
Appendix E.7
Section 106 Correspondence

Overall Timeline of Section 106 Correspondences for GBR EIS

1. 07/28/2004* SHPO Archaeology Meeting Briefing Package mailed to be NJHPO and NYSOPRHP
2. 08/11/2004* Minutes of Archaeology Coordination Meeting with NYSOPRHP
3. 08/17/2004* Email from Doug Mackey, NYSOPRHP, approving final minutes of the Archaeology Coordination Meeting of August 11, 2004
4. 08/18/2004* Email Mike Gregg, NJHPO endorsing decisions made at the Archaeology Coordination Meeting of August 11, 2004
5. 09/08/2004 - NYCLPC Archaeology/Historic Environmental Review Forms (x2) following review of Draft Public Scoping Document
6. 03/14/2005* NYCLPC Archaeology/Historic Environmental Review Form
7. 03/21/2005* NYCLPC Archaeology/Historic Environmental Review Form
8. 04/14/2005* National Park Service letter regarding National Register of Historic Places
9. 05/05/2005* Minutes of Coordination Meeting with NJHPO for Historical/Architectural Resources
10. 06/17/2005* USCG Project Initiation Letters for Section 106 Consultation with both NJHPO and NYSOPRHP
11. 07/14/2005* NYSOPRHP Response Letter to USCG regarding Initiation of Section 106 Consultation
12. 07/25/2005* USCG Follow-Up Letter to NYSOPRHP letter of July 14, 2005
13. 10/31/2005* USCG Letter to NJHPO regarding proposed APE for Historic Architectural Resources and minutes of the October 17, 2005 field visit with NJHPO.
14. 12/07/2005* NJHPO Email to USCG with NJHPO Expanded APE for Historic Architectural Resources
15. 03/10/2006* USCG Response to NJHPO Email of December 2007 with Revised/Final APE and Technical Memorandum on the Consideration of the APE for Historic Architectural Resource
16. 07/20/2007* NJHPO Concurrence of the Revised/Final APE provided by USCG March 10, 2006
17. 09/28/2007* NJHPO Review Comments regarding August 2007 submission of Archaeological and Historic Architectural Reports
18. 11/16/2007 - NYSOPRHP Review Comments Regarding August 2007 submission of Archaeological and Historic Architectural Reports
19. 11/28/2007 - USCG Response to NYSOPRHP comments of November 16, 2008
20. 12/13/2007 - LBG Letters (x2) re: List of Interested Parties to both NJHPO and NYSOPRHP
21. 12/18/2007 - NYSOPRHP comments to November 16, 2007 letter regarding comments to Archaeological Report
22. 05/07/2008 - USCG Transmittal Letter to NYCLPC of Phase I Archaeological Report (dated August 2007) and Historic Resources Effects Assessment (dated April 2008)
23. 05/13/2008 - NYCLPC Archaeology Environmental Review Form
24. 05/29/2008 - NYCLPC Effect Assessment Environmental Review Form
25. 05/21/2008* NJHPO Review Comments regarding December 2007 submission of the Revised NJ Historic Architecture Report, April 2008 submission of the Historic Resources Effects Assessment, and April 2008 submission of the Historic Bridge Alternatives Analysis
26. 05/21/2008* USCG Letter to NYSOPRHP for submittal of an additional Historic Resource Inventory Form (Blue Form) prepared for the Staten Island Railway Lift Truss Bridge over Arthur Kill (1959 Vertical Lift Bridge)
27. 06/04/2008* NYSOPRHP Concurrence regarding Eligibility of the Staten Island Railway Lift Truss Bridge
28. 07/11/2008* NYSOPRHP Review Comments regarding April 2008 submission of the Effects Assessment for Architectural Properties
29. 08/13/2008 - NYCLPC Historic Resources Assessment Report Environmental Review Form
30. 08/27/2008 - NYCLPC Historic Bridge Alternatives Analysis Environmental Review Form
31. 09/09/2008 - NJHPO Review comments regarding July 2008 submission of the New Jersey Historic Architecture Resource Study, August 2008 submission of the Historic Bridge Alternatives Analysis, and August 2008 submission of the Historic Resources Effects Assessment
32. 11/04/2008 - USCG Response Letter to NJHPO comments of September 9, 2008
33. 12/09/2008 - LBG Additional Follow-up with NYSOPRHP re: the Travis Branch RR Overpass
34. 12/19/2008 - NYSOPRHP Concurrence regarding Non-Eligibility of the Travis Branch RR Overpass
35. 04/20/2009 - Minutes of pre-MOA Meeting with NJHPO and NYSOPRHP.
36. 05/13/2009 - USCG Letter to ACHP advising of Adverse Effect Determination and Invitation to Participate in Section 106 Process.

* Indicates that such correspondence is already provided in one of the individual Section 106 Consultation reports (see Appendices E.1 through E.6). Otherwise, such correspondence is then herein provided in Appendix E.7.

Abbreviations: United States Coast Guard (USCG); State Historic Preservation Officer (SHPO); New Jersey Historic Preservation Office (NJHPO); New York State Office Parks, Recreation, and Historic Preservation (NYSOPRHP); New York City Landmarks Preservation Commission (NYCLPC); National Park Service (NPS); Area of Potential Effect (APE); The Louis Berger Group Inc. (LBG); Memorandum of Agreement (MOA); Advisory Council on Historic Preservation (ACHP).

THE CITY OF NEW YORK LANDMARKS PRESERVATION COMMISSION
1 Centre St., 9N, New York, NY 10007 (212) 669-7700

ENVIRONMENTAL REVIEW

USCG /ER.R

09/02/04

PROJECT NUMBER

DATE RECEIVED

PROJECT

GOETHALS BRDG MODERNIZ'TN:

RECEIVED
SEP 21 2004

- No architectural significance
- No archaeological significance
- Designated New York City Landmark or Within Designated Historic District
- Listed on National Register of Historic Places
- Appears to be eligible for National Register Listing ~~and/or New York City Landmark Designation~~
- May be archaeologically significant; requesting additional materials

COMMENTS

The LPC is in receipt of the scope of work for EIS (SEIS) dated 8/20/04. The text for historic properties appears to be acceptable. The LPC concurs with the SHPO finding regarding the eligibility of the bridge for listing on the State/National Registers. Archaeology comments are under separate cover.

cc: NYS SHPO



 SIGNATURE DATE

THE CITY OF NEW YORK LANDMARKS PRESERVATION COMMISSION
1 Centre St., 9N, New York, NY 10007 (212) 669-7700

ENVIRONMENTAL REVIEW

| | |
|----------------|---------------|
| USCG/ER.R | 09/07/04 |
| PROJECT NUMBER | DATE RECEIVED |

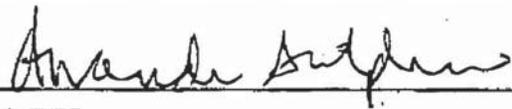
PROJECT

GOETHALS BRDG MODERNIZ'TN:

- No architectural significance
- No archaeological significance
- Designated New York City Landmark or Within Designated Historic District
- Listed on National Register of Historic Places
- Appears to be eligible for National Register Listing and/or New York City Landmark Designation
- May be archaeologically significant; requesting additional materials

COMMENTS

Archeology comments only. The text of the SEIS appears to be adequate.

| | |
|---|----------|
|  | 09/08/04 |
| SIGNATURE | DATE |



New York State Office of Parks, Recreation and Historic Preservation

Historic Preservation Field Services Bureau • Peebles Island, PO Box 189, Waterford, New York 12188-0189

518-237-8643

www.nysparks.com

November 16, 2007

Kristofer M. Beadenkopf, RPA
Archaeologist
Cultural Resource Group
The Louis Berger Group, Inc.
412 Mount Kemble Avenue
Morristown NJ 07960-6654

Eliot Spitzer
Governor

Carol Ash
Commissioner

Re: USCG Goethals Bridge Replacement
Historic Resources Survey Report (8/2007)
Phase I Archaeological Survey Report (8/2007)
NYSHPO# 04PR03162

Dear Mr. Beadenkopf:

As I explained in our telephone conversation of this date, we have received and reviewed the above reports. We have no comments regarding the HRSP beyond concurring with your evaluation that none of the additional properties identified are National Register Eligible.

However, Doug Mackey of our archeology unit did forward comments regarding the archaeological survey to me, which I promptly overlooked. Doug's comments follow with my apology for the delayed response:

The NY SHPO concurs with the results of the archaeological testing that no National Register Eligible sites were identified within the area examined. However, the archeological APE is defined as a corridor 1200 feet wide (500 feet north and 700 feet south of the existing centerline). Despite this, the archaeological testing in most areas was confined to one or two transects leaving much of the APE unexamined. While SHPO is aware that large portions of the APE consist of additional filled marsh, as identified by the areas tested, or previously disturbed and covered soils, we can not concur with the recommendation that "no further archaeological investigations are recommended for the proposed project"(page 85-86).

NY SHPO will need to see more detailed information on the location of proposed ground disturbing activities before being able to make any such broad statements. At this time we would recommend that as the projects impacts are more refined, the data collected by the testing conducted out so far, be utilized to help identify any additional areas that may need to be tested. NY SHPO will be happy to work with you on defining additional areas in need of testing.

Questions regarding these comments should be directed to Doug Mackey at (518) 237-8643, extension :291 or by email at douglas.mackey@oprhp.state.ny.us.

Sincerely,

James Warren
Historic Sites Restoration Coordinator

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
First Coast Guard District

One South Street
Battery Building
New York, NY 10004

Staff Symbol: dpb
Phone: 212 668-7165
Fax: 212 668-7967

November 28, 2007

Ms. Ruth L. Pierpont
Director Field Services Bureau
NY State Office of Parks, Recreation & Historic Preservation
Peebles Island P.O. 189
Waterford, NY 12188-0189

**Re: Goethals Bridge Replacement Environmental Impact Statement (GBR EIS),
Staten Island, Richmond County, NY – NYSHPO #04PR03162**

Dear Ms. Pierpont:

The U.S. Coast Guard (USCG), as federal lead agency for the Goethals Bridge Replacement Environmental Impact Statement (GBR EIS), thanks you and your staff for your letter of November 16, 2007 regarding comments on the *Historic Resources Survey Report* and *Phase I Archaeological Survey Report*, both dated August 2007 submitted for the referenced project. We are forwarding the enclosed materials for your review in response to your request for additional detailed information regarding ground disturbing activities associated with the alternatives for the Goethals Bridge Replacement.

The enclosed graphic representations of the four alignments currently being considered for this project also illustrate the locations of excavated shovel test pits which were reported upon in the *Phase I Archaeological Report* dated August 2007 that was reviewed by Douglas Mackey of your staff. Please note that the four alternatives being considered do not propose construction or ground disturbances east of the existing toll plaza. Also, the shovel test pit transects that were excavated for this project are representative of where the ground disturbances would occur within each of these four alternatives, with the exception of the proposed relocation of Goethals Road North that is associated with both of the Northern Alternatives being considered. It is my understanding that Douglas Mackey advised Kristofer Beadenkopf of our consultant team (Louis Berger/Parsons Brinckerhoff Joint Venture) that your agency may require additional archaeological testing along the route of the proposed relocation of Goethals Road North if one of the Northern Bridge alternatives was to be ultimately selected as the environmentally preferred option. Therefore, such additional testing is not proposed to be performed prior to the circulation of the Draft EIS.

Berger/PB JV is authorized to discuss technical matters, on behalf of the Coast Guard, directly with your agency during this consultation. You should, therefore, feel free to contact Kristofer Beadenkopf at 973-407-1261, or Susan Grzybowski at 973-407-1266 regarding any questions or comments concerning the enclosed materials. I can also be reached at 212-668-7021.

Thank you for your assistance in this undertaking. The Coast Guard looks forward to your continued involvement in the EIS process and associated Section 106 Consultation Process.

Sincerely,



Gary Kassof
Bridge Program Manager
First Coast Guard District
By Direction of the District Commander

Enclosures:

- *Existing Alignment North showing Completed Subsurface Testing*
- *New Alignment North showing Completed Subsurface Testing*
- *Existing Alignment South showing Completed Subsurface Testing*
- *New Alignment South showing Completed Subsurface Testing*

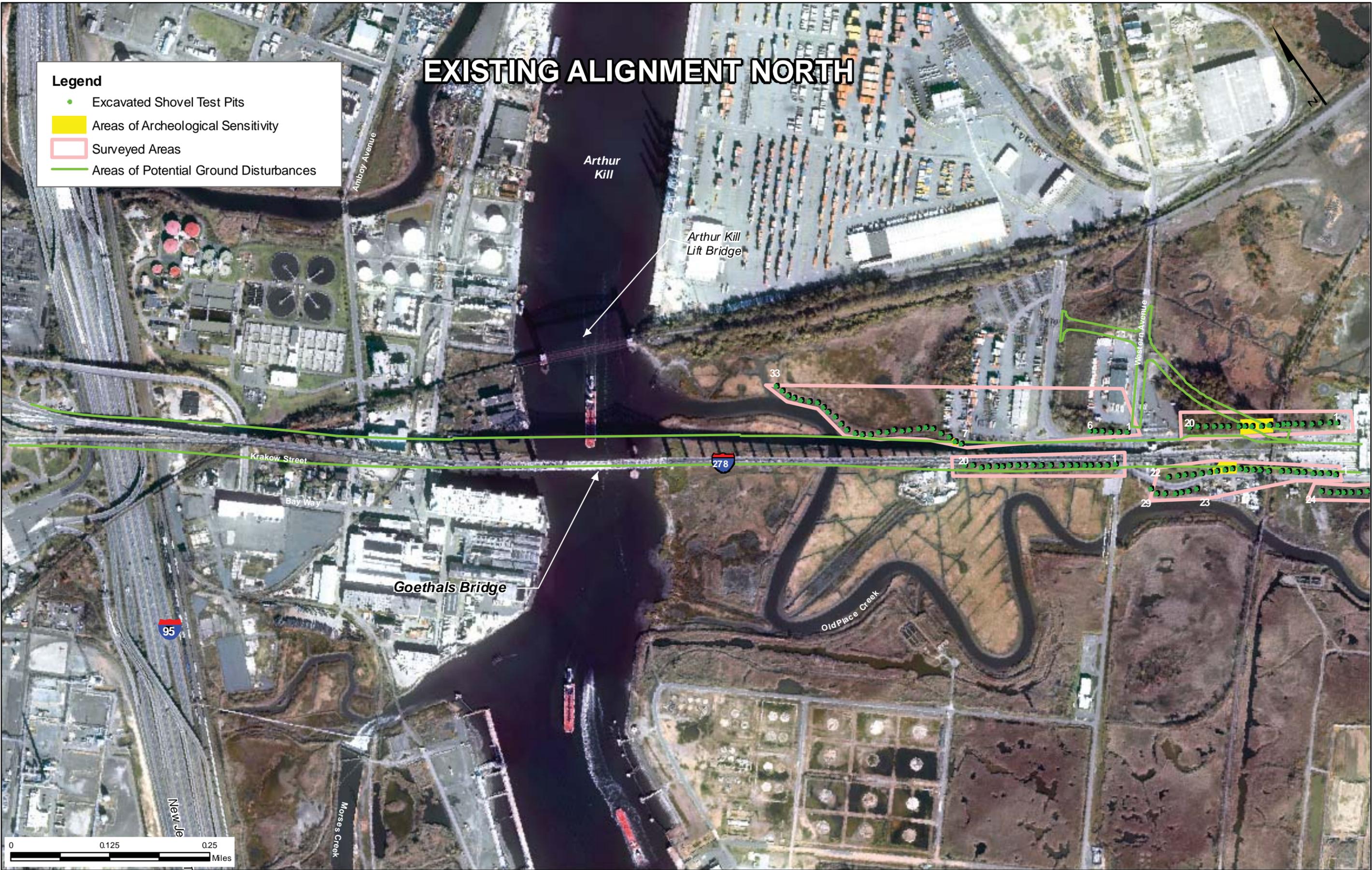
Copy:

James Warren, Douglas Mackey (NYSOPRHP); Ernie Feemster (USCG); J. Blackmore, Coleen Hopson (PANYNJ); Ken Hess, Judith Versenyi, Esther Schwalb, Kristofer Beadenkopf, Deborah Van Steen, Susan Grzybowski (Berger/PB); Sara Moss (BTA)

EXISTING ALIGNMENT NORTH

Legend

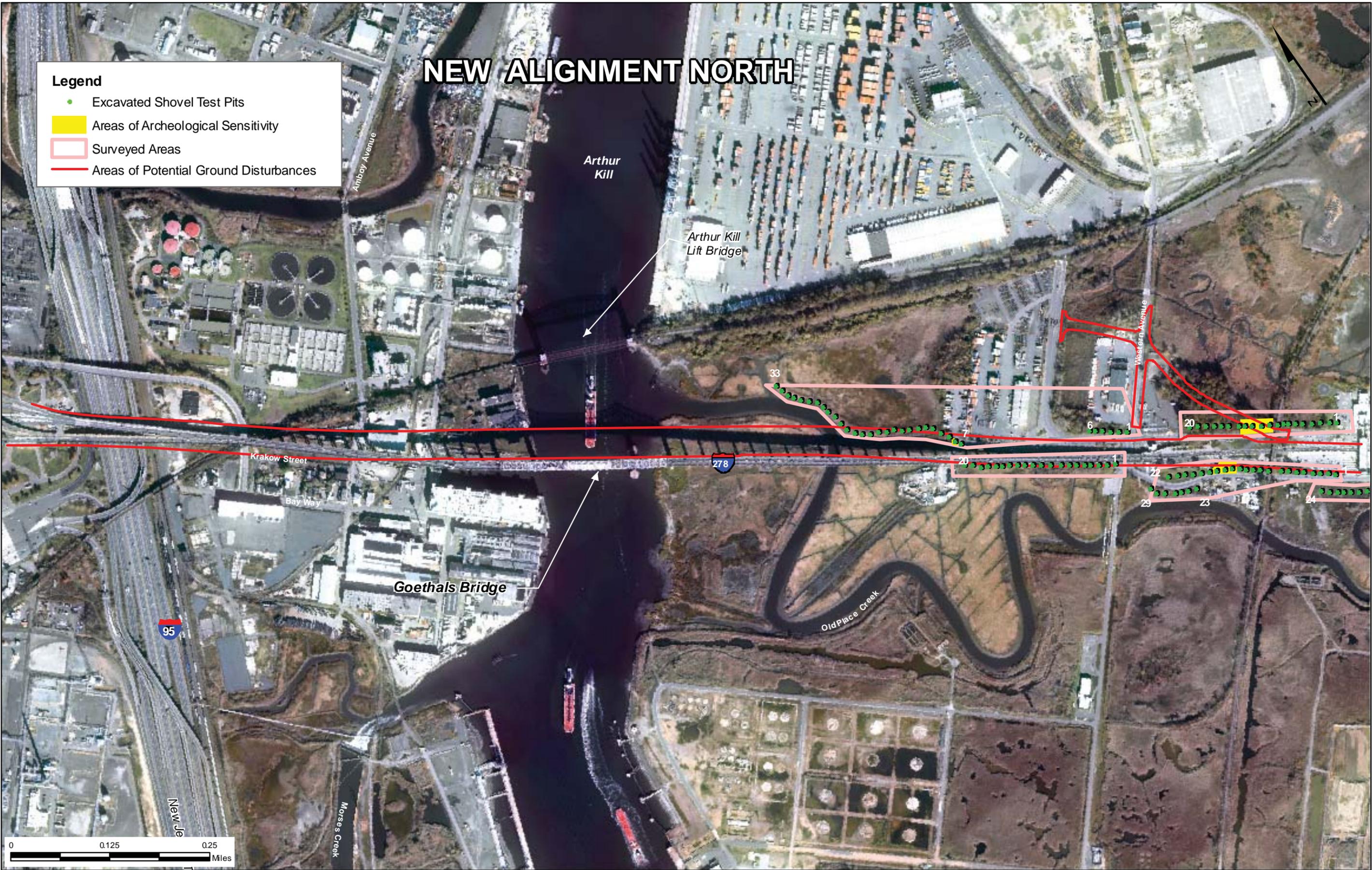
- Excavated Shovel Test Pits
- Areas of Archeological Sensitivity
- Surveyed Areas
- Areas of Potential Ground Disturbances



NEW ALIGNMENT NORTH

Legend

- Excavated Shovel Test Pits
- Areas of Archeological Sensitivity
- Surveyed Areas
- Areas of Potential Ground Disturbances



Arthur Kill

Arthur Kill Lift Bridge

Goethals Bridge

Old Place Creek

Morses Creek

Krakow Street

Bay Way

Amboy Avenue

Westport Avenue

95

278

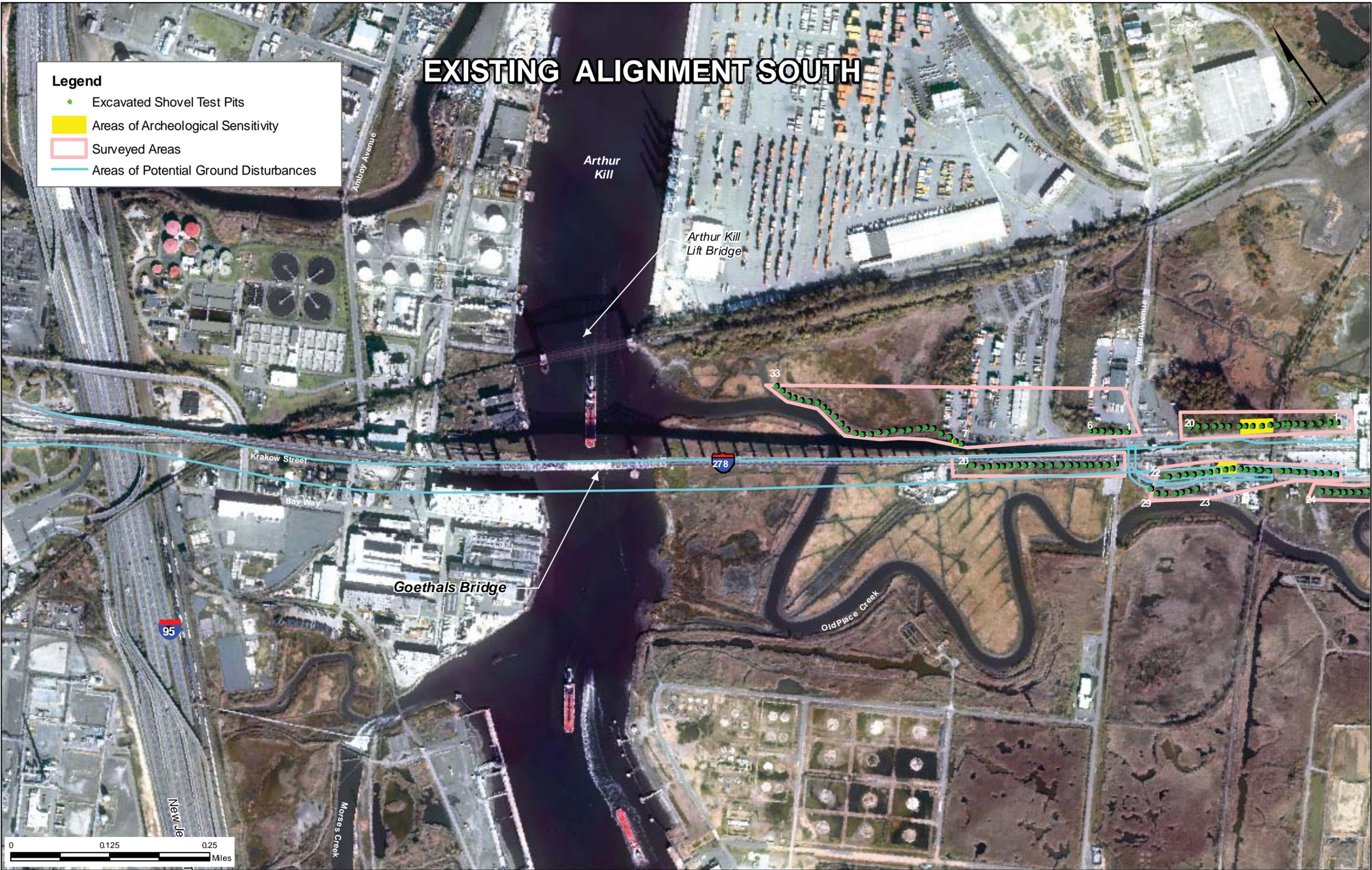
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New Je

EXISTING ALIGNMENT SOUTH

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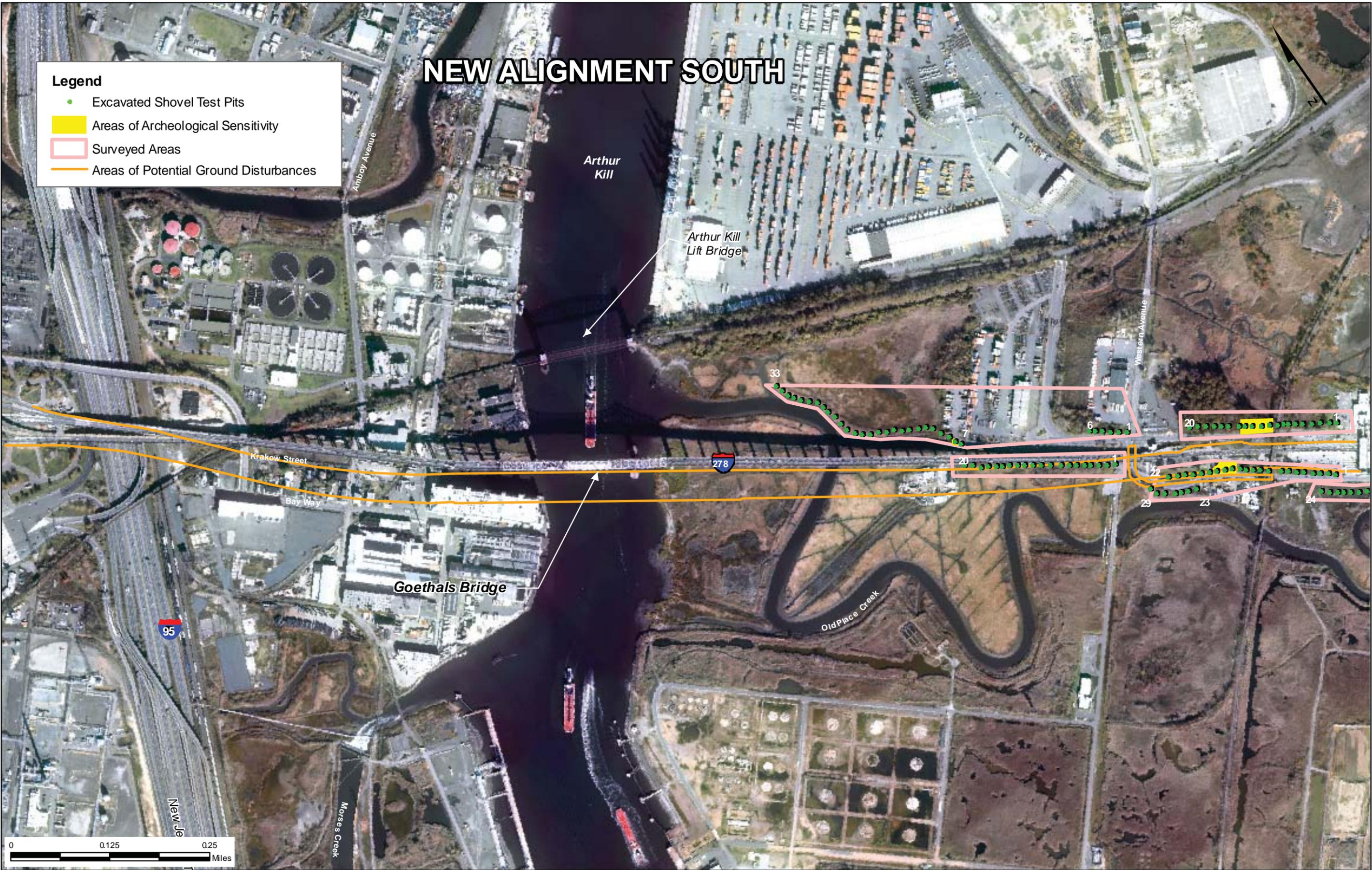
- Excavated Shovel Test Pits
- Areas of Archeological Sensitivity
- Surveyed Areas
- Areas of Potential Ground Disturbances



NEW ALIGNMENT SOUTH

Legend

- Excavated Shovel Test Pits
- Areas of Archeological Sensitivity
- Surveyed Areas
- Areas of Potential Ground Disturbances



Arthur Kill

Arthur Kill Lift Bridge

Goethals Bridge

Amboy Avenue

Krakow Street

Bay Way

Western Avenue

Old Place Creek

Morses Creek

95

278

0 0.125 0.25 Miles

New Je



THE Louis Berger Group, INC.

412 Mount Kemble Avenue, Morristown, New Jersey 07960 USA
Tel 973 407 1000 Fax 973 267 6468 www.louisberger.com

December 13, 2007

Ms. Dorothy P. Guzzo
Deputy Historic Preservation Officer
State Historic Preservation Office
Department of Environmental Protection
501 East State Street, 4th Floor
PO Box 404
Trenton, New Jersey 08625

Re: USCG Goethals Bridge Replacement (NJHPO # I2007-225; NYSHPO # 04PR03162)

Dear Ms. Guzzo:

The United States Coast Guard (USCG) has previously initiated consultation with the New Jersey Historic Preservation Office (NJHPO) and the New York State Office of Parks, Recreation and Historic Preservation (NYSOPRHP) regarding cultural resources studies and consulting/interested parties for the proposed Goethals Bridge Replacement in Elizabeth, Union County, New Jersey and Staten Island, Richmond County, New York, which are being conducted in accordance with Section 106 of the National Historic Preservation Act.

Under the revised 36 CFR Part 800, Protection of Historic Properties, the Advisory Council on Historic Preservation has established an enhanced role for the public and organization to participate in the Section 106 Consultation process. On behalf of the United States Coast Guard and the Port Authority of New York and New Jersey (Project Applicant), The Louis Berger Group, Inc. (Berger) is pleased to provide for your review and approval, this expanded list of the following organizations and/or individuals that will be contacted as part of consultation in accordance with 36 CFR 800.3 and 800.4.

Sincerely yours,
THE LOUIS BERGER GROUP, INC.

Kristofer M. Beadenkopf, RPA
Archaeologist- Cultural Resources



THE Louis Berger Group, INC.

412 Mount Kemble Avenue, Morristown, New Jersey 07960 USA
Tel 973 407 1000 Fax 973 267 6468 www.louisberger.com

INTERESTED PARTIES CONSULTATION

Pursuant to Section 106 regulations, the Advisory Council on Historic Preservation has established an enhanced role for the public and organization to participate in the Section 106 Consultation process. As a result, a letter will be sent to the following organizations/individuals requesting information regarding cultural resources and to solicit input on possible project impacts to cultural resources within or in the vicinity of the areas of potential effects (APE) for the proposed Goethals Bridge Replacement project.

New Jersey

The New Jersey Historical Society
52 Park Place
Newark, New Jersey 07102

Union County Division of Cultural & Heritage Affairs
Ms. Susan P. Coen, Director
633 Pearl Street
Elizabeth, New Jersey 07202

Union County Historical Society
Mr. William Frolich, President/Treasurer
116 E. 4th Avenue
Roselle, New Jersey 07203

Elizabeth Historical Society
Michelle Doran-McBean
1139 E. Jersey St. Suite 201
Elizabeth, New Jersey 07201

Elizabethtown Historical Foundation
PO Box 1
Elizabeth, New Jersey 07207

Central RR of NJ Historical Society, Inc.
PO Box 4226
Dunellen, NJ 08812

New York

The New-York Historical Society
170 Central Park West
New York, NY 10024

Staten Island Historical Society
John W. Guild, Executive Director
441 Clarke Avenue
Staten Island, NY 10306

New York Railroad Enthusiasts
PO Box 040320
Staten Island, NY 10304

Delaware Tribe of Indians
Mr. Jerry Douglas, Chief
220 Northwest Virginia Avenue
Bartlesville, Oklahoma 74003



THE Louis Berger Group, INC.

412 Mount Kemble Avenue, Morristown, New Jersey 07960 USA
Tel 973 407 1000 Fax 973 267 6468 www.louisberger.com

December 13, 2007

Ms. Ruth L. Pierpont
Director Field Services Bureau
NY State Office of Parks, Recreation & Historic Preservation
Peebles Island P.O. 189
Waterford, NY 12188-0189

Re: USCG Goethals Bridge Replacement (NYSHPO # 04PR03162; NJHPO # I2007-225)

Dear Ms. Pierpont:

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Sincerely yours,
THE LOUIS BERGER GROUP, INC.

Kristofer M. Beadenkopf, RPA
Archaeologist- Cultural Resources



THE Louis Berger Group, INC.

412 Mount Kemble Avenue, Morristown, New Jersey 07960 USA
Tel 973 407 1000 Fax 973 267 6468 www.louisberger.com

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The New Jersey Historical Society
52 Park Place
Newark, New Jersey 07102

Union County Division of Cultural & Heritage Affairs
Ms. Susan P. Coen, Director
633 Pearl Street
Elizabeth, New Jersey 07202

Union County Historical Society
Mr. William Frolich, President/Treasurer
116 E. 4th Avenue
Roselle, New Jersey 07203

Elizabeth Historical Society
Michelle Doran-McBean
1139 E. Jersey St. Suite 201
Elizabeth, New Jersey 07201

Elizabethtown Historical Foundation
PO Box 1
Elizabeth, New Jersey 07207

Central RR of NJ Historical Society, Inc.
PO Box 4226
Dunellen, NJ 08812

New York

The New-York Historical Society
170 Central Park West
New York, NY 10024

Staten Island Historical Society
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441 Clarke Avenue
Staten Island, NY 10306

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Mr. Jerry Douglas, Chief
220 Northwest Virginia Avenue
Bartlesville, Oklahoma 74003



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518-237-8643

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Eliot Spitzer
Governor

Carol Ash
Commissioner

December 18, 2007

Garry Kassof
Bridge Program Manager
First Coast Guard District
One South Street
Battery Building
New York, NY 10004

Dear Mr. Kassof,

Re: USCG
Goethal's Bridge Replacement
Staten Island, Richmond County, NY
04PR03162

Thank you for requesting the comments of the New York State Historic Preservation Office (SHPO) with regard to the potential for this project to affect significant historical/cultural resources. SHPO has reviewed your submission of November 28, 2007 in which four specific alignments are presented with respect to the completed archaeological investigations. Based on this review SHPO concurs that the archaeological testing completed for the two Southern alignments has been sufficient to identify possible deposits, and that no further testing is needed if either of those alignments are chosen. We also concur that for the two Northern alignments, the testing along the main corridors has been sufficient, however, both of these alignments call the relocation of Goethal's Road North into areas that have not been previously tested, and additional testing will be necessary if either of those alignments are chosen. We will be happy to consult further on the specifics of appropriate testing methods for this area if necessary.

Please contact me at extension 3291, or by e-mail at douglas.mackey@oprhp.state.ny.us, if you have any questions regarding these comments.

Sincerely

Douglas P. Mackey
Historic Preservation Program Analyst
Archaeology

✓ Cc: Kristofer Beadenkopf, Berger

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
First Coast Guard District

One South Street
Battery Building
New York, NY 10004

Staff Symbol: dpb
Phone: 212 668-7165
Fax: 212 668-7967

May 7, 2008

Ms. Amanda Sutphin, RPA
Director of Archaeology
New York City Landmarks Preservation Commission
Municipal Building
1 Centre Street, 9th Floor
New York, NY 10007

Re: Goethals Bridge Replacement Project
Staten Island, Richmond County, NY

Dear Ms. Sutphin:

As requested by the New York City Landmarks Preservation Commission at the meeting of April 24, 2008 with the Mayor's Office of Environmental Coordination (OEC), the U.S. Coast Guard (USCG) is transmitting the enclosed *Phase I Archaeological Report (dated August 2007)* for your review and information as part of the City Environmental Quality Review (CEQR) process. Under the proposed Goethals Bridge Replacement Project, the Port Authority of New York and New Jersey (PANYNJ) is the Project sponsor while the U.S. Coast Guard is the federal lead agency for the preparation of the environmental impact statement (EIS) in accordance with the National Environmental Policy Act (NEPA) of 1969.

The *Phase I Archaeological Report (dated August 2007)*, which includes information regarding the archaeological surveys that were completed in New York (New Jersey included as well in order to streamline the review process), was originally submitted to the New York State Office of Parks Recreation and Historic Preservation (NYSOPRHP) and the New Jersey Historic Preservation Office (NJHPO) in August 2007 in accordance with Section 106 of the National Historic Preservation Act.

This report has been reviewed by both the NYSOPRHP and the NJHPO. The NJHPO, in its September 28, 2007 letter, indicated that the "effort to identify archaeological sites and report the survey results meets [NJ]HPO guidelines. No further archaeological work is recommended".

In a series of letters (enclosed) the NYSOPRHP:

- a. concurred that the archaeological survey did not identify any archaeological resources that are eligible for inclusion in the National Register of Historic Places (NRHP). (Nov. 16, 2007)
- b. requested further information regarding the relationship of proposed ground disturbance and the archaeologically surveyed areas in order to assess the need for further archaeological investigations. Material provided. (Nov. 16, 2007)
- c. concurred that the shovel test pit transects were representative of where the ground disturbances would occur within the main corridors of each of the four alternatives. (Dec. 18, 2007)

- d. indicated that the archaeological survey completed for the two Southern Alternatives and the main corridors of potential disturbance within the two Northern Alternatives was sufficient to identify possible archaeological deposits. (Dec. 18, 2007)
- e. indicated that additional archaeological testing along the route of the proposed relocation of Goethals Road North will be necessary if one of the two Northern Alternatives were to be ultimately selected as the environmentally preferred option. (Dec. 18, 2007)

Such additional testing recommended in e. above is not proposed to be performed prior to the circulation of the Draft EIS and selection of the preferred alternative.

Also enclosed for your review and information is a copy of the *Goethals Bridge Replacement: Staten Island, Richmond County, New York and the City of Elizabeth, Union County, New Jersey Historic Resources Effects Assessment* that was submitted to the NYSOPRHP and NJHPO in April 2008. This report also includes information regarding the archaeological and historic architectural surveys that were conducted in New York as well as New Jersey.

For your convenience and information, the following NYSOPRHP and NJHPO staffs have been involved with the investigation of archaeological resources associated with the Goethals Bridge Replacement Project since the beginning of our on-going consultation effort:

NYSOPRHP

- Douglass Mackey
- Beth Cumming

NJHPO

- Michael L. Gregg
- Katherine Marcopul

Also, please note that materials related to the historic architectural survey(s) that was completed for the Goethals Bridge Replacement Project as well as a copy of the Effects Assessment is being provided under separate cover to Gina Santucci, Environmental Review Coordinator, New York City Landmarks Preservation Commission.

The U.S. Coast Guard authorizes the Louis Berger Group, Inc./Parsons Brinckerhoff, Inc. Joint Venture, the environmental consultant team assisting the USCG with preparation of the GBR EIS, to discuss technical matters associated with archaeological resources directly with your agency during this consultation. To that effect, please feel free to contact directly Kristofer Beadenkopf at 973-407-1261 or Susan Grzybowski at 973-407-1266 for any questions or comments concerning the enclosed report. Otherwise, please call me at 212-668-7021.

Thank you for your assistance in this undertaking and the U.S. Coast Guard looks forward to your continued involvement in the EIS process and associated Section 106 Consultation and CEQR Processes.

Sincerely,



Gary Kassof
 Bridge Program Manager
 First Coast Guard District
 By Direction of the District Commander

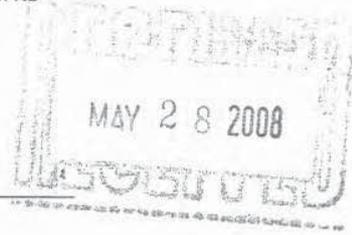
Enclosures:

- Phase I Archaeological Report (dated August 2007)
- NYSOPRHP Correspondence Packet-Archaeological Resources
- *Goethals Bridge Replacement: Historic resources Effects Assessment* (dated April 2008)

Copy:

- Robert Kulikowski (OEC); Jim Blackmore, Coleen Hopson, Ed Lopez (PANYNJ); Ken Hess, Judy Versenyi, JP Magron (Berger/PB)

ENVIRONMENTAL REVIEW



UNITED STATES COAST GUARD/ER.R

5/8/2008

Project number

Date received

Project: Goethals Bridge Replacement

Comments: The LPC is in receipt of the, "Phase 1 Archaeological Report for Goethals Bridge Replacement, Richmond County, New York and the City of Elizabeth, New Jersey," prepared by Louis Berger, Inc and dated August 2007 as well as graphic representations of the alignments of the four proposed corridors dated November 28, 2007.

We concur with the New York State Office of Parks, Recreation, and Historic Preservation in their comments dated December 18, 2007 that the two southern alignments are unlikely to impact potentially significant archaeological resources and the main corridors of the two northern alignments are also unlikely to contain significant archaeological resources, but that the relocation of the Goethal's Road North (which is part of the two northern alignments) should be tested before any conclusions about the archaeological sensitivity of this area can be determined.

cc: NY SHPO

5/13/2008

SIGNATURE

DATE

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THE CITY OF NEW YORK LANDMARKS PRESERVATION COMMISSION
1 Centre Street, 9N, New York, NY 10007 (212) 669-7700 www.nyc.gov/landmarks

ENVIRONMENTAL REVIEW

UNITED STATES COAST GUARD/ER.R

5/16/2008

Project number

Date received

Project: GOETHALS BRIDGE REPLACEMENT

Comments: The LPC is in receipt of the Historic Resources Effects Assessment dated 4/08. The LPC concurs with the findings regarding architectural identification for the NY APE. The Goethals Bridge does not appear eligible for LPC designation.

5/29/2008

SIGNATURE

DATE



5734_FSO_GS_05292008.doc

ENVIRONMENTAL REVIEW

UNITED STATES COAST GUARD/ER.R

8/4/2008

Project number

Date received

Project: GOETHALS BRIDGE REPLACEMENT

Comments: The LPC is in receipt of the, "Goethals Bridge Replacement Statement Island, Richmond County, New York and the City of Elizabeth, Union County, New Jersey Historic Resources Assessment Report," prepared by Louis Berger and dated July 2008. The LPC concurs with the text pertaining to archaeology.

The Goethals Bridge does not appear eligible for LPC designation. There are no further concerns for architectural resources.

cc: NYS SHPO

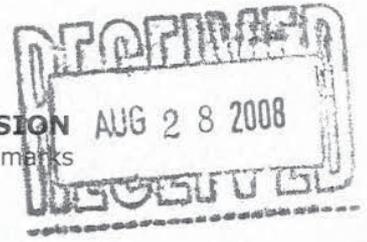
8/13/2008

SIGNATURE

DATE



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ENVIRONMENTAL REVIEW

UNITED STATES COAST GUARD/ER.R

8/20/2008

Project number

Date received

Project: GOETHALS BRIDGE REPLACEMENT

Comments: The LPC is in receipt of the, "Historic Bridge Alternatives Analysis for Goethals Bridge Replacement Connecting Interstates 278 and 95 over the Arthur Kill," prepared by Louis Berger and dated August 2008. The LPC concurs with the text pertaining to architecture and archaeology.

cc: NY SHPO

8/27/2008

SIGNATURE

DATE

Gina Santucci

5734_FSO_GS_08272008.doc

Please include an email
contact on all future
submissions. *thx*

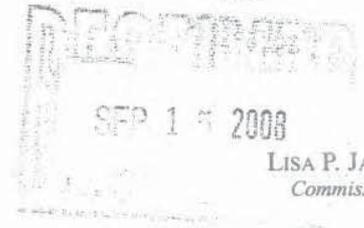
[Signature]



HPO-I2008-79
05-0030-8, 11, 12
Prod

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Natural and Historic Resources, Historic Preservation Office
PO Box 404, Trenton, NJ 08625
TEL: (609) 292-2023 FAX: (609) 984-0578
www.state.nj.us/dep/hpo

JON S. CORZINE
Governor



LISA P. JACKSON
Commissioner

September 9, 2008

Gary Kassoff, Bridge Program Manager
First Coast Guard District
One South Street
Battery Building
New York, NY 10004

Dear Mr. Kassoff:

As Deputy State Historic Preservation Officer for New Jersey, in accordance with 36 CFR Part 800: Protection of Historic Properties, as published with amendments in the Federal Register on 6 July 2004 (69 FR 40553-40555), I am providing Additional Consultation Comments for the following proposed undertaking:

**Union County, Elizabeth City
Interstate 278 over the Arthur Kill
Goethals Bridge Replacement**

These comments were prepared in response to your request for Historic Preservation Office review and comment on the following reports:

“Goethals Bridge Replacement, Richmond County New York and The City of Elizabeth, Union County, New Jersey, Historic Architectural Resource Study New Jersey Revised Report” by The Louis Berger Group, Inc./Parsons Brinckerhoff JV. (July 2008)

“Historic Bridge Alternatives Analysis for Goethals Bridge Replacement, Connecting Interstates 278 and 95 over the Arthur Kill” by the Louis BergerGroup/PB Joint Venture (August 2008).

“Goethals Bridge Replacement, Richmond County New York and The City of Elizabeth, Union County, New Jersey, Historic Resources Effects Assessment” by The Louis Berger Group, Inc./Parsons Brinckerhoff JV. (July 2008)

SUMMARY: This project will have an adverse effect on identified historic properties. An addendum to the Alternatives Analysis report, to ensure that there has been adequate planning has occurred to explore all means to avoid or reduce harm to identified historic properties, is requested.

800.4 Identifying Historic Properties

There are 10 architectural resources within the Area of Potential Effects (APE) that have been previously identified as eligible for listing in the New Jersey and National Registers of Historic Places. They are:

1. The Goethals Bridge (SHPO Opinion 2/14/1995);
2. The Staten Island Railroad Historic District (SHPO Opinions 6/11/1991 & 2/27/1995);
3. Staten Island Railway Lift Truss Bridge over the Arthur Kill (SHPO Opinion 6/11/1991);
4. Perth Amboy and Elizabethport Branch of the Central Railroad of New Jersey (SHPO Opinion 8/30/2000);
5. Central Railroad of New Jersey Bridge over the Elizabeth River (SHPO Opinion 4/9/1990);
6. South First Street Bridge over the Elizabeth River (SHPO Opinion 3/23/1998);
7. Mattano Park (SHPO Opinion 5/21/2008);
8. Mravlag Manor Housing (SHPO Opinion 5/21/2008);
9. Sound Shore Railroad Historic District (SHPO Opinion 5/21/2008); and
10. South Front Street Bridge over the Elizabeth River Bridge (SI&A # 2004001)(SHPO Opinion 5/21/2008).

No further work to identify historic properties is required, unless there is a change in the proposed scope of work that would alter the Area of Potential Effects for the project.

800.5 Assessing Effects

The project as proposed – demolition of the Goethals Bridge and replacement with a new structure will have an adverse effect on historic properties. Effects on identified properties are listed individually below:

1. The Goethals Bridge – The project as proposed will have an adverse effect on the individually eligible Goethals Bridge because it involves the demolition of this historic resource.
2. The Staten Island Railroad Historic District – I concur with your consultant’s opinion that the project will have an adverse effect on this resource due to visual impacts.
3. Staten Island Railway Lift Truss Bridge over the Arthur Kill – I concur with your consultant’s opinion that the project will have an adverse effect on this resource due to visual impacts.
4. Perth Amboy and Elizabethport Branch of the Central Railroad of New Jersey – I concur with your consultant’s opinion that the project will have no adverse effect on this resource.

5. Central Railroad of New Jersey Bridge over the Elizabeth River – I concur with your consultant’s opinion that the project will have no adverse effect on this resource.
6. South First Street Bridge over the Elizabeth River – I concur with your consultant’s opinion that the project will have no adverse effect on this resource.
7. Mattano Park – I concur with your consultant’s opinion that the project will have no adverse effect on this resource.
8. Mravlag Manor Housing – I concur with your consultant’s opinion that the project will have no adverse effect on this resource.
9. Sound Shore Railroad Historic District – I concur with your consultant’s opinion that the project will have no adverse effect on this resource.
10. South Front Street Bridge over the Elizabeth River Bridge – I concur with your consultant’s opinion that the project will have no adverse effect on this resource.

As discussed in a 8/28/2008 meeting between your consultant (Deborah Van Steen and Kenneth Hess, both of The Louis Berger Group Inc.) and my staff (Andrea Tingey), the alternatives analysis report requires some clarifications and/or amplifications. Please see specific report review comments below.

Alternatives Analysis Report Review Comments

An addendum to the alternatives analysis report addressing the comments listed below is requested to ensure adequate documentation of the efforts to develop and evaluate alternatives or modifications to the project that could avoid, minimize, or mitigate adverse effects on historic properties in accordance with 36 CFR Part 800.6.

1. I am concerned by the continued collective inability to find a suitable use and/or re-use for the Goethals Bridge. This bridge has recently undergone significant rehabilitation and maintenance (according to reviewed report almost \$121 million was spent between 1987 and 2005). On a 10/17/2005 field visit, HPO staff witnessed conditions far better than those commonly encountered on iron and steel bridges that are subsequently rehabilitated for continued vehicular and/or pedestrian use. Consequently, use of the bridge for bicycle and pedestrian circulation should be explored. Similarly, mothballing the Goethals for potential mass transit use should be considered. It should be noted that when these concepts were brought up by HPO staff in the 8/28/2008 meeting, the response received was that the United States Coast Guard (USCG) would under no circumstances permit the existing bridge to remain in situ because it demonstrates a navigational hazard. If this is indeed the USCG’s official position, that should be clearly reflected in the administrative record, and a level of supporting documentation akin to that required to demonstrate roadway geometric deficiencies (such as accident data and reports) should be appended.

2. The proposed new bridge is substantially wider than the existing bridge. The approximate out-to-out widths of 210 feet for proposed (interestingly, this would make the new crossing wider than the Leonard Zakim Bridge in Boston, reputedly the world's widest cable stayed bridge at a width of 183 feet {source: http://en.wikipedia.org/wiki/Zakim_Bunker_Hill_Bridge}). Whereas the approximate out-to-out width of the existing is 62 feet. The magnitude of the identified adverse effect on the Staten Island Historic District and the Staten Island Railway Lift Bridge is commensurate with the overall mass of the proposed bridge. Therefore, any opportunities to narrow the proposed bridge should be explored. Another potential advantage to narrowing the proposed bridge would be the possible reuse of the existing bridge to fulfill uses no longer accommodated by the proposed bridge. In examining the cross section of the proposed bridge as shown in Figure 6 of the reviewed alternative analysis report, several clarifications need to be made.
 - Please explain the purpose and/or use of the approximately 5 foot space between the bicycle and pedestrian area and the adjacent westbound travel lanes.
 - Please specify the width of the area designated for 'potential future mass transit corridor'.
 - Please clarify whether there are any other proposed uses within the area designated for 'potential future mass transit corridor'.
 - Please specify the width and purpose and/or use of the approximately 5 foot space between the bicycle and pedestrian area and the eastbound travel lanes.
3. Please submit copies of all comments received in response to the press release of August 2008.
4. Please clarify Table 3 Project Goals Screening Matrix. It seems unusual that point scores were restricted to: 1=does not meet goal, 3=uncertain, and 5=satisfies goal. It would seem reasonable to assume that some alternatives would partially meet project goals with a degree of certainty. Not allowing partial credit would seem to skew the numerical scoring of the alternatives.
5. Please clarify what types of activities might be pursued as transportation mitigation measures.

Additional Comments

I am concerned that issues raised by Elizabeth Mayor J. Christian Bollwage regarding the impacts of additional traffic from the proposed new bridge on the local roadway network have not been adequately addressed.

If you have any questions regarding this letter, please contact Andrea Tingey regarding architecture at (609-984-0539) or Katherine Marcopul regarding archaeology at (609-984-5816). Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Saunders". The signature is fluid and cursive, with a large initial "D" and a long, sweeping tail.

Daniel D. Saunders
Deputy State Historic
Preservation Officer

cc Ruth Pierpont, NYSHPO
Honorable Christian Bollwage, Mayor of Elizabeth
Gina Santucci, New York City Landmarks Preservation Commission
Coleen Hopson, The Port Authority of New York and New Jersey

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
First Coast Guard District

One South Street
Battery Building
New York, NY 10004

Staff Symbol: dpb
Phone: 212 668-7165
Fax: 212 668-7967

Goethals Bridge
November 4, 2008

Mr. Daniel D. Saunders
Deputy State Historic Preservation Officer
New Jersey Department of Environmental Protection
Historic Preservation Office
501 East State Street, 4th Floor
P.O. Box 404
Trenton, NJ 08625-0404

**Re: Goethals Bridge Replacement Environmental Impact Statement (GBR EIS),
Section 106 Consultation:**

- (1) **Historic Architectural Resources Study, New Jersey Revised Report – July 2008**
- (2) **Historic Bridge Alternatives Analysis for Goethals Bridge Replacement – August 2008**
- (3) **Historic Resources Effects Assessment – July 2008**

Dear Mr. Saunders:

The U.S. Coast Guard (USCG) has received your comments dated September 9, 2008, on the several Goethals Bridge Replacement (GBR) reports referenced above and offers the following responses to your comments.

800.4 Identifying Historic Properties – The USCG notes and concurs with NJHPO findings.

800.5 Assessing Effects – The USCG notes and concurs with NJHPO findings.

Alternatives Analysis Report Review Comments

1. The Coast Guard is charged with the responsibility to maintain and monitor marine safety on navigable waters of the United States. In its federal bridge permit approval role, the Coast Guard ensures that adequate navigational clearances are provided through bridge structures. Due to a federal mandate pursuant to the Oil Protection Act of 1990 related to protection against oil and hazard material spills, commercial vessels are being built with double hulls, thereby increasing their width and depth below the waterline. Establishing a two-bridge system that limits the navigational opening to the existing bridge's more restrictive horizontal clearance, creates a potential marine safety issue. The protective cells that are in place adjacent to the existing Staten Island bridge main piers were constructed to deflect wayward vessels from striking the piers due to their proximity to

Subj: GOETHALS BRIDGE

the edge of the navigable channels. These cells have been struck over the years and would likely continue to be struck due, in part, to the increased vessel size. Therefore, from a marine safety perspective, the Coast Guard considers retention of the existing bridge an unacceptable project alternative.

2. Since receipt of your letter, the USCG has requested further clarification from the Port Authority of New York & New Jersey, the project sponsor, regarding the proposed 210' width of the replacement bridge. A detailed and recently updated conceptual cross-section of the proposed GBR provided by the Port Authority is attached for your information. As indicated in that cross-section, the individual components of the replacement bridge, regardless of which alignment alternative is selected, include the following:

- Two roadways, each consisting of three 12'-wide lanes, a 12'-wide right shoulder, a 5'-wide left shoulder, and a 1'-6"-wide safety barrier on each side (i.e., a 56' width for each roadway, or a total width of 112' for both roadways);
- Two 19'-wide areas between and adjacent to the two roadways to accommodate the pylon structures of the two bridge towers and the inner support cables connecting the roadway decks to the towers via cable-stays (i.e., a total width of 38' for both areas);
- A 27'-wide area in the center of the bridge that is reserved for a potential two-directional transit system (bus rapid transit or light rail) at some point in the future, if and when implementation of such a system is determined to be warranted);
- A 10'-wide bicycle/pedestrian facility on the north side of the bridge; and
- Two 11'-6"-wide areas at both extremities of the bridge (i.e., a total width of 23' for both areas) to accommodate the outer support cables to ensure adequate vertical clearance of the cable-stays so as not to interfere with truck and bus movements on the travel lanes and shoulders. Note that the necessary 16'-6" vertical clearance envelopes above each deck are depicted by a dashed box on the attached conceptual cross-section.

Upon review of this cross-section, the USCG is satisfied that the Port Authority has developed a design width that appears to be appropriate for the type and intent of the proposed replacement bridge. We also note that both the potential transit corridor and the bicycle/pedestrian facility proposed as components of the bridge have been included as part of this project in response to stakeholder and public interest for such facilities on the bridge.

The overall 210' width reflects a worst-case scenario to be used for impact assessment in the Draft EIS; the actual width could potentially be somewhat reduced during the final design process following the Port Authority's selection of a preferred alignment alternative. The USCG is satisfied that the 210' width adequately addresses the intent of

Subj: GOETHALS BRIDGE

the National Environmental Policy Act (NEPA) to ensure that the worst-case impacts are identified and assessed.

3. In response to your request for copies of all comments received in response to the Port Authority's GBR project press release of August 2008, please note that Deborah Van Steen of The Louis Berger Group, Inc. provided hyperlinks to all comments via an email to Andrea Tingey dated September 24, 2008. A copy of that email is also attached to this letter.
4. Regarding Table 3 in the *Historic Bridge Alternatives Analysis for Goethals Bridge Replacement* (July 2008), this tabular representation of project alternatives' relative ability to satisfy project goals was developed during the GBR EIS's initial alternatives screening analysis. It was included in the *Historic Bridge Alternatives Analysis* report submitted to NJHPO, which documents the evaluation that was conducted during the screening process to identify which potential project alternatives would best satisfy the goals defined for the proposed project, and which was reviewed through the EIS scoping process. The rating system applied is not unusual for purposes of transportation alternatives screening analyses, and was defined in this manner specifically to be as objective as possible, and limit the degree of subjective judgment involved. To NJHPO's point, the rating of "uncertain," which provided more points for an alternative than were applied for "does not meet goal" but less than "meets goal" allowed for the possibility that an alternative may achieve the goal, whether partially or fully; this rating was applied to an alternative only for conditions that remained uncertain at the conclusion of the screening process. Finally, were the "3" ratings increased to "4," per NJHPO's suggestion to give partial credit, it would not have altered the screening process' conclusions and recommendations regarding which alternatives warranted further, detailed evaluation in the GBR EIS. The four bridge-replacement alternatives would still have garnered the highest total scores.
5. The traffic mitigation plan proposed for the GBR project comprises a Managed Use Lane (MUL) on the proposed GBR and Transportation System Management (TSM) measures at various locations in the Goethals Bridge corridor that would be significantly impacted by the proposed project. The purpose of the traffic mitigation plan is to reduce project-related traffic impacts and thereby return future traffic conditions at significantly impacted locations to traffic conditions that are forecast for those same locations with the future No-Build alternative, i.e., traffic conditions that are forecast to occur without the proposed GBR. The proposed MUL on the GBR would be one lane in each direction for buses and high-occupancy vehicles (HOVs) during peak commuting hours, leaving two general use lanes in each direction during the AM and PM peak commuting hours. The MUL on the GBR, in conjunction with the New York State Department of Transportation's MUL on the Staten Island Expressway (SIE), extending from the Verrazano-Narrows Bridge westward to Richmond Avenue, would effectively mitigate the majority of project-related traffic impacts on the SIE.

Subj: GOETHALS BRIDGE

TSM measures proposed to mitigate project-related traffic impacts on service and local roads in the vicinities of the Verrazano-Narrows Bridge and the Howland Hook Marine Terminal in New York, and in the Bayway Circle/Avenue corridor in New Jersey include signal timing changes, signalization of intersections, re-striping of roadways, and removal of on-street parking, specific to each impacted location. Mitigation analyses conducted for the GBR EIS forecast that the identified TSM measures would effectively mitigate most locations back to No-Build conditions. In some cases, the combined effects of the MUL on the GBR and the implementation of TSM measures at specific impact locations would mitigate project-related traffic impacts.

With implementation of the proposed traffic mitigation plan, two impacts on ramps in the New Jersey Turnpike Interchange 13 complex and seven impacts on the SIE would not be effectively mitigated. At these locations, impacts could be mitigated only in the context of broader transportation improvements that may be studied by the New Jersey Turnpike Authority and New York State Department of Transportation, respectively; towards that end, the Port Authority will continue its ongoing coordination with those agencies.

Additional Comments – At the recent project meetings held with the Environmental Task Force and Technical Advisory Committee on October 14th and the Stakeholders Committee on October 15th, and at the Public Open House held in Elizabeth on October 21st, representatives of the City of Elizabeth stated the City's support for the proposed GBR project, given the Port Authority's stated commitment to implementation of the I-278 & U.S. Route 1&9 Interchange Improvements (Missing Link) project, which the City of Elizabeth has promoted to relieve ongoing traffic issues on Bayway Avenue and other nearby roadways, with or without the GBR project.

Additional information regarding project impacts and mitigation, including structure conceptual design and traffic details, were presented at the recent meetings. As the NJHPO was not at these meetings, I have attached a copy of the presentation slides used to describe the project and key impacts/mitigation measures for your information. The slides have also been posted on the project website at www.goethalseis.com; a summary of comments received at the Committee meetings and public open houses will be provided on the website in the near future.

The Louis Berger Group, Inc./Parsons Brinckerhoff, Inc. Joint Venture, the environmental consultant team assisting with preparation of the GBR EIS, is authorized to discuss technical matters directly with your agency during this consultation. You should, therefore, feel free to contact Deborah Van Steen at 973-407-1260 or Ken Hess at 973-407-1501 regarding any questions or comments concerning the enclosed reports. I can also be reached at 212-668-7021.

Thank you for your assistance in this undertaking. The USCG looks forward to your continued involvement in the EIS process and the associated Section 106 Consultation Process.

Subj: GOETHALS BRIDGE

Sincerely,



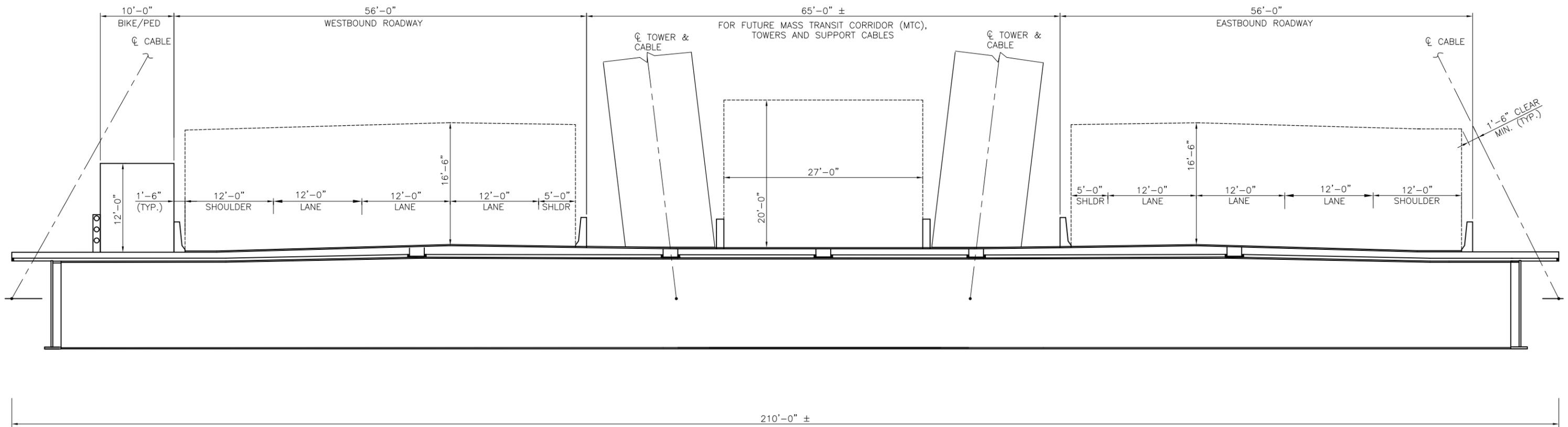
Gary Kassof
Bridge Program Manager
First Coast Guard District
By Direction of the District Commander

Enclosures:

- *Conceptual Cross-Section of Proposed GBR.*
- *Email of 9/24/08 with hyperlinks to press releases.*
- *Presentation Slides of the 2008 Public Outreach Meetings.*

Copy:

- Ruth L. Pierpont (NYSOPRHP)
- Allen Garneau (USCG)
- James Blackmore, Coleen Hopson (PANYNJ)
- Ken Hess, Judith Versenyi, Deborah Van Steen, Susan Grzybowski, JP Magron (Berger/PB)



SECTION AT MAIN SPAN
(WITH FUTURE MASS TRANSIT CORRIDOR)

N.T.S

Magron, Jean Philippe

From: Van Steen, Deborah
Sent: Tuesday, October 21, 2008 12:32 PM
To: Magron, Jean Philippe
Subject: FW: Goethals News Story Links

JP:

Copy of my email to Andrea

Deborah Baldwin Van Steen
Architectural Historian
THE Louis Berger Group, INC.
412 Mount Kemble Avenue
Morristown, New Jersey 07960-6654
dvansteen@louisberger.com
Cell: 201.341.1890
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Mailing Address:
The Louis Berger Group, Inc.
412 Mount Kemble Avenue
PO Box 1946
Morristown, New Jersey 07962

From: Van Steen, Deborah
Sent: Wednesday, September 24, 2008 1:32 PM
To: 'Andrea Tingey'
Cc: Hess, Kenneth
Subject: FW: Goethals News Story Links

Andrea:

Re: Goethals Bridge Alternatives Analysis Report
Response to NJHPO comments

As requested, the Coast Guard has provided the following links with comments to the proposed bridge.

Deborah Baldwin Van Steen

11/4/2008

Architectural Historian
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412 Mount Kemble Avenue
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Mailing Address:
The Louis Berger Group, Inc.
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PO Box 1946
Morristown, New Jersey 07962

From: Hess, Kenneth
Sent: Wednesday, September 24, 2008 1:20 PM
To: Van Steen, Deborah
Subject: FW: Goethals News Story Links

[Port Authority announces plans to replace too-far-gone **Goethals Bridge**](#)

New York Daily News - New York,NY,USA

BY DOUG FEIDEN Say goodbye to the rusting and corroded **Goethals Bridge** - the atrocity on the Arthur Kill. The Port Authority Thursday released preliminary ...

[See all stories on this topic](#)

[Port Authority proposes new **Goethals Bridge**](#)

Staten Island Advance - SILive.com - Staten Island,NY,USA

by Staten Island Advance Graphics courtesy of Port AuthorityThe new **Goethals Bridge** will offer six 12-foot lanes with full shoulders in both directions. ...

[See all stories on this topic](#)

[Port Authority proposing a new **Goethals**](#)

The Star-Ledger - NJ.com - Newark,NJ,USA

by Rudy Larini/The Star-Ledger The aging **Goethals Bridge** linking Elizabeth to Staten Island will be replaced with a sleek new span under a proposal to be ...

[See all stories on this topic](#)

Magron, Jean Philippe

From: Van Steen, Deborah
Sent: Tuesday, December 09, 2008 5:24 PM
To: kathy.howe@oprhp.state.ny.us
Cc: Hess, Kenneth; Magron, Jean Philippe; Beadenkopf, Kristofer
Subject: Goethals Bridge
Follow Up Flag: Follow up
Flag Status: Red
Attachments: TravisBranchBridges.pdf

Re: **USCG**
Goethal's Bridge Replacement
Staten Island, Richmond County, NY
04PR03162

Dear Kathy:

The attached technical memo briefly describes four additional historic resources, not previously submitted to your office for review. The bridges are located in the Goethals Bridge Replacement architectural APE and carry the Staten Island Railroad Travis Branch. Three of the bridges are highway structures, Forest Avenue (Gulf Avenue), Route 278, and Goethals Road North. The fourth bridge spans Old Place Creek. One of the bridges, Travis Branch over Route 278, would be demolished as part of the proposed project. All of the bridges are simple girder structures that are believed to date from around the mid-twentieth century. The bridges are representative structures of their type and do not appear to embody distinctive design or engineering features that would qualify them for listing on the National Register, and as such are recommended not eligible.

As these structures were not previously field surveyed, online images have been used in preparation of this transmittal and apologize for their poor quality. Please let me know if better documentation or additional information is requested. I look forward to your review. Thank you for your assistance; as always, it is greatly appreciated.

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12/11/2008

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Morristown, New Jersey 07962

GOETHALS BRIDGE REPLACEMENT

STATEN ISLAND RAILROAD TRAVIS BRANCH BRIDGES

STATEN ISLAND, RICHMOND COUNTY, NEW YORK

Prepared for:
The United States Coast Guard



Project Applicant:
The Port Authority of New York and New Jersey



Prepared by:
The Louis Berger Group, Inc./Parsons Brinkerhoff JV



December 2008



Summary

The Staten Island Railroad (SIRR) Travis Branch extends from the Arlington Yard south through the Goethals Bridge study area, crossing the Goethals Bridge approach approximately 600 feet west of the toll plaza before continuing south to the former Staten Island Edison Corporation Arthur Kill Station at Travis.

The Travis Branch crosses over Old Place Creek and three roadways, Goethals Road North, Route 278, and Forest Avenue (Gulf Avenue), within the Goethals Bridge Architectural APE (Plates 1-4). The four bridges are believed to be 50 years or older and were not previously submitted to the New York State Office of Parks, Recreation and Historic Preservation (NYSOPRHP) for evaluation. At least one of the bridges, the Travis Branch over Route 278, will be replaced as part of the proposed project.

The bridges are of similar construction, simple girder railroad bridges with ballasted decks, and appear to date to approximately the same period of construction. The bridges have concrete abutments. The Travis Branch over Route 278 (also called the Travis Branch Overpass) is supported by three open arch piers that straddle the two eastbound and two westbound lanes. The bridges are briefly described, including photos accessed from online mapping sites, on the following pages.

Historical Overview

The SIRR Travis Branch, initially a spur of the Baltimore and Ohio Railroad (B&O), was constructed between 1917 and the 1937 (Sanborn 1917, 1937-38). This short section of track initially extended south from the Staten Island Railroad at the Arlington Yards to the Gulf Oil New York Refinery and tank farm at Gulfport and Bloomfield. The spur was later extended further south to the Staten Island Edison Corporation Arthur Kill Generating Station at Travis. The generating station plant No. 1 opened in 1948 (Con Edison Newsroom, online). At Travis the spur connected the Edison power station and the Fiore Brothers Coal company, providing delivery of coal by railcar (Sanborn 1951). The spur line continued to serve as an industrial spur line along the east banks of the Arthur Kill until loss of industrial customers and coal transports led to closure of the line.

The SIRR and spur tracks were abandoned in 1990 and 1991 by its operator, CSX Transportation. In 1994 the State of New Jersey and the City of New York acquired their respective segments of the track; however, from the time of the CSX abandonment until the reactivation by New York City Economic Development Corporation (NYCEDC), the spur remained abandoned with no service over a period of about 15 years.

In 1994 plans were announced by Mayor Bloomberg and Governor Pataki that the NYCEDC and the Port Authority of New York and New Jersey would partner to reactivate the Travis Branch of the SIRR for freight service. The proposal included rehabilitation of the railroad bridges, replacement of three existing timber trestles with modern concrete structures, expansion of the Arlington Yard, construction of a new WYE connection between the SIRR Main Line and the Travis Branch, and 6,500 feet of new

track on the Travis Branch. The improvements included extension of the Travis Branch from the former generating station in Travis to the site of the NYC sanitation transfer station built at Fresh Kills. The reactivation project provides direct rail service to the New York Container Terminal at Howland Hook Marine Terminal at the north, the Department of Sanitation Fresh Kills Transfer Facility and Visy Paper on the Travis Branch, and other industries served by the Main Line or extended Travis Branch. Work on the seven-mile spur was completed in 2006 (NYCEDC).

Eligibility

The bridges are representative of twentieth-century simple girder structures and do not appear to be significant in terms of their design or engineering. The bridges over Forest Avenue (Gulf Road) and Goethals Road North have one span and typical concrete abutments and wing walls. Likewise, the Travis Branch Overpass at Route 278, although longer with multiple spans, employs simple girder bridge construction and does not appear to have architectural or engineering significance. As the oldest bridges on the Travis Branch were recently replaced with modern structures, the bridge over Old Place Creek with its spider-like pilings appears to embody design characteristics of a less typical nature.



Plate 1. Aerial View, Travis Branch Bridges within the APE. Microsoft Live Search.

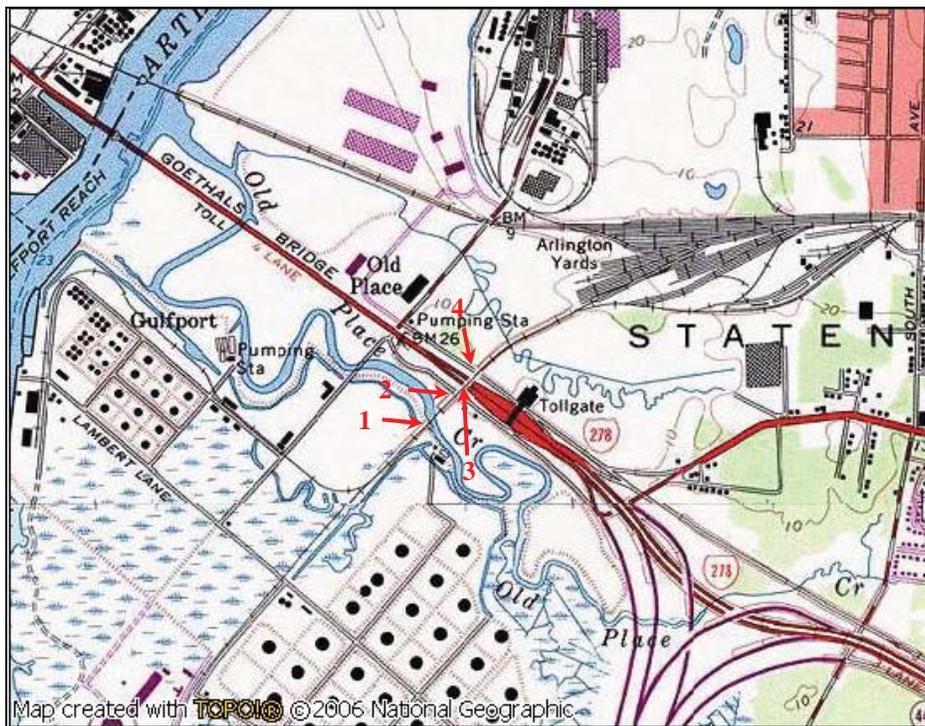


Plate 2. USGS Map, Travis Branch Bridges within the APE

1. Travis Branch over Old Place Creek
2. Travis Branch over Forest Avenue (Gulf Avenue)
3. Travis Branch over Route 278
4. Travis Branch over Goethals Road North



Plate 3. Travis Branch Highway Bridges (left to right Forest/Gulf Avenue, Route 278, and Goethals Road North. Aerial View North. Microsoft Live Search Maps.



Plate 4. Aerial Overview—Route 278 Overpass, Travis Branch over Old Place Creek, and Goethals Bridge Toll Plaza. View West. The Port Authority of NY & NJ.

1. Travis Branch over Old Place Creek (Plates 5 and 6)

This structure carries a single track over Old Place Creek, south of Forest Avenue and Route 278. The bridge has a simple deck girder superstructure with a ballasted deck, supported by two concrete piers and low abutments. The piers consist of concrete pads that rest on spidery grouped piles, or legs, driven into the stream bed.



Plate 5. Travis Branch over Old Place Creek. View North. Microsoft Live Search Maps.



Plate 6. Travis Branch over Old Place Creek. View South. Microsoft Live Search Maps.

2. Travis Branch over Forest Avenue (Gulf Avenue) (Plates 7-9)

This single-span through girder bridge carries the Travis Branch over a two-lane roadway, parallel to and south of Route 278. The bridge has a ballasted deck, concrete abutments, and wing walls.



Plate 7. Travis Branch over Forest Avenue (Gulf Avenue). Google Street View.



Plate 8. Travis Branch over Forest Avenue (Gulf Avenue). Google Street View.



Plate 9. Abutment, Travis Branch over Forest Avenue (Gulf Avenue). Google Street View.

3. Travis Branch over Route 278 (Travis Branch Overpass) (Plates 10-14)

The overpass carries the Travis Branch over Route 278, a divided four-lane highway, west of the toll plaza and east of Goethals Bridge. The structure is a simple through girder bridge with a ballasted deck. The bridge appears to have four spans and is supported by three single-arch piers, concrete abutments, and stepped wing walls. The center pier, sited between the east- and westbound lanes, is the largest, double the size of the outer piers.



Plate 10. Travis Branch over Route 278. Google Street View.



Plate 11. Travis Branch over Route 278. Google Street View.



Plate 12. Abutment, Travis Branch over Route 278. Google Street View.



Plate 13. Travis Branch over Route 278. Google Street View.



Plate 14. Historic View n.d., Travis Branch over Route 278 and Goethals Road North. The Port Authority of NY & NJ.

4. Travis Branch over Goethals Road North (Plates 15-18)

This single-span through girder bridge carries the Travis Branch over a two-lane roadway, parallel to and north of Route 278. The bridge has a ballasted deck, concrete abutments, and stepped concrete wing walls.

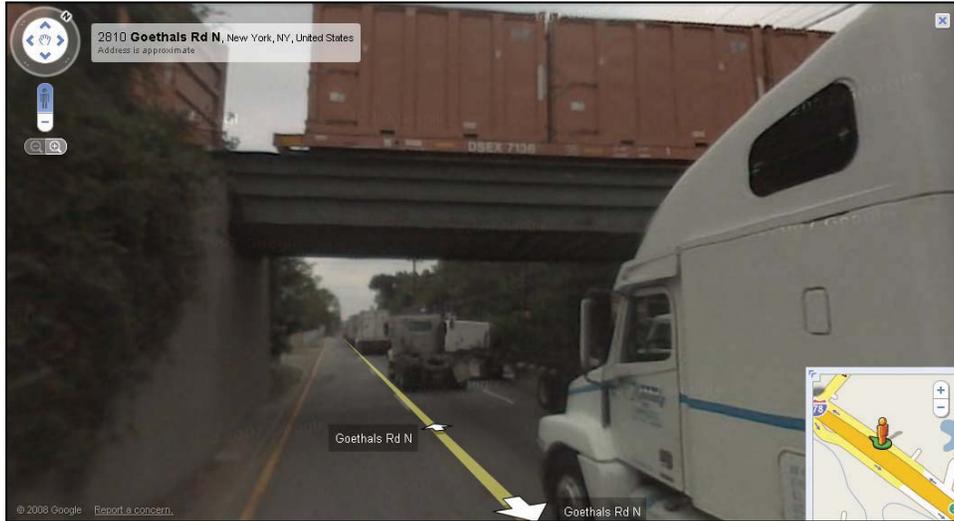


Plate 15. Travis Branch over Goethals Road North. Google Street View.

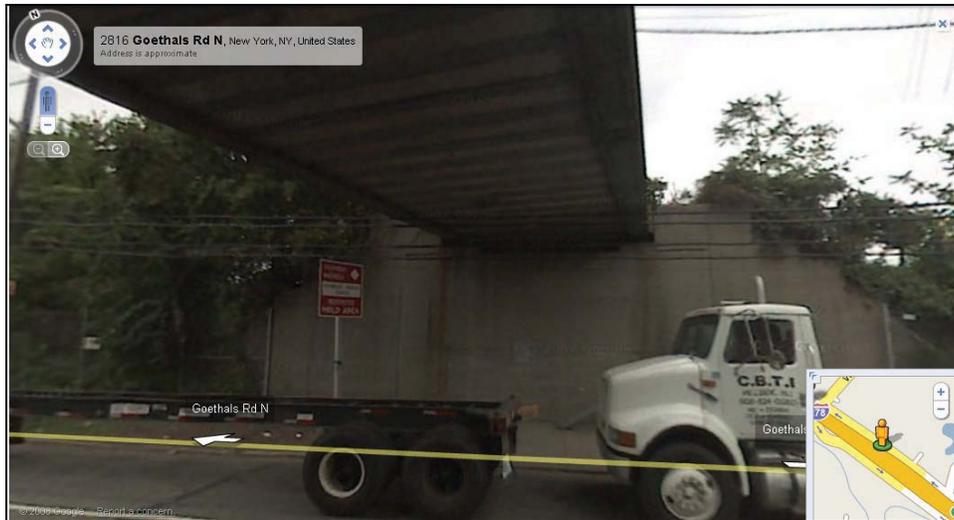


Plate 16. Abutment, Travis Branch over Goethals Road North. Google Street View.



Plate 17. Travis Branch over Goethals Road North. Google Street View.

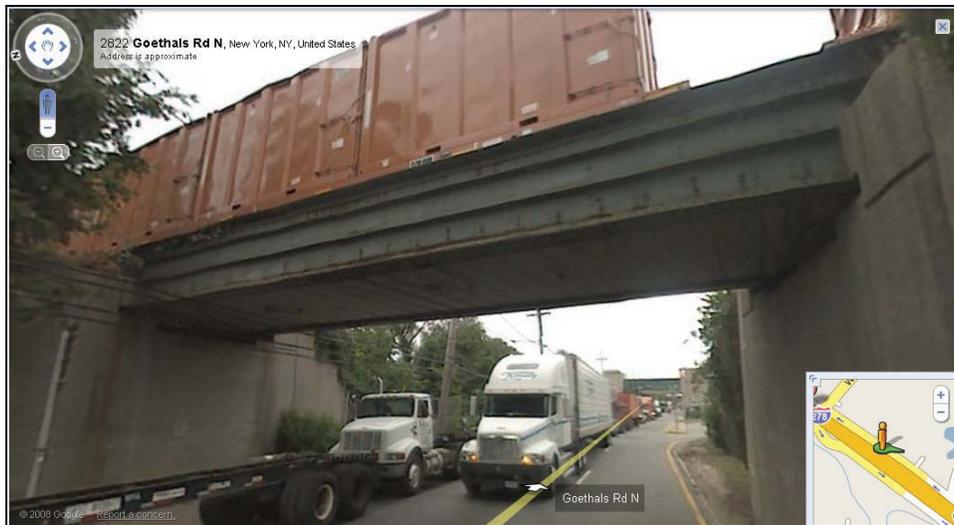


Plate 18. Travis Branch over Goethals Road North. Google Street View.



New York State Office of Parks, Recreation and Historic Preservation

Historic Preservation Field Services Bureau • Peebles Island, PO Box 189, Waterford, New York 12188-0189

518-237-8643

www.nysparks.com

David A. Paterson
Governor

Carol Ash
Commissioner

December 19, 2008

Deborah Baldwin Van Steen
Architectural Historian
The Louis Berger Group, Inc.
412 Mount Kemble Avenue
Morristown, NJ 07960-6654

Re: USCG
Goethal's Bridge Replacement
Staten Island, Richmond County, NY
04PR03162

Dear Ms. Van Steen:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO) concerning the four Staten Island Railroad Travis Branch Bridges located in the Goethals Bridge Replacement architectural APE. We have reviewed your Technical Memo in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966.

Based on the documentation provided, the SHPO concurs with your finding that the Travis Branch bridges over Old Place Creek, Forest Avenue (Gulf Avenue), Route 278, and Goethals Road North do not appear to be significant in terms of their design or engineering. It is the opinion of the SHPO that the bridges do not meet the criteria for listing to the National Register.

We look forward to ongoing consultation for this project. If you have any questions regarding this review, please call me at (518) 237-8643, ext. 3266. Please refer to the Project Review (PR) number noted above in any correspondences.

Sincerely,

Kathleen A. Howe
Historic Preservation Program Analyst



Memorandum

Subject: Section 106 Consultation Pre-MOA Meeting for
Goethals Bridge

Date: April 20, 2009
16591

From: Gary Kassof, USCG-Bridge Program Manager

Reply to: dpb
Attn. of: Kassof
212 668-7021

To:File

Attendees:

Andrea Tingey, Michelle Hughes (NJHPO)
James Warren (NYSOPRHP)
Gary Kassof (USCG)
Coleen Hopson (PANYNJ)
Ken Hess, Deborah Van Steen (Berger/PB JV)

1. On 20 April 2009, I attended subject meeting for preliminary discussions on the Memorandum of Agreement (MOA) and other issues relative to the GBR Project. Meeting was held at NJHPO offices in Trenton, NJ. NYSOPRHP representative participated via telephone conference. Representative of PANYNJ as well as representatives of the consultant team (Berger/PB JV) also attended.
2. Discussions roughly followed agenda developed by the consultant's cultural resources professional and also an issues outline prepared by Andrea Tingey of NJHPO. After introductions and a brief summary of project status, discussions regarding critical MOA issues ensued.
3. The following was discussed:
 - a. Cultural resources impacts revolve around removal of the Goethals Bridge, eligible for listing in the National Register, and aesthetic impacts on the adjacent AKRR Bridge and Staten Island RR Historic District. Jim Warren offered that NYSOPRHP does not consider aesthetic impacts to the AKRR Bridge and SIRR District to be adverse but will defer to NJHPO since they are primarily in New Jersey and NJHPO considers the impact to be adverse.
 - b. Two aspects of significance related to the Goethals Bridge were discussed including:
 - i) Level of Significance and ii) Period of Significance.
 - i. The Level of Significance must consider whether the Goethals Bridge is of State or National Significance. Criteria of significance refer to Criterion A (transportation importance as the first bridge to carry vehicular traffic between NY & NJ) and Criterion C (engineering importance for innovative construction

methods). Additionally, NJHPO suggested that Criterion C be expanded to include the Goethals Bridge as “the work of a master” for its association with the bridge engineers Othmar Ammann (construction supervisor) and J.A.L. Waddell (bridge designer). The consultants’ cultural resources specialist (Deborah Van Steen) considers the bridge to have a State level of significance. NYSOPRHP concurs. However, NJHPO differs and feels that Ammann and Waddell’s work should be considered as the work of a master and combined with the influence and innovation contributed by the PANYNJ, the Level of Significance of this resource is more likely National. NJHPO also cited the Goethals Bridge (and Outerbridge Crossing) as the first bi-state commission projects that paved the way for other bi-state transportation projects by the PANYNJ should be considered in the evaluation of their significance.

- ii. The Period of Significance can potentially be viewed as from construction (1928) until demolition (anticipated 2014-15). NYSOPRHP suggested this period. Another concept is dividing the bridge period into pre- and post-Verrazano-Narrows Bridge (VNB) construction. Clearly, the importance of traffic volumes frequenting the Goethals Bridge greatly increased with completion of the VNB, which established a continuous highway connection between the City of New York, Long Island, and New Jersey. The development of Staten Island and the further increase in traffic volumes across the Goethals Bridge was another outcome of the VNB construction. However and as noted by the consultant, the Period of Significance may be associated more with the pre-VNB period. One concern expressed by NJHPO involves the level of scrutiny required to meet the exceptional importance for significance within the past 50 years (Criteria Consideration G).
- c. Mitigation – A list of potential mitigation measures suggested by NJHPO and the consultant were discussed:
 - i. Historic American Engineering Record (HAER) photo-documentation from the 1990’s is good but was predicated upon retention of the existing bridge as part of the twin bridge concept. HAER documentation would need to be expanded
 - ii. Market viability was discussed but all agreed that prospect of selling (or donating) the structure was all but nil. This was dropped as a viable mitigation option.
 - iii. Enhanced maintenance for Outerbridge Crossing (OC) as sister structure to the Goethals Bridge. PANYNJ may consider OC for replacement as well in the future owing to its growing obsolescence. No guarantee that OC would or could be preserved in perpetuity. PANYNJ has ongoing maintenance program that seeks to and succeeds in maintaining the OC as a viable transportation crossing while considering the cultural importance of the structure.
 - iv. Archiving components of the existing structure in a public forum where it could be readily available for viewing by a large segment of the public, if practical.
 - v. Documentary about bridge history, demolition, new bridge construction via web-based platform, cable TV, or educational outlets
 - vi. Conduct a Multiple Property survey and/or National Register nomination of all PANYNJ bridges- Preservation plans, bridge documentation etc.
4. We then discussed the timing/scheduling of the DEIS and the progress of the Section 106 consultation process. Coordination with the Advisory Council on Historic Preservation

(ACHP) was recommended at this stage. It is important to provide the ACHP with the summary documentation and ask whether they elect to be signatory to the eventual MOA. Providing the summary documentation (or making it available on the project website) is also important to gather additional useful information and determine who should be other consulting/interested parties in the Section 106 process. Both SHPOs suggested that the questions of Level and Period of Significance should be resolved prior to submission to the ACHP, most importantly the Level of Significance.¹ It was decided to consult with the SHPOs regarding Level of Significance for concurrence. The SHPOs indicated a maximum 30 day review once the significance evaluation is received. Meanwhile, it was agreed that the DEIS should reflect the consultation, but its release can proceed before the MOA is fully prepared and signed.

5. **Next Steps:**

- a. USCG and Berger/PB JV to prepare Level and Period of Significance assessment for review and concurrence by SHPOs. Both SHPOs indicated a maximum 30-day review period but will strive for less time.
- b. USCG and Berger/PB JV to formalize list of consulting and interested parties, as to also determine who will be the future signatories of the MOA. To be formalized in coordination with both SHPOs.
- c. USCG and Berger/PB JV to prepare summary documentation for transmittal to ACHP (with concurred Level and Period of Significance).
- d. Compilation of summary documentation to be linked to project website.
- e. Concurrently to above, all consulting and interested parties will be advised of web-based documentation and their inputs should then be requested.

¹ The degree of significance of the bridge is being discussed to more fully assess the extent of mitigation that will be appropriate under the Proposed Project and that will be stipulated in the future MOA.



16590
May 13, 2009

Charlene Vaughn
Office of Federal Agency Programs
Advisory Council on Historic Preservation
Old Post Office Building
1100 Pennsylvania Avenue, NW, Suite 809
Washington, DC 20004

Subject: Goethals Bridge Project, City of Elizabeth, Union County, NJ and Staten Island, Richmond County, NY: Notification of Adverse Effect and Invitation to Participate in Section 106 Process

Dear Ms. Vaughn,

Pursuant to 36 CFR § 800.6(a)(1), the Department of Homeland Security (DHS) is notifying the Advisory Council on Historic Preservation (ACHP) that, in consultation with the New Jersey Historic Preservation Office (NJHPO) and the New York State Office of Parks, Recreation, and Historic Preservation (NYSOPRHP), a determination of adverse effect has been made regarding the proposed Goethals Bridge Project between Elizabeth, New Jersey, and Staten Island, New York. The NJHPO determination was identified by correspondence dated May 21, 2008. The NYSOPRHP determination was identified on July 11, 2008. The Port Authority of New York and New Jersey (PANYNJ) is the project sponsor, and the United States Coast Guard (USCG) is the lead Federal agency for consultation under Section 106 of the National Historic Preservation Act (NHPA) and for the preparation of the Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act (NEPA) of 1969. Public outreach required by the NHPA and the NEPA have and will be conducted concurrently.

Initiation letters sent to the NJHPO and NYSOPRHP in June 2005 began the official Section 106 consultation process which has been ongoing ever since. A summary of the project background as well as findings and consultations to date is attached in the Executive Summary Memorandum. However, copies of all of the detailed reports and correspondence are also provided in the accompanying CD-ROM for your convenience. This CD-ROM includes:

1. Historic Architectural Resources Study Report–New Jersey (July 2008),
2. Historic Architectural Resources Survey Report–New York (August 2007),
3. New York State Historic Resource Inventory Form–Staten Island Railway Lift Truss Bridge (May 2008)
4. Phase I Archaeological Report (August 2007)
5. Historic Resources Effects Assessment (July 2008)
6. Historic Bridge Alternatives Analysis Report (August 2008)
7. Related Section 106 Correspondence.

In addition, a website (<http://www.goethalseis.com/>) has been established, which includes description of the project, public outreach and newsletters, as well as other EIS and Section 106

related documentation. It should be noted that in October 2008, a series of outreach meetings (including public agencies, other stakeholders and the general public) was held at which the recommendation of adverse effect was first publicly presented.

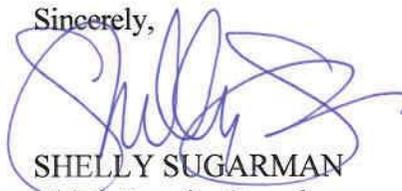
Preliminary discussions with both NJHPO and NYSOPRHP to clarify the level and period of significance of the bridge as well as potential mitigation have commenced, including a recent meeting on April 20, 2009. Based on the USCG's coordination with these agencies, the following milestones have been reached:

- A finding of adverse effect relates to three historic architectural resources: the Goethals Bridge, the Staten Island Railroad Historic District, and the Staten Island Railway Lift Truss Bridge over the Arthur Kill. Presently additional information to clarify level and period of significance of the Goethals Bridge is being compiled for NJHPO. Once concurrence from both NJHPO and NYSOPRHP is achieved, "Summary Documentation" will be transmitted to the ACHP. Concurrently we are formalizing a list of consulting and interested parties for review by NJHPO/NYSOPRHP in advance of the preparation for a Memorandum of Agreement (MOA) and stipulation of mitigation measures.
- Both NJHPO and NYSOPRHP have concurred that the project would not result in impacts to archaeological sites. The NYSOPRHP has requested additional archaeological field testing if either of the two northern alignments is chosen as the environmentally-preferred alternative pursuant to the NEPA process.

Under the NEPA process and the ongoing public outreach, formal public meetings will be held in early summer 2009 subsequent to the release of the Draft EIS and start of the public comment period. Dates for these meetings will be selected in the near term. Such meetings will also provide opportunities for involving the public in the Section 106 process, pursuant to 36 CFR § 800.8 for "Coordination with the National Environmental Policy Act."

At this time, the DHS requests whether the ACHP wishes to participate in the 106 process pursuant to 36 CFR § 800.6(a) (1) as a signatory to the MOA. Thank you for your assistance in this undertaking. If you have any questions or require additional information, please contact me at 202-372-1521.

Sincerely,



SHELLY SUGARMAN
Chief, Permits Branch
USCG Bridge Program

- Enclosures: (1) Executive Summary Memorandum for the Goethals Bridge Replacement and its respective NEPA Process and Section 106 Consultation
(2) Accompanying CD-ROM with all past reports and correspondences related to the Section 106 Consultation

Copy:

Dan Saunders (NJHPO)
Andrea Tingey (NJHPO)
Ruth Pierpont (NYSOPRHP)
James Warren (NYSOPRHP)
Teresa Pohlman (DHS)
David Reese (DHS)
Gary Kassof (USCG-D1)
Hala Elgaaly (USCG-HQ)
Ed Wandelt (USCG-HQ)
Coleen Hopson (PANYNJ)
Ken Hess (Berger/PB)
Judith Versenyi (Berger/PB)
Susan Grzybowski (Berger/PB)
Kris Beadenkopf (Berger/PB)
Deborah Van Steen (Berger/PB)

MEMORANDUM

GOETHALS BRIDGE EIS

| | |
|-----------------|---|
| DATE: | May 13, 2009 |
| TO: | Mr. Reid J. Nelson Office of Federal Agency Programs Advisory Council on Historic Preservation Old Post Office Building 110 Pennsylvania Avenue, NW, Suite 809 Washington, DC 2004 |
| FROM: | Gary Kassof Bridge Program Manager First Coast Guard District One South Street Battery Building New York, NY 10004 |
| SUBJECT: | Executive Summary Memorandum for the Goethals Bridge Project and its respective NEPA Process and Section 106 Consultation. |

PROJECT BACKGROUND

The Port Authority of New York and New Jersey (PANYNJ), the project sponsor, has proposed to replace the existing Goethals Bridge, which provides a direct connection over the Arthur Kill between the Borough of Staten Island, New York, and the City of Elizabeth, New Jersey. The Goethals Bridge is a crucial link in the Port Authority's bi-state system of bridges and tunnels, as well as the entire New York / New Jersey metropolitan area's regional highway network. In Staten Island, the Port Authority owns and operates three bi-state bridges that provide direct access between Staten Island, New York and New Jersey. Referred to collectively as the Staten Island Bridges system, the system includes the Goethals Bridge, the Outerbridge Crossing and the Bayonne Bridge. The remaining bi-state transportation network of the Port Authority is comprised of the George Washington Bridge as well as the Holland and Lincoln Tunnels.

Built in the 1920s and completed in 1928, the Goethals Bridge was originally designed to accommodate increasing bi-state automobile and truck traffic between Staten Island and New Jersey following World War I. The opening of the Verrazano-Narrows Bridge in 1964 created a highly used travel corridor from New Jersey through Staten Island to Brooklyn, Queens, and the rapidly developing counties of Nassau and Suffolk on Long Island. As a result of the Verrazano-Narrows Bridge, traffic volumes on the Goethals Bridge have increased as it has become part of the New York Metropolitan circumferential roadway system. Nowadays, the Goethals Bridge is a primary path of travel that serves as a link along Interstate 278, which begins at U.S. Route 1/9 in Linden, New Jersey and continues across northern Staten Island as the Staten Island Expressway, and then continues into Brooklyn and Queens, before it eventually terminates at I-95 in the Bronx. It also provides a direct connection to the New Jersey Turnpike

MEMORANDUM

GOETHALS BRIDGE EIS

(Interstate 95) at Interchange 13 in New Jersey and access via I-278 to the West Shore Expressway, the major north-south highway on Staten Island. Figure 1 depicts the regional location of the Goethals Bridge within the New York / New Jersey metropolitan area.

By the mid-1980s, the bridge had become functionally and physically obsolete as original design features no longer met current standards and added to deteriorated traffic conditions and relatively higher accident levels. In the early 1990s, the Port Authority undertook an alternatives analysis of potential improvements for the Staten Island Bridges. As a result of those studies, the Port Authority proposed the construction of a parallel bridge operating in conjunction with the existing bridge to enhance the bridge's capacity to meet the future transportation needs as well as the bridge's obsolescence. This proposal then became known as the Staten Island Bridges Program (SIBP) whose Final Environmental Impact Statement (FEIS) was released in 1997. After much study, this proposal of the SIBP FEIS resulted in unresolved issues and it was not advanced to the approval stage.

As anticipated, the need for modernization of the Goethals Bridge continued. Reassessment of the condition of the existing Goethals Bridge at this time concluded that rehabilitation of the existing bridge, which would be necessary to enhance structural integrity, would incur increasing life-cycle costs associated with long-term maintenance and repair. Therefore, the Port Authority is seeking a total replacement of the existing Goethals Bridge in order to best meet the need for the bridge modernization. In accordance with the requirements of the National Environmental Policy Act (NEPA) of 1969, as amended¹, the USCG as lead Federal agency issued a Notice of Intent (NOI) to prepare an EIS for the Proposed Project, which was published in the *Federal Register* on August 10, 2004.

A Draft EIS has been prepared to examine the proposed transportation improvements associated with replacement of the Goethals Bridge and addresses the social, economic, cultural, environmental and transportation impacts associated with the Proposed Project. It is anticipated that this DEIS will be available for public review in June 2009. In addition to the No-Build Alternative, the Draft EIS is evaluating four alternative alignments which would all result in the demolition of the existing Goethals Bridge. More details on the Proposed Project's purpose and need, alternative analysis, and description are presented below.

Concurrent to the NEPA process and since June 2005, the USCG has initiated consultation with the NJHPO and NYSOPRHP on matters involving cultural resources, pursuant to Section 106 of the National Historic Preservation Act (NHPA) and associated implementing regulations (*Title 36 CFR § 800*).

¹ As the Proposed Project requires a USCG Bridge Permit for the construction of a bridge across the Arthur Kill, a navigable water of the United States, such action constitutes a major federal action triggering compliance with the requirements of NEPA, with the USCG serving as the lead Federal agency for the NEPA process.



Legend

- Roads**
- Highways
 - Secondary Roads
 - Airports
 - Railroad

Goethals Bridge Replacement EIS

FIGURE 1
Regional Location

United States Coast Guard

MEMORANDUM

GOETHALS BRIDGE EIS

PURPOSE AND NEED OF THE PROPOSED PROJECT

With the bridge's deteriorating structural integrity, functional and physical obsolescence (i.e., substandard 10-foot-wide lanes - two in each direction - with no emergency shoulders), escalating maintenance requirements, emergence of E-ZPass use and increasing traffic volumes, post-9/11 security needs at critical interstate links (such as the Goethals Bridge in the region's transportation network), reactivation and expansion of the area's port facilities (notably the New York Container Terminal at Howland Hook, and consequent increases in truck traffic), and other transportation projects in the bridge's vicinity and in the region, the Proposed Project seeks to provide for a modernized Goethals Bridge crossing that will achieve the following goals:

- address design deficiencies that make the existing span functionally obsolete;
- enhance structural integrity and reduce life-cycle cost concerns with the existing bridge;
- provide transportation system redundancy;
- improve traffic service on the bridge and its approaches;
- provide safer operating conditions and reduce accidents on the bridge;
- provide for safe and reliable truck access for regional goods movements; and
- provide for potential future transit in the corridor.

ALTERNATIVES ANALYSIS FOR THE PROPOSED PROJECT

Project goals, identified above and reviewed through the NEPA EIS scoping process, served as the basis for: 1) identifying potential project alternatives; and 2) defining criteria and related performance measures that were used to select a wide range of potentially reasonable and feasible options for achieving the project's goals, to address the project purpose and need, and to be carried forward for detailed evaluation in the Draft EIS. This alternatives screening process was supplemented by inputs from agency coordination and public outreach efforts, including the participation of the NYSOPRHP and NJHPO. During this screening effort, both the "Rehabilitation Alternative of the Existing Goethals Bridge" and the "Modified Rehabilitation Alternative" (concurrent with construction of a new parallel bridge) were also identified and evaluated, as defined under the *Secretary of Interior's Standards for Rehabilitation (Title 36 CFR §67)*, but were dismissed and not further advanced for detailed evaluation in the Draft EIS.²

A set of preliminary alternatives were identified on the basis of several factors, including: input received during the agency and public scoping process in 2004; review of past studies of the Goethals Bridge corridor and the region served by the three Staten Island Bridges; and consideration of projected traffic and transportation conditions in the Goethals Bridge corridor. Potential solutions that would not satisfy at least one aspect of the purpose and need for the Proposed Project, and/or were not reasonable and feasible, on the basis of investigation, were not identified as preliminary alternatives for future consideration. Each preliminary alternative represented a single transportation mode, to enable discrete

² For more details on those two specific alternatives, see the accompanying CD-ROM report: *Historic Bridge Alternatives Analysis Report* submitted to both SHPOs in August 2008.

MEMORANDUM

GOETHALS BRIDGE EIS

consideration of its potential to address the project purpose and need, and was defined at a conceptual level, appropriate to the initial, qualitative screening. In addition to a “no-action” (No-Build) preliminary alternative, four categories of “build” alternatives were identified as potentially pertinent to the project purpose and need. In turn, a total of 15 preliminary “build” alternatives were identified; these are listed in Table 1.

Table 1 – “No-Action” and “Build” Preliminary Alternatives

| Categories of Preliminary Alternatives | Specifically-Identified Preliminary Alternatives |
|---|--|
| No-Action Alternative | <ul style="list-style-type: none"> • No Proposed Project ^(a) |
| Preliminary New-Crossing Alternatives | <ul style="list-style-type: none"> • Goethals Replacement Bridge South ^(b) • Goethals Replacement Bridge North ^(b) • Goethals Twin Replacement Bridges South ^(b) • Goethals Twin Replacement Bridges North ^(b) • Goethals Parallel Bridge South ^(c) • Goethals Parallel Bridge North ^(c) |
| Preliminary Transit Alternatives | <ul style="list-style-type: none"> • Bus Rapid Transit via New Goethals Bridge • Ferry Service, with or without a New Goethals Bridge |
| Preliminary Travel Demand Management Alternatives | <ul style="list-style-type: none"> • Temporal Shift, with or without a New Goethals Bridge • Temporal, Payment, and Mode Shift, with or without a New Goethals Bridge • Peak-Period Temporal Shift and Transit Support, with or without a New Goethals Bridge • High-Occupancy Toll Lane, with a New Goethals Bridge |
| Preliminary Freight-Movement Alternatives | <ul style="list-style-type: none"> • Highway Freight-Movement Enhancement Alternative, with a New Goethals Bridge • Rail Freight-Movement Enhancement Alternative, with or without a New Goethals Bridge • Intermodal Freight-Movement Enhancement Alternative, with or without a New Goethals Bridge |
| <p><i>Notes:</i></p> <p>(a) This assumes no implementation of Proposed Project, but it would still require future rehabilitation and routine maintenance activities due to the structural integrity of the 81-year old bridge. Pursuant to the <i>Secretary of Interior’s Standards for Rehabilitation</i>, this No-Action constitutes a similar alternative as the “<u>Rehabilitation Alternative of the Existing Goethals Bridge</u>”.</p> <p>(b) These four Preliminary New-Crossing Alternatives, as per their original nomenclature at the beginning of the project, constitutes the build bridge-replacement alternatives, which were eventually refined with a new nomenclature and advanced into the Draft EIS following completion the alternative screening process in 2007.</p> <p>(c) With a new 3-lane bridge parallel to either the north or south of the existing bridge, these two Preliminary New-Crossing Alternatives assume the rehabilitation and reconfiguration of the existing Goethals Bridge into a 3-lane thoroughfare. Pursuant to the <i>Secretary of Interior’s Standards for Rehabilitation</i>, these two alternatives constitute similar alternatives as the “<u>Modified Rehabilitation Alternative</u>”.</p> | |

Overall, the alternatives screening comprised two distinct phases of analysis:

MEMORANDUM

GOETHALS BRIDGE EIS

- 1) an initial, qualitative screening of preliminary alternatives; and
- 2) a comparative, quantitative screening of intermediate alternatives advanced from the initial screening, on the basis of which, project alternatives were selected for detailed evaluation in this DEIS.

While the detailed process and findings of such alternatives screening is available in the accompanying CD-ROM reports³, it was determined in 2007 that only the four Preliminary New-Crossing Alternatives (i.e., the bridge-replacement alternatives as listed in Table 1) be advanced for detailed evaluation in the Draft EIS. Inputs regarding the alternatives screening process obtained during the concurrent agency coordination and public outreach efforts were first publicly presented in June 2006, and then again as finalized alternatives in September 2007. The following No-Build Alternative and four Build Alternatives (with a revised nomenclature) were evaluated in the Draft DEIS:

- **No-Build Alternative** – Similar to the “no-action” preliminary alternative, the No-Build Alternative assumes that the Goethals Bridge is not replaced as proposed, and represents the future baseline against which the potential impacts resulting from each of the Build Alternatives are compared. This alternative also assumes that operation and maintenance of the Goethals Bridge and its approaches would continue in order to maintain this critical crossing in the interstate highway network, and that an increase in vehicle weights would continue to adversely affect the condition of the riding surface, deck slab and deck joints of the structure. As a result, the existing structure would require, at minimum, a full deck replacement and retrofit procedures for seismic upgrade within the next 7 – 10 years. This alternative also assumes that other projects and actions within the region that are programmed and committed will be implemented by 2034, the analysis year considered in the EIS.
- **New Alignment South** – This alternative assumes replacement of the Goethals Bridge with a new six-lane structure directly and entirely south of the existing structure’s alignment. The new bridge would be constructed in its entirety, after which the existing bridge would be demolished.
- **New Alignment North** – This alternative assumes replacement of the Goethals Bridge with a new six-lane structure directly and entirely north of the existing structure’s alignment. The new bridge would be constructed in its entirety, after which the existing bridge would be demolished.
- **Existing Alignment South** – This alternative assumes replacement of the Goethals Bridge with a new six-lane structure, one-half of which (i.e., the northern deck) would essentially be within the existing Goethals Bridge’s alignment, with the second half (i.e., the southern deck) adjacent to the existing alignment. The southern half of the new bridge would be constructed first, and then would temporarily accommodate both directions of traffic during demolition of the existing bridge and construction of the northern half of the new bridge within the existing span’s alignment. Following completion of all construction, each roadway deck would carry three lanes of traffic.
- **Existing Alignment North** – This alternative assumes replacement of the Goethals Bridge with a new six-lane structure, one-half of which (i.e., the southern deck) would essentially be within the

3 In accompanying CD-ROM, see *Appendix E of the Historic Bridge Alternatives Analysis Report* submitted to both SHPOs in August 2008.

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GOETHALS BRIDGE EIS

existing Goethals Bridge's alignment, with the second half (i.e., the northern deck) adjacent to the existing alignment. The northern half of the new bridge would be constructed first, and then would temporarily accommodate both directions of traffic during demolition of the existing bridge and construction of the southern half of the new bridge within the existing span's alignment. Following completion of all construction, each roadway deck would carry three lanes of traffic.

Plan views and cross-sections of those four Build Alternatives can be found on *Figures 5 and 6 of the Historic Bridge Alternatives Analysis Report* (see accompanying CD-ROM) submitted to both SHPOs in August 2008. Further details of the concept design and the various design components of the Proposed Project, which are applicable to all of the four Build Alternatives, are presented below.

DESCRIPTION OF PROPOSED PROJECT

Any of the four Build Alternatives would consist of a new cable-stayed bridge (see Figure 2) to replace the existing bridge. The new bridge, with a maximum out-to-out width of approximately 210 feet for its main span, would consist of the following components:

- six 12-foot-wide travel lanes, three on each roadway deck (i.e., one roadway for eastbound traffic and one roadway for westbound traffic);
- a 12-foot-wide outer shoulder on each roadway;
- a 5-foot-wide inner shoulder on each roadway;
- a minimum 10-foot-wide sidewalk/bikeway along the northern edge of the westbound roadway;
- a 65-foot-wide central area to be maintained between the eastbound and westbound decks to accommodate the provision of future transit service, should future conditions warrant inclusion of such service during the service life of the bridge;⁴
- a minimum navigational vertical clearance under the new bridge of 135 feet above mean high water (MHW), which is unchanged from the clearance of the existing bridge;
- a navigational horizontal clearance of 900 feet between the main piers so as to remove any structures from the Arthur Kill and its navigable channel; and
- a top elevation of 272 feet above mean sea level (MSL) at the bridge's main towers.

Under the Proposed Project, the existing Goethals Bridge, including its main truss span, and its New Jersey and New York approach spans and hollow abutments, would be entirely demolished and removed

4 The inclusion of a potential mass transit corridor between the two roadway decks of the bridge has been proposed in response to one of the identified Project Needs. The 27-foot-wide mass transit corridor is designed to provide sufficient horizontal and vertical clearances for either express bus or light-rail services, depending on which system may be warranted in the future as ridership forecasts dictate. It is anticipated that a separate environmental review process would be required for implementation of an actual mass transit system at a time when more specific plans and logical termini beyond the Port Authority's property limits would be conceptualized based on future ridership forecasts that would warrant the implementation of such transit services.

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either after construction of the new bridge is completed or partially completed, depending on the specific alignment alternative selected.



Figure 2 - Rendering of Cable-Stayed Concept Design

PUBLIC PARTICIPATION PLAN

The USCG has developed and implemented a public participation plan that will continue throughout the NEPA process. Its purpose is to inform, educate, and directly engage all those with an interest in the Proposed Project. This plan has been developed to conform to and satisfy the public participation requirements of NEPA⁵ as well as Section 106 of the NHPA⁶. The overriding goal of the plan is to engage a diverse group of public and agency participants to solicit relevant input and provide timely information throughout the environmental review process. In order to best accomplish this, the following objectives have been, and continue to be pursued:

- Establish ongoing, inclusive and meaningful two-way communication with stakeholders, agencies and the general public;
- Educate the public about the environmental review process and the role of government, stakeholders and the general public;

5 Pursuant to applicable Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 CFR §1500-1508).

6 Pursuant to 36 CFR § 800.8 (Coordination with the National Environmental Policy Act).

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- Coordinate outreach efforts with the USCG's internal protocols and policies for timely and relevant outreach activities; and
- Evaluate the effectiveness of outreach activities on a continual basis in order to refine this agency and public involvement plan, as necessary, and utilize the most effective techniques throughout this study.

To kick off the public involvement effort for this study and following issuance of the NOI in the *Federal Register*, the USCG hosted agency and public scoping meetings in Fall 2004 to solicit comments on the purpose and need for the Proposed Project, the types of preliminary alternatives to be considered for screening, and the technical evaluations to be undertaken, as well as to receive input on the issues and concerns that should be addressed in the Draft EIS. Prior to the agency scoping meeting, a Draft Scoping Document was prepared and distributed to federal, state, and local agencies in advance of the agency scoping meeting on September 14, 2004. A Public Scoping Information Packet was also prepared and distributed to public libraries and individuals on a project mailing list in advance of the two sets of public scoping meetings on October 5 and 6, 2004.

In recognition of the fact that community and government agency input plays an important role in this study as it progresses, the USCG has organized three committees to provide input throughout the preparation of the Draft EIS. These committees, which have been comprised of regulatory agencies, public officials and stakeholders, have included: the Technical Advisory Committee (TAC), the Environmental Task Force (ETF), and the Stakeholder Committee (SC).⁷ While several TAC/ETF/SC meetings were at key stages within the NEPA process, they were also supplemented by several public open houses, held respectively in New Jersey and in Staten Island, in order to provide a forum for discussion and inputs. Throughout the NEPA process, the public participation effort focused on gathering input and dispersing information about the following milestones:

- In March 2005, initial TAC/ETF/SC meetings were held for the presentation and interaction on the EIS status and summary of the scoping process, as well as on the preliminary alternatives identified, the alternatives screening methodology being utilized, and the existing environmental conditions.
- In June 2006, TAC/ETF/SC meetings were held for the presentation and interaction on the traffic modeling development and refinement that had occurred since the first meeting. They also presented the alternatives screening process and results, including a brief review of alternatives considered, the screening criteria used to assess them, the results of the comparative screening analysis, and the identification of alternatives to be advanced for more detailed evaluation in the Draft EIS. These committee meetings were also supplemented by a series of public open houses held in both states.

7 - The TAC is comprised of federal, state, regional, and local agencies to provide technical guidance on traffic/transportation and mobile-source air quality and noise issues and analyses.
- The ETF consists of federal, state, and local agencies to provide technical guidance on all environmental aspects of the project not covered by the TAC, including cultural resources. It includes both SHPOs.
-The SC is comprised of representatives from a cross-section of interests and organizations that could potentially be affected by the Proposed Project.

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- In September 2007, an interim combined TAC/ETF meeting was held for the presentation and interaction on the refined build alignments and respective screening, as well as on the revised alignment nomenclature developed since the previous meetings with both committees.
- In October 2008, the most recent TAC/ETF/SC meetings were held in preview of the preliminary environmental impacts and potential mitigation measures to be presented in the Draft EIS for the four Build Alternatives. While the discussions focused on the major environmental categories of concern (e.g., land use, socioeconomics, cultural and visual resources, water resources/biotic communities, contaminated materials, traffic, noise and air quality, etc.), it was also then that the issuance of finding of adverse effects, as determined in consultation with NYSOPRHP and NJHPO, was first publicly presented. Those committee meetings were also supplemented by a series of public open houses held in both states.

Beyond the scoping and committee meetings, a number of agency meetings were held on a topic-specific basis as warranted and project informational materials were released throughout the NEPA process. The meetings and correspondences that occurred with both SHPOs specifically pursuant to Section 106 Consultation are listed in the accompanying CD-ROM of *Related Section 106 Correspondence*. The informational materials were comprised of newsletters and meeting flyers (mailed to the project mailing list, and posted at libraries and community centers) as well as paid advertisements in local and regional newspapers (both in English and Spanish and in New York and New Jersey). This continued public participation is supplemented by a dedicated website (www.goethalseis.com) which has been in operation since the scoping process and has been updated routinely at study milestones. This website has included information about meeting opportunities, copies of meeting presentations, maps and charts, newsletters, and other project-related materials.

Following the Public Hearings on the Draft EIS, the ongoing public participation plan will continue at least until completion of environmental review under the NEPA process.

SECTION 106 CONSULTATION FOR THE PROPOSED PROJECT

Assessment of Archaeological Resources

Definition of the APE for Archaeological Resources. – The Area of Potential Effect (APE) for archaeological resources was determined in consultation with the NJHPO and NYSOPRHP.

The four Build Alternatives under the Proposed Project are located immediately north or south of the existing bridge and connect to New Jersey Turnpike Interchange 13 to the west and the Staten Island Expressway to the east, consistent with the existing crossing's termini. Based on the proposed alternatives and consideration of potential construction-related impacts, the APE was defined as 500 feet north and south from the centerline of the existing Goethals Bridge and I-278, extending west 500 feet from the edge of the overall footing of the interchange system in New Jersey and including the I-278 and West Shore Expressway (SR-440) Interchange in Staten Island as its eastern boundary. While the actual

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limits of ground disturbance associated with any of the four Build Alternatives would represent a significantly smaller portion of the APE and do not extend beyond the existing toll plaza on Staten Island, the APE for archaeological resources in both New Jersey and New York is depicted on Figure 3.

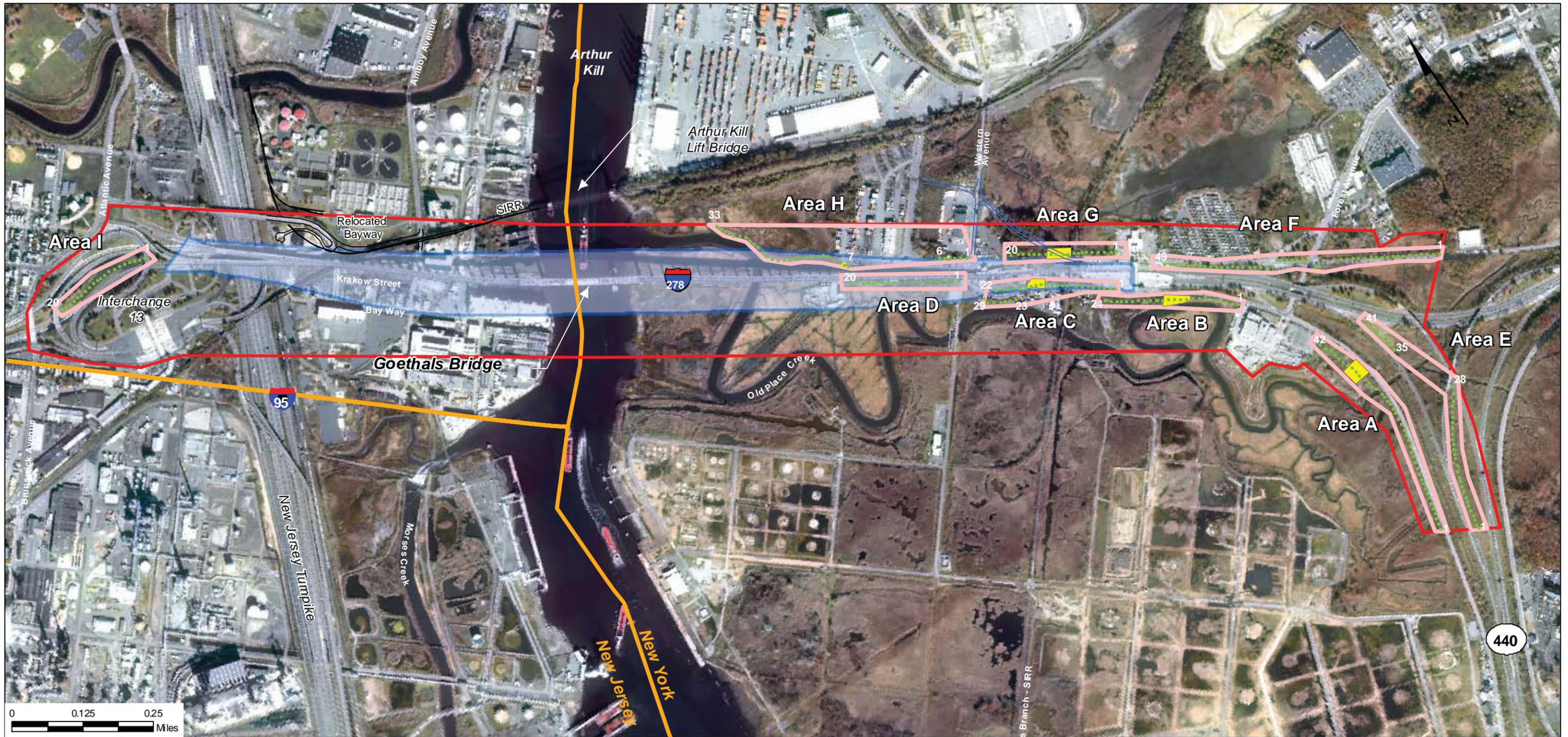
Assessment of Archaeological Resources. – Within the New Jersey archaeological APE, the results of the background research and field reconnaissance stages of the Phase I archaeological survey indicated that there are no archaeological sites documented within the archaeological APE and that much of the APE had been previously impacted by grading activities.⁸ Subsurface testing within the New Jersey archaeological APE did not identify any prehistoric archaeological resources. Moreover, no significant or recommended National or State Register-eligible historic archaeological deposits were recovered from within the New Jersey archaeological APE. Given these findings, it is concluded that the New Jersey archaeological APE does not contain any significant or recommended National or State Register-eligible prehistoric or historic archaeological resources that would be impacted by any of the four Build Alternatives being considered. The NJHPO has concurred that no further archaeological investigations are recommended within the New Jersey archaeological APE.

Within the New Jersey archaeological APE, the results of the background research and field reconnaissance stages of the Phase I archaeological survey indicated that eight prehistoric sites and six historic archaeological sites have been previously documented within a one-mile radius of the archaeological APE. The results of the subsurface testing within the New York archaeological APE revealed minimally disturbed soils underlying approximately 1 to 2 feet of fill and a scatter/intermixing of historic artifacts throughout most of the archaeological APE. In addition, seven prehistoric artifacts were identified within five distinct loci (i.e., marked as areas of archaeological sensitivity in Figure 3), but do not represent significant archaeological deposits, and therefore are not recommended as eligible for the National or State Registers. Subsurface testing also yielded no prehistoric features or dense prehistoric artifact deposits. As a result, the few scattered prehistoric materials discovered within the New York archaeological APE do not represent significant prehistoric archaeological deposits within the APE and are therefore not recommended as eligible for the National or State Registers. The NYSOPRHP concurred that no National Register Eligible Archaeological Resources were identified within the areas investigated within the New York archaeological APE.

Current Consultation Status for Archaeological Resources and Future MOA. – Both the NJHPO and NYSOPRHP have concurred that no National or State Register Eligible or Listed Archaeological Resources would be affected by any of the four Build Alternatives.⁹ In New Jersey, no further archaeological investigations are thus necessary for the advancement of the Proposed Project, no matter which of the four Build Alternatives will be ultimately selected as the environmentally-preferred alternative under the NEPA process. However in New York, additional archaeological investigations

8 See the accompanying CD-ROM report: *Phase I Archaeological Report* (August 2007).

9 See the accompanying CD-ROM report: *Historic Resources Effects Assessment* (July 2008).



Legend

- Excavated Shovel Test Pits
- Areas of Archeological Sensitivity
- Archaeologically Testable Areas
- Area of Potential Effect/Primary Study area
- Revised Archaeological APE Based upon Consultation with NYSOPRHP

| | Area | # of Shovel test Pits Excavated |
|------------|------|---------------------------------|
| New York | A | 40 |
| | B | 27 |
| | C | 39 |
| | D | 13 |
| | E | 41 |
| | F | 44 |
| | G | 24 |
| | H | 33 |
| New Jersey | I | 20 |

Goethals Bridge Replacement EIS

Figure 3
Archaeologically Tested and Sensitive Areas within the APE Study Area

United States Coast Guard

Source:
Basemapping: Port Authority of New York and New Jersey, 2002.

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would only be necessary within the area of relocated Goethals Road North if either of the two Northern Alternatives (i.e., Existing Alignment North or New Alignment North) was to be selected as the environmentally-preferred alternative under the NEPA process. Under those two Northern Alternatives, the current New York City street running directly to the north of the NY Approach Span would indeed have to be relocated further north to an undeveloped area where no archaeological field testing has yet been conducted.

Historic Architectural Resources

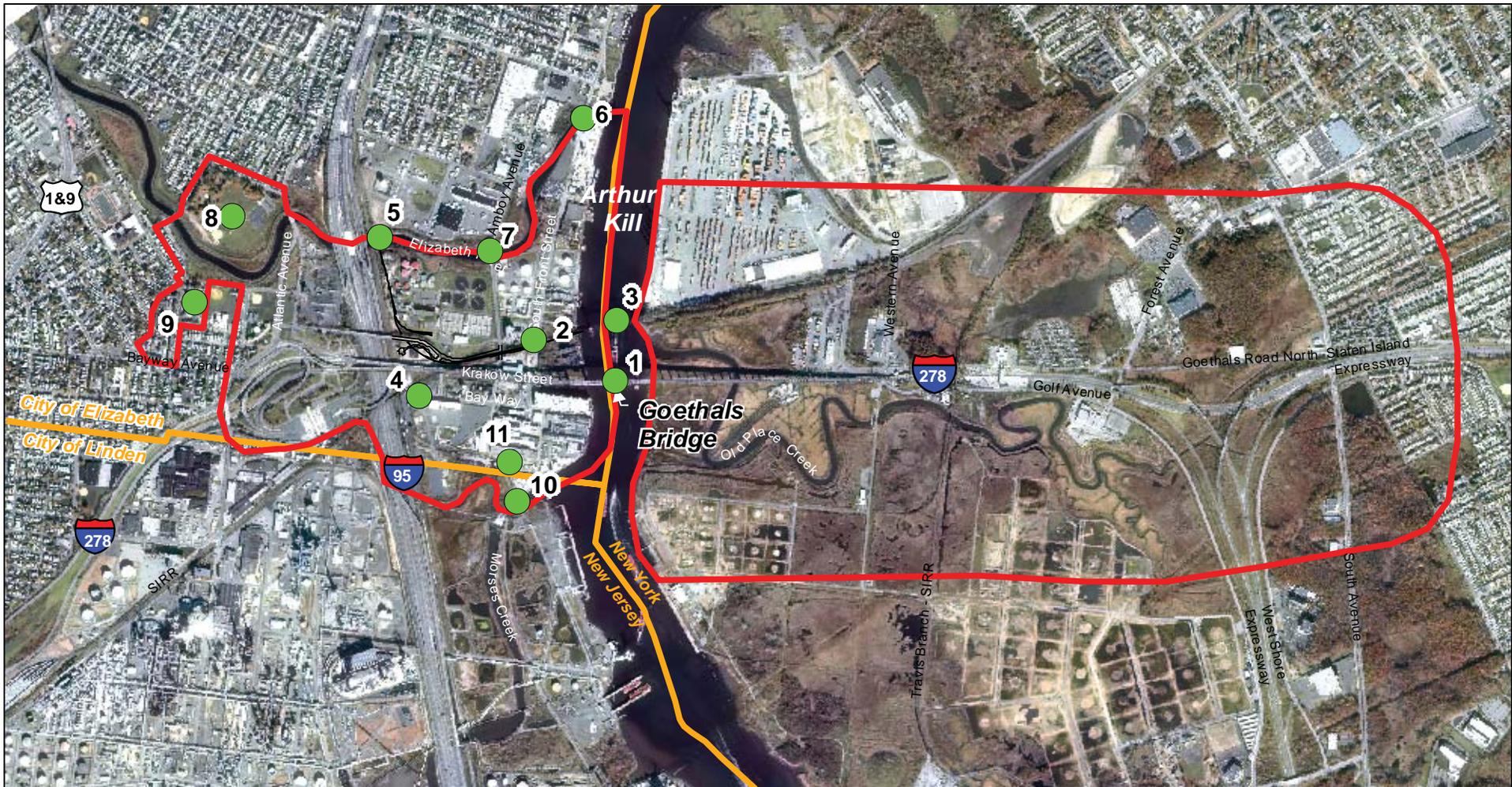
Definition of the APE for Historic Architectural Resources. – The Area of Potential Effect (APE) for historic architectural resources was determined in consultation with the NJHPO and NYSOPRHP.

As originally presented during the NEPA EIS scoping process in the Fall 2004, the proposed definition of the APE had been established based on the same definition as the one previously determined for the 1997 SIBP FEIS, whereby its boundaries were set one-half mile in all directions from the existing Goethals Bridge corridor. Such proposed APE was then submitted to the NJHPO and the NYSOPRHP in June 2005 (as part of the Project Initiation Letter of June 17, 2005) for review and concurrence as part of the Section 106 consultation process. The NJHPO review of the APE subsequently determined that, owing to broader viewshed concerns, the use of a larger APE for historic architecture in New Jersey would be required for the current project. As a result, a joint field review of the Goethals Bridge and its environs was conducted in October 2005 along with NJHPO to develop an appropriate APE that addressed the potential viewshed resulting from the Proposed Project. Following further consultation, a revised APE was ultimately submitted to the NJHPO on March 10, 2006. The revised APE considered the nature and scale of the proposed project, the existing built environment in which the project will occur, and the various ways in which the project could reasonably be demonstrated to affect historic properties.

On the New Jersey side of the Goethals Bridge and in consultation with NJHPO, the APE was thus expanded so that it is bounded by the Arthur Kill on the east, the Elizabeth River and Mattano Park on the north, Clifton and Pulaski Streets on the west, Interchange 13 and associated ramps on the southwest, and Morses Creek on the south. On the New York side of the Goethals Bridge, its originally-proposed definition of one-half mile in all directions from the existing Goethals Bridge corridor was reviewed and approved by NYSOPRHP. Together, the APE for historic architectural resources in both New Jersey and New York is depicted on Figure 4.

Assessment of Historic Architectural Resources. – A total of 11 historic architectural resources (see Figure 4) were identified as eligible for, or listed on the National Register of Historic Places.¹⁰ Any of the four Build Alternatives, currently being advanced in the Draft EIS under the Proposed Project, would have an adverse effect on three of these resources, including: the Goethals Bridge, the Staten Island

¹⁰ See the accompanying CD-ROM reports: *Historic Architectural Resources Study Report–New Jersey* (July 2008); *Historic Architectural Resources Survey Report–New York* (August 2007); and *New York State Historic Resource Inventory Form–Staten Island Railway Lift Truss Bridge* (May 2008).



Legend

- Area of Potential Effect
- Historic Resource

| |
|---|
| Goethals Bridge Replacement EIS |
| <p>Figure 5.7-1</p> <p>Historic Architectural Resources within the APE</p> |
| United States Coast Guard |

Source:
 Basemapping: Port Authority of New York and New Jersey, 2002.
 Data: The Louis Berger Group, 2004.

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Railroad Historic District, and the Staten Island Railway Lift Truss Bridge over the Arthur Kill.¹¹ Principally, proposed demolition of the Goethals Bridge would result in an adverse effect to this structure. Although the Proposed Project would not cause physical damages or alter the character-defining features of either the Staten Island Railroad Historic District or the Staten Island Railway Lift Truss Bridge over the Arthur Kill, their close proximity to the proposed undertaking would create an adverse visual effect due to the removal of the Goethals Bridge and the introduction of a new structure.

Current Consultation Status for Historic Architectural Resources and Future MOA. – As part of the ongoing NEPA process, a series of outreach meetings (including agencies, general public and other stakeholders) were held and the finding of adverse effect as a result of the proposed demolition of the National Register-eligible Goethals Bridge was publicly presented in October 2008. While formal public hearings are to be held sometime in June 2009 following the release of the Draft EIS and start of the Public Comment Period, a meeting with both NJHPO and NYSOPRHP was held on April 20, 2009 in order to have preliminary discussions regarding a future Memorandum of Agreement (MOA) relative to the Proposed Project since any of the four Build Alternatives would result in the same adverse effects.¹² Pending further consultation with both SHPOs and potentially the Advisory Council on Historic Preservation (ACHP), should the ACHP desire to participate in such effort, it is the intent that a copy of the executed MOA and its stipulations, conducted as per Section 106 of the NHPA, will be included in the Final EIS.

At the meeting of April 20, 2009, potentially feasible mitigation measures were discussed to some extent (e.g., including Level I documentation in the Historic American Engineering Record [HAER]; design of a signature bridge; and the production of educational materials documenting the bridge's history and significance to the region it serves), both SHPOs have also provided additional inputs as to the consulting/interested parties, and involvement in the MOA process. To aid in the identification of appropriate mitigation measures and define stipulations for a future MOA, the SHPOs have requested of the USCG the following steps:

- Provide additional information to more clearly define significance of the Goethals Bridge (i.e., Level of Significance and Period of Significance).
- Finalize the formal list of consulting and interested parties, which have already been involved in the Proposed Project¹³ and which might choose to be active participants in the preparation of the MOA and/or become signatories. To that effect and pursuant to this current letter, the USCG looks forward to the Council's determination of whether it wishes to participate in these ongoing consultations pursuant to 36 CFR § 800.6(a)(1).

11 See the accompanying CD-ROM report: *Historic Resources Effects Assessment* (July 2008).

12 An environmentally-preferred alternative for the GBR will be selected at the time of the Final EIS and issuance of its Record of Decision (ROD).

13 It should be noted that many of those consulting and interested parties have already been actively involved in the Proposed Project as part of the *Public Participation Plan* detailed above. Additionally, preliminary lists of interested and consulting parties have already been formally submitted to both SHPOs in previous correspondences, including letters dated of 6/17/05 and 12/13/07 (see the accompanying CD-ROM of *Related Section 106 Correspondence*).

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- Upon the SHPOs review and concurrence for the Goethals Bridge's definition of significance, a summary documentation will be provided to ACHP as well as all other consulting parties. Additionally, it is the intent that the interested parties will be notified of such summary documentation posted on the project website at www.goethalseis.com.
- Additional meetings will then be held to develop the MOA and focus on its stipulated mitigation measures as part of the consultation with the SHPOs and continued inputs from interested and consulting parties.