

December 31, 2020

Dear Section 106 Consulting Parties

Re: Canadian County Federal Highway Administration (FHWA) Project: JP 26360(04); Improvements to US-281 bridge over Canadian River (Bridgeport Bridge); Design Support report submittal, selection of proposed alternative, and determination of effect submittal for comment under the National Historic Preservation Act (NHPA).

## Introduction

Thank you for your continued participation in the proposed Bridgeport Bridge project, and for your attendance at our recent Section 106 consulting party meeting held on July 9, 2020. As you recall, the topic of that meeting was to review alternatives that ODOT has been considering for the proposed project and to discuss a new alternative that ODOT presented as part of a USDOT Better Utilizing Investments to Leverage Development (BUILD) Grant that ODOT had applied for in May 2020. That application was in support of the construction of a new multi-beam superstructure to which ODOT would attach the existing pony truss panels. The project, as proposed in the grant, would widen the roadway to 28 feet clear roadway width.

As you are aware, ODOT was awarded the \$22 million BUILD Grant in September 2020. ODOT is aware that the Bridge has since been nominated to the National Register of Historic Places as a nationally significant individual property in December 2020.

Throughout this process, and since 2015, ODOT has been preparing a Design Analysis report to document existing conditions of the bridge and assess the alternatives that must be reviewed for a Programmatic Section 4(f) for historic bridges. In accordance with 23 CFR 774, FHWA may not approve of the “use” of a Section 4(f) property unless there is no feasible and prudent alternative, and the action includes all possible planning to minimize harm.

The bridge consists of 24-foot-wide clear roadway that is currently posted at a nine-ton weight limit. Truck traffic accounts for 21 percent of the 1800 vehicles per day that cross the bridge, with approximately 12 percent being heavy trucks, including oilfield equipment. Some of this heavy traffic includes recreational vehicles (RVs) associated with the heritage tourism that Route 66 brings to Oklahoma. As such, ODOT has identified a need to address the narrow width, provide a sustainable solution to the crossing that will allow for heavy traffic to pass, and preserve the intrinsic value of Route 66 in Oklahoma.

## Discussion of Alternatives; ODOT Submittal for FHWA Approval

Please find the attached Design Support Report for the Programmatic Section 4(f) for the historic Bridgeport Bridge. This document consists of an analysis of all alternatives ODOT must consider before “using” the historic bridge. In addition, ODOT has included several other alternatives that have been considered in the analysis. These alternatives have been discussed in previous correspondence and Section 106 consulting party meetings, and posted on our website on June 4, 2019. The appendices to the Design Support number over 800 pages. As such, we have placed the appendices on our project website as well (<http://www.odotculturalresources.info/bridgeport-bridge.html>).

The Design Support represents an engineering analysis of the current structure and is used as a supporting document in the 4(f) process. **The Design Support is *not* a decision document.** The broad alternatives discussed in the report include:

*“The mission of the Oklahoma Department of Transportation is to provide a safe, economical, and effective transportation network for the people, commerce and communities of Oklahoma.”*

1. Do nothing.
2. Build a new structure at a different location without affecting the historic integrity of the old bridge, as determined by procedures implementing the NHPA.
3. Rehabilitate the historic bridge without affecting the historic integrity of the structure, as determined by procedures implementing the NHPA.

After careful review of the alternatives that meet the purpose and need of the project, in conjunction with the comments we received from consulting parties and the public (virtual public meeting held between September 29 and October 15, 2020, and in consideration of the grant that ODOT was awarded, ODOT plans to submit Alternative E, Option 2 to FHWA for approval.

Alternative E, Option 2 includes constructing a new superstructure on the existing piers. New concrete pier caps would be constructed on the existing columns with new steel beams that span between the piers. A new concrete deck would be constructed on the steel beams. The existing pony truss panels would be attached to the exterior fascia of the bridge. The truss panels would be placed in such a way such that they would appear functional but would not be relied upon to perform in a significant structural load carrying capacity. Context-sensitive crash-tested railing would be implemented on the new structure, and ODOT will follow the recommendations in the ODOT *Historic Bridge Railing Study for Route 66 Bridges* (<http://www.odotculturalresources.info/route-66.html>).

This alternative meets the purpose and need of the project by providing a long-term solution to the transportation challenge at this crossing. It will remove the nine-ton load limit, provide a crossing that provides all drivers a greater comfort level on the facility, and it preserves the intrinsic qualities of Route 66 on Oklahoma. While this alternative does preserve the setting, location, feeling, and association—along with some original materials (i.e., existing piers and truss panels)—there is sufficient integrity loss in design and workmanship to the degree that the proposed undertaking, if approved by FHWA, would constitute an adverse effect to the historic bridge. It is our opinion that the structure would retain sufficient historic integrity such that the Bridgeport Hill to Hydro historic district would not be adversely affected.

## Summary

In accordance with 36 CFR 800.5(a), ODOT has applied the criteria of adverse effect and determined that Alternative E, Option 2 will have an adverse effect to the historic Bridgeport Bridge, a property listed on the NRHP. ODOT has submitted this opinion to Oklahoma SHPO. In accordance with 36 CFR 800.5(b), ODOT has submitted the opinion to SHPO that the proposed alternative will have no adverse effect to the Bridgeport Hill to Hydro historic district, also listed on the NRHP. The historic district will retain several aspects of integrity necessary for the *district* as a whole to continue to convey its significance under criteria A and C

We respectfully submit ODOT's decision to pursue the *approval* of Alternative E, Option 2 from FHWA and the prudence of that alternative when considering the purpose and need of the project, the impacts to other environmental resources, the grant ODOT has received, and the cost of this alternative.

ODOT requests a virtual Section 106 consulting party meeting to be held in late January in order to address consulting party questions or comments on the proposed alternative and discuss mitigation measures to address adverse effects and minimize harm.

Once the consulting party meeting has concluded, ODOT would incorporate the results of our Section 106 consultation, and other environmental reviews, and submit the 4(f) analysis and Alternative E, Option 2 to FHWA for approval. ODOT must carefully consider several factors in its decision to pursue FHWA approval of Alternative E, Option 2. Many of these factors include constraints that other state and federal agencies consider important. ODOT will also weigh this alternative with comments from the public.

Please visit the webpage (<http://www.odotculturalresources.info/bridgeport-bridge.html>) for all project documentation. If you have any questions, Please do not hesitate to contact me at 405-325-7201 or [ssundermeyer@odot.org](mailto:ssundermeyer@odot.org).

Sincerely,



Scott Sundermeyer  
Director, ODOT Cultural and Natural Resources Program

Cc:

Preservation Oklahoma, Inc.  
Oklahoma Historic Bridge and Highway Group  
Jim Ross  
Historic Bridge Foundation  
Oklahoma Route 66 Association, Inc.  
National Park Service Route 66 Corridor Preservation Program  
Oklahoma Tourism and Recreation Department  
Route 66 Road Ahead Initiative  
National Trust for Historic Preservation