

Edelmann, Jillian

From: Black, Laura
Sent: Friday, March 15, 2019 9:19 AM
To: Jamie.Sikora@dot.gov; Edelmann, Jillian
Cc: Charles, Sheila; St. Louis, Christina; Trubey, David
Subject: Newington-Dover 11238S RPR 7241; Draft Alternatives Analysis GSB

Dear Jill and Jamie:

The following are the DHR's current comments to the Draft Alternatives Analysis. We wanted to respond to FHWA/DOT within the timeframe of March 15, although we haven't yet had an opportunity to see and respond to the Consulting Parties' comments which I know are forthcoming. Thank you for arranging the project meeting on February 12, which articulated many valuable thoughts about this project specifically and suggestions for approaching historic bridge management more broadly. We look forward to continuing consultation once all comments are distributed.

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

Thanks,

Laura

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