Lead-safe renovation of the next Bridge section may proceed forward as currently approved and does not need to await MassDEP’s review of the letter, but the project proponents shall not proceed with demolition of the next Bridge section until MassDEP has reviewed the letter report and has issued in writing permission to proceed.
- (16) Within thirty (30) calendar days of completion of all renovation activities, a Lead-Safe Renovation Completion Report shall be submitted to MassDEP, which shall, at a minimum, summarize the activities performed by Green, Vinagro and Test-All, any issues that arose and how they were resolved, and relevant back-up documentation such as photographs, inspection forms, correspondence, etc.

By performing work pursuant to this Approval with conditions, the parties acknowledge and agree that failure to strictly comply with the Proposal and all conditions set forth in this Approval may result in immediate revocation of this Approval and that the parties may be subject to enforcement action by MassDEP. MassDEP reserves any and all rights it may have to take enforcement action against other parties for violations of MassDEP’s regulations that occur during the activity that is the subject of this Approval.

The facility owner shall not use any contractor or consultant, other than those designated in the Proposal (which has been approved and incorporated into this Approval), without first obtaining prior written authorization from MassDEP.

This Approval does not negate the responsibility of the property owner, the contractors, subcontractors or consultants from complying with the provisions of 310 CMR 7.00 and 310 CMR 30.000 except as specified under this Approval, and other applicable federal, state and local regulations.

In the event that the parties want to propose any changes to the Proposal as approved, the parties shall make such request in writing to MassDEP with appropriate documentation. No such changes may be implemented unless and until MassDEP issues written approval of such changes.

In the event that MassDEP believes that the Proposal as approved is not appropriately protective as the work is being conducted, MassDEP may require that the parties to submit proposed changes to the Proposal. The parties shall cooperate with MassDEP to resolve any issues of concern.

If you have any further questions regarding this matter, please contact John Keating at (978) 694-3266, Edward Braczyk at (978) 694-3289, or Steven Lipman at (617) 292-5698.

Very truly yours,

Susan Ruch
Deputy Regional Director
MassDEP – Northeast Region

e-cc: *(by electronic mail)*
Carl Pennor, Test-All Environmental
Para Jayasinghe (BPWD)
Boston Public Health Commission
Quincy Health Department, Attention: Jane Gallahue
Paul Davis, GZA
John Ennis, STV
Samuel Moffett, TRC Solutions
Nikole Bulger, STV
Paul Sneeringer, ACOE
Katelyn Ostrakis, Mass Division of Marine Fisheries
John Keating, MassDEP/NERO-BAW
Edward Braczyk, MassDEP/NERO-BAW
Eric Worrall, MassDEP/NERO
Rachel Freed, MassDEP/NERO
Steven Lipman, MassDEP/Boston-Commissioner's Office



Commonwealth of Massachusetts
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Secretary

Martin Suuberg
Commissioner

March 9, 2015

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Dana J. Zewinski
J.R. Vinagro Corporation
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Johnston, RI 02919

Para Jayasinghe
City of Boston – Department of Public Works
One City Hall Plaza – Room 710
Boston, MA 02201

Re: Long Island Bridge Demolition Project
Lead Compliance Plan
**Everett – Temporary Shearing Yard, Recycling
Boston/Quincy – Lead Management Activities
Approval with Conditions**

Dear Messrs. Jayasinghe, Catanzaro and Zewinski:

The Massachusetts Department of Environmental Protection (“MassDEP” or the “Department”) acknowledges receipt of a Proposal titled: **LEAD COMPLIANCE PLAN, Long Island Bridge, Boston, Massachusetts**, as revised through February 27, 2015,¹ prepared by J.R. Vinagro Corporation (“Vinagro”).

The Plan presents details of the means and methods for performing the structural demolition of the City of Boston’s Long Island Bridge (“LIB” or “Bridge”), and addresses certain regulatory requirements for preparation of steel bridge components, preparation locations, engineering controls, collection and disposal of paint (including lead-based paint or “LBP”) chips and dust, and the recycling facility where certain bridge components and certain prepared steel will be delivered. This Approval with Conditions (“Approval”) primarily addresses the operation of two temporary, contained work pads, which will be located in Everett, including removal of concrete from Bridge sections, certain lead-safe renovation work of Bridge Spans 11, 1, 15 and 16, and temporary storage and shearing of Bridge sections, which are partially coated with LBP. This Approval also addresses certain lead management issues at the Bridge work site, in Boston and Quincy, as specified in the Plan.²

¹ As noted herein, several documents were subsequently submitted (e.g., the Containment Pad Construction Detail, submitted on March 1, 2015), which are deemed to be part of the Proposed Plan (“Plan” or “Proposal”).

² A related Lead-Safe Renovation Plan, which sets forth plans for removing loose and flaking paint, including LBP, from Bridge Spans 2-10 and 12-14, was separately submitted and was separately approved.

This Proposal was filed by Vinagro on behalf of the City of the Boston Public Works Department (“BPWD”) and Walsh Construction Company (“Walsh”). The Plan proposes to use two locations in Everett to conduct specified work to prepare metal from the Bridge for recycling.³ Vinagro plans to use a portion of SPS New England’s yard at 95 Behen Street in Everett (“SPS Site”) as a temporary shearing yard. In addition, Vinagro plans to conduct certain operations in conjunction with Prolerized New England, LLC (also known as “Schnitzer Northeast” or “Schnitzer”) at Schnitzer’s facility at 17 Rover Street in Everett (“Schnitzer Site”).⁴ Some activities proposed in the Plan are subject to MassDEP oversight, including but not limited to MassDEP’s Hazardous Waste Regulations at 310 CMR 30.000, and Air Quality Regulations at 310 CMR 7.00.

Below is a chart of key parties involved in the metal recycling and associated lead-safe renovation work and metal shearing operations in connection with the Long Island Bridge Demolition project.

Long Island Bridge Project – Lead Compliance Plan – Preparation and Shearing Operations	
<i>Party</i>	<i>Role</i>
City of Boston through its Public Works Department	Owner of Long Island Bridge, Project Proponent
Walsh Construction Company	General Contractor
J.R. Vinagro Corporation	Sub-contractor, including specified responsibilities involving demolition, lead-safe renovation activities, metal shearing activities and metal recycling, including operation of shearing yards that will be located at: <ul style="list-style-type: none"> • SPS New England Yard, 95 Behen Street, Everett; and • Prolerized New England Co., LLC (Schnitzer Northeast) at 17 Rover Street, Everett
Prolerized New England Co., LLC (Schnitzer Northeast)	Metal Recycler

³ Used concrete shall be removed from the metal structure and shall be sent for recycling.

⁴ Schnitzer has certain permits and approvals in place that govern its metal recycling activities at its Everett facility. Pursuant to the Proposal and this Approval, certain conditions will apply to Vinagro’s temporary operations at the Schnitzer facility (i.e., setting up a contained work pad, removal of concrete from the structural steel Bridge components, collection of any incidental lead paint chips, etc.).

The specific activities to be performed as part of the Proposal include the mechanical-cutting (into approximately 25-foot sections) of spans and related super-structure of the LIB resulting from its dismantling through various land-side and water-based demolition methods, including; jacking/lifting center-span 11, land-side removal of spans 1, 15 & 16, and controlled detonation of spans 2 to 10 and 12 to 14, which will be “dropped” into the harbor and then removed and placed onto barges. All 16 spans will be barged to either the SPS Site or the Schnitzer Site. Bridge segments will arrive at both locations on barges which will tie-up to the respective facility’s bulkhead where segments will be placed onto a containment pad where all concrete will be removed. At the SPS Site, the resultant steel will be cut into more manageable sizes, and will then be placed into trailer-trucks and transported to the Schnitzer Site. The sheared steel segments will be transported from the Schnitzer Site for end-use recycling.

The proposed design and operations for these two locations will be basically identical, with Vinagro constructing both work pads and associated containment. At the Schnitzer yard, Vinagro will remove concrete from any bridge sections delivered directly to Schnitzer, but Vinagro will not be involved in any sizing (i.e., shearing) at Schnitzer’s yard.

The Proposal includes a March 4, 2015 letter from Alba Cruz-Davis, Acting Director-Everett Health Department, approving use of the SPS site for the proposed operations, subject to compliance with Best Management Practices (BMPs) described in the Proposal and in accordance with all applicable State and Federal requirements.

The Proposal states that the operations are expected to last for 8 to 10 weeks. All lead wastes will be temporarily stored at the Sites (“Temporary Storage Facility”) and subsequently transported by a licensed hazardous waste transporter to either the US Ecology facility in Detroit and/or the CWM Chemical Services LLC in Model City, New York. Based on the estimate of potential maximum-operations at the SPS Site, it has been deemed a Large Quantity Generator (LQG) of hazardous waste under MassDEP’s Hazardous Waste Regulations at 310 CMR 30.340. On March 5, 2015, Vinagro filed a completed LQG Application with MassDEP.

Staff from MassDEP’s Bureau of Air and Waste and Commissioner’s Office have reviewed the Proposal and appended documentation, and herewith APPROVES the Proposal, subject to the following conditions.

- (1) Any notifications under or concerning this Approval with Conditions shall be sent to: Steve Lipman, Susan Ruch, John Keating, Edward Braczyk and Rachel Freed of the MassDEP. Notifications may be sent by email.
- (2) The work set forth in the Proposal shall be conducted as described and depicted in the Proposal, subject to the conditions in this Approval.
- (3) MassDEP shall be notified in writing prior to the initiation of any lead-safe renovation at the SPS Site, to allow MassDEP the opportunity to perform a pre-operation inspection.
- (4) Representatives from Vinagro shall directly oversee the management of all operations related to the LBP management and other contaminants that may be generated and/or found during demolition activities, including but not limited to asbestos contaminated material.

(5) The shearing operations shall be conducted as described and depicted in the Proposal and in the Containment Pad Construction Detail, except that at the SPS Site, the pad shall be an area of approximately 48 feet by 80 feet.

A. At a minimum, 30-mil HDPE sheeting shall line the entire shearing-operations area and extend beyond the outside edges of the shearing-pad.

B. The HDPE liner will be covered with 6-mil poly sheeting then ½ inch steel plates.

C. The Plan proposed to install “silt-sac” technology on the existing catch basin at the SPS Site, but Vinagro subsequently informed MassDEP that silt-sacs for such a large basin are not available. Instead, Vinagro has placed filter-fabric just under the basin cover, with the fabric extending several feet outside of the basin. Cleaning procedures shall be carefully conducted, such that the fabric outside of the basin shall be held down by sufficient personnel and or weights to hold it firmly in place when lifting the basin cover to remove the accumulated sediment. Staff shall be trained to ensure that this procedure prevents sediment from entering the basin.

D. The dust control measures set forth in the Proposal shall be appropriately conducted during all lead-safe renovation and metal shearing activities.

E. The shearing area shall be HEPA-vacuumed on an as-needed basis, but no less than at the end of each work-shift. Vacuuming schedule shall take into account weather conditions (e.g., during windy periods, vacuuming should be performed more often to minimize the potential for lead contaminated debris and dust to escape the HDPE-lined area).

(6) Walsh, Vinagro, and any relevant sub-contractors shall take all actions necessary to ensure that operations do not cause a “condition of air pollution” (including, but not limited to, off-site nuisance conditions) as required in 310 CMR 7.01 and 310 CMR 30.205(13).

(7) The Proposal set forth a plan for air quality (AQ) monitoring at the SPS shearing yard, including locations for three (3) monitors and the specifications for the monitor (a Dust Track Desktop Model). Additional information was submitted on March 5, 2015 and a teleconference was held with MassDEP later that day, to modify the AQ monitoring plan. On March 6, 2015, a revised site location/monitoring map was provided to MassDEP.

A. Perimeter air quality monitoring shall be performed during all periods of operation, specifically: (i) real-time, high-volume particulate matter (PM) monitoring; and (ii) daily lead analyses, which shall be conducted on an expedited turnaround basis.

B. On Monday, March 9, 2015, monitoring equipment is scheduled to be moved and/or installed consistent with the revised site location/monitoring plan. MassDEP staff is scheduled to join LIB project staff at the SPS Site for such installation. The reconfigured and new AQ monitoring equipment shall be utilized as soon as it is operational and thereafter.

- C. Vinagro shall work cooperatively with MassDEP to resolve any AQ sampling or methodology questions or issues, if any, throughout the operations at the SPS Site.
 - D. Subject to the conditions herein and in accordance with the Proposal, operations on the contained work pad at the SPS Site may commence after the issuance date of this Approval. Vinagro shall notify MassDEP regarding the construction of the contained work pad at the Schnitzer Site so that MassDEP may inspect the work pad and containment, prior to operation.
 - E. Lead concentrations shall not exceed an airborne concentration of 0.14 micrograms per cubic liter of air (“ug/m³”) of lead (MassDEP’s Threshold Effects Level or “TEL”).
 - F. PM10 concentrations shall not exceed 150 ug/m³.
 - G. If any single sample exceeds either of these thresholds, all LBP operating and removal activities shall cease and MassDEP shall immediately be notified. Vinagro, and/or its environmental consultant shall then attempt to determine the cause(s) for the exceedances and shall propose appropriate mitigation procedures and/or engineering controls to reduce airborne concentrations to below the threshold. Operations shall not be reinitiated until specifically authorized by MassDEP.
 - H. The expedited lab reports on lead analyses shall be promptly e-mailed to Edward Braczyk, John Keating and Susan Ruch.
 - I. A weekly AQ monitoring report shall be provided to Steve Lipman, Edward Braczyk, John Keating and Susan Ruch and, if requested, additional MassDEP staff.
 - J. A compilation of the perimeter monitoring shall also be provided to MassDEP as an appendix to the Closure Report.
- (8) The Temporary Storage Facility shall be inspected at least daily and a written log of the results of the inspections, along with any issues found and corrective actions taken, maintained and made available to MassDEP and the Everett Health Department, if requested. This log will need to be provided to MassDEP as an appendix to the Closure Report.
- (9) Any equipment that comes into contact with the Lead Based Paint (“LBP”) materials shall be properly decontaminated prior to leaving the Site.
- (10) All LBP waste shall be properly containerized and labeled during on-site movement, temporary storage, and off-site removal.
- (11) Sufficient tracking controls must be in-place between the active shearing pad and Prolerized so that any delay or accident in transit can be expeditiously traced and emergency response can be initiated, if necessary.
- (12) Storage of any individual drum of LBP on the Site cannot exceed ninety (90) days (30 CMR 30.340(4)) from the date accumulation begins as required under 310 CMR 30.340, and the contractor shall attempt to limit accumulation time to thirty (30) days.

- (13) The drums shall be DOT-approved (UNIA2) and labeled in accordance with 310 CMR 30.322 (labeling), 30.323 (marking) and 30.324 (placarding).
- (14) Any LBP or related materials from the Temporary Storage Facility or other Site areas that exceed the RCRA TCLP-Lead criteria shall be transported by a licensed hazardous waste hauler using a hazardous waste manifest, in accordance with 310 CMR 30.310.
- (15) No speculative accumulation of materials is allowed, in accordance with 310 CMR 30.205(14).
- (16) Any solid waste, Oil or Hazardous Materials, or soil that are produced during shearing operations, storage, transportation, loading/unloading shall be managed in accordance with all applicable local, state and federal requirements.
- (17) Any suspect asbestos containing materials found during Project activities and any materials potentially contaminated by them shall be separated, sampled, and managed in accordance with applicable state and federal requirements. In addition, MassDEP shall be notified as soon as such materials are found.
- (18) Site runoff controls (310 CMR 30.521(10)(c)) and security (310 CMR 30.514) shall be provided.
- (19) Vinagro shall install and maintain best management practices (“BMPs”) to limit site drainage from passing onto or through active shearing areas, the Temporary Storage Facility, or potential initial steel lay-down location and shall collect and properly dispose of any liquid that accumulates on or passes over the HDPE-lined shearing area. All such liquid must be analyzed for TCLP-Lead to determine if it is a regulated hazardous waste.
- (20) Within three (3) business days of Project completion activities and removal of project related materials/equipment, the parties shall HEPA vacuum the paved areas underlying and/or within 3-feet of the HDPE-lined area and other areas that may have been contaminated.
- (21) Closure of the Site must comply with 310 CMR 30.580, and the Closure Report shall be submitted to MassDEP within thirty (30) calendar days of cessation of operations at each Site.
- (22) Vinagro shall maintain a daily inspection/operation form for both the SPS Site and the Schnitzer Site (at Schnitzer, limited to the LIB metal shearing operations).
 - A. A draft of the proposed form shall be submitted to MassDEP for approval.
 - B. Copies of these completed forms shall be maintained at the relevant Site and copies sent to MassDEP on a weekly basis.

(23) All of the above-mentioned conditions and BMPs shall be in-place prior to the delivery of any LBP-coated steel to the SPS Site. It will be incumbent upon Walsh and Vinagro to implement and maintain relevant BMPs as they relate to specific on-site activities. Once the BMPs are in-place, but prior to initiation of shearing operations, MassDEP shall be contacted to allow for a pre-operational inspection. Operations may not commence until specifically authorized by MassDEP.

(24) As part of the land-based spans 1 (Quincy) and 15 & 16 (Boston) dismantling operations, Walsh/Vinagro shall place adequately sized 10-mil nylon-reinforced poly on “obstruction-cleared areas” onto which the spans will be temporarily placed in preparation for lifting onto barges for transportation to the SPS Site. Directly after completion of the span-transfer to the barge, the poly shall be HEPA vacuumed and the poly disposed. In addition, a combination of visual observations and magnetic-device procedures will be performed of the ground under/around the poly and at all areas where LBP, steel, and concrete may have fallen/come-to-rest during the span dismantling, lowering, and placement onto barges.

(25) MassDEP personnel shall be provided prompt access to all work areas described in the Proposal.

(26) A copy of the Approval with Conditions shall be kept at the SPS Site, the Project Office trailer and on the barges that will be used to transport the Bridge sections to Everett.

(27) The City, Walsh and Vinagro shall not use any contractor or consultant, other than those designated in the Proposal that has been approved and incorporated into this Approval, without first obtaining prior written authorization from MassDEP.

(28) In the event that the parties want to make any substantive changes to the Proposal as approved, a written request shall be submitted to MassDEP with appropriate documentation. No such changes may be implemented unless and until MassDEP issues written approval of such changes.

By performing work pursuant to this Approval with Conditions, the parties acknowledge and agree that failure to strictly comply with the Proposal and all conditions set forth in this Approval may result in immediate revocation of this Approval and such failure may be subject to enforcement action by MassDEP. MassDEP reserves any and all rights it may have to take enforcement action against any person for violations of MassDEP’s regulations that occur during the work that is the subject of this Approval.

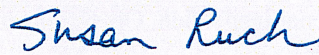
This Approval does not negate the responsibility of the property owner, the contractors, subcontractors or consultants from complying with the applicable provisions of federal, state and local regulations.

In the event that MassDEP believes that the Proposal as approved is not appropriately protective as the work is being conducted, MassDEP may require that proposed changes be submitted to MassDEP in writing. The parties shall cooperate with MassDEP to resolve any issues of concern.

Any correspondence or critical communication to MassDEP related to this Approval shall be directed to Susan Ruch, John Keating, Edward Braczyk, Steven Lipman and Rachel Freed.

If you have any questions regarding this matter, please contact Steven Lipman at (617) 292-5698 or me at (978) 694-3384.

Very truly yours,



Susan Ruch
Deputy Regional Director
MassDEP – Northeast Regional Office

e-cc: *(by electronic mail)*

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John Ennis, STV
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Nikole Bulger, STV
Keri Fitzpatrick, Schnitzer Northeast
John Keating, MassDEP/NERO-BAW
Edward Braczyk, MassDEP/NERO-BAW
Rachel Freed, MassDEP/NERO
Eric Worrall, MassDEP/NERO
Steven Lipman, MassDEP/Boston-Commissioner's Office

LIBR Project Lead Paint Steel Shearing Facility 3 9 15 FINAL



The Commonwealth of Massachusetts

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KATHLEEN A. THEOHARIDES
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RONALD S. AMIDON
Commissioner

DANIEL J. MCKIERNAN
Director

June 16, 2020

Kathleen Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office, Alex Strycky
100 Cambridge Street, suite 900
Boston, Ma 02114

RE: EEA# 16194 Northern Avenue Bridge Replacement Project

Dear Secretary Theoharides:

The Division of Marine Fisheries (MA DMF) has reviewed the Environmental Notification Form (ENF) for the replacement of the Northern Avenue Bridge submitted on behalf of the City of Boston Public Works Department. The proposed project consists of replacing the existing deteriorated steel frame bridge that connects Boston's seaport district to Downtown. The bridge runs across the mouth of the Fort Point Channel, a maritime channel that feeds into Boston Inner Harbor. On March 10, 2020, MA DMF staff attended a pre-app meeting with NOAA's National Marine Fisheries Service (NMFS) and the project's applicants and consultants to discuss options to avoid impacts to marine fisheries resources. Below we provide information on marine fisheries resources at the project site and the project's potential impacts to those resources.

Current Conditions

The Northern Avenue Bridge is a steel four-span, 643-foot long, pivot swing bridge with a steel truss span. Due to severe deterioration, the bridge was closed to vehicular traffic in 1997. By December 2014, it was closed to pedestrian traffic for safety concerns and closed to vessel traffic below for hazard concerns. Because of this it was left in its current open position. The bridge rests on granite block piers and abutments which are supported by concrete foundations and friction piles. There is also an existing fender system and wood piles (including remnant deteriorated piles) scattered within the middle of the channel.

Marine Fisheries Resources

Boston Inner Harbor is essential habitat for the spawning and juvenile development of winter flounder (*Pseudopleuronectes americanus*), an important commercial and recreational species in the region. Winter flounder eggs are demersal and adhesive, forming clusters which are extremely vulnerable to smothering by settling sediments. Juvenile fish use the intertidal and nearshore areas during development for forage and shelter. The Inner Harbor provides passage for the Charles River and Mystic River anadromous fish runs.

New Bridge

The proposed bridge is a stationary pedestrian and bicycle bridge that would also allow potential transit (bus) and emergency vehicle access. The purpose of the project is to connect the Downtown and South Boston Waterfront neighborhoods of Boston. The bridge features a “Promenade” located where the old bridge swung open. This will be utilized as open space to enhance public access to and enjoyment of the waterfront.

Construction will cause approximately 40,460 square feet (SF) of temporary and 2,488 SF of permanent impacts to coastal wetland resource areas including Land Under the Ocean (LUO), Land Containing Shellfish, and Coastal Bank. However, approximately 3,913 SF of structures (existing piles and piers) will be removed, resulting in a net increase of 1,425 SF of LUO. The reconstruction work starts with the removal of the superstructure via barges. Next, a series of cofferdams will be installed around the existing piers to be demolished, around the locations of the new piers, and along the eastern and western seawalls to allow for the reconstruction of the bridge abutments. Approximately 2,407 cubic yards (CY) of sediment will be removed around the areas of the existing and proposed piers and disposed of on shore. The existing wooden piles will be removed, followed by installation of new steel piles that will support the new piers and Promenade. Finally, removal of the cofferdams, construction of the new bridge and promenade, and installation of a new bridge fender system.

MA DMF Recommendations

To minimize adverse effects to marine fisheries resources and habitats, MA DMF would typically recommend avoiding in-water, silt producing work during the critical life stages of the above listed species, from February 15 to June 30. However, for the applicant to meet hard timelines for the project, the applicant has requested to work within the Time-of-Year (TOY). The construction of the project is anticipated to begin in February 2021 and last for 14 months. During the pre-app meeting, MA DMF and NMFS recommended the applicant develop a series of Best Management Practices (BMPs) to protect marine fisheries resources while working during the TOY. Additionally, we recommend project sequencing to plan the most impactful and higher silt-producing work to occur outside the TOY with less impactful, in-water work occurring inside the TOY only where necessary.


Best Management Practices

A floating boom with an attached turbidity curtain will be installed surrounding any activity that occurs in-water (i.e. cofferdam installation, pile driving, pile removal, etc). The turbidity curtains will be ballasted on the bottom and mid-curtain to mitigate billowing. A depth indicator will be used to verify curtain depth. Installation of cofferdams will be done via vibratory hammers. All cofferdam installation, pile installation and pile removal will be accomplished via barge mounted equipment, with the assistance of divers as needed. To minimize dredge impacts, work will be done within cofferdams via mechanical dredging with an environmental bucket. For pile work, the contractor will place a floating siltation boom along the edge of the fender system and piles. The existing piles will be cut 2-feet below the mudline and new steel piles will be installed via vibratory pile driving. Startup for in-water work will be gradual, such that aquatic organisms in the vicinity of the work areas have the appropriate opportunity to seek refuge from the existing piers and avoid these areas during active construction. Installation of steel piles and sheet piling is proposed via vibratory hammers, but if for any reason impact hammers are required, nylon or wood block will be used, and acoustic ramp-up procedures will be followed.

MA DMF is pleased to see the above proposed BMPs. Additionally, we recommend that all barges be prohibited from grounding. We also recommend turbidity and noise monitoring to ensure that the recommended thresholds are not exceeded.

Thank you for considering our comments. If you have any questions about this review, please email Kate Frew at Kate.Frew@mass.gov.

Sincerely,

A handwritten signature in black ink, reading "Daniel J. McKiernan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel J. McKiernan
Director

cc.

M. Johnson, NOAA NMFS

E. Hokenson, B. Boeri, MA CZM

B. Newman, ACOE

K. Ford, T. Evans, M. Rousseau, MA DMF

P. Jayasinghe, Boston PWD

From: [Julie Battisti](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: EEA 16194 Northern Avenue Bridge Replacement
Date: Thursday, May 28, 2020 10:22:41 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Strysky,

The Northern Avenue Bridge Replacement is an opportunity for the City of Boston to take a bold step and accomplish two things:

1. further develop pedestrian only space within a city overcome by the significant negative effects brought on by intense traffic congestion
2. be innovative rather than redundant - we have three vehicle bridges in place already. Think park in the sky, like the high line in nyc.

It is perfect timing for the City of Boston to take this opportunity to design space that is oriented to its residents and visitors rather than to more vehicle congestion. And with COVID19, open space for Boston residents is that much more important.

Respectfully,
Julie Battisti

From: [joseph carsuo](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: EEA 16194 Northern Avenue Bridge Replacement
Date: Thursday, May 28, 2020 4:14:41 PM

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Dear Mr. Strysky,

I am a Boston resident interested in the Northern Avenue Bridge. Even though I was prepared not to like it, I like the design very much. I feel that it incorporates the feel of the historic bridge. I like the lighting and the two level aspect of it.

I don't, however, see a need for transit to go across that bridge as buses can cross via Northern Avenue instead. I would like to see it be a pedestrian only bridge. Instead of transit lanes, There could be more landscaping or some small, interesting retail.

There is a need for public transportation, street cars, people movers etc in the Seaport, but not on this bridge.

Thank you, Joseph Caruso

From: [Charles Denison](#)
To: [Strysky, Alexander \(EEA\)](#)
Subject: EEA 16194 Northern Avenue Bridge Replacement
Date: Sunday, June 7, 2020 4:15:41 PM

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Dear Mr. Strysky,

As a Boston resident and someone who works downtown, my preference for the Northern Ave Bridge would be to create an exact replica of what was there before. The historic structure should never have been neglected to the point of being unable to be restored, and therefore should be rebuilt as it once was.

If that is not possible, I would like to see a design that references the architecture of the historic structure. The current truss design comes pretty close to that.

Most importantly, the Northern Ave Bridge should NOT carry any motor vehicle traffic, whether it is buses or cars, private or public. Adding traffic capacity to this area would only increase the number of vehicles and increase the amount of noise and pollution in the area. The existing structure was open to only pedestrians and bicycles for many years, and any new structure should continue to be the same. This is an opportunity for placemaking and for creating a quiet, clean, car-free space for people to enjoy. It is better for the environment and better for our city as a whole.

Thank you for considering my comments.

Charles Denison

From: [Paul Swartz](#)
To: [Strysky, Alexander \(EEA\)](#)
Cc: comments@walkboston.org
Subject: feedback on Northern Avenue Bridge
Date: Monday, June 8, 2020 6:16:25 PM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello Alex,

My name is Paul Swartz, and I live at 50 H St in South Boston. I appreciate all the outreach that MEPA is doing for the bridge design, given that we can't meet in person.

The bridge as designed right now is too expensive and too large for what we need. \$100 million is too much, when a pedestrian-only bridge could be built for a fraction of that. We need and want a pedestrian/bike connection, like it had for years before being closed, and no one will want to use a bridge choked with shuttles waiting to merge into the already bumper-to-bumper Atlantic Avenue. If shuttles are going to be included in the bridge, they must be physically separated from pedestrians and cyclists: paint alone is not safe enough.

Thank you for your time.

-p



Kathleen A. Theoharides
Secretary of Environmental Affairs
100 Cambridge Street, Suite 900 Boston, MA 02114
Attn: Alex Strysky, MEPA Unit (via email)

June 9, 2020

RE: MEPA File No. 16195—ENF for Northern Avenue Bridge Replacement Project

Dear Secretary Theoharides,

The Fort Point Neighborhood Association (FPNA) is writing to provide comments on the City of Boston's Environmental Notification Form for the proposed Northern Avenue Bridge Replacement Project located on the Fort Point Channel. FPNA serves the residential neighborhoods on the South Boston Waterfront side of the bridge commonly referred to as the Seaport and Fort Point.

The Northern Avenue Bridge is an important part of the historic fabric that characterizes the Fort Point neighborhood. It is a gateway to the rapidly developing Seaport District and the Downtown Wharf District, including the redevelopment of the adjacent Hook site. The bridge provides a vital link connecting the Boston waterfront and linking the Boston HarborWalk on both sides of the Channel while providing an additional connection to the Rose Kennedy Greenway. Before the bridge closed in 2014 to pedestrians (previously closed to cars in 1997), it had transformed into an experience bringing together communities at the water's edge.

It is a Boston icon proudly displayed in a mural at City Hall, used as a backdrop for a local news desk, and featured by Boston's tourism industry. The Northern Avenue Bridge and the bridge tender's house are prized not only locally, they are of national importance listed on National Register of Historic Places. It had been our hope that the bridge could have been restored as the preferred outcome of the City's 2015 Northern Avenue Bridge Working Group, which we were a member. Now as member of the Northern Avenue Bridge Mayoral Advisory Task Force, it is our hope that we can create a new Northern Avenue Bridge that will continue to inspire and become a new Boston icon for future generations to treasure.

In creating an iconic twenty-first century Northern Avenue Bridge, the community supports a bridge for pedestrians and bicyclists with emergency vehicles only.

A bridge putting pedestrians and bicyclists first is in line with the City's Go 2030 planning and Climate Action Plan of carbon neutrality.

Where the road hits the rubber is introducing any vehicle (other than emergency response vehicles) or transit on the bridge. MBTA's Better Buses Project recommendation is not to run buses over the Northern Avenue Bridge. The City's Summer Street Multimodal Corridor project calls for dedicated bus lanes on Summer Street to improve transit capacity. Based upon traffic analysis provided to the Task Force and public, there appears to be no discernible benefit to

The FPNA is dedicated to enhancing and preserving the quality of life in our community, to broadening citizen awareness and participation within our growing neighborhood, and to building a socially interactive civic life.

having transit on the Northern Avenue Bridge. In addition, the Boston Convention and Exhibition Center led a successful collaborative initiative last year replacing North Station bound private Seaport shuttles with water transportation. Therefore, by excluding all other vehicles (transit, private shuttles & cars) a safer, more accessible and enjoyable pedestrian and cyclist experience is created where community can connect with the added environmental benefits of reduced congestion, emissions and air pollution.

A pedestrian bike bridge also strengthens publicly accessible Harborwalk connections and adds open space to the Boston waterfront, which has become even more critical during this public health crisis.

Request For Further Exploration: The Northern Avenue Bridge design is still evolving and as a result environmental impacts are a challenge to fully comprehend. We would like to request clarification on:

- **Bridge Phases, Funding & Public Benefits:** There is confusion on what elements are part of phase one and whether they match the public benefits presented to community, especially in regards to placemaking. Also, what is the funding feasibility of subsequent phases and associated timelines? There are already concerns about how phase 1 will be funded and the actual costs. By removing transit, can the scale of the bridge design reduce in size, cost and environmental impact? If the other phases of the bridge are not funded or built, can phase 1 stand on its own and meet the stated objectives of the bridge for the next 75 years or more?
- **Bridge Approaches or Ends:** There are public safety issues with mixing cyclists and pedestrians, especially if any vehicles are approaching, on or exiting the bridge. To create climate resilient, ADA compliant, bike and pedestrian friendly approaches, can they be engineered in a way that the sloped elevations do not fence in abutters, block access to the Harborwalk or create undesirable and inefficient routes to reach the bridge?
- **Climate & Coastal Resiliency:** Although the Northern Avenue Bridge represents the last of the moveable bridges across the Fort Point Channel, we have experienced flooding from sea level rise and stormwater, and recognize the necessity of a raised, fixed bridge. We would like to learn greater details about materiality of the approaches and promenade and related climate adaption strategies.
- **Preservation of historic elements:** Reuse of vertical members, center drum, bridge tender equipment and identification of parts applicable for public art need to be detailed.

We request that the City be required to prepare an Environmental Impact Report (EIR) to address the impacts of this project. The Northern Avenue Bridge is important to us and we need to seize this opportunity to create a publicly accessible pedestrian and bicycle connection to Downtown. Thank you for your consideration.

Respectfully Submitted,

Sara McCammond

The FPNA is dedicated to enhancing and preserving the quality of life in our community, to broadening citizen awareness and participation within our growing neighborhood, and to building a socially interactive civic life.

FortPointNeighborhood.org FortPointBoston.com @FPNA_Boston P.O. Box 52122 Boston, MA 02205

June 9, 2020

Ms. Tori Kim
Assistant Secretary, EOEEA
Director, MEPA
100 Cambridge Street
Boston MA 02110

Sent via e-mail to:
Mr. Alexander Strysky
Environmental Analyst, MEPA
Director, MEPA
100 Cambridge Street
Boston MA 02110

Dear Assistant Secretary Kim and Mr. Strysky:

Please accept this letter as public comment in response to the Environmental Notification Form for the Northern Avenue Bridge project filed by the City of Boston, herein referred to as "the Proponent."

REQUEST FOR OFFICIAL STATUS AS A COMMENTER FOR FUTURE NOTICES

Please register my name on the official list of commenters on the NAB Replacement project for future notices.

Per instructions advertised by MEPA, I requested a copy of the ENF from AECOM on 5/9/2020. I received the ENF from AECOM on 5/11/20 and additional files on 5/14/20.

Despite the fact that I have routinely commented on the project during the public process, and that I requested and received a copy of the ENF from AECOM per official instructions, I did not receive official notice of the virtual MEPA meeting on 5/20/20, nor did I receive notice of the meeting from AECOM.

I was informally made aware of the 5/20/20 MEPA meeting on the day of the meeting, and was one of very few members of the general public that attended.

WHY A DRAFT EIR / EIR IS REQUIRED TO ASSESS IMPACTS

I am requesting that MEPA require submission of an DRAFT EIR/EIR based on the extraordinary scale of this project.

Contrary to claims in the ENF, the replacement bridge will impact environmental resources well beyond those of the historic Northern Avenue Bridge over the course of its lifetime.

The Proponent stated at a MEPA site meeting on May 20, 2020 that the ENF is filed to advance permits for all phases, specifically Phases 1-3, not just Phase 1.

Below is a rendering of Phases 1-3 as filed with the ENF by the Proponent.

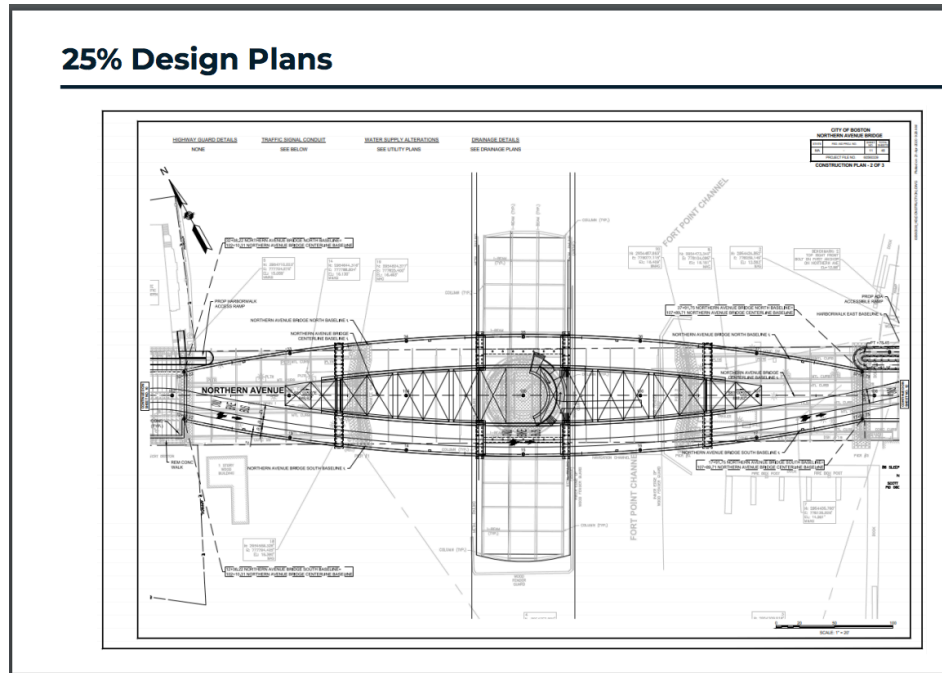


At minimum, footings and 3-D profile of the lower decks extending into the Harbor and Channel will have significantly greater impact on the watersheet than the current cantilevered design.

The Proponent recently presented what appear to be Phase 2 drawings to the public, as representative of what is being designed and permitted.

Below is the “25% Design Plans” drawing presented to the public on May 6, 2020. No discussion of phasing, or elements of the design contingent on available funding, accompanied this presentation. According to the Proponent, renderings and a video presented to the public on May 6, 2020 represent an approximation of Phase 1.

The 25% Design Plans presented to the public below were not Phase 1.



source: Presentation (PDF), 5/6/2020, Page 22

<https://www.northernavebridgebos.com/meetingmaterialsandreports>

The ENF should not satisfy an abbreviated environmental review for Phases 1-3, nor does the application seem to meet MEPA minimum guidelines for waivers of EIR process. Additional support for that assertion is provided in this comment letter.

PROPONENT INCORRECTLY CITES FUNDING SOURCES

The ENF states, “The City of Boston is funding 100% of the project.”

Identify any financial assistance or land transfer from an Agency of the Commonwealth, including the Agency name and the amount of funding or land area in acres: There is no financial assistance or land transfer from any Agency of the Commonwealth. The City of Boston is funding 100% of the project

Contrary to the ENF filing, the City of Boston has identified the need for external funding sources.

A Federal earmark of \$9.4 million for construction of a new bridge has been reported and repeatedly cited by COB and/or Task Force chair A Better City since at least 2016.

From April 2019 NAB Task Force meeting notes:

~~available now and the other \$1 million will be available at 2022~~

In total, \$58 million of funds have been identified:

- City Funding
 - General obligation bonds: \$31 million
 - Parking meter fund: \$15 million
- Federal Funding
 - 2005 SAFTEA-LU Earmark #1: \$2 million
 - 2005 SAFTEA-LU Earmark #2: \$6 million
 - 2008 Appropriations Earmark: \$1 million
 - 2010 Appropriations Earmark: \$1 million
- Private Funding
 - WS Seaport: \$2 million

Chairman Dimino asked Mr. DePaola to describe other possible

The City of Boston has failed to identify funding sources capable of meeting the estimated \$100 million cost. (NOTE: Cost is reportedly estimated at \$125 million in the Proponent’s recent Chapter 91 filing).

There can be little doubt that the Commonwealth will be a party to funding and resources.

PROBABILITY OF BRIDGE USE FOR GENERAL TRAFFIC

There is also sufficient information to conclude that an underutilized bus/shuttle lane will open to general traffic within years of bridge completion.

It is foreseeable that drivers idling in congestion on the Moakley Bridge will demand access to any underutilized vehicular resource, as we've seen elsewhere (SB Bypass, I-93 HOV, etc.).

The Proponent has not conducted a comprehensive traffic study to reveal impacts of access by general traffic.

A review of impacts resulting from vehicular traffic idling in congestion, including impacts on pedestrians seated at tables on the Promenade, and in other recreational areas, is warranted.

Why Further Study Matters

I attended every public working group meeting of the Northern Ave Bridge Task Force (excluding two large community meetings).

It was clearly evident to Task Force meeting attendees that a vehicular lane was preordained without sufficient study or justification.

Task Force chair A Better City has had a long history of advocating for vehicular traffic without justification in data.



A Better City recommended a design for vehicular traffic in the 2015 Transportation Study, developed for clients BPDA, Massport, MCCA and Massport.

In the next section, I discuss the data that drove this recommendation.

ADDITIONAL ACCESS: HIGHWAY AND ARTERIAL STREET ACCESS		
1e	<ul style="list-style-type: none"> • Implement circulation, signal, and lane management changes to improve access to/ from I-93 North at the Seaport Boulevard, Atlantic Avenue, Oliver Street intersection. • Advance the design to rehabilitate or replace the Northern Avenue bridge to accommodate pedestrians, bicyclists, and peak directional vehicular traffic. 	<ul style="list-style-type: none"> • •

ort

www.sbwaterfrontmobility.org

source:

https://www.abettercity.org/docs/2015.01.15%20SBoston%20Waterfront_Full_Report_PB.pdf

REPEATEDLY DENIED CALLS FOR DATA SUPPORTING A VEHICULAR LANE

Task Force Chair A Better City was repeatedly asked in early Task Force meetings to provide the data justifying the 2015 recommendation for vehicular access on the bridge. For a number of months, the data was not forthcoming.

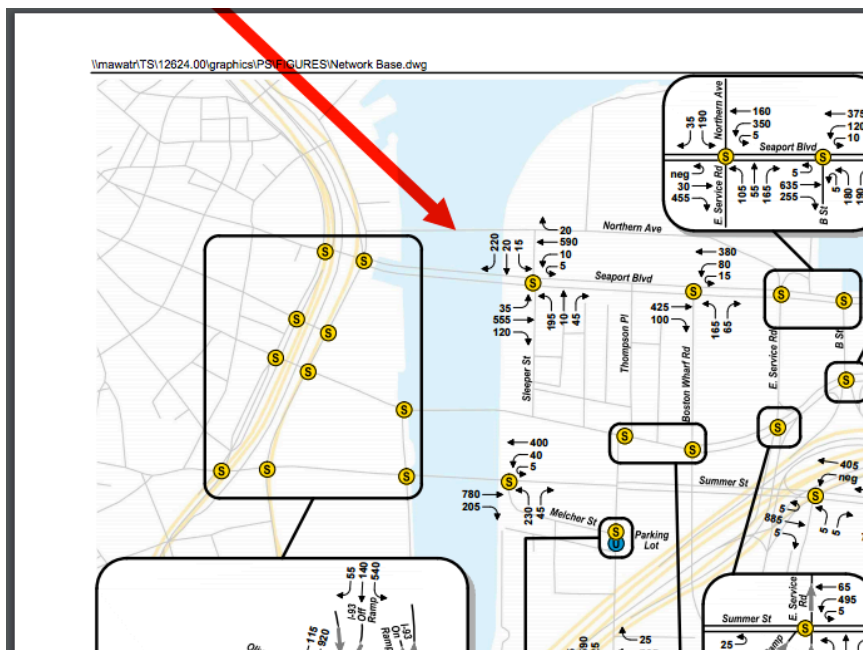
Some background:

Shortly after publication of the 2015 Transportation Plan, the website A Better City created <http://sbwaterfrontmobility.org/> was dismantled.

With the dismantling of the website in 2015, the Existing Conditions Technical Appendix justifying A Better City's recommendation for vehicular traffic on the bridge was no longer available from A Better City or (online) from official sources.

I have long maintained a complete archive of 2015 SBW Transportation Plan documents, including the Existing Conditions Technical Appendix produced in 2014 for development of the plan. <http://www.sbwtranspoplan.com>

The Existing Conditions Technical Appendix published by A Better City in 2014 did not consider the Northern Ave Bridge in the scope of its traffic study.



source:

[http://www.fortpointer.com/pages/SBWTranspoPlan2015/2014.08.08 Boston Existing Conditions Appendix.pdf](http://www.fortpointer.com/pages/SBWTranspoPlan2015/2014.08.08%20Boston%20Existing%20Conditions%20Appendix.pdf)

DECEMBER 2014 MEMO DESCRIBES BENEFITS OF GENERAL TRAFFIC ON NAB

In July 2018, in response to demands from the public and Task Force members, a memo from December 2014 was made available to justify a recommendation for vehicular traffic in the 2015 Transportation Plan.

Among other details, the 2014 memo reveals that access to the bridge by “vehicular traffic,” not exclusive access by buses/shuttles, was the focus of the recommendation.

The data in this memo, never published until 2018, was the basis for the A Better City’s 2015 recommendation of a vehicular lane on the Northern Ave Bridge.

- Improves truck access to port
- Improves pedestrian crossings

Reopening the Northern Avenue Bridge to vehicular traffic would further reduce two-way traffic volumes on Seaport Boulevard by about 400 vehicles during the morning peak hour and 450 vehicles during the evening peak hour. While reopening the bridge is not required to as part of the Seaport Boulevard/Atlantic Avenue/Purchase Street modifications, this would alleviate some additional congestion from Seaport Boulevard. However, the reduction would not be sufficient to change the findings of the lane management analysis.

Alternative R-27a-b – Seaport Boulevard/Congress Street One-way Traffic Circulation

http://www.fortpointer.com/pages/SBWTranspoPlan2015/2018.08_Northern_Ave_Bridge_Memo_Data.pdf

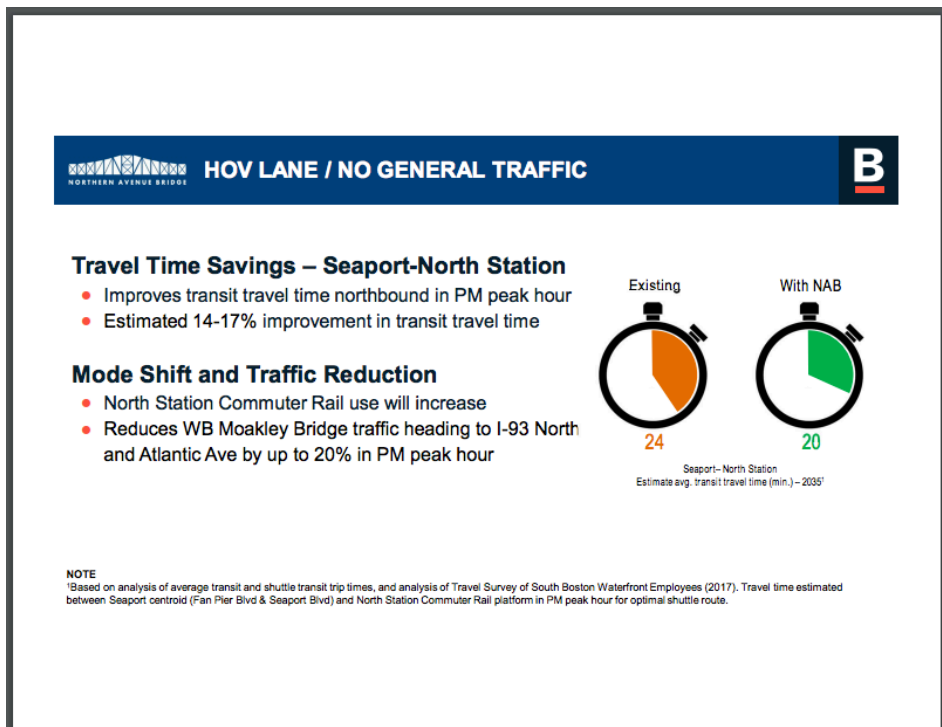
(NOTE: The December 2014 memo predated the 2015 Transportation Plan’s final draft by one month.)

AECOM TRAFFIC STUDY EXCLUDED CONGRESS ST BRT FROM SCOPE

In the summer of 2018, in response to Task Force member requests for data justifying a vehicular lane, COB engineers (AECOM) were tasked with a limited traffic study.

Results of the AECOM study, particularly time savings for private shuttles to North Station, were used to justify a multi-modal design moving forward through Task Force process.

Shuttles would save 4 minutes to North Station.



But the the AECOM study failed to include the impacts of a future Congress Street BRT within the scope of the 2018 traffic study.

This Congress Street BRT, a more practical and efficient means of Seaport – North Station transit, would certainly have impacts on demand for shuttle access to the Northern Avenue Bridge.

The Congress Street BRT concept was known to all parties in 2018. The Congress Street BRT concept is mentioned in the 2015 Transportation Plan.

But shuttle advocates were persistent in winning the lane for their use.

FOUR (4) PRIVATE SHUTTLE PROPONENTS ON TASK FORCE

Four (4) Proponents for private shuttle access were appointed to the Northern Ave Bridge Task Force.



Shuttle Advocates on Task Force

1. Fan Pier master developer Fallon Company representing the Seaport Leadership Group

Seaport Leadership Group members have been the beneficiaries of MCCA-operated private shuttle service since 2015. These “members” of MCCA services have also been the primary beneficiaries of a priority-access Lovejoy Wharf ferry service.

These exclusive beneficiaries include Fan Pier condo owners and Fan Pier employees. (I do not believe Fan Pier service workers were ever provided badges for access to MCCA-operated shuttles.)

Seaport residents outside of Fan Pier have been excluded from accessing shuttle services since 2015.

2. A Better City, private consultant/manager to the Seaport Leadership Group

SEAPORT LEADERSHIP GROUP

A Better City is managing a group called the Seaport Leadership Group (SLG), which is a reorganization of the former "South Boston Business Leaders" working group. In the four months since this group was formed, the SLG is making significant progress to unify the voice of business community in the Seaport area and advance important transportation projects and management for this important economic center. The SLG consists of representatives from 14 businesses located in Boston Seaport area, with the top priorities being implementing recommendations from the 2015 South Boston Waterfront Sustainable Transportation Plan. The SLG made progress on funding, substantial progress on a list of the working groups priorities, and developing an RFP to find an operator of water ferry service from Lovejoy Wharf near North Station to Fan Pier in the South Boston Waterfront. The current plan is to see this pilot water ferry service implemented in the first half of 2018.

3. Seaport TMA, member-based organization

Seaport TMA is a private non-profit working on behalf of members.

Members: <http://seaporttma.org/membership/ourmembers/>

4. MCCA

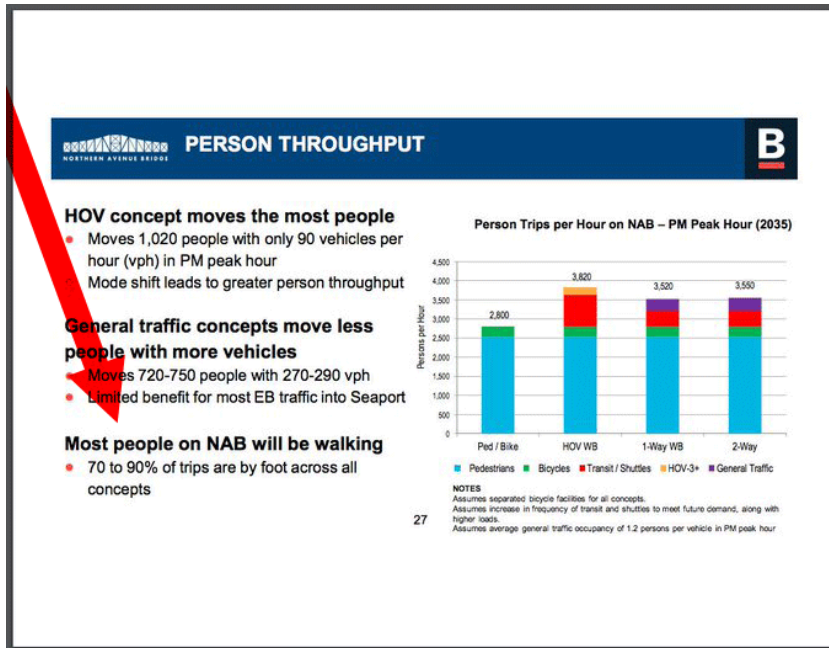
Private shuttle operator, an exclusive service for members of the Seaport Leadership Group since 2015.

Operator of Lovejoy Wharf ferry providing priority access to ~80% of seats at peak hours to Seaport Leadership Group members. 15-20 seats of ~90 seats are available at peak hours to the general public (desktop/smartphone RSVP only).



PEDESTRIAN-ONLY ALTERNATIVE MARGINALIZED THROUGHOUT PROCESS

COB-hired engineers at AECOM found that pedestrian trips would comprise 70-90% of trips across all multi-modal bridge concepts.



Source: October 25, 2018 Task Force presentation

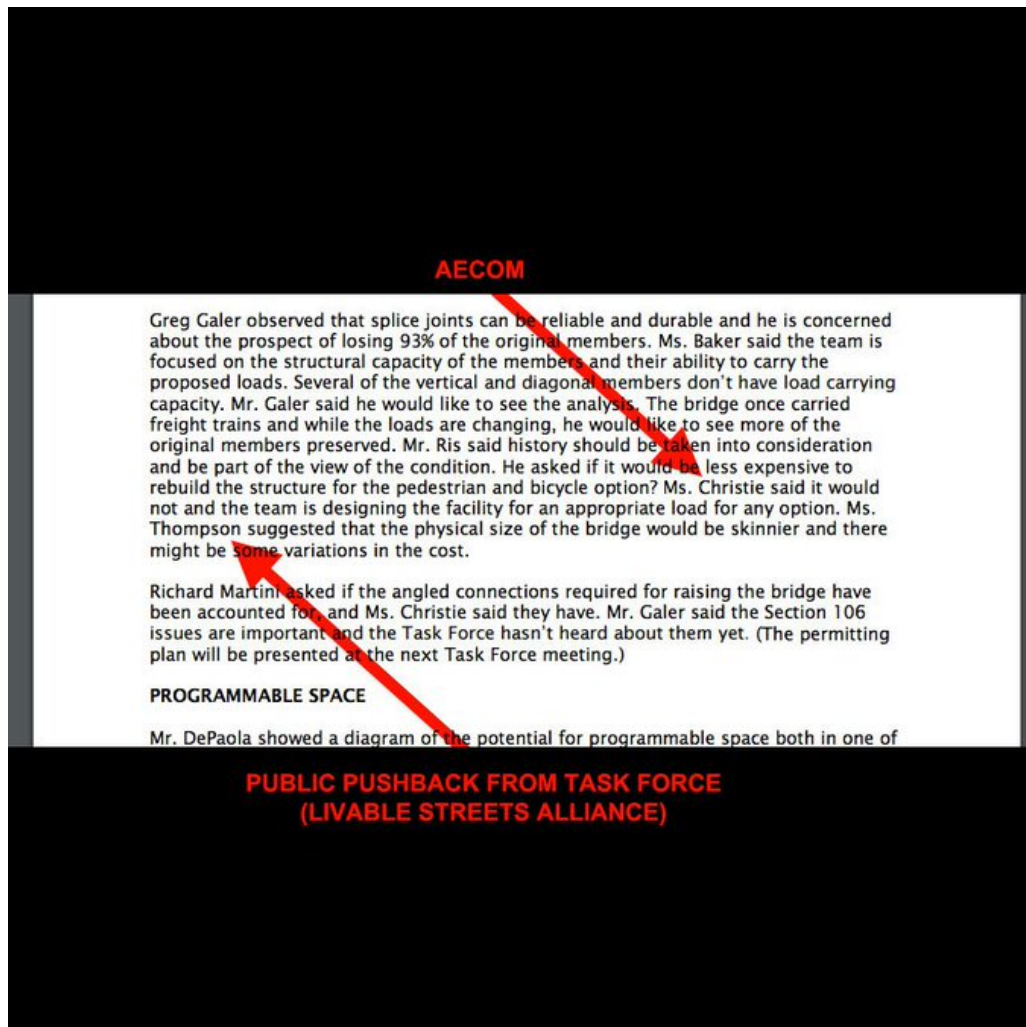
<https://www.northernavebridgebos.com/meetingmaterialsandreports>

Despite that finding, a pedestrian-only alternative was marginalized throughout the process.

For over a year of Task Force meetings, from May 2018 through May 2019, any discussion of a pedestrian-only bridge was predicated on the assumption that a pedestrian bridge would have the same dimensions as a multi-modal bridge.

Because the Task Force chair resisted repeated calls for consideration of a narrower pedestrian-only alternative, the Task Force was informed at a number of meetings that there were no cost savings to a pedestrian-only design.

July 2018: "He asked if it would be less expensive to rebuild the structure for the pedestrian and bicycle option? Ms. Christie [of AECOM] said it would not and the team is designing the facility for an appropriate load for any option."



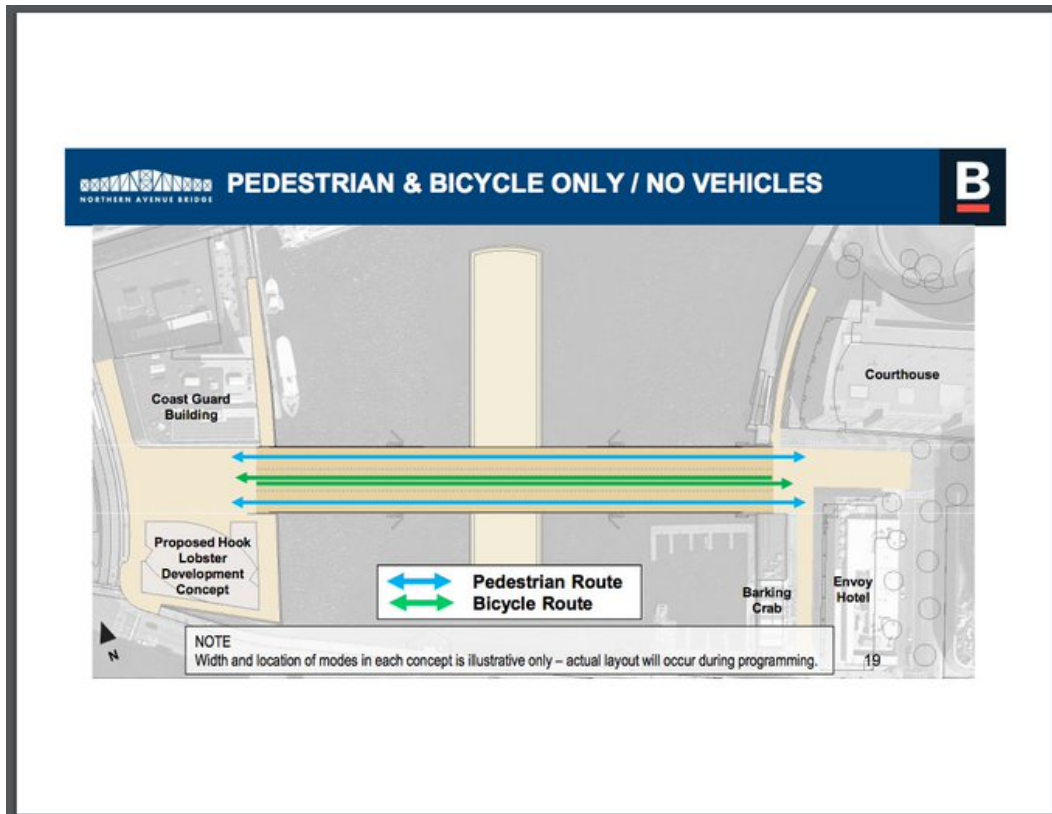
Source: July 26, 2018 Task Force presentation

<https://www.northernavebridgebos.com/meetingmaterialsandreports>

Meeting after meeting, any discussion of a pedestrian-only option was predicated on the design including the full size deck, and therefore requiring the same costs and engineering constraints.

For a year of Task Force meetings, from May 2018 to May 2019, the bridge design concepts moved forward as if desired modes were not a factor in the design or scale of the bridge.

Note the pedestrian alternative presented in October 2018 is the full deck width, not a narrower design:




Source: October 25, 2018 Task Force presentation

<https://www.northernavebridgebos.com/meetingmaterialsandreports>

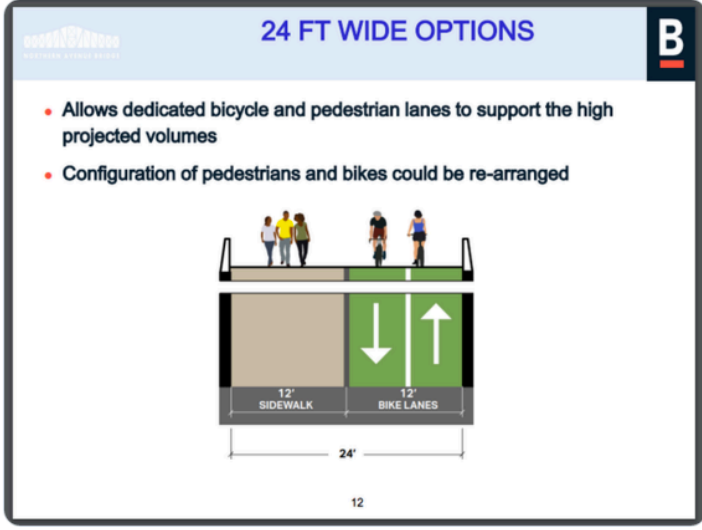
In May 2019, after a year of Task Force meetings, the Task Force considered alternatives including bridges with a narrower deck width.

MAY 2019

 **The Fort Pointer**
@FortPointer

JUST IN: Presentation and notes from 5/23 meeting of Northern Ave Bridge Task Force.

For the first time in a year-long process, the Task Force considered walk/bike bridge options including a narrower deck and associated costs.
northernavebridgebos.com/meetingmaterialia...
H/T @RVA_Boston @PWDBoston



24 FT WIDE OPTIONS

- Allows dedicated bicycle and pedestrian lanes to support the high projected volumes
- Configuration of pedestrians and bikes could be re-arranged

12" SIDEWALK 12" BIKE LANES

24"

12

8:51 AM · May 31, 2019 · [Twitter Web Client](#)

By May 2019, the bridge designer had already been tasked with developing a design for a multi-modal bridge.

PLACEMAKING OPPORTUNITY MARGINALIZED

Early in the Task Force process, it was evident that a truly aspirational opportunity for placemaking would be given short shrift

In the slide show of July 2018, it was asserted that a pedestrian-only design had no noteworthy placemaking advantage over a design with HOV+ support.

EVALUATION SUMMARY						
CONCEPT	MOBILITY GOAL					
	Improves Traffic Operations	Promotes Reliable Transit	Enhances Ped/Bike Connectivity	Reduces SOV	Provides Emergency Vehicle Access	Provides Placemaking Opportunity
One-way Westbound General Traffic	●	●	●	●	●	●
Two-Way General Traffic	●	●	●	●	●	●
HOV+ Lane / No General Traffic	●	●	●	●	●	●
Pedestrian & Bicycle Only	●	●	●	●	●	●
<div>● Concept Fails to Achieve Goal</div> <div>● Concept Achieves Aspects of Goal</div> <div>● Concept Achieves Goal</div>						

Source: July 25, 2018 Task Force presentation


<https://www.northernavebridgebos.com/meetingmaterialsandreports>

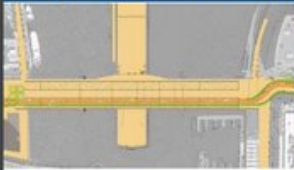
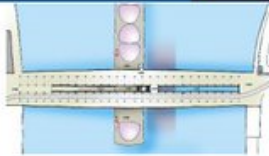
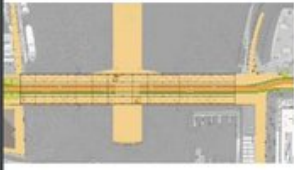
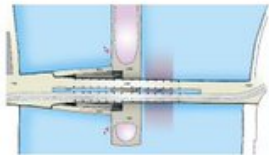
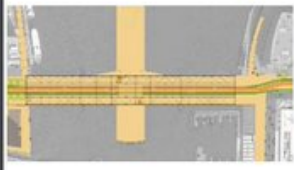
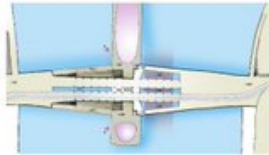
No Task Force meetings were dedicated to the placemaking advantages of a narrower pedestrian-only design, or placemaking advantages of a pedestrian-only design with support for emergency vehicles.

Instead, **every** step of the Task Force process was gamed to produce the desired result: A deck width that would be sufficient to support at least one lane for vehicular transit (see below).

When a narrower deck was finally considered in May 2019, a year into Task Force meetings, the Task Force only focused on the width and cost, not placemaking potential.

3. SENSE OF PLACE – PLACE MAKING COMPARISON OF THE OPTIONS



	Option 1 <ul style="list-style-type: none">• Minimize Structural Change• Maximize Program Space• Central Island is Separated	Option 4 <ul style="list-style-type: none">• Adapting Bridge Structure• Focus on Public Space• Direct Connection to Central Island	
	Option 2 <ul style="list-style-type: none">• Minimize Structural Change• Focus on Connectivity• Separation of Transport Modes• Central Island is Separated	Option 5 <ul style="list-style-type: none">• Adapting Bridge Structure• Maintain Central Section Only• Expanding Public Space• Integrating Central Island	
	Option 3 <ul style="list-style-type: none">• Adapting Bridge Structure• Central Transportation Corridor• Creating a City Street• Central Island is Separated	Option 6 – A Variation of Option 5 <ul style="list-style-type: none">• Adapting Bridge Structure• Maintain Central Section Only• Expand Public Space on Both Sides• Integrate Central Island	

PLACEMAKING OPPORTUNITY MARGINALIZED (continued)

Currently Proposed Design

Contrary to “People First” marketing by the Proponent, pedestrians on the Promenade and lower deck will have compromised views of the watersheet and will be subjected to emissions and noise from vehicles idling on lane(s) above.

The Proponent asserts that pedestrians will enjoy recreating below lane(s) of vehicular traffic. No impact study has been performed to support these assertions.

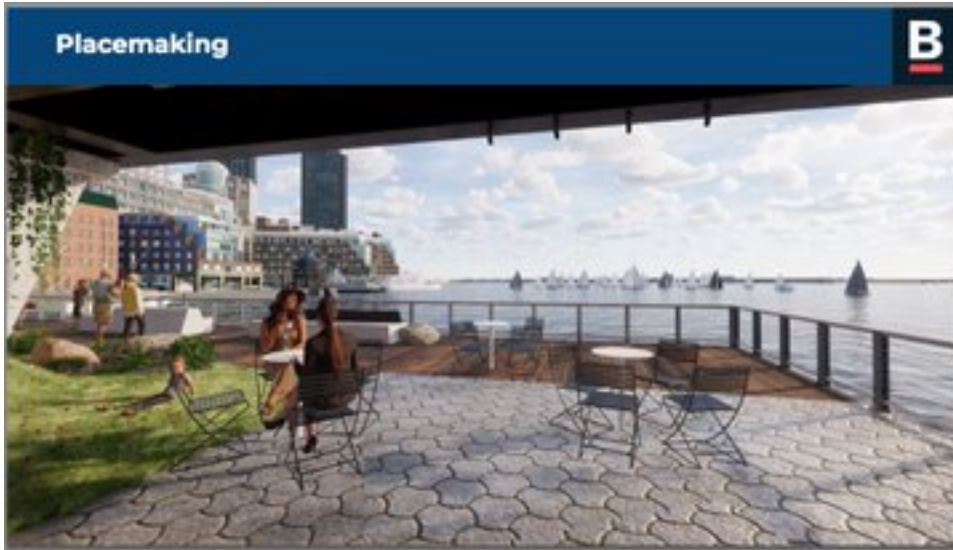


Source: Public Presentation, May 6, 2020

<https://www.northernavebridgebos.com/meetingmaterialsandreports>

In addition to pedestrian transit, the Proponent claims that visitors will enjoy passive recreation below lane(s) of vehicular traffic.

No impact study has been performed to support these assertions regarding recreation under vehicular lane(s).



SUMMARY: PROCESS HAS BEEN AGENDA-DRIVEN, NOT DATA-DRIVEN

No multi-modal concept has been justified in data:

- No *reasonably* scoped traffic study was conducted
- Misassumptions regarding cost of alternatives including the cost of a pedestrian-only design clouded a year of Task Force meetings
- Four (4) private shuttle Proponents steering the public process, including the Task Force chair, had a lengthy track record of advocacy for publicly-subsidized services available exclusively to “members”
- To date, no public transit plan visioning use of the vehicular lane (including viable interfaces at Atlantic Avenue beyond a stop sign) has been produced by the City of Boston or MBTA despite repeated requests

A pedestrian-only alternative has not been sufficiently studied:

- Cost savings of exceeding 50% of the proposed bridge (AECOM data)
- Manage 70-90% of trips projected for COB's bridge (AECOM data)
- Co-exist with support for emergency vehicles (AECOM DATA)
- Provide emergency redundancy, a need cited by COB a year into Task Force meetings



In summary, I'm requesting that MEPA consider requiring more information from the Proponent.

The Proponent has not adequately considered environmental impacts including but not limited to traffic congestion, emissions, noise impacts and subpar interfaces between pedestrians and vehicular infrastructure, interfaces with four (4) Harborwalk connections and generally, interactions between vehicles and pedestrians/cyclists.

Thanks for your consideration of my comments.

Regards,

Steve Hollinger
Fort Point / Seaport Resident
21 Wormwood St #215
Boston, MA 02210
steve@sjh.com
617 338-2222

NOTE FOR HISTORIANS

A permanent archive of Northern Ave Bridge planning documents, applications, decisions and public comments is being constructed by this commenter at <http://www.northernavebridge.com>.

The website will be activated within a few months of this comment letter.

41 Osborne Road
Brookline MA 02210
June 11, 2020

Kathleen A. Theoharides, Secretary of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Attn: Alex Strysky, MEPA Unit

Chris Osgood, Chief of Streets
Public Works Department
Boston City Hall
Boston, MA 02201
Attn: Para Jayasinghe, City Engineer

Re: MEPA Project 16194
Northern Avenue Bridge Replacement Project

Dear Secretary Theoharides and Chief Osgood:

I have been a member of the Save the Northern Avenue Bridge Committee since its inception. I work at the U.S. Courthouse adjacent to the Bridge and crossed the bridge twice a day for a number of years. Crossing the Bridge was a great treasure for all pedestrians, as well as bicyclists. The new design currently proposed by the City will not provide the comfort and pleasure that the Bridge provided and the new design should not be accepted.

The new design does not adequately preserve the Bridge. The historic Bridge should be preserved as much as is possible, for its value in preserving Boston's history and its enduring value as a charming and interesting landmark adjacent to the new glass and steel Seaport District, for the feeling of happiness and protection that it provided to users, a place where people brought their friends, took photographs, felt a sense of comfort and relief, increased the spring of their steps, and, sometimes, danced. The new design does not appear to provide these qualities.

The two story design is unlikely to be valuable to pedestrians, for whom it was, presumably, designed. The two-story design adds greatly to the cost of the new bridge but in all likelihood the proposed lower story would be uncomfortable, feel isolated and possibly unsafe, and would be only lightly used. Should motor vehicles use the Bridge, pedestrians using the lower level would inhale the exhaust of the vehicles. It is suggested that if seating on the new bridge is important, the seating should be located on the level used by pedestrians and bicyclists crossing the bridge (Seating seems unimportant on this bridge, to me; the important thing is the journey).

The width of the bridge in the new design is totally outsized and is part of what makes the design seem cold and inhospitable. The design appears to anticipate regular motor vehicle traffic over the bridge, which would destroy the special aesthetic and safety qualities that pedestrians and bicyclists enjoyed and appreciated when the bridge was open and would fly in the face of the many lovers and advocates of the old Bridge.

As the Boston Preservation Alliance and the Save the Northern Avenue Bridge Committee has suggested over the years, Silman Engineering, the architects for the High Line, should be contracted to plan the Bridge to incorporate as much of the historic design as possible in a cost-effective way, preserving the bridge's charming character and historicity (while, of course, accommodating the need to raise the bridge). Engagement of this firm has been recommended numerous times, and the City has spoken on a number of occasions about doing so but has yet to take the step. The firm appreciates the value of preserving and re-using old structures in enriching and enhancing city life.

Finally, the current design appears to be perched to ruin the beautiful, highly utilized pedestrian walkway and table area between the Barking Crab and the Envoy Hotel, which should be unacceptable.

Thank you for your consideration,

Yours truly,

/s/ Anita Johnson

ANITA JOHNSON

ajohnson02210@yahoo.com

617-734-0711

● TODD LEE, FAIA, LEED-AP - ARCHITECT

May 21, 2020

Team@NorthernAveBridgeBos.com and
EEA# 16194 – alexander.stryisky@mass.gov

Re: COMMENT - Northern Avenue Bridge Replacement Project -
Vehicular and Pedestrian Use / Lighting - City of Boston presentation of May 6, 2020

I am an abutter (resident at 85 East India Row), an interested design professional (FAIA, former chair of the BSA Urban Design Committee), and President of LIGHT Boston, frequently working with the City on good lighting for our nighttime environment. I first studied the urban design impact of the Old Northern Avenue Bridge under a BRA contract in 1987. More recently, I led the Light Boston team that co-sponsored the lighting celebration of that bridge for DPW in 2013

The currently proposed design has many fine aspects. The new truss sculpture is an elegant recall of the original structure, while responding to the reality of higher tides. The main feature of the rotation mechanism display tells the unique story of this exemplary engineering solution well. The pedestrian and bicycle experiences present exciting bridging opportunities and a valuable new waterfront attraction. The potential for two lanes of vehicle traffic when needed to supplement the inevitable Moakley Bridge repairs, as well as current emergency vehicles, responds to the imperative for increased vehicular access to South Boston. But the current design places the two essential purposes – pedestrian and vehicular – directly at odds with one another in a zero-sum struggle. As the crossing is currently imagined, it appears that one side must “lose” while the other “wins”. This will leave the City with at least one disappointed, disillusioned, intractable and angry constituency.

I propose a compromise in which the spirit of the new bridge design is kept, but by which each need can be met with the certain knowledge that the other cannot become dominant in the future. To let us think in a new way, let’s separate the two sides of the bridge into two different and independent purposes. In general, let the south (upstream) section be designed to be purely vehicular, and pretty much designated for that. Let the northern (downstream, harbor) span be built for a purely pedestrian (and sometimes bicycles) experience with amenities, and at reduced cost. Both sides win!

As to the lighting of the new bridge, what has been designed is elegant in its simplicity, and poetic in its delicacy. But it is static. It does not move. I suggest that the element of movement – that magical and almost unbelievable period when the old bridge was swinging, hanging out over the water moving majestically into the open position, will be lost from memory. Could imaginative lighting re-create the illusion of the dramatic sweep of that engineering marvel? Of course. LIGHT Boston is ready to go to work immediately again with the City on this bridge to capture such a remarkable destination effect.

What a wealth of wonderful opportunities there are for the City to satisfy all interests with a truly multi-purpose crossing! Press on! It’s a noble endeavor.

Best wishes. Sincerely yours,



Kathleen A. Theoharides
Secretary, Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge St., Suite 900,
Boston, MA 02114

June 9, 2020

Dear Secretary Theoharides,

I am writing to express our support regarding the proposed plan for the renovation of the Northern Avenue Bridge. As you are aware, the current plan calls for a bridge with pedestrian and bicycle facilities and a single lane for public transit that calls for potentially 110 bus trips per day. While we had advocated for the plan to include a lane on the bridge for personal vehicle traffic, we understand the city's need to balance the modes of transportation travelling over the bridge with the width of the bridge, and how that impacts its connection to land on either end.

While the overall project area for the new bridge will be larger than the current footprint, these small increases are necessary to meet future sea level rise expectations while still maintaining the same navigable channel that exists today. These impacts should be minimal, especially when the myriad benefits of the bridge are considered. Dedicated pedestrian and bicycle facilities will make all modes of transportation safer on the streets of Boston, not only for pedestrians and cyclists, but also for vehicles currently competing for limited space on proximate streets.

It is our hope and expectation that the public transit lane will be active and reduce overall congestion. The added lower deck and waterfront access are also a great aesthetic addition to the project. As a convention center, we welcome attendees from all parts of the country and the world, and the ability to provide an improved local amenity that also serves as a new gateway to downtown Boston will be well received.

Regards,

David Gibbons

Executive Director
Massachusetts Convention Center Authority



The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

June 9, 2020

Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900 (9th floor)
Boston, MA 02114

ATTN: Alex Strysky, MEPA Office

RE: Northern Avenue Bridge, Fort Point Channel, Boston, MA; MHC# RC.2913; EEA# 16194

Dear Secretary Theoharides:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the Environmental Notification Form (ENF) submitted for the Northern Avenue Bridge Replacement Project and have the following comments.

The proposed project includes the demolition of the historic pivot swing bridge, three granite and concrete side span piers, and the Bridge Tender's House. The proposed project also includes the removal of the existing timber piles within the draw fender pier and draw fender pier over which the swing span sits when in the open position. The central swing pier is proposed to be retained. A new bridge is proposed to replace the historic Northern Avenue Bridge. As part of the new bridge, the following are proposed: construction of new piers, construction of the new bridge superstructure, replacement of the western bridge abutment and reconstruction of the eastern bridge abutment, construction of the promenade, and a construction of approaches to the bridge to accommodate the bridge profile and to make connections to the harbor walk.

The Northern Avenue Bridge is listed in the State Register of Historic Places and was formally determined eligible for listing in the National Register of Historic Places by the Keeper of the National Register. The Fort Point Channel, the Northern Avenue Bridge, the Northern Avenue 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 Northern Avenue Bridge, completed in 1908, is significant as one of only two triple-barreled swing bridges in the Massachusetts Highway Department's statewide bridge inventory. The bridge is also significant for its role in the commercial development of South Boston. Additional information including Historic American Engineering Record (HAER) documentation can be accessed via the MHC website at: <http://mhc-macris.net/Details.aspx?MhcId=BOS.9000>

The ENF does not identify any State permits in Attachment 4, which only lists Federal and Municipal permits. The MHC requests that all State permits be disclosed.

The MHC also requests that the proponent list all State and Federal funding sources. The copy of the Project Notification Form (PNF) and associated attachments presented in Attachment 5 of the ENF references Federal funding.

The ENF does not discuss any potential impact to the Fort Point Channel Seawalls as part of this project. The ENF also does not discuss in detail the work to be completed on the central swing pier or identify all of the salvaged components and their treatment prior to installation on the new bridge.

If an Environmental Impact Report (EIR) is required, the MHC requests that the scope includes MHC's requests for information above.

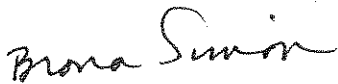
The project requires federal permits from the Army Corps of Engineers (ACE) and the United States Coast Guard (USCG) and therefore subject to federal review under Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800).

Additionally, The Northern Avenue Bridge has previously been subject to Section 106 review as part of a 1989 project that constructed a new bridge next to the Northern Avenue Bridge. The lead federal agency for the 1989 project was the Federal Highway Administration (FHWA). The "conditional no adverse effect" finding made by FHWA in 1989 required that a Preservation Plan be developed for the Northern Avenue Bridge. The PNF in Attachment 5 lists FHWA as a source of funding for this project.

The MHC looks forward to the lead federal agency's finding of effect and initiation of the Section 106 process.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800) and MEPA (301 CMR 11). Please do not hesitate to contact Elizabeth Sherva of my staff if you have any questions.

Sincerely,



Brona Simon
State Historic Preservation Officer
Executive Director
Massachusetts Historical Commission

xc: Jeff McEwen, FHWA
John McVann, FHWA
Captain B.L. Black, USCG
James Rousseau, USCG
Ruthann Brien, Army Corps of Engineers New England Division
Tammy Turley, Army Corps of Engineers New England Division
Brenda Newman, Army Corps of Engineers New England Division
John Eddins, ACHP
Mandy Ranslow, ACHP
Chris Osgood, City of Boston
Eric Worrall, DEP NERO
Steve Lipman, DEP
Ben Lynch, DEP
Jeffrey Shrimpton, MADOT
Robert Boeri, CZM
Lisa Engler, CZM
Melissa Ryan, AECOM
Rosanne Foley, Boston Landmarks Commission
Greg Galer, Boston Preservation Alliance
Michael Creasey, National Park Service
Elizabeth Merritt, National Trust for Historic Preservation
Michael Tyrrell, Friends of the Northern Avenue Bridge
Paul Farrell, Friends of the Northern Avenue Bridge
Stacey Beuttell, Walk Boston
Jack Glassman, BSA Historic Resources Committee
Carol Chirico, GSA
Judge Douglas Woodcock, Moakely Courthouse
Rachel Borgattis, Friends of Fort Point Channel
Lauren Grymek, Seaport TMA
Todd Lee, Light Boston
Sara McCammond, Fort Point Channel Neighborhood Association
Stacey Thompson, Livable Streets
Becca Wolfson, Boston Cyclists Union

From: [Carol Chirico - LD1](#)
To: [Strycky, Alexander \(EEA\)](#); [Kim, Tori \(EEA\)](#)
Subject: Northern Avenue Bridge Replacement Project EEA # 16194
Date: Tuesday, June 9, 2020 4:45:27 PM

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Dear Ms. Kim and Mr. Strycky,

The United States General Services Administration (GSA) has had the opportunity to review the Environmental Notification Form for the Northern Avenue Bridge Replacement Project, EEA #16194 (Project). GSA owns and operates two Federal buildings adjacent to the Northern Avenue Bridge: the John Foster Williams Coast Guard Building at 408 Atlantic Avenue (Coast Guard Building) and the John Joseph Moakley U.S. Courthouse at 1 Courthouse Way (Moakley Courthouse), together, the “Federal Buildings”.

GSA does not have any comments directed to the three MEPA Review Thresholds analyzed in the ENF (waterways, coastal banks and historic preservation), however GSA would like to go on the record stating that it is concerned with both short and long-term impacts of the Project on the Federal Buildings, and believes that the ENF does not address these concerns in any way. GSA notes that the ENF form states that the *“the project description should summarize both the project’s direct and indirect impacts (including construction period impacts) in terms of their magnitude, geographic extent, duration and frequency, and reversibility, as applicable.”* We do not see any meaningful analysis or discussion of direct and indirect impacts on abutting properties in the ENF.

Specifically, GSA has four concerns related to the Project. They are:

1.
impacts on the Federal Buildings, including security and pedestrian safety issues, during and after construction of the Project;
2.
impacts of queuing busses and other vehicles using the Northern Avenue Bridge in front of the Federal Buildings;
3.
short and long-term impacts to the government’s ability to access the service and delivery bays of the Coast Guard Building as a result of new traffic patterns and the new approach required to connect the elevated bridge to Atlantic Avenue;
4.
lack of information about and analysis of the intersection between the Harborwalk at the Moakley Courthouse and the raised bridge approach on Northern Avenue

While the ENF states that the Project will not meet or exceed any review thresholds related to traffic, GSA requests more information and analysis regarding how the intersection with Northern Avenue and Atlantic Avenue will be managed during construction and after completion of the Project as a

result of the addition of 110 private shuttle trips per day. The ENF provides no discussion pertaining to the impact of this traffic once these shuttle busses leave the Bridge, nor does it explain how vehicles attempting to access the Coast Guard Building will interact with oncoming shuttle bus, bicycle and pedestrian traffic. With regard to the fourth concerns, the ENF states that the final phase of the project will be the “configuration of the approaches to the bridge to accommodate the bridge profile and to make connections to the harbor wall” (ENF, p. 8). GSA would like to see more discussion and analysis on how the new raised bridge approaches will impact the Moakley Courthouse and Harborwalk.

While the Commonwealth's MEPA process may or may not be the appropriate vehicle to identify, analyze and suggest mitigation for the four concerns identified above, the GSA requests that these issues be fully vetted and that opportunities to discuss and address these impacts be made available. GSA looks forward to continued discussions with the City of Boston to address impacts on the Coast Guard Building and the Moakley Courthouse.

Finally, as a direct abutter to the Project, GSA requests that it be added to the ENF Distribution List on Exhibit 3, and that all future notices or filings pertaining to this project be directed to carol.chirico@gsa.gov.

Sincerely,

Carol Chirico

--

Carol Chirico
Assistant Regional Counsel
New England Region
General Services Administration
10 Causeway Street, Room 1090
Boston, MA 02222
Desk Phone: (617) 565-5890
Cell: (617) 851-4713

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From: [Amy Walsh](#)
To: [Strycky, Alexander \(EEA\)](#)
Cc: comments@walkboston.org
Subject: Northern Avenue Bridge
Date: Monday, June 8, 2020 9:07:19 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning Alex,

I would like to see a People First Northern Avenue Bridge. There are so few places in Boston that are truly people first and as a resident of the city, I would like and need to see more. How do we encourage walking and biking in the city if it is not safe to do so? I urge the consideration of this proposal to put people first. An argument I never thought we would need to make!

Thank you,
Amy

--



Amy Walsh, M.Sc., CDP (pronouns
she/her/hers)

Dementia Friendly Boston

Age Strong Commission

City of Boston | City Hall Room 271

617.635.0947(w) | www.boston.gov/agestrong



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June 9, 2020

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:

On behalf of Seaport TMA, I am pleased to provide the following comments regarding the City of Boston's Environmental Notification Form for the Northern Avenue Bridge Replacement Project. As a member of the Northern Avenue Bridge Mayoral Advisory Task Force, we have had the opportunity to participate in twelve Task Force meetings, three public meetings, and numerous additional meetings and conversations with local stakeholders. The comments below have been shaped by the robust discussion that occurred during the planning process for the Bridge, the design presented at the May 6 community meeting, and our review of the ENF.

Seaport TMA is the South Boston Waterfront's Transportation Management Association. Our membership-based organization represents over fifty-five employers, developers, and cultural institutions in the South Boston Waterfront and Fort Point neighborhood. The TMA offers transportation programs to employers and commuters and advocates for transportation projects and policies to help keep the Seaport moving and thriving as an extraordinary place to live, work, play, and visit. Given that our primary mission is to improve transportation options and mobility in the Seaport, we have devoted a considerable amount of time to evaluating how the new Northern Avenue Bridge can best serve the mobility needs of the South Boston Waterfront, both now and for generations to come.

The project as proposed in the City's ENF reflect the stated design goals for the bridge: to improve mobility, honor history, strengthen resiliency, and to create a destination. While all four of these goals are critical to creating a new bridge that represents the aspirations of our community, our primary focus through this process has been how the new bridge will serve the mobility needs of the Seaport today and for the next seventy-five years.

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We strongly support a bridge deck design that responds to the multi-modal needs of the Seaport today and anticipates the future mobility needs of the District. This means prioritizing protected space for walking, protected space for cycling, a dedicated bus lane, and a bridge deck that offers enough width to provide flexibility to accommodate both the growth of the District and the mobility options that the City may want the bridge to support in the future. Additionally, we support a bridge design that makes space for emergency vehicles to traverse the bridge to respond to emergency situations at the John Joseph Moakley Courthouse, on the water sheet below the bridge, or at other locations in the Seaport adjacent to the bridge. We look forward to seeing improvements to the design of the approaches on both ends of the bridge that will reduce potential conflicts between cyclists, pedestrians, and transit vehicles.

As we look back at the development of the South Boston Waterfront over the past 30 years and look ahead to the additional development that will occur in the future, we feel strongly that the design of the new Northern Avenue Bridge should be engineered in anticipation of the tens of thousands of new residents and jobs that will arrive in this still-burgeoning neighborhood.

. According to *Go Boston 2030*, By 2030, the Seaport is projected to gain:

- 13,000 new jobs;
- Close to 10 million new square feet of commercial development;
- The redevelopment of existing commercial space and the potential expansion of the Boston Convention and Exhibition Center;
- Over 1,500 new hotel rooms;
- New housing construction that will bring thousands of new residents to the District.

Further, the *South Boston Waterfront Sustainable Transportation Plan* estimates that over the next two decades another 17 million square feet of development is underway or planned, and that by 2035, total person-trips within the Waterfront area are projected to grow by 63 percent. This area is one of the fastest growing job centers in Massachusetts, and the demand for transportation services to this area will continue to increase.

One of the clear and unanimous goals that the Mayoral Advisory Task Force has agreed upon is that we support the construction of a bridge that will last for 75-100 years. If that's the case, then we need to consider the future mobility needs of the District – those that we understand today and those that we can't yet account for in the future. It's hard to predict what the mobility needs of the Seaport will be in 25, 50, or 70 years. Designing

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the bridge with a transit lane will offer the capacity and flexibility we need to account for the future transit needs of the South Boston Waterfront. Dedicated transit infrastructure on major corridors throughout the Waterfront is among the most important steps we can take to reduce single-occupancy vehicle traffic while improving mobility options for all who visit, work in, or live in the neighborhood.

We greatly appreciate the City of Boston's commitment to rebuilding the Northern Avenue Bridge and the effort that has been put into this very robust multi-year planning process. We support the City's ENF and look forward to this new landmark gateway to the South Boston Waterfront.

Sincerely,



Patrick Sullivan
Executive Director, Seaport TMA

June 9, 2020

Kathleen A. Theoharides, Secretary of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Attn: Alex Strysky, MEPA Unit

Chris Osgood, Chief of Streets
Public Works Department
Boston City Hall
Boston, MA 02201
Attn: Para Jayasinghe, City Engineer

Re: MEPA Project 16194
Northern Avenue Bridge Replacement Project

Dear Secretary Theoharides and Chief Osgood:

We are writing to provide comments on the ENF for the Northern Avenue Bridge (NAB) Replacement Project. This is a project with a 30-year history which has included many internal City deliberations as well as many public processes, both within and outside those managed by the City. While we are pleased that the City is now seeking to bring the project planning to closure, we strongly disagree with the City's choice of a bridge design that includes regular vehicle use that impinges on the use and safety of the bridge by people walking and biking, and does not provide the traffic benefit that the City says is the reason for including buses on the bridge.

While the design includes substantial space for use by pedestrians, much of that space would not be built until the unfunded and unscheduled Phases 2 and 3 of the project are built. Bicycles are relegated to shared lanes with buses. The lack of clarity about how pedestrians, bikes and buses will circulate raise many safety and operational concerns.

The scale and cost of the bridge has grown enormously simply to accommodate 110 shuttle buses/day. In addition to the lack of transportation efficacy and the design problems discussed below, we believe that the project is simply too big and too expensive. A smaller bridge that serves people walking and biking, and provides access for emergency vehicles, could provide the benefits and urban enhancements that both the public and the City desire.

While the loss of the Old Northern Avenue Bridge and the design of a new Northern Avenue Bridge raise many historic and contextual design issues, we are confident that the comments of our fellow advocates with specific historical and urban design expertise will speak to those issues, and we leave that task to those able commenters.

Our comments are organized as follows:

1. Decision regarding the modes to be served by the bridge
2. Funding and budget for the project
3. Walking and biking designs as described in the ENF
4. Public process

Decision regarding the modes to be served by the bridge

The City has determined that the bridge will carry pedestrians, bicycles, emergency vehicles and “transit”, which has never been clearly defined by the city, but thus far seems to include private buses and shuttles utilized by businesses located in the Seaport District. . We believe that the decision to serve these private vehicles is the wrong choice, and that this wrong choice has in turn led to a wide variety of problems with the selected alternative.

- Will the inclusion of a bus lane on the bridge provide transportation benefits to the public?

There has been widespread and consistent public support for pedestrian, bicycle and emergency vehicle access. It is worth noting that of the online public comments regarding the project, 68% of the respondents preferred a bike/ped/emergency bridge option and only 1 person called for allowing general traffic on the bridge. The remaining 31% of comments didn’t reference a mobility preference.

- Will the inclusion of a bus lane reduce congestion?

As the City has stated in the ENF (page 6) “... *the intent of the project is (to) re-open the bridge for public enjoyment, provide additional means of pedestrian access across Fort Point Channel, provide a dedicated bus lane to reduce traffic congestion in Downtown Boston, and provide an alternate route for emergency vehicles if the need arises.*” This statement of purpose seems to be the City’s justification for selecting a large and very expensive bridge rather than a smaller and less expensive alternative, that serves only pedestrians, bicycles and emergency vehicles. However, the transportation analysis provided by the City’s consultants - AECOM Memo: Northern Avenue Bridge Reconstruction - Mobility Analysis (November 13, 2018) makes the following conclusion: (P 16) *“The overall level of service for all study area intersections remains consistent between the No Build and all concepts analyzed in 2035 PM peak hour as previously shown on Table 5. The intersections of Seaport Boulevard and Atlantic Avenue and Seaport Boulevard and Purchase Street continue to operate at LOS “F”, and would remain congested under all concepts analyzed.”*

Thus, the City’s own transportation analysis concluded that putting buses on the bridge does not reduce congestion.

Having been closed to vehicular traffic since 1997, the downtown Boston side of the NAB ends at a one-way roadway lacking direct access to the entrance of I-93, completed as part of the central artery in Big Dig which opened up many years later. Thus, the utility for vehicular traffic traveling from the Seaport into downtown will be extremely limited and cause further disruption in travel demand due to congestion and redundancy (forced increase in VMT from driving around the block to get to the entrance). Therefore, having motorized vehicle traffic travel from and utilize the NAB will not fit into the existing fabric of the street network.

When asked about this mismatch between the stated purpose for the project and the lack of efficacy shown by the data during the MEPA “Site Visit” call, City Engineer Para Jaysinghe suggested that the City was planning for “unknown volumes” for the next 75 years. The standard practice for transportation studies is to use the time frames actually evaluated (2035).

- Is the inclusion of a bus lane on the bridge a reasonable financial decision?

The ENF states that the bridge would carry 110 buses/day (at a generous occupancy factor of 25 people/bus this equals 2,750 people/day). The very wide bridge now proposed at a cost of \$100 million (for Phase 1, Phases 2 and 3 have not yet been costed out) is at least twice as costly as a bridge that

could very comfortably accommodate walkers, cyclists and emergency vehicles. As stated in City presentation from the Mobility and Traffic Evaluation Workshop: *"Most people on NAB will be walking; 70 to 90% of trips are by foot across all concepts."*

- Will any public transit make use of the bus lane?

There has been no indication that any MBTA public buses will use the bridge, and the MBTA's study of improvements to its bus networks and routes does not include any use of a Northern Avenue bus lane. Thus, as we understand it today, a bus lane on the NAB would only serve private shuttle buses serving employees in the Seaport District. Over the years many advocates for better bus service have urged the MBTA and the City to look at the feasibility of an exclusive Congress Street bus lane from South Boston to North Station - a route that could provide significantly more direct and efficient service for both MBTA and private shuttles. We do not believe that this bridge should be built to accommodate buses unless the MBTA and the City can demonstrate that there is a clear benefit to public transit, and the MBTA identifies which specific routes will run over the bridge when it has been completed.

We urge the City to select a design to accommodate walking, biking and emergency vehicles and to delete accommodation of other vehicles.

Funding and budget for the project

- How much will the bridge cost?

The cost information provided at the June 3, 2019 community meeting showed a range in cost from a "basic" 12-foot wide bridge for \$40 million to a "contextual" 56-foot wide bridge for \$110 million. The contextual bridge now being proposed is more than 100-feet wide (at the center of the span) and thus could be guesstimated to cost well in excess of \$150 million for Phase 1. The public needs to be informed about the actual estimated cost of Phases 1, 2 and 3 of the entire bridge.

- How will the bridge be funded?

Appendix C of the Massachusetts Historical Commission PNF (included as Attachment 5 to the ENF) provides a funding summary that shows \$46m in City funding; \$10m in Federal funding; and \$2m in private funding - for a total of \$58m in allocated funding. This would seem to indicate a gap in sufficient funding for the bridge in the range of 50-\$100m for Phase 1 of the project. The City needs to disclose its funding plan for all phases of the project to prove the feasibility of the design that has been shared with the public.

- Is this the moment in time to spend a lot of money on this project?

The combined Federal and private funds for the bridge comprise less than 10% of the overall cost of the bridge as it is currently designed. This means that the City will need to contribute significant funds to complete even the first phase of the bridge at a point of great economic uncertainty locally and globally. There is significant risk that the City will be unable to finance the completion of the bridge through Phase 3. Additionally, the City already has enough dedicated funds, \$46m, to build a basic 12 ft bridge as described at the June 2019 NAB Task Force meeting (see above).

Walking and biking designs as described in the ENF

As laid out above, we strongly disagree with the City's choice of a design alternative that includes vehicle use (other than emergency vehicles) on the bridge. However, we feel compelled to also comment on the specific design of the bridge as shown in the ENF because it has so many problematic design features for

people walking and biking. While we understand that the designs are not expected to be complete at this point in the project, the lack of attention to simple operational and safety questions raises doubts about the project design. If the City continues to pursue this preferred alternative we request that each of the design issues raised below be answered in the response to comments on this ENF. In addition, we recommend designing any bikeway and pedestrian facility using the [NACTO](#), Boston [Complete Streets](#), [MassDOT](#), and [FHWA](#) design standards to have a low level of traffic stress (LTS by Furth) and high level of local access (by MAPC) rating.

1. The pedestrian//bike/bus interaction at the Seaport side of the bridge seems to show the bus lane taking up the entire entrance area onto the bridge with a pedestrian ramp entering directly into the bus lane. All of the pedestrian access onto and off the bridge is in the area shown as a bus lane. How will this area be designed to ensure the safety of people walking and biking? The plan shows shuttle buses directly adjacent to people walking/biking; paint is not an appropriate or safe separation or protection for pedestrians and cyclists on a new bridge.
2. On the downtown side of the bridge the buses would cross the heavily traveled Atlantic Avenue sidewalk into the congested Atlantic Avenue vehicular traffic without a traffic signal to provide them with a break in traffic. How will bus movement be managed to ensure that the buses do not inch up to the travel lane and block the sidewalk while waiting to turn right onto Atlantic Avenue?
3. How will pedestrian connections between the new bridge and the Harborwalk be designed on both sides of the Channel and how will the connection on the Seaport side of the bridge impact the operations and attractiveness of the Barking Crab restaurant and the Envoy Hotel? The new bridge is itself planned to be a new part of the Harborwalk, but these connections which have complicated vertical and alignment design challenges have not been described in the ENF. Specifically, how does the bridge gain enough height to pass over the water 8' higher than it is now? Is there a long ramp from Northern Avenue near the courthouse? Is that ramp steep enough to affect walkers trying to use it? Does the existing Harborwalk at the Courthouse connect under the new bridge to the part of the Harborwalk that parallels the Fort Point Channel? Will the new bridge allow this connection?
4. On the downtown side of the bridge, it appears that service access to the Coast Guard Building and the Hook Lobster site are to be provided through the pedestrian, bike and bus zones of the bridge. How would this work? Would service vehicles (or any other vehicles) be allowed to turn right from Atlantic Ave into the bus lane and pedestrian zone?
5. Bus/Bike Lane - The functionality of bus/bike lanes prioritizes bus travel, but do provide some safety benefits for bikes in places where buses were already operating in the roadway space and the only other option bikes have is to ride in dangerous, high speed vehicular traffic. For example, after the bus/bike project was implemented on Washington St, bikes now have the option of riding in a less congested space, which they share with buses, hence reducing the potential for conflicts and ultimately crashes. While the bus/bike lane provides some protection, we feel that it is not enough for the following reasons:
 - a. Since the Northern Ave Bridge has not allowed vehicles for many years and it is being designed from scratch, adding an additional layer of bus traffic (transit) without proper space for segregation for bikes and pedestrians only increases the exposure to conflict and risk.
 - b. In a 12' bus/bike lane, buses will travel at a much greater speed than cyclists and will want to overtake cyclists, which becomes stressful and can cause potential conflicts. The cyclist is forced to rely on the decision-making of bus drivers behind them. The cyclist is also usually traveling slower, causing the bus driver to reduce their speed and accept the delay from being "stuck" behind the cyclist. This conflict may cause aggressive behavior, which can promote overtaking movements due to impatience from the delay.

- c. The ENF states there the number of vehicle trips per day will be 110 bus trips (potential for occasional emergency vehicles). Within a 12-hour period, for example from 8 AM – 8 PM, frequency will be approximately 10 buses per hour, or 1 bus every 6 minutes. This pushes the limit of the NACTO recommendations for a safe shared bus/bike facility. If there is more frequent vehicle transportation in the future, the bus lane should definitely not be designed to be shared with cyclists. Overtaking a cyclist leaves too much room for human error, especially in the confined space of 12' wide lane.
 - d. Finally, other bus/bike lanes in Boston are shared with MBTA buses whose drivers get specific and detailed training on sharing a lane with bikes. We understand that the Northern Avenue bridge bus lane would be for private shuttles and have no reason to believe that these drivers know how to safely share and pass cyclists.
6. Air quality - As we now understand in a more visceral way than before COVID19, air quality matters to health. We share concerns that were expressed at the last public meeting about air pollution from diesel fumes, given the proximity of pedestrians and cyclists to the bus travel lane.
 7. Future Design Considerations - In the current 25% design, there are two spans (ribbons) each 24' wide. One side is a pedestrian only zone and the other includes a bus/bike lane (12'), an unprotected bike lane (6'), and a pedestrian walkway (6'). The plan is designed to keep bikes separate from the pedestrian side, by signing that they ride in or adjacent to bus/shuttle traffic. However, we do not believe this design is realistic given that we can expect tourists and people who are new to the bridge to ride in whatever space is furthest from vehicles, and who also will want to visit the ocean side of the bridge. We suggest separating all bike facilities completely from vehicular facilities, and providing a bike lane with clear ocean views. If the purpose of this bike lane is to be a recreational bike path, which we support, then we suggest designing bike lanes for people to ride 2 abreast which demands that the lanes be 7.5-8 feet wide.

Public process

Over the past two years, we have raised concerns about the public process on numerous occasions -- and LivableStreets raised these issues formally and repeatedly as an official NAB task force member.

The City of Boston established a NAB task force as a means of utilizing the abundant knowledge the City of Boston has to offer, to direct the process for turning the Northern Avenue Bridge into an iconic destination that improves mobility, strengthens resiliency, and honors history. Unfortunately, this process was mismanaged and flawed from the onset.

Though the Task Force process had been framed as transparent and open to the public, there was limited discussion of public comment and often blatant disregard for public consensus. At each task force meeting, while there was a short amount of time allotted to public comment, there appeared to be no method for incorporating those comments into the process for decision making. Additionally, while there was a tool for providing online comment, there was no discussion about how to incorporate those comments into the process.

Similarly, public meetings for the project were problematic. Ahead of the June 2019 public meeting, Stacy Thompson of LivableStreets, along with several other task force members expressed strong concerns and reservations about the approach the City was taking, which appeared to be purposefully obstructive of public feedback. Stacy also followed up with Chief Osgood, the consulting team and the chairs of the committee outlining her direct concerns in writing. None of the feedback was acknowledged or incorporated into the meeting.

In advance of the May 6, 2020 meeting for this project, we again directly expressed our concerns to the project team and Chief Osgood, that it was inappropriate to even hold public meetings of this nature while the State's stay-at-home advisory related to COVID 19 was in place. BTD's decision to hold the meeting was in direct contradiction to the policies of other city of Boston departments such as the BPDA which stated that, "to ensure that the public process is equitable to all", it would not be holding virtual public meetings for Article 80 projects or planning studies at this time. This inconsistency between agencies is concerning and needs to be addressed.

We would be pleased to speak with the MEPA Office or the City of Boston about our comments.

Best regards,

Stacey Beuttell, WalkBoston

Stacy Thompson, LivableStreets Alliance

Becca Wolfson, Boston Cyclists Union

Cc: Mayor Marty Walsh
Congressman Stephen Lynch
State Senator Nick Collins
State Representative David Biele
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
Harborfront Neighborhood Alliance
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