
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. 04/17/2009 - USCG Transmittal Letter to NJHPO of Request for Clarification of Level of Significance (dated April 2009) for review and information in advance of 4/20/09 Pre-MOA Meeting.
36. 04/17/2009 - USCG Letter to Transmittal NYSOPRHP of Request for Clarification of Level of Significance (dated April 2009) for review and information in advance of 4/20/09 Pre-MOA Meeting.
37. 04/20/2009 - Minutes of pre-MOA Meeting with NJHPO and NYSOPRHP.
38. 05/13/2009 - USCG Letter to ACHP advising of Adverse Effect Determination and Invitation to Participate in Section 106 Process.
39. 06/02/2009 - ACHP Response Letter to USCG declining ACHP participation in the consultation to resolve adverse effects and MOA development for the GBR Project.

40. 08/21/2009 – USCG Transmittal Letter to NJHPO of 1) Expanded Statement of Significance for the Goethals Bridge, 2) Updated List of Consulting and Interested Parties, and 3) ACHP Response Letter of June 2, 2009.
41. 08/21/2009 - USCG Transmittal Letter to NYSOPRHP of 1) Expanded Statement of Significance for the Goethals Bridge, 2) Updated List of Consulting and Interested Parties, and 3) ACHP Response Letter of June 2, 2009
42. 12/18/2009 – NJHPO Concurrence Letter re: 1) Expanded Statement of Significance for the Goethals Bridge, 2) Updated List of Consulting and Interested Parties, and 3) ACHP Response Letter of June 2, 2009.
43. 01/15/2010 – USCG Transmittal Letter to NJHPO re: Proposed Preliminary Stipulations for the MOA (dated January 2009) in advance of 2/04/10 MOA Meeting.
44. 01/15/2010 – USCG Transmittal Letter to NYSOPRHP re: Proposed Preliminary Stipulations for the MOA (dated January 2009) in advance of 2/04/10 MOA Meeting.
45. 02/04/2010 – Minutes of the Goethals Bridge MOA Mitigation Meeting for agreement on the MOA’s Stipulations.
46. 05/28/2010 – Release of Draft MOA to the public and all Consulting and Interested Parties.

* 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

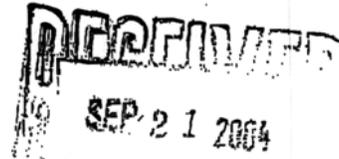
09/02/04

PROJECT NUMBER

DATE RECEIVED

PROJECT

GOETHALS BRDG MODERNIZ'N:



- 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.R09/07/04

PROJECT NUMBER

DATE RECEIVED

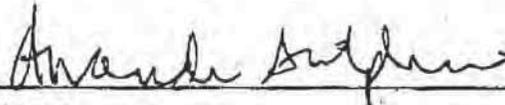
PROJECT

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.



SIGNATURE

09/08/04

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

Amboy Avenue

Westport Avenue

Krakow Street

Bay Way

95

278

New Jersey

0 0.125 0.25 Miles

EXISTING ALIGNMENT SOUTH

Legend

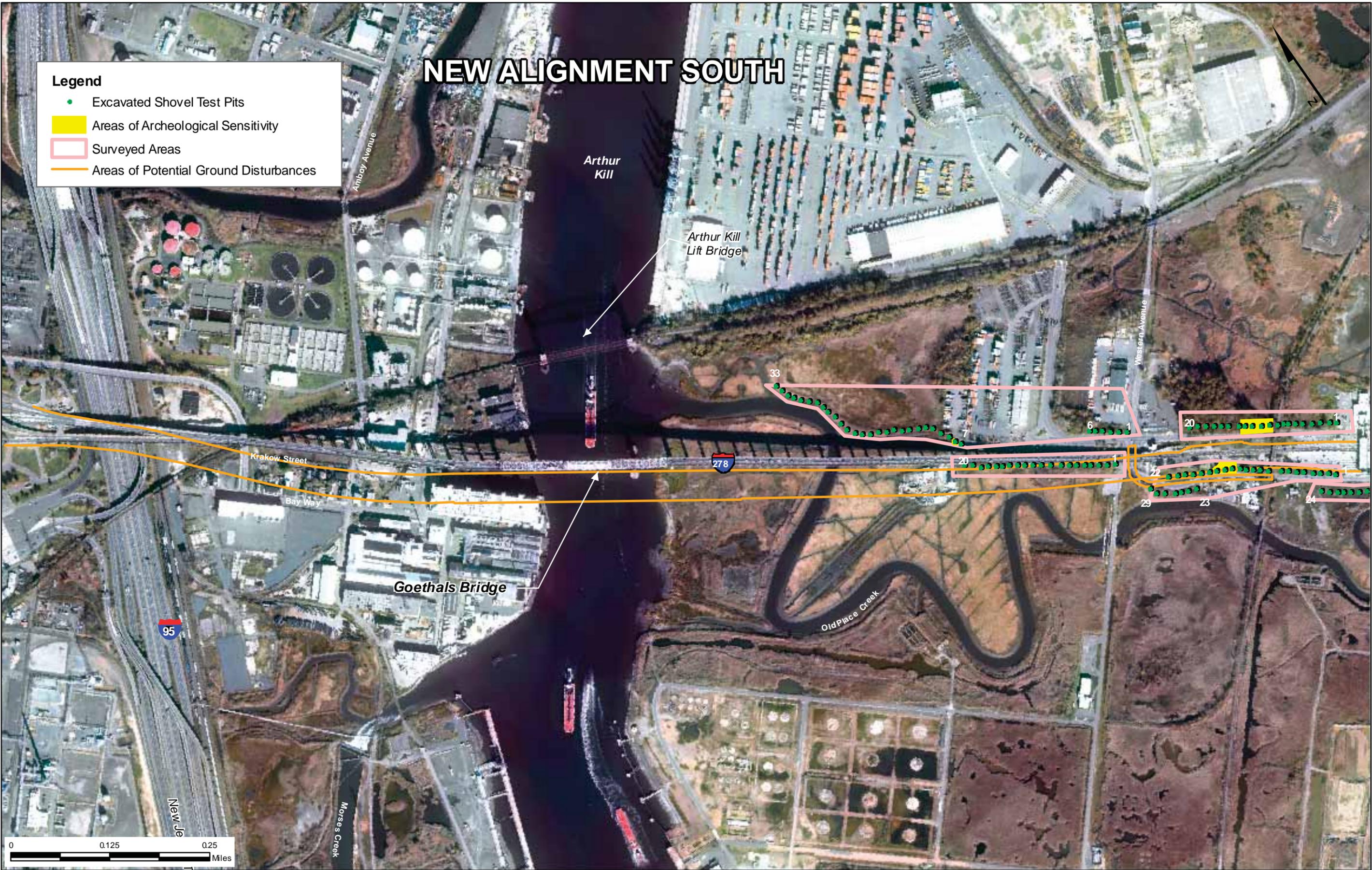
- Excavated Shovel Test Pits
- Areas of Archeological Sensitivity
- Surveyed Areas
- Areas of Potential Ground Disturbances



NEW ALIGNMENT SOUTH

Legend

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





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:

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.

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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

INTERESTED PARTIES CONSULTATION

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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

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PO Box 040320
Staten Island, NY 10304

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



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

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

5734_FSO_ALS_05132008.doc

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

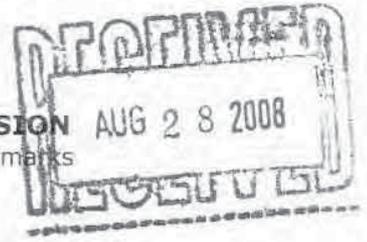
8/13/2008

SIGNATURE

DATE



5734_FSO_GS_08132008.doc



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*

[Handwritten flourish]



HPO-12008-79
05-0030-8, 11, 12
Prod

JON S. CORZINE
Governor

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



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,



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,



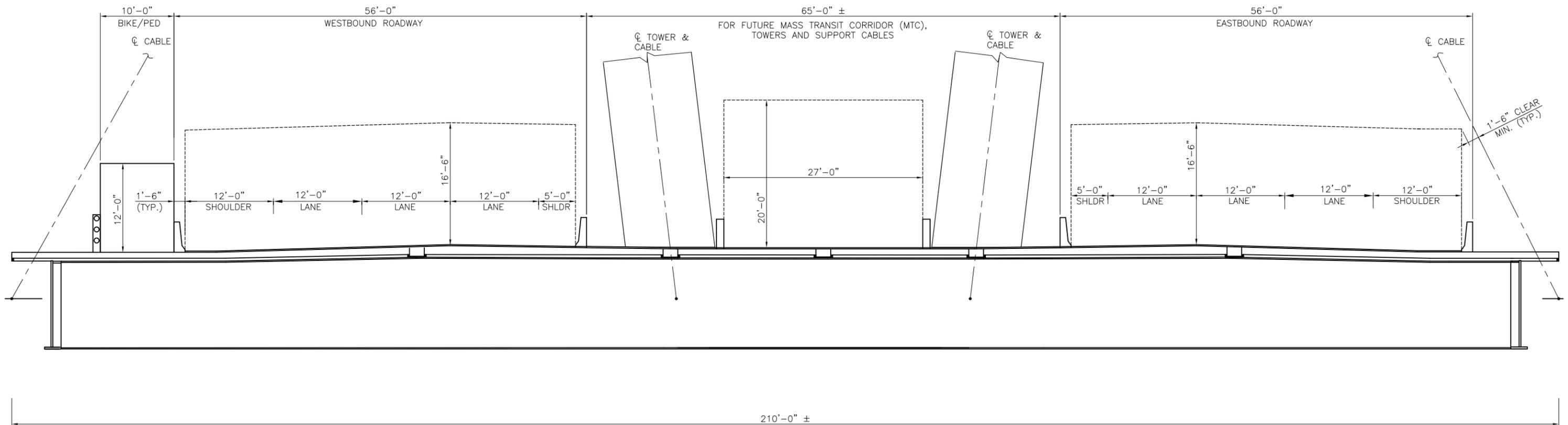
Gary Kassof
Bridge Program Manager
First Coast Guard District
By Direction of the District Commander

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
Phone: 973.407.1260
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www.culturalresourcegroup.com

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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
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: 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.

Deborah Baldwin Van Steen
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12/11/2008

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PO Box 1946
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.

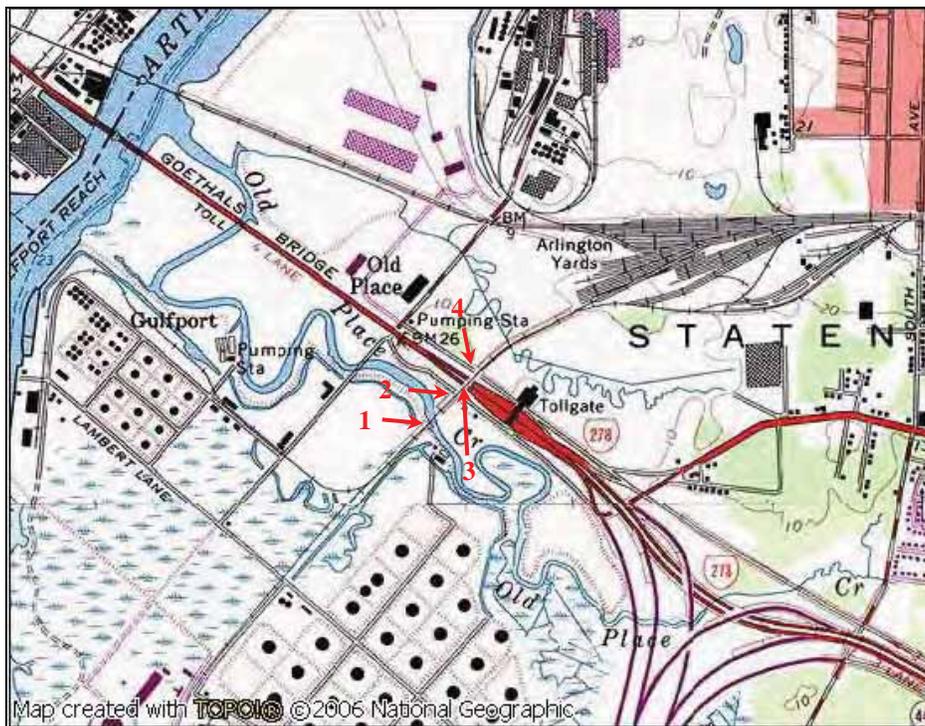


Plate 2. USGS Map, Travis Branch Bridges within the APE

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

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

16591/Goethals Bridge
April 17, 2009

Mr. Dan Saunders
Acting Administrator and 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).
Staten Island, Richmond County.
Section 106 Consultation with NJHPO (HPO-E2008-138):
(1) Request for Clarification of Level of Significance – April 2009**

Dear Mr. Saunders:

Following the project initiation letter of June 17th, 2005 and under the Section 106 Consultation for the GBR EIS, the U.S. Coast Guard (USCG) is transmitting the attached *Request for Clarification of Level of Significance (dated April 2009)* for your review and information. Under the proposed GBR Replacement Project, The Port Authority of New York and New Jersey (PANYNJ) is the project sponsor while the USCG is the federal lead agency for the preparation of the EIS in accordance with the National Environmental Policy Act of 1969.

A meeting is scheduled for Monday April 20th, 2009 to begin the discussion of terms for a Memorandum of Agreement (MOA) among both NJ and NY SHPOs, the USCG and the PANYNJ regarding the proposed demolition and replacement of the Goethals Bridge and associated mitigation measures.

The following NJHPO staffs have been involved with the GBR EIS since the beginning of our on-going consultation effort with your agency:

- Mike Gregg for issues and affairs on Archaeological Resources, and
- Andrea Tingey and Michelle Hughes for issues and affairs on Historic Resources.

As noted previously, the USCG 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 directly with your agency during this consultation. To that effect, please feel to contact directly Deborah Van Steen at 973-407-1260 or Susan Grzybowski at 973-407-1266 with any questions or comments concerning the enclosed report. Otherwise, please call me at 212-668-7021.

Thank you for your assistance in this undertaking. The USCG looks forward to your continued involvement in this 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:

- *Request for Clarification of level of Significance (April 2009)*

Copy:

Ruth L. Pierpont (NYSOPRHP)
James Warren (NYSOPRHP)
Andrea Tingey (NJHPO)
Coleen Hopson (PANYNJ)
Ken Hess (Berger/PB)

Judith Versenyi (Berger/PB)
Kris Beadenkopf (Berger/PB)
Susan Grzybowski (Berger/PB)
Deborah Van Steen (Berger /PB)

TECHNICAL MEMORANDUM

GOETHALS BRIDGE REPLACEMENT EIS

DATE:	April 16, 2009
TO:	Andrea Tingey NJDEP - Historic Preservation Office James Warren NYSOPRHP - Bureau of Historic Preservation
FROM:	Deborah Van Steen Berger/PB
SUBJECT:	Request for Clarification of Level of Significance for the Eligible Goethals Bridge.

In 1995, the New Jersey Historic Preservation Office and the New York State Office of Parks, Recreation and Historic Preservation issued opinions of eligibility for the Goethals Bridge, Elizabeth, Union County, New Jersey, and Staten Island, New York. However, the level of significance, i.e. local, state, or national, has not been established. As part of the ongoing dialogue with both the New Jersey and New York State Historic Preservation Offices, concurrence and clarification of the level of significance of Goethals Bridge is requested.

Background Information

The opinions of eligibility establish that the Goethals Bridge, which opened in 1928, is significant under Criterion C in the area of engineering for the innovative methods used in its construction and Criterion A in the area of transportation as the first bridge for vehicular traffic between Staten Island and New Jersey. Associated with noted engineers, Othmar Hermann Ammann (1879-1965) as construction supervisor, and designer J.A.L. Waddell (1854-1938), the bridge consists of a high 672-foot-long cantilever truss main span and long, elevated approach spans noted for their concrete arch support piers. The total elevated length of the structure extends for more than one mile, connecting New Jersey and Staten Island. Including approach spans, the bridge is in excess of 11,000 feet in length. Goethals Bridge and Outerbridge Crossing span the Arthur Kill and were the first projects by the newly formed Port Authority of New York and New Jersey (established in 1921 as the Port of New York Authority). Intended to alleviate the congested ferry system to Staten Island, the Goethals Bridge formed the first link for vehicular traffic between Staten Island and the mainland at Elizabeth, New Jersey.

Othmar Hermann Ammann and J.A.L. Waddell, the two men most closely associated with the design and engineering of the Goethals Bridge, were both highly noted engineers, each in his own right. Ammann is known for his involvement with many of the large bridges in New York City, such as the Triborough, Henry Hudson, Marine Parkway Gil Hodges Memorial, George Washington, Throgs Neck, Verrazano-Narrows, Bayonne, and the Bronx-Whitestone bridges. He was also a consultant for the Walt Whitman Bridge (Philadelphia), the Delaware Memorial Bridge (New Jersey and Delaware) and the Golden Gate Bridge (California). Likewise, Waddell designed a number of bridges, which include the Outerbridge Crossing (New York and New Jersey), the Bronx-Whitestone Bridge (New York), the Anthony Wayne Bridge (Ohio), the Colorado Street Bridge (California), the Grace Memorial Bridge (South Carolina), the

TECHNICAL MEMORANDUM

GOETHALS BRIDGE REPLACEMENT EIS

Jamestown Bridge (Rhode Island), and the Rainbow International Bridge (New York, and Ontario, Canada).

After World War I, demands to provide truck and automobile access and transportation connections for industrial development along the Arthur Kill increased substantially. The Arthur Kill crossings—Goethals Bridge and Outerbridge Crossing—were selected as the first Port Authority projects, successful completion of which facilitated construction of other crossings between New Jersey and New York, such as the George Washington Bridge, and improvement of the New York-New Jersey port and freight system. Goethals Bridge, which originally carried Route 439, now Interstate 278, supported localized regional vehicular traffic between Staten Island and New Jersey. Tolls collected on the bridge took decades to become self-sustaining. Not until construction of the Verrazano-Narrows Bridge in 1964 and connection across the five boroughs did the traffic increase to sufficient levels¹.

Due to strong opposition from neighboring residential communities, a proposed direct connection to I-78 at the western terminus of the Goethals Bridge was not completed. Instead access to the bridge continued via Routes 1 and 9 near the New Jersey Turnpike and I-78. The eastern terminus of the route is the Bruckner Interchange at the intersection of the Bruckner Expressway, Cross Bronx Expressway, Whitestone Expressway², and Hutchinson River Parkway in the New York City borough of the Bronx. Constructed in the 1960s, the interchange forms the connection linking I-278 to I-95. Thus, direct access to the interstate system, especially in New Jersey, was only partially realized. After extension of I-278 through New York, the Goethals Bridge became one of the crossings that is part of the greater New York metro region beltway.

Recommended Level of Significance

The Goethals Bridge has regional, state-level significance as the first vehicular bridge to connect Staten Island, New York with the mainland at New Jersey. The Port Authority initiated its bridge construction program with the Arthur Kill crossings at Goethals and Outerbridge Crossing. These first projects were conceived to pave the way for future construction, namely a bridge over the Hudson River between New Jersey and Manhattan (the George Washington Bridge). The award-winning Bayonne Bridge, constructed 1928-1931, is the third bridge to Staten Island constructed by the Port Authority. According to the Port Authority it remains one of the most spectacular bridges in the Metropolitan area and one of the longest steel arch bridges in the world³. By comparison, the George Washington Bridge is considered the most monumental suspension bridge constructed at the time and is likened to the Brooklyn Bridge as an important pioneering work by Carl Condit, noted chronicler of American construction history⁴. Additionally, the George Washington Bridge provides a significant link for car and truck transportation connecting the port of New York and New Jersey with the major highways that later became core routes in the Interstate Highway System. The Goethals Bridge remains more closely associated with development of Staten Island and the nearby industry in New Jersey and New York. Ammann and J.A.L. Waddell, both known for their bridge and engineering accomplishments, designed bridges across the country, several of which have received far greater attention and acclaim than is associated with the

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4 Carl Condit. *American Building Art: The Twentieth Century*. New York: Oxford University Press, 1961.

TECHNICAL MEMORANDUM

GOETHALS BRIDGE REPLACEMENT EIS

Goethals Bridge. As an early project of the Port Authority that facilitated vehicular traffic between New Jersey and Staten Island and as one of a number of bridges constructed in the Metropolitan area, Goethals Bridge is recommended significant at the State level in recognition of its impact on regional development in Staten Island, New York, and Union County, 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

16591/Goethals Bridge
April 17, 2009

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.
Section 106 Consultation with NYSHPO (04PR3162):
(1) Request for Clarification of Level of Significance – April 2009**

Dear Ms. Pierpont:

Following the project initiation letter of June 17th, 2005 and under the Section 106 Consultation for the GBR EIS, the U.S. Coast Guard (USCG) is transmitting the attached *Request for Clarification of Level of Significance (dated April 2009)* for your review and information. Under the proposed GBR Replacement Project, The Port Authority of New York and New Jersey (PANYNJ) is the project sponsor while the USCG is the federal lead agency for the preparation of the EIS in accordance with the National Environmental Policy Act of 1969.

A meeting is scheduled for Monday April 20th, 2009 to begin the discussion of terms for a Memorandum of Agreement (MOA) among both NJ and NY SHPOs, the USCG and the PANYNJ regarding the proposed demolition and replacement of the Goethals Bridge and associated mitigation measures.

The following NYSOPRHP staffs have been involved with the GBR EIS since the beginning of our on-going consultation effort with your agency:

- Doug Mackey and Beth Cumming for issues and affairs on Archaeological Resources, and
- James Warren for issues and affairs on Historic Resources.

As noted previously, the USCG 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 directly with your agency during this consultation. To that effect, please feel to contact directly Deborah Van Steen at 973-407-1260 or Susan Grzybowski at 973-407-1266 with any questions or comments concerning the enclosed report. Otherwise, please call me at 212-668-7021.

Subj: GOETHALS

16591

Thank you for your assistance in this undertaking. The U.S. 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:

- *Request for Clarification of Level of Significance (April 2009)*

Copy:

Dan Saunders (NJHPO)
Andrea Tingey (NJHPO)
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Ken Hess (Berger/PB)

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Susan Grzybowski (Berger/PB)
Kris Beadenkopf (Berger/PB)
Deborah Van Steen (Berger/PB)

TECHNICAL MEMORANDUM

GOETHALS BRIDGE REPLACEMENT EIS

DATE:	April 16, 2009
TO:	Andrea Tingey NJDEP - Historic Preservation Office James Warren NYSOPRHP - Bureau of Historic Preservation
FROM:	Deborah Van Steen Berger/PB
SUBJECT:	Request for Clarification of Level of Significance for the Eligible Goethals Bridge.

In 1995, the New Jersey Historic Preservation Office and the New York State Office of Parks, Recreation and Historic Preservation issued opinions of eligibility for the Goethals Bridge, Elizabeth, Union County, New Jersey, and Staten Island, New York. However, the level of significance, i.e. local, state, or national, has not been established. As part of the ongoing dialogue with both the New Jersey and New York State Historic Preservation Offices, concurrence and clarification of the level of significance of Goethals Bridge is requested.

Background Information

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TECHNICAL MEMORANDUM

GOETHALS BRIDGE REPLACEMENT EIS

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Due to strong opposition from neighboring residential communities, a proposed direct connection to I-78 at the western terminus of the Goethals Bridge was not completed. Instead access to the bridge continued via Routes 1 and 9 near the New Jersey Turnpike and I-78. The eastern terminus of the route is the Bruckner Interchange at the intersection of the Bruckner Expressway, Cross Bronx Expressway, Whitestone Expressway², and Hutchinson River Parkway in the New York City borough of the Bronx. Constructed in the 1960s, the interchange forms the connection linking I-278 to I-95. Thus, direct access to the interstate system, especially in New Jersey, was only partially realized. After extension of I-278 through New York, the Goethals Bridge became one of the crossings that is part of the greater New York metro region beltway.

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4 Carl Condit. *American Building Art: The Twentieth Century*. New York: Oxford University Press, 1961.

TECHNICAL MEMORANDUM

GOETHALS BRIDGE REPLACEMENT EIS

Goethals Bridge. As an early project of the Port Authority that facilitated vehicular traffic between New Jersey and Staten Island and as one of a number of bridges constructed in the Metropolitan area, Goethals Bridge is recommended significant at the State level in recognition of its impact on regional development in Staten Island, New York, and Union County, New Jersey.



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.

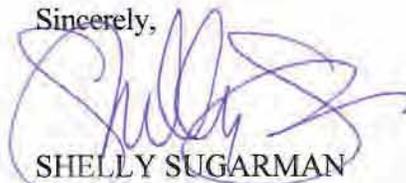
Preliminary discussions with both NJHPO and NYSOPRHP to clarify the level and period of significance of the bridge as well as potential mitigation have commenced, including a recent meeting on April 20, 2009. Based on the USCG's coordination with these agencies, the following milestones have been reached:

- 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

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(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.

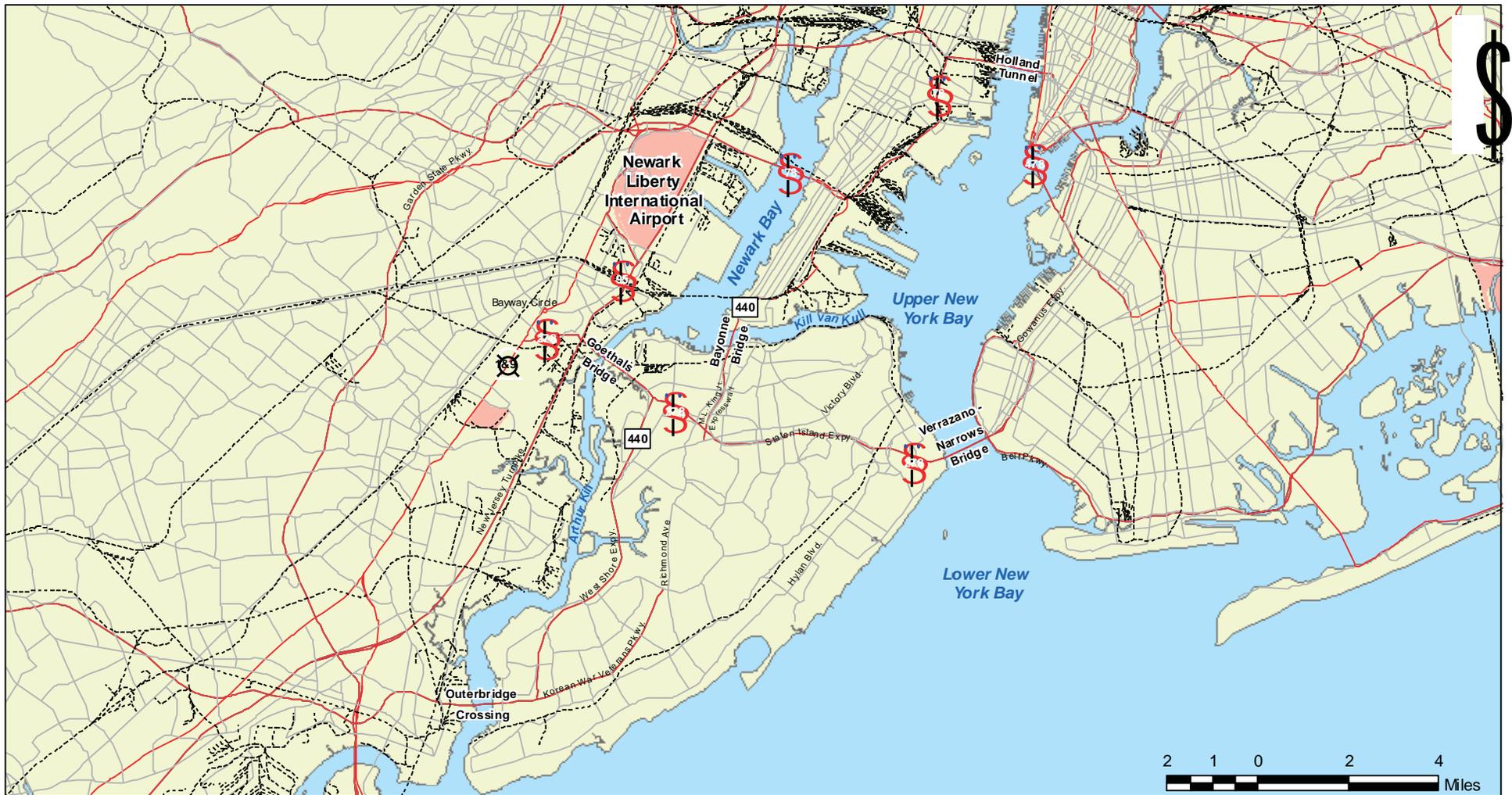
By the mid-1980s, the bridge had become functionally and physically obsolete as original design features no longer met current standards and added to deteriorated traffic conditions and relatively higher accident levels. In the early 1990s, the Port Authority undertook an alternatives analysis of potential 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

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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:

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- 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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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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GOETHALS BRIDGE EIS

- 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 supplement 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.

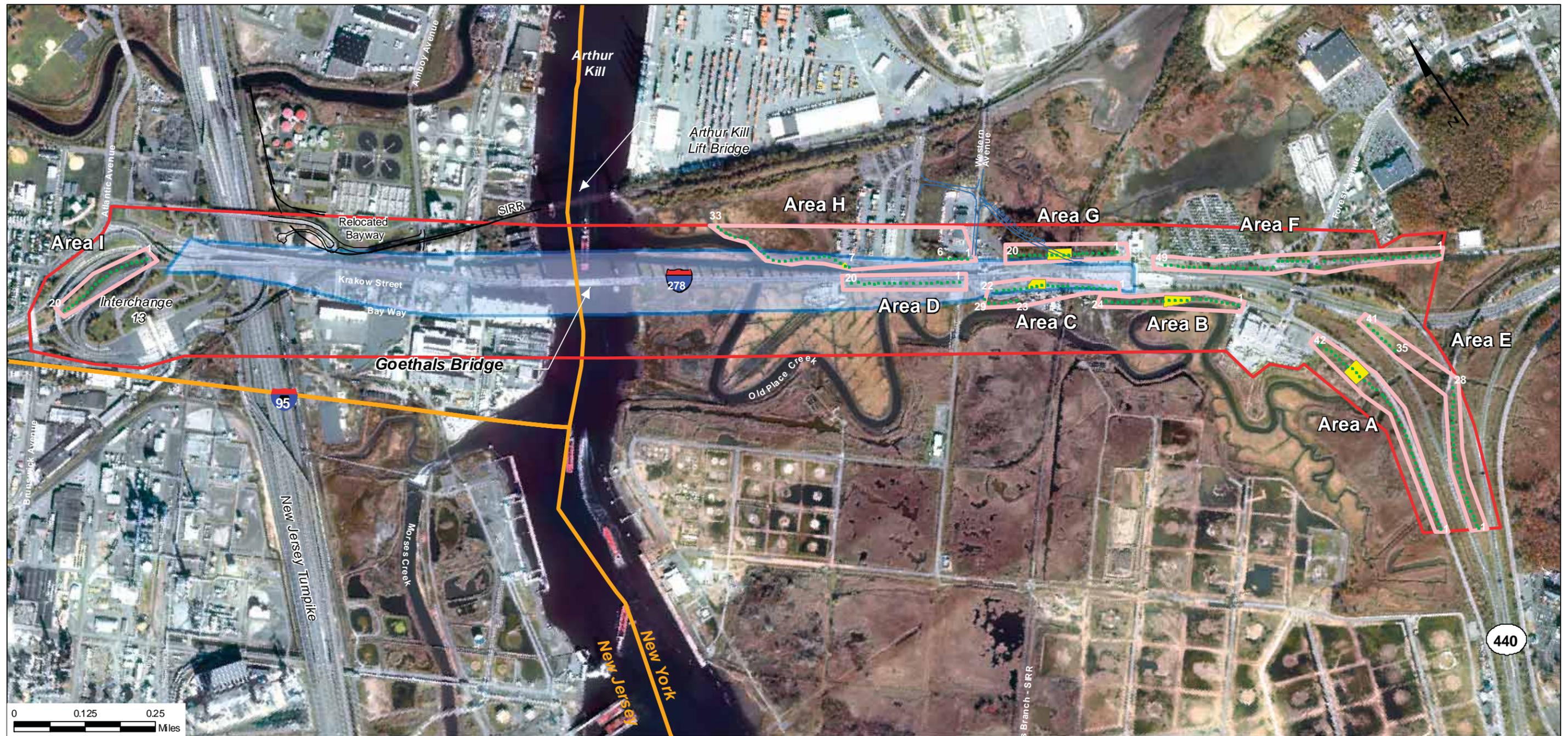
Assessment of Archaeological Resources. – Within the New Jersey archaeological APE, the results of the background research and field reconnaissance stages of the Phase I archaeological survey indicated that there are no archaeological sites documented within the archaeological APE and that much of the 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.

MEMORANDUM

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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

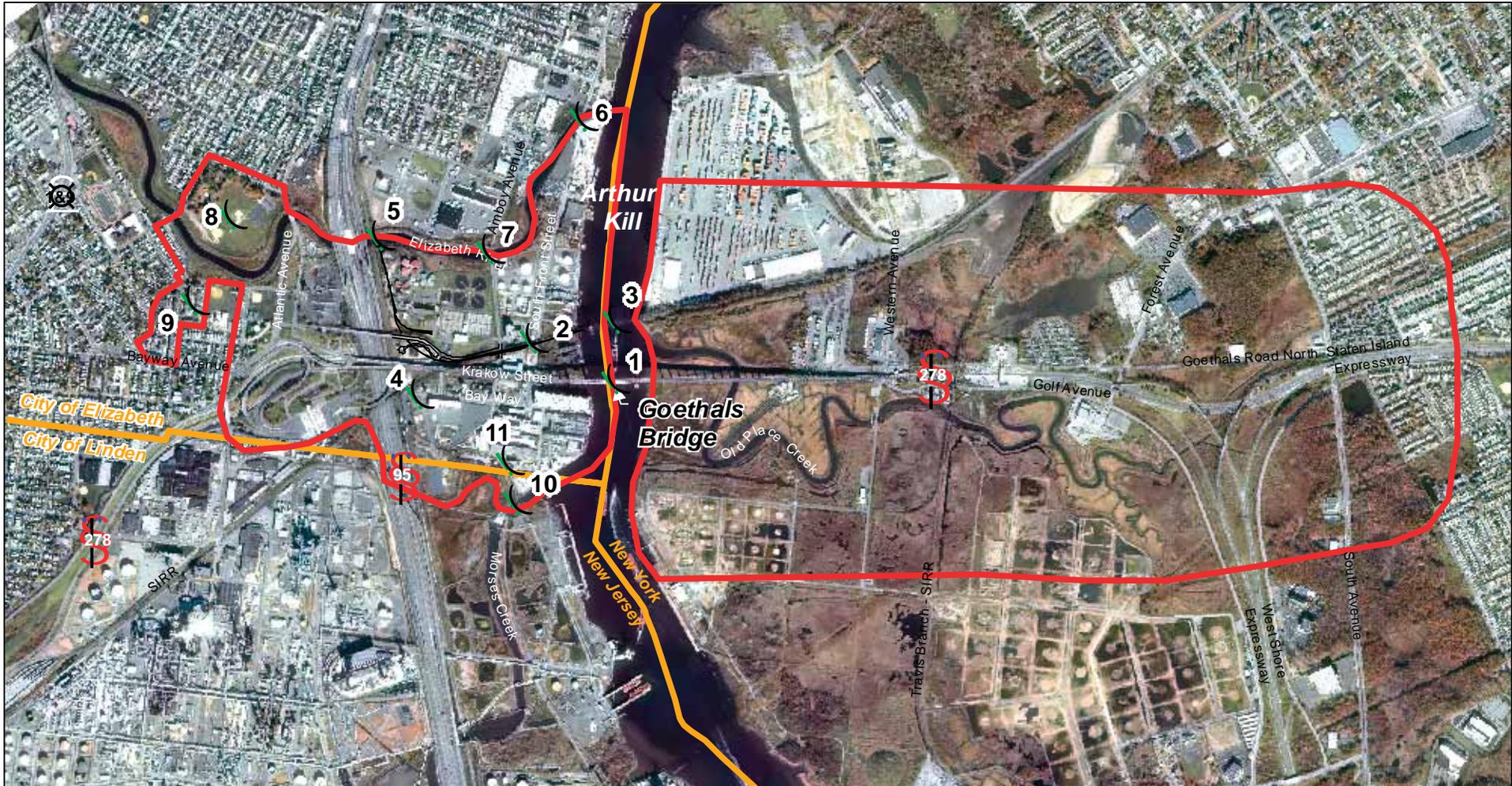
Definition of the APE for Historic Architectural Resources. – The Area of Potential Effect (APE) for historic architectural resources was determined in consultation with the NJHPO and NYSOPRHP.

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
- (Historical Resource

Goethals Bridge Replacement EIS

Figure 5.7-1

Historic Architectural Resources
within the APE

United States Coast Guard

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

MEMORANDUM

GOETHALS BRIDGE EIS

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 and 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*).

MEMORANDUM

GOETHALS BRIDGE EIS

- 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.



Preserving America's Heritage

June 2, 2009

Ms. Shelly Sugarman
Chief, Permits Branch
USCG Bridge Program
2100 Second Street SW
Washington, DC 20593-0001

RE: *U.S. Department of Homeland Security, U.S. Coast Guard
Approval of Goethals Bridge Project
Elizabeth, New Jersey and Staten Island, New York*

Dear Ms. Sugarman:

On May 14, 2008, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and you determine that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR Part 800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the New Jersey and New York SHPOs and any other consulting parties, and related documentation at the conclusion of the consultation process to complete the requirements of Section 106 of the National Historic Preservation Act. Please provide information on how the views of the public and other consulting parties, including Indian tribes, were taken into account when DHS files the final MOA with the ACHP.

Thank you for providing the ACHP with your notification of adverse effect. If you have any questions, please contact Blythe Semmer at 202-606-8552 or via e-mail at bsemmer@achp.gov.

Sincerely,

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

LaShavio Johnson
Historic Preservation Technician
Federal Permitting, Licensing and Assistance Section
Office of Federal Agency Programs

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

16591/Goethals Bridge
August 21, 2009

Mr. Dan Saunders
Acting Administrator and 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 (GBR)
Section 106 Consultation with NJHPO:**

- (1) **Expanded Statement of Significance for the Goethals Bridge**
- (2) **Updated List of Consulting and Interested Parties**
- (3) **ACHP Response Letter of June 2, 2009.**

Dear Mr. Saunders:

Following the Project Initiation Letter (PIL) of June 17th, 2005 and under the Section 106 Consultation for the GBR EIS, the U.S. Coast Guard (USCG) is transmitting the enclosed documents for your review and information. For the Goethals Bridge Replacement (or Proposed Project), The Port Authority of New York and New Jersey (PANYNJ) is the project sponsor while the USCG is the federal lead agency for the preparation of the EIS in accordance with the National Environmental Policy Act (NEPA) of 1969.

Subsequent to USCG's determination of Adverse Effect on three historic architectural resources and NJHPO and NYSOPRHP's concurrence, a Memorandum of Agreement (MOA) will need to be prepared for the Proposed Project, pursuant to Section 106 Consultation (36 CFR 800.6). To that end, a pre-MOA Meeting was held with NJHPO and NYSOPRHP on April 20th, 2009, during which the following requests were made:

1. NJHPO requested that the previous statements of significance be supplemented to examine and recommend the level of significance, indicate a period of significance, and address significance Criterion C as the work of a master, as appropriate. The *Expanded Statement of Significance for the Goethals Bridge*, which builds on the previous significance statements of eligibility of the Goethals Bridge in the areas of Transportation/Development (Criterion A) and Engineering (Criterion C) (NJHPO 1995; OPRHP 1994), is herein attached for your review.
2. NJHPO and NYSOPRHP requested that the current list of Consulting and Interested Parties (originally submitted as part of the PIL) be updated in light of a future MOA preparation and execution. The *Updated List of Consulting and Interested Parties* is herein attached for your review. It should be noted that all parties identified in such list have already been actively participating in or made aware of the Proposed Project

through the USCG's NEPA environmental review, public outreach program, and its recently published GBR DEIS.

3. Following NJHPO and NYSOPRHP's request, the USCG notified the Advisory Council on Historic Preservation (ACHP) in May 2009 of the determination of Adverse Effect, and formally invited ACHP to participate in the development of the MOA (that letter dated 5/13/09 was copied to your agency). By letter dated 6/2/09, copy enclosed, the ACHP advised that they will not participate in the MOA development, but reserve the right to reconsider at a later date should consulting or interested parties request so.

The following NJHPO staffs have been involved with the GBR EIS since the beginning of our on-going consultation effort with your agency:

- Mike Gregg for issues and affairs on Archaeological Resources, and
- Andrea Tingey and Michelle Hughes for issues and affairs on Historic Resources.

As noted previously, the USCG 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 directly with your agency during this consultation. To that effect, please feel free to contact Deborah Van Steen at 973-407-1260 or Susan Grzybowski at 973-407-1266 with any questions or comments concerning the enclosed report. Otherwise, please call me at 212-668-7021.

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

Sincerely,



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

Enclosures:

- *Expanded Statement of Significance for the Goethals Bridge.*
- *Updated List of Consulting and Interested Parties.*
- *ACHP Response Letter of June 2, 2009.*

Copy:

Ruth L. Pierpont (NYSOPRHP)
James Warren (NYSOPRHP)
Andrea Tingey (NJHPO)
Coleen Hopson (PANYNJ)
Ken Hess (Berger/PB)

Judith Versenyi (Berger/PB)
Kris Beadenkopf (Berger/PB)
Susan Grzybowski (Berger/PB)
Deborah Van Steen (Berger /PB)

Enclosure 1:
Expanded Statement of
Significance for the Goethals Bridge

**GOETHALS BRIDGE
ELIZABETH, NEW JERSEY
STATEN ISLAND, NEW YORK**

EXPANDED STATEMENT OF SIGNIFICANCE

August 2009

Introduction

The Goethals Bridge, as well as its sister bridge, Outerbridge Crossing, have opinions/determinations of eligibility for inclusion in the National Register of Historic Places by both the New Jersey State Historic Preservation Office and the New York State Office of Parks, Recreation and Historic Preservation, which are the two State Historic Preservation Offices (SHPO) with consultation jurisdiction for both bridges. The bridges were photographed in 1991 for the Historic American Engineering Record by Jet Lowe. In 2008, the New York City Landmarks Preservation Commission determined that the Goethals Bridge does not appear to be eligible for designation as a New York City Landmark. At present, the Port Authority of New York and New Jersey, as the project sponsor, have proposed replacement of the Goethals Bridge in order to improve this crossing of the Arthur Kill between New Jersey and Staten Island. The U.S. Coast Guard (USCG), as the lead federal agency, is responsible for conducting the required environmental process pursuant to National Environmental Policy Act (NEPA) of 1969, as amended, and Section 106 of the National Historic Preservation Act (NHPA) of 1966.

In compliance with the NEPA review process and the NHPA Section 106 consultation process, the SHPO(s) are consulted when a federal undertaking impacts a historic property. As part of this consultation, the New Jersey Historic Preservation Office has requested that the previous statements of significance be supplemented to examine and recommend the level of significance, indicate a period of significance, and address significance Criterion C as the work of a master, as appropriate. This expanded statement of significance builds on the previous significance statements of eligibility of the Goethals Bridge in the areas of Transportation/Development (Criterion A) and Engineering (Criterion C) (NJHPO 1995; OPRHP 1994). To accomplish this, a more complete context, history, and narrative have been crafted by Louis Berger Group's architectural historians Deborah Van Steen and Michael Yengling.

Significance

Goethals Bridge was completed in 1928 and is a cantilever steel truss bridge that spans the Arthur Kill between New York and New Jersey. With a truss span of 1,152 feet and a total elevated length of 7,109 feet, it represents the early growth of the Port Authority of New York and New Jersey (then known as the Port of New York Authority). It connects the Howland Hook section of Staten Island, New York with Elizabeth, New Jersey and,

together with its larger “twin” bridge, Outerbridge Crossing (which connects Staten Island to Perth Amboy, New Jersey), was the first vehicular crossing constructed by the Port Authority. Early in its construction, the bridge was referred to in a 1926 article as the “Elizabeth-Howland Hook Bridge” (Ammann 1926: 346). In an article the following year, it was referred to simply as the “Elizabeth bridge” (ENR 1927: 744). It was originally supposed to be called the Arthur Kill Bridge but was renamed before its dedication to honor Major General George Washington Goethals. Goethals was the first consulting engineer to the Port Authority and chief engineer of the Panama Canal. He assisted during the design and construction of the bridge but passed away before its completion.

Goethals Bridge was designed by the New York City-based engineering practice of Waddell and Hardesty (now Hardesty & Hanover). The firm was founded by civil engineer John Alexander Low Waddell, designer of many bridges worldwide and author of a number of bridge engineering texts (Plattner 1994). Although Waddell is generally cited as the designer of Goethals Bridge, this responsibility is sometimes attributed to his lesser-known partner Shortridge Hardesty. Construction of the bridge was supervised by Port Authority engineer Othmar H. Ammann, who would later design the Bayonne, George Washington, and Verrazano-Narrows bridges. The 1931 Bayonne Bridge, which connects Staten Island to Bayonne, New Jersey, was the longest steel arch bridge in the world until 1978. It now ranks third (Port Authority 2004a: 2).

Goethals Bridge possesses bi-state, New York - New Jersey regional significance for its role in the rapid development of the bi-state, New York - New Jersey regional transportation infrastructure of New York City’s metropolitan area in the 1920s and 1930s. It embodies the necessary cooperation between the states of New York and New Jersey as well as other entities (including the War Department and the State of New York Bureau of Fine Arts) involved with an interstate bridge crossing of a major shipping channel. It also heralded the highway as the dominant form of transportation between the New Jersey mainland and New York, replacing three of the four ferries that had carried people and automobiles across the Arthur Kill.

Background

Crossing the Arthur Kill

Long before any bridges had been constructed across the Arthur Kill, ferry boats were the dominant mode of transportation between what would become the boroughs of New York City and the neighboring state of New Jersey. The first regular ferry crossing of the Hudson River was in 1661, between Communipaw and New Amsterdam. The earliest ferries were rowboats which used oars, followed by horse-propelled boats, which were then superseded by steam-propelled ferries beginning in 1811. Ferries served Staten Island prior to the Revolutionary War, with routes becoming established from Elizabeth and Perth Amboy, New Jersey, across the Arthur Kill; from Bergen, New Jersey, across the Kill Van Kull; and from Long Island across the Narrows. In 1817, a steam ferry that

served part of a New York to Philadelphia highway route passed through the Arthur Kill between Manhattan and Tompkinsville. This line was moved to the St. George terminal at the north end of Staten Island in 1905. There was also, until 1929, a ferry across the Arthur Kill from Carteret, New Jersey (Port Authority 1925: 15). Following the end of World War I, it was estimated that ferries transported 12 million vehicles annually between New Jersey and Manhattan, a number that reflected increasing congestion due to automobile and truck traffic (Mead & Hunt 1999: 61).

Although the construction of highway bridges is frequently cited as coinciding with the elimination of ferry service to Staten Island, three ferries continued to connect Staten Island with the New Jersey mainland until the early 1960s: two across Arthur Kill and one across Kill Van Kull. Ironically, the ferry that stopped in 1929 (following the construction of the Goethals and Outerbridge Crossing bridges) was the farthest away, serving the northernmost route between Carteret and Staten Island (Cudahy 1990: 285). It would be over three decades before the remaining three ferries shut down: the Elizabeth route in 1961, the Bergen route in 1962, and the Perth Amboy route in 1963 (Cudahy 1990: 289).

Prior to the construction of Goethals Bridge and Outerbridge Crossing in 1928, the only bridge across the Arthur Kill was a ca. 1889 single-track swing bridge serving the Baltimore and Ohio Railroad (Plattner 2004). The construction of a highway bridge between New Jersey and Staten Island had been discussed as far back as 1868; early proposals languished, however, due to the logistical and legislative complexities of building an interstate bridge in a burgeoning metropolitan area. The project was revived in 1921 by Union County, New Jersey's Board of Chosen Freeholders, who advocated for either a bridge or tunnel across the Arthur Kill connecting Elizabeth to New York's Richmond Borough (Port Authority 1925: 18). The New Jersey Legislature awarded \$10,000 towards preliminary surveys, drawings, and construction estimates, an amount that was matched by the Board of Estimate and Apportionment of New York City. The realization that New Jersey law required Federal sanction in order to execute a legal agreement between adjoining communities in different states made high-level cooperation amongst the various parties indispensable to the proposed endeavor (Port Authority 1925: 19).

The preliminary studies, which were conducted by the Tunnel Division of the office of the Chief Engineer of New York's Board of Estimate and Apportionment, first suggested a low-level bridge on the basis of cost. It was suggested that the Baltimore and Ohio Railroad endeavor to construct a bascule bridge more conducive to water traffic (the swing bridge had only 31 feet of vertical clearance above the water) with an adjoining 50-foot wide highway bridge, the additional cost of which would be charged equally to the states of New York and New Jersey. This approach would do away with the need for federal sanction and a complicated agreement between the two states (Port Authority 1925: 20).

No immediate moves were made towards construction of the proposed combination railroad / highway bridge and in 1923, prompted by severe congestion on the ferries

servicing the Arthur Kill, a new study was conducted by the New York and New Jersey Bridge and Tunnel Commissions. The Commissions' reports highlighted the importance of a fixed crossing with regards to fostering the economic development of the area and remedying worsening traffic congestion. A bridge was cited as being preferable to a tunnel, and a cantilever bridge in particular was recommended (Port Authority 1925: 21).

In early 1924, bills were passed by the Legislatures of both New York and New Jersey authorizing the young Port of New York Authority (an agency of both states) to construct two toll bridges: one between Elizabeth, New Jersey and Howland Hook, New York; and one between Perth Amboy, New Jersey and Tottenville, New York. The bills became law in April 1924, providing the go-ahead for the Port Authority's first large-scale undertaking (Port Authority 1925: 22).

The Port Authority

Created as the Port of New York Authority in April 1921, the Port Authority, as it is commonly called, was born out of the conflict between the states of New York and New Jersey over their common waterways, including the Hudson River and the New York Harbor. Spurred by a debate over artificially high freight railroad rates which put New Jersey's ports at a disadvantage relative to Manhattan Island, the need for a means of mutually managing transportation and shipping activities in the Port of New York became apparent (Funding Universe 2009).

Julius Henry Cohen, counsel of the New York State Chamber of Commerce, encouraged the creation of a bi-state commission of New York and New Jersey politicians in 1917. In 1919, he unveiled a proposal for a "Port of New York Authority," modeled to a large extent on the well-known Port of London Authority (Funding Universe 2009). Referred to decades later as "a regional planner's dream," Cohen's proposal was approved (in a somewhat diluted form) by the two states in April 1921, and the organization released its first comprehensive plan in December 1921 (Doig 2001: 49). The comprehensive plan sought to improve the area's transportation problems and promote economic growth through a more orderly network of railroad tracks, tunnels, and marine terminals.

Although proposals for more ambitious projects had been put forward, the Authority's first projects were the Goethals and Outerbridge Crossing bridges across the Arthur Kill. Although there was some opposition to the projects on the basis that the bridges would hinder shipping traffic in the waterway, they were approved in the spring of 1925 by the War Department, which deemed the 135-foot clearance more than sufficient. The Port Authority financed the construction of the bridges through the sale of \$14 million in bonds.

Roughly three years later, Goethals Bridge opened to traffic on June 29, 1928, the same day as Outerbridge Crossing. When asked a number of years later why these two bridges were chosen as the Authority's first projects, Julius Cohen noted that "We wanted to begin with something where we were most likely to succeed, and the smaller enterprise was the better one for the purpose. If we succeeded, the George Washington Bridge

would come later. And so it did” (Richmond 2005: 101). As the first major undertaking of the Port Authority, Goethals Bridge demonstrated the agency’s ability to successfully coordinate large-scale projects and paved the way for even bigger endeavors such as the George Washington Bridge in 1931, Bayonne Bridge in 1931, and the World Trade Center in 1970. The Authority also expanded its involvement from bridges, tunnels, bus terminals, and buildings to include commercial and general aviation and port facilities: it took over the management of Newark Airport (which opened in 1928) in 1945, and in 1947 took over LaGuardia Airport and John F. Kennedy Airport (then New York International).¹

The agency was renamed the Port Authority of New York and New Jersey in 1972 and is described as “a self-supporting public corporation that develops and operates trade and transportation facilities in an area of New York and New Jersey that falls within a 25-mile radius of the Statue of Liberty.” (Funding Universe 2009: 1).

Design and Construction

Original Design and Construction

More than a mile long, Goethals Bridge is a major bridge in the New York City area and was one of the two first automobile bridges to span the Arthur Kill between New Jersey and Staten Island. It operates as a two-way, four-lane toll bridge with a truss span of 1,152 feet and a total elevated length of 7,109 feet. The suspended main span is 672 feet long and uses a cantilever steel through truss. The side spans are each 240 feet long. By today’s standards, the traffic lanes are extremely narrow at only 10 feet each – one of the concerns that has led to proposed replacement and/or expansion plans for the 81 year-old bridge in recent years.

According to the records of the New Jersey State Historic Preservation office, “Although not renowned for its architectural details, the Goethals Bridge was notable from an engineering standpoint at the time of its construction” (Plattner 2004). In order to maintain an open shipping channel in the waterway the bridge was designed to have a mean high water clearance of 135 feet, a height that required extremely long approach spans. The graded viaduct on both sides amounted to approximately 6,000 feet, requiring 75 concrete piers. Together with its approaches, the bridge is in excess of 11,800 feet in length (Plattner 2004).

The high-level cantilever spans are supported by arched reinforced concrete piers. The viaduct approaches, which follow a 4% grade from main bridge to plazas at either end, consist of steel girders on top of arched concrete piers. Due to the long length of the approaches and the varied soil and subsurface conditions both on land and in the channel, a variety of pier foundations were used: wood-pile foundations; wood-sheeted or steel-

¹ Initially named Idlewild Municipal Airport, the Airport’s official names changed to New York Municipal, followed by New York International Airport and later JFK, but Idlewild, the name of the old golf course, continued to be the commonly-used name. See Gordon, 2004.

pile open cofferdams; and pneumatic caissons. The mid-stream piers were sunk fifty feet below the bottom of the channel (Eastern Roads 2007: 2). Construction of the bridge's substructure on the New York side was performed by the Frederick Snare Corp., with engineer Randall Cremer and superintendent D.H. Cameron. The substructure on the New Jersey side was constructed by the Triest Contracting Corp., with superintendent C.M. Rauterkus. Paving of the bridge was done by Albert A Volk, Inc. of New York, and the plazas at either end of the bridge were paved by the Elizabeth Paving Company of New Jersey.²

Additions and Alterations

Although it was originally designed with a walkway for pedestrian and bicycle traffic, Goethals Bridge was altered to accommodate strictly automobile traffic (Eastern Roads 2007: 2). Changes to the bridge since its construction include the installation of a concrete median and parapets; "fender cells" in the Arthur Kill to protect the north and south sides of the main Staten Island pier from errant vessels; and construction of a toll plaza and administration and maintenance buildings on Staten Island in 1964. The construction of new roadways and ramps associated with the New Jersey Turnpike on the New Jersey side necessitated the removal and/or replacement of some of the original arched concrete piers.

J.A.L. Waddell

John Alexander Low Waddell was born in 1854 and obtained his degree from Rensselaer Polytechnic Institute in Troy, New York in 1871. Prior to his career as a designer of bridges, he worked for Canada's Marine Department of the Dominion and the Canadian Pacific Railway. He moved back to the United States and designed coal mines in West Virginia before teaching mechanics at Rensselaer from 1878 to 1880. After obtaining another degree from McGill University in Montreal, Canada, Waddell traveled to Japan and taught at the Imperial University of Tokyo from 1882 to 1886. In 1887, he founded his own engineering firm in Kansas City, Missouri. His work in that region of the country included: the 1898 Waddell "A" Truss Bridge (now demolished) in Clinton County, Missouri; the 1911 Armour-Swift-Burlington Bridge in Kansas City; and the 1917 Detroit-Superior Bridge in Cleveland, Ohio.

In 1920 Waddell took his practice to New York and consulted on a number of bridge designs, including: the 1926 Central Railroad of New Jersey (CRRNJ) Newark Bay lift bridge (demolished in 1980); the 1928 Goethals Bridge and Outerbridge Crossing; the 1929 Grace Memorial Bridge in Charleston, South Carolina (now demolished); and the

² The reference to the plaza at each end of the bridge appears to refer to special treatment at the start of the approach spans and was the paved area that provided access to the bridge. It is not a toll plaza (the contemporary idea of a roadway-related plaza). The toll booths on the NY side were located in the original NY plaza area. The plaza on the NJ side was most likely removed for construction of the New Jersey Turnpike interchange.

1931 Anthony Wayne Bridge, a suspension bridge in Toledo, Ohio (Structurae 2009). At 1.9 miles in length, Grace Memorial Bridge was a major river crossing and the largest steel truss bridge in South Carolina. When it was constructed, it was the fifth longest cantilever span in the world (HAER 1968). Though Waddell has been cited as having been involved in the design of more than 1,000 bridges worldwide, many of them have been demolished and/or replaced and those that continue to survive are a dwindling resource.

Othmar H. Ammann

Othmar Herman Ammann was born in Zurich, Switzerland in 1879 and studied at the Federal Technological Institute in Zurich from 1898 to 1902. He immigrated to the United States in 1904 and worked for Joseph Meyer of New York, after which he became an assistant to the chief engineer of the Pennsylvania Steel Company. In that capacity, he assisted with the design of New York's Queensboro Bridge, a double cantilever span completed in 1909. Also known as the 59th Street Bridge, it carries New York State Route 25 over the East River and connects the Long Island City neighborhood in the borough of Queens with Manhattan. Ammann's involvement with the Queensboro Bridge marked the beginning of a career in New York bridge-building that would span six decades.

From 1909 to 1912, Ammann worked for F.C. Kunz and C.C. Schneider in Philadelphia. In 1912, he began working for Gustav Lindenthal, helping with both the Hell Gate Bridge and the Sciotoville Bridge. From 1925 to 1938, he served as Director of Engineering at the Port of New York Authority. In 1933, the Triborough Bridge Authority was created and Robert Moses was named chairman. "Moses persuaded Ammann to join the [Triborough Bridge] authority as its chief engineer, supervising the creation of an engineering department, while concurrently serving in the same capacity for the Port Authority (Rastorfer 2000: 27). Given this dual responsibility subsequent to his role in overseeing construction of the Goethals and Outerbridge Crossing bridges, Ammann also served as chief engineer for construction of the 1931 Bayonne and George Washington bridges, the 1936 Triborough Bridge, and the 1939 Bronx-Whitestone Bridge. Later, after he had teamed with Charles S. Whitney to form Ammann and Whitney, he was senior partner on the 1957 Walt Whitman Bridge, the 1961 Throgs Neck Bridge, and the 1964 Verrazano-Narrows Bridge (Structurae: 2009a).

Other New York City Bridges

The engineering and historical significance of Goethals Bridge should necessarily be considered in the context of other major bridges in the New York City area, including those associated with the Port Authority and those not associated with the Port Authority. The Port Authority's Outerbridge Crossing, completed in the same year as Goethals Bridge and often referred to as a "twin" bridge to Goethals, used a nearly identical

cantilever through truss design but was longer with a truss span of 2,100 feet and a total length of 8,800 feet.

The year 1931 saw the completion of two major bridges by the Port Authority: the Bayonne Bridge and the George Washington Bridge. The Bayonne Bridge, designed by Othmar Ammann and Cass Gilbert, was the third bridge to link Staten Island and New Jersey. With its striking 1,675 foot steel arch span and a total elevated length of 6,695 feet, the bridge held the distinction of being the longest steel arch bridge in the world until 1978. It was awarded the “Most Beautiful Steel Bridge” prize in 1931 and in 1985 was designated a National Historic Civil Engineering Landmark (Port Authority 2004a: 2). The Bayonne Bridge continues to provide an important link on Staten Island, with access to the Verrazano-Narrows Bridge via the Martin Luther King, Jr. Expressway and I-278 east, as well as to Goethals Bridge via I-278 west and Outerbridge Crossing (via I-278 west and West Shore Expressway).

No less impressive was the George Washington Bridge (originally called the Fort Lee Bridge), also designed by Ammann and called “the most significant long-span suspension bridge of the twentieth century” (Rastorfer 2000: 39). Its massive towers carry the roadway 3,500 feet over the Hudson River, making it the fourth longest suspension bridge in the United States. It connects Fort Lee, New Jersey to the Washington Heights neighborhood of Manhattan and is considered to be one of the busiest bridges in the world (Rife 2006). Anticipating the oncoming automobile age, the six-lane bridge was designed so that it could be expanded in the ensuing decades. By 1946 two lanes had been added to the unpaved center strip, and in 1962 a lower level with six additional lanes was added.

The massive Verrazano-Narrows Bridge, designed by Ammann for the Triborough Bridge Authority while he was in private practice, was completed in 1964. The double-decked suspension bridge has a center span of 4,260 feet and was the largest suspension bridge in the world at the time of its construction (though surpassed by the 1981 Humber Bridge in the United Kingdom, it remains the largest suspension bridge in the United States). It connects Staten Island to Brooklyn and was named for the Italian explorer Giovanni da Verrazzano (also spelled Verrazano), the first known European to cross The Narrows to enter New York Harbor and the Hudson River (NYRoads.com 2009; MTA 2005).

National Register Eligibility

Significance Criteria and Level of Significance

As one of the first two undertakings of the Port Authority, Goethals Bridge represents a significant achievement that heralded an era of major expansion in the New York metropolitan area's transportation network. As a bi-state endeavor, it was out of necessity guided by regional cooperation amongst a variety of entities. While lacking the landmark-status architectural or engineering significance of the Port Authority's later

bridges, it is significant at the bi-state, New York - New Jersey regional level under National Register Criterion A in the areas of transportation history as a project which gave the agency confidence and lent public credibility to what was then a fledgling organization. Both the Goethals Bridge and Outerbridge Crossing Bridge are “representative of an era of rapid expansion of the New York and New Jersey transit systems during an economic boom of the early 1900s. The bridges constructed in this era were designed to alleviate the growing strain of the congested ferry system, which was the only connection between New York and New Jersey for automobiles and trucks at this time” (NYSOPRHP 2003).

The bridge is also eligible under Criterion C in the area of engineering for the innovative methods used in its construction and as the work of two noteworthy and highly successful bridge designers. Built in 1928, the bridge was designed by J.A.L. Waddell, with Othmar H. Ammann as construction supervisor and consulting architects York & Sawyer. Goethals Bridge is a surviving work from the later years of the career of prolific bridge designer John Alexander Low Waddell. Waddell’s lengthy career and civil engineering experience gave him the expertise necessary to help the Port Authority bring their first project to fruition, establishing the Port Authority as the leader in the region’s complex and constantly expanding transportation infrastructure. As both the Director of Engineering for the Port of New York Authority and the Chief Engineer at the Triborough Bridge Authority, and while in private practice, Othmar Ammann oversaw and/or designed many of New York City’s most significant bridges. Of the bridges created by Waddell and Ammann, Goethals Bridge is a relatively modest example of the accomplishments of these men.

Period of Significance

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for listing in the National Register; however, properties that meet the Criteria Consideration for properties achieving significance within the past 50 years may qualify. For significance within the past 50 years, a property must demonstrate exceptional importance under Criteria Consideration g. This not only applies to buildings, structures, or objects constructed within the past 50 years, but is applied to a structure’s period of significance.

Goethals Bridge, which was constructed to alleviate ferry congestion, has carried vehicular traffic between Staten Island and New Jersey since its completion. However, for the first 36 years, traffic levels across Goethals Bridge were not sufficient to generate the revenue required for its maintenance. The bridge is also not an exceptional example of the work of either Waddell or Ammann, or the numerous bridges associated with the Port Authority. Three years after the completion of the Goethals and Outerbridge Crossing bridges, larger and more challenging bridges (i.e., the George Washington and Bayonne bridges) had been constructed to span the waters between New York and New Jersey. When built, the George Washington and Bayonne bridges represented two of the world’s most impressive bridges, which also had been under construction simultaneously.

The nature of the site and the length of the span required shaped the design and construction of the George Washington Bridge. In 1931, the George Washington Bridge was the longest clear span, 3,500 feet in length, constructed in the world, and twice the size of the next longest bridge (Rastorfer 2006: 32). One of the unique features of the bridge was the absence of any stiffening truss, which has been in use since 1801 (Plowden 2002: 251). According to Plowden, three weeks after the George Washington was dedicated, the Port Authority opened another record-breaking span—the Bayonne Bridge over the Kill van Kull. The Bayonne Bridge added a third crossing between Staten Island and New Jersey. The bridge crossed the Kill van Kull, one of the busiest waterways in the United States, which required that the bridge have a high vertical clearance and a span of some 1,655 feet without supporting intermediate piers (Plowden 2002: 289). The topography and material costs led to the decision to build an arch bridge. At the time of its construction and for the next 45 years, the Bayonne Bridge arch was the longest clear span of its type in the world (Rastorfer 2007).

Goethals Bridge primary significance is as one of the two “first” bridge projects undertaken by the Port Authority. Goethals, however, was a modest structure in comparison with the monumental bridges that followed. As such, the Goethals Bridge does not appear to meet the additional conditions for significance within the past 50 years, Criteria Consideration g for exceptional importance, the period of significance is recommended from the date of its completion in 1928 to 1959 (50 years before the present day generally being considered the cut-off date for historic properties). Although traffic over the bridge was initially less than anticipated (as indicated by the insufficient toll revenues generated) and did not increase substantially until the Verrazano-Narrows Bridge was opened 1964, this latter date associated with the increased use of Goethals Bridge is not considered to be appropriate as a period-end date and the use of such date in this manner would be arbitrary. Likewise, a period of significance to a year after 1959 would need to be of “exceptional importance.” Since the bridge was constructed more than 50 years ago, is significant for associations with events and persons from more than 50 years ago, and continues in the same capacity as planned, the National Register 50-year rule has been used to determine the significance.³ While the bridge’s period of significance has been defined through 1959, it continues to serve a vital transportation link in the New York-New Jersey metropolitan region.

³ It is customary to use the 50-year rule for historic properties that are more than 50 years old when the period of significance occurred more than 50 years ago, with the provision that the period of significance continue to the 50-year mark, i.e. 50 years ago from the present. NJHPO generally follows this format for transportation related historic properties that are still in use.

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Enclosure 2:
**Updated List of Consulting
and Interested Parties**

Section 106 Consultation for Goethals Bridge Replacement

Updated List of Consulting and Interested Parties

8/21/09

The following is the updated list of consulting and interested parties in light of the future development of a Memorandum of Agreement (MOA) for the proposed Goethals Bridge Replacement (GBR). Any agencies/organizations identified with asterisks ("**") indicates that they would likely be signatories of the MOA.

Consulting Parties

<p>** Shelly Sugarman Permits Branch Chief, COMDT CG-54112 Bridge Division U.S. Coast Guard Headquarters (USCG-HQ) 2100 2nd Street S.W. Washington, D.C. 20593-0001</p>	<p>Dr. Teresa R. Pohlman, LEED AP Director, Occupational Safety & Environmental Programs Office of the Chief Administrative Officer Department of Homeland Security (DHS) U.S. Department of Homeland Security Washington, D.C. 20528</p>
<p>** ---Name, Title, Dept. To be determined--- The Port Authority of NY & NJ (PANYNJ) Two Gateway Center Newark, NJ 07102</p>	<p>Ms. Mary Ann Miller Project Manager U.S. Army Corps of Engineers - New York District (USACE) Jacob K. Javits Federal Building 26 Federal Plaza New York, NY 10278-0090</p>
<p>Mr. Reid J. Nelson Office of Federal Agency Programs Advisory Council on Historic Preservation (ACHP) Old Post Office Building 110 Pennsylvania Avenue, NW, Suite 809 Washington, DC 20004</p>	<p>Mr. Chris Bollwage, Mayor Office of the Mayor, City of Elizabeth City Hall of Elizabeth 50 Winfield Scott Plaza Elizabeth, NJ 07201</p>
<p>** Dan Saunders Acting Administrator and Deputy State Historic Preservation Officer New Jersey Department of Environmental Protection - Historic Preservation Office (NJHPO) 501 East State Street, 4th Floor P.O. Box 404 Trenton, NJ 08625-0404</p>	<p>Mr. James P. Molinaro Staten Island Borough President 120 Borough Hall Staten Island, NY 10301</p>
<p>** Ruth L. Pierpont Directory Field Service Bureau New York State Office of Parks, Recreation & Historic Preservation (NYSOPRHP) Peebles Island P.O. 189 Waterford, NY 12188-0189</p>	<p>Ms. Marta Bede Senior Project Manager New York City Economic Development Corporation (NYCEDC) 110 William Street New York, NY 10038</p>

Environmental Review Coordinator
**City of New York Landmarks Preservation
Commission (NYCLPC)**
1 Centre St., 9N
New York, NY 10007

Robert Kulikowski
Director
**Mayor's Office of Environmental Coordination
(OEC)**
253 Boradway, 14th Floor
New York, NY 10007

New Jersey Department of Transportation (NJDOT)
200 Stierli Court
Mt. Arlington, NJ 07856-1322

New Jersey Turnpike Authority (NJTA)
P.O. Box 5042
Woodbridge, NJ 07095-5042

**New York State Department of Transportation
(NYSDOT)**
Region 11
Hunters Point Plaza
47-40 21st Street
Long Island City, NY 11101

**New York City Department of Transportation
(NYCDOT)**
Tom Cocola
Staten Island Borough Commissioner
10 Richmond Terrace, Room 300
Staten Island, NY 10301

Interested Parties

**New York Metropolitan Transportation Council
(NYMTC)**
199 Water Street
22nd Floor
New York, NY 10038-3534

**North Jersey Transportation Planning Authority
(NJTPA)**
One Newark Center, 17th Floor
Newark, NJ 07102

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

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

Mr. William Frolich
President/Treasurer
Union County Historical Society
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Roselle, NJ 07203

Michelle Doran-McBean
Elizabeth Historical Society
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Elizabeth, NJ 07201

Elizabethtown Historical Foundation
PO Box 1
Elizabeth, NJ 07207

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

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

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

James Ferreri
President
Preservation League of Staten Island
52 Port Richmond Avenue
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Simeon Bankoff
Executive Directory
Historic Districts Council
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New York Railroad Enthusiasts
PO Box 040320
Staten Island, NY 10304

Chief Jerry Douglas
Delaware Tribe of Indians
Delaware Tribal Headquarters
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NAGPRA/Cultural Preservation Director
Delaware Nation of Oklahoma
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Rebecca A. Hawkings
THPO, Tribal Administrator
Belinda Pryor
Assistant THPO, Assistant Directory Historic
Preservation Department
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Karen Kaniatobe
Absentee-Shawnee Tribe Headquarters
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New Jersey Commission of American Indian Affairs
Rankokus Indian Reservation
P.O. Box 225
Rancocas, NJ 08073

Mark Gould
Tribal Chairman
Nanticoke Lenni-Lenape Indians of New Jersey
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Bridgeton, NJ 08302

Frank E. Sanchis, III
Senior Vice-President
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Dr. Samuel W. Beeler, Jr.
Principal Chief
Sand Hill Indians
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River Street Station
Patterson, NJ 07544-0955

Sherry White, THPO
**Stockbridge-Munsee Community Band of Mohican
Indians**
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N. 8476 Mo He Con Nuck Road
Bowler, Wisconsin 54416

Chief Harry B. Wallace
Unkechaug Nation
207 Poospansk Lane
Mastic, NY 11950

Enclosure 3:
ACHP Response Letter
of June 2, 2009.



Preserving America's Heritage

June 2, 2009

Ms. Shelly Sugarman
Chief, Permits Branch
USCG Bridge Program
2100 Second Street SW
Washington, DC 20593-0001

RE: *U.S. Department of Homeland Security, U.S. Coast Guard
Approval of Goethals Bridge Project
Elizabeth, New Jersey and Staten Island, New York*

Dear Ms. Sugarman:

On May 14, 2008, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and you determine that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR Part 800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the New Jersey and New York SHPOs and any other consulting parties, and related documentation at the conclusion of the consultation process to complete the requirements of Section 106 of the National Historic Preservation Act. Please provide information on how the views of the public and other consulting parties, including Indian tribes, were taken into account when DHS files the final MOA with the ACHP.

Thank you for providing the ACHP with your notification of adverse effect. If you have any questions, please contact Blythe Semmer at 202-606-8552 or via e-mail at bsemmer@achp.gov.

Sincerely,

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

LaShavio Johnson
Historic Preservation Technician
Federal Permitting, Licensing and Assistance Section
Office of Federal Agency Programs

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

16591/Goethals Bridge
August 21, 2009

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 (GBR)

Section 106 Consultation with NYSOPRHP (04PR3162):

- (1) **Expanded Statement of Significance for the Goethals Bridge**
- (2) **Updated List of Consulting and Interested Parties**
- (3) **ACHP Response Letter of June 2, 2009.**

Dear Ms. Pierpont:

Following the Project Initiation Letter (PIL) of June 17th, 2005 and under the Section 106 Consultation for the GBR EIS, the U.S. Coast Guard (USCG) is transmitting the enclosed documents for your review and information. For the Goethals Bridge Replacement (or Proposed Project), The Port Authority of New York and New Jersey (PANYNJ) is the project sponsor while the USCG is the federal lead agency for the preparation of the EIS in accordance with the National Environmental Policy Act (NEPA) of 1969.

Subsequent to USCG's determination of Adverse Effect on three historic architectural resources and NJHPO and NYSOPRHP's concurrence, a Memorandum of Agreement (MOA) will need to be prepared for the Proposed Project, pursuant to Section 106 Consultation (36 CFR 800.6). To that end, a pre-MOA Meeting was held with NJHPO and NYSOPRHP on April 20th, 2009, during which the following requests were made:

1. NJHPO requested that the previous statements of significance be supplemented to examine and recommend the level of significance, indicate a period of significance, and address significance Criterion C as the work of a master, as appropriate. The *Expanded Statement of Significance for the Goethals Bridge*, which builds on the previous significance statements of eligibility of the Goethals Bridge in the areas of Transportation/Development (Criterion A) and Engineering (Criterion C) (NJHPO 1995; OPRHP 1994), is herein attached for your review.
2. NJHPO and NYSOPRHP requested that the current list of Consulting and Interested Parties (originally submitted as part of the PIL) be updated in light of a future MOA preparation and execution. The *Updated List of Consulting and Interested Parties* is herein attached for your review. It should be noted that all parties identified in such list have already been actively participating in or made aware of the Proposed Project

through the USCG's NEPA environmental review, public outreach program, and its recently published GBR DEIS.

- 3. Following NJHPO and NYSOPRHP's request, the USCG notified the Advisory Council on Historic Preservation (ACHP) in May 2009 of the determination of Adverse Effect, and formally invited ACHP to participate in the development of the MOA (that letter dated 5/13/09 was copied to your agency). By letter dated 6/2/09, copy enclosed, the ACHP advised that they will not participate in the MOA development, but reserve the right to reconsider at a later date should consulting or interested parties request so.

The following NYSOPRHP staffs have been involved with the GBR EIS since the beginning of our on-going consultation effort with your agency:

- Doug Mackey and Beth Cumming for issues and affairs on Archaeological Resources, and
- James Warren for issues and affairs on Historic Resources.

As noted previously, the USCG 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 directly with your agency during this consultation. To that effect, please feel free to contact Deborah Van Steen at 973-407-1260 or Susan Grzybowski at 973-407-1266 with any questions or comments concerning the enclosed report. Otherwise, please call me at 212-668-7021.

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

Sincerely,



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

Enclosures:

- Expanded Statement of Significance for the Goethals Bridge.
- Updated List of Consulting and Interested Parties.
- ACHP Response Letter of June 2, 2009.

Copy:

Dan Saunders (NJHPO)
 Andrea Tingey (NJHPO)
 James Warren (NYSOPRHP)
 Coleen Hopson (PANYNJ)
 Ken Hess (Berger/PB)

Judith Versenyi (Berger/PB)
 Susan Grzybowski (Berger/PB)
 Kris Beadenkopf (Berger/PB)
 Deborah Van Steen (Berger/PB)

Enclosure 1:
Expanded Statement of
Significance for the Goethals Bridge

**GOETHALS BRIDGE
ELIZABETH, NEW JERSEY
STATEN ISLAND, NEW YORK**

EXPANDED STATEMENT OF SIGNIFICANCE

August 2009

Introduction

The Goethals Bridge, as well as its sister bridge, Outerbridge Crossing, have opinions/determinations of eligibility for inclusion in the National Register of Historic Places by both the New Jersey State Historic Preservation Office and the New York State Office of Parks, Recreation and Historic Preservation, which are the two State Historic Preservation Offices (SHPO) with consultation jurisdiction for both bridges. The bridges were photographed in 1991 for the Historic American Engineering Record by Jet Lowe. In 2008, the New York City Landmarks Preservation Commission determined that the Goethals Bridge does not appear to be eligible for designation as a New York City Landmark. At present, the Port Authority of New York and New Jersey, as the project sponsor, have proposed replacement of the Goethals Bridge in order to improve this crossing of the Arthur Kill between New Jersey and Staten Island. The U.S. Coast Guard (USCG), as the lead federal agency, is responsible for conducting the required environmental process pursuant to National Environmental Policy Act (NEPA) of 1969, as amended, and Section 106 of the National Historic Preservation Act (NHPA) of 1966.

In compliance with the NEPA review process and the NHPA Section 106 consultation process, the SHPO(s) are consulted when a federal undertaking impacts a historic property. As part of this consultation, the New Jersey Historic Preservation Office has requested that the previous statements of significance be supplemented to examine and recommend the level of significance, indicate a period of significance, and address significance Criterion C as the work of a master, as appropriate. This expanded statement of significance builds on the previous significance statements of eligibility of the Goethals Bridge in the areas of Transportation/Development (Criterion A) and Engineering (Criterion C) (NJHPO 1995; OPRHP 1994). To accomplish this, a more complete context, history, and narrative have been crafted by Louis Berger Group's architectural historians Deborah Van Steen and Michael Yengling.

Significance

Goethals Bridge was completed in 1928 and is a cantilever steel truss bridge that spans the Arthur Kill between New York and New Jersey. With a truss span of 1,152 feet and a total elevated length of 7,109 feet, it represents the early growth of the Port Authority of New York and New Jersey (then known as the Port of New York Authority). It connects the Howland Hook section of Staten Island, New York with Elizabeth, New Jersey and,

together with its larger “twin” bridge, Outerbridge Crossing (which connects Staten Island to Perth Amboy, New Jersey), was the first vehicular crossing constructed by the Port Authority. Early in its construction, the bridge was referred to in a 1926 article as the “Elizabeth-Howland Hook Bridge” (Ammann 1926: 346). In an article the following year, it was referred to simply as the “Elizabeth bridge” (ENR 1927: 744). It was originally supposed to be called the Arthur Kill Bridge but was renamed before its dedication to honor Major General George Washington Goethals. Goethals was the first consulting engineer to the Port Authority and chief engineer of the Panama Canal. He assisted during the design and construction of the bridge but passed away before its completion.

Goethals Bridge was designed by the New York City-based engineering practice of Waddell and Hardesty (now Hardesty & Hanover). The firm was founded by civil engineer John Alexander Low Waddell, designer of many bridges worldwide and author of a number of bridge engineering texts (Plattner 1994). Although Waddell is generally cited as the designer of Goethals Bridge, this responsibility is sometimes attributed to his lesser-known partner Shortridge Hardesty. Construction of the bridge was supervised by Port Authority engineer Othmar H. Ammann, who would later design the Bayonne, George Washington, and Verrazano-Narrows bridges. The 1931 Bayonne Bridge, which connects Staten Island to Bayonne, New Jersey, was the longest steel arch bridge in the world until 1978. It now ranks third (Port Authority 2004a: 2).

Goethals Bridge possesses bi-state, New York - New Jersey regional significance for its role in the rapid development of the bi-state, New York - New Jersey regional transportation infrastructure of New York City’s metropolitan area in the 1920s and 1930s. It embodies the necessary cooperation between the states of New York and New Jersey as well as other entities (including the War Department and the State of New York Bureau of Fine Arts) involved with an interstate bridge crossing of a major shipping channel. It also heralded the highway as the dominant form of transportation between the New Jersey mainland and New York, replacing three of the four ferries that had carried people and automobiles across the Arthur Kill.

Background

Crossing the Arthur Kill

Long before any bridges had been constructed across the Arthur Kill, ferry boats were the dominant mode of transportation between what would become the boroughs of New York City and the neighboring state of New Jersey. The first regular ferry crossing of the Hudson River was in 1661, between Communipaw and New Amsterdam. The earliest ferries were rowboats which used oars, followed by horse-propelled boats, which were then superseded by steam-propelled ferries beginning in 1811. Ferries served Staten Island prior to the Revolutionary War, with routes becoming established from Elizabeth and Perth Amboy, New Jersey, across the Arthur Kill; from Bergen, New Jersey, across the Kill Van Kull; and from Long Island across the Narrows. In 1817, a steam ferry that

served part of a New York to Philadelphia highway route passed through the Arthur Kill between Manhattan and Tompkinsville. This line was moved to the St. George terminal at the north end of Staten Island in 1905. There was also, until 1929, a ferry across the Arthur Kill from Carteret, New Jersey (Port Authority 1925: 15). Following the end of World War I, it was estimated that ferries transported 12 million vehicles annually between New Jersey and Manhattan, a number that reflected increasing congestion due to automobile and truck traffic (Mead & Hunt 1999: 61).

Although the construction of highway bridges is frequently cited as coinciding with the elimination of ferry service to Staten Island, three ferries continued to connect Staten Island with the New Jersey mainland until the early 1960s: two across Arthur Kill and one across Kill Van Kull. Ironically, the ferry that stopped in 1929 (following the construction of the Goethals and Outerbridge Crossing bridges) was the farthest away, serving the northernmost route between Carteret and Staten Island (Cudahy 1990: 285). It would be over three decades before the remaining three ferries shut down: the Elizabeth route in 1961, the Bergen route in 1962, and the Perth Amboy route in 1963 (Cudahy 1990: 289).

Prior to the construction of Goethals Bridge and Outerbridge Crossing in 1928, the only bridge across the Arthur Kill was a ca. 1889 single-track swing bridge serving the Baltimore and Ohio Railroad (Plattner 2004). The construction of a highway bridge between New Jersey and Staten Island had been discussed as far back as 1868; early proposals languished, however, due to the logistical and legislative complexities of building an interstate bridge in a burgeoning metropolitan area. The project was revived in 1921 by Union County, New Jersey's Board of Chosen Freeholders, who advocated for either a bridge or tunnel across the Arthur Kill connecting Elizabeth to New York's Richmond Borough (Port Authority 1925: 18). The New Jersey Legislature awarded \$10,000 towards preliminary surveys, drawings, and construction estimates, an amount that was matched by the Board of Estimate and Apportionment of New York City. The realization that New Jersey law required Federal sanction in order to execute a legal agreement between adjoining communities in different states made high-level cooperation amongst the various parties indispensable to the proposed endeavor (Port Authority 1925: 19).

The preliminary studies, which were conducted by the Tunnel Division of the office of the Chief Engineer of New York's Board of Estimate and Apportionment, first suggested a low-level bridge on the basis of cost. It was suggested that the Baltimore and Ohio Railroad endeavor to construct a bascule bridge more conducive to water traffic (the swing bridge had only 31 feet of vertical clearance above the water) with an adjoining 50-foot wide highway bridge, the additional cost of which would be charged equally to the states of New York and New Jersey. This approach would do away with the need for federal sanction and a complicated agreement between the two states (Port Authority 1925: 20).

No immediate moves were made towards construction of the proposed combination railroad / highway bridge and in 1923, prompted by severe congestion on the ferries

servicing the Arthur Kill, a new study was conducted by the New York and New Jersey Bridge and Tunnel Commissions. The Commissions' reports highlighted the importance of a fixed crossing with regards to fostering the economic development of the area and remedying worsening traffic congestion. A bridge was cited as being preferable to a tunnel, and a cantilever bridge in particular was recommended (Port Authority 1925: 21).

In early 1924, bills were passed by the Legislatures of both New York and New Jersey authorizing the young Port of New York Authority (an agency of both states) to construct two toll bridges: one between Elizabeth, New Jersey and Howland Hook, New York; and one between Perth Amboy, New Jersey and Tottenville, New York. The bills became law in April 1924, providing the go-ahead for the Port Authority's first large-scale undertaking (Port Authority 1925: 22).

The Port Authority

Created as the Port of New York Authority in April 1921, the Port Authority, as it is commonly called, was born out of the conflict between the states of New York and New Jersey over their common waterways, including the Hudson River and the New York Harbor. Spurred by a debate over artificially high freight railroad rates which put New Jersey's ports at a disadvantage relative to Manhattan Island, the need for a means of mutually managing transportation and shipping activities in the Port of New York became apparent (Funding Universe 2009).

Julius Henry Cohen, counsel of the New York State Chamber of Commerce, encouraged the creation of a bi-state commission of New York and New Jersey politicians in 1917. In 1919, he unveiled a proposal for a "Port of New York Authority," modeled to a large extent on the well-known Port of London Authority (Funding Universe 2009). Referred to decades later as "a regional planner's dream," Cohen's proposal was approved (in a somewhat diluted form) by the two states in April 1921, and the organization released its first comprehensive plan in December 1921 (Doig 2001: 49). The comprehensive plan sought to improve the area's transportation problems and promote economic growth through a more orderly network of railroad tracks, tunnels, and marine terminals.

Although proposals for more ambitious projects had been put forward, the Authority's first projects were the Goethals and Outerbridge Crossing bridges across the Arthur Kill. Although there was some opposition to the projects on the basis that the bridges would hinder shipping traffic in the waterway, they were approved in the spring of 1925 by the War Department, which deemed the 135-foot clearance more than sufficient. The Port Authority financed the construction of the bridges through the sale of \$14 million in bonds.

Roughly three years later, Goethals Bridge opened to traffic on June 29, 1928, the same day as Outerbridge Crossing. When asked a number of years later why these two bridges were chosen as the Authority's first projects, Julius Cohen noted that "We wanted to begin with something where we were most likely to succeed, and the smaller enterprise was the better one for the purpose. If we succeeded, the George Washington Bridge

would come later. And so it did” (Richmond 2005: 101). As the first major undertaking of the Port Authority, Goethals Bridge demonstrated the agency’s ability to successfully coordinate large-scale projects and paved the way for even bigger endeavors such as the George Washington Bridge in 1931, Bayonne Bridge in 1931, and the World Trade Center in 1970. The Authority also expanded its involvement from bridges, tunnels, bus terminals, and buildings to include commercial and general aviation and port facilities: it took over the management of Newark Airport (which opened in 1928) in 1945, and in 1947 took over LaGuardia Airport and John F. Kennedy Airport (then New York International).¹

The agency was renamed the Port Authority of New York and New Jersey in 1972 and is described as “a self-supporting public corporation that develops and operates trade and transportation facilities in an area of New York and New Jersey that falls within a 25-mile radius of the Statue of Liberty.” (Funding Universe 2009: 1).

Design and Construction

Original Design and Construction

More than a mile long, Goethals Bridge is a major bridge in the New York City area and was one of the two first automobile bridges to span the Arthur Kill between New Jersey and Staten Island. It operates as a two-way, four-lane toll bridge with a truss span of 1,152 feet and a total elevated length of 7,109 feet. The suspended main span is 672 feet long and uses a cantilever steel through truss. The side spans are each 240 feet long. By today’s standards, the traffic lanes are extremely narrow at only 10 feet each – one of the concerns that has led to proposed replacement and/or expansion plans for the 81 year-old bridge in recent years.

According to the records of the New Jersey State Historic Preservation office, “Although not renowned for its architectural details, the Goethals Bridge was notable from an engineering standpoint at the time of its construction” (Plattner 2004). In order to maintain an open shipping channel in the waterway the bridge was designed to have a mean high water clearance of 135 feet, a height that required extremely long approach spans. The graded viaduct on both sides amounted to approximately 6,000 feet, requiring 75 concrete piers. Together with its approaches, the bridge is in excess of 11,800 feet in length (Plattner 2004).

The high-level cantilever spans are supported by arched reinforced concrete piers. The viaduct approaches, which follow a 4% grade from main bridge to plazas at either end, consist of steel girders on top of arched concrete piers. Due to the long length of the approaches and the varied soil and subsurface conditions both on land and in the channel, a variety of pier foundations were used: wood-pile foundations; wood-sheeted or steel-

¹ Initially named Idlewild Municipal Airport, the Airport’s official names changed to New York Municipal, followed by New York International Airport and later JFK, but Idlewild, the name of the old golf course, continued to be the commonly-used name. See Gordon, 2004.

pile open cofferdams; and pneumatic caissons. The mid-stream piers were sunk fifty feet below the bottom of the channel (Eastern Roads 2007: 2). Construction of the bridge's substructure on the New York side was performed by the Frederick Snare Corp., with engineer Randall Cremer and superintendent D.H. Cameron. The substructure on the New Jersey side was constructed by the Triest Contracting Corp., with superintendent C.M. Rauterkus. Paving of the bridge was done by Albert A Volk, Inc. of New York, and the plazas at either end of the bridge were paved by the Elizabeth Paving Company of New Jersey.²

Additions and Alterations

Although it was originally designed with a walkway for pedestrian and bicycle traffic, Goethals Bridge was altered to accommodate strictly automobile traffic (Eastern Roads 2007: 2). Changes to the bridge since its construction include the installation of a concrete median and parapets; "fender cells" in the Arthur Kill to protect the north and south sides of the main Staten Island pier from errant vessels; and construction of a toll plaza and administration and maintenance buildings on Staten Island in 1964. The construction of new roadways and ramps associated with the New Jersey Turnpike on the New Jersey side necessitated the removal and/or replacement of some of the original arched concrete piers.

J.A.L. Waddell

John Alexander Low Waddell was born in 1854 and obtained his degree from Rensselaer Polytechnic Institute in Troy, New York in 1871. Prior to his career as a designer of bridges, he worked for Canada's Marine Department of the Dominion and the Canadian Pacific Railway. He moved back to the United States and designed coal mines in West Virginia before teaching mechanics at Rensselaer from 1878 to 1880. After obtaining another degree from McGill University in Montreal, Canada, Waddell traveled to Japan and taught at the Imperial University of Tokyo from 1882 to 1886. In 1887, he founded his own engineering firm in Kansas City, Missouri. His work in that region of the country included: the 1898 Waddell "A" Truss Bridge (now demolished) in Clinton County, Missouri; the 1911 Armour-Swift-Burlington Bridge in Kansas City; and the 1917 Detroit-Superior Bridge in Cleveland, Ohio.

In 1920 Waddell took his practice to New York and consulted on a number of bridge designs, including: the 1926 Central Railroad of New Jersey (CRRNJ) Newark Bay lift bridge (demolished in 1980); the 1928 Goethals Bridge and Outerbridge Crossing; the 1929 Grace Memorial Bridge in Charleston, South Carolina (now demolished); and the

² The reference to the plaza at each end of the bridge appears to refer to special treatment at the start of the approach spans and was the paved area that provided access to the bridge. It is not a toll plaza (the contemporary idea of a roadway-related plaza). The toll booths on the NY side were located in the original NY plaza area. The plaza on the NJ side was most likely removed for construction of the New Jersey Turnpike interchange.

1931 Anthony Wayne Bridge, a suspension bridge in Toledo, Ohio (Structurae 2009). At 1.9 miles in length, Grace Memorial Bridge was a major river crossing and the largest steel truss bridge in South Carolina. When it was constructed, it was the fifth longest cantilever span in the world (HAER 1968). Though Waddell has been cited as having been involved in the design of more than 1,000 bridges worldwide, many of them have been demolished and/or replaced and those that continue to survive are a dwindling resource.

Othmar H. Ammann

Othmar Herman Ammann was born in Zurich, Switzerland in 1879 and studied at the Federal Technological Institute in Zurich from 1898 to 1902. He immigrated to the United States in 1904 and worked for Joseph Meyer of New York, after which he became an assistant to the chief engineer of the Pennsylvania Steel Company. In that capacity, he assisted with the design of New York's Queensboro Bridge, a double cantilever span completed in 1909. Also known as the 59th Street Bridge, it carries New York State Route 25 over the East River and connects the Long Island City neighborhood in the borough of Queens with Manhattan. Ammann's involvement with the Queensboro Bridge marked the beginning of a career in New York bridge-building that would span six decades.

From 1909 to 1912, Ammann worked for F.C. Kunz and C.C. Schneider in Philadelphia. In 1912, he began working for Gustav Lindenthal, helping with both the Hell Gate Bridge and the Sciotoville Bridge. From 1925 to 1938, he served as Director of Engineering at the Port of New York Authority. In 1933, the Triborough Bridge Authority was created and Robert Moses was named chairman. "Moses persuaded Ammann to join the [Triborough Bridge] authority as its chief engineer, supervising the creation of an engineering department, while concurrently serving in the same capacity for the Port Authority (Rastorfer 2000: 27). Given this dual responsibility subsequent to his role in overseeing construction of the Goethals and Outerbridge Crossing bridges, Ammann also served as chief engineer for construction of the 1931 Bayonne and George Washington bridges, the 1936 Triborough Bridge, and the 1939 Bronx-Whitestone Bridge. Later, after he had teamed with Charles S. Whitney to form Ammann and Whitney, he was senior partner on the 1957 Walt Whitman Bridge, the 1961 Throgs Neck Bridge, and the 1964 Verrazano-Narrows Bridge (Structurae: 2009a).

Other New York City Bridges

The engineering and historical significance of Goethals Bridge should necessarily be considered in the context of other major bridges in the New York City area, including those associated with the Port Authority and those not associated with the Port Authority. The Port Authority's Outerbridge Crossing, completed in the same year as Goethals Bridge and often referred to as a "twin" bridge to Goethals, used a nearly identical

cantilever through truss design but was longer with a truss span of 2,100 feet and a total length of 8,800 feet.

The year 1931 saw the completion of two major bridges by the Port Authority: the Bayonne Bridge and the George Washington Bridge. The Bayonne Bridge, designed by Othmar Ammann and Cass Gilbert, was the third bridge to link Staten Island and New Jersey. With its striking 1,675 foot steel arch span and a total elevated length of 6,695 feet, the bridge held the distinction of being the longest steel arch bridge in the world until 1978. It was awarded the “Most Beautiful Steel Bridge” prize in 1931 and in 1985 was designated a National Historic Civil Engineering Landmark (Port Authority 2004a: 2). The Bayonne Bridge continues to provide an important link on Staten Island, with access to the Verrazano-Narrows Bridge via the Martin Luther King, Jr. Expressway and I-278 east, as well as to Goethals Bridge via I-278 west and Outerbridge Crossing (via I-278 west and West Shore Expressway).

No less impressive was the George Washington Bridge (originally called the Fort Lee Bridge), also designed by Ammann and called “the most significant long-span suspension bridge of the twentieth century” (Rastorfer 2000: 39). Its massive towers carry the roadway 3,500 feet over the Hudson River, making it the fourth longest suspension bridge in the United States. It connects Fort Lee, New Jersey to the Washington Heights neighborhood of Manhattan and is considered to be one of the busiest bridges in the world (Rife 2006). Anticipating the oncoming automobile age, the six-lane bridge was designed so that it could be expanded in the ensuing decades. By 1946 two lanes had been added to the unpaved center strip, and in 1962 a lower level with six additional lanes was added.

The massive Verrazano-Narrows Bridge, designed by Ammann for the Triborough Bridge Authority while he was in private practice, was completed in 1964. The double-decked suspension bridge has a center span of 4,260 feet and was the largest suspension bridge in the world at the time of its construction (though surpassed by the 1981 Humber Bridge in the United Kingdom, it remains the largest suspension bridge in the United States). It connects Staten Island to Brooklyn and was named for the Italian explorer Giovanni da Verrazzano (also spelled Verrazano), the first known European to cross The Narrows to enter New York Harbor and the Hudson River (NYRoads.com 2009; MTA 2005).

National Register Eligibility

Significance Criteria and Level of Significance

As one of the first two undertakings of the Port Authority, Goethals Bridge represents a significant achievement that heralded an era of major expansion in the New York metropolitan area's transportation network. As a bi-state endeavor, it was out of necessity guided by regional cooperation amongst a variety of entities. While lacking the landmark-status architectural or engineering significance of the Port Authority's later

bridges, it is significant at the bi-state, New York - New Jersey regional level under National Register Criterion A in the areas of transportation history as a project which gave the agency confidence and lent public credibility to what was then a fledgling organization. Both the Goethals Bridge and Outerbridge Crossing Bridge are “representative of an era of rapid expansion of the New York and New Jersey transit systems during an economic boom of the early 1900s. The bridges constructed in this era were designed to alleviate the growing strain of the congested ferry system, which was the only connection between New York and New Jersey for automobiles and trucks at this time” (NYSOPRHP 2003).

The bridge is also eligible under Criterion C in the area of engineering for the innovative methods used in its construction and as the work of two noteworthy and highly successful bridge designers. Built in 1928, the bridge was designed by J.A.L. Waddell, with Othmar H. Ammann as construction supervisor and consulting architects York & Sawyer. Goethals Bridge is a surviving work from the later years of the career of prolific bridge designer John Alexander Low Waddell. Waddell’s lengthy career and civil engineering experience gave him the expertise necessary to help the Port Authority bring their first project to fruition, establishing the Port Authority as the leader in the region’s complex and constantly expanding transportation infrastructure. As both the Director of Engineering for the Port of New York Authority and the Chief Engineer at the Triborough Bridge Authority, and while in private practice, Othmar Ammann oversaw and/or designed many of New York City’s most significant bridges. Of the bridges created by Waddell and Ammann, Goethals Bridge is a relatively modest example of the accomplishments of these men.

Period of Significance

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for listing in the National Register; however, properties that meet the Criteria Consideration for properties achieving significance within the past 50 years may qualify. For significance within the past 50 years, a property must demonstrate exceptional importance under Criteria Consideration g. This not only applies to buildings, structures, or objects constructed within the past 50 years, but is applied to a structure’s period of significance.

Goethals Bridge, which was constructed to alleviate ferry congestion, has carried vehicular traffic between Staten Island and New Jersey since its completion. However, for the first 36 years, traffic levels across Goethals Bridge were not sufficient to generate the revenue required for its maintenance. The bridge is also not an exceptional example of the work of either Waddell or Ammann, or the numerous bridges associated with the Port Authority. Three years after the completion of the Goethals and Outerbridge Crossing bridges, larger and more challenging bridges (i.e., the George Washington and Bayonne bridges) had been constructed to span the waters between New York and New Jersey. When built, the George Washington and Bayonne bridges represented two of the world’s most impressive bridges, which also had been under construction simultaneously.

The nature of the site and the length of the span required shaped the design and construction of the George Washington Bridge. In 1931, the George Washington Bridge was the longest clear span, 3,500 feet in length, constructed in the world, and twice the size of the next longest bridge (Rastorfer 2006: 32). One of the unique features of the bridge was the absence of any stiffening truss, which has been in use since 1801 (Plowden 2002: 251). According to Plowden, three weeks after the George Washington was dedicated, the Port Authority opened another record-breaking span—the Bayonne Bridge over the Kill van Kull. The Bayonne Bridge added a third crossing between Staten Island and New Jersey. The bridge crossed the Kill van Kull, one of the busiest waterways in the United States, which required that the bridge have a high vertical clearance and a span of some 1,655 feet without supporting intermediate piers (Plowden 2002: 289). The topography and material costs led to the decision to build an arch bridge. At the time of its construction and for the next 45 years, the Bayonne Bridge arch was the longest clear span of its type in the world (Rastorfer 2007).

Goethals Bridge primary significance is as one of the two “first” bridge projects undertaken by the Port Authority. Goethals, however, was a modest structure in comparison with the monumental bridges that followed. As such, the Goethals Bridge does not appear to meet the additional conditions for significance within the past 50 years, Criteria Consideration g for exceptional importance, the period of significance is recommended from the date of its completion in 1928 to 1959 (50 years before the present day generally being considered the cut-off date for historic properties). Although traffic over the bridge was initially less than anticipated (as indicated by the insufficient toll revenues generated) and did not increase substantially until the Verrazano-Narrows Bridge was opened 1964, this latter date associated with the increased use of Goethals Bridge is not considered to be appropriate as a period-end date and the use of such date in this manner would be arbitrary. Likewise, a period of significance to a year after 1959 would need to be of “exceptional importance.” Since the bridge was constructed more than 50 years ago, is significant for associations with events and persons from more than 50 years ago, and continues in the same capacity as planned, the National Register 50-year rule has been used to determine the significance.³ While the bridge’s period of significance has been defined through 1959, it continues to serve a vital transportation link in the New York-New Jersey metropolitan region.

³ It is customary to use the 50-year rule for historic properties that are more than 50 years old when the period of significance occurred more than 50 years ago, with the provision that the period of significance continue to the 50-year mark, i.e. 50 years ago from the present. NJHPO generally follows this format for transportation related historic properties that are still in use.

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Enclosure 2:
**Updated List of Consulting
and Interested Parties**

Section 106 Consultation for Goethals Bridge Replacement

Updated List of Consulting and Interested Parties

8/21/09

The following is the updated list of consulting and interested parties in light of the future development of a Memorandum of Agreement (MOA) for the proposed Goethals Bridge Replacement (GBR). Any agencies/organizations identified with asterisks ("**") indicates that they would likely be signatories of the MOA.

Consulting Parties

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Chief Jerry Douglas
Delaware Tribe of Indians
Delaware Tribal Headquarters
220 Northwest Virginia Avenue
Bartlesville, Oklahoma 74003

Tamara Francis
NAGPRA/Cultural Preservation Director
Delaware Nation of Oklahoma
P.O. Box 825
Anadarko, Oklahoma 73005

Rebecca A. Hawkings
THPO, Tribal Administrator
Belinda Pryor
Assistant THPO, Assistant Directory Historic
Preservation Department
Shawnee Tribe
29 South Highway 69A
Miami, Oklahoma 74354

Karen Kaniatobe
Absentee-Shawnee Tribe Headquarters
2025 South Gordon Cooper Drive
Shawnee, Oklahoma 74801

New Jersey Commission of American Indian Affairs
Rankokus Indian Reservation
P.O. Box 225
Rancocas, NJ 08073

Mark Gould
Tribal Chairman
Nanticoke Lenni-Lenape Indians of New Jersey
P.O. Box 544
Bridgeton, NJ 08302

Frank E. Sanchis, III
Senior Vice-President
The Municipal Art Society of New York
457 Madison Avenue
New York, NY 10022

Dr. Samuel W. Beeler, Jr.
Principal Chief
Sand Hill Indians
P.O. Box 955
River Street Station
Patterson, NJ 07544-0955

Sherry White, THPO
**Stockbridge-Munsee Community Band of Mohican
Indians**
P.O. Box 70
N. 8476 Mo He Con Nuck Road
Bowler, Wisconsin 54416

Chief Harry B. Wallace
Unkechaug Nation
207 Poospansk Lane
Mastic, NY 11950

Enclosure 3:
ACHP Response Letter
of June 2, 2009.



Preserving America's Heritage

June 2, 2009

Ms. Shelly Sugarman
Chief, Permits Branch
USCG Bridge Program
2100 Second Street SW
Washington, DC 20593-0001

RE: *U.S. Department of Homeland Security, U.S. Coast Guard
Approval of Goethals Bridge Project
Elizabeth, New Jersey and Staten Island, New York*

Dear Ms. Sugarman:

On May 14, 2008, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and you determine that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR Part 800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the New Jersey and New York SHPOs and any other consulting parties, and related documentation at the conclusion of the consultation process to complete the requirements of Section 106 of the National Historic Preservation Act. Please provide information on how the views of the public and other consulting parties, including Indian tribes, were taken into account when DHS files the final MOA with the ACHP.

Thank you for providing the ACHP with your notification of adverse effect. If you have any questions, please contact Blythe Semmer at 202-606-8552 or via e-mail at bsemmer@achp.gov.

Sincerely,

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

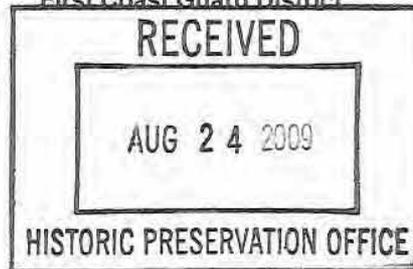
LaShavio Johnson
Historic Preservation Technician
Federal Permitting, Licensing and Assistance Section
Office of Federal Agency Programs

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

16591/Goethals Bridge
August 21, 2009

Mr. Dan Saunders
Acting Administrator and 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 (GBR)

Section 106 Consultation with NJHPO:

- (1) **Expanded Statement of Significance for the Goethals Bridge**
- (2) **Updated List of Consulting and Interested Parties**
- (3) **ACHP Response Letter of June 2, 2009.**

05-0030-17 AT
HPO-L2009-171
RECEIVED
DEC 28 2009
BY:

Dear Mr. Saunders:

Following the Project Initiation Letter (PIL) of June 17th, 2005 and under the Section 106 Consultation for the GBR EIS, the U.S. Coast Guard (USCG) is transmitting the enclosed documents for your review and information. For the Goethals Bridge Replacement (or Proposed Project), The Port Authority of New York and New Jersey (PANYNJ) is the project sponsor while the USCG is the federal lead agency for the preparation of the EIS in accordance with the National Environmental Policy Act (NEPA) of 1969.

Subsequent to USCG's determination of Adverse Effect on three historic architectural resources and NJHPO and NYSOPRHP's concurrence, a Memorandum of Agreement (MOA) will need to be prepared for the Proposed Project, pursuant to Section 106 Consultation (36 CFR 800.6). To that end, a pre-MOA Meeting was held with NJHPO and NYSOPRHP on April 20th, 2009, during which the following requests were made:

1. NJHPO requested that the previous statements of significance be supplemented to examine and recommend the level of significance, indicate a period of significance, and address significance Criterion C as the work of a master, as appropriate. The *Expanded Statement of Significance for the Goethals Bridge*, which builds on the previous significance statements of eligibility of the Goethals Bridge in the areas of Transportation/Development (Criterion A) and Engineering (Criterion C) (NJHPO 1995; OPRHP 1994), is herein attached for your review.
2. NJHPO and NYSOPRHP requested that the current list of Consulting and Interested Parties (originally submitted as part of the PIL) be updated in light of a future MOA preparation and execution. The *Updated List of Consulting and Interested Parties* is herein attached for your review. It should be noted that all parties identified in such list have already been actively participating in or made aware of the Proposed Project

Subj: GOETHALS

16591

through the USCG's NEPA environmental review, public outreach program, and its recently published GBR DEIS.

3. Following NJHPO and NYSOPRHP's request, the USCG notified the Advisory Council on Historic Preservation (ACHP) in May 2009 of the determination of Adverse Effect, and formally invited ACHP to participate in the development of the MOA (that letter dated 5/13/09 was copied to your agency). By letter dated 6/2/09, copy enclosed, the ACHP advised that they will not participate in the MOA development, but reserve the right to reconsider at a later date should consulting or interested parties request so.

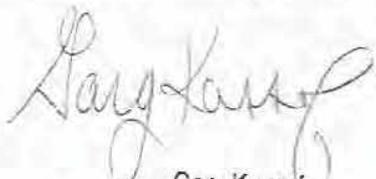
The following NJHPO staffs have been involved with the GBR EIS since the beginning of our on-going consultation effort with your agency:

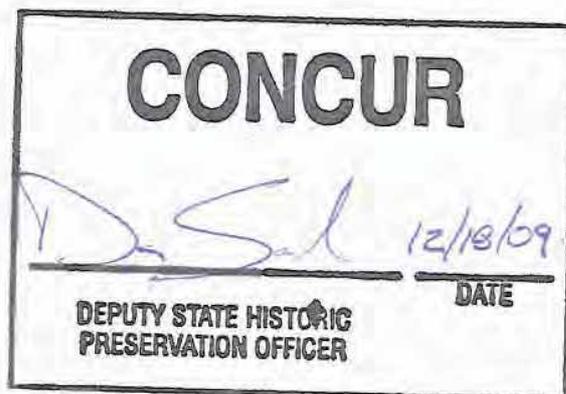
- Mike Gregg for issues and affairs on Archaeological Resources, and
- Andrea Tingey and Michelle Hughes for issues and affairs on Historic Resources.

As noted previously, the USCG 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 directly with your agency during this consultation. To that effect, please feel free to contact Deborah Van Steen at 973-407-1260 or Susan Grzybowski at 973-407-1266 with any questions or comments concerning the enclosed report. Otherwise, please call me at 212-668-7021.

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

Sincerely,


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



Enclosures:

- Expanded Statement of Significance for the Goethals Bridge.
- Updated List of Consulting and Interested Parties.
- ACHP Response Letter of June 2, 2009.

Copy:

Ruth L. Pierpont (NYSOPRIIP)
 James Warren (NYSOPRIIP)
 Andrea Tingey (NJHPO)
 Coleen Hopson (PANYNJ)
 Ken Hess (Berger/PB)

Judith Versenyi (Berger/PB)
 Kris Beadenkopf (Berger/PB)
 Susan Grzybowski (Berger/PB)
 Deborah Van Steen (Berger /PB)

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

16591/Goethals Bridge
January 15, 2010

Mr. Daniel Saunders
Acting Administrator and 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 (GBR)
Section 106 Consultation with NJHPO and NYSOPRHP:
(1) Proposed Preliminary Stipulations for the MOA – January 2009**

Dear Mr. Saunders:

Following the project initiation letter of June 17th, 2005 and under Section 106 consultation for the GBR EIS, the U.S. Coast Guard (USCG) is transmitting the enclosed *Goethals Bridge Replacement Preliminary Memorandum of Agreement Stipulations Options for the Mitigation of Adverse Effects* for your review and consultation. The Port Authority of New York and New Jersey is the project sponsor and the USCG is the lead federal agency for the preparation of the Goethals Bridge Replacement (or Proposed Project) EIS in accordance with National Environmental Policy Act (NEPA) of 1969.

Subsequent to USCG's determination of Adverse Effect on three historic architectural resources and NJHPO and NYSOPRHP's concurrence, a Memorandum of Agreement (MOA) will need to be prepared for the Proposed Project, pursuant to Section 106 Consultation (36 CFR 800.6). To that end, a pre-MOA Meeting was held with NJHPO and NYSOPRHP on April 20, 2009, and potential stipulations discussed. The enclosed *Preliminary MOA Stipulations Options* has been developed, incorporating suggestions made by the NJHPO. A meeting is requested on February 3rd or 4th, 2010 with the USCG, the Port Authority of New York and New Jersey, the NJHPO and the NYSOPRHP for review of the proposed stipulations submitted herein.

For your convenience, the following NJHPO staffs have been involved with the GBR EIS and MOA during our consultation effort with your agency:

- Mike Gregg - Archaeological Resource Issues, and
- Andrea Tingey - Historic Resources Issues

As noted previously, 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 directly with your agency during this

consultation. To that effect, please feel free to contact Deborah Van Steen at 973-407-1260 or Susan Grzybowski at 973-407-1266 directly 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. The U.S. Coast Guard looks forward to your continued involvement in the EIS and associated Section 106 Consultation Processes.

Sincerely,



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

Enclosures:

- *Preliminary MOA Stipulations Options (January 2009)*

Copy:

Ruth L. Pierpont (NYSOPRHP)
James Warren (NYSOPRHP)
Andrea Tingey (NJHPO)
Chris Bisignano (USCG)
Coleen Hopson (PANYNJ)

Ken Hess (Berger/PB)
Judith Versenyi (Berger/PB)
Kris Beadenkopf (Berger/PB)
Susan Grzybowski (Berger/PB)
Deborah Van Steen (Berger /PB)

National Historic Preservation Act - Section 106 Consultation
Coordination with NJHPO and NYSOPRHP
Goethals Bridge Replacement
Preliminary Memorandum of Agreement Stipulations Options
for the Mitigation of Adverse Effects

The Goethals Bridge Replacement Mitigation Strategy that is proposed is founded on Baseline Mitigations that are understood to be critical and essential to mitigation strategies for this type of project. From this Baseline, the strategy then builds on one Centerpiece Mitigation. Once the Centerpiece Mitigation is determined, lesson plans or computer based educational materials, and printed or published materials would be developed.

Most of the elements of the proposed strategy address those suggested by NJHPO at the April 20, 2009 meeting with both NYS and NJ Historic Preservation Offices. What is excluded from the strategy are those suggestions that covered other Port Authority Bridges, those suggestions are beyond the scope of the Goethals Bridge Replacement Project and are addressed on the last page of this document.

Baseline Mitigations

Port Authority Archives – Provide a mechanism for the archival care and management of Port Authority materials relating to the Goethals Bridge and methods of availability of the archival materials to appropriate repositories. To the extent that materials were not destroyed on 9/11, Goethals Bridge archival materials would include items such as photographs, drawings, and construction documents relating to the original construction and subsequent improvements to the bridge and toll plaza. Provision of a program for improved care and documentation of archival materials as well as digitizing materials, plans for housing original documents, and distribution of copies and/or original documents. Additionally, provision of a program to make materials available to publicly accessible institutions such as the New Jersey and New York State Archives.

Historic American Engineering Record (HAER) – Update and expand on the HAER documentation of the Goethals Bridge. The bridge was photographed for the HAER in 1991. The HAER documentation would include plans, historic photos, current images, and written history and description of the bridge. The documentation would draw primarily upon information available from a variety of existing sources, including those available from the Port Authority’s own records and files [Note that such documentation (especially the plans) would not be made publicly available until after the demolition of the existing structure due to security reasons.]

Companion Book to Darl Rastorfer Books on the George Washington and Bayonne Bridges –The Port Authority has produced publications on the George Washington Bridge (Darl Rastorfer, 2006) and the Bayonne Bridge (Darl Rastorfer, 2007). The Port Authority could commission a similar book for the Goethals Bridge.

Website Availability – Whatever the final mitigation determination, website application or availability would be applied as appropriate. At this time, it is anticipated that such information would be placed onto the Port Authority’s current website, and more specifically on the Goethals Bridge’s History webpage (<http://www.panynj.gov/bridges-tunnels/goethals-bridge-history.html>). However, additional websites may be suggested by the SHPOs.

Mitigation Centerpiece

The mitigation centerpiece would be designed around one significant endeavor, such as a documentary, or interpretive display, or artistic reinterpretation of the Goethals, perhaps using materials from the demolished bridge. Once the centerpiece is determined and its focus or theme established, then the materials and plans would be developed. Key to the development of the centerpiece subject is the determination of the target audience (i.e., would it be middle school students, the local community or other).

Topics for consideration in the mitigation centerpiece could cover a number of areas, such as: the history of the bridge; the influence and importance of the Goethals on the settlement and development patterns of the area, specifically Staten Island and the Cities of Elizabeth and Linden; and/or the demolition and building of a new Goethals Bridge.

Descriptions of possible centerpieces follow:

Documentary – Produce a documentary film for popular audience based on archival information of the construction of the Goethals Bridge, its operation, the demolition of the bridge, and the construction of the replacement structure. Make film available to networks such as public television (PPS and NJN), the Discovery Channel, and/or the History Channel.

Interpretive Display – Salvage and incorporate small, manageable sections of the Goethals Bridge (such as 3' to 4' sections of the lattice girders) to produce an interpretive display(s) that could combine photographic, artistic, and three-dimensional (salvaged) components illustrating the historic bridge and its construction. The displays could be placed in a public area, preferably within a Port Authority property. Should the Interpretive Display be chosen as the centerpiece mitigation, it would be a stationary exhibit and not a mobile exhibit. A possible placement could be incorporated into the design of the bicycle/pedestrian path on the new Goethals, or the lobby of the Port Authority's Goethals Bridge Administration Building.

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Materials Based on the Mitigation Centerpiece Selected

Lesson Plans – Once determination is made of the target audience, develop and provide lesson plans, including those satisfying NYS curriculum standards and/or the National Science Education Standards.

Publication/Printed Materials – Materials to be developed in support of the Mitigation Centerpiece selected and lesson plans.

SHPO Suggestions That are Not Considered Viable Mitigation Measures¹

At the April 20, 2009 meeting with NJHPO and NYS HPO, there were several mitigation suggestions posed by NJHPO that are not in the scope of the Goethals Bridge Replacement project. These suggestions broadened the view to include other Port Authority bridges.

1. ***Money for enhanced maintenance of Outerbridge Crossing*** – This suggests that the Port Authority does not maintain its bridges adequately. One of the reasons for the current replacement project is functional obsolescence and increasing maintenance costs of an aging structure, not deteriorating conditions. To that end the Port Authority maintains its bridges to the level of need. Furthermore, the Port Authority maintains its bridges until suitable alternatives are constructed.
2. ***Marketing / Relocation of the Goethals Bridge*** – It was agreed at the April 20th meeting that the Goethals Bridge is not suitable for relocation; however, pieces from the bridge could be salvaged (see Optional Interpretive Display above).
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4. ***National Register Nomination of Port Authority Bridges*** – Such option is not viable as the nominations of the Port Authority bridges to the National Register of Historic Places (NHRP) could become operational constraints to the Port Authority's long-term maintenance plans of those bridge structures.
5. ***Preservation Plan*** – The Port Authority already has developed long-term maintenance plans for its bridge structures. In turn, developing more stringent Preservation Plans for the maintenance of its historic bridges, such as the George Washington Bridge and Bayonne Bridge, in a manner keeping with the Secretary of the Interior's Standards would become operational constraints to the Port Authority. This is even more critical for the Bayonne Bridge, whose replacement feasibility is being investigated due to navigation clearance issues.

¹ At the 4/20/09 meeting, it should be noted that the SHPOs had already acknowledged and gave some sense of understanding that some of those stipulations would not be viable to the project.

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

16591/Goethals Bridge
January 15, 2010

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 (GBR)

Section 106 Consultation with NJHPO and NYSOPRHP:

(1) Proposed Preliminary Stipulations for the MOA – January 2009

Dear Ms. Pierpont:

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Subj: GOETHALS

16591

Susan Grzybowski at 973-407-1266 directly 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. The U.S. Coast Guard looks forward to your continued involvement in the EIS and associated Section 106 Consultation Processes.

Sincerely,



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

Enclosures:

- *Preliminary MOA Stipulations Options (January 2009)*

Copy:

Dan Saunders (NJHPO)
Andrea Tingey (NJHPO)
James Warren (NYSOPRHP)
Chris Bisignano (USCG)
Coleen Hopson (PANYNJ)

Ken Hess (Berger/PB)
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Memorandum

Subject: GOETHALS BRIDGE MOA MITIGATION MEETING Date: February 4, 2010
16591

From: Gary Kassof, USCG-Bridge Program Manager Reply to: dpb
Kassof
Attn. of: 212 668-7021

To:File

Attendees:

Andrea Tingey, Michelle Hughes, Jonathan Kinney (NJHPO)
James Warren (NYSOPRHP, by phone)
Gary Kassof (USCG)
Coleen Hopson (PANYNJ)
Stefan Armington (PANYNJ-URS)
Ken Hess, Deborah Van Steen (Berger/PB JV)

1. On 4 February 2010 I participated in subject meeting held at NJSHPO offices in Trenton to discuss MOA for Goethals Bridge replacement project. The meeting was very productive and culminated in concurrence by all parties on the way forward to finalize the Section 106 (NHPA) process. The agenda and attendance list are attached. (Jim Warren of NYSOPRHP participated via telephone).
2. After a short opening statement by the CG regarding the progress of the 106/MOA process and the desire for continued progress, the technical discussion began. The discussion was led by Deborah Van Steen of the JV's cultural resource team.
3. The following issues relating to the MOA draft mitigation measures were discussed:
 - a. BASELINE MITIGATION – It was agreed that the elements outlined in the draft mitigation plan will be accomplished. Coleen Hopson provided NJSHPO with copies of Darl Rastorfer's publications regarding the Bayonne and Geo. Washington Bridges. These publications were produced to commemorate those bridges' 75th anniversaries. It was agreed that a similar publication for the Goethals Bridge would be commissioned by the PANYNJ. The HAER documentation would be updated from the previous 1991 perspective primarily because the 1990's GBIP proposed a twinning of the existing bridge in lieu of its removal. The NJSHPO advised that MOA language in this regard should not be specific, but should require consultation with and deference to the National Park Service regarding the appropriate level and type of documentation.

- b. MITIGATION CENTERPIECE - It was agreed that the single significant endeavor that would satisfy this element of the MOA would be a documentary. This is the only one of the earlier recommended centerpiece endeavors that could satisfy this element on its own. Considerations for a documentary effort must be the target audience and the content. The documentary should be 24 -30 minutes in length, appeal to all age groups but should be comprehensible to a 4th grade class (school year that local history is included in NY and NJ school curriculum), and could cover a variety of topics such as history of bridge and technology, influence and importance of the GB on settlement and development of the area and demolition and construction of the replacement bridge. A lesson plan consistent with the NJ/NY state school curriculum standard should be developed and included. Andrea Tingey recommended coordination with NJDOT (Loreli Rappleye) since they have experience with development of documentaries. In addition, New Jersey Network (NJN) is a regional production company with experience with these type productions.
 - c. REVIEW OF BRIDGE DESIGN ELEMENTS – NJSHPO expressed a desire to review bridge design options such as shading of concrete or presentation of bridge lighting due to the fact that the project is located adjacent (or within?) the Arthur Kill RR Lift Bridge historic district. The SHPO wants the MOA to include this required consultation. They are not, however, seeking consultation on the larger design issues such as bridge type (e.g. cable stay vice tied arch). NYSHPO is not seeking consultation on design issues.
4. Identification of MOA signatories was discussed. The four signatories (USCG, NJSHPO, NYSHPO, PANYNJ) were confirmed. Inclusion of the FHWA (both NJ and NY divisions), a cooperating agency, was raised. It was pointed out that there was no federal funding for the project and FHWA interest is due to the bridge connection to federally financed and/or interstate roads. FHWA has not expressed an interest in being signatory to the MOA nor have they been involved or desire to be involved in bridge design. Michelle Hughes raised a possible parallel between the GBR and the Scudder Falls (I-95) Bridge replacement in which FHWA was the lead NEPA agency but not involved in funding (DRJTBC). After discussion it was agreed that these situations are not analogous. FHWA will be consulted on this point however.
5. Logistics and timing: (Dates are approximate) –
- a. 2/22 - refined MOA draft ready for internal (CG and PANYNJ) review
 - b. 3/15 - MOA ready for review by all the signatories.
 - c. 3/29 – circulation of MOA to consulting parties for 30 day review
 - d. 5/3 - commencement of MOA signing process (sequential)
6. Under this proposed scenario the four MOA originals could be signed by late May 2010, so as to be included in the FEIS which is scheduled for release in June 2010. A signed MOA is not required to be included in the FEIS although it must be executed by release of the ROD. Several factors may (and probably will) prevent this optimistic schedule.
- a. review time and required revisions
 - b. administrative “red tape” in procuring MOA signatures
 - c. legal review and briefings
 - d. military chain of command and control

U.S. Department of
Homeland Security

United States
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Commander
First Coast Guard District

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16591/Goethals Bridge
May 28, 2010

**Re: Goethals Bridge Replacement.
City of Elizabeth (Union County, NJ) and Staten Island (Richmond County, NY).
Section 106 Consultation with Consulting and Interested Parties:
(1) Draft Memorandum of Agreement – May 2010.**

TO WHOM IT MAY CONCERN:

Pursuant to Section 106 Consultation Process (36 CFR 800) of the National Historic Preservation Act, Federal agencies are required to take into account the effect of an undertaking on historic properties. In consultation with the New Jersey Historic Preservation Office (NJHPO) and the New York State Office of Parks Recreation and Historic Preservation (NYSOPRHP), the U.S Coast Guard (USCG), an agency within the Department of Homeland Security (DHS), has determined that the Goethals Bridge Replacement (GBR) Project would have an adverse effect on three historic properties that are eligible for listing on the National Register of Historic Places (i.e., the Goethals Bridge, the Staten Island Railway Lift Truss Bridge over the Arthur Kill, and the Staten Island Railroad Historic District). As a result, a Memorandum of Agreement (MOA) among the USCG, the NJHPO, the NYSOPRHP, and The Port Authority of New York and New Jersey (PANYNJ), the project sponsor has been drafted for the mitigation of such adverse effects to historic properties from the GBR Project.

As part of the Section 106 consultation and pursuant to 36 CFR 800.2(d) and 800.6(a), the draft MOA is herein attached for review and comment by all Consulting and Interested Parties (as listed in Attachment 3 of the MOA). **Written comments will be received for a period of thirty (30) calendar days; that is no later than July 1st, 2010.** In addition, this draft MOA is also available online at <http://www.goethalseis.com/> for public comment. Following the 30-day review period and upon consideration of all relevant comments received, the MOA will be finalized and executed by the four signatories (i.e., the USCG, NJHPO, NYSOPRHP, and PANYNJ).

As noted in the stipulations of the draft MOA, should an alignment other than the New Alignment South be identified as the Environmentally Preferred Alternative, the USCG shall provide formal notification to the signatories to reopen consultation with regard to the identification of historic properties and mitigation of additional adverse effects.

Please direct any written comments to Gary Kassof, by email to gary.kassof@uscg.mil, or by fax to 212-668-7967. Written comments can also be mailed or hand-delivered to the First Coast Guard District Bridge Office located at One South Street, Battery Park Building, New York, NY 10004. Visiting hours are between 9:00 a.m. and 3:30 p.m., Monday through Friday, except Federal holidays.

Thank you for your assistance in this undertaking. The USCG 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:

- *Draft Memorandum of Agreement (May 2010)*

Copy:

James Warren, Douglas Mackey (NYSOPRHP)
Andrea Tingey, Michelle Hughes (NJHPO)
Chris Bisignano, Shelly Sugarman, Allen Garneau (USCG)
Coleen Hopson, Jim Blackmore, Stefan Armington (PANYNJ)
Ken Hess, Judith Versenyi, JP Magron, Susan Grzybowski, Deborah Van Steen, Kris Beadenkopf (Berger/PB)