



THE STATE OF NEW HAMPSHIRE
DEPARTMENT OF TRANSPORTATION



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Spaulding Turnpike / Little Bay Bridge

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April 15, 2019

Consulting Parties
Newington-Dover 11238S
General Sullivan Bridge

RE: Newington-Dover 11238S/ - General Sullivan Bridge
NHPA Section 106 Consultation

Dear Consulting Parties:

The intent of this letter is to address feedback on the draft Alternative Analysis. This response is intended to address the March 15, 2019 email from Ms. Laura Black, Preservation Compliance Specialist and Easement Program Coordinator for NH Division of Historical Resources (NHDHR) and the March 15, 2019 letter from Ms. Lulu Pickering, Consulting Party Member from Newington Historic District Commission (copies enclosed). Both communications were addressed to Mr. Jamie Sikora of the Federal Highway Administration ("FHWA"). New Hampshire Department of Transportation ("NHDOT") appreciates your interest and active participation as a Consulting Party in the Section 106 process for the Spaulding Turnpike Newington-Dover, 11238S Project. According to the National Historic Preservation Act ("NHPA"), consulting parties are entitled to share views, receive and review pertinent information, offer ideas, and consider possible solutions together with the Federal agency and other consulting parties. Consultation is the process of seeking consensus about how the effects on historic properties should be handled; as such, your detailed review and consideration of several aspects of the Project is a valuable part of this process and discussion.

NHDOT would like to offer the following information in response to your submitted comments on the Draft Alternatives Analysis to evaluate alternatives for the rehabilitation or replacement of the historic General Sullivan Bridge ("GSB").

NHDHR (Laura Black)

Bullet # 1

- *p.7, Section 5: As written, the section is focused on just the bridge, which is potentially misleading. Recommend making the section of "Impacts to Section 106 Properties" inclusive of all Section 106 properties, not just the bridge. Recommend adding a sentence or two acknowledging the existence of other NR eligible properties in the vicinity, whether they are or aren't in the current APE, and whether the various alternatives in question would/would not impact them. You could also note simply if the impacts will/won't be different across the alternatives if that's the case. 137 Beane Lane has yet to be inventoried and it's NR status is unknown yet, but should be mentioned and text updated when the inventory is complete. There's also unknown archaeological resources to take into account in the text.*

NHDOT Response

NHDOT supports the suggested clarification the inclusion of all Section 106 properties. Obtaining access to 137 Beane Lane has been a challenge. NHDOT has attempted to contact the property owners via mail twice (certified notice and general mailing) without any success. The property assessment will be completed with the best available data we can achieve within the public right-of way (roadway and water). NHDOT will continue to seek approval from the property owners for access to this private, secluded residential property, and supplement the inventory assessment as needed if access is obtained between the submission of the inventory form, and the completion of the SEIS.

NHDOT is developing a work scope with a qualified consulting archaeologist to undertake all appropriate phases of archaeological investigations in sensitive areas within the project area, which will be discussed in the SEIS.

Bullet # 2

- *P.9, Section 6.2: Acknowledge potential Adverse Effects to resources still to be inventoried/surveyed*

NHDOT Response

NHDOT supports the suggested clarification for the acknowledgment of potential Adverse Effects to the inventoried/surveyed Section 106 properties.

Bullet # 3

- *P.13, para 3: Alternative 9. What is the definition of “excessive” in this context? Historic resources are part of the environment/environmental studies within Section 106 and NEPA and it seems that Alternative 9 would result in an excessive impact to at least one historic resource – the bridge.*

NHDOT Response

The reference in this section of Alternative 9 summary is in direct reference to the constructability as it relates to the natural environment and impacts to traffic along the southbound Little Bay Bridge. NHDOT agrees the loss of the existing bridge would be an adverse impact for the cultural importance of the structure and any other inventoried Section 106 properties. This paragraph will be modified to reflect the correct association for ‘excessive.’”

Newington Historic Commission, Lulu Pickering

Comment 1. Position of the Newington Historical Commission

The Newington Historic District Commission favors rehabilitation of the GSB (now Alternative #1D). The GSB adds character and keeps a beautiful and historic engineering design as part of our Town's landscape. It reminds everyone that Newington is more than just a highway or something to be tarred over for future highway expansion.

The Newington Historic District Commission is also concerned that NH DOT has developed a pattern of going through the motions of Section 106 with no real intent to spend money on historic resources or the MOUs associated with them.

It is vitally important that communities be able to trust the integrity of the Section 106 and Section 4(f) processes and the entities involved. The federal laws than mandate appropriate mitigation when federal money is used for a project that adversely impacts historic resources should not be circumvented just because limited funds are desperately needed in other parts of the state for other construction projects.

NHDOT Response:

We acknowledge the Newington Historic District Commission’s support for Alternative 1: Rehabilitation of the General Sullivan Bridge. NHDOT recognizes the important role that the GSB has played as part of the landscape of Newington for decades. As engineers, we appreciate how the construction of the GSB

overcame design challenges and served as one of the models for highway continuous bridge construction. We recognize bridges aren't always a simply way to get from one point to another; they can become a fabric of the local society.

NHDOT takes its diverse responsibilities seriously, including public safety, maintaining quality of life in New Hampshire, as stewards of some of the state's most uncommon and varied historic resources. Actions that may diminish any of these public duties are not taken lightly, and we strive to carefully balance the many variables that affect transportation decisions. It is with this goal that NHDOT employs two full-time cultural resources specialists in our Bureau of Environment. We are proud to have dedicated staff members and we expend substantial effort to ensure cultural resources are earnestly considered in our decision-making processes. While not all historic resources can be preserved indefinitely, we make a concerted effort to continuously improve our management and stewardship practices.

NHDOT fully agrees that the revaluation process for GSB needs to rely on a trust on the integrity of the Section 106 process. The "October 2017 Coordination Plan for Agency and Public Involvement; Supplemental Environmental Impact Statement (SEIS) for the General Sullivan Bridge (GSB)" has been developed to outline the collaborative public input process and consultation with federal, state and consulting parties. This document is publicly available on our project website at: http://www.newington-dover.com/gsb_subsite/contract_documents.html .

Comment 2. Historic value of the GSB is now \$14.5 million

The October 2008 Record of Decision stated:

- *"Mitigation for the impacts to the General Sullivan Bridge will include its rehabilitation for use by pedestrians and bicyclists and its continued use for fishing.*
- *"... taking into account the costs that would have been required for removal of the GSB and replacement of the pedestrian, bicycle and recreational connection across Little Bay, the total net cost to the project is approximately \$10.9 million." The \$10.9 million was approximately 4.8 percent of the total project costs, which were then \$228.7 million.*

In 2008 the GSB was to be saved and the premium for doing so was \$10.9 million. This premium is the de facto historic value of the GSB bridge at that time. Although historic mitigation for other structures under the project was also necessary, saving the GSB was the primary cost for historic mitigation under the entire \$228.7 million project.

In vhb's January 15, 2019 computations, the difference in costs between rehabilitating the GSB (\$43 million) and the preferred alternative (\$28.5 million) have risen to \$14.5 million.

If the GSB is destroyed, \$10.9 million to \$14.5 million is still on the table for historic mitigation. The State of NH has no authority (except that given to it by FHWA) for reassigning the \$14.5 million gained from destroying the GSB to other highway projects. These funds should be spent to preserve historic resources in the two towns of Dover and Newington whose landscapes and viewscapes have suffered so much under this project. This highway corridor now encompasses 3% of Newington's total land mass and makes the town look more like the New Jersey turnpike than a small NH village of about 800 people.

NHDOT Response:

The \$10.9 million (or \$14.5 million under updated estimates) is simply the difference in costs between the two main alternatives considered at the time of the 2007 FEIS. It would not be appropriate to interpret this as the cost of mitigation in the 2007 Final Environmental Impact Statement (FEIS), 2008 Record of Decision (ROD), or 2008 Memorandum of Agreement (MOA). There are no regulatory requirements that tie the value of mitigation to a cost differential of preservation versus replacement. To do so would set an

unprecedented standard for the establishment of mitigation on environmental or cultural resource impacts for future transportation projects.

Any mitigation measures that may result from this project are intended to be beneficial to surrounding communities and would be developed in coordination with the New Hampshire State Historic Preservation Officer (SHPO), Section 106 Consulting Parties, and other interested parties. As such, appropriate compensatory mitigation will be explored for the project should a replacement Preferred Alternative move forward as the Selected Alternative. The NHDOT and FHWA will continue to consider and evaluate potential meaningful mitigation measure(s) during the ongoing Section 106 consultation and Section 4(f) analysis for the project. The Department fully intends to develop a mitigation package that is commensurate with the scope of the undertaking and the type and significance of the impacts.

Comment 3. Use of \$49.71 million in Federal Funds

At the February 12th cultural resources meeting, Keith Cota argued that no Federal monies were available for the bridge project and that he could not justify using turnpike funds to rehabilitate the GSB for pedestrian use when so many other red listed bridges in New Hampshire needed attention.

The September 2017 Financial Plan Update indicates that of the \$286.5 million to be spent on the Newington-Dover project, \$49.71 million were from federal funds (see Table 5-1 and Fig. 6.1-1 Source of Newington - Dover Funding [2017 Dollars]). Clearly federal funds have been used for performing the work under the December 2007 Final Environmental Impact Statement and its 2008 Record of Decision, which encompass the entire 3.5-mile project including the rehabilitation of the GSB.

Furthermore, the September 2017 Financial Plan Update states "New Hampshire has secured special federal designations from four federal earmarks via congressional action These earmarks are being provided by the Federal Highway Administration (FHWA) and directed toward the construction of the new independent sister bridge adjacent to the existing Little Bay Bridge and the approach roadway work, identified as Newington-Dover Contract L." Clearly, federal funds were used in the construction of the new southbound bridge next to the GSB. Just because the only remaining funds for the entire Newington-Dover project are NH turnpike funds does not mean that no money can be spent on rehabilitating the GSB – especially since federal funds were used for constructing the new southbound bridge (Contract L).

Arguing that the federal government is not going to pay for rehabilitating the GSB and that no turnpike monies should be spent on such a project is misleading at best. This tactic undermines the whole intent of funding historic resource mitigation in highway projects that use federal funds and leads to public and stakeholder distrust in the whole section 106 and section 4(f) processes. The protection of historic resources should not be so casually tossed out the window.

NHDOT Response:

It is the NHDOT's Bureau of Turnpikes responsibility to develop, maintain and operate transportation infrastructure along the corridors of I-95, the Spaulding Turnpike and the F.E. Everett Turnpike which make up the NH Turnpike System. The construction of projects along the NH Turnpike System is financially supported primarily through the collection of tolls and the issuance of revenue bonds as approved through the NH Legislature and the Governor and Executive Council. Occasionally, the use of federal funds on the NH Turnpike System is allowed as was the case with the US Congressional authorizations of federal earmarks.

The 2017 Financial Report outlines where and how much federal funds were used to support the Newington-Dover 11238 project. At the present time, no federal funding is being allocated for the General Sullivan Bridge Project, however, with FHWA being the federal agency on the NEPA approval for the project, including this supplemental NEPA action, it will allow for the flexibility on use of federal funds either through specific federal funding or by special federal grant funds.

The NHDOT, as stewards of the public transportation system, abides by the regulations to develop and evaluate multiple alternatives through the NEPA collaborative public process before selecting a Preferred Alternative to advance to final design and construction. The analysis and selection of the Preferred Alternative is based on sound planning and engineering practices and processes with evaluation of impacts on environmental and cultural resources and a transparent public involvement process. The NHDOT approaches projects with the federal regulatory authority defined under Section 106 and Section 4(f) processes to ensure compliance with federal regulations to allow NHDOT to capitalize on unexpected federal funding should it become available.

NHDOT recognizes how the GSB has become part of the “fabric” of the local community even as the rest of the community is changing, and how one could consider preservation to be the priority commitment at whatever cost. However, NHDOT has to deal with statewide transportation needs that are outpaced by the limited funding allocated through our legislative priorities. This requires the statewide prioritization of operation, maintenance and infrastructure expansion for the whole transportation system which will likely conflict with your assessment that the GSB should have a high priority for maintenance and preservation funds, no matter what the costs.

The selection and funding of projects, as required through RSA 228:99 and RSA 240, requires NHDOT to propose a Ten-Year Plan to the NH Legislature for review, comment and approval every two years. The development of the Ten Year Plan includes extensive public involvement and reviews by the Governor’s Advisory Commission on Intermodal Transportation, the Senate Transportation Committee, the Public Works and Highways Committee and the Governor. The Ten-Year Plan is fiscally constrained by limited state and federal funding. Therefore, NHDOT, in conjunction with the above-mentioned reviewing authorities and the public, through the development of and revisions to the Ten-Year Plan, prioritize investments to public transportation infrastructure for eventual approval by the NH Legislature.

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

Obviously, NH DOT left the rehabilitation of the GSB until the final stages of the Newington-Dover project. For eleven years the State spent nothing on maintenance for the GSB, it restricted access to it, and then left it to further rot in place. The August 15, 2016 Load Rating Report by VHB and HDR Engineering lists some work on sections of the sidewalk and roadway but states, “There is no record of any major repair of the structural steel.” For thirty-two years, NH DOT made no efforts to maintain the steel truss elements that are the major design and engineering features that make this bridge so historic and now argues that it is these elements that are beyond repair.

Anyone who cares for old buildings and structures knows that lack of maintenance is a recipe for disaster and a path to ultimately declaring that the structure is too far gone to be repaired in a costly manner. The question is how far can the requirements of Section 106 and Section 4(f) be bent before no one has any faith in the whole system? Clearly, something went very wrong with the mandate to save the GSB and rehabilitate it for use.

The only reason given to the public in the October 18, 2017 Coordination Plan for Agency and Public Involvement; Supplemental Environmental Impact Statement for the General Sullivan Bridge is:

“The Project construction sequence for the Newington- Dover improvements required the scheduling of the GSB rehabilitation work after the full completion of the Spaulding Turnpike roadway expansion to allow for the potential use of the southbound shoulder on the southbound Little Bay Bridge for use as a bicyclist and pedestrian detour without loss of roadway capacity across Little Bay.”

This sole reason is flimsy at best. There is no indication that the southbound shoulder was ever used for bicyclist and pedestrian traffic. Shuttle buses were the preferred alternative and when the GSB was closed last Fall, NH DOT again proposed shuttle buses or use of the northbound bridge.

Certainly, the public and various stakeholders deserve a much better post-mortem on what went wrong in the whole process and an analysis of what should have occurred so the GSB could be rehabilitated in a timely manner and at less cost. As things stand now, it looks like the neglect of the GSB was intentional because NH DOT thought its turnpike funds would be better spent doing some other highway/bridge projects. This standard operating procedure by NH DOT must change or every historic resource in the state will be doomed to a similar fate even when federal money is spent on those projects.

NHDOT Response:

The NHDOT disagrees with the assertion that the Department made no effort to maintain the GSB. Attached to this letter is a log of the maintenance activities conducted since the GSB was closed to vehicular traffic in 1984. The list of maintenance activities is lengthy.

The first stages of the Newington-Dover project prioritized work on the Little Bay Bridges (“LBB”) because these project elements were critical to meeting the project Purpose and Need to improve traffic safety through added vehicle capacity. Once this has been accomplished, the turnpike expansion across the Little Bay would facilitate a temporary shoulder use for the continued pedestrian and bicycle access while the GSB is out of service. This could not be accomplished until the roadway and bridge expansion has been completed.

In addition, the expansion of the LBB in advance of the planned rehabilitation of the GSB was necessary so that the expanded LBB could serve as a staging area for construction equipment and materials related to the GSB rehabilitation while still having lane capacity across the LLB for the traveling public. As previously mentioned, the construction of the LBBs allows for a temporary use of the expanded LBB to serve as a temporary detour for bicycles and pedestrians as rehabilitation of the GSB is completed. In fact, the Department is moving forward with a plan to install a temporary bicycle and pedestrian lane on the northbound LBB due to the closing of the GSB.

There was no malicious or intentional action on the Department to neglect the maintenance of the GSB. The Department has been actively working toward a cost-effective, sustainable solution through a review of alternatives and has completed timely inspection of the aging bridge to ensure safe passage can be accommodated. This has resulted in multiple maintenance repairs since 1984 and ultimate closing in 2018.

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.

Comment 5. Politicized process

Shenanigans at the State level are not helpful. The state's 10-year transportation improvement plan (2019-2028) expressly forbids the use of state money to rehab the General Sullivan Bridge. It states:

“358:12 Newington-Dover. The project named Newington-Dover, project number 11238S, which includes the rehabilitation of the General Sullivan bridge, shall be amended in the scope from “rehabilitation” to “remove the superstructure of the General Sullivan bridge and provide the most cost-effective bicycle/pedestrian connection.” Funding for construction shall be moved from 2019 to 2020.”

The deck has certainly been stacked against rehabilitating the GSB. However, the chronic underfunding of the State's 10-year highway infrastructure plan does not supersede NH DOT's responsibilities concerning historic resources under federal laws and regulations. The Section 4(f) and Section 106 processes are federal requirements that supersede NH state laws and rules. The lead agency under the Supplemental Environmental Impact Statement is a federal agency. The Federal Highway Administration administers Section 4(f) and must ensure that the federal requirements for historic mitigation are satisfied.

It is very important that the State is not allowed to manipulate the process and that NH DOT does not try to deliberately circumvent the requirements of federal law that mandate appropriate mitigation when federal money is used for a project that adversely impacts historic resources. It is vitally important that communities be able to trust the integrity of the process and the entities involved.

NHDOT Response:

NHDOT understands that the provision included in the current Chapter 358:12 law for the 10-Year Plan may be inconsistent with the eventual outcome of the re-initiated consultation and Supplemental Environmental Impact Statement. Chapter 358:12 law does include provisions that limit funding authorization for the GSB. While this remains the legislative direction, it does not preempt the Department's responsibilities to review alternatives under NEPA Section 106 and Section 4(f) federal requirements. 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 and the NH General Assembly to seek a change to the Chapter 358:12 law.

Comment 6. Considerations to be used in deciding among bridge alternatives

The NH DOT brought up several considerations while presenting bridge alternatives at the September 5, 2019 (sic) public meeting. The preferred alternative must be cost effective; it must be prudent, a reasonable choice; and it must be feasible, a practical choice.

However, it must also be worthy of trust.

A cost effective, prudent, reasonable, feasible, and practical choice that is arrived at by a flawed standard operating procedure harms not only the historic resource in question but public trust in the whole undertaking.

NHDOT Response:

NHDOT certainly agrees that the transportation decision making process needs to be trustworthy. When selecting an alternative, specific criteria are assessed to evaluate the cost effective, prudent, reasonable, feasible, and practical solution as outlined by state and federal law, as well as regulations.

Section 4(f) of the U.S. Department of Transportation Act of 1966 (codified in 49 U.S.C. §303 and 23 U.S.C. §138) is overseen by the FHWA through the regulation 23 CFR 774. The regulation defines these terms and dictates the alternative selection process and are outlined in the project's October 2017 Coordination Plan.

In compliance with Section 106, Section 4(f), and the National Environmental Policy Act (NEPA), NHDOT and FHWA will continue to consider public feedback in making decisions regarding the project to encourage open and transparent decision-making that is under the public trust.

Comment 7. Life cycle cost analysis

The original 2007 Final EIS did not use life cycle costs in distinguishing between different alternatives. This element was introduced for the first time in the 2017 SEIS to support the argument for demolishing the GSB.

In Keith Cota's August 17, 2017 request to the FHWA to reopen the Section 106 and Section 4(f) processes, he argued even with extensive rehabilitation measures for the GSB, "the service life of the investment will only be about 40 years before more aggressive measures will be necessary (i.e., replacement)." When a 40-year period is considered, the life cycle cost for maintaining the GSB drops to about \$16.4 million, which is in the same ballpark as that for NH DOT's preferred alternative (9B) once the added \$10.9 million to \$14.5 million for historic mitigation (should the GSB be destroyed) is included in the analysis.

In the SEIS, vhb's January 15, 2019 analysis states that a rehabilitated GSB is designed to have a lifespan of more than 75 years:

"A full blast and recoat at year 74 is recommended by KTA Tator if the structure is planned to stay in service beyond 75 years. The planned design life is 75 years; however it is anticipated that the bridge will stay in active service for several years after the planned design life while replacement decisions and new structure design are completed. Therefore, it is reasonable to account for a coating maintenance cost to keep the bridge safe service during this anticipated planning period."

When considering a 75-year time span, it seems unreasonable that inspecting and painting a new bridge (9B) and repairing the road deck for 75 years is only going to cost \$2.78 million. This number is highly dependent on the fudge factor of subtracting \$1.78 million in residual value for this alternative, which is subjective at best for a time point 75 years away.

In a nutshell, the life cycle cost analysis is included in the SEIS to further the argument that the GSB must be destroyed and replaced with a less costly alternative. If this were to happen,

(1) \$14.5 million becomes available to mitigate other historic resources in Newington and Dover. This is the difference between the capital costs of \$43 million to rehabilitate the GSB and the \$28.5 million alternative 9B. This amount is historic mitigation money, not money to be saved by NH DOT so it can spend its turnpike funds on other highway projects. In no case should the historic mitigation of losing the GSB be less than \$10.9 million because that amount is the historic value already agreed and decided in 2007/8.

(2) \$28.25 million becomes savings for NH DOT due to not having to spend more money to maintain the GSB over a less costly and smaller new bridge. This is the difference between the life cycle costs of \$31 million to maintain the GSB and the \$2.75 million to maintain alternative 9B. NH DOT benefits by saving its turnpike-generated money for use on other red-listed highway projects and not the Newington-Dover project.

NHDOT Response:

Life Cycle Costs Analyses (LCCAs) are common practice in studying the full spectrum of costs associated with constructing and maintaining transportation facilities, particularly ones of this size and complexity. FHWA policy encourages the use of LCCA when considering transportation alternatives, since LCCA provides a clearer picture of the true costs of a project over its life. An LCCA was undertaken as part of the Type, Span, and Location (TS&L) study in 2017, to understand the full range of costs over the full life of the investment, and to more completely evaluate and compare alternatives.

The 2017 TS&L study assigned an initial service life to Alternative 1 (i.e.: rehabilitation alternative) of 40 years. However, each of the remaining alternatives were evaluated based on the 75-year planning horizon, which is customary for this type of bridge investment. Once NHDOT initiated the Supplemental EIS and updated Section 106 consultation, we determined that it was necessary to equally evaluate a rehabilitation alternative with a service life of 75 years so that each alternative could be compared over the same planning horizon. Engineering analysis determined the service life of the GSB is driven by the condition of the steel, not fatigue life, which is the case for older structures still receiving vehicular traffic. It was also determined that the service life of the rehabilitation alternative could be extended to 75 years by providing an aggressive maintenance schedule. Therefore, the LCCA was re-evaluated and extended to 75

years to provide a cost estimate that was comparable among all alternatives. If we had not taken this approach, the cost of replacing the superstructure at 40 years would *significantly increase* the LCCA of Alternative 1. The entire cost of constructing a new superstructure would be introduced at year 45, and would be projected another 35 years to match the 75 year planning horizon for the other alternatives. This approach was thought to be too skewed in favor of the other alternatives, and we therefore proceeded to assume a rigorous maintenance schedule for Alternative 1 to extend its service life, which come with future risks.

The LCCA, including residual value, was calculated using common practice methods in accordance with FHWA methodology.¹

Comment 8. Retaining the GSB piers is not historic mitigation

Keeping the GSB piers to support the 9B alternative is not historic mitigation. At the February 12th meeting, Keith Cota agreed that the piers were being kept in order to save money by not having to replace them, not due to historic mitigation from demolishing the GSB. The piers were also not being preserved for future bridge expansion uses.

NHDOT Response:

As discussed in the February 12, 2019 meeting regarding the Section 106 process for this project, NHDOT understands that if the superstructure of the GSB is demolished, much of the character-defining features of the GSB would be lost. Suggestion that retention of the GSB piers was a “partial” impact to the structure in the screening matrix table was the result of our attempt to include consideration of the historic value of the GSB bridge components in the initial alternative screening process, at the request of NHDHR and several Consulting Parties. While NHDOT continues to believe that the piers have value as an historic engineering structure, we will avoid language that implies, or could be interpreted as implying, that retention and reuse of the piers is minimization of adverse effects.

Comment 9. Archaeological sensitive area of Hilton Park

NH DOT has proposed using the area around the Hilton Park pavilion as a construction laydown area (February 12, 2019 Cultural Resource Coordination meeting).

This area has historic and archaeological significance as the location of one of the Pinkham brickyards. Please see Newington Neighbor, Issue #167, June 2011 (attached) for information on the brickyards and the photo below of its proximity to the proposed laydown area and pavilion.

More information is needed to ensure that activities that take place in the proposed laydown area do not harm the value of below-ground structures.

NHDOT Response:

NHDOT agrees that additional information is necessary to understand whether construction staging has the potential to harm intact archaeological features and deposits. NHDOT is developing a work scope with a qualified consulting archaeologist to undertake all appropriate phases of archaeological investigations in sensitive areas within the project area. The work would be performed prior to any construction activities. If necessary, construction staging will be adjusted to avoid, minimize, or mitigate any potential impacts to extant features or deposits associated with the former Pinkham brickyards and/or relocate to other State owned parcels near the GSB in the town of Newington and City of Dover.

¹ See FHWA, Office of Asset Management, Life Cycle Cost Analysis Primer, August 2002.

NHDOT appreciates your comments and continued involvement in this effort. We look forward to continued productive input on Section 106 Supplemental evaluation for the GSB.

Sincerely,



Keith Cota, PE

Chief Project Manager, NHDOT

Cc (by email): 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
Lulu Pickering, Newington Historic District Commission
Kitty Henderson, Historic Bridge Foundation
Anne Rugg, Commute SMART Seacoast
Karen Saltus, Seacoast Area Bicycle Riders
William Cass, Assistant Commissioner
Jillian Edelmann, Cultural Resources Manager
Marc Laurin, Senior Environmental Manager
Peter Walker, VHB
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