



Preservation  
Massachusetts

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February 10, 2012

Ms. Pamela Stephenson  
Division Administrator  
Massachusetts Division  
Federal Highway Administration  
55 Broadway 10<sup>th</sup> Floor  
Cambridge, Massachusetts 02142

RE: Comments on Section 106 Review, Mitchell River Bridge, Chatham

Dear Ms. Stephenson:

On behalf of Preservation Massachusetts, I appreciate the opportunity to continue commenting on the Mitchell River Bridge Project following the receipt of the latest Federal Highway Administration Package. Under Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. § 470f, Preservation Massachusetts is a consulting party to this project. Our organization has been aware of this project since last year and became involved as a consulting party due to concerns over the impact the proposed project will have on the existing historic bridge.

Like other consulting parties, including the National Trust for Historic Preservation, Indiana Historic SPANs Taskforce, the Historic Bridge Foundation, the Friends of the Mitchell River Bridge and others, our ultimate goal was to seek alternatives and modifications to the project that will avoid, minimize, and mitigate harm, under Section 106 of the NHPA, and to ensure that the project includes “all possible planning to minimize harm” under Section 4(f) of the Department of Transportation Act, 23 U.S.C. § 138.

Preservation Massachusetts feels that since the Keeper of the National Register’s determination of eligibility for the Mitchell River Bridge, the resulting Section 106 process has increased awareness as to the significance of the bridge and the adverse impact a completely modern replacement would have upon the historic context of the surrounding area. Also, we feel that the 106 process as adhered to by Mass DOT and Federal Highway has resulting in design options that are more sensitive to the historic nature of the bridge and brought historic and contextual significance into consideration, where they may otherwise not have been.

In the latest package prepared by FHWA, Option 3 is presented as the final design for the bridge. This design, with a wooden superstructure and steel substructure, would be an adverse effect on the historic character of the existing bridge and the context of the area. The historic significance of the bridge, as stated by the Keeper is its “exceptional significance as the last remaining single-leaf wooden drawbridge in Massachusetts (and perhaps the entire United States)” and “an exceptionally important part of the community’s historic identity.” Option 3 would negate this and the bridge’s existence as a single-leaf wooden drawbridge.

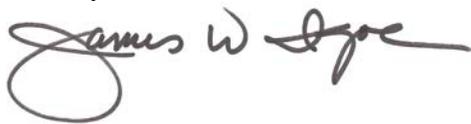
During the 106 process and at the behest of the consulting parties, options that are more context sensitive were presented. The option that best incorporated the historic character and function of the existing Mitchell River Bridge was Option 1B. Preservation Massachusetts still feels that this design option is the most sensitive and compatible with the current bridge. This point was made by many of the preservation partners who are among the consulting parties, and it is disappointing to us to see that such points and recommendations do not appear to have been taken into account by Mass DOT or FHWA.

As per the lasted MOA, Option 3 is still being put forth as the final design option, and proposals for further involvement of the consulting parties is contained consulting on sketches and aesthetic details for the bridge. As we understand the MOA as presented, there is no mention of further discussion of other bridge design options or incorporation of recommendations for a wooden bascule or utilization of wooden piers that was presented by consulting parties.

We feel that Option 1B still represents the most compatible bridge design and would hope that FHWA take this into consideration with the final version of the MOA.

On behalf of Preservation Massachusetts, the statewide advocacy organization for the Commonwealth of Massachusetts, I thank you for the opportunity to participate in this process and offer comments on this project that will have broader reaching effects beyond Chatham. We certainly hope that other communities facing similar situations with historic bridges will look to what has been accomplished in Chatham and look forward to continually working with the agencies involved in this process.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Igoe". The signature is fluid and cursive, with a large loop at the end of the last name.

James W. Igoe  
President