



State of Utah

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DEPARTMENT OF TRANSPORTATION

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June 30, 2015

Mr. P. Bradford Westwood
Utah State Historic Preservation Officer
Utah Division of State History
300 Rio Grande
Salt Lake City, Utah 84101

RE: Recognition of Eligibility Determinations and Evaluation Criteria in the Utah Historic Bridge Inventory, Completed June 30, 2011

Dear Mr. Westwood,

In accordance with the *Second Amended Programmatic Agreement among the Federal Highway Administration, the Utah Department of Transportation, the Utah State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Section 106 Implementation for Federal-Aid Transportation Projects in the State of Utah* (executed April 16, 2010), and in accordance with *The Programmatic Agreement between the Utah Department of Transportation and the Utah State Historic Preservation Officer Regarding Implementation of U.C.A. 9-8-404 for State-Funded Transportation Projects in Utah*, the Utah Department of Transportation (UDOT) requests the recognition of the eligibility determinations and the evaluation criteria of structures, defined as bridges and culverts, included in the *Utah Historic Bridge Inventory* (herein referred to as the "inventory") prepared for the UDOT. The findings of the inventory are to be used in consultation between the UDOT and the Utah State Historic Preservation Office (USHPO). This correspondence describes the content of the inventory, the methodology undertaken to conduct the inventory and the applicability of the inventory to consultation between the two agencies pertaining to structures.

Background

In June 2011, the UDOT completed the *Utah Historic Bridge Inventory*. The purpose of the inventory is to assist UDOT in its compliance with major federal preservation laws, specifically the National Historic Preservation Act of 1966, affecting the management of structures for which UDOT has responsibility. The inventory will also assist UDOT in compliance with U.C.A. 9-8-404 of the Utah Antiquities Act.

The inventory addressed bridges and culverts included in the UDOT Structures inventory (herein known as "the Structures inventory"), a database maintained by UDOT to track the condition and maintenance history on bridges and culverts twenty feet or greater that carry vehicular traffic on the Interstate Highway system, and state and county roads. Information regarding individual structures was procured through a file survey of the UDOT Structures inspection reports and photographs, rather than a field survey. Because the UDOT inspects the structures in its inventory every two years, the photographs and notes regarding the condition of the structures are recent enough to suffice in determining their eligibility, and thus saved the UDOT considerable expense in the production of the *Utah Historic Bridge Inventory*.

Contents of the Inventory

The inventory consists of three major parts. The first part is a statewide context that focuses on national and statewide events and trends that shaped highway and bridge construction in Utah during the period from statehood through 1965. It is divided into two periods: pre-war (statehood through 1945) and post-war (1947 through 1965; no bridges were built in Utah in 1946). The pre-war section of the context builds upon a previous historic overview completed for the UDOT prepared by Clayton Fraser of Fraser Design, a draft of which was submitted to the UDOT on November 7, 1997. The context also includes an analysis of bridge types found in Utah during the study period. The themes shaping bridge design and construction provide the framework for evaluating bridges and culverts in the Structures inventory for eligibility for the National Register of Historic Places. The context does not address local roadway development and local bridge design. The Utah SHPO was involved in the review process of the context preparation.

The second part of the bridge inventory consists of evaluation criteria with which to determine the eligibility of structures to the National Register. The structures were evaluated in the inventory against two of the four National Register criteria:

- *Criteria A: Events – Properties that are associated with events that have made a significant contribution to the broad patterns of our history; and*
- *Criteria C: Design/Construction – Properties 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 significance and distinguishable entity whose components may lack individual distinction.*

Criteria B and D generally do not apply to bridges.

The structures were evaluated within the National Park Service guideline that a property be at least fifty years old to establish eligibility. The UDOT, however, generally uses a 45-year period to accommodate the length of time needed to complete environmental studies and secure funding for construction. Structures built through 1965 met the 45-year period at the conclusion of the inventory in 2011.

The third part of the inventory consists of the eligibility evaluations of individual structures. The evaluations are presented on site forms that provide a photo, the evaluation, and other pertinent information about each bridge. A summary of the number of bridges and culverts and their eligibility evaluations is included in the table below:

Pre-War Bridges Surveyed: 210	Post-War Bridges Surveyed: 409
<ul style="list-style-type: none">• 38 eligible<ul style="list-style-type: none">○ 14 eligible under NR Criterion A○ 24 eligible under NR Criterion C○ 7 eligible under both NR Criteria A & C	<ul style="list-style-type: none">• 31 eligible<ul style="list-style-type: none">○ 7 eligible under NR Criterion A○ 24 eligible under NR Criterion C○ 1 eligible under both NR Criteria A & C

Numbers pertain to conclusion of inventory on June 30, 2011.

While Interstate Highway system development was addressed as a theme in the context, structures carrying the Interstate Highway were excluded from the inventory. They have been previously evaluated for the National Register in accordance with Section 6007 of the *Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users* (SAFETEA-LU). In Utah, no Interstate Highway

structures were determined to be eligible for the National Register and no structures were included in the FHWA's *Final List of Nationally and Exceptionally Significant Features of the Federal Interstate Highway System*.

Application of the Inventory to Federal and State Structures Projects

The inventory should be referred to for consultation between the UDOT and the USHPO for federally- and state-funded undertakings affecting bridges and culverts. In most cases, structures built prior to 1966 are included in the inventory, and have been evaluated in accordance with the *National Register Criterion for Evaluation* described in Volume II of the inventory. Therefore, the UDOT shall rely on the National Register determinations specified for individual structures in the inventory and will use the description of character-defining features to determine the category of effect as the basis for consultation with USHPO.

In addition to relying on the eligibility determinations established for individual bridges in the inventory, UDOT will apply the National Register Criterion for Evaluation described in Volume II of the inventory in the following instances:

- For the evaluation of structures found in the Utah Division of State History's Preservation Pro database whose eligibility was determined prior to the completion of the inventory, and were thus not evaluated using the criterion described in Volume II of the inventory.
- For the evaluation of structures that are not in the UDOT Structures Inventory, including minor structures (less than 20 feet in length), structures on county roads, and out-of-service structures.
- For the evaluation of structures listed on the National Register, either individually or as part of a district, whose physical integrity has substantially diminished since its listing.
- For the evaluation of structures built after 1965 but are 45 years or older. A review of the UDOT Structures inventory reveals that almost all structures built after 1965 fall into the categories identified in the Advisory Council on Historic Preservation Program Comment list, released in 2013, for common post-1945 concrete and steel bridges and culverts. These common types include various forms of reinforced concrete slab bridges, reinforced concrete beam and girder bridges, steel multi-beam bridges or multi girder bridges, and culverts and reinforced concrete boxes. The bridges addressed in the Program Comment are considered well-documented standardized designs that lack individual distinction. The ACHP Program Comment recognizes that these common bridge types are ineligible for the National Register, owing to the fact that they do not represent a transition, a rare type, or the work of a master because of their ubiquity, and that they are well-documented standardized designs lacking individual distinction.

Few structures included in the Structures inventory database constructed after 1965 fall outside of the Program Comment structures types. In the event that UDOT proposes an undertaking that might affect the structures not included in the Program Comment but constructed after 1965, they would be evaluated against the eligibility criterion described in Volume II, provided they were at least 45 years old or met the National Register Criteria Consideration G: *Properties that Have Achieved Significance Within the Past Fifty Years*.

Objections

If the UDOT and the USHPO disagree on the determination of eligibility or finding of effect for a structure, the UDOT Architectural Historian and the USHPO staff will work to resolve the difference,

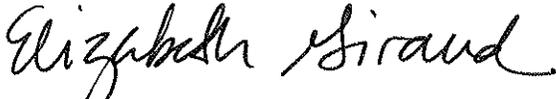
following the procedures identified in the existing Section 106 or 9-8-404 agreements, whichever is applicable. If the objection is resolved through consultation, the proposed undertaking will continue to proceed through the Section 106 or 9-8-404 process. If the objection cannot be resolved through consultation between the two agencies, the UDOT shall proceed pursuant to the procedures identified in the existing Section 106 or 9-8-404 agreements, whichever is applicable.

Summary

Through the study of historical associations and the physical features that impart the identity for which individual structures are significant, *the UDOT Historic Bridge Inventory* identified structures that are eligible for the National Register under Criterion A and C. This agreement describes the background of the inventory and establishes the applicability of the inventory to consultation between the UDOT and USHPO when the UDOT proposes undertakings that may affect bridges and culverts in Utah.

If you have further questions regarding this agreement, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Giraud". The signature is written in a cursive style with a large, prominent initial "E".

Elizabeth Giraud
UDOT Architectural Historian

Regarding the recognition of eligibility determinations and evaluation criteria in the *Utah Historic Bridge Inventory*, completed June 30, 2011, I concur that the inventory provides the appropriate context, individual evaluations, and National Register criteria by which to comply with the National Historic Preservation Act (NHPA) of 1966 and the Utah Antiquities Act (U.C.A. 9-8-404).



P. Bradford Westwood, Utah State Historic Preservation Officer

July 07, 15
Date