



OHIO DEPARTMENT OF TRANSPORTATION

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OFFICE OF ENVIRONMENTAL SERVICES

Ms. Laurie Leffler, Division Administrator
Federal Highway Administration
200 North High Street
Columbus, Ohio 43215

May 14, 2014

Attn: Matt Shamis, Division Bridge Engineer

Subject: August 19, 2013 through May 14, 2014 Compliance Review Appendix C

Re: *Appendix C of the Programmatic Agreement Among the Federal Highway Administration, The Advisory Council on Historic Preservation, The State Historic Preservation Office and The State of Ohio Department of Transportation Regarding Implementation of The Federal-Aid Transportation Program in Ohio (Agreement No. 16734) executed November 29, 2011.*

Dear Ms. Leffler:

This letter documents ODOT's compliance tasks that have taken place under the above-referenced agreement from August 2013 to May 2014. Attached for your records is the report entitled *August 2013 to May 2014 Compliance Review Appendix C* which contains documentation of actions completed under each stipulation of the *Section 106 Programmatic Agreement (Agreement No. 16734)*.

A Section 106 Programmatic review meeting has been scheduled for June 3, 2014 at the Ohio Historical Society Museum, SHPO Conference Room, 800 E. 17th St., Columbus, Ohio. Subsequent to the meeting and any pending revisions to the annual report, we request that FHWA, Ohio Division, please forward the appropriate documentation to the FHWA Headquarters & Resource Center. The PA reviewers include: Matt Shamis, Division Bridge Engineer, FHWA, Ohio Division; Mark Epstein, Department Head, Resource Protection and Review, State Historic Preservation Office; Erica Schneider, Assistant Environmental Administrator, ODOT Office of Environmental Services; Nancy Campbell, History/Architecture Reviews Manager, State Historic Preservation Office; Thomas Grooms, Archaeology Reviews Manager, State Historic Preservation Office; Susan Gasbarro, History/Architecture Team Leader, ODOT Office of Environmental Services; Stanley Baker, Archaeology, Team Leader, ODOT Office of Environmental Services; and Thomas P. Barrett, Environmental Specialist, ODOT Office of Environmental Services. Prior to last year's meeting, a copy of the annual report from June 2011 to July 2013 was posted as a website and made available electronically. The website is still active.

This year, marks the second Compliance Review since the previous historic bridge agreement (Agreement No. 10978) was superseded by the *Section 106 Programmatic Agreement* on November 29, 2011. Actions completed which adhere to stipulations of Appendix C of the Section 106 PA during the last ten months are referenced heretofore.

Stipulation 1

Historic bridges (i.e., bridges eligible for listed in or eligible for listing in the NRHP) are subject to the Section 106 Consultation Process when part of a federal undertaking or approval, except for items listed in Appendix B of the agreement. FHWA and ODOT ensure that through ODOT's Project Development Process (PDP), all feasible and prudent alternatives are explored in the project scoping phase of a historic bridge undertaking. Rehabilitation is the preferred alternative until proven infeasible or not a prudent use of public funding. Rehabilitation for vehicular use is thoroughly evaluated before other alternatives are considered. When rehabilitation is not feasible and prudent, bypassing it with an agreement to maintain the bridge, or relocation for adaptive use is then considered, following AASHTO's *Guidelines for Historic Bridge Rehabilitation and Replacement* (2008) and ODOT's *Ohio Historic Bridge Maintenance and Preservation Guidance* (2010).

The SHPO and all consulting parties are copied on each no adverse effect finding with the appropriate documentation as it is made by ODOT-OES, in accordance with Stipulation 4C of the Agreement.

For undertakings that includes NRHP-listed or Eligible bridges that will or may be adversely affected by the undertaking, as defined by the Criteria of Adverse Effect set forth in 36 CFR § 800.5(a), ODOT-OES makes a formal finding of "adverse effect" and notifies SHPO via formal consultation letter, in accordance with Stipulation 4C of the Agreement. ODOT-OES consults with SHPO, FHWA, and the ACHP (if participating in consultation), and consulting parties on measures to avoid, minimize, or mitigate the adverse effect.

Stipulation 2

ODOT-OES Cultural Resources staff maintains the *Ohio-DOT Historic Bridge Inventory Database* (originated in 1981 and frequently updated). A copy of the database is forwarded to SHPO and FHWA on a semiannual basis at minimum. It is also available through ODOT's public website. The database is shared with ODOT's IT department and Office of Structural Engineering for inclusion in NBIS, BMS and ODOT's buckeyeassets.org website; on a semiannual schedule.

May 14, 2014

It is anticipated that the new Structural Management System (SMS) which will be going live on May 15, 2014, will allow delivery of the historic bridge information in real-time, eventually serve as the primary source for the Ohio DOT Historic Bridge Inventory Database information. Previously, there were 483 historic bridges in 2009, 494 total historic bridges in 2010, and 506 in 2013. The inventory currently indicates that there are about 500 total historic bridges in the state in the following two categories:

122 bridges listed in the National Register of Historic Places (120 bridges were recorded in the 2010 bridge update)

378 bridges are inventoried as Eligible for the NRHP (386 bridges were recorded in the 2010 bridge update)

7504 bridges constructed prior to 1961 have been evaluated as Not Eligible for the NRHP and largely considered exempt from Section 106 coordination, in accordance with the Agreement. However, there are instances where new data or research presents information that necessitates reevaluation of a structure, through consultation with SHPO.

Stipulation 3

Surveys to identify significant bridges that meet or are approaching the 50 year threshold for NRHP consideration, will be completed at the discretion of the signatories of this agreement.

Having completed the 2004 bridge study which included bridges constructed 1951-1960 and a fairly recent update in 2010 which covered previously excluded types built prior to 1950; it is ODOT's preference to continue managing historic bridges using the existing agreement in lieu of the *Program Comment* (issued by the ACHP on November 2, 2012) for *Streamlining Section 106 Review for Actions Affecting Post-1945 Concrete and Steel Bridges*.

Stipulation 4

Non-programmed bridges determined or recommended Eligible for NRHP based on new information or preservation interest, in accordance with Stipulation 4 of the Agreement.

HUR-Ridge Road Stone Arch (TR 114) SFN 3937178. SHPO concurrence March 7, 2014

ATB-Clyde Hill Bridge SFN: 0432474 Morse Designed truss. SHPO concurrence NRHP eligibility May 9, 2014

MAH-Lowellville Steel Tied Arch SFN: 5052149. SHPO letter May 8, 2014, does not concur with NRHP eligibility for less than 50 year old property.

CUY-222nd Rigid Frame recommended by Dr. Gasparini on April 28, 2014.
Pending SHPO consultation.

GAL-Teens Run District 10 early Integral Abutment design (recommended by Marty Burke in 1991). Pending SHPO and District 10 Planning consultation.

LOG-Columbus St. West Liberty skewed, 1879, pony truss over RR spur, Ohio Bridge and Iron Works (new discovery from Chris Weiss formerly OSE Local Bridges). Pending SHPO consultation. ODOT-OES conducted field inspection with ODOT engineering staff on April 10, 2014 and met with West Liberty officials on preservation options.

MIA-Owens Road Bridge SFN: 5533260 circa 1885 Smith Bridge design (OHBA/historicbridges.org recommended via email 2/28/13) SHPO concurrence letter pending.

Stipulation 5

ODOT-OES staff continues to use the individual Management Plans whenever a Management Plan bridge is part of a federal undertaking for Section 106 and 4(f) evaluations. They are also used as a general planning and scoping tool for the 36 structures that have them, with some notable successes, helping to guide the ODOT's restoration of the STA-172 concrete arch and Preble County's adaptive reuse of the Uts Road Sherman pony truss for example.

The Management Plans and their summary report are posted on ODOT's Cultural Resources website:

http://www.dot.state.oh.us/Divisions/Planning/Environment/Cultural_Resources/HISTORIC_BRIDGES/Documents/2013HistoricBridgeMgmtPlans.pdf

Stipulation 6

OES staff members continue to promote routine maintenance, proper treatments of materials, and rehabilitation and reuse, of historic bridges based on guidance established by AASHTO, the National Park Service (NPS), and ODOT's *Ohio Historic Bridge Maintenance and Preservation Guidance*, and recommendations outlined in ODOT's Historic Bridge Management Plans.

Stipulation 7

ODOT routinely offers guidance through the use of ODOT's *Ohio Historic Bridge Maintenance and Preservation Guidance* for undertakings affecting historic types of bridges, even if they are not considered eligible for, or listed on the NRHP.

For example, seven non-eligible Pratt pin-connected pony trusses have been identified by OES and ODOT's Office of Structural Engineering for a salvage plan in Morrow County as part of the Ohio Bridge Partnership Program under PIDs 97618 and 97623. The pony trusses will be relocated and made available for adapted reuse. The two thru truss structures included in this undertaking, were not considered good candidates for the salvage plan under the statewide design-build bridge replacement program.

Stipulation 8

ODOT routinely maintains and updates the *Cultural Resources Historic Bridges Available for Reuse* website that advertises bridges and salvaged bridge components for reuse on roads, multiuse trails, parks, or other applications that will preserve and maintain them. So far this year, there has been notable interest from parties in Ohio, Iowa, Colorado (Crawford County pony truss), and Minnesota (Pickaway County pony truss).

Stipulation 9

ODOT makes a continuous effort to identify and reach out to parties that may have an interest in reusing historic bridges e.g. state and local parks, golf courses, multipurpose trails, and municipal and regional planners. Information on the Cultural website provides sources of funding and structures that are currently available for reuse.

OES staff members are active in the Transportation Research Board's National Cooperative Highway Research Program (NCHRP 25-25) *Task 88 Transferring Ownership of Historic Bridges: Approaches and Challenges*. The project's kickoff was initiated on July 17, 2013 and the report findings will be available in July 2014.

Stipulation 10

When ODOT or SHPO are notified of a bridge owner's intent to replace a historic bridge using local government funds and no federal approvals are required, ODOT and SHPO will encourage rehabilitation in accordance with numbers 6 and 12 of Appendix C, and AASHTO's guidelines, which encourage the use of design exceptions, where applicable; or encourage relocation and/or reuse of the structure if it's not feasible to remain in place. ODOT may offer to advertise the bridge for reuse on its website and recommend documentation before a structure is demolished.

ODOT-OES recently recommended ODOT District 11 market the US 36 Parker Thru Truss Bridge for reuse and or preservation, as part of a planned replacement using state funds. Other recommendations may be added as the project advances, to document the structure prior to any removal or demolition efforts.

Stipulation 11

ODOT and FHWA continue to explore opportunities to incorporate sustainable practices in bridge design, through the reuse of existing bridges, structural elements and materials. Since 2011, sustainable design and context-sensitive reuse have been eligible Historic Bridge Award categories. See the example given in Stipulation 7.

Stipulation 12

On August 14, 2013, ODOT presented two Ohio Historic Bridge Awards at the County Engineers Association of Ohio, Bridge Conference and Trade Show in Columbus. One award went to Huron County for the Standardsburg Road Bridge Warren thru truss rehabilitation, and the second went to Monroe County for rehabilitation of the Jericho concrete open spandrel arch.

Ms. Leffler
August 2013-May2014 Compliance Review of Appendix C

May 14, 2014

Stipulation 13

ODOT-OES works in partnership with ODOT's Office of Local Programs to facilitate the Transportation Alternative Program (TAP), Municipal Bridge, and Credit Bridge Program.

Stipulation 14

The Federal Highway Administration, State Historic Preservation Office, Ohio Historic Bridge Association, and the Ohio Department of Transportation have identified approximately 100 Covered Bridges, open to traffic, which could potentially benefit from a federally-sponsored initiative to install fire protection, lighting, and surveillance equipment. The objective of this initiative is to protect Ohio's National Register of Historic Places (listed and eligible for listing) covered bridges, important transportation heritage and tourism resources, from fire damage and vandalism. At FHWA's request, ODOT has developed a dedicated website to the Ohio Covered Bridge Protection Program at the following link:

[http://www.dot.state.oh.us/Divisions/Planning/Environment/Cultural Resources/HISTORIC BRIDGES/Pages/Covered-Bridge-Protection.aspx](http://www.dot.state.oh.us/Divisions/Planning/Environment/Cultural_Resources/HISTORIC_BRIDGES/Pages/Covered-Bridge-Protection.aspx)

ODOT is in the process of identifying a funding source to initiate the program.

Stipulation 15

ODOT-OES staff continues to share data and promote the Ohio-DOT Historic Bridge Inventory's research findings, program objectives, and publicize Ohio's bridge engineering heritage. Examples of OES staff members' recent activities under this Stipulation included some of the following public outreach and presentation opportunities:

ODOT-OES staff participated an interview on October 18, 2013 with Marie Venner, for NCHRP 25-25 Task 88 *Transferring Ownership of Historic Bridges: Approaches and Challenges Technical Memorandum, Task 3: Summary of Interviews and Considerations for Recommendations* published February 28, 2014

In December 2013, ODOT-OES staff contacted the development team of Google's Field Trip smartphone application, to add the historic bridge data to the travel app. ODOT-OES will notify FHWA and SHPO on future updates on this endeavor.

Stipulation 16.

ODOT-OES continually updates the counties, municipalities, historical societies and other entities about the historic status of structures within their respective areas.

Ms. Leffler
August 2013-May2014 Compliance Review of Appendix C

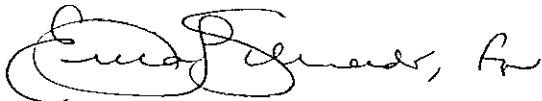
May 14, 2014

Stipulation 17.

In addition to the enclosed report, the current historic bridge inventory spreadsheet has been updated on the ODOT-OES website and a copy of the Access database is being forwarded electronically to FHWA and SHPO with this letter through ODOT's ftp service. It is anticipated that SHPO and FHWA will have access to the historic bridge database through ODOT's Structure Management System by September 2014.

If you have any questions or comments, please contact Thomas P. Barrett, Staff Historian, Office of Environmental Services, at 614-466-3932 or tom.barrett@dot.stat.oh.us.

Respectfully,



Timothy M. Hill
Administrator
Office of Environmental Services

TMH: tpb

Enclosure

c: M. Epstein, OSHPO; Noel Mehlo, FHWA; File, w/att.; OES Bridge PA file/electronic files

