TALMAGE NORTH BRIDGES
12974A - STP-67-2(109)
Otoe County, Nebraska

1.0 INTRODUCTION

This Historic Bridge Treatment/Alternatives Evaluation is being provided in association with the Nebraska Department of Roads (NDOR) Talmage North Bridges Project (Project) and in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA) and Section 4(f) of the U.S. Department of Transportation Act of 1966 (Section 4(f)). The Project would remove and replace bridge structures located over the North Fork of the Little Nemaha River (Little Nemaha River bridge [structure no. S067 05206 / NeHBS No. OT05-011][1]) and one of its tributaries on Nebraska Highway 67 (N-67) in Otoe County, Nebraska (S067 05312). Talmage North is an NDOR companion project (Project Number RD-67-2(1005), Control Number (CN) 12974) for improving the N-67 roadway on either side of the bridges[2]. The bridge project would involve improvement of approaches within 300 feet of the bridges, and the roadway project would improve the roadway outside of the approaches.

The purpose of this Project is to preserve the transportation asset, improve the reliability of the transportation system, and perpetuate the mobility of the traveling public. The Project is needed to address existing bridge deficiencies identified by NDOR's Bridge Division, Bridge Inventory and Rating System, District 1, and biennial inspections.

One of the two bridges, the Little Nemaha River bridge (S067 05206), is eligible for listing on the National Register of Historic Places (NRHP); structure S067 05312 is not eligible for listing on the NRHP.

2.0 BACKGROUND

2.1 Nebraska Historic Bridge Inventory and Management Plan

Historic bridges are protected under Section 106 of the NHPA and are subject to Federal Highway Administration (FHWA) Section 4(f) requirements. Priorities for review parameters regarding Section 106 of the NHPA evaluation of historic bridges in Nebraska were established under the *Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation and the Nebraska State Historic Preservation Officer for the Highway Bridge Replacement and Rehabilitation Program* (PA) in 1991. While that PA has expired, it is still used for evaluation of historic bridges; it required the development of the *Nebraska Historic Bridge Inventory* and *Historic Bridge Management Plan* (FraserDesign and Hess, Roise and Company 1991). The PA, inventory, and management plan helped to establish a firm foundation for the consideration of historic bridges in

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[1] Bridge and Project documentation typically only reference structure number (S067 05206). The NeHBS No. (OT05-011) refers to the number assigned to the structure from the historic bridge survey.

[2] Improvements include trench widening two feet left and right (one foot asphalt and one foot earth), resulting in a 24-foot wide surfaced top between mile marker (MM) 51.66 and MM 52.66 (including approaches to the S067 05206 bridge).

Nebraska and established priorities for the treatment of historic bridges. The bridge inventory is updated periodically, in accordance with the PA, and was most recently updated in 2007 (Mead and Hunt 2007).

The *Nebraska Historic Bridge Inventory* and *Historic Bridge Management Plan* (FraserDesign and Hess, Roise and Company 1991) includes the following priorities for treatment of historic bridges:

1. The preferred treatment for a historic bridge is to have it continue to carry vehicular traffic at its original site with minimal modification.
2. If it is not feasible to keep the bridge at its original site, every effort should be made to find an appropriate site to which it could be relocated for vehicular use.
3. If it is determined that the bridge can no longer carry vehicular traffic, or could do so only at the expense of its historic integrity, the next best solution is to retain it for nonvehicular use at its original site with minimal modification. Priority should be given to transit-related uses, such as serving bicycle and pedestrian traffic.
4. If the bridge can no longer carry vehicular traffic, no "as is" use is feasible, and cannot be left in place, adaptive use possibilities should be explored, with preference to reuses that retain the bridge at its original site. Necessary modifications should not damage or obscure the original bridge structure. If no suitable in situ adaptive use can be found, the bridge can be closed to vehicular traffic and left in place as a "moldering ruin".
5. If the bridge cannot remain on its original site and cannot be moved, it shall be documented to the standards of the Historic American Engineering Record before demolition, disassembly or modifications that will destroy its historic integrity. If possible, the structure should be disassembled carefully and stored until a new location for it can be found or significant components should be incorporated into any new bridge at the site or salvaged for educational purposes.

2.2 Bridge Eligibility

In April 2007, 1,405 bridges constructed in Nebraska between 1947 and 1965 were evaluated for their eligibility for listing on the NRHP in the *National Register Evaluation of Nebraska Bridges 1947 to 1965* (Mead and Hunt 2007). During this comprehensive evaluation, the Little Nemaha River bridge (S067 05206), a Pratt Overhead Truss bridge, was recommended eligible for listing on the NRHP under Criterion C of NRHP Criteria for Evaluation. Criterion C is defined in the National Park Service's *How to Apply the National Register Criteria for Evaluation* (1997) as follows:

Criterion 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 significant and distinguishable entity whose components may lack individual distinction" (NPS 1997).

Criterion C recognizes bridges that have distinctive design or construction characteristics that demonstrate the following: 1) "the pattern of features common to a particular class of resources"; 2) "the individuality or variation of features that occurs within the class"; 3) "the evolution of that class" of resources; and/or 4) "the transition between classes of resources" (NPS 1997). Most bridges will be evaluated under Criterion C because their significance involves design and construction.

The Little Nemaha River bridge is a 192-foot-long steel through-truss bridge constructed in 1951. The historic bridge evaluation (Mead and Hunt 2007) determined that the bridge is recommended eligible for listing on the NRHP under Criterion C "as a long example of the rigid-connected (riveted) Pratt

through-truss type with a skewed portal,[3] which is a special engineering design feature." In addition, the span or structure length of this structure indicates exceptional engineering for the site and the skewed portal is a "significant engineering variation" that "pushes the design to its maximum limit" (Mead and Hunt 2007).

Project specific identification and evaluation of cultural resources within the area of potential effects was completed in June 2015. Consistent with the *National Register Evaluation of Nebraska Bridges 1947 to 1965* (Mead and Hunt 2007), the Project-specific survey recommended that the Little Nemaha River bridge is eligible for listing on the NRHP (NDOR 2015a).

Based on the eligibility recommendation, the character defining features of the Little Nemaha River bridge's historic significance are:

- Rigid (riveted) Pratt through truss
- Skewed portal
- Span length

Photographs of the bridge have been included at the end of this Historic Bridge Treatment/Alternatives Evaluation and show the truss structure, skewed portal, and span length. Preservation of, or impacts on, these character defining features are the primary consideration related to this Historic Bridge Treatment/Alternatives Evaluation.

2.3 Bridge Condition

The Little Nemaha River bridge (S067 05206) received its most recent biennial/fracture critical inspection in July 2014. The bridge was determined to be both structurally and functionally deficient, as discussed below. Continued use of the bridge for vehicular traffic at either its existing location or an alternate location would require that both of these deficiencies be addressed.

Structural Deficiencies

In association with the July 2014 National Bridge Inventory (NBI) biennial/fracture critical inspection, the Little Nemaha River bridge was determined to be structurally deficient and given a sufficiency rating of 38.7.[4] The bridge deck and substructure[5] were assigned an NBI rating of fair,[6] while the superstructure[7] and channel were rated poor.[8] Specific observations from the inspection report include the following:

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[3] The portal is a combination of struts and ties at the entrance to a truss bridge serving to transfer wind pressure from the upper parts of the trusses to a support abutment or pier of the bridge.

[4] FHWA defines the sufficiency rating of a bridge as "the numerical rating of a bridge based on its structural adequacy and safety, essentiality for public use, and its serviceability and functional obsolescence" (23 Code of Federal Regulations [CFR] 650.403). The rating is used as a basis for establishing eligibility and priority for replacement or rehabilitation of bridges; in general, the lower the rating, the higher the priority.

[5] Substructure refers to the bridge's piers and abutments.

[6] The NDOR Bridge Inspection Program Manual (NDOR 2011) describes "Fair Condition" as: "all primary structural elements are sound but may have minor section loss, cracking, spalling or scour"

[7] Superstructure refers to all bridge components located above the piers and abutments and the bridge floor framing system and truss members.

[8] The NDOR Bridge Inspection Program Manual (NDOR 2011) describes "Poor Condition" as: "advanced section loss, deterioration, spalling or scour."

1. There is corrosion and delamination of the underside of the deck (deck concrete separating from the reinforcing bars) from several years of leakage and inadequate floor drains
2. There are areas of section loss (including holes through some steel members) and corrosion damage to the lower portions of steel truss members and the floor framing system
3. There has been damage to the portal bracing caused by collisions with traffic
4. The steel piling is in poor condition due to corrosion from the presence of moisture in the embankment.
5. The river banks are nearly vertical with erosion of the abutment berms and scour along both banks. There are erosion ditches at the southwest and northeast abutment corners.

Overall, this structure rated low and deficient, therefore it is deemed structurally inadequate to handle future traffic demand and was determined to be structurally deficient. In addition, the existing steel truss bridge structure is designed for an H15-44 truck, and newer trucks are longer and heavier than an H15-44 truck.

Functional Deficiencies

The existing bridge width (curb-to-curb) of 22 feet does not meet the Minimum Design Standard (MDS) of 24 feet for bridges to remain in place on a Resurfacing, Restoration and Rehabilitation (3R) project[9] nor does it meet the DR-5 MDS [10] of 36 feet for a new or reconstructed bridge longer than 200 feet. In addition, the existing truss does not provide for adequate vertical clearance, based on the frequency of impact on portal bracing that has been documented in the bridge inspection reports, and is a hazard and impediment to trucks.

2.4 Public Input

On June 11, 2015, from 4 p.m. to 6 p.m., NDOR held an open house public information meeting at the Talmage Community Center, located at 404 Main Street in Talmage, Nebraska. This meeting was announced via NDOR standard public involvement methods contained within the NDOR Public Involvement Procedure (2015b).

Thirty-five members of the public signed the public information meeting sign-in sheet. Eight formal comments were submitted via public comment form. Additional public sentiment was orally conveyed to meeting staffers and appropriately documented. No citizens expressed concern related to the historic bridge or its preservation.

3.0 PRIORITIES FOR TREATMENT OF HISTORIC BRIDGES

The priorities for treatment of historic bridges listed in the *Nebraska Historic Bridge Inventory* and *Historic Bridge Management Plan* (FraserDesign and Hess, Roise and Company 1991) were evaluated with respect to the historic Little Nemaha River bridge (S067 05206), as detailed below. The below information has been summarized for this document, however, the report can be found in its entirerty in the Alternatives Analysis which can be available upon request.

"The preferred treatment for a historic bridge is to have it continue to carry vehicular traffic at its original site with minimal modification".

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[9] Clear roadway width (curb-to-curb) MDS for bridges on rural state highways is 24 feet for bridges to remain in place.

[10] DR-5 MDS apply to state highways with Average Daily Traffic (ADT) between 400 and 1,999 vehicles per day. Projected year 2033 ADT for the Little Nemaha River bridge is 1,312 vehicles per day.

Because the Little Nemaha River bridge (S067 05206) is both structurally deficient and functionally obsolete, continued use of the bridge for vehicular traffic at its existing location would require that these deficiencies be addressed.

The structural deficiencies of the bridge superstructure can only be addressed by extensive repair of the steel truss members and floor framing system to address the corrosion and section loss to the structural steel. These repairs would include replacement of some truss members, requiring removal of rivets, which are a character defining feature, as well as reinforcement of other members using bolts or welds, adversely affecting the aesthetic character of the truss, which is another character defining feature.

Deficiencies associated with the channel would require replacement of the abutments and extension of the bridge, to address the vertical river banks, scour and erosion ditches at the abutments. The only way to extend truss bridges is to construct additional spans adjacent to the truss. Extension of the bridge in this manner would circumvent the intent of using a long-span Pratt through truss at this crossing and thus would adversely affect the character defining feature of the bridge as a long example of the Pratt through truss.

In additional to being structurally deficient, the Little Nemaha River bridge is functionally obsolete, with substandard width and height. The bridge width (curb-to-curb) of 22 feet does not match the width of the planned approach roadway surface nor does it meet current safety requirements. Additionally, the vertical clearance of 14 feet 10 inches does not meet current MDS. To address the functional deficiencies related to the narrow bridge width and the low overhead clearance to the portal bracing, extensive reconstruction of the bridge superstructure would be required. To meet current width standards, the truss would have to be disassembled to replace portal bracing members to widen the bridge, requiring that a substantial number of rivets, which are a character defining feature, be removed. It is not possible to increase the vertical clearance without replacing or substantially modifying the overhead bracing of the truss, thus destroying the character defining feature of the truss as well as the skewed portal. Finally, widening the roadway width of the bridge would add additional load to the existing truss members both from the added weight of the wider bridge deck and the added weight of vehicles that could fit on the widened roadway. As a result, the truss members would need to be strengthened or replaced, thus destroying character defining features.

Given its structural deficiencies and functional obsolescence, the Little Nemaha River bridge (S067 05206) is not suitable for continued use for vehicular traffic in its current location. Continued use of the structure would require appreciable modifications to the existing structure that would destroy the features that make it eligible for listing on the NRHP under Criterion C resulting in loss of the historic integrity of the structure.

“If it is not feasible to keep the bridge at its original site, every effort should be made to find an appropriate site to which it could be relocated for vehicular use”.

As noted in the previous treatment discussion, the Little Nemaha River bridge (S067 05206) is both structurally deficient and functionally obsolete. Extensive repairs would be required of the steel truss members and floor framing system to address the corrosion and section loss to the structural steel. To address the functional deficiencies related to the narrow roadway width of the bridge deck and the low overhead clearance to the portal bracing, extensive reconstruction of the bridge superstructure would be required. Widening the bridge and increasing the vertical clearance would result in the loss of the character defining features of the bridge’s historic significance and subsequent loss of historic integrity, thus rendering the bridge no longer eligible for listing on the NRHP under Criterion C.

Furthermore, relocation of the bridge for vehicular traffic is not a feasible treatment because, in addition to the structural repairs noted above, moving the bridge would require disassembling it by removing the rivets, which are a character defining feature.

"If it is determined that the bridge can no longer carry vehicular traffic, or could do so only at the expense of its historic integrity, the next best solution is to retain it for non-vehicular use at its original site with minimal modification. Priority should be given to transit-related uses, such as serving bicycle and pedestrian traffic".

Use of the Little Nemaha River bridge (S067 05206) for non-vehicular use was evaluated with consideration of both public and private ownership. For the reasons detailed below, it is unlikely that bridge reuse under any ownership scenario would be feasible or reasonable.

- Public Ownership – On-site observation and review of the Nebraska Game and Parks Commission's "Nebraska Trail System: Interactive Map" identified no existing public pedestrian or bicycle trails along N-67 within or adjacent to the Project Limits (NGPC 2016). Furthermore, no planning documents have been identified that define plans for future trail development along N-67. Therefore, the existing structure would not support existing or planned transit-related uses in its current location.
- Private Ownership – No opportunities for private ownership have been identified. Only one utility, an 8-inch-diameter water line owned by the Otoe County Rural Water District, is attached to the lower chord of the south side of the truss and could be relocated if the bridge is reconstructed. Continued use of the existing Little Nemaha River bridge solely to carry this water line is not economically feasible. NDOR coordinated with the Otoe County Rural Water District, who indicated that they would shut the water off and the water line can be disconnected during bridge removal.[11] Additionally, the width of the North Fork of the Little Nemaha River would readily be traversed by standard overhead utility crossings or subsurface borings.
- Bridge Condition – Regardless of potential public or private ownership opportunities, the deteriorated condition of the bridge channel (rated poor) is not conducive to continued use of the Little Nemaha River bridge for vehicular or alternate uses unless the channel deficiencies are addressed. Addressing these deficiencies would adversely affect the historic integrity of the bridge, as discussed previously.

"If the bridge can no longer carry vehicular traffic, no 'as is' use is feasible, and cannot be left in place, adaptive use possibilities should be explored, with preference to reuses that retain the bridge at its original site. Necessary modifications should not damage or obscure the original bridge structure. If no suitable in situ adaptive reuse can be found, the bridge can be closed to vehicular traffic and left in place as a 'moldering ruin'".

As noted in the previous treatment discussion, the Little Nemaha River bridge (S067 05206) is both structurally deficient and functionally obsolete in its existing location. Continued use of the bridge for less demanding uses in either its original location or an alternate location would still require that the identified deficiencies be addressed, which would necessitate structural changes that would destroy the character defining features that make the bridge eligible for listing on the NRHP under Criterion C. Furthermore, as discussed above, relocation of the bridge for non-vehicular use is not a feasible treatment because it would require disassembly of the bridge truss and removal of the rivets, which are a character defining feature); additionally, finding an adaptive site with the same span as well as skew characteristics is very unlikely.

Finally, it is not feasible to leave the bridge in place as a moldering ruin because any new bridge would require a longer span and the existing bridge abutments would not align with the new bridge substructure and would adversely affect river hydraulics.

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[11] April 9, 2015, meeting between NDOR designers Rich Geschwender and Kevin Krowlikowski with Ed Rowan of the Otoe County Rural Water District.

"If the bridge cannot remain on its original site and cannot be moved, it shall be documented to the standards of the Historic American Engineering Record before demolition, disassembly or modifications that will destroy its historic integrity. If possible, the structure should be disassembled carefully and stored until a new location for it can be found or significant components should be incorporated into any new bridge at the site or salvaged for educational purposes".

Restoration or rehabilitation of the Little Nemaha River bridge (S067 05206) for vehicular or non-vehicular use that preserves the bridge's historic character is not feasible for the reasons identified above. Furthermore, the relocation of the bridge would result in destruction of the character defining features of the bridge. For these reasons, bridge demolition (or repair of the existing structure in a manner that would destroy its historic integrity) is the preferred treatment and the PA requirement to market the bridge to potential new owners for possible reuse does not apply. Recordation of the bridge using Historic American Engineering Record guidelines would be conducted prior to demolition and would preserve the bridge's historic elements through documentation.

4.0 SECTION 4(F) FINDINGS

The preceding alternatives analysis for treatment of the Little Nemaha River bridge (S067 05206) also addresses the alternatives analysis required under the "Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges" (Programmatic Evaluation) (FHWA 1983). The following details the findings of the alternatives analysis, as specified in the Programmatic Evaluation: "there are no feasible or prudent alternatives" that perpetuate the historic integrity of the Little Nemaha River bridge (S067 05206):

1. "Do Nothing". The Do Nothing alternative has been studied. The Do Nothing alternative ignores the [Project's] basic transportation need, which is to address the structural deficiencies and functional obsolescence of the bridge structure. This alternative is not feasible and prudent for the following reasons:

   The Do Nothing alternative does not correct the situation that causes the bridge to be considered structurally deficient or deteriorated. These deficiencies can lead to potential injury or loss of life. Normal maintenance is not considered adequate to cope with the situation because the structural deficiencies of the bridge superstructure can only be addressed by extensive repair of the steel truss members and floor framing system to address the corrosion and section loss to the structural steel.

   In addition to being structurally deficient, the Little Nemaha River bridge is functionally obsolete. The bridge width (curb-to-curb) of 22 feet does not match the proposed width of the approach roadway surface included in the Talmage North project (CN 19274) proposed to improve this section of N-67 nor does it meet the MDS of 24 feet for bridges used in place.

   For these reasons, the Do Nothing alternative does not correct the situation that causes the bridge to be considered deficient. Because of these deficiencies, the bridge poses serious and unacceptable safety hazards to the traveling public or places intolerable restriction on transport and travel.

2. "Build on New Location Without Using the Old Bridge". Project investigations have determined that it is neither feasible nor prudent to construct a replacement bridge on a new location (or parallel to the existing bridge) while preserving the Little Nemaha River bridge.

   The Little Nemaha River bridge is beyond rehabilitation for a transportation or alternate use and no responsible party has been identified as willing to maintain and preserve the bridge for an alternative use. As discussed above, this bridge is structurally deficient and functionally obsolete. Continued use of the bridge for either existing vehicular traffic or less demanding vehicular

traffic would require that the identified deficiencies be addressed; this would necessitate structural changes that would destroy the character defining features that make this bridge eligible for listing on the NRHP under Criterion C.

Use and preservation of the Little Nemaha River bridge for non-vehicular traffic was investigated with consideration of both public and private ownership:

- Public Ownership and Preservation – On-site observation and review of the Nebraska Game and Parks Commission's "Nebraska Trail System: Interactive Map" identified no existing public pedestrian or bicycle trails along N-67 within or adjacent to the Project Limits (NGPC 2016). Furthermore, no planning documents have been identified that define plans for future trail development along N-67. Therefore, the existing structure would not support existing or planned transit related uses in its current location.
- Private Ownership and Preservation – No opportunities for private ownership have been identified. Only one utility, an 8-inch-diameter water line owned by the Otoe County Rural Water District, is attached to the lower chord of the south side of the truss and could be relocated if the bridge is reconstructed. Continued use of the existing Little Nemaha River bridge solely to carry this water line is not economically feasible.

Finally, it is not feasible or prudent to leave the existing bridge structure in place as a moldering ruin because:

- Any new bridge would require a longer span and the existing bridge abutments would not align with the new bridge substructure and would adversely affect river hydraulics in a flood.
- The existing bridge would no longer serve a transportation purpose and would not be maintained; therefore, the bridge would continue to deteriorate and would eventually fail.
- If the existing bridge is left in place and a new bridge constructed, both bridges would be within the floodplain of the North Fork Little Nemaha Bridge and represent additional risk during a flood.

3. "Rehabilitation Without Affecting the Historic Integrity of the Bridge". Studies have been conducted of rehabilitation measures, but, for the following reasons, this alternative is not feasible and prudent:

   The bridge is so structurally deficient that it cannot be rehabilitated to meet minimum acceptable load requirements without affecting the historic integrity of the bridge, as discussed above. More specifically, the bridge truss members and floor framing system are deteriorated to the point where they require extensive repair to address the corrosion and section loss to the structural steel. These repairs would include replacement of some truss members, requiring removal of rivets, a character defining feature, as well as reinforcement of other members using bolts or welds, adversely affecting the aesthetic character of the truss, another character defining feature.

   The bridge is seriously deficient geometrically and cannot be widened to meet the minimum required capacity of the highway system on which it is located without affecting the historic integrity of the bridge. More specifically, the bridge width (curb-to-curb) of 22 feet does not match the proposed width of 24 feet for the approach roadway surface included in the Talmage North project (CN 12974) proposed to improve this section of N-67; nor does it meet the MDS of 24 feet for bridges used in place.

   No feasible and prudent alternative was identified that could maintain the existing bridge for vehicular traffic. Therefore, the Project would result in a direct use of the Little Nemaha River bridge (S067 05206), as defined in Section 4(f).

5.0 MEASURES TO MINIMIZE HARM

In accordance with the Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges (FHWA 1983), the Project includes all possible planning to minimize harm. The Project requires the replacement of the Little Nemaha River bridge (S067 05206). Additionally, because alternative uses are not feasible, the bridge would not be marketed to other users. Finally, fully adequate recordation of the historic bridge would be completed prior to demolition.

The result of the Section 106 of the NHPA consultation is a Memorandum of Agreement (MOA) signed by the Nebraska State Historical Preservation Officer and FHWA, with NDOR as a concurring party. The MOA contains a requirement for documentation of the bridge prior to demolition or repair, and is in compliance with the *Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation, and the Nebraska State Historic Preservation Officer for the Highway Bridge Replacement and Rehabilitation Program* (FHWA 1991). The level of recordation and specifics of what would be accomplished in the recordation are identified in the MOA.

On April 12, 2016 the Advisory Council decided that they did not want to participate in the MOA, however, they did request a copy of the final MOA. The MOA was signed by the NSHS on May 10, 2016, by the NDOR on May 11, 2016 and by the FHWA on May 13, 2016. The Executed MOA was filed with the Adviosry Council on June 1, 2016, and they acknowledged receipt of the Executed MOA on June 17, 2016. The Section 106 Consultation has been been completed.

6.0 SUMMARY

All avoidance treatments and alternatives would require replacement or substantial repair or modification of the existing Little Nemaha River bridge (S067 05206) truss design and exceptional engineering elements, which are considered the character defining features of the bridge's historic significance. The loss of the character defining features of the bridge's historic significance and subsequent loss of historic integrity would render the bridge no longer eligible for listing on the NRHP.

NDOR recommends this project qualifies for the Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges (FHWA 1983) to this action and hereby request concurrence from the FHWA by signature below.

Jon C Barber

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Date: 2016.07.29 14:33:13 -05'00'

Jon C. Barber Date

NDOR, Environmental Documents Unit Manager

FHWA concurs that these activities of the proposed project meet the criteria for the Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges (FHWA 1983).

Scott H. Stapp

Digitally signed by Scott H. Stapp
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FHWA, Environmental Protection Specialist