



THE STATE OF NEW HAMPSHIRE
DEPARTMENT OF TRANSPORTATION



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Commissioner

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MEMO

To: Laura Black, Nadine Miller (NHDHR); Senator David Watters, Lulu Pickering, Nathan Holth, Kitty Henderson, Christopher Parker (Consulting and Interested Parties)

From: Jennifer Reczek, P.E., NHDOT Project Manager, and Jill Edelmann, NHDOT Cultural Resources Manager

cc: Sheila Charles, Marc Laurin (NHDOT); Jamie Sikora (FHWA); Peter Walker, Nicole Benjamin-Ma, Gregory Goodrich (VHB)

Date: 01/27/2021

Re: General Sullivan Bridge - Draft Section 106 Mitigation Stipulations
Spaulding Turnpike / Little Bay Bridge: NHS-027-1(037), 11238S
Newington and Dover, New Hampshire

The New Hampshire Department of Transportation (NHDOT) has approved the language of the following draft stipulations for inclusion in the Draft Supplemental Environmental Impact Statement (Draft SEIS) to advance the National Environmental Policy Act (NEPA) process for the rehabilitation or replacement of the General Sullivan Bridge (GSB) (“the Project”).

Potential mitigation for historical impacts to the GSB has been discussed throughout the Section 106 process. Following execution of the Adverse Effects Memo in January 2020, meetings among NHDOT, New Hampshire Division of Historical Resources (NHDHR), the Federal Highway Administration (FHWA), and the Consulting/Interested Parties focused on developing mitigation measures that relate directly to the adverse effects resulting from the Project.

The language of the stipulations to be included in a Memorandum of Agreement (MOA) will be finalized following the publication of and public input on the Draft SEIS. At this time, it is anticipated that the Draft SEIS would be issued for public comment in February depending on FHWA review, with a Public Hearing to follow. While the language of the stipulations to be included in a MOA will be finalized following the publication of and public input on the Draft SEIS, the following mitigation measures relate directly to the adverse effects resulting from the project, and appear to have broad support among most of the agencies and Consulting/Interested Parties. Note that, in addition to the measures listed below, NHDOT will commit to completing additional archaeological studies and coordination efforts to avoid potential impacts, particularly at Hilton Park and the southern bridge abutment.

A. Marketing the GSB

- i. NHDOT shall market the bridge for re-use in compliance with 23 USC Section 144. The structure shall be marketed to the public for relocation with preservation and/or maintenance covenants as agreed to by NHDOT, NHDHR, and FHWA. NHDOT, in consultation with NHDHR and FHWA, shall develop a notice to include, at a minimum, the following:
 - a. A description of the structure;
 - b. Notice that the bridge is eligible for the National Register for its engineering significance;
 - c. Notice that NHDOT will transfer the structure with consideration for the offer that best protects the historic integrity of the bridge; and
 - d. Notice of the requirement that the bridge will be transferred subject to covenants regarding its preservation and maintenance in accordance with the Secretary of the Interior's *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*.
- ii. The contents of the advertisements, the publications in which they appear, and the frequency of publication shall be approved by NHDHR and FHWA. The advertising period shall last a minimum of 60 days.
- iii. If marketing has not been successful after a period of 30 days from the first day of advertisement, NHDHR and FHWA may approve the conveyance of the structure without preservation and maintenance covenants. On such approval, notice of the restrictive covenants may be removed from the advertisements.
- iv. If efforts to market the bridge are unsuccessful, final bid and construction documents shall be completed to specify demolition and disposal of the bridge.

B. Documentation of the GSB

- i. NHDOT shall ensure that the bridge is recorded prior to demolition or relocation, in accordance with the Historic American Engineering Record (HAER) standards.
- ii. The documentation shall be completed by a 36 CFR 61-qualified Architectural Historian.
- iii. The documentation shall follow the guidelines available at <https://www.nps.gov/hdp/standards/haerguidelines.htm>, using the version noted below or subsequent updates, whichever is more recent at the time of documentation:
 - a. Report: NHDOT shall consult with the NPS to determine whether the documentation will follow the "short format" report or the "outline format" for engineering structures described in the HAER guidelines (updated 2017), and to determine how previous state documentation of the bridge can be incorporated into the HAER submission.
 - b. Photography: to follow the guidelines for the HABS/HAER/HALS programs (updated 2015). Photographs shall consist of archival, large-format black and white 4x5" photographs of the superstructure, substructure, relationship of the bridge to its setting, and engineering/aesthetic details.
 - c. Drawings: to follow the HAER drawing guidelines. Original and historic construction plans shall be included as archival copies, or photographed as archival large-format black and white 4x5" photographs.
 - d. The final HAER package shall meet the requirements for HAER documentation transmittal (updated January 2020).
- iv. A digital draft of the HAER documentation shall be submitted to NHDHR for a review and comment period of 45 days.
- v. After addressing NHDHR comments, NHDOT shall, on behalf of FHWA, provide a draft digital copy to NPS for review and comment.
- vi. One final copy of the completed HAER documentation shall be submitted to NPS by NHDOT.
- vii. One archival copy of the final HAER documentation shall be produced by NHDOT for NHDHR, which will provide an electronic copy. The NHDHR copy of the HAER materials shall include: large format photos and negatives, photo location maps, narrative, and high-quality photocopies of the photos.
- viii. One archival hard copy of the final documentation shall be provided to each of the City of Dover and the Town of Newington for storage at an appropriate local repository. An electronic copy shall be provided to additional local repositories upon request. NHDOT, in coordination with Consulting/Interested Parties, may proactively identify additional local repositories which may be interested in receiving an electronic copy of the completed HAER documentation.
- ix. An electronic copy shall be provided to additional Consulting/ Interested Parties, upon request.

C. NHDOT Bridge Inventory and Bridge Management Plan – Promotion and Accessibility

- i. NHDOT shall assist NHDHR in the integration of the finalized bridge inventory into the EMMIT online database and mapping tool, which is available by subscription. NHDOT shall also provide the finalized bridge inventory on its own website, where the inventory will be freely available to the public.
- ii. NHDOT shall ensure that promotion of the finalized bridge management plan includes a broad range of internal and external outreach to engineers, municipalities, state DOT employees, and the public, including the use of virtual platforms. Outreach and educational efforts may include:
 - a. Session(s) at the American Council of Engineering Companies (ACEC) annual conference
 - b. Session(s) at the New Hampshire Municipalities Association (NHMA) annual conference
 - c. Internal training for NHDOT employees and its consultants

- d. Regional workshop for engineers, including representatives from other state DOTs regarding their own state's efforts to maintain historic bridges.
- e. Potential workshop and session partnerships with NHDHR, the New Hampshire Preservation Alliance, and the Association for Preservation Technology International.

D. Interpretive Program

- i. NHDOT and/or its consultant shall develop an interpretive program centered around the historic significance of the GSB. The following elements have general support among the Consulting/ Interested Parties and may be included in the interpretive program:
 - a. On-Site Interpretive Panels – NHDOT shall fund and oversee between three (3) and five (5) interpretive panels located at or near the bridge crossing, including locations at, but not limited to, Bloody Point in Newington, Hilton Park in Dover, and the former railroad bed. The panels shall convey the transportation history of the Little Bay crossing (ferries, trains, and autos) and the GSB's role in this timeline, and the engineering significance of the GSB.
 - Consultation on the themes, siting, and content of the panels shall be between NHDOT, NHDHR, the Consulting Parties and the respective towns.
 - The content will be developed by an Architectural Historian qualified under 36 CFR 61, and a professional graphic designer shall be engaged to create the design and layout of the interpretive panels and/or elements.
 - NHDHR shall be consulted for review and comment on the preliminary draft content of the panels as well as the draft final mockups of the panel design(s) in their entirety.
 - After submission of the preliminary draft content and draft final panels, NHDHR and the Consulting Parties shall have 30 days to review and comment on the draft final text/layout of the displays.
 - NHDOT and the content developers will determine whether the incorporation of elements salvaged from the GSB as support structures for interpretive elements is feasible (not as public art).
 - NHDOT and the content developers will determine whether the incorporation of a QR code linking to additional online content is feasible.
 - b. NHDOT shall develop a lesson plan for primary school students on the subject how bridges are used to facilitate multiple modes of transportation, and the importance of these connections to people and the economy on a regional scale.
 - The lesson plan will be prepared and produced by a professional(s) with demonstrable industry experience in primary education, with technical and logistical support provided by NHDOT.
 - To enhance this initiative, NHDOT will pursue a partnership with Historic New England, specifically its "Hidden History: Spanning the Canal" program for homeschool students. This will facilitate the consideration of the GSB and Cape Cod Canal bridges together, which all have similar historic significance as influential FST structures and vital transportation links despite their geographic distance.
 - The lesson plan shall have two components to maximize its availability.
 - A classroom lesson plan, similar in format and length to the National Park Service's "Teaching with History" plans.
 - An in-person student workshop (2-3 hours) intended to be led by an adult educator familiar with the classroom lesson plan and materials.
 - The lesson plan shall include the use of primary sources, including items from the collections of repositories such as Historic New England's archives; the Woodman Institute; the Portsmouth Athenaeum; the archives of NHDOT and MassDOT, and local historical organizations.
 - The lesson plan will focus on visual and textual documents associated with spanning the Little Bay and/or the Cape Cod Canal over time, and tourism ephemera from the same era as the construction of the GSB and Cape Cod Canal bridges.
 - In-person workshop activities will allow students to design a new bridge and create an accompanying tourism brochure.
 - The in-person workshop materials are intended to be mostly printed or purchased on-demand, requiring little if any physical storage space.
 - The classroom lesson plan component shall be made available online for download at no cost. The in-person student workshop curriculum shall be available to local schools, institutions, and organizations with an educational focus as part of their outreach program. The workshop curriculum will be provided upon request to Historic New England and up to four additional appropriate entities, to be identified.
 - A distribution and/or advertising plan targeting intermediate units or school districts in the vicinity of the Project and detailing how the lesson plans will be made available is required. Release of a lesson plan will be accompanied by appropriate local and regional publicity and preparation social media posts.
- ii. The following potential elements of the interpretive plan require further research and development to determine their feasibility and appropriateness:

- a. A crowd-sourced photograph project, such as an ArcGIS StoryMap or community scanning day, providing a platform for the public to submit personal photos that show the bridge and/or the crossing, accompanied by dates, names, and memories of the occasion of the photos. Submissions may be made via an online portal set up and promoted by NHDOT, and on-site photo scanning workshops in the City of Dover and Town of Newington.
- b. A film documentary about Fay, Spofford & Thorndike's four early prototypical continuous truss bridges, including information on why this set of bridges was so influential, how the firm adjusted its approach at each location, and the context of each bridge. The film may be posted online and screened in person at various locations accompanied by the traveling exhibit.

E. Rehabilitation of the Newington Railroad Depot and Toll House and State-Owned Land on Bloody Point

- i. NHDOT shall support the future rehabilitation and reuse of the state-owned portion of the Newington Depot property, according to the *Secretary of the Interior's Standards for Rehabilitation*. Specifically, NHDOT shall:
 - a. Engage a consultant to prepare a building assessment of the Newington Depot, following the NH Preservation Alliance's format, identifying extant character-defining features and potential future uses that can support the retention of these historic features. An electronic copy of the final assessment shall be provided to NHDOT, NHDHR, and the Town of Newington.
 - b. Develop a land master plan and a rehabilitation plan for the Newington Depot property based on the results of the building assessment.
 - c. Provide direct financial support for the rehabilitation of the Newington Depot property based on the building assessment, land master plan, and rehabilitation plan up to \$(to be determined). Any costs beyond this amount shall be provided by the Town of Newington or a third party (see Stipulation E.ii below).
- ii. NHDOT shall continue discussions about the feasibility of transferring ownership of the property to the Town of Newington. If a mutual agreement cannot be reached, NHDOT shall market the property for sale at fair market value with a historic preservation covenant, to be held by NHDHR, requiring rehabilitation by the future owner that meets the *Standards for Rehabilitation*, to be overseen and approved by NHDHR as holder of the covenant.

F. Dover Recreational Trail

- i. NHDOT shall coordinate with the City of Dover to evaluate the feasibility of constructing a link between the existing Community Trail on the former rail bed of the Newington-Dover Branch line and the new bridge to be constructed on the site of the GSB. The Community Trail currently ends in the vicinity of Central Avenue (NH 108) and Rutland Street and options may include a short section of shared use path within the Spaulding Turnpike right-of-way to then follow Finch, Spur and Boston Harbor Roads to the new bridge. If a plan for the trail can be mutually agreed upon, NHDOT shall determine the nature and extent of support the agency can provide for the undertaking.
- ii. The feasibility study shall develop information which highlights the history of the Newington-Dover Branch line and its connection to the history of the transportation corridor including the GSB. The study shall make recommendations on incorporating interpretive signage into the design of the recreational trail.
 - c. Interpretive Signage – NHDOT shall fund and oversee the development of up to three interpretive signs/panels to be installed along the trail, conveying the history of the railroad and/or the transportation history of the area.
 - d. In recognition that exact siting of the signage cannot be finalized during a feasibility study, NHDOT will provide high-resolution digital copies of the signage to the City of Dover to make available to the public. These files will contain production-ready content for later fabrication.
 - Consultation on the content of the panels shall be between NHDOT, NHDHR, and the City of Dover.
 - The content will be developed by an Architectural Historian qualified under 36 CFR 61, and a professional graphic designer shall be engaged to create the design and layout of the interpretive panels and/or elements.
 - NHDHR and the Dover Heritage Commission shall be consulted for review and comment on the preliminary draft content and layout of the signage as well as the draft final mockups of the signs in their entirety.
 - After submission of the preliminary draft and draft final signage, NHDHR and the Dover Heritage Commission shall have 30 days to review and comment on the draft final text/layout of the displays.