



May 14, 2019

Page Czepiga, Environmental Analyst
Secretary of Energy & Environmental Affairs
100 Cambridge St., Suite 900
Boston, MA 02114

Attention: MEPA Office, reference Mystic River Crossing
By Email: Page.czepiga@mass.gov

Dear Page,

Thank you for the opportunity to comment on the Mystic River Pedestrian and Bicycle Crossing. We enthusiastically support this important infrastructure project and commend Encore Boston Harbor and DCR for their efforts to move towards implementation. Mystic River communities have been waiting for over a decade for this connection – we're grateful to have these partners to turn ideas into reality.

The Mystic River Watershed Association (MyRWA) is a non-profit organization dedicated to the preservation and enhancement of the Mystic River watershed. This includes working to improve the water quality in the Mystic River and its tributaries and promoting public access through the formation of continuous greenways for recreation and transportation. We believe that these efforts will improve public health, the environment, and economy of Mystic River communities.

We would like to thank Encore Boston Harbor for providing the funding and project management capacity to move this through design and permitting. Given this investment — and a commitment to providing a significant amount towards the capital cost — we would **urge the state allocate funding to leverage this private investment**. Public-private partnerships are critical in funding this type of infrastructure. As Dante Ramos stated in his Boston Globe article from February 23, 2018:

“Even as everyone pays lip service to the need for carbon-free transportation — and even as we enjoy the fruits of past investments on the Charles River Esplanade and elsewhere — we're treating tomorrow's green infrastructure like an optional frill, to be funded by voluntary contributions from rich abutters.”

The proposed pedestrian and bike bridge will **provide a much-needed connection between Somerville and Everett, help to complete the 25-mile Mystic Greenways network, connect dozens of North Shore cities with downtown Boston, and close a critical gap in the 3,000-mile East Coast Greenway**. This bridge will also:

- Leverage the state's investment in the Northern Strand: this bridge will connect residents of Lynn, Saugus, Revere, Malden, and Everett to Somerville, Boston and Cambridge. Without this bridge, the Northern Strand will dead-end at the Mystic River.
- Unlock high-capacity transit access to the Orange Line and promote walking and biking, thus reducing automobile trips and vehicular traffic.

- Connect Somerville's recently rebuilt Sylvester Baxter Park, planned Draw 7 Park Redesign and the in-progress path along the MBTA seawall to the new parks and paths along Everett's waterfront.

The Lower Mystic Regional Working Group — required by the casino's MEPA certificate to address traffic impacts — released a report in spring 2019 further emphasizing the need for this bridge:

- "The Lower Mystic area is one of Massachusetts' biggest growth centers. Planned residential and commercial growth could lead to 27,000 new households and 55,000 new jobs in the study area (Everett, Somerville, Charlestown). Collectively, this future growth could meet 5% of the state's housing needs and accommodate 20% of projected statewide employment from 2010-2040, but not without challenges. That much growth could add almost 500,000 new daily trips to and from the study area by 2040 (a 34% increase from 2010), straining the transportation system."
- Two key recommendations of the report: (1) Continue to develop the regional active transportation network with bicycle lanes and pedestrian paths and bridges and; (2) Transit improvements should be complemented by additional road and path improvements

Beyond emphasizing the need for this bridge, we have **four main points to address**:

- (1) **Need for an expanded width, from 12 feet to 14 feet**, to meet safety standards given projected use;
- (2) **Need for the bridge to be complemented by a headhouse retrofit at the Assembly Row T** to connect users to transit;
- (3) **Compensatory mitigation should be applied locally**, not into the in-lieu fee program and;
- (4) **Need for a public meeting as part of the Chapter 91 permitting process.**

Expanded Bridge Width

We are disappointed to see that the bridge width has been reduced from 14 feet to 12 feet – a width that was presented and agreed upon during stakeholder meetings and at the public meeting held in February 2018. A 12-foot width is simply not adequate to safely accommodate those crossing by foot, on bike, in a wheelchair, with a stroller or using new micro-mobility options that are growing rapidly.

We are not asking for a luxury item, but rather a standard. Federal AASHTO and Massachusetts state standards for shared-use paths require a minimum 10-foot path with 2-foot side paths for a 14-foot right-of-way. Bridges are wider as there is no shoulder for users to pass or pause to rest and/or view the river. The Northern Strand Commuter Trail, the primary feeder for this bridge, has a 14-foot clear right-of-way to allow for widening of the trail as demand rises. A trail is easy to change; a bridge is not.

Further, federal standards specify that additional width is required if 85% of users are pedestrians. The projected use levels presented by the proponent are estimated to be 2,390 users/weekday, 85% pedestrian. It's important to note that this doesn't take into account the ever-growing presence of electric bikes and scooters. The path will serve as a long-distance biking corridor as well local pedestrian connection to the Orange Line and employment and entertainment centers of Encore Boston Harbor and Assembly Row.

Given these statistics and the fact that this bridge will be the only safe, off-road active transportation connection from North Shore communities to Boston, **it should reflect the design standards for 21st century pedestrian/bicycle infrastructure with a 14-foot width.** The same 14-foot clear standard applies to the Boston Harborwalk, a relevant waterfront precedent. See the below list of pedestrian/bicycle bridges designed/built in the past five years – all of which are a minimum of 14-feet and have shorter spans than the Mystic Crossing bridge, one of the longest in the state at 785 feet.

Precedent Pedestrian/Bicycle Bridges

Complete: Fanny Appleton Bridge [14' width, 607' length]

Complete: Whittier Bridge [15' width, vehicular with shared-use path]

Complete: Cape Cod Rail Trail, Bass River Bridge [14' width]

In-Design: Bruce Freeman Rt. 2 Bridge [14' width, 304' length]

In-Design: Waltham-Wayside Bridge [14' width]

In-Design: Riverside/Charlestown Bridge [16', 150' length]

These standards of safety are not abstract but are necessary as evidenced by the recent collision and resulting fatality on the Minuteman Bikeway caused by passing cyclists. We believe it to be wise to think long-term and invest in minimizing conflict and discomfort of users of all ages, abilities and modes.

Connection to Assembly Row T

We urge the state to invest in the retrofit of the Orange Line's Assembly Row T Station to provide direct access from the bridge landing in Somerville. This reduced travel time — a 1- to 2-minute walk instead of an 8- to 10-minute walk to the existing entry — will have a significant impact on use.

Local Compensatory Mitigation

We respectfully ask that any required mitigation to offset the impacts of this project be directed locally, not into the in-lieu fee program. We are partnering with DCR on a restoration effort at Draw 7 Park, directly adjacent to the bridge. Mitigation funding could advance the living shoreline, currently in the design phase, providing direct environmental benefit to the area affected by the bridge. This will complement the existing living shoreline across the river at Encore Boston Harbor.

Chapter 91 Public Process

We respectfully ask that DEP host a public meeting as part of the Chapter 91 permitting process. We recognize that the bridge is a water-dependent use and therefore a public forum is not required, however the public access component of this project calls for increased transparency and feedback.

Conclusion

Lastly, this bridge has the potential to advance equity goals. Three pedestrian bridges, similar in scale to this one, have been built or are in-progress along the Charles River (North Bank, South Bank, Fanny Appleton/Longfellow) in the past seven years. We ask that the same investments be made in the Mystic River, a region with the highest population densities and environmental justice communities in the state.

In closing, we are supportive of this important transportation improvement project but urge the state to carefully evaluate the bridge design to maximize this expensive infrastructure investment that will last for generations to come. Please notify us of future design and permitting milestones. If you have any questions or require additional information please contact MyRWA at (781) 316-3438 or by emailing patrick@mysticriver.org.



Thank you for your consideration.

A handwritten signature in black ink that reads "Patrick M. Herron". The signature is written in a cursive, flowing style.

Patrick Herron
Executive Director
Mystic River Watershed Association

A handwritten signature in black ink that reads "Amber Christoffersen". The signature is written in a cursive, flowing style.

Amber Christoffersen
Greenway Director
Mystic River Watershed Association

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