



THE STATE OF NEW HAMPSHIRE
DEPARTMENT OF TRANSPORTATION



Victoria F. Sheehan
Commissioner

William Cass, P.E.
Assistant Commissioner

Newington-Dover
11238S
[Spaulding Turnpike, NH Rte. 16, GSB]

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April 9, 2019

Timothy Connors
Chairman
Newington Board of Selectmen
205 Nimble Hill Road
Newington, NH 03801

Dear Mr. Connors,

The Department has in hand the Board of Selectmen's March 15th letter to FHWA (Jamie Sikora) in reference to the environmental re-evaluation for the General Sullivan Bridge (GSB). The Board's letter is in regards to the Department's focused re-evaluation for alternatives in reference to the action as outlined in the original 2007 Final Environmental Impact Statement (FEIS) for the GSB. The Department has also received a near duplicate letter from the Newington Historic District Commission member, Ms. Lulu Pickering, who is a consulting party member to the Section 106 historic re-evaluation process.

The Department appreciates the Town's input in this critical infrastructure decision to accommodate pedestrian and bicycle access between the Town of Newington and the City of Dover, as well as, serving your neighboring seacoast communities. Your letter outlines nine distinct comments relating to the GSB. The intent of this letter is to address each concern and to offer to meet with the Board to extend the dialog should you feel it necessary.

1. Position of the Board of Selectmen

The Department appreciates the Board's position in favor of the alternative for the rehabilitation of the aging steel truss structure. 6. Your input is appreciated and will add to the collaborative public input process and consultation with federal, state and consulting parties as outlined by the "October 2017 Coordination Plan for Agency and Public Involvement; Supplemental Environmental Impact Statement (SEIS) for the General Sullivan Bridge (GSB)." This document is available on our project website at: http://www.newington-dover.com/gsb_subsite/contract_documents.html.

2. Historic Value of the GSB is now at \$14.5 Million

Under the 2007 NEPA evaluation, two primary alternatives were evaluated for the GSB to include rehabilitation of the historically, technological significant bridge and structure full replacement. During the evaluation process that lead to the 2007 decision, public input was obtained in support of both alternatives (see <http://www.newington-dover.com/html-studydocs/feis.html>). Based upon the cost estimation of the alternatives in 2007, the difference in the construction values between the two alternatives was estimated at \$14.5M more for the preservation alternative. This earlier evaluation

was completed on the presumption the aging structure was materially in good structural condition to support this decision without a detailed, structural inspection. After the issuance of the ROD, the Department proceeds to completed structural inspections in support of the original decision under the subsequent engineering contact with VHB. Two extensive hands-on structural inspections were completed in May of 2014 and June of 2016 that brought to the light the level of deterioration that exists on the GSB, which puts the original commitment into question. Both these inspections resulted in sequentially greater restriction of access on the structure for the safety of the public. With the latest inspection in September 2018, the continued deterioration resulted in the immediate closure of bridge for public access.

To further evaluate the potential for rehabilitation, an in-depth analysis was completed for painting the built-up truss structure. Due to the extreme pitting of the steel on the bridge and the level of pack-rust within the critical truss joint connections, the feasibility for painting the structure has been called into question. The painting operation and structural repairs represent a very significant investment of time and expenses than envisioned prior to 2008. Due to the extremely high risks, it puts into question the prudence for rehabilitation of the GSB.

Given the follow-up bridge inspections and paint evaluation, the feasibility for rehabilitation of the old, aging truss is now called into question as to whether it is prudent and feasible to undertake.

Measures for historic mitigation to compensate for the loss of the GSB will be developed through a collaborative, public input approach consistent with the Section 106 process should a replacement Preferred Alternative move forward as the Selected Alternative. This will result in the execution of a “memorandum of agreement” through FHWA and SHPO with input from the consulting parties for the determination of appropriate mitigation. There are no regulatory requirements that tie the value of mitigation to a cost differential of preservation versus replacement.

3. Use of \$49.71M in Federal Funds

At the February 12th meeting with SHPO, FHWA, NHDOT and consultant parties, we had an extensive discussion on issues around the GSB, to include what program funds will be used to pay for the final Newington-Dover project. The Department explained that the Turnpike Expansion Program funding will be used to construct an improved pedestrian/bicycle crossing over the Little Bay. Regardless of what funding stream is being used, the cost of either alternative will ultimately affect the Department’s overall Turnpike Expansion Program. With a lower cost alternative, it will allow other high priority Turnpike projects to be accelerated; whereas, a higher cost alternative will require shifting priorities projects to cover the increased costs, which will include funding for the preservation of red listed structures within the turnpike system.

The reference to the 2017 Financial Plan Update is correct as to the use US Congressional authorizations of federal earmarks funds for the construction of the Newington-Dover 11238L contract. The 11238L contact consisted of the construction of the new southbound turnpike bridge over the Little Bay and the serpentine ped/bike access ramp to the GSB on the Dover approach.

Because FHWA was the lead federal agency over the original NEPA action for the project, FHWA remains the lead federal agency on the project’s NEPA supplemental modification to the original NEPA approval. The modification will continue to be done through a collaborative public input process and consultation with federal, state and consulting parties as outlined in the October 2017 Coordination Plan.

4. Delay in Rehabilitating the General Sullivan Bridge (Contract S)

The Department recognizes the Board's observation and concerns for limited investment of public funds to address this ailing structure since it was taken out of service in 1984. The Department also recognizes the responsibility in maintaining our infrastructure across the State. This responsibility continues to be a challenging task when the State's infrastructure needs outpace the revenue to undertake the tasks. As such, the Department is continually put into the perplexing position to prioritize the use of the limited funding to address the statewide needs. As you would expect (and whereas as you may disagree) the first priority for the Department is safe and efficient, intermodal use on the State highway system. The priorities are established through State's legislative development of the Ten Year Transportation Plan (10-Year Plan), which includes a transparent interactive process through our Regional Planning Agencies (RPC), and Governor's Advisory Commission on Intermodal Transportation (GACIT) prior to legislative review and adoption by State Law.

Funding has been set aside through the 10-Year Plan and Turnpike Expansion Program to address the pedestrian and bicycle access across the Little Bay (i.e.: Contract 11238S). The original vision has been to complete the rehabilitation of the GSB in compliance to the NEPA approval. As previously discussed, the subsequent inspections have shown how severe the deterioration of the existing truss structure puts into question the feasibility to meet the original commitments. Our updated project estimates and evaluation of risks supports the re-assessment of the original commitments.

Since 1984 when traffic was removed from the bridge, the GSB has seen multiple repairs to ensure safe passage for the multi-modal use by pedestrian and bicycles. Through maintaining this multi-modal use, the Department remained in compliance with the US Coast Guard Permit of 1964 (amended in 1982 and 2010). Under our permit with the Coast Guard, no transportation use would require the complete removal of the aging structure.

As outlined in the October 2017 Coordination Plan, the overall Newington-Dover project sequencing was established with the primary objective to build the expansion of the Turnpike over the Little Bay to allow the temporary use of the Turnpike bridge crossings for bikes and pedestrians while the GSB contract is under construction. This project sequence has been outlined at numerous public information meetings held on this project since NEPA approval. While the Department did float the idea of using a shuttle service instead of using one of the Turnpike bridge crossings to allow advancing the project, this suggestion was not supported by the seacoast bike advocacies. (See PIM meeting reports at <http://www.newington-dover.com/meetings.html>).

There was no malicious or intentional action on the Department to neglect the maintenance of the GSB. Department has been actively working toward a cost-effective, sustainable solution through a re-review of alternatives. The Department has completed its due diligence to inspect the aging bridge to ensure safe passage can be accommodated. This has resulted in multiple maintenance repairs since 1984.

The Department is in the process of finalizing a statewide historic bridge inventory and management plan, which will promote more consistent coordination with communities and assist with long-term planning and stewardship efforts. The Department would also support the Town's effort to work through Rockingham Regional Planning Commission and the GACIT Commission to pursue dedicated funding for preservation and protection of historic bridge resources as outlined in the statewide historic bridge inventory and management plan.

5. Politicized Process

HB 2018 (Chapter 358) does include provisions that limit funding authorization for the GSB. While this remains the legislative direction, it does not preempt limit the Department's responsibilities to review alternatives under NEPA. Should the rehabilitation of the GSB continue to be supported through the NEPA re-evaluation, the Department will need to go back to the GACIT committee and NH General Assembly to seek a change to the Chapter 358:12 law.

6. Considerations to be Used in Deciding Among Bridge Alternatives

The NEPA re-evaluation process for a re-review of alternatives for the GSB meets the federal regulatory process and has been vetted through stakeholders with the procedure as outlined in the October 2017 Coordination Plan. As with any project requiring complex decisions, there will be agreements and disagreements as to the outcome, but the 'process' will be transparent and open as to how these decisions are being made.

7. Life Cycle Cost Analysis

Your observation is correct that the original 2007 Final EIS did not use life cycle costs analysis. Should this analysis have been done in 2007 and a more detailed structural analysis of the bridge condition, it may have had an impact on the final outcome. The life cycle cost analysis remains an effective tool to assess the cost-effective, prudent, feasible and practical evaluation. To not consider future life-cycle cost for the major infrastructure investment could result in an incomplete evaluation of the alternatives.

The Department appreciates the Board's input on the life-cycle analysis and do not agree with the Board's portrayal that the intent of this process is to "argument that the GSB must be destroyed." The general conclusions of the life-cycle cost analysis remains valid and conclusive as to long-term maintenance cost for all alternatives.

As for the ultimate value of the mitigation for the potential loss of the historic structure, it will be addressed after the affects determination is officially made and will be developed through a collaborative, public input approach consistent with the Section 106 process.

8. Retaining the GSB Piers is Not Historic Mitigation

The use of the existing piers will provide some economic benefit for the replacement of the multi-use bridge across the Little Bay. It is not the Department's intent to include the reuse of the piers as part of the mitigation for the loss of the GSB. Pier inspection has shown the GSB pier construction was completed with a high quality of engineering and construction that will continue to allow the original foundation to serve the new structure over its life-span of 75 years or more.

9. Archeological Sensitive Area of Hilton Park

A qualified consulting archaeologist will undertake archaeological investigations in sensitive areas within the project area of the proposed laydown at the former Pinkham Brickyards in the City of Dover. If necessary, construction staging will be adjusted to avoid, minimize, or mitigate any potential impacts to any extant features or deposits associated with the former Pinkham brickyards. Should the investigation limit our use of the site, we will look to use the State parcels located in the vicinity of the GSB in town of Newington and Dover.

The Department appreciates your comments on the ultimate solution for the pedestrian and bicycle access across the Little Bay. Should your Board feel it necessary to have the Department meet for further discussion and overview, please let me know and we can arrange a time and date for this meeting. Should you have any questions, feel free to contact me at (603) 271-1615 or email me at Keith.Cota@dot.nh.gov .

Sincerely,



Keith A. Cota, PE
Chief Project Manager

KAC/kac

CC: The Honorable Martha Fuller Clark, NH Senate District 21
The Honorable David Watters, NH Senate District 4
Jamie Sikora, FHWA
Laura Black, NH Division of Historic Resources
Commissioner Victoria Sheehan
Lulu Pickering, Chair, Newington Historic District Commission
Jillian Edelmann, Cultural Resources Manager
Marc Laurin, Senior Environmental Manager
Peter Walker, VHB

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