



July 29, 2019

Somerville Conservation Commission
Rachel Borgatti, Chair

Dear Ms. Borgatti,

We appreciate 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.

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, increase benefit, and decrease environmental impact;
- (2) **Need for increase in Time of Year restriction for no in-water work**;
- (3) **Need for a more robust stormwater management system**; and
- (4) **Compensatory mitigation should be applied locally**, not into the in-lieu fee program.

Expanded Bridge Width

We have been 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.

Given that the bridge is a significant investment in the community infrastructure and will have significant environment impacts during construction, we feel that an important part of the environmental mitigation is to provide the enhanced benefit of a 14-foot wide bridge. In addition, we feel that the growing demands of nonvehicular modes of transportation will rapidly exceed the limitations of the 12-foot wide span, not to mention the high-value destinations at each end. To avoid the future environmental impact and community disruption of expanding the bridge in the future, the bridge should be constructed at the previously agreed 14-foot width.

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.

Time of year restriction for no in-water work

The NOI states that work within the Fish Run including dredging, disposal of dredged material, or filling will not take place between March 15th and June 15th. We feel that this period of time is too short to protect the important herring run in the Mystic River, the largest in Massachusetts. We respectfully request that the Conservation Commission support the time of year restriction for no in-water work recommended by Division on Marine Fisheries in their comments on the ENF to avoid impacts to diadromous fish and winter flounder, which is from Feb 15th to June 30th.

Stormwater Management

The bridge structure has essentially no management of stormwater. As stated in the NOI, "The Bridge deck spanning the Mystic River is designed to direct stormwater directly to the Mystic River via a grating system." We feel that this lack of stormwater management allows pollutants including, dog waste, oil/grease from bicycles, and chemicals from surface treatment to flow directly into the Mystic River.

We would note that the recently submitted NOI for the South Bank Pedestrian Bridge in Boston is using a stormwater management system to collect, treat, and discharge runoff in accordance with the standards contained in the Massachusetts Stormwater Management Policy. The proposed bridge has a deck pitched to one side to move stormwater off the bridge, where it will be collected at deep sump catchbasins. Therefore, we respectfully request that the Conservation Commission require a more robust stormwater management system to protect the Mystic River from these pollutants.

Construction Management Plan

Regarding the referenced, "Construction Management Plan," MyRWA requests to be include in the review on that plan when it is made available.

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. In addition, as stated above, we feel that an increase in the bridge width from 12 feet to 14 feet should be considered a mitigation for this project.

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 Conservation Commission to carefully evaluate the bridge design and environmental impacts to maximize this expensive infrastructure investment that will last for generations to come. 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, appearing to read "Patrick M. Herron".

Patrick Herron
Executive Director
Mystic River Watershed Association

A handwritten signature in black ink, appearing to read "Amber Christoffersen".

Amber Christoffersen
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