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March 4, 2011

Mr. Rick Marquis, Acting Division Administrator
Federal Highway Administration
55 Broadway, 10th Floor
Cambridge, MA 02142

Attn: Mr. Tomasz Janikula, Area Engineer

RE: I-95/I-93 (Route 128) Transportation Improvement Project
Wellesley to Randolph
Re-evaluation of Environmental Assessment

Dear Mr. Marquis:

The Massachusetts Department of Transportation (MassDOT) Highway Division is submitting this Re-evaluation of the Environmental Assessment for the subject project, seeking your concurrence that the Finding of No Significant Impact issued on October 15, 1998 and re-affirmed by FHWA on March 27, 2002 remains valid as the project's final phase (Bridge V) completes 25% design and other phases are in, nearing or have completed construction. Please see brief overall status of the six contracts attached (Table 1).

Bridge V is the primary focus of this Re-evaluation as a result of more detailed design and analyses conducted since the EA and the last Re-evaluation in 2002; changes to Bridge V are discussed on the next page. All of the phases in construction except for the changes discussed below in contracts for Bridge IV and Roadway I, have been implemented in substantial conformance with the information provided in the 2002 Re-evaluation. However, there was a minor re-location of the Poplar Street noise barrier in Bridge III to avoid blocking a business' sign.

The design of Bridge IV, which received construction Notice to Proceed in May 2010, includes a change to the vertical clearance for the MBTA Needham Branch Commuter Rail Bridge over I-95 (N-04-028). The existing substandard vertical clearance of 14'-2" has resulted in several collisions by overheight vehicles. To increase the vertical clearance to 15'-0", the I-95 profile will be lowered by a full-depth reconstruction in both directions. There are no wetland or other environmental impacts associated with this change.

Identified as an early action item for the I-95/I-93 Interchange Project in Canton, an auxiliary lane in each direction is proposed for the Roadway I contract between I-95 and Route 138 in Canton. The auxiliary lane, less than a mile long, will improve weaving operations in this congested location and can be accomplished without any wetland impacts. For the following reasons, MassDOT does not believe that the addition of the Roadway I auxiliary lanes is a Type I project requiring noise analysis: a) they are less than one mile long and extend only between the two interchanges to ease weaving issues; b) they are not through lanes; and c) although the new noise regulations specify that an auxiliary lane is a Type 1 project, the new noise regulations do not take effect until July 2011.

The following is a summary of changes that have been made to the proposed Bridge V design:

1. In lieu of the previously proposed re-alignment into the median, I-95 will be maintained on its existing alignment through the Kendrick Street/Highland Ave. area, thereby resulting in a substantial reduction in wetland impacts (approx. 2 acres less). The added single travel lane along the existing alignment will be toward the median.
2. The Kendrick Street Interchange diamond proposed in the EA/FEIR to provide all movements was found on the east side of I-95 to provide failing levels of service. Two traffic movements have been eliminated: the left turn from I-95 northbound ramp to Kendrick Street westbound and the left turn from Kendrick Street eastbound to I-95 northbound.
3. More detailed design of the Kendrick Street Interchange revealed that a 5 to 6-foot high retaining wall and a 2:1 embankment would be required to avoid a residential structure at 249 Kendrick Street. Since this change would make the property dysfunctional and was cost prohibitive, MassDOT has completed the taking of the property.
4. A 12-foot auxiliary lane and increased shoulder width (from 6 to 10 feet) will be added in each direction between Route 9 and Highland Avenue interchanges to the outside of the existing shoulders. To minimize side slope impacts, retaining walls will be constructed.
5. As a result of the alignment change discussed in 1 above, another noise analysis was done that determined the Hunting and David Roads residential neighborhood on the west side of I-95 from Highland Avenue to south of Kendrick Street qualified for a noise barrier which has been added to the project..
6. The MBTA single railroad line over I-95 was in active service at the time of the EA, but that service has lapsed and its future use is not yet decided. The MBTA (owner of ROW) and Bay Colony Railroad (owner of rights for freight service) agreed that MassDOT would remove the existing railroad bridge as part of Bridge V and construct new pier foundations for a future bridge, avoiding excavation in the median when the new railroad bridge is built.
7. Bridge N-04-022, which carries I-95 over Central Avenue in Needham, was identified in 2006 on the "List of Nationally and Exceptionally Significant Features of the Federal Interstate Highway System" and is eligible for listing in the National Register. When initially reviewed under Section 106 in 1988, the bridge, constructed in 1953, was found "Conditionally Not Eligible" due to its age. The bridge consists of a pair of parallel, reinforced-concrete rigid frame structures separated by a 24-foot wide open well. The bridge will be substantially widened under the current proposal. Details of the proposed work are included in the Section 106 Notice of Project Change/Adverse Effect Finding dated June 23, 2010, which resulted in a signed Memorandum of Agreement. These documents are provided as Appendix A and B of the Programmatic Section 4(f) Evaluation for the Widening of the Central Avenue Bridge, which is also provided for your approval.
8. The Route 9 Interchange has been re-designed. Due to structural deficiencies noted since the EA/FEIR, the I-95 Bridges over Route 9 (W-13-023 2FQ and A7V) will be replaced. The I-95 alignment will be shifted to the east, retaining but improving the existing reverse curve alignment. The north and southbound barrels will be combined into a single structure increasing the clearance over Route 9 to 15'-0". The current cloverleaf configuration at the interchange will be changed to a partial cloverleaf. Two on-ramps will be eliminated (Route 9 WB to Route 128 SB and Route 9 EB to Route 128 NB) and replaced by two new signalized intersections, with some minor widening of Route 9 to accommodate the additional turning lanes. The other ramps will have minor alignment changes to improve geometry and safety.
9. The changes at the Route 9 Interchange will result in wetland resource impacts to a stream within the cloverleaf of approximately 3,076 sf of bordering vegetated wetland, along with 124 feet of bank and 582 sf of land under water.
10. Mitigation for approximate 1-acre Bridge V wetland impacts has not yet been finalized, although MassDOT is actively coordinating with the US Army Corps of Engineers and MADEP. Some off-site mitigation may be required and several locations being considered are within the 700-acre Cutler Park Reservation, which borders I-95 from Kendrick Street south to Great Plain Ave. MassDOT has informed the agencies about potential Section 4(f) impacts of these proposals, but no decisions will be made until later in 2011. At that time, MassDOT will consult with you regarding the appropriate Section 4(f) documentation to prepare if the agencies insist on wetland mitigation there.
11. Stormwater management measures are being updated to comply with the latest requirements, such as the TMDL for the Charles River.

One change has occurred in the ambient environment: the state Natural Heritage and Endangered Species Atlas now shows a small portion of the southern portion of the project as Priority Habitat of state-listed species, but not any federal species. An investigation of the area noted that habitat for both species – *Scirpus longii* (Long's Bulrush) and *Viola brittoniana* (Britton's Violet) – are outside the limits of the proposed construction.

In conclusion, MassDOT will implement all mitigation measures committed to in the EA and the Section 106 MOA, and will comply with any future permit conditions obtained for Bridge V. The proposed changes will receive public review through a Notice of Project Change filed with the Massachusetts Environmental Project Act Office in March 2011 and Bridge V will undergo review with the appropriate regulatory agencies through the permitting process.

In MassDOT's opinion, the proposed project changes are insignificant; consequently, we request your concurrence that the Finding of No Significant Impact remains valid for the project.

If you have any questions about the project, please contact Lawrence Cash, P.E., Project Manager, at 617-973-7384 or Lawrence.Cash@state.ma.us.

Sincerely,



Kevin M. Walsh
Director of Environmental Services

Cc: Damaris Santiago, FHWA Environmental Engineer
Lawrence Cash, P.E., MassDOT Project Manager
Diane Madden, Mass DOT, Environmental

Attachments:

Table 1 Contract Status

Programmatic Section 4(f) Evaluation for the Widening of the Central Avenue Bridge

Appendix A - Section 106 Notice of Project Change: Adverse Effect

Appendix B - Executed Memorandum of Agreement

TABLE 1
CONTRACT STATUS

Stage	Contract	Towns	Design Status	Construction Status
1	Bridge I	Canton/Dedham	Completed 2004	Substantial completion in Fall 2009
	Bridge II	Westwood	Completed 2004	Completed 2005
	Roadway I	Randolph to Westwood	Completed 2006	Completion anticipated in Fall 2011
2	Bridge III	Dedham/Westwood	Completed 2005	Substantial completion in Nov. 2010
	Bridge IV	Dedham/Needham/Westwood	Completed 2009	NTP issued May 2010; completion anticipated in 2015
3	Bridge V	Needham/Wellesley	25% under MassDOT review	Advertisement for construction anticipated July 2012, with construction completion anticipated in 2016.

Widening of the Central Avenue Bridge (Bridge N-04-022)

**Needham,
Massachusetts**

**Submitted pursuant to 49 USC 303
and 23 USC 138**

**Massachusetts Department of Transportation
Boston, Massachusetts
and
U.S. Department of Transportation
Federal Highway Administration
Cambridge, Massachusetts**

March 2011

PROGRAMMATIC SECTION 4(f) EVALUATION

Pursuant to Section 4(f) of the Department of Transportation Act of 1966,
49 USC 303 and 23 USC 138

Widening of the Central Avenue Bridge (Bridge N-04-022)

Based upon the attached information:

1. I have determined that the project meets the applicability criteria set forth in the PROGRAMMATIC SECTION 4(f) EVALUATION FOR FHWA PROJECTS THAT NECESSITATE THE USE OF HISTORIC BRIDGES.
2. I have determined that all alternatives set forth in the Findings section of the PROGRAMMATIC SECTION 4(F) EVALUATION FOR FHWA PROJECTS THAT NECESSITATE THE USE OF HISTORIC BRIDGES have been evaluated and that there are no feasible and prudent alternatives to the rehabilitation of Bridge N-04-022, I-95 over Central Avenue.
3. I have determined that the project complies with the Measure to Minimize Harm section of the PROGRAMMATIC SECTION 4(F) EVALUATION FOR FHWA PROJECTS THAT NECESSITATE THE USE OF HISTORIC BRIDGES and assure that these measures will be implemented.

Rick Marquis
Acting Division Administrator
Massachusetts Division
Federal Highway Administration

Date

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Widening of the Central Avenue Bridge (Bridge N-04-022)

This Programmatic Section 4(f) Evaluation has been prepared pursuant to Section 4(f) of the Department of Transportation Act of 1966, 49 USC 303 and 23 USC 138.

1.0 Introduction

The Massachusetts Department of Transportation – Highway Division (MassDOT) proposes to use federal funds to widen the Central Avenue Bridge (N-04-022), which carries Interstate 95 (I-95, also known as State Route 128) over Central Avenue in the Town of Needham. The widening of the Central Avenue Bridge is part of the larger I-95/I-93 (Route 128) Transportation Improvements Project initiated in 1985, which seeks to widen I-95 from a 3-lane cross section to a 4-lane cross section in both directions between Interchange 20 (Route 9) in Wellesley and Interchange 4 (Route 24) in Randolph. The 3-lane roadway cross section in this area was identified as early as 1985 as a congestion and safety problem which warranted action. As a result of these conditions, two immediate actions were taken by MassDOT, then known as the Massachusetts Department of Public Works. The first was to open the breakdown lane as a travel lane during peak periods with FHWA approval, and the second was to initiate the I-95/I-93 Add-a-Lane project.

The project has been reviewed and cleared under Section 106 of the National Historic Preservation Act in 1988, 1993, 1996, 2003, and 2005, in all cases as either having “No Effect” on historic properties or being exempt from further review under Appendix 1 of the 2004 Massachusetts Statewide Programmatic Agreement for Section 106. In 2006, the Central Avenue Bridge was included in the “List of Nationally and Exceptionally Significant Features of the Federal Interstate Highway System” and is, therefore, eligible for listing in the National Register and was excluded from the Interstate Highway System’s general Section 106 exemption.

2.0 Purpose and Need

The purpose and need of the overall I-95/I-93 Add-a-Lane project is to restore a functional breakdown lane in each direction of I-95 and I-93, to improve safety, to

relieve traffic congestion along the corridor, and to reduce the diversion of traffic to parallel routes.

Specifically, for the Bridge V portion of the project located within the Towns of Wellesley and Needham, including the Central Avenue Bridge, the purpose and need of the project is to:

- Alleviate existing traffic congestion; and
- Eliminate the safety issues associated with the allowable use of breakdown lanes during peak travel times.

3.0 Description of Project

The proposed project consists of the widening of the Central Avenue Bridge (Bridge N-04-022) to accommodate the construction of an additional travel lane in each direction. The bridge is located in Needham, and carries I-95 (Route 128) over Central Avenue. In 2006, the bridge was determined to be eligible for listing in the National Register and was excluded from the Interstate Highway System's general Section 106 exemption. The project location is shown on Figure 1.

3.1 Existing Conditions

Interstate 95 is a major continuous highway from Florida to Maine and is part of the Interstate Highway System. Within the project area, I-95 is a heavily traveled commuter route serving several major employment areas both within and immediately north and south of the project limits. Approximately 183,000 vehicles travel on I-95 each day in the northbound and southbound directions. In the project area, land use is a mix of residential and commercial properties. Approximately 0.2 miles to the east of the Central Avenue Bridge, Central Avenue crosses the Charles River.

The existing Central Avenue Bridge consists of a pair of parallel, reinforced-concrete rigid frame structures that are separated by a 24-foot open well. Both rigid frames are single-span structures, and were constructed in 1953. Each has an overall length of 56 feet (with a clear span of approximately 50 feet) and an out-to-out width of 60 feet. Each structure carries three 12-foot traffic lanes, an approximately 3-foot wide safety walk on the exterior side, and an approximately 2-foot wide safety walk along the median side.

The abutment wingwalls and the retaining walls of the median well are faced with broken-coursed granite ashlar veneer. Both superstructures carry original steel "Type B" bridge railings.

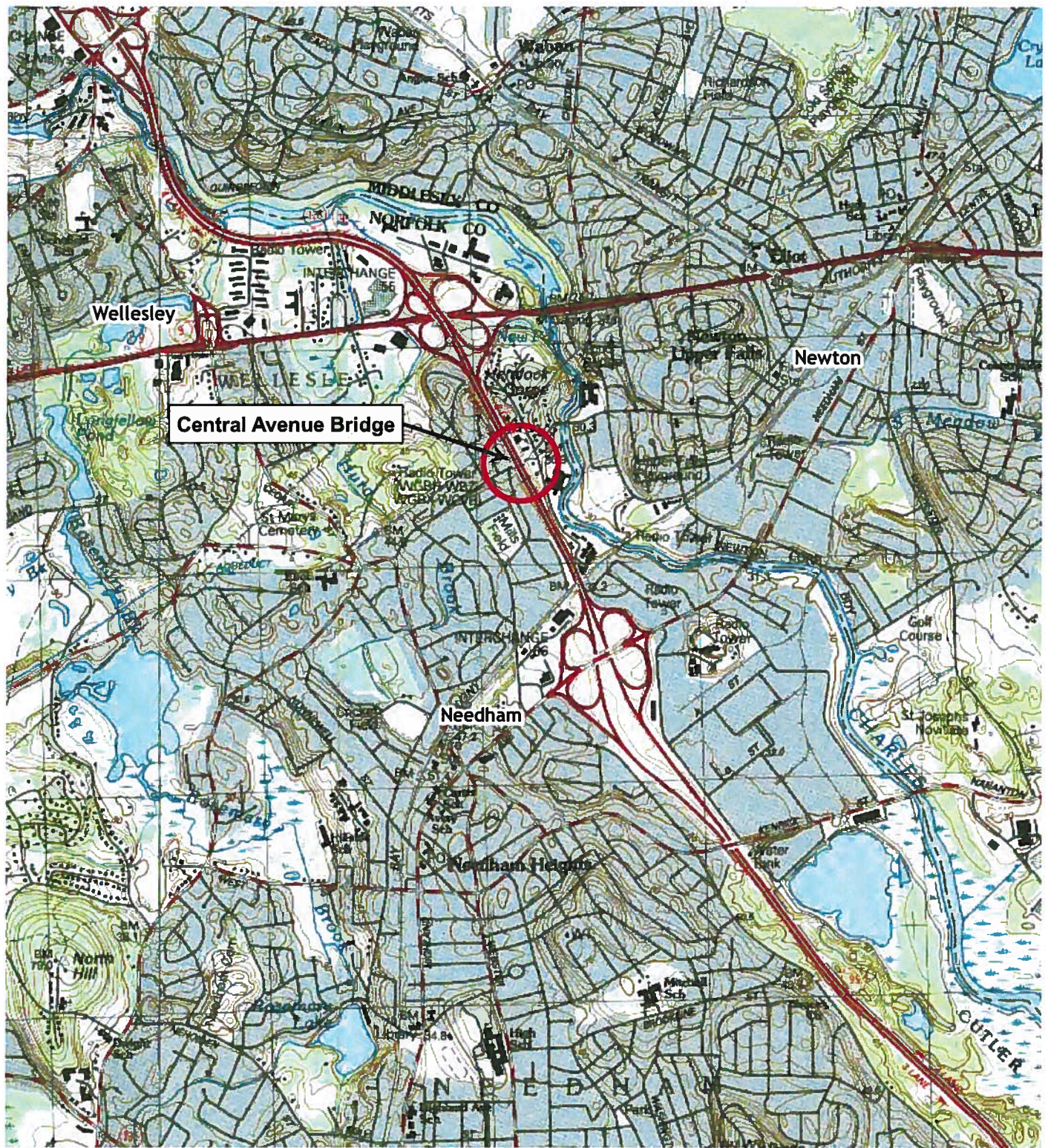


Figure 1
Site Location Map

Central Avenue Bridge
Needham, Massachusetts



Source: USGS

3.2 Proposed Project

The proposed project will involve the widening by approximately 7 feet of both the northbound and southbound structures of the Central Avenue Bridge. The project will extend both faces of the existing concrete rigid frame structures of the Central Avenue Bridge and requires the elimination of the currently open median well between the existing bridge structures. The original exterior appearances of the structures will be recreated on the new faces of the widened structure, utilizing re-used original facing stones and the refurbished steel bridge railings in combination with a re-created bull-nose concrete coping. The stone-faced retaining walls that flank the existing open median well will be removed, and this space will be filled by a new concrete rigid frame that will match the profiles of the existing frames.

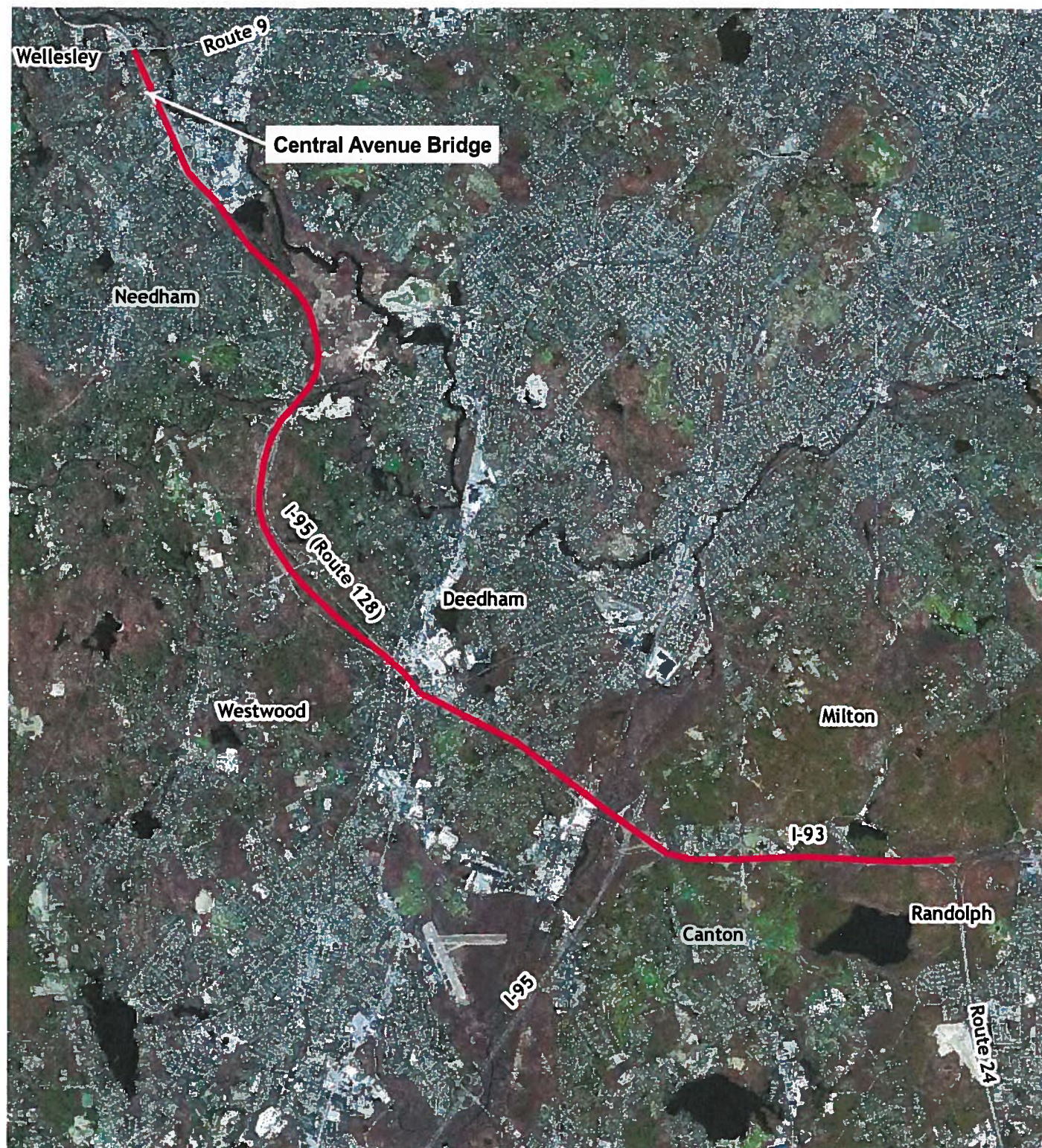
The widened bridge will carry four 12-foot wide travel lanes, an auxiliary lane and 10-foot wide outside shoulder in each direction, with a 2-foot wide traffic barrier separating the northbound and southbound roadways. Crash-tested concrete barriers will be constructed on the traffic sides of the re-erected steel railings on the widened bridge's outer faces. On the southbound side only, an 18-foot high concrete panel noise barrier will be installed between the new concrete crash barrier and the re-erected original steel railing.

The I-95/I-93 Transportation Improvement Project, including the project area shown on Figure 2, has been reviewed in conformance with the National Environmental Policy Act (NEPA) and the Massachusetts Environmental Policy Act (MEPA) Regulations. The review process has involved a scoping process, the publication of an Environmental Assessment/Draft Environmental Impact Report (EA/EIR), a public review process, and the publication of an EA/Final Environmental Impact Report (FEIR). Two Re-evaluations of the EA/Notices of Project Change (NPC) were submitted in 2002. This Programmatic Section 4(f) Evaluation is being submitted to FHWA along with the 2011 Re-Evaluation. It is anticipated that a NPC will be filed with the MEPA Office in March of 2011.

4.0 Programmatic Section 4(f) Applicability

Section 4(f) of the Department of Transportation (DOT) Act of 1966, as amended, specifies that: "The Secretary of DOT may approve a transportation program or project requiring the use of publically owned land of a park, recreation area, of wildlife or waterfowl refuge, or land of a historic site of National, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, recreation area, refuge, or site) only if:

1. There is no feasible and prudent alternative to using that land; and



 I-95/I-93 (Route 128)
Transportation Improvements Project



Figure 2
I-95/I-93 (Route 128)
Transportation Improvements Project

Wellesley to Randolph, Massachusetts



2. The program or project includes all possible planning to minimize harm to the park, recreation area, wildlife or waterfowl refuge, or historic site resulting from the use.

As part of administering this act, the Federal Highway Administration (FHWA) has prepared a Programmatic Section 4(f) Evaluation for certain federally-assisted highway projects affecting bridges that are on or eligible for inclusion on the National Register of Historic Places. The criteria that must be met to apply this programmatic evaluation and the proposed project's applicability are as follows:

The bridge is to be replaced or rehabilitated with Federal funds.

MassDOT proposes to use federal funds to widen Bridge N-04-022.

The project will require the use of a historic bridge structure that is on or eligible for listing on the National Register of Historic Places.

Bridge N-04-022 is included in the "List of Nationally and Exceptionally Significant Features of the Federal Interstate Highway System," and is eligible for listing in the National Register.

The bridge is not a National Historic Landmark.

Bridge N-04-022 is not listed as a National Historic Landmark.

The FHWA District Administrator determines that the facts of the project match the sections of the Programmatic Section 4(f) Evaluation for FHWA Projects that Necessitate the Use of Historic Bridges labeled Alternatives to Avoid Section 4(f) Property, Findings, and Mitigation.

This document has been prepared in compliance with the requirements of the FHWA Programmatic Section 4(f) Evaluation for FHWA Projects that Necessitate the Use of Historic Bridges. MassDOT considered four alternatives for the proposed project:

- No Build Alternative;
- Build on New Location Without Using Old Bridge Alternative;
- Rehabilitation Without Affecting the Historic Integrity of the Bridge Alternative; and
- Bridge Widening Alternative.

See Section 7.0 of this document for the alternatives analysis.

Agreement between the FHWA and the State Historic Preservation Officer (SHPO) has been reached through procedures pursuant to Section 106 of the National Historic Preservation Act (NHPA).

Pursuant to Section 106 of the NHPA, MassDOT has prepared appropriate documentation describing the project's unavoidable Adverse Effect on the National Register-eligible bridge. The documentation was forwarded to FHWA on June 23, 2010 (see Appendix A), with a request that FHWA forward it to the SHPO the Massachusetts Historical Commission. The Advisory Council on Historic Preservation has chosen not to participate in the consultation process pursuant to 36 CFR Section 800.6(a)(1)(iii).

A Memorandum of Agreement (MOA) has been prepared to outline mitigation of project's Adverse Effect to the bridge (see Appendix B). The MOA has been signed by MassDOT, FHWA, and the SHPO. The MOA's mitigation program includes the following:

- A historically sensitive design in widening Bridge N-04-022; and
- Standard Archival Documentation of Bridge N-04-022.

The details of the mitigation program are presented in Section 8.0, Measures to Minimize Harm.

5.0 Description of the Section 4(f) Resources

Bridge N-04-022 is eligible to be listed in the National Register. When initially reviewed for National Register eligibility in 1988, the Central Avenue Bridge (Bridge N-04-022) was found "Conditionally Not Eligible" due to its less-than-50-year age. In 2006, however, the bridge was one of three Massachusetts bridges included in the "List of Nationally and Exceptionally Significant Features of the Federal Interstate Highway System." The Central Avenue Bridge was thus determined to be eligible for listing in the National Register, and was excluded from the Interstate Highway System's general Section 106 exemption.

The Central Avenue Bridge was designed and built by the Massachusetts Department of Public Works (now MassDOT) to carry Boston's Southern Circumferential Highway (Route 128), the first limited-access circumferential highway in the United States, over a local road in Needham. It is one of the best-preserved surviving bridges dating from this early phase of the development of Route 128. It is a good example of a concrete rigid frame bridge type, which is not commonly found in Massachusetts. Its design is marked by a distinctive "Fifties Modern" aesthetic, evidenced by the astringent geometry of its stone-veneered substructure, its modestly ornamental steel bridge railings, and the

prominent bull-nose concrete coping that caps its stone-faced wingwalls and visually supports the open steel railings.

6.0 Impact on Section 4(f) Resources

The proposed project will have an unavoidable Adverse Effect on the National Register-eligible Central Avenue Bridge (Bridge N-04-022). The bridge is a good example of a structural type (concrete rigid frame) not commonly found in Massachusetts. It is one of the best-preserved surviving bridges dating to the development of Route 128, the first circumferential, limited-access highway in the United States. Elements of the bridge design that give its distinctive "Fifties Modern" aesthetic include the geometry of its stone-veneered substructure, the ornamental steel bridge railings, and the prominent bull-nose concrete coping.

The proposed bridge widening will require the extension, on both faces, of the existing concrete rigid frame structures of the Central Avenue Bridge, and the elimination of the currently open median well between the existing bridge structures. MassDOT Cultural Resources Unit (CRU) determined that the proposed project would have an unavoidable Adverse Effect on the National Register-eligible Central Avenue Bridge (see Appendix A).

The proposed work is confined to the existing bridge and roadway approaches, the steep bridge embankments and paved and graded areas associated with the original interstate construction. Little or no archaeological sensitivity is present in the project area based on the nature of the proposed work and the effects of previous bridge and interstate construction, and other development along Central Avenue.

7.0 Alternatives to Avoid Section 4(f) Resources

MassDOT explored alternatives that would avoid impact to Section 4(f) Resources. These alternatives include:

- The No Build Alternative;
- The Build on a New Location without Using the Old Bridge Alternative;
- The Rehabilitation without Affecting the Historic Integrity of the Bridge Alternative; and
- The Bridge Widening Alternative.

The results of the analysis of each of these alternatives are presented in the following section.

7.1 No Build Alternative

The No Build Alternative is not considered prudent because it would not meet the purpose and need of the project. The purpose of the I-95/I-93 (Route 128) Add-a-Lane project is to alleviate traffic congestion and eliminate the safety issues related to the allowed temporary use of the breakdown lanes during peak travel times. The overall purpose of the I-95/I-93 (Route 128) Add-a-Lane Project would be substantially diminished if the Central Avenue Bridge were allowed to remain at the present three lane width, while all other bridges on this stretch of I-95 (Route 128) were widened or replaced to carry four traffic lanes and a functional breakdown lane. The existing Central Avenue Bridge is not suitable for current and future traffic demands, and the constriction of traffic at the Central Avenue Bridge (if the No Build Alternative is chosen) would not alleviate traffic congestion in the project corridor.

7.2 Build on a New Location Without Using the Old Bridge Alternative

The Build on a New Location Without Using the Old Bridge Alternative is not considered to be a feasible or prudent alternative. This alternative would require a significant relocation of I-95 either to the east or west.

Relocating to the east would require the taking of numerous commercial and residential properties in order to construct a new bridge that will support I-95 (Route 128) as proposed. Relocation to the east would also require reconfiguring or spanning the intersection of Reservoir Street and Central Avenue.

Relocating I-95 to the west would require the taking of dozens of residential properties and would severely impact two residential roadways adjacent to I-95 (Central Avenue, River Park Street and potentially Central Terrace). These actions would cause severe social, economic, and possibly environmental impacts, as well as severe disruption to the established communities in the area.

For the reasons stated above, the Build on a New Location Without Using the Old Bridge Alternative is not considered feasible and prudent and has been dismissed. There is no space to the east or the west to construct a new bridge and new interstate approaches without significant land acquisition. The Build on a New Location Without Using the Old Bridge Alternative is not prudent because of the extraordinary social, economic and environmental disruption building on a new location would cause in the project area.

7.3 Rehabilitation Without Affecting the Historic Integrity of the Bridge Alternative

The Rehabilitation without Affecting the Historic Integrity of the Bridge Alternative does not meet the project Purpose and Need as it does not incorporate widening

I-95/I-93 (Route 128), which is the focus of the current project. The Rehabilitation without Affecting the Historic Integrity of the Bridge Alternative is not feasible or prudent. Improvements to the existing Central Avenue Bridge are proposed not because the bridge is structurally deficient, but because it does not have sufficient through-traffic lanes to support current and future traffic demand. The purpose of the project is to increase capacity along I-95 (Route 128) by adding one lane of traffic in each direction and eliminating the safety issues associated with the temporary allowed use of breakdown lanes during peak travel times.

Several variations of this alternative were considered by MassDOT but were dismissed because, although they would retain some historic integrity, these alternative variations would not meet the overall project Purpose and Need. The alternative variations are described below.

- MassDOT explored the possibility of widening the Central Avenue Bridge only into the open-well median which would leave the two 1953 structures' original outer faces intact. This variation was ultimately eliminated due to safety concerns. The median-only widening would not allow sufficient width for adequate breakdown lanes on the bridge, resulting in a hazardous "neck-down" situation as the highway passes over it. A "neck-down" is where the width of the paved surface of the highway decreases; in this case, the width of the highway approach to the bridge is wider, then constricts as it crosses the bridge, and widens again after the bridge. This would create an unacceptable safety hazard on an interstate highway.
- The possibility of preserving the original stone-faced retaining walls that flank the median well was explored by MassDOT. The retaining walls could not be preserved and could not support a roadway structure because the walls are stepped back from the legs of the two rigid frames, are battered backwards, and are structurally inadequate for carrying vehicular loads. Additionally, the retention of the retaining walls would have required the use of a structural type other than concrete rigid frame to span the Central Avenue Bridge in the former median. Longitudinal joints would have to be used to join the different structural types which would create problems with differential rates of expansion and flexure.
- The possibility of reusing some of the existing stone veneer to face the extended bridge's new concrete rigid frame legs was considered, but eventually rejected in order to avoid creating an appearance that never actually existed.

Increasing capacity and eliminating safety issues associated with the use of the breakdown lane on I-95 (Route 128) in the project area – the project purpose and need - would require widening of the Central Avenue Bridge. Increasing capacity without widening the bridge is not possible. Widening the bridge will require dismantling portions of the bridge, affecting the historic integrity of the bridge, resulting in an Adverse Effect.

For the reasons stated above, the Rehabilitation Without Affecting the Historic Integrity of the Bridge Alternative is not considered feasible and prudent and has been dismissed.

7.4 Bridge Widening Alternative

The Bridge Widening Alternative is a prudent and feasible alternative and is the preferred alternative. The Bridge Widening Alternative requires the extension, on both faces, of the existing concrete rigid frame structures of the Central Avenue Bridge, and the elimination of the currently open median well between the existing bridge structures. The 7-foot extension on each face would accommodate four 12-foot travel lanes, an auxiliary lane and a 10-foot wide outside shoulder in each direction with 2-foot traffic barrier separating the northbound and southbound lanes. This alternative preserves the two 1953 rigid frame structures, and re-creates most of their original architectural appearance. The original steel bridge railing and granite veneer stones would be reused to face new concrete extensions of the same structural type. This was the most prudent and feasible means to respect the historic engineering and architectural character of the original bridge.

Ultimately, MassDOT staff and the project's designers concluded that the bridges needed to be widened on both sides (by closing the median, and expanding on the outer faces) to accommodate the design speed and volume of traffic on I-95 (Route 128). The Bridge Widening Alternative is the only alternative that meets the Purpose and Need of the project; alleviating congestion in the project corridor and restoring the functional breakdown lane.

8.0 Measures to Minimize Harm

MassDOT proposes to mitigate the Adverse Effect on the Central Avenue Bridge (Bridge N-04-022) through use of a historically sensitive design and standard photographic recordation of the bridge. The adverse effect on the bridge is due to the significant widening of the bridge to accommodate an additional lane in each direction on I-95 (Route 128). Bridge N-04-022 is a good example of a concrete rigid frame structural type not commonly found in Massachusetts and the design is marked by a distinctive "Fifties Modern" aesthetic. The mitigation commitments are outlined in the MOA included in Appendix B.

MassDOT has taken care to widen the bridge with a historically sensitive design. The concrete rigid frames of the two existing structures will be retained. The proposed extensions that will join and widen them will utilize the same structural system and have the same gently arched profile as the existing pair of bridges. The exterior faces of the proposed, extended structure will be designed to recreate the character-defining elements of the historic bridge. Salvaged, existing metal bridge railings and

elements of the stone veneer will be re-erected as the outer faces of the extended bridge. The distinctive bull-nose profile of the existing concrete coping that caps the veneered walls will be replicated. Any new materials that cannot be salvaged and reused will match the original materials as closely as is feasible.

Standard archival documentation of Bridge N-04-022 will be prepared in the form of 35mm five inch by seven inch black and white archival-quality prints on archival-quality photographic paper, accompanied by the negatives. The photographs must include, but are not limited to, views of the bridge's elevations, wingwalls, retaining walls, railings, and the stone-faced, open median area between the bridge structures. The photographic documentation must be completed before construction begins. One set of photographic documentation must be provided to MHC for transmittal to the Massachusetts State Archives and another set of photographic documentation must be provided to the Needham Historical Commission. All paper documentation shall be enclosed in an archival-quality file folder. Each set of documentation, including photographs, shall be enclosed in a suitably sized archival-quality box (e.g., 12 inches by 11 inches by 2 inches).

9.0 Coordination with Public Officials

In compliance with Section 106 of the National Historic Preservation Act, MassDOT has coordinated with the FHWA, the MHC, and the Needham Historical Commission. MassDOT, the FHWA and the MHC entered into a Memorandum of Agreement (MOA). The MOA was signed by all parties in December 2010 and a copy is included in Appendix B.

The Needham Historical Commission did not respond to requests for participation. The Needham Historical Commission was originally notified of the proposed project in March 1999. A second letter explaining the project changes (including the filling of the open median and the exterior widening of each bridge) was sent in January 2010. No response from the Needham Historical Commission has been received to date.

10.0 Findings

Based on the above consideration, there are no prudent and feasible alternatives to the widening of Bridge N-04-022. The proposed action includes all possible planning to minimize harm to the bridge.

MassDOT examined several project alternatives including the No Build Alternative, the Build on a New Location without Using the Old Bridge Alternative, the Rehabilitation without Affecting the Historic Integrity of the Bridge Alternative, and the Bridge Widening Alternative. The Bridge Widening Alternative would accommodate the additional lanes in both directions as part of the currently ongoing

I-95/I-93 (Route 128) Add-a-Lane project between Wellesley and Randolph. The Bridge Widening Alternative would not entail adverse social, economic, or environmental effects beyond those to the existing bridge.

MassDOT proposes to minimize the adverse effect of widening Bridge N-04-022 with the completion of the mitigation measures outlined in a MOA between MassDOT, FHWA, and the Massachusetts SHPO.

Appendix A

Section 106 Notice of Project Change: Adverse Effect



DEVAL L. PATRICK
GOVERNOR

TIMOTHY P. MURRAY
LT. GOVERNOR

JEFFREY B. MULLAN
SECRETARY & CEO

Moving Massachusetts Forward.
massDOT

Massachusetts Department of Transportation

June 23, 2010

**RE: Needham/Wellesley, I-95 (ST 128) Add-a-Lane Project (Bridge V Contract)
(MHD #603711) (MHC # 9112)
Section 106 Notice of Project Change: Adverse Effect**

Ms. Lucy Garliauskas
Division Administrator
Federal Highway Administration
55 Broadway, 10th Floor
Cambridge, Massachusetts 02142

Attn: Damaris Santiago

Dear Ms. Garliauskas:

The Massachusetts Department of Transportation, Highway Division (MassDOT) proposes to use federal funds to construct an additional lane in each direction and make other improvements to the section of I-95 (ST 128) between Wellesley and Randolph. This project, or portions of it, have been reviewed and cleared under Section 106 of the National Historic Preservation Act of 1966, as amended, in 1988, 1993, 1996, 2003 and 2005, in all cases as either having "No Effect" on historic properties, or being exempt from further review under Appendix 1 of the 2004 Massachusetts Statewide Programmatic Agreement for Section 106 (PA).

Several significant changes have occurred since this project was last reviewed and cleared under Section 106. In 2006, one bridge that previously had been found "Conditionally Not Eligible" for National Register (NR) listing (Bridge N-04-022, the Central Avenue Bridge in Needham) was determined eligible under the Interstate Highway System Exemption agreement. Bridge N-04-022 will be significantly widened under this project. Additionally, further development of the interchange design at Kendrick Street in Needham now requires the demolition of one single-family residence. Finally, two additional sliver takings are now proposed to accommodate retaining wall construction along an on-ramp in Needham. Accordingly, MassDOT's Cultural Resources Unit (CRU) staff has reviewed the revised aspects of the project under the terms of the Section 106 PA and has determined that the revised project will have an unavoidable Adverse Effect on the NR-eligible Central Avenue Bridge, but will have no other effects on National Register-listed or -eligible historic or archaeological resources. The results of the review are provided below.

Bridge N-04-022

Bridge N-04-022, which carries I-95 (ST 128) over Central Avenue in Needham, consists of a pair of parallel, reinforced-concrete rigid frame structures separated by a 24'-wide open well. Both rigid frames are single-span structures constructed in 1953; each has an overall length of

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56' (with a clear span of 50' 3") and an out-to-out width of 60'. Each structure carries three 12'-wide traffic lanes, a 2' 9" safety walk on the exterior side and a 2' 3" safety walk along the median side. The concrete frames follow the typical, fully developed rigid frame format, with rounded knees, tapered legs, and gently arched soffits. The abutment wingwalls and the retaining walls of the median well are faced with broken-coursed granite ashlar veneer; both superstructures carry original steel "Type B" bridge railings.

The Central Avenue Bridge was designed and built by the Massachusetts Department of Public Works to carry Boston's Southern Circumferential Highway (ST 128), the first limited-access circumferential highway in the United States, over a local road in Needham. It is one of the best-preserved surviving bridges dating from this phase of the development of Route 128; it is a very good example of a structural type (concrete rigid frame) not commonly found in Massachusetts; and its design is marked by a distinctive 'Fifties Modern' aesthetic, evidenced by the astringent geometry of its stone-veneered substructure, its modestly ornamental steel bridge railings, and the prominent bull-nose concrete coping that caps its stone-faced wingwalls and visually supports the open steel railings.

When initially reviewed for National Register eligibility in 1988, the Central Avenue Bridge was found "Conditionally Not Eligible" due to its then less-than-50-year age. In 2006, however, the Central Avenue Bridge was one of three Massachusetts bridges included in the "List of Nationally and Exceptionally Significant Features of the Federal Interstate Highway System." The Central Avenue Bridge was thus determined to be eligible for listing in the National Register and was excluded from the Interstate Highway System's general Section 106 exemption.

Project Impacts on Bridge N-04-022

The proposed project will involve the extension, on both faces, of the existing concrete rigid frame structures of the Central Avenue Bridge, and the elimination of the currently open median well between the existing bridge structures. Both original structures will be extended outward by approximately 7'; their original exterior appearances will be recreated on the new faces of the widened structure, utilizing re-used original facing stones and the refurbished steel bridge railings in combination with a recreated bull-nose concrete coping. The stone-faced retaining walls that flank the existing open median well will be removed, and this space will be filled by a new concrete rigid frame that will match the profiles of the existing frames. The widened bridge will carry four 12' travel lanes, an auxiliary lane, and a 10'-wide outside shoulder in each direction, with a 2'-wide traffic barrier separating the northbound (NB) and southbound (SB) roadways. Crash-tested concrete barriers will be constructed on the traffic sides of the re-erected steel railings on the widened bridge's outer faces. On the southbound barrel, only, an 18'-high concrete panel noise barrier will be installed between the new concrete crash barrier and the re-erected original steel railing.

Numerous alternatives that might avoid or minimize the proposed project's effects on the Central Avenue Bridge have been explored, but were eventually eliminated.

- The "do nothing" option was dropped early on, as the primary purpose of the whole Add-a-Lane project would be defeated if the Central Avenue Bridge(s) were allowed to remain

at their present, three-lane widths while all other bridges on this stretch of I-95 (ST 128) are widened or replaced to carry four traffic lanes.

- The possibility of widening the Central Avenue Bridge *only* into the median, leaving the 1953 structures' original outer faces intact, was explored but finally eliminated due to safety concerns - a median-only widening would not have allowed sufficient width for adequate break-down lanes on the bridge, resulting in a hazardous "neck-down" situation as the highway passes over it. This would create an unacceptable safety hazard on an Interstate highway.
- The possibility of preserving the original stone-faced retaining walls that flank the median well was explored, but the fact that these walls are stepped back from the legs of the two rigid frames, are battered backwards, and are structurally inadequate for carrying vehicular loadings, meant that these walls could not be used to support a new in-fill roadway superstructure. Moreover, retention of these retaining walls would have required the use of a structural type *other than* a concrete rigid frame to span Central Avenue in the former median. The use of two different structural types in a single, widened bridge would have resulted in longitudinal joints between the two structural systems under a travel lane, creating problems with differential rates of expansion and flexure.
- The possibility of reusing some of the existing stone veneer to face the extended bridge's new concrete rigid frame legs (either in the former median or on the new extensions) was considered but, in the end, rejected, in order to avoid creating an appearance that had never actually existed.
- The possibility of leaving a gap in the new concrete panel noise barrier as it passes over the bridge was explored but eliminated, as the creation of such a gap would drastically reduce the barrier's effectiveness. The use of a clear material for the sections of the barrier over the bridge was also investigated, but finally decided against, due to concerns regarding the long-term performance and maintenance of a clear barrier so close to the edge of an Interstate highway.

Ultimately, MassDOT staff and the project's designers concluded that the preservation of the two 1953 rigid frame structures and the recreation of most of their original architectural appearance (re-using their original steel bridge railing and granite veneer stones) to face new concrete extensions of the same structural type, was the most prudent and feasible means to respect the historic engineering and architectural character of the original bridge.

Proposed Demolition of 249 Kendrick Street

The proposed new diamond interchange and collector/distributor roadway system at Kendrick Street in Needham will require minor takings on the eastern side of I-95 (ST 128) (these takings were already cleared under the SHPO's concurrence with our No Effect letter of January 4, 1993) plus a larger taking on the northwestern quadrant of the interchange to accommodate construction of a new SB off-ramp and the widening and raising of Kendrick Street. The

changes to Kendrick Street are such that they will eliminate safe access to an existing single-family residence at 249 Kendrick Street. The decision has been made, therefore, to take the entire property and demolish the existing building. The house (see attached MHC Inventory Form B prepared by CRU staff) is a typical single-story "ranch" of no architectural distinction and no known historical associations, constructed in 1970. MassDOT's CRU staff has determined that the building is not eligible for individual listing in the National Register, nor is there any conceivable National Register-eligible district in this area to which it could contribute.

Additional Takings

Two additional sliver takings (one of 49 sq. ft., one of 157 sq. ft.) are now proposed on the eastern side of I-95 (ST 128) NB just south of the MBTA commuter rail bridge (N-04-020) near the ends of Fremont and Franklin Streets in Needham. These takings will be from the edge of a paved parking area sandwiched between a mid-20th-century manufacturing building (32 Fremont Street) and the top of the existing cut slope of the Interstate Highway layout. The Fremont Street building, a 1953 structure that includes a brick-faced two-story office block set into the corner of a single-story concrete block manufacturing plant/warehouse, does not appear to possess sufficient architectural character or historical associations to qualify for individual listing in the National Register. In the opinion of MassDOT's Archaeological Resources Supervisor, John E. Rempelakis, the two tiny slivers of land being taken have no archaeological potential based on disturbances associated with the construction of the Interstate Highway and adjacent modern industrial/office development.

Coordination with Local Historical Commissions / THPOs

The Needham Historical Commission was originally notified of the proposed project in March of 1999. A second letter, detailing project changes (including the filling of the open median, and the exterior widening of each bridge) was sent by the design consultant on behalf of MassDOT on January 5, 2010. No response from the Needham Historical Commission to either notification has been received to date.

The project area does not fall within the recognized ancestral homelands of any federally recognized American Indian tribe.

Project Effects

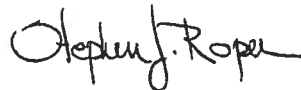
The post-2005 changes to the proposed I-95 (ST 128) Add-a-Lane Project (Bridge V Contract) will have an unavoidable Adverse Effect on the only identified National Register-listed or -eligible property within the project area – the Central Avenue Bridge – by extending the two original structures on each of their original faces, and joining them together over the original median well to create a much longer single structure. A conscientious study of possible alternatives has discovered no reasonable means to avoid this adverse effect.

In order to mitigate the adverse effects to the Central Avenue Bridge, its proposed extensions have been designed with sensitivity to the 1953 bridge's original structural and architectural character. The new extensions will be of the same concrete rigid frame structural type as the two

existing structures, and will match the originals in span length, height, and in their gently arched soffit profiles. The granite ashlar facing of the existing wingwalls will be salvaged and re-erected to face the wingwalls of the new outer extensions; the bull-nosed concrete coping on the existing fascia will be replicated to cap the new stone-faced wingwalls and to visually support the refurbished and re-used original steel bridge railings.

MassDOT has developed a draft Memorandum of Agreement (MOA) stipulating that the project impacts be mitigated by the historically sensitive design of the proposed new bridge extensions, and by the production of archival-quality photographic documentation of the existing bridge prior to its replacement. If you concur with MassDOT's **Adverse Effect** finding for the changes to the **Needham/Wellesley, I-95 (ST 128) Add-a-Lane Project (Bridge V Contract)**, and find the stipulations proposed in the draft MOA acceptable, please forward this letter and its accompanying documentation to the MA SHPO for her review and comment in compliance with Section 106. A second package of documentation, to be forwarded to the Advisory Council on Historic Preservation, has also been included. If you should have any questions regarding this material, please feel free to call either Kate Neuner (617.973.8287) or me (617.973.7492).

Sincerely,



Stephen J. Roper
Historic Resources Supervisor
Environmental Services

encs: N-04-022 sketch plans, photo sheets
249 Kendrick St., MHC Inventory Form B
249 Kendrick St. right-of-way plan
sliver takings, right-of-way plan
sliver takings, aerial photo
32 Fremont St., assessors' sheet
draft MOA
packages for MA SHPO & ACHP

ccs: Needham HC (w/o encs)
P. Nardone, MassDOT (w/o encs)

Appendix B

Memorandum of Agreement

**MEMORANDUM OF AGREEMENT
BETWEEN THE FEDERAL HIGHWAY ADMINISTRATION AND
THE MASSACHUSETTS STATE HISTORIC PRESERVATION OFFICER
REGARDING THE
EXTENSION/REHABILITATION OF THE CENTRAL AVENUE BRIDGE
AS PART OF THE I-95 (ST 128) ADD-A-LANE PROJECT
(BRIDGE V CONTRACT)
IN NEEDHAM, MASSACHUSETTS**

WHEREAS, the Federal Highway Administration (FHWA), in consultation with the Massachusetts State Historic Preservation Officer (SHPO), pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act of 1966, as amended [16 U.S.C. Part 470(f)], has determined that the extension/rehabilitation of the Central Avenue Bridge (Bridge N-04-022), in Needham, Norfolk County, Massachusetts will have an adverse effect upon the Central Avenue Bridge, which has been determined to be eligible for listing in the National Register of Historic Places; and

WHEREAS, the FHWA has defined the undertaking's area of potential effect (APE) as all areas within 50' of the bridge; and

WHEREAS, the Massachusetts Department of Transportation (MassDOT) has participated in the consultation process and has been invited to sign this Memorandum of Agreement (MOA) as an invited signatory; and

WHEREAS, the Needham Historical Commission has not responded to a detailed request for comments on the undertaking, solicited by MassDOT's design consultant in a letter dated January 5, 2010; and

WHEREAS, the area of potential effect is not within the ancestral homelands of any federally recognized American Indian tribe; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), FHWA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii);

NOW, THEREFORE, FHWA and the SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effects of the proposed undertaking on historic properties.

STIPULATIONS

FHWA shall ensure that MassDOT carries out the following measures:

I. HISTORICALLY SENSITIVE DESIGN

- A. The concrete rigid frames of the two existing structures will be retained; the proposed extensions that will join and widen them will utilize the same structural system and have the same gently arched soffit profile as the existing.
- B. The exterior faces of the proposed, extended structure will be designed to recreate the character-defining elements of the existing historic bridge. Salvaged, existing metal bridge railings and elements of the existing stone veneer will be re-erected as the outer faces of the extended bridge, and the distinctive, bull-nosed profile of the existing concrete coping that caps the veneered walls will be replicated. Any new materials required as substitutes for stones or railings that cannot be salvaged shall match the original materials as closely as is feasible.

II. ARCHIVAL DOCUMENTATION

- A. Archival photographic documentation shall be prepared in the form of 35mm 5" x 7" black and white archival-quality prints on archival-quality photographic paper, accompanied by negatives. All photographs shall be identified on the back in pencil, with no affixed labels, unmounted but sleeved in archival-quality, unbuffered envelopes, the contents of each envelope identified and numbered in pencil on the envelope. The negatives shall be sleeved in a stable polypropylene negative holder; the negative holder shall be suitably labeled. All photographs shall be keyed by number to a site plan printed on archival-quality paper.
- B. Photographs shall include, but not be limited to, views of the bridge's elevations, wingwalls, retaining wall, railings, and the stone-faced, open median area between the bridge structures.
- C. MassDOT shall ensure that all photographic documentation described in Subsections A and B is completed prior to the commencement of construction on the Central Avenue Bridge. MassDOT shall submit one original set of the paper and photographic documentation (with negatives) to the SHPO for subsequent transmittal to the Massachusetts State Archives and one original set (without negatives) to the Needham Historical Commission for transmittal to an appropriate local repository. All paper documentation described in Sections A and B shall be enclosed in an archival-quality file folder. Each set of documentation, including photographs, shall be enclosed in a suitably sized archival-quality box (e.g. 12" x 11" x 2").

III. DURATION

This MOA will be null and void if its terms are not carried out within five (5) years from the date of its execution. Prior to such time, FHWA may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with 36 CFR § 800.6(c)(7).

IV. DISPUTE RESOLUTION

Should any signatory or concurring party to this MOA object in writing to any actions proposed or the manner in which the terms of this MOA are implemented, FHWA shall consult with such party to resolve the objection. If FHWA determines that such objection cannot be resolved, FHWA will:

- A. Forward all documentation relevant to the dispute, including the FHWA's proposed resolution, to the ACHP. The ACHP shall provide FHWA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FHWA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. FHWA will then proceed according to its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, FHWA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FHWA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and provide them and the ACHP with a copy of such written response.
- C. FHWA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

V. TERMINATION

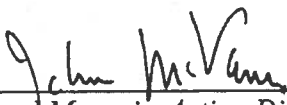
If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per 36 CFR § 800.6(c)(7). If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, FHWA must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. FHWA shall notify the signatories as to the course of action it will pursue.

Execution of this MOA by FHWA and the SHPO and implementation of its terms evidence that FHWA has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATORIES:

FEDERAL HIGHWAY ADMINISTRATION

By:  Date: 12/14/2010
Richard Marquis, Acting Division Administrator

MASSACHUSETTS STATE HISTORIC PRESERVATION OFFICER

By:  Date: 12/9/10
Brona Simon, Massachusetts State Historic Preservation Officer

INVITED SIGNATORY:

MASSACHUSETTS DEPARTMENT OF TRANSPORTATION

By:  Date: 12/15/10
Luisa Paiewonsky, Administrator, Highway Division