

OKLAHOMA DEPARTMENT OF TRANSPORTATION CULTURAL RESOURCES PROGRAM



Cultural Resources Workshop – August 28, 2013

Objectives

- 1) Introduction of ODOT-CRP – who we are, what we do
- 2) Discussion of federal regulations and ODOT procedures
 - ▣ National Historic Preservation Act (Section 106)
 - Tribal Consultation
 - ▣ National Environmental Policy Act and cultural resources
 - ▣ Section 4(f) of the USDOT Act and cultural resources
- 3) Project delivery and streamlining
- 4) Administrative topics

Introduction to the Team

- Scott Sundermeyer – Director
- Robert Bartlett – Special Projects
- Rhonda Fair – Tribal Liaison
- Anna Eddings – Architectural Historian
- Victoria (Tori) Raines – Architectural Historian
- Mike McKay – Archeologist
- Kristina Wyckoff – Archeologist
- Nicholas Beale – Archeologist

Tasks of ODOT-CRP

- Conduct Cultural Resources Reviews and Investigations*
 - Collect and provide cultural resources recon data
 - Review ODOT projects, prepare evaluations and CR documentation under NHPA
 - Prepare Programmatic Bridge 4(f) evaluations
 - Prepare Memoranda of Agreements (MOAs)
 - Conduct or review mitigative measures
 - Provide CR documentation to ODOT Environmental Programs Division and Consultant NEPA Project Managers

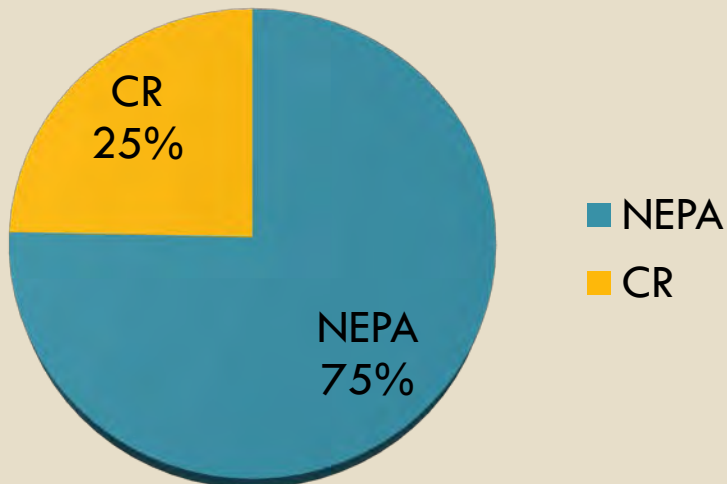
* For in-house and consultant projects

Tasks of ODOT-CRP (continued)

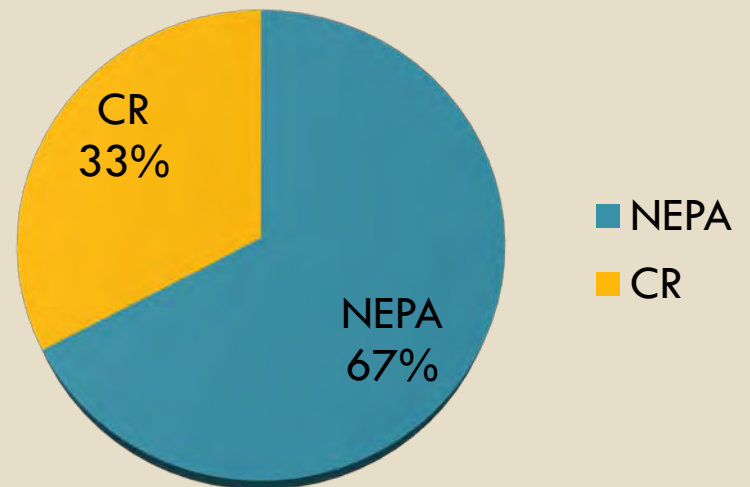
- **Off Project Facility Reviews: Division Residencies contact CRP for file search**
 - ▣ All borrow pits
 - ▣ Equipment staging areas
 - ▣ Spoil dumps
 - ▣ Asphalt/concrete plants
- **Utility Permit Reviews:**
 - ▣ All utility installations in ODOT R/W require an archeological file review
 - ▣ Program maintains files of archeological sites in ODOT R/W
- **Investigation and Assessment of Inadvertent Finds
- Post-review Discoveries**

CR component of NEPA studies

**CR percentage of entire
NEPA document
(includes PM time)**



**CR percentage versus
remaining environmental
studies
(includes PM time)**



Section 106

Review and Compliance



Law and Regulatory Requirements

National Historic Preservation Act of 1966 (NHPA)

- Legislation intended to help preserve historical and archeological sites in the United States.
 - Signed as policy on October 15, 1966
 - Articulated a national policy governing the protection of “significant” cultural resources during a time when other environmental laws were being instituted.
 - System of “procedural” steps that *encourage* cultural resource protection through review and consultation.

National Historic Preservation Act

Section 106 of the NHPA –

The review process as defined in 36 CFR 800

- Requires that every federal agency take into account the effects of the agency's undertaking on properties.
- Requires that the agency make a reasonable and good faith effort to identify historic properties (36 CFR 800.4).
 - ACHP recently issued guidance on this
 - http://www.achp.gov/docs/reasonable_good_faith_identification.pdf
- The **Federal Agency** is responsible for scope of identification efforts, determination of eligibility and effect, and mitigating effects.
 - FHWA-OK has delegated much of this authority to ODOT

National Historic Preservation Act

Section 112(a) of the NHPA – Professional Standards

(1) (A) All actions taken by employees or contractors of such agency shall meet professional standards under regulations developed by the Secretary in consultation with the Council...specifically archaeology, architecture, conservation, history, landscape architecture, and planning.

(B) Agency personnel or contractors responsible for historic resources shall meet qualification standards established by the Office of Personnel Management in consultation with the Secretary and appropriate professional societies of the disciplines...

Qualified Practitioners

Professional Standards 36 CFR 61, Appendix A; 48 FR 44716

□ **Archeology**

- The minimum professional qualifications in archeology are a graduate degree in archeology, anthropology, or closely related field...

□ **Architectural History**

- The minimum professional qualifications in architectural history are a graduate degree in architectural history, art history, historic preservation, or closely related field, with coursework in American architectural history, or a bachelor's degree in architectural history, art history, historic preservation or closely related field with experience...

Definitions (36 CFR 800.16) and Section 301 NHPA

Undertaking

a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including:

- (A) those carried out by or on behalf of the agency;
- (B) those carried out with federal financial assistance;
- (C) those requiring a federal permit, license, or approval; and
- (D) those subject to state or local regulation administered pursuant to a delegation or approval by a federal agency.

Federal Action in NEPA lingo

Historic Property

any prehistoric or historic district, site, building, structure, or object included in, *or eligible for inclusion in*, the NRHP

Effect

alteration to the characteristics of a historic property

Impact in NEPA lingo

Definitions (continued)

□ Area of Potential Effect (APE)

Definition from 36 CFR Section 800.16(d):

“geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.”

- The APE will be informally based on the size, scope, context, and visual intrusiveness of a project.
- For most projects, ODOT identifies the APE as the “Study Area.” ODOT does not consult with SHPO to establish the APE unless the project incorporates significant alterations to the existing location or includes adjacent historic properties.

Expanded APE (SH-123 Caney River)



SH-123 over Caney River



National Register of Historic Places

- Properties listed in the National Register of Historic Places (NRHP) include resources that are significant in American history, architecture, archeology, engineering, and culture.
 - ▣ Building – created principally to shelter any form of human activity
 - ▣ Structure – bridge, highway, railroad tunnel
 - ▣ Object – monument, milepost, statue, fountain
 - ▣ Site – location of significant events...where location itself possesses historic, cultural, or archeological value
 - ▣ District – a continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development

Criteria for Eligibility

- **A: *Awesome Event*:** Resources “that are associated with events that have made a significant contribution to the broad patterns of our history”
- **B: *Big People*:** Resources “that are associated with the lives of persons significant in our past”
- **C: *Cute Properties*:** Resources “that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction”
- **D: *Data*:** Resources “that have yielded, or may be likely to yield, information important in prehistory or history”

Resources Must Have Integrity

- Defined in 36 CFR 60.4-Criteria for evaluation
- Regulations state that the resource must have integrity of:
 - ▣ location – place where property was constructed or event occurred
 - ▣ design – combination of elements that create the form
 - ▣ setting – the physical environment of property
 - ▣ materials – physical elements that were combined or deposited
 - ▣ workmanship – craft of a particular culture, person, or people
 - ▣ feeling – property's expression of historic sense of particular time
 - ▣ association – direct link between the event or person

Section 106 in Practice

1) Initiate the Process

- ▣ Establish Undertaking

- ▣ If the undertaking is a type of activity that does not have the potential to cause effects on historic properties...the agency official has no further obligations under section 106 or this part

- ▣ Identify Consulting Parties

- ▣ Define the area of potential effect (APE)

2) Identify Historic Properties within APE

3) Apply eligibility criteria to those properties

- ▣ National Register Bulletin 15

4) Determine effects

- ▣ Apply Criteria of Adverse Effect (36 CFR 800.5)

5) Resolve effects that are adverse

1 - Initiate the Process

- a) Identify Consulting Parties (36 CFR 800.2)
- Who are you going to talk with?
 - ▣ Mandatory: SHPO, THPOs, Native American Tribes
 - ▣ Sometimes: ACHP, other federal agencies, local government or advocacy groups
 - ▣ Recommended: All others interested (Other Consulting Parties)
- b) Define APE (36 CFR 800.4(1) and 36 CFR 800.16)
- Where there's potential to affect historic properties
 - ▣ Physical, visual, audible, atmospheric, etc.
 - ▣ Direct, indirect, cumulative
 - ▣ May be multiple areas
 - ▣ May change in course of review

2 - Identify Historic Properties

- Study, consultation, fieldwork as needed
- ...reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews, sample field investigation, and field survey...
 - ▣ Don't assume "standard" survey required
- Find places that are/may be significant
- 45 years old or older

Identify Historic Properties (continued)

- Identification of historic properties
 - Desktop research
 - Maps and aerials, NRHP/DOE list
 - Consultation
 - Responses received from consulting parties
 - Survey
 - Boots on the ground

3 – Apply Eligibility Criteria

National Register Bulletin 15

- The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and meet Criteria A, B, C, or D.

Criteria Considerations (Exceptions) –

- a. a religious property deriving primary significance from architectural or artistic distinction or historical importance;
- b. a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event;
- c. a birthplace or grave of a historical figure of outstanding importance if there is no other appropriate site or building directly associated with his or her productive life;
- d. a cemetery that derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- e. a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- f. a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance;
- g. a property achieving significance within the past 50 years if it is of exceptional importance.

4 - Determine Effect

- No Effect
 - ▣ No historic properties in APE
 - ▣ Historic properties in APE but they won't be affected by undertaking
- Adverse Effect 36 CFR 800.5(a)(1)
 - ▣ undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.
 - ▣ Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.
- No Adverse Effect
 - ▣ Historic properties in APE but they will not be adversely affected (do not meet criteria above).

5 - Resolve Adverse Effects

- Avoid, Minimize, Mitigate
- Reach consensus through consultation
 - Agreement on mitigation measures
- MOA
 - Documentation of the consensus
 - Specifies what will be done to mitigate adverse effects -- or it accepts them
 - Phase III data recovery of archeological site
 - HABS/HAER documentation of buildings and structures
 - Other mitigation measure
 - Signed by agency, ACHP, SHPO, THPO, tribes, others



Adverse Effect

Archeology

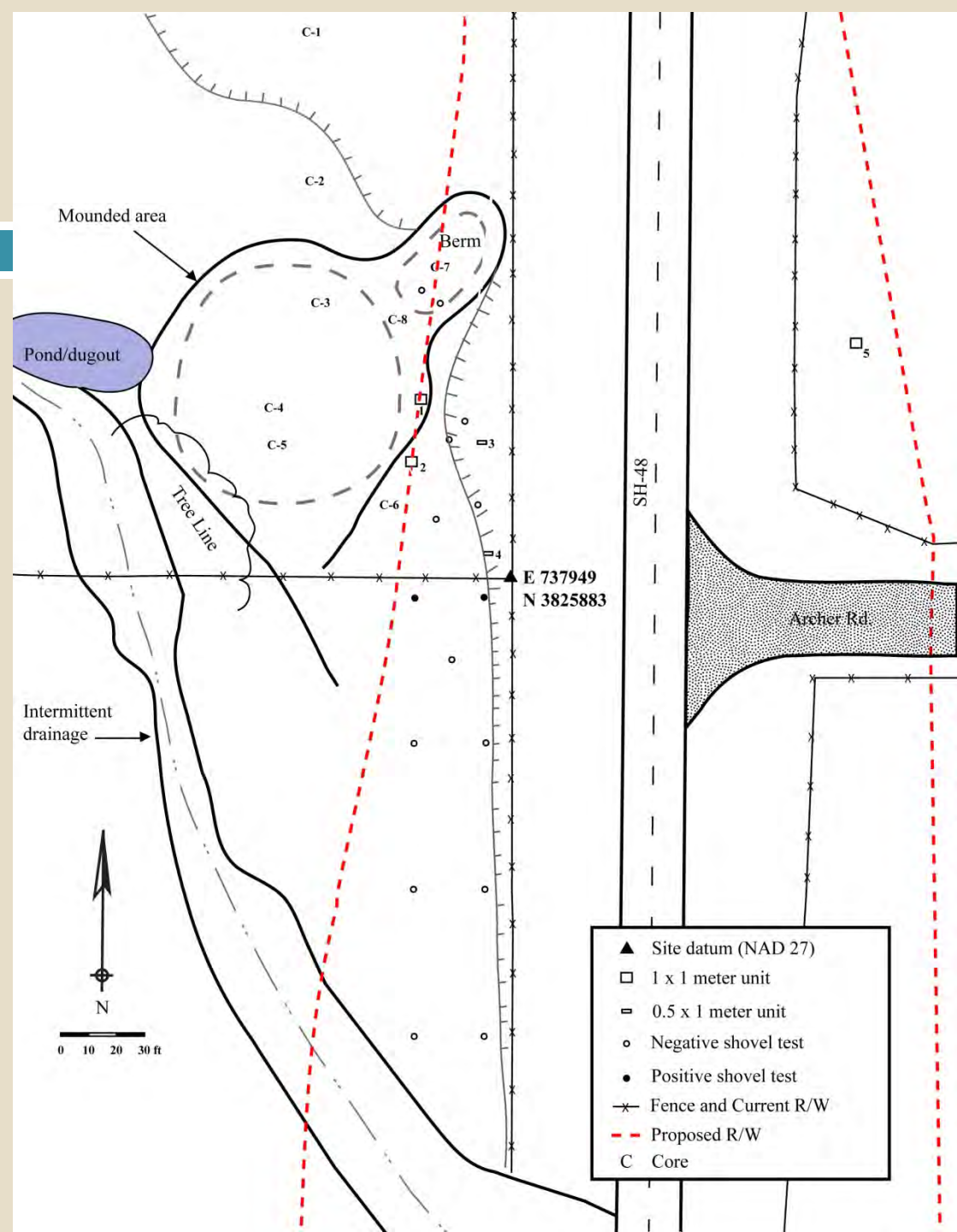
SH-48 over tributary to Clear Boggy Creek

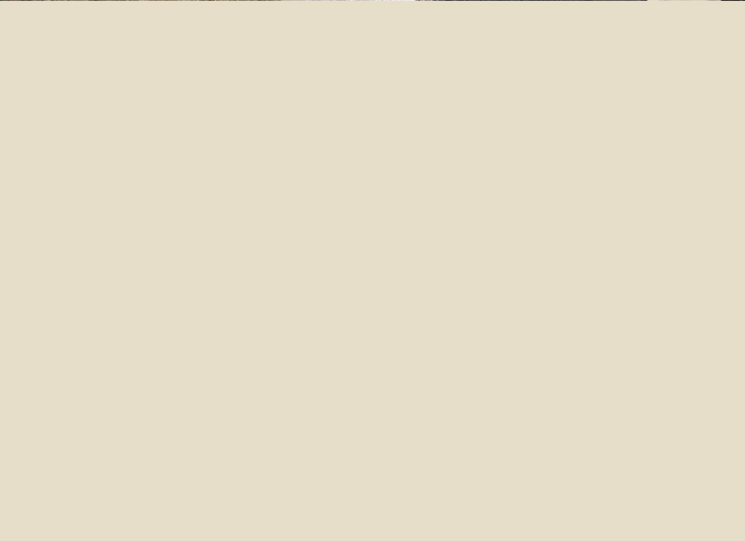
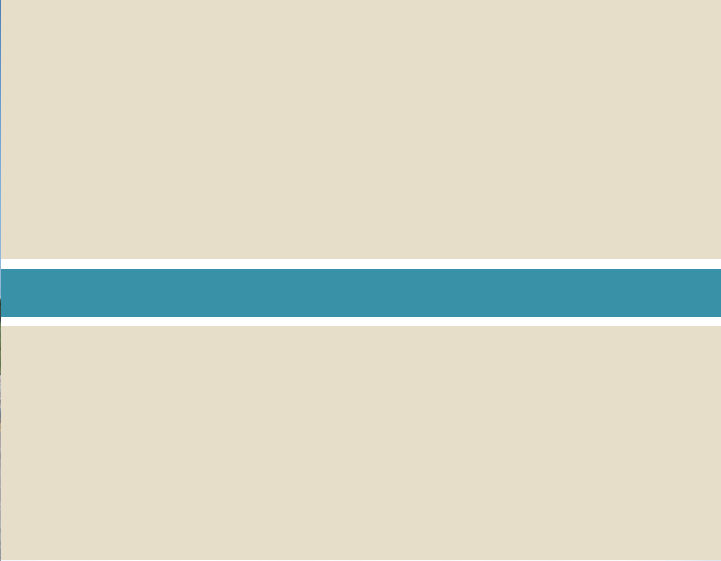
Coal County – site 34CO29

Site was reported by a sociology professor from Southeastern Oklahoma State in 1974.

Site was recorded (mound only) in 1974 and revisited in 1980 and 1987. Site has been described as an Archaic through Woodland period midden mound with well-preserved deposits.

ODOT-CRP revisited site in March and August 2009







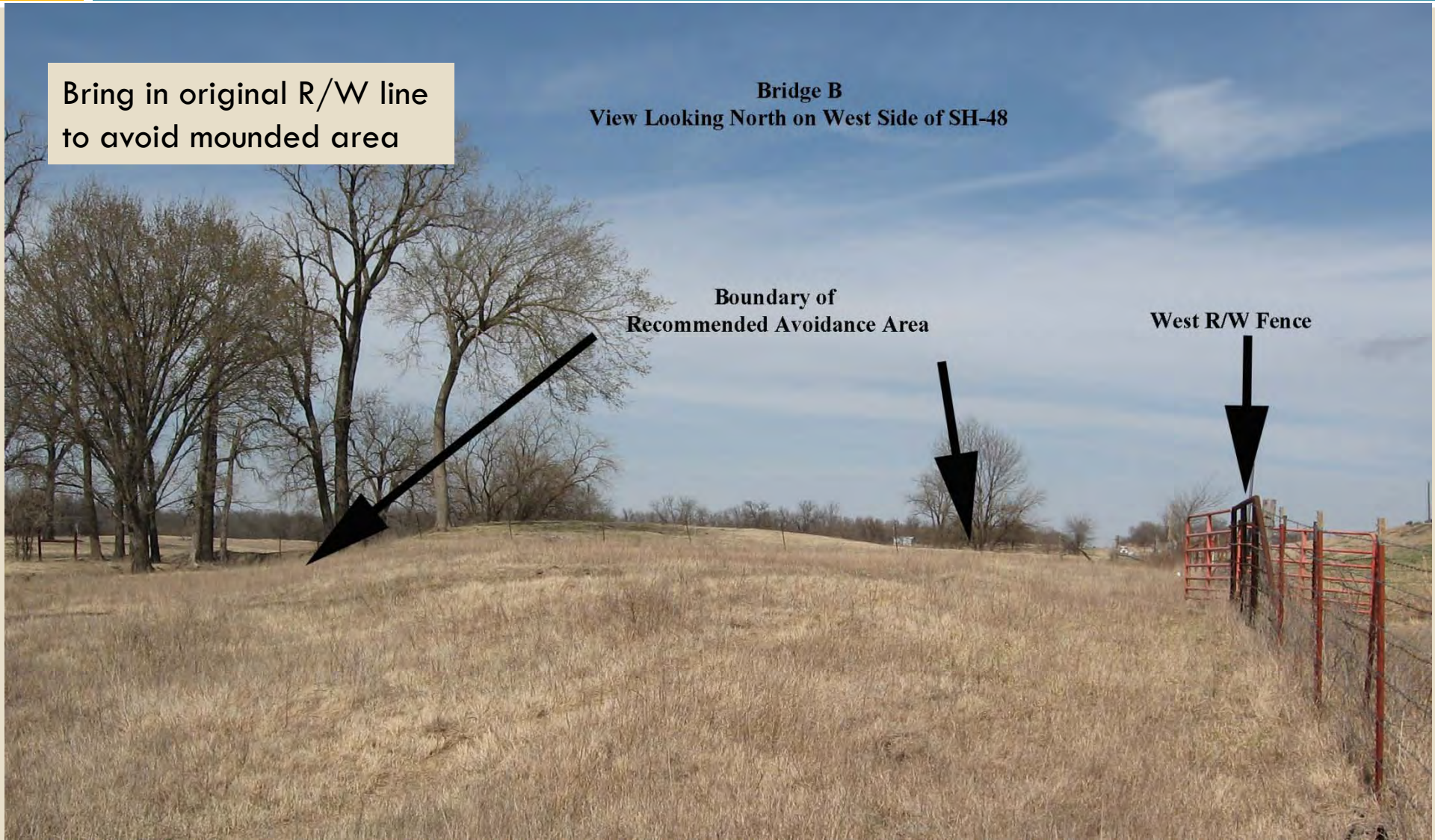
Avoid/Minimize for Site 34CO29

Bring in original R/W line
to avoid mounded area

Bridge B
View Looking North on West Side of SH-48

Boundary of
Recommended Avoidance Area

West R/W Fence



Mitigation for 34CO29

- Preparation of MOA for the recovery of data from portion of site affected by undertaking
 - MOA called for hand excavation of a number of 1-by-2-m units within R/W, analysis of cultural materials recovered, dating of organic materials, flotation of soil from features, source analysis of obsidian, and site stripping prior to construction.
- Signed by FHWA, ODOT, Caddo Nation, Oklahoma SHPO, and State Archeologist

**MEMORANDUM OF AGREEMENT
SUBMITTED TO THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
PURSUANT TO CFR 800.6(A)**

WHEREAS, the Federal Highway Administration (FHWA) has determined that Federal-Aid Project BRFY-115C(026); State Job Piece 20967(04) for SH-48 Bridge Replacement over Clear Boggy Creek will have an adverse impact to archeological site 34CO29 Coal County, Oklahoma, a property determined eligible for inclusion in the National Register of Historic Places under Criteria D for recoverable data the site contains regarding prehistoric activities and occupations in Coal County, Oklahoma, and has consulted with the Oklahoma State Historic Preservation Officer (SHPO) and Caddo Nation of Oklahoma pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470f);

WHEREAS, in accordance with 36 CFR Part 800.6(a)(1), the FHWA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR Part 800.6(a)(1)(ii);

NOW, THEREFORE, FHWA, Oklahoma Department of Transportation (ODOT), and the Oklahoma State Archeologist, SHPO, and the Caddo Nation of Oklahoma agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

**STIPULATIONS
ARCHEOLOGICAL SITE 34CO29**

FHWA will ensure that the following measures are carried out:

- I. Prior to the initiation of construction, the portion of 34CO29 falling within the Area of Potential Effect (APE) will be subject to data recovery efforts. Previous investigation has determined the site contains Woodland period cultural material, which relate to prehistoric occupations in what is now Coal County, Oklahoma approximately 2000 years ago. The data recovery will include the following:
 - A. Hand excavation of four 1 x 2 meter units within the approximately 33' x 200' portion of the site falling within the APE west of SH-48. The units will be enlarged as needed to adequately uncover, document and recover any potential feature that may be encountered in any unit.
 - B. Hand excavation of ten 1 x 2 meter units within the portion of the site falling within the triangular shaped APE east of SH-48. The site area in the APE here is approximately 200' long and 50' wide at its widest and tapers down from that point. The units will be enlarged as needed to adequately uncover, document and recover any potential feature that may be encountered in any unit.
 - C. Subsequent to completion of the hand excavations, the site area within the APE west and east of the highway will be machine stripped of top soil to identify any potential features not encountered during hand excavations. Any features that may be exposed will be documented and recovered.
 - F. All recovered items will be curated in an Oklahoma based facility in accordance with

34CO29 Data Recovery



34CO29 Data Recovery



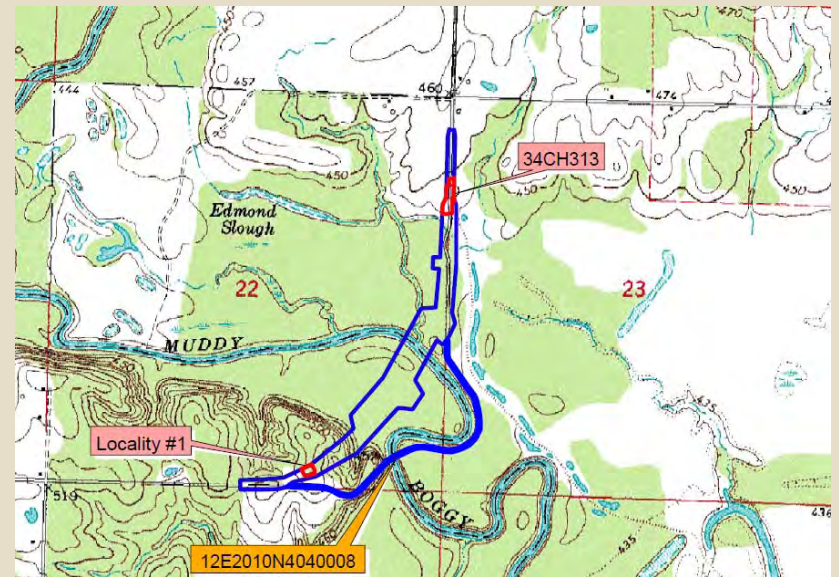
34CO29 Data Recovery



Adverse Effect - minimize

Mixed truss over Muddy Boggy
Creek in Choctaw County
Constructed in 1919

New bridge on new alignment
- Minimized the adverse effect



Carpenter's Bluff Bridge - minimize

Mixed truss bridge constructed as a rail bridge in 1910

Has a wagon shelf to allow pedestrians, horses, and horse-drawn vehicles

Converted to vehicular traffic in 1960s



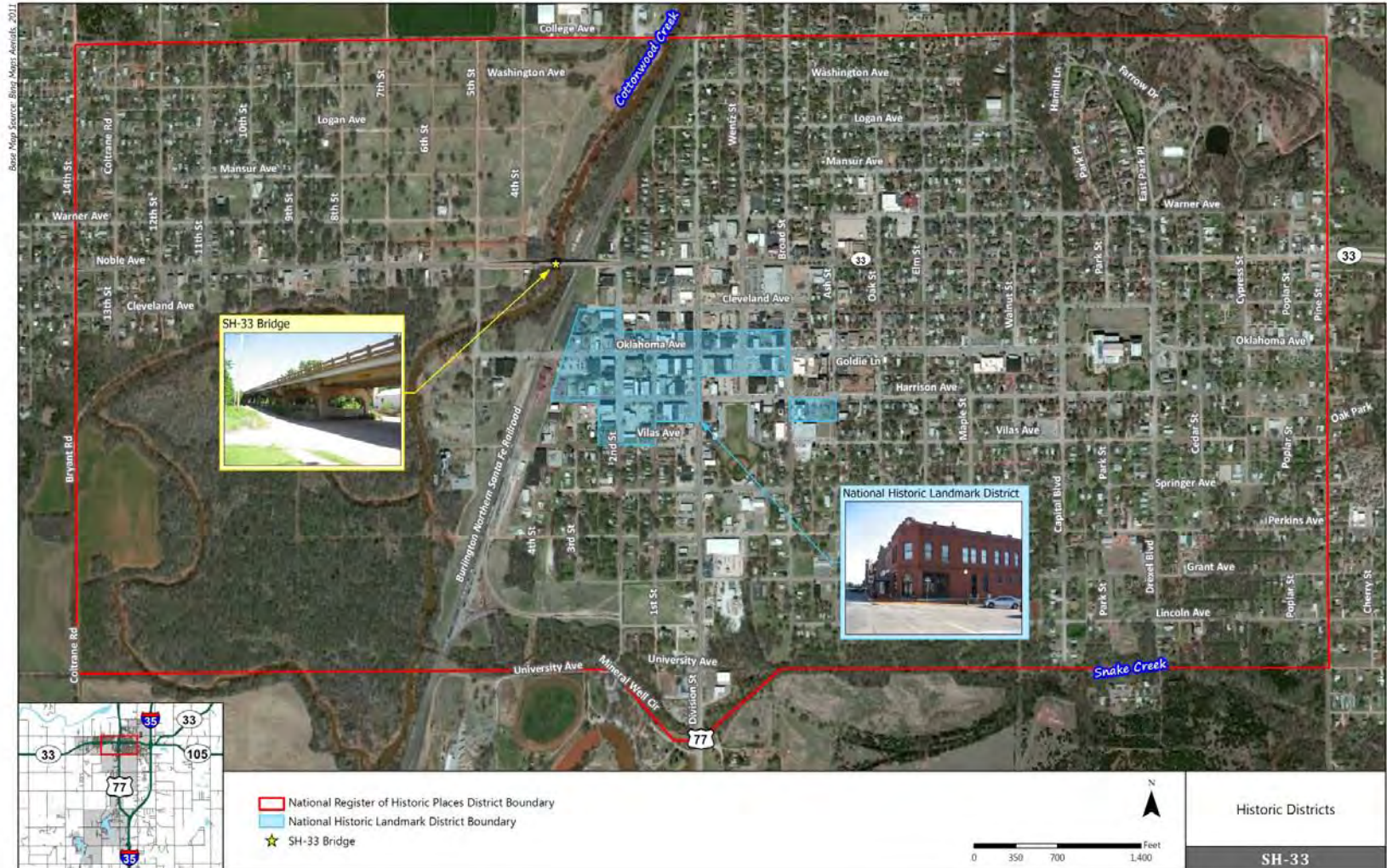
Alternatives Considered

Alternatives 1, 2,
and 3 are north of
existing bridge

Alternative 4 is
parallel to
existing bridge



SH-33 over Cottonwood Creek



- 1937 double-deck bridge
- Funded by a New Deal-era grade-crossing program
- Eligible for NRHP in 2009
- In Guthrie NRHP District
- Adjacent to Guthrie NHL* District
 - nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States





12TH ST

11TH ST

10TH ST

9TH ST

33

NOBLE AVE

12TH ST

11TH ST

10TH ST

9TH ST

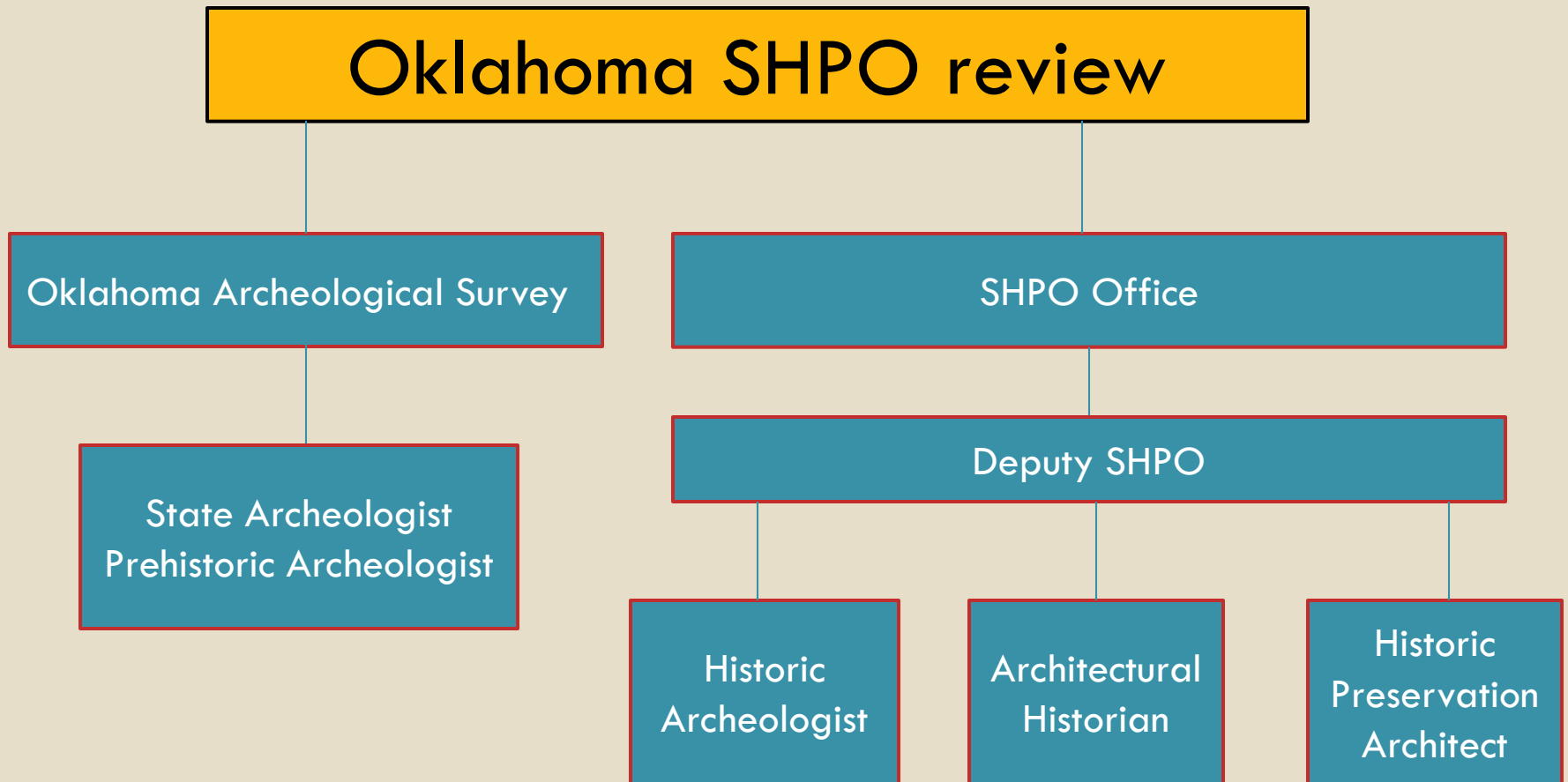
CLEVELAND AVE

Cottonwood Creek





Oklahoma SHPO Review Procedures





Tribal Consultation

FHWA | Environmental Review Toolkit | Historic Preservation | Program Overview - Windows Internet Explorer

http://www.environment.fhwa.dot.gov/histpres/index.asp

File Edit View Favorites Tools Help

U.S. Department of Transportation
Federal Highway Administration

FHWA Home | Feedback

Environment

TOOLKIT HOME Planning and Environment NEPA and Project Development Streamlining/Stewardship Historic Preservation Section 4(f) Water, Wetlands, and Wildlife

Historic Preservation

Program Overview

Archeology

Historic Bridges

Historic Roads

Interstate Highway

Tribal Issues

Streamlining

Recommendations

Resources

More Information

Website Feedback

Program Overview

Historic preservation has been a Federal concern since 1906 when the Antiquities Act provided for the protection of historic and prehistoric remains and monuments on Federal lands. Since that time, Congress has made historic preservation a responsibility of every Federal agency, enacting multiple laws that extend the consideration of our nation's historic and archeological resources to properties beyond Federal lands and reflect the importance the American people attach to safeguarding and maintaining the places that embody our nation's rich heritage. Chief among these are the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act of 1966.

The FHWA Historic Preservation and Archeology Program provides guidance and technical assistance to Federal, State, and local government staff regarding these Federal laws, as well as regulations, executive orders, policy, procedures, and training on topics related to historic preservation and cultural resources. This website provides information geared to the Federal-aid highway program and its related projects. Information contained on this website offers guidance, recommendations, and successful practices to help address historic preservation/cultural resource issues during the transportation project planning and development process. The Resources section of this website is designed to provide other useful information including, partner agencies, professional organizations, relevant legislation, publications, and conferences and meetings.

FHWA's [Guidance on Historic Preservation and Archeology](#) provides links to various guidance documents addressing issues associated with historic preservation. [See the legislation](#) relate to protection of irreplaceable historic resources and find additional information under these topic areas:

- Archeology
- Historic Bridges
- Historic Roads
- Interstate Highway System
- Tribal Issues
- Streamlining Historic Preservation
- Resources

Contacts

FHWA Office of Project Development and Environmental Review E76 1200 New Jersey Avenue, SE Washington, DC 20590	MaryAnn Naber Federal Preservation Officer (202) 366-2060 maryann.naber@dot.gov	Owen Lindauer, Ph.D. and RPA Project Development Specialist/Archeologist (202) 366-2655 owen.lindauer@dot.gov
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FHWA

United States Department of Transportation - Federal Highway Administration

Internet 100%

FHWA Historic Preservation

<http://environment.fhwa.dot.gov/histpres/index.asp>



10 MINUTE BREAK

THEN

RECAP OF NHHPA



Integrating Cultural Resources Studies in NEPA Compliance



National Environmental Policy Act (NEPA)

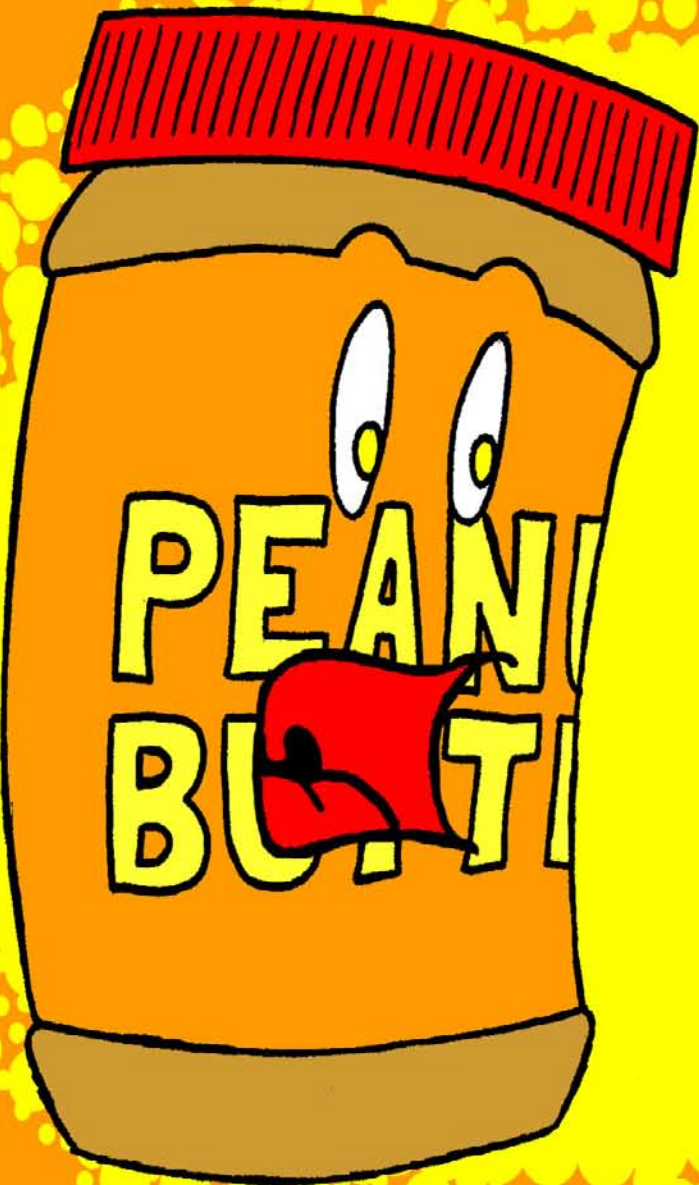
Enacted 1969, effective January 1, 1970

Signed into law by President Richard Nixon

Section 101 – Policy (Spirit of Law)

Section 102 – Procedures (Letter of Law)

Regulations: 40 CFR 1500-1508



Section 101 NEPA Policy

- Use all practicable means and measures to protect environmental values
 - “Create and maintain conditions under which man and nature can exist in productive harmony and fulfill the social, economic, and other requirements of present and future generations of Americans” Sec. 101(a)
 - “Aesthetically and culturally pleasing surroundings” Sec. 101(b)(2)
 - “Important historic, cultural, and natural aspects of our national heritage” Sec. 101(b)(4)
- accommodate historic preservation concerns with the needs of Federal undertakings
 - This is even too gooey for Section 106
 - district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP
 - NRHP resources are inherently “aesthetically pleasing” and/or important aspects of national heritage
-
- The diagram consists of blue lines that group items from the left list to items in the right list. A bracket on the right side of the first two items in the left list connects them to the first item in the right list. A bracket on the right side of the next two items in the left list connects them to the second item in the right list. A bracket on the right side of the last two items in the left list connects them to the third item in the right list.

Section 102 NEPA Procedures

Section 102 states that Agencies Shall...

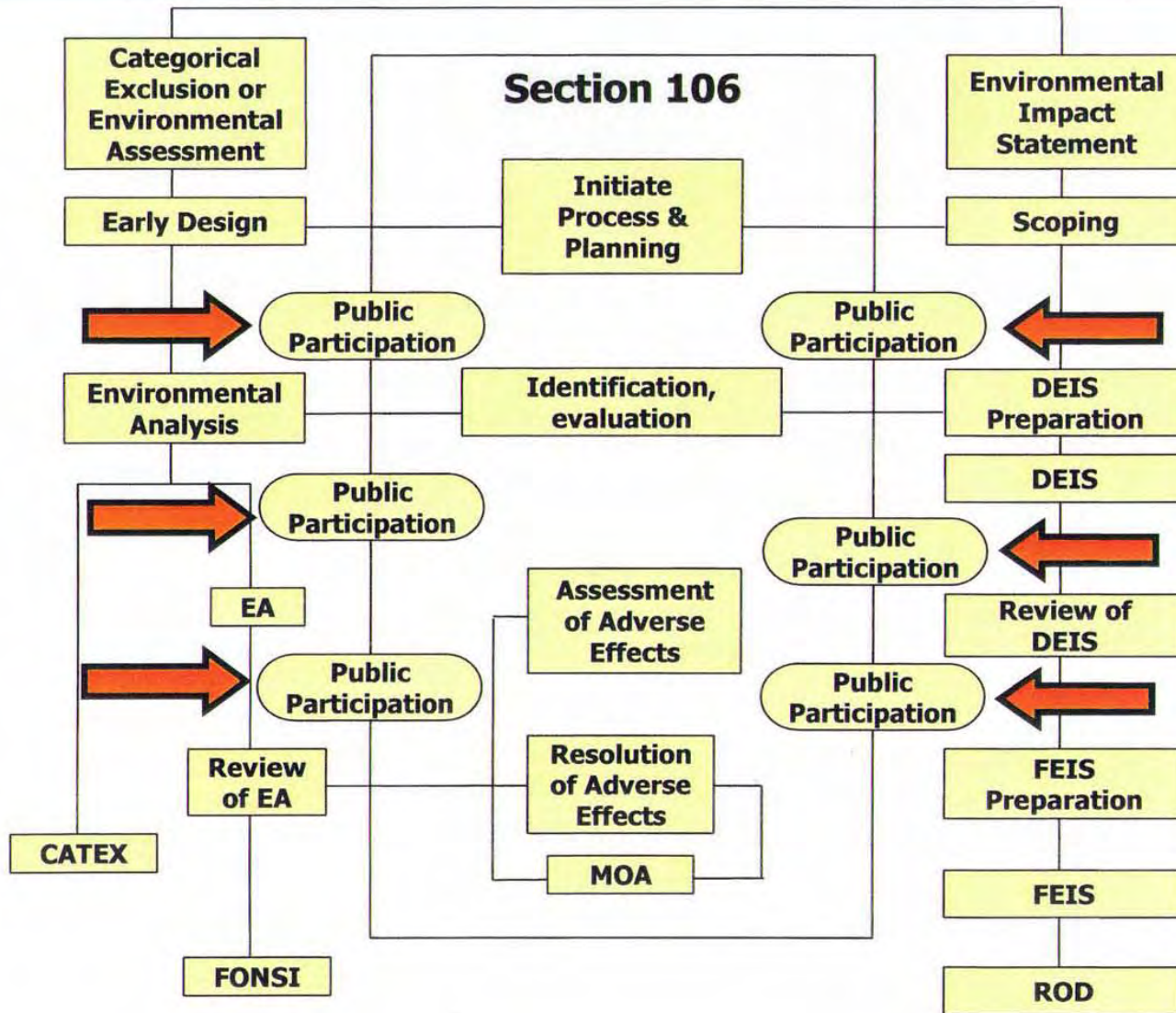
- “Utilize a systematic, interdisciplinary approach” to decision making, with “the integrated use of the natural and social sciences and the environmental design arts”

NEPA Principles and Section 106

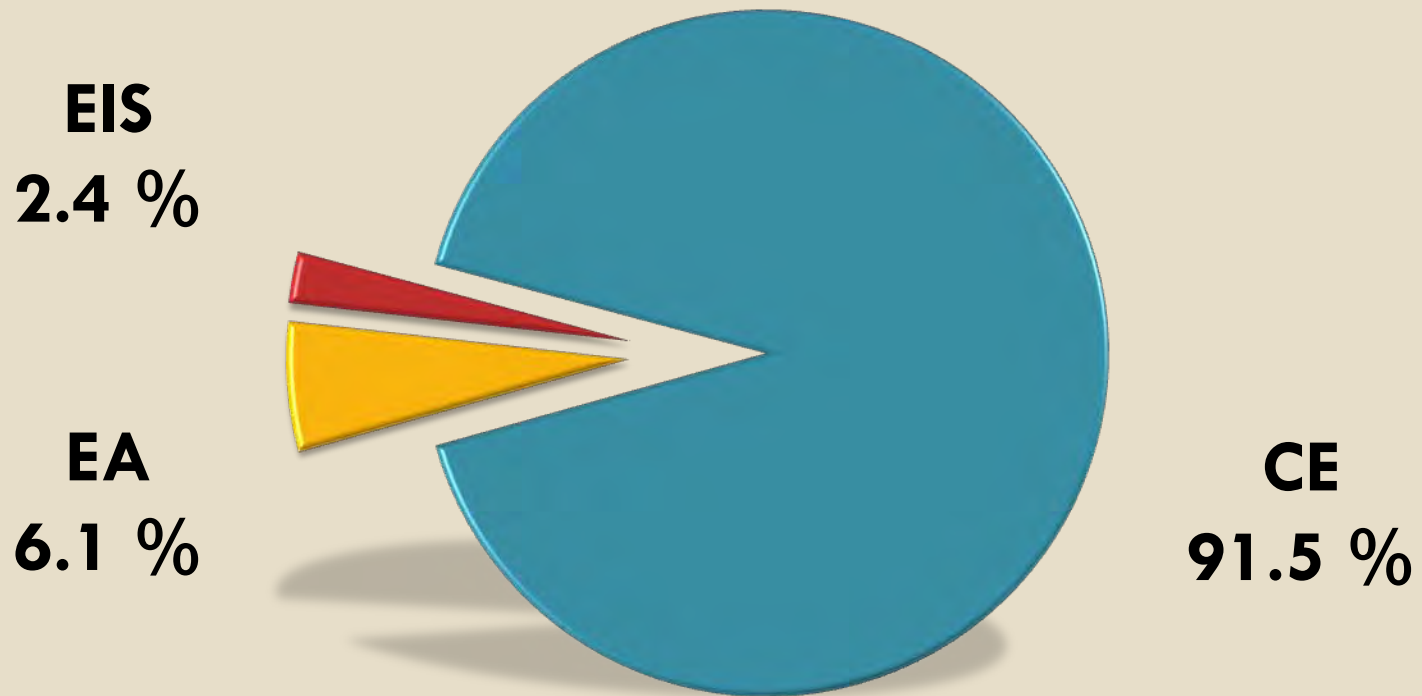
-
- Major Federal Action Significantly Affecting the Quality of the Human Environment
 - Consider impacts early in planning
 - Meaningful public involvement
 - Undertaking
 - Section 106...initiated early...so that a broad range of alternatives may be considered...
 - accommodate historic preservation concerns through consultation



NEPA and Section 106 Coordination



FHWA Projects by Classes of Actions



Things to Consider...

- The Cultural Resources Report is the primary CR documentation provided in a Categorical Exclusion
 - ▣ Language, terminology, APE/Study Area, project description need to be consistent with that of the CE.
 - ▣ Transmittal letters (consultation) need to be included as part of the document.
 - ▣ The Effect or *Impact* to a “historic property” can change the Class of Action of a NEPA document.

Section 4(f)



USDOT Act of 1966

Signed into law on October 15, 1966 (same day as NHPA)

Law applies only to USDOT agencies

Substantive – not Procedural

The Regulation (23 CFR 771)

- USDOT Agencies (FHWA, FTA, FRA, FAA, etc.)
- (a) (1) The Administration may not approve the use of land from a significant publicly owned public park, recreation area, or wildlife and waterfowl refuge, or any significant historic site unless a determination is made that:
 - (i) There is no feasible and prudent alternative to the use of land from the property; and
 - (ii) The action includes all possible planning to minimize harm to the property resulting from such use.

Section 4(f) Use

- Use of a Section 4(f) property:
 - ▣ Permanent use –
 - when land is permanently incorporated into a transportation facility
 - ▣ Temporary use –
 - when there is a temporary occupancy of land that is adverse in terms of the statute's preservation purpose
 - ▣ Constructive use –
 - a project's proximity impacts are so severe that the protected activities, features, or attributes of a property are substantially impaired
 - does not require the incorporation of the 4(f) land

Feasible and Prudent

□ Feasible

- An alternative is not feasible if it cannot be constructed in accordance with sound engineering principles and practices
 - Typically, alternatives that are studied in a Draft EA or DEIS are feasible; otherwise they would not have been carried forward for detailed study.

□ Prudent

- An alternative is not prudent if it creates truly unique problems or does not meet the project purpose and need.
 - Truly unique problems exist when an avoidance alternative creates unusual factors or costs, or community disruption of an extraordinary magnitude.
 - unacceptable social, economic or environmental impacts
 - serious community disruption
 - safety and geometric problems
 - construction costs

Section 4(f) Properties

- Parks, Recreation Areas, Refuges
 - ▣ Must be "publicly owned" (could be an easement)
 - ▣ Must be "open to the public" (except refuges)

- Historic Sites
 - ▣ Privately or public owned
 - ▣ Must be significant
 - Determined "significant" through the Section 106 process
 - ▣ Archeological resources are considered 4(f) resources only when
 - On or eligible for inclusion in the NRHP
 - Important for preservation in place
 - Versus what can be learned from their data recovery

Section 4(f) and ODOT-CRP

- Section 4(f) occurs mainly with bridges
 - Programmatic 4(f)
 - Allow transportation and resource agency officials in the field to make key determinations on projects having minor impacts on areas protected by Section 4(f).
 - Five total Programmatic 4(f) evaluations, two of which include historic properties
 - **Historic Bridges**
 - **Minor Involvements with Historic Sites**

Section 4(f) and Historic Bridges

- The Section 4(f) Policy Paper
 - ▣ Not considered a “use” when bridges are left in place
 - historic integrity and value will be maintained
 - FHWA should ensure that a mechanism is in place for continued maintenance of the bridge that would avoid harm to the bridge due to neglect
 - ▣ *Currently*, in Oklahoma, the mechanism that FHWA and ODOT have implemented would result in a SHPO opinion of adverse effect”, however this would not be a 4(f) use.

Streamlining and Project Delivery (EDC)

- The Every Day Counts initiative is designed to identify and deploy innovation aimed at reducing the time it takes to deliver highway projects, enhance safety, and protect the environment.
- Methods for streamlining
 - Cultural resources studies
 - Planning studies
 - TxDOT PALM
 - Broad-based NRHP evaluations of properties that are routinely encountered

OKLAHOMA HISTORIC BRIDGE SURVEY

Phase 1

A Re-Evaluation of *Spans of Time: Oklahoma Historic Highway Bridges*



Verdigris River 1925 Mixed Truss, Wagoner County



Bird Creek 1912 Stone Arch, Osage County

Oklahoma Department of Transportation
Planning and Research Division
Cultural Resources Program
May 2007

Bridge studies and streamlining

**Creek County: Sand Creek near
Bristow (May-December 2012)**



Project with bridge study

**Jackson County: unnamed creek near
Altus (August 2009-June 2011)**



Project without bridge study

Streamlining and Project Delivery

□ Methods for streamlining

■ “Screened Exemptions”

- Projects that do “not have the potential to cause effects to historic properties” [36 CFR 800.3(a)(1)]

- Within existing pavement lines
- Most on-system projects within existing R/W
- “Bridge rehab”
- “Some” bridge replacements

Streamlining and Project Delivery

□ Methods for streamlining

□ Program Comments (can be used by all agencies)

■ Post-1945 bridges (November, 2012)

- (A) Reinforced concrete slab bridges
- (B) Reinforced concrete beam and girder bridges
- (C) Steel multi-beam or multi-girder bridges
- (D) Culverts and reinforced concrete boxes

□ <http://www.odotculturalresources.info/post-1945-bridges.html>

Streamlining and Project Delivery

- Methods for Streamlining
 - ▣ Program Alternatives
 - Programmatic Agreements
- A document that records the terms and conditions agreed upon to resolve the potential adverse effects of a Federal agency program, complex undertaking or other situations in accordance with 36 CFR 800.14(b)

Types of Properties we encounter

- Bridges
- Culverts
- 19th and 20th century archeological sites
- Prehistoric archeological sites
- 19th and 20th Century Buildings
- Modern Localities
- Isolated Finds
- Traditional Cultural Properties (TCPs)

Measures to ensure seamless studies

- J/P and County on transmittals and email subject lines
- Please provide CR recon data (if available) and timeline to CR Specialists when asking them to propose hours*
- Initiate Tribal consultation and request CR Scope at same time (i.e. Check both boxes)
 - ▣ No environmental field studies can begin until 30 days after Rhonda has initiated Tribal Consultation
 - ▣ **Please copy your CR Specialist on the transmittal***
- First draft of no-find report can be emailed directly to me by CR Specialist*
 - ▣ Cc NEPA Consultant and ODOT PMs
- Consultant NEPA PM should review Project Description



RECAP AND QUESTIONS