



INDIANA DEPARTMENT OF TRANSPORTATION

INDIANAPOLIS, INDIANA 46204

Commissioner

May 29, 2015

Paul Diebold
Assistant Director, Preservation Services
Division of Historic Preservation and Archaeology
Staff of the Indiana State Historic Preservation Officer
402 W. Washington St., Room W274
Indianapolis, IN 46204

RE: Des. Nos.: 0800910
Roadway: SR 46
Project Description: Bridge No. 046-11-01316C over the Eel River, 2.8 miles east of SR 59
County: Clay
DHPA No. 10596

Dear Mr. Diebold,

As my staff has discussed with you and your colleagues in the Environmental Review section of your office, INDOT is proposing, with Federal Highway Administration (“FHWA”) funding, a project involving Bridge No. 046-11-01316C. As you are aware, Bridge No. 046-11-01316C was listed in the National Register of Historic Places (“National Register”) in 2000 under Criterion A for its association with events in the settlement and economic development of Clay County, Indiana. As part of the *Indiana Historic Bridge Inventory*, the bridge was determined to be Select. As you are probably aware, Select bridges are historic bridges that are most suitable for preservation and are excellent examples of a given type of historic bridge. The Individual Review conducted for the bridge as part of the *Inventory* process specifically designated the bridge “Select for Non-Vehicular Use,” indicating it is better suited for bicycle and/or pedestrian use than for vehicles. Therefore, INDOT’s preferred alternative for this bridge does involve the preservation of the structure for pedestrian use.

INDOT is proposing to dismantle and move the two spans of the bridge from its existing location in Clay County to two new locations along a trail in Brown County, Indiana. The existing bridge would be rehabilitated and relocated for use on the Salt Creek Trail, a 2.5-mile multi-use trail connecting Nashville to Brown County State Park, two heavily visited tourist destinations. The purpose of the trail project is to provide an alternative transportation mode for pedestrians that are currently using SR 46 to travel to land uses in and between Nashville and Brown County State Park. The conflict between pedestrians and the motoring public is currently unsafe. The trail will reduce traffic congestion between the County’s three largest motels and the shops in Nashville by providing pedestrian access rather than visitors driving to the shopping areas. In addition, the trail will provide a safe means of transportation for the youth of Nashville and Brown County as it will connect the Brown County School Corporation sports facilities. The trail has been under development for several years, with construction of the first phase already underway. The project includes two crossings of Salt Creek, approximately 0.7 mile apart from one another. The two spans of the existing bridge would be separated to cross Salt Creek at these two locations.

A detailed alternatives analysis regarding the potential options for this bridge was undertaken and was reviewed by your colleagues in the Environmental Review section. We do want to summarize here a few of the alternatives that were examined. The option to rehabilitation the bridge for continued vehicular use was examined. However, the bridge was originally designed with an H-20 structural capacity (20-ton truck) and current design standards require accommodation for HS- 20 structural capacity (36 ton truck); therefore, this alternative would require a Level 1

design exception from INDOT and FHWA. Based on this bridge's location on a National Truck Route and the number of heavy trucks known to use the bridge, INDOT and FHWA have indicated that this design exception would not be approved.

The option of keeping the bridge in place in Clay County and bypassing it with a new bridge was explored both from the perspective of the existing bridge serving as one half of a one-way pair of bridges and with the existing bridge being confined to pedestrian use. The one-way pair alternative was dismissed because it would require the same Level 1 design exception from INDOT and FHWA for structural capacity as indicated above, which would not be approved.

The bypass for pedestrian use alternative at the bridge's existing location was dismissed based on the location of the bridge in a sparsely populated area. INDOT believes that the pedestrian usage of the existing bridge would be minimal and provide little value to the general public as a historic site compared to its potential use at other locations. At a December 4, 2014 meeting with consulting parties, a request was made to INDOT to conduct outreach to Clay County and the public to determine the level of interest in retaining the bridge in its current location. On January 29, 2015, INDOT held a public meeting in Bowling Green to provide an overview of the project, including the bridge's condition, the alternatives under consideration, and the potential to relocate the bridge to Brown County. The deadline for a party to step forward and take responsibility for the bridge will extend to the time of the project's public hearing, currently anticipated for the first week of August 2015. The final decision regarding the preferred alternative and/or the future location of the existing bridge will not be made before that time. However, to date, no parties have stepped forward to take responsibility for the structure and retain it in place.

At the Salt Creek Trail location, there is a strong demand for a pedestrian facility. It is anticipated that on the Salt Creek Trail, the span to be located adjacent to SR 46 at Eagle Park would be owned and maintained by Brown County, while the span located within Brown County State Park would be owned and maintained by DNR. Each party will be required to sign an agreement committing to maintain their respective structures for a minimum of 25 years. However, it is anticipated that, based on the expected visitation levels, the bridges would be retained far beyond that minimum. DNR and Brown County have each submitted a letter of intent to take responsibility for the bridge spans.

It should also be noted that an approach that would keep the two spans together as part of the Salt Creek Trail was evaluated; however, the topography, hydraulic conditions, and presence of wetlands in the area, make that option impractical. Preliminary investigations confirmed that using the spans at two separate locations was the only practical option.

Based on coordination with your colleagues in the Environmental Review section, there is concern that relocation of the trusses would result in their immediate removal from the National Register. There is also concern that, because the bridge is listed under Criterion A for its transportation significance in the settlement and development of Clay County, that its relocation to another county would make it ineligible for continued listing. As such, your colleagues asked that INDOT initiate a two-fold request to your office: (1) that the bridge also be considered eligible under Criterion C based on its engineering significance and (2) that the bridge keep its National Register listing during and following any relocation. This letter and its attachments serve as that request.

Please find attached two sets of documents that address the two aspects of National Register listing discussed above. The first packet of information includes National Register continuation pages that we think make the case for Criterion C eligibility. The second packet of information includes the request to retain National Register listing of the bridge during and following the proposed relocation to Brown County. Upon your concurrence with this information, we request that both sets of information be submitted to the Indiana Historic Preservation Review Board ("Review Board") for approval at their July 22, 2015 meeting to then be forwarded to the Keeper of the National Register in the National Park Service.

We look forward to your review of the attached information. We eagerly await your recommendation as to whether you think that Bridge No. 046-11-01316C is eligible for listing in the National Register under Criterion C in addition to its current listing under Criterion A, and whether you think the bridge may remain listed in the National Register during and after a proposed move to Brown County.

Due to the urgent need for a permanent solution for the bridge at its current location, we are happy to meet with you at your convenience should you have any questions about the attached information. To keep our current project schedule for this very important project, submittal to the Review Board for approval at their July 22, 2015 is imperative. We are ready and willing to make any suggested edits to the enclosed documents that you feel are necessary before submittal to the Review Board as soon as you relay them to us. We truly appreciate your assistance on this matter. If you have any questions, please do not hesitate to contact Mary Kennedy of my staff at 317-232-5215 or mkennedy@indot.in.gov.

Sincerely,



Patrick Carpenter, Manager
Cultural Resources Office
Environmental Services

PAC/MEK/mek
Enclosure

cc: ES project files

emc: Des. No. 0800910 Consulting Parties
Tony Jones, INDOT
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Larry Heil, FHWA
Dan Prevost, Parsons
Sean Porter, Parsons