



Office of
ENVIRONMENTAL
SERVICES
INDOT




**Choosing the Select:
The Results of the
Indiana Historic Bridge Inventory**





Road School 2010



Definitions

- Historic bridge:
A bridge that is listed in, or eligible for listing in, the National Register of Historic Places.
- National Register of Historic Places:
The official inventory of districts, sites, buildings, structures and objects significant in American history, architecture, archaeology and culture, which is maintained by the Secretary of the Interior...

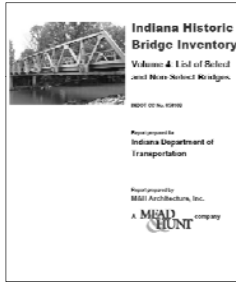
Definitions

- **Select** historic bridges are those most suitable for preservation that are excellent examples of a given type of historic bridge.
- **Non-select** historic bridges are those bridges that are not considered excellent examples of a given type of historic bridges and are not suitable candidates for preservation.



Results

- Volume 4 - List of Select and Non-Select Bridges
- <http://www.in.gov/indot/2743.htm>





Results

- Volume 4 - List of Select and Non-Select Bridges <http://www.in.gov/indot/2743.htm>





Results

- 5,313 bridges subject to analysis
- 4,512 non-historic bridges
- 801 historic bridges
- 718 historic bridges subjected to Select/Non-Select Methodology

Results


- 439 -- Select Bridges
- 279 -- Non-Select Bridges
 - 34 – Recommended Select pending
 - an exception to the Low Volume Standard

**Historic Bridge
Project Development Process (PDP)**



- Draft guidance developed by FHWA and INDOT
- Available today & on INDOT website:
 - <http://www.in.gov/indot/2743.htm>

Comment period until March 23





Historic Bridge PDP

- Overview:
 - Initiate Early Coordination and Seek Consulting Party Comment
 - Market Bridge for Re-Use, if Applicable
 - Identify Preferred Alternative
 - Hold Public Hearing
 - CE/4(f) Approval





Historic Bridge PDP

- Initiate Early Coordination and Seek Consulting Party Comment
 - Issue early coordination letter
 - "Bridge Project – Scope Undetermined"



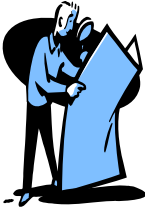

Historic Bridge PDP

- Initiate Early Coordination and Seek Consulting Party Comment
 - Seek feedback on the following items:
 - Area of Potential Effect (APE)
 - Historic properties report (HPR)
 - Purpose & need (P&N)
 - Section 4(f) alternatives analysis





Historic Bridge PDP

- Section 4(f) alternatives analysis:
 - Rehabilitation for Continued Vehicular Use (two-way and one-way options)
 - Bypass (non-vehicular use)
 - Relocate (non-vehicular use)
 - Replacement



Historic Bridge PDP

- Section 4(f) alternatives analysis:
 - Rehabilitation for Continued Vehicular Use (two-way and one-way options)
 - Feasible
 - Minimum design standards in the INDOT Design Manual can be addressed. - OR -
 - Design exception approved for continued vehicular use for bridges listed in Chapter 5, Volume 4.



Historic Bridge PDP

- Section 4(f) alternatives analysis:
 - Rehabilitation for Continued Vehicular Use (two-way and one-way options)
 - Prudent – Select Bridges
 - Initial rehabilitation cost < 80% of the replacement cost = rehabilitation is warranted.
 - Initial rehabilitation cost is ≥ 80% of the replacement cost = owner may request further consultation with FHWA to determine rehabilitation eligibility.



Historic Bridge PDP

- Section 4(f) alternatives analysis:
 - Rehabilitation for Continued Vehicular Use (two-way and one-way options)
 - Prudent – Non-Select Bridges
 - Replacement is warranted if:
 - Initial rehabilitation cost is \geq 40% of the replacement cost
 - The bridge meets any two of the following criteria that cannot be economically corrected:
 - Waterway opening is inadequate
 - Documented history of catching debris due to inadequate freeboard or due to piers in the stream
 - Requires special inspection procedures
 - Classified as scour-critical
 - Fatigue analysis indicates fatigue-prone welded details near end of their service lives
 - Sufficiency Rating < 35


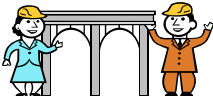
Historic Bridge PDP

- Section 4(f) alternatives analysis:
 - Bypass (non-vehicular use)
 - Select – Owner is responsible for rehabilitation costs.
 - Non-Select – Responsible party other than owner must come forward to fund preservation/maintenance.



Historic Bridge PDP

- Section 4(f) alternatives analysis:
 - Relocate (non-vehicular use)
 - Select – Owner is responsible for associated costs.
 - Non-Select – Responsible party other than owner must come forward to fund preservation/maintenance.




Historic Bridge PDP

- Section 4(f) alternatives analysis:
 - Replacement
 - Select – Owner must rehabilitate historic bridge at alternate location.
 - Non-Select – Demolition is prudent if responsible party does not come forward to assume ownership.



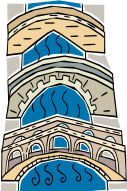

Historic Bridge PDP

- Note regarding funding :
 - Non-vehicular rehabilitation: BR funds available for up to the cost of demolition of the bridge
 - STP/TE funds: eligible for historic preservation projects
 - Priority will be given to Select Bridges




Historic Bridge Marketing

- Select Bridges
 - Optional for exploring relocation when vehicular use is not feasible & prudent
- Non-Select Bridges
 - Required for all
 - Even concrete & stone



Historic Bridge Marketing

- Provisions per the PA
- Legal notice in a local newspaper
- Signs at both approaches to the historic bridge



Historic Bridge Marketing

- Provisions per the PA
- INDOT's historic bridge marketing website
 - <http://www.in.gov/indot/2967.htm>
- Historic Landmarks Foundation of IN's website
 - <http://www.historiclandmarks.org/FORSALE/Pages/default.aspx>



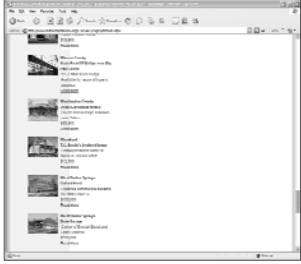

Historic Bridge Marketing

- INDOT's historic bridge marketing website
 - <http://www.in.gov/indot/2967.htm>





Historic Bridge Marketing

- Historic Landmarks Foundation of IN's website
 - <http://www.historiclandmarks.org/FORSALE/Pages/default.aspx>



Identify Preferred Alternative

- Consulting parties meeting, if needed
 - Address questions & concerns
- Rehabilitation details
 - To determine effect
- Section 106 800.11(e) documentation
 - Include updated P&N and 4(f) alternatives analysis



Identify Preferred Alternative

- Approval of 800.11(e) documentation
 - No adverse effect = INDOT
 - Adverse effect = FHWA
- SHPO approval of preferred alternative for Select Bridges
- Draft MOA for impacts to resources other than bridge



Public Hearing

- Cannot be held until AFTER:
 - 6-month marketing period has expired
 - FHWA has concurred with 800.11(e) documentation and associated preferred alternative
 - SHPO has concurred with 800.11(e) documentation and associated preferred alternative for Select bridges
 - INDOT has released CE for public review and comment





Public Hearing

- Hearing notice should indicate:
 - Opportunity for the public to comment on CE and 800.11(e) documentation
 - Last opportunity for a responsible party to step forward to obtain bridge
 - Opportunity for comment on effects of project on other historic properties
- Owner will notify consulting parties about hearing by letter or e-mail



CE/4(f) Approval

- Occurs after public hearing comment period has expired
- CE updated appropriately
- INDOT must assure:
 - CE has NEPA clearance for new location of relocated bridges
 - Commitments Summary Form contains proper provisions
- Final approval:
 - FHWA when Section 4(f) use occurs
 - INDOT when no Section 4(f) use



Standard Treatment Approach for Historic Bridges

- From Attachment B of the Historic Bridge PA
- Must be listed specifically in CE Commitments Summary Form if not implemented before NEPA approval



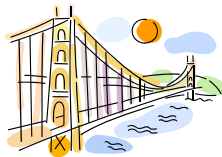
Standard Treatment Approach for Historic Bridges

- Rehabilitation (Select or Non-Select Bridges):
 - Follow Secretary of the Interior's Standards for Rehabilitation:
<http://www.nps.gov/history/hps/tps/standards/rehabilitation.htm>
 - Provide plans to SHPO at approximately 30% complete, 60% complete, and final design



Standard Treatment Approach for Historic Bridges

- Rehabilitation (Select or Non-Select Bridges):
 - SHPO has 30 day comment period
 - SHPO comments must be addressed



Standard Treatment Approach for Historic Bridges

- Rehabilitation (Select or Non-Select Bridges):
 - Bridge must be maintained for 25 years
 - Seek continued National Register listing, when applicable

NATIONAL REGISTER OF HISTORIC PLACES
the official list of the Nation's historic places worthy of preservation



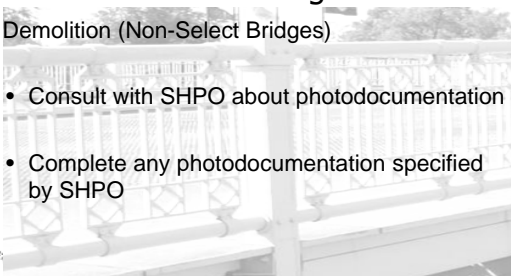
Standard Treatment Approach for Historic Bridges

- Rehabilitation (Select or Non-Select Bridges):
 - Complete any photodocumentation specified by SHPO
 - All of above must be implemented before INDOT requests construction authorization



Standard Treatment Approach for Historic Bridges

- Demolition (Non-Select Bridges)
 - Consult with SHPO about photodocumentation
 - Complete any photodocumentation specified by SHPO



Standard Treatment Approach for Historic Bridges

- Demolition (Non-Select Bridges)
 - Photodocumentation must be implemented before INDOT requests construction authorization
 - Salvage bridge elements if interested party was identified during bridge marketing



Frequently Asked Questions

Q: Why is a historic property report required?

A: Other resources could be in area. Consistency.

Q: Why market bridges that can't be relocated?

A: Someone may step forward willing to preserve such a bridge at its existing location.



Frequently Asked Questions

Q: Are Memorandums of Agreement (MOAs) needed now?

A: Not if the only adverse effect is to the historic bridge.

Q: Can a Non-Select bridge be preserved?


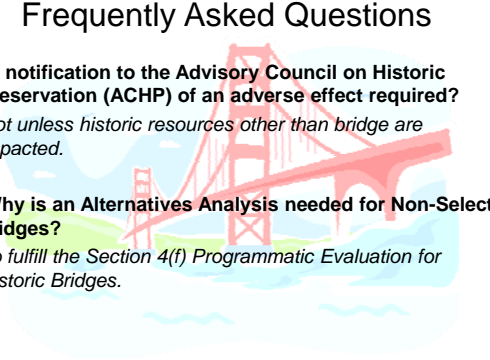
A: Yes, if Alternatives Analysis deems it prudent and feasible.



Frequently Asked Questions

Q: Is notification to the Advisory Council on Historic Preservation (ACHP) of an adverse effect required?
A: Not unless historic resources other than bridge are impacted.



Q: Why is an Alternatives Analysis needed for Non-Select bridges?
A: To fulfill the Section 4(f) Programmatic Evaluation for Historic Bridges.

Frequently Asked Questions

Q: How is the process streamlined for Non-Select Bridges being replaced?
A: Process takes less time & money because no MOA required and mitigation is known up front.


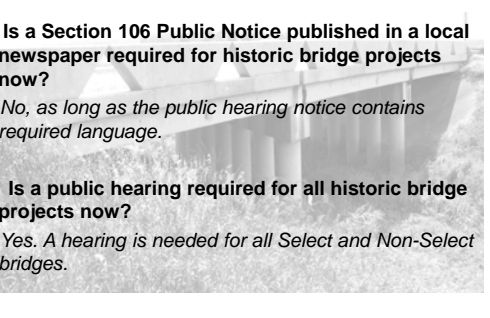
Q: Is an Adverse Effect rehabilitation allowable?
A: Yes. Section 4(f) alternatives discussion should discuss why needed.

Frequently Asked Questions



Q: Is a Section 106 Public Notice published in a local newspaper required for historic bridge projects now?
A: No, as long as the public hearing notice contains required language.

Q: Is a public hearing required for all historic bridge projects now?
A: Yes. A hearing is needed for all Select and Non-Select bridges.

Historic Bridge Project Development Process (PDP)

- Document available on INDOT website:
 - <http://www.in.gov/indot/2743.htm>
- Comment period until March 23
- Comments to Mary Kennedy
 - mkennedy@indot.in.gov



Questions

- **INDOT**
 - Mary Kennedy (317) 232-5215
mkennedy@indot.in.gov
 - Staffan Peterson (317) 232-5161
stpeter@indot.in.gov
- **FHWA**
 - Larry Heil (317) 226-7480
Larry.Heil@dot.gov
 - Janice Osadczuk (317) 226-7486
Janice.Osadczuk@dot.gov



Initiate Early Coordination and Seek Consulting Party Comment

- Issue early coordination letter. Letter should contain, at a minimum, the following information:
 - Project Designation Number
 - Route Number
 - Project Description
 - Feature crossed
 - Township
 - City
 - County
- When referencing the project, the classification (i.e., replacement or rehabilitation) should not yet be stated. Per the [Historic Bridge PA](#), INDOT will classify and label all historic bridge projects as “Bridge Project – Scope Undetermined” until after FHWA has identified a preferred alternative for the project. This generic classification for bridge projects will ensure that federal-aid applicants and the public do not have false expectations that the bridge will be replaced before the NEPA process is completed.
- Invite consulting parties and seek feedback on the following items:
 - Area of Potential Effect (APE). See [Cultural Resources Manual](#) for guidance on developing an APE.
 - Historic properties report (HPR). See [Cultural Resources Manual](#) for guidance on which type of HPR to prepare.
 - Purpose & need (P&N). See [Procedural Manual for Environmental Studies](#) for guidance on developing a purpose and need statement.
 - Section 4(f) alternatives analysis (the draft 4(f) alternatives analysis must be submitted to INDOT-OES for review and concurrence prior to distribution).
- The 4(f) alternatives analysis must address the following alternatives for both Select and Non-Select Bridges (Select Bridges must be preserved as part of the project):
 1. Rehabilitation for Continued Vehicular Use (two-way and one-way options)
 - a. Feasible:
 - i. If the minimum design standards in the [INDOT Design Manual Section 72](#) can be addressed, or
 - ii. If INDOT approves a design exception for continued vehicular use for the Select bridges that require a design exception, which are listed in Chapter 5, Volume 4 (List of Select and Non-Select Bridges) of the Historic Bridge Inventory.
 - b. Prudent:
 - i. Select Bridge – If the initial rehabilitation cost is less than 80% of the replacement cost, rehabilitation is warranted; or if the initial rehabilitation cost is equal to or greater than 80% of the replacement cost, the owner may request further consultation with FHWA to determine rehabilitation eligibility. A Select bridge may be rehabilitated and left in place, and a new bridge and new approaches may be built adjacent to it. This effectively creates one bridge and approaches for each direction of travel. For this situation, the new

bridge must meet all design standards for a new bridge. Where appropriate, the new 1-way bridge must be able to accommodate future widening to provide for 2-way travel.

- ii. Non-Select Bridge - If the initial rehabilitation cost is greater than or equal to 40% of the replacement cost, or the bridge meets any two of the following criteria that cannot be economically corrected as part of a rehabilitation project, then replacement is warranted:
 1. The bridge's waterway opening is inadequate (i.e., National Bridge Inventory Item 71 is rated 2 or 3).
 2. The bridge has a documented history of catching debris due to inadequate freeboard or due to piers in the stream.
 3. The bridge requires special inspection procedures (i.e., the first character of National Bridge Inventory Item 92A or 92C is Y).
 4. The bridge is classified as scour-critical (i.e., National Bridge Inventory Item 113 is rated 0, 1, 2, or 3).
 5. A fatigue analysis conducted in accordance with *Indiana Design Manual* Section 72-2.03(04) indicates the bridge has fatigue-prone welded details that are expected to reach the end of their service lives within the next 20 years.
 6. The bridge has a Sufficiency Rating of lower than 35.
2. Bypass (non-vehicular use)
 - a. Select – Owner is responsible for rehabilitation costs.**
 - b. Non-Select – Responsible party other than owner must come forward to fund preservation/maintenance for this to be a prudent alternative.**
3. Relocate (non-vehicular use)
 - a. Select – Owner responsible for associated costs.**
 - b. Non-Select – Responsible party other than owner must come forward to fund preservation/maintenance for this to be a prudent alternative.**
4. Replacement
 - a. Select – Owner must rehabilitate historic bridge at alternate location.**
 - b. Non-Select – Demolition is prudent if a responsible party does not come forward during the 6-month marketing period to assume ownership of the historic bridge and fund relocation, preservation, and maintenance.**

***Note regarding funding: When the preferred alternative for either a Select or Non-Select Bridge is non-vehicular rehabilitation, BR funds are available for the costs eligible as reimbursable associated with preserving the bridge. However, these funds are limited to the cost of demolition of the bridge. STP/TE funds are eligible for historic preservation projects. Priority will be given to Select Bridges.*

Market Bridge for Re-Use, if Applicable (can occur concurrent with above)

- Marketing is required when:
 - Select Bridges: optional if vehicular use does not appear to be feasible & prudent and owner wants to explore relocation options.

- Non-Select Bridges: all of them. Even bridges that cannot be relocated must be marketed. While it is unlikely, someone may step forward and be willing to preserve such a bridge at its existing location. The entity would have to assume the legal liability (i.e. a local group using the bridge for fishing pier, and being legally responsible for bridge preservation and associated liability), but if they were willing to do so, then they should have the opportunity to step forward and propose such an alternative.
- Marketing provisions from PA:
 - The bridge owner shall place a legal notice in a local newspaper and a statewide newspaper at a minimum six (6) months in advance of the public hearing to notify interested parties of the historic bridge availability for re-use. The advertisement should describe, at a minimum, the historic bridge length, width, height, condition, and availability.
 - The bridge owner shall place signs at both approaches to the historic bridge at a minimum six (6) months in advance of the public hearing to notify users that the historic bridge may be replaced and the contact for responsible party who wants to assume ownership of the bridge. The signs will remain in place until completion of NEPA.
 - The bridge owner shall provide INDOT-CRS with the information needed to post the historic bridge on INDOT's historic bridge marketing website and HLF's website, respectively. This information should be provided, at a minimum, six (6) months prior to the public hearing. Please contact INDOT-CRS for a blank form to submit bridge information. INDOT-CRS will post on the INDOT website and will forward the information to HLF to post on their website.

Identify Preferred Alternative

- INDOT, in consultation with SHPO, may request that a consulting parties meeting be scheduled to address questions and concerns with the draft 4(f) alternatives analysis.
- During consultation, sufficient details must be provided to determine effect for rehabilitation projects (i.e., listing specific structural members that will be replaced and/or providing percentage of replacement of the bridge's original material).
- Once INDOT is satisfied that substantive SHPO concerns have been addressed, the consultant should prepare the 800.11(e) documentation and include the updated P&N and 4(f) alternatives analysis.
- INDOT will review the 800.11(e) documentation and sign it if it involves a "no adverse effect" finding, or forward it to FHWA for signature if it involves an "adverse effect" finding. FHWA signature of the 800.11(e) "adverse effect" finding also constitutes FHWA concurrence in the **draft** P&N, 4(f) alternatives analysis, and preferred alternative. FHWA signature **does not** constitute **final** FHWA approval of the preferred alternative, but rather release of the 800.11(e) document and associated alternatives analysis for consulting party review and comment.
- If the project involves a Select Bridge, INDOT will seek SHPO concurrence with FHWA's preferred alternative. Additional information may need to be provided to SHPO during this review, to address specific questions regarding scope of the rehabilitation

and/or analysis of alternatives, before they are able to comment regarding the preferred alternative. The 800.11(e) documentation will need to be updated, approved, and redistributed to consulting party review and comment if the draft preferred alternative changes.

- If there is an adverse effect for historic resources other than the historic bridge, a draft MOA should be prepared to address non-bridge related adverse effects.

Hold Public Hearing

- The Public Hearing should not be scheduled until after the 6-month marketing period has expired and FHWA (and SHPO for Select bridges) has concurred with the 800.11(e) documentation and associated preferred alternative, and INDOT has initialed the CE for release for public review and comment. The public hearing will also serve as the opportunity for the public to comment on both the CE and the 800.11(e) documentation.
- The public hearing will be the last opportunity for a responsible party to step forward and provide the necessary sureties to obtain ownership, if continued vehicular use of a Non-Select bridge is not feasible and prudent, and the draft 4(f) alternatives analysis proposes demolition of a Non-Select Bridge.
- The public hearing notice should indicate that the hearing serves as the opportunity for the public to comment on both the CE and the 800.11(e) documentation, and serves as the last opportunity for a responsible party to step forward and take ownership of a Non-Select bridge. The documentation will be made available prior to and at the public hearing for public review and comment.
- If other historic properties are located within the project APE, the hearing notice should indicate that the hearing serves as the opportunity for comment on the effects of the project on those properties, thereby eliminating the need for a separate Section 106 Public Notice published in a local newspaper.
- The bridge owner will notify consulting parties by letter or e-mail (if available) of the public hearing and the availability of the environmental documentation.

CE/4(f) Approval

- Once the public hearing comment period has expired, the CE should be updated as appropriate (finalize 4(f) alternatives analysis/preferred alternative/Commitments Summary Form) and forwarded to INDOT for final review. INDOT must assure that:
 - Final CE provides NEPA clearance for the new location of a historic bridge, if the project involves relocation of a historic bridge.
 - Associated contracts/sureties should be in place and be specifically referenced in the CE Commitments Summary Form so FHWA can assure that all provisions of the Indiana Historic Bridge PA Standard Treatment Approaches for Historic Bridges have been fully incorporated into the final CE.
- Once FHWA has assured that all of the Historic Bridge Programmatic Agreement requirements have been fully addressed (and MOA provided to ACHP if there is an adverse effect to non-bridge related historic resources), FHWA will be in a position to grant final NEPA approval.

Draft Historic Bridge PA Project Development Process
February 24, 2010

- FHWA final approval of the CE will affirm that all Historic Bridge PA requirements have been fully addressed, serve to confirm that FHWA has concluded its responsibilities under Section 106, and serve as FHWA approval of the Historic Bridge Programmatic 4(f).
- FHWA has granted INDOT authority to sign “no adverse effect findings” and CEs that do not involve a 4(f) use. FHWA conducts Quality Assurance Reviews of these projects annually to assure the provisions of the respective Minor Projects PA and Categorical Exclusion PA are being properly implemented. INDOT will assure that all Historic Bridge PA stipulations not implemented at the time of NEPA approval and included in the Project Commitments Database (i.e. SHPO reviews at 30%, 60%, and Final Design if not already completed prior to NEPA approval). INDOT will also assure that all of commitments have been fully implemented prior to construction using the mitigation commitments tracking system. INDOT approval of the Environmental Consultation Form ([Design Memorandum No. 09-32 Technical Advisory](#), dated December 23, 2009) will assure all mitigation commitments have been fully implemented prior to construction.

Appendix 1

Standard Treatment Approach for Historic Bridges (Obtained from Attachment B of the [Historic Bridge PA](#))

Any of the following items that have not been implemented before NEPA approval, must be listed specifically in the CE Commitments Summary Form and fully incorporated into the final CE.

REHABILITATION

The following standard treatment approach applies to all Select Bridges and when the selected alternative includes preservation of a Non-Select Bridge¹:

1. The bridge owner will develop plans to rehabilitate the bridge in accordance with the [Secretary of the Interior's Standards for Rehabilitation](#), or as close to the Standards as is practicable.
2. The bridge owner will provide rehabilitation plans to the Indiana SHPO when the design is approximately 30% complete, 60% complete, and when final design plans are complete. If the project involves a bypass of the historic bridge, then the plan submittals will include a site plan and design of the new bridge and the historic bridge. The purpose of these reviews is to evaluate the design and proximity of the new bridge in relationship to the historic bridge (if historic bridge is bypassed), ensure compliance with the [Secretary of Interior's Standards for Rehabilitation](#), and to incorporate context sensitive design features, where practicable.
3. The Indiana SHPO will have thirty (30) days to review and provide comments to the bridge owner and notify them of any photo documentation requirements. If comments are not received within thirty (30) days, the bridge owner may assume agreement from the Indiana SHPO on the plans submitted.
4. The bridge owner will provide a written response to Indiana SHPO comments before the design is advanced to the next phase. The Indiana SHPO comments must be addressed.
5. The bridge owner will ensure that the historic bridge will be maintained for a minimum period of 25 years.
6. If the bridge is currently listed on the NRHP, then INDOT will seek approval of the Department of Interior to keep it on the Register.
7. The bridge owner will complete any photo documentation in accordance with the specifications provided by the Indiana SHPO.

¹ Applicable whether rehabilitated at existing location or relocated, whether rehabilitated for vehicular or non-vehicular use.

8. The bridge owner will ensure that the above requirements are implemented before INDOT requests construction authorization from FHWA.

9. If there is any disagreement between the Indiana SHPO and the bridge owner in carrying out this standard approach, then FHWA will consult with the Indiana SHPO and the bridge owner to resolve the disagreement. If the disagreement cannot be resolved by FHWA, then FHWA will comply with the dispute resolution stipulation of the Agreement.

DEMOLITION

The following standard treatment approach applies to Non-Select Bridges when the selected alternative includes demolition of the Non-Select Bridge:

1. The bridge owner will consult with the Indiana SHPO to determine if photo documentation of the bridge is needed. If needed, the Indiana SHPO will specify the photo documentation standards and distribution requirements. If the Indiana SHPO does not respond within thirty (30) days, the bridge owner may assume the Indiana SHPO does not require any photo documentation.

2. The bridge owner will complete any required photo documentation in accordance with the specifications provided by the Indiana SHPO.

3. The bridge owner will ensure that the above requirements are implemented before INDOT requests construction authorization from FHWA.

4. If there is any disagreement between the Indiana SHPO and the bridge owner in carrying out this standard approach, then FHWA will consult with the Indiana SHPO and the bridge owner to resolve the disagreement. If the disagreement cannot be resolved by FHWA, then the dispute resolution process identified in the Agreement will be followed.

5. Salvage of elements that may be stored and used for future repair of similar historic bridges, if a party was identified during the bridge marketing phase of project development (see Stipulation III.B.2).

Appendix 2

Frequently Asked Questions

Q: Why is a historic property report required for historic bridge projects when the bridge's National Register eligibility has already been established through the inventory results?

A: To ensure all FHWA-funded projects are consistent, an HPR is required for all projects that do not fall under the Minor Projects PA. Even though we know the eligibility of the bridge, other resources in the APE must be evaluated for National Register eligibility. If the bridge is the only resource in the APE or the only resources over 50 years of age that warrants at least a "contributing" rating, then a short HPR would be appropriate. Please see the [Cultural Resources Manual](#) for detailed guidance on what type of HPR is appropriate and the guidelines for preparing HPRs.

Q: Why do concrete and stone bridges have to be marketed for reuse when they can't be relocated?

A: While it is unlikely, someone may step forward and be willing to preserve such a bridge at its existing location. The entity would have to assume the legal liability (i.e. a local group using the bridge for fishing pier, and being legally responsible for bridge preservation and associated liability), but if they were willing to do so, then they should have the opportunity to step forward and propose such an alternative.

Q: Are Memorandums of Agreement (MOAs) needed for historic bridge projects now?

A: Not if the only adverse effect is to the historic bridge. The PA sets out the process for mitigating any adverse effects to the historic bridge. However, if an adverse effect will occur to another above-ground resource or an archaeological resource as a result of the bridge project, an MOA will be needed to mitigate the effects of the project on those resources.

Q: Is notification to the Advisory Council on Historic Preservation (ACHP) of an adverse effect on a historic bridge required under the PA?

A: No. Through signature of the PA, the ACHP agreed that implementation of the standard treatment approach includes all possible planning to minimize harm to the historic bridge and implementation of the standard treatment approach fulfills all consultation requirements under Section 106. However, if an adverse effect will occur to another above-ground resource or an archaeological resource as a result of the bridge project, the ACHP must be notified and the MOA to resolve that adverse effect must be filed with the ACHP.

Q: Why is an Alternatives Analysis needed for Non-Select bridges? Why can't they simply be demolished given their Non-Select status?

A: The PA was formulated to streamline the Section 106 process for historic bridges, but does not specifically address Section 4(f) requirements, although much of the analysis involved with the Non-Select determination can aid in fulfilling the Section 4(f) requirements. A Section 4(f) Alternatives Analysis is required to fulfill the Section 4(f) Programmatic Evaluation for Historic Bridges.

Q: How is the process streamlined for Non-Select Bridges for which the alternatives analysis determines will be replaced? It seems like a lot of work is still involved to replace these bridges.

A: If the only adverse effect is to the historic bridge, a Memorandum of Agreement (MOA) will not be required for the “adverse effect” involved with demolishing the bridge. The PA sets out the process for mitigating any adverse effects to the historic bridge. Time and money are saved by not undergoing the MOA process.

Time and money will also be saved in the amount of mitigation that is specified in the PA. Dismantling bridges for storage and potential reuse is currently a common mitigation practice. It will no longer be required per the PA. Per Attachment B of the Historic Bridge PA (Standard Treatment Approach for Historic Bridges), only two points of mitigation are required:

- The bridge owner will consult with the Indiana SHPO to determine if photodocumentation of the bridge is needed. If needed, the Indiana SHPO will specify the photo documentation standards and distribution requirements. If the Indiana SHPO does not respond within thirty (30) days, the bridge owner may assume the Indiana SHPO does not require any photo documentation.
- The bridge owner will salvage elements that may be stored and used for future repair of similar historic bridges, if a party was identified during the bridge marketing phase of project development (see Stipulation III.B.2).

Q: Can a Non-Select bridge be preserved?

A: Yes, the results of the Purpose and Need development and Alternatives Analysis might conclude that rehabilitation of a Non-Select bridge is prudent and feasible, and therefore, is the preferred alternative for a Non-Select bridge.

Q: If a Select bridge is rehabilitated, but the rehabilitation work cannot follow the Secretary of the Interior’s Standards and the result is determined an adverse effect, is that allowable in the PA?

A: Yes, it is allowable. Section 106 for all Federal-aid projects involving bridges on the Select/Non-Select list will follow the provisions of the PA, regardless of whether the project ultimately does or does not result in an adverse effect. The Section 4(f) alternatives discussion will discuss why certain improvements are needed to meet the purpose and need of the project, and ultimately SHPO will need to concur with the preferred alternative.

The 800.11(e) documentation should include the alternatives analysis and explain why the adverse effect is needed to meet the purpose and need of the project. In order to help mitigate “adverse effects” that do occur, per the PA, the bridge owner will complete any photo documentation in accordance with the specifications provided by the Indiana SHPO.

Q: Is a Section 106 Public Notice published in a local newspaper required for historic bridge projects now?

A: No, a separate newspaper notice is not needed as long as the public hearing notice indicates that the hearing serves as the opportunity for the public to comment on both the CE and the 800.11(e) documentation, and serves as the last opportunity for a responsible party to step forward and take ownership of a Non-Select bridge. Additionally, if other historic properties are located within the project APE, as long as the hearing notice indicates that the hearing serves as the opportunity for comment on the effects of the project on those properties, no need exists for a separate Section 106 Public Notice published in a local newspaper.

Q: Is a public hearing required for all historic bridge projects now?

A: Yes, per the Historic Bridge PA, all projects involving either a Select or a Non-Select bridge now require a public hearing.