



15 State Street, Suite 1100
Boston, MA 02109
617.223.8671
bostonharbornow.org

September 11, 2018

Via email: Purvi.Patel@state.ma.us

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs
Attn: Purvi Patel, MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Long Island Bridge Notice of Project Change, EEA# 15308

Dear Ms. Patel,

Thank you for the opportunity to comment on the Notice of Project Change (NPC) for the Long Island Bridge superstructure replacement project.

This has been a complex and technical project that has undergone several revisions and modifications. We applaud the close collaboration between federal and state agencies, the City of Boston, consultants, and contractors to identify and address critical issues in the reconstruction of the Long Island bridge. Their cooperation has contributed to an expeditious permitting process.

Boston Harbor Now is the non-profit partner of the Boston Harbor Islands Partnership and works in concert with its municipal, state, federal, and non-profit partners to plan, activate, and advocate for Boston Harbor and its islands and waterfront. Our comments for the Notice of Project Change are focused on the following:

- Ensuring the proposed structure is climate-resilient for its entire design life
- Long Island in the context of the larger Boston Harbor Islands National and State Park

Ensuring the proposed structure is climate-resilient for its entire design life. The NPC includes information about climate-resilient bridge design measures. Boston Harbor Now strongly supports the inclusion of resilient design strategies in the Long Island bridge replacement project and sees this as necessary for the long-term health and safety of all future users of Long Island.

As described in Section 2.1 of the NPC, the proposed replacement will elevate the existing bridge caps by 2 feet from 11.5 to a final elevation of 13.5 feet and improve the steel coating to combat exposure to saltwater.

Climate Ready Boston (2016) indicates that if we fail to reduce GHG emissions, Boston can expect about 2.4 to 7.4 feet of sea level rise by 2100. Given the following:

- The analysis completed by Climate Ready Boston,
- MassDOT's climate modeling work,
- The Boston Planning and Development Agency's initiative to develop a 40-inch sea level rise overlay district for Boston, and
- The fact that most of the inner harbor is designed for 14 feet NAVD with some areas designing for 16 feet

the current proposal to elevate the bridge 24 inches seems insufficient—especially since the Long Island area will experience greater wave energy than Boston's inner harbor.

Based on the information provided, we are unable to conclude if the current measures will ensure the bridge is climate-resilient well into the latter half of the century. It is more important to understand the expected useful life of the bridge and the elevation necessary to withstand future sea level rise than it is to compare the proposed elevation to tidal records set by previous blizzards.

Long Island in the context of the larger Boston Harbor Islands National and State Park. A key component of Boston Harbor Now's mission is to facilitate and increase public access to Boston Harbor and the Islands. Research on public health and open space has found that green environments have a direct link to increased physical and mental health of our communities. As cities continue to develop and grow, the preservation of open space as a matter of public health becomes increasingly clear—especially in dense urban environments like Boston.

As we contemplate the future uses of Long Island and its facilities, we should recognize Long Island as the largest island in the Boston Harbor Islands National Park Area. The Islands and Harbor together represent 34,000 acres of public blue and green open space in the Greater Boston Region and as such serve as a major public health resource for over 3.5 million residents and millions of visitors. It is exciting to contemplate the impact that Long Island, the Park and the Harbor have on the public and economic health of our region.

As strong advocates for improved and expanded water transportation within Boston Harbor, we appreciate the City's consideration of ferry service as a possible alternative. For a number of reasons, the City does not favor ferry service as a viable option for sole access to Long Island. We assume that the appropriate stakeholders, such as the marine units for the Boston Police and Boston Fire Departments, were consulted prior to the City's final decision to abandon ferry service as the sole access to Long Island.

Given the City's commitment to replacing the bridge, we strongly recommend exploring the important role Long Island can play for the residents as well as the clients of the Recovery Center and to think of all of the islands as resources for the clients of Center as well as the general public.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Valdes Horwood". The signature is fluid and cursive, with a prominent horizontal stroke at the beginning.

Jill Valdes Horwood
Director of Policy