



U.S. Department of Transportation  
**Federal Highway Administration**

**Finding of No Significant Impact**

## **Monument Place Bridge**

State Project No.: S235-40-6.65 00 Federal  
Project No.: STP-0040(049)D

Ohio County, West Virginia

May  
**2019**



MONUMENT PLACE BRIDGE  
OHIO COUNTY, WV

WVDOT STATE PROJECT NO.: S235-40-6.65 00  
FEDERAL PROJECT NO.: STP-0040(049)D

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

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## 1 INTRODUCTION

This document provides the basis for a determination by the Federal Highway Administration (FHWA) of a Finding of No Significant Impact (FONSI) for the proposed replacement of the Monument Place Bridge Project. This determination is made in accordance with the National Environmental Policy Act of 1969 (NEPA); the Council on Environmental Quality's (CEQ) implementing regulations for NEPA (40 CFR §1500-1508), FHWA's implementing regulations for NEPA (23 CFR §771), U.S. Department of Transportation (USDOT) FHWA guidelines (Technical Advisory T 6640.8A, October 30, 1987 – *Guidance for Preparing and Processing Environmental and Section 4(f) Documents*), the Fixing America's Surface Transportation Act (FAST) (Public Law 114-94, December 4, 2015, 129 Stat. 1312), and related guidance.

The West Virginia Department of Transportation (WVDOT), in cooperation with FHWA, prepared the Environmental Assessment (EA) and Programmatic Section 4(f) and Section 106 Evaluation (of the National Historic Preservation Act). These documents describe potential adverse effects on the human and natural environment and the integrity of historic resources that may result from the proposed project. The EA was prepared pursuant to 23 CFR § 771 and issued on February 4, 2019. WVDOT prepared this FONSI, which incorporates, by reference, the EA and other cited documentation.

## 2 EXISTING CONDITIONS

The Monument Place Bridge carries US 40 (also known as National Road) traffic over Little Wheeling Creek (Figure 2-1). The Monument Place Bridge is the oldest bridge in West Virginia and is listed on the National Register of Historic Places (NRHP). The stone arch bridge is a unique and rare example of a stone arch that features the elliptical style of arch geometry. The bridge was altered in 1931 when the original parapets were removed and replaced with concrete sidewalks and balustraded parapets that overhang on the bridge and are supported by brackets.

From 1958 to 2014, the exterior of the bridge was covered with a concrete veneer, giving it the appearance of a concrete arch bridge. Over time, portions of the veneer had fallen into Little Wheeling Creek, which exposed the limestone masonry underneath that had suffered a loss of mortar and stone deterioration. The veneer failed to prevent scour or erosion of the bridge supports below the level of the creek, and the scour undermined an abutment and two bridge piers. The sidewalk overhangs and support brackets showed extensive deterioration that is notable below the construction joints supporting the sidewalks. This deterioration has resulted in

load limits. Currently, the bridge is posted for weight limit restrictions of 16 tons for single-unit trucks and 32 tons for tractor trailers.

**Figure 2-1: Build Alternative 1**



### 3 PROJECT PURPOSE AND NEED

The purpose of the proposed project is to rehabilitate the Monument Place Bridge over Little Wheeling Creek in order to ensure that US 40 continues to convey vehicular and pedestrian traffic through the unincorporated community of Elm Grove, remains safe for pedestrian and vehicular travel, and maintains the continuity of the local transportation system.

The project is needed because the stone arch bridge is exhibiting signs of deterioration, resulting in weight limits that will decrease as the structure continues to deteriorate.

### 4 ALTERNATIVES CONSIDERED

Two alternatives were developed and evaluated as part of the EA: the No-Build Alternative and Build Alternative 1. Multiple alternatives were developed and evaluated during the Design Study in an Alternatives Evaluation Report. The alternatives included rehabilitation, replacement in the same location, and construction of a new bridge in a different location. The evaluation

concluded with the alternatives that best met the geometric requirements and the purpose and need. A hybrid of the Design Study's Build Alternative 1A and 1B was ultimately selected as the Preferred Alternative (Build Alternative 1 – Rehabilitate Arch).

#### **4.1 No-Build Alternative**

The No-Build Alternative proposes no rehabilitation or replacement of the existing structure. WVDOT will continue to provide maintenance on the structure as it currently does today. The structure is already structurally deficient and is posted for weight restrictions. As deterioration of the structure continues, additional weight restrictions may be imposed, and eventually the structure may need to be closed to all traffic as individual or groups of the main arch stones will become unstable, or scour will threaten the arches where they are supported within the limits of Little Wheeling Creek. The sidewalks also have substantial deterioration and will eventually need to be closed to pedestrian traffic, unless major repairs or modifications are performed. Further, the continued deterioration of the structure will cause its historic integrity to suffer. The maintenance costs (and costs of mandatory repairs) will substantially increase over time as the structure continues to deteriorate, and initial cost savings from not rehabilitating or replacing the structure will quickly erode. The No-Build Alternative would be the least environmentally disruptive alternative; however, the No-Build Alternative does not meet the purpose and need for the proposed project.

#### **4.2 Preferred Alternative (Build Alternative 1)**

Build Alternative 1 involves partial rehabilitation of the existing bridge, and includes removing the existing roadway, sidewalk overhangs, and fill; repairing the foundations and adding scour protection; placing new fill; and constructing a new roadway with sidewalk overhangs. Instead of dismantling the historic stone masonry, the structure will be cleaned and repointed in place. Isolated damaged stones will be replaced where necessary and feasible.

Build Alternative 1 will include the rehabilitation of the structure to support three 12-foot travel lanes (one lane in each direction plus a center left-turn lane) and a 5-foot-wide concrete sidewalk overhang on each side. The existing sidewalks are severely deteriorated, resulting in the outward and downward rotation of the sidewalk and railings. The deteriorated sidewalk will be removed and replaced. New pedestrian barriers with railings and concrete treatment (as necessary to meet historical requirements) will be constructed.

## **5 PUBLIC INVOLVEMENT, AGENCY COORDINATION, AND PUBLIC OPPORTUNITY TO COMMENT**

WVDOT held two informational public workshops and meetings. They were held in an open house format with no formal presentation. Information about the advertising and outreach conducted for the meetings, as well as comments that were received, is included in Appendices A and B.

### **5.1 2012 Public Meeting**

The first public meeting was conducted on May 31, 2012 in the cafeteria of the Bridge Street Middle School (19 Junior Avenue, Wheeling, WV 26003) from 4:00 PM to 7:00 PM. The purpose of the meeting was to introduce the project to the public, describe the alternatives under consideration, and discuss the next steps. Forty-eight people signed in at the public meeting.

WVDOT received 11 formal comments from agencies, organizations, and the public during the 2012 comment period. Of these, over 50% favored Build Alternative 1A or 1B (rehabilitation alternatives). Comments were accepted in writing at the public meeting and also via e-mail, United States mail, and through the project website until July 2, 2012. Appendix A contains all comments received in 2012.

Key issues raised during the 2012 comment period include:

- Preservation of the Monument Place Bridge's historical significance through rehabilitation or preservation
- Economic disruption to local businesses in the Elm Grove's commercial core
- Consideration of a temporary detour roadway between Junior Avenue and WV 88 along the west side of the Bridge Street Middle School property
- The Bridge Street Middle School proposed a new through-roadway for school bus access. This detour option would result in Section 4(f) impacts to the adjacent parkland and, therefore, was not considered further.
- Traffic detour and keeping traffic out of "turning conflict areas" such as Shilling Bridge
- Transparency during the development of the project, and making the public aware of any new developments or information

### **5.2 2019 Public Meeting**

The second public meeting was conducted on March 19, 2019, at Independence Hall (1528 Market Street, Wheeling, WV 26003) from 4:00 PM to 7:00 PM. The purpose of this public

meeting was to present the EA, Section 4(f), and Section 106 Evaluation. A total of 16 people signed in at the public meeting.

WVDOT prepared a public meeting handout and exhibit boards and made these materials available on the project website ([transportation.wv.gov](http://transportation.wv.gov)) as well as the EA. The public meeting materials described the proposed project, the Preferred Alternative and its associated impacts, cost and schedule. Meeting attendees were invited to ask questions regarding the proposed project to the project team staff and provide written comments.

During the 2019 public comment period, WVDOT received 16 comments from agencies, organizations, and the public. Comments were accepted in writing at the public meeting and also via e-mail, United States mail, and through the project website until April 19, 2019.

WVDOT has addressed the comments from the 2019 public meeting in this FONSI. Appendix B contains these comments, along with individual responses from WVDOT, where appropriate. Table 4-1 lists the comments as well as the WVDOT responses.

**Table 5-1: Comments Received from the Public during the 2019 Comment Period**

Comment ID	Comment	Response
1	Please look at resurface the Shilling Bridge as you can now see the steel mesh.	Comment noted. However, reconditioning of Shilling Bridge is not part of the proposed project.
2	Please come up with some way to limit traffic (heavy trucks, busses) from using the Lumber Ave ext. Shilling Bridge as a bypass. There will be a mess at intersection Rt 40 area. Also this will make it hard to get out and in to Overbrook. Please look at the Jr Ave bridge area also to limit the use of heavy trucks, busses, as this area will be a mess at the bottom of the hill of Rt 88 to get around for people who live there. I know that you have not marked these streets as bypass, but we know that the traffic flow will increase on them by many times.	The detour route described in the EA and presented at the meeting does not use local streets; instead, it directs traffic to Interstate I-70. WVDOT will continue to analyze this during final design. WVDOT will notify residents, public transportation providers, and businesses once the detour routes are finalized. .
3	As we all know, this is an extremely important bridge from a historic standpoint, so we would expect that all possible care would be taken to preserve it and maintain its historic character.	FHWA, WVDOT, and the West Virginia State Historic Preservation Office (SHPO) have entered into a Memorandum of Agreement (MOA). The MOA outlines the complete stipulations that will need to be followed to mitigate adverse effects to the bridge to the greatest extent possible.
4	The shorter the closing of the bridge, the better.	WVDOT, in coordination with the City of Wheeling, will post notices on the Monument Place Bridge prior to and during construction to inform all users of the approximate closure period, availability of the Shilling and Junior Avenue bridges, and reasonable accommodations as developed by the contractor.



Comment ID	Comment	Response
		WVDOT will work expeditiously with the contractor to minimize the time the Monument Place Bridge is closed.
5	I run a loop (6 & 8 miles) using Rt 40, Kruger St, and the Wheeling Heritage Trail. Kayak launch location as well.	WVDOT, in coordination with the City of Wheeling, will post notices on the Monument Place Bridge prior to and during construction to inform all users of the approximate closure period and reasonable accommodations as developed by the contractor. WVDOT will work expeditiously with the contractor to minimize the time the Monument Place Bridge is closed.

A community survey regarding pedestrian access during construction was made available at the public meeting. WVDOT wanted to obtain input on pedestrian use of the existing Monument Place Bridge to better assess potential impacts to existing users during closure of the bridge. Four attendees responded to this survey (Appendix B). The survey asked questions regarding frequency of bridge use, start and end points of the walking trip, and alternate routes users would consider during construction activities. Respondents stated they use the bridge between 2 and over 10 times per week for leisure, fitness, and access to businesses in Elm Grove’s commercial core. Users access the Monument Place Bridge from the areas north, west, and east of the bridge. During closure of the Monument Place Bridge, respondents stated they would use the Wheeling Heritage Trail, Lumber Avenue, Junior Avenue, and the Shilling and Junior Avenue Bridges. The main concerns respondents had related to pedestrian access during construction were safety; impeded access to the area of the bridge, businesses, and to the Wheeling Heritage Trail; additional automobile traffic on Coal Avenue at certain times; and surface condition of Coal Avenue, Hendricks Avenue, Lumber Avenue, and the Shilling Bridge. All four responses are included in Appendix B.

## 6 PROJECT REFINEMENTS SINCE ISSUANCE OF THE ENVIRONMENTAL ASSESSMENT

WVDOT has refined the proposed project in response to comments received during the EA public comment period. Comments received from the U.S. Environmental Protection Agency (USEPA) indicated clarification was necessary in some portions of the EA. Appendix B includes the letter from USEPA. As a result of these comments, WVDOT prepared an erratum to the EA as follows:

1. Page 3-10 of the EA states that “The channel morphology displays low sinuosity and appears relatively stable because of development and impacts to the stream.” The EA

has been modified to read “The channel morphology displays low sinuosity. In addition, the section of the stream in the study area is located in a developed area, which forces Wheeling Creek to stay in its current channel.”

2. Page 3-31 of the EA lists some Best Management Practices (BMPs) to minimize impacts to streams. The EA has been modified as follows: “Construction equipment storage and refueling will not be conducted in the floodplain.”
3. The EA has been modified as follows: “WVDOT will conduct a mussel survey during the 2019 season.”
4. The following sentence has been added to Section 3.4 – Temporary Construction Impacts of the EA: “WVDOT will continue to work with the City of Wheeling during design and construction of the Monument Place Bridge. The City will inform the public of upcoming bridge closures associated with the project, along with automobiles and pedestrians. Media notices will be provided related to construction activities.”
5. The language describing Little Wheeling Creek in Section 3.3.4 is unclear. The EA has been modified to read: “The 2014 West Virginia Integrated Water Quality Monitoring and Assessment Report lists Wheeling Creek and Little Wheeling Creek as impaired for one or more uses and has a Total Maximum Daily Load (TMDL) (West Virginia Department of Environmental Protection [WVDEP] 2014a). Wheeling Creek is not supporting of public water supply or water contact recreation, but is fully supporting of agriculture and wildlife and water supply for industrial purposes. WVDEP does not have sufficient data to determine whether Wheeling Creek is supporting of warm water fishery (WVDEP 2014b). Wheeling Creek is listed with a developed TMDL for fecal coliform in 2009. On the other hand, Little Wheeling Creek is not supporting of warm water fishery, public water supply, or water contact recreation, but is fully supporting of agriculture and wildlife and water supply for industrial purposes (WVDEP 2014b). Little Wheeling Creek is listed with a developed 2009 TMDL for iron and a 2010 TMDL for fecal coliform.”

## 7 MITIGATION MEASURES TO MINIMIZE HARM

The EA describes the proposed project, its likely effects, and potential mitigation measures to avoid or minimize those effects. FHWA requires these mitigation commitments (Table 6-1) as a condition of FHWA’s finding that the proposed project will have no significant impact. These mitigation commitments are based on the mitigation measures identified in the published EA and described in the Section 106 MOA and Programmatic Section 4(f) Evaluation (Attachment



E). Satisfaction of the mitigation commitments will be a condition of any future FHWA funding for the proposed project.

**Table 7-1: Environmental Commitments**

Environmental Resource Impact	Environmental Commitment ID	Environmental Mitigation and Commitment
<b>Environmental Justice</b>	1	Representatives of WVDOT will work with the City of Wheeling to post notices on Monument Place Bridge prior to and during construction to inform all users of the temporary closure during the construction phase. This notice will inform the public of the approximate closure period and the availability of the Shilling and Junior Avenue bridges, as well as other reasonable accommodation as developed by the contractor. WVDOT also posted a notice on the bridge to inform users of the public meeting and the opportunity to comment on the proposed project. Following the City of Wheeling’s normal process to notify the public, the bridge closure will also be published in local newspapers at least 7 days in advance of the closure.
<b>Right-of-Way Acquisition</b>	2	All right-of-way acquisitions will follow the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, WVDOT policies, and West Virginia laws.
<b>Community Facilities and Services</b>	3	Representatives of WVDOT will meet with the Ohio Valley Regional Transportation Authority and Eastern Ohio Regional Transit Authority to coordinate temporary and/or permanent re-routes of local bus traffic.
<b>Changes in Travel Patterns</b>	4	Under the proposed project, temporary detours will be established for automobiles and buses. WVDOT will include a requirement in the contract plans and specifications that the contractor must provide reasonable accommodation for pedestrians during construction. WVDOT will provide notification to residents, public transportation providers, and businesses once detour routes are determined.
<b>Historic Resources</b>	5	The proposed project will result in an adverse effect to the historic Monument Place Bridge. The Section 106 MOA lists the mitigation measures to minimize harm to the bridge.
<b>Publicly Owned Land/ Section 4(f) Properties</b>	6	Under the proposed project, the historic Monument Place Bridge will be affected. An FHWA Programmatic Section 4(f) Evaluation was prepared for these impacts. Measures to minimize harm to the bridge are described in the Section 106 MOA.
<b>Floodplain Encroachment</b>	7	An Erosion and Sedimentation Control Plan and detailed hydraulic analysis will be prepared during the design phase. Roadway embankments and any disturbed areas within the floodplains will be seeded with native seed mixtures to protect the floodplains from erosion and to enhance the natural and beneficial floodplain values. Construction equipment storage and refueling will not be conducted in the floodplain. Construction within the floodplains will be coordinated with the United States Army Corps of Engineers (USACE), local Floodplain Managers, and state resource agencies, as required. All necessary permits will be obtained.



Environmental Resource Impact	Environmental Commitment ID	Environmental Mitigation and Commitment
Streams and Water Quality	8	<p>A Section 404 permit will be obtained from USACE prior to construction. USACE will determine the required mitigation, if any, for the temporary stream impacts. All permit conditions will be followed.</p> <p>A Section 401 water quality certification from WVDEP will be obtained. Best Management Practices to minimize impacts to water quality will be included in contract documents. An Erosion and Sedimentation Control Plan and Stormwater Pollution Prevention Plan will be developed and followed.</p>
Wetlands	9	<p>WVDOT visited the study area on numerous occasions. With the exception of Little Wheeling Creek (identified as a riverine wetland in the National Wetland Inventory [NWI]), no other wetlands were identified within the study area. Permanent wetland impacts, if any, will be mitigated prior to completion of construction in accordance with USACE Section 404 permit conditions. Wetlands that will be temporarily affected will be restored to their prior condition and seeded or planted with native wetland species to replicate or enhance the original vegetated community.</p>
Vegetation	10	<p>Any disturbed areas will be re-vegetated using a native seed mixture during construction.</p>
Migratory Birds, Terrestrial Wildlife, Aquatic Species	11	<p>Construction noise could temporarily affect any migratory birds, terrestrial wildlife, or aquatic species. WVDOT will work with its contractors to minimize, to the extent reasonably practicable, construction-related noise disturbances. According to the WVDOT <i>2002 Construction Manual</i>, during pre-construction, the Engineering Division will:</p> <ul style="list-style-type: none"> <li>• Identify land uses or activities that may be affected by noise from construction.</li> <li>• Determine appropriate noise criteria limits for the identified receptors.</li> <li>• Document any measures required during construction to minimize or eliminate adverse construction noise impacts to the surrounding area.</li> </ul> <p>In addition, the project special provisions will document any restrictions or noise abatement measures required of the contractor. These could include shields or physical barriers, or limiting work hours, among others.</p>
Rare, Threatened, and Endangered Species	12	<p>To mitigate for possible impacts to mussels, WVDOT will conduct a mussel survey prior to construction and will continue to consult with the United States Fish and Wildlife Service and the West Virginia Division of Natural Resources. Mitigation measures specified by these agencies, if any, will be followed.</p>
Aesthetics and Visual Resources	13	<p>The stipulations in the Section 106 MOA will be followed.</p>
Energy	14	<p>Energy impacts cannot be directly mitigated; however, the following measures will be considered during construction to minimize potential impacts:</p> <ul style="list-style-type: none"> <li>• Delays along adjacent roadways resulting from construction/rehabilitation will be minimized by construction phasing.</li> <li>• Efforts will be made to use efficient construction/rehabilitation methods and equipment to minimize construction energy consumption.</li> <li>• Energy expenditure for construction/rehabilitation will be recovered as the new improvements result in overall energy maintenance.</li> </ul>



Environmental Resource Impact	Environmental Commitment ID	Environmental Mitigation and Commitment
Groundwater	15	In order to minimize potential impacts to groundwater resources, an approved Erosion and Sedimentation Control Plan will be implemented. In addition, the following BMPs and recommendations will be considered during final design and construction: <ul style="list-style-type: none"> <li>• Promptly re-vegetate all disturbed areas to prevent accelerated runoff to surface waters.</li> <li>• Designate and construct all stormwater management facilities to prevent or minimize runoff.</li> <li>• Minimize the amount of vegetative clearing and impervious surface within the right-of-way to reduce runoff.</li> <li>• Consider the use of vegetated stormwater management basins to assist in the infiltration by soils of highway runoff.</li> <li>• Coordinate mitigation activities with natural resource agencies.</li> </ul>
Waste Sites	16	In the event of a spill or a release of petroleum products, the area will be cleaned up in accordance with state and local regulations.
Air Quality	17	With the application of appropriate BMPs to limit dust emissions during rehabilitation, the proposed project will not cause any significant, short-term particulate matter air quality impacts. Adherence to dust control measures in the WVDOT Standard Specifications Roads and Bridges will help minimize the effects of construction on air quality.
Noise	18	Contract documents will specify noise limits for construction equipment. According to the WVDOT <i>2002 Construction Manual</i> , during pre-construction, the Engineering Division will: <ul style="list-style-type: none"> <li>• Identify land uses or activities that may be affected by noise from construction.</li> <li>• Determine appropriate noise criteria limits for the identified receptors.</li> <li>• Document any measures required during construction to minimize or eliminate adverse construction noise impacts to the surrounding area.</li> </ul> <p>In addition, the project special provisions will document any restrictions or noise abatement measures required of the contractor. These could include shields or physical barriers, or limiting work hours, among others.</p>
Traffic	19	WVDOT will continue to evaluate existing and proposed intersections further during final design. The intersections will be designed in accordance with the appropriate Design Directives in West Virginia, including the design of lane configurations, taper rates, and storage lengths.

## 8 ENVIRONMENTAL DETERMINATIONS AND FINDINGS

### 8.1 NEPA Finding

FHWA served as the lead federal agency under NEPA for the proposed project. WVDOT will construct the proposed project in accordance with the design features and mitigation measures presented in the EA, Section 4(f) Evaluation, and Section 106 Evaluation. The EA for this

project complies with NEPA, 42 USC § 4331, et. seq., and 23 CFR § 771.121. FHWA has made an independent evaluation of the EA and Section 4(f) Evaluation.

After reviewing the EA and supporting documents, including public comments and responses, FHWA finds that the proposed project will result in temporary and permanent effects on some resources as identified in Table 7-1. Mitigation measures that WVDOT will implement to avoid or minimize effects on these resources were described previously in Table 6-1.

**Table 8-1: Permanent and Temporary Effects of the Proposed Project**

Environmental Resource Category	Mitigation Commitment ID (Table 6-1)	Temporary Effects During Construction? (Yes/No)	Permanent Effects? (Yes/No)
Environmental Justice	1	No	No
Right-of-way Acquisition	2	Yes	No
Residential Displacements	N/A	No	No
Business Displacements	N/A	No	No
Community Facilities/Services	3	Yes	No
Bicycle/Pedestrian Facilities	4	Yes	No
Community Cohesion	N/A	No	No
Change in Travel Patterns	4	Yes	No
Land Use	N/A	No	No
Archaeological Resources	N/A	No	No
Historic Resources	5	Yes	Yes
Section 4(f) Properties	6	Yes	Yes
100- and 500-year Floodplain	7	Yes	Yes
Streams	8	Yes	Yes
Water Quality	8	Yes	No
Wetlands	9	Yes	Yes
Wild and Scenic Rivers	N/A	No	No
Natural and Wild Areas	N/A	No	No



Environmental Resource Category	Mitigation Commitment ID (Table 6-1)	Temporary Effects During Construction? (Yes/No)	Permanent Effects? (Yes/No)
Vegetation	10	Yes	Yes
Wildlife (migratory birds, terrestrial wildlife, and aquatic wildlife)	11	Yes	Yes
Rare, Threatened, and Endangered Species	12	Maybe	Maybe
Prime and Unique Farmland	N/A	No	No
Geologic Resources	N/A	No	No
Aesthetics and Visual Resources	13	Yes	Yes
Energy	14	Yes	No
Groundwater	15	No	No
Waste Sites	16	No	No
Air Quality	17	Yes	No
Noise	18	Yes	No
Traffic Capacity	19	Yes.	No
Cumulative Impacts	N/A	Yes	Yes
Secondary Impacts	N/A	Yes	Yes

**Pursuant to 23 CFR § 771.121, FHWA finds that the proposed project with mitigation to which WVDOT has committed will have no significant impact on the environment.** The record provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required.

## 8.2 Federal Uniform Relocation Act Compliance

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 61) and its implementing regulations, 49 CFR § 24, ensure the fair and equitable treatment of persons whose real property is acquired or who are displaced as a result of a federal or federally assisted project.

It is anticipated that the proposed project will require six temporary construction easements. Acquisition of the temporary easement will be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

### **8.3 Section 106 Finding**

In compliance with Section 106 of the National Historic Preservation Act of 1966 and in accordance with the Criteria of Adverse Effect described in 36 CFR § 800.5, FHWA determined that the proposed project will have an Adverse Effect on the historic Monument Place Bridge that is listed in the NRHP and the sidewalk, balustrade, and brackets. These three key elements have acquired historic significance.

The West Virginia Division of Culture and History (WVDCH), which serves as the WVSHPO, concurred with these determinations on April 10, 2018. FHWA, WVDOT, and SHPO entered into an MOA, which includes the stipulations that will need to be followed to mitigate adverse effects to the bridge to the greatest extent possible. The MOA is included in Appendix C.

FHWA also found that the proposed project will also have temporary visual and audible effects on 17 historic resources in the Area of Potential Effects (APE). The effects will not result in alterations or other permanent impacts to the character or integrity of these historic buildings.

Based on the historic resources analysis included in the EA as well as the consultation with WVSHPO, **FHWA finds, in accordance with 36 CFR § 800, that the Section 106 coordination and consultation requirements for the proposed project have been fulfilled.**

### **8.4 Endangered Species Act of 1973 (ESA) Findings**

The ESA intends to protect threatened and endangered species and the ecosystems on which they depend (16 USC §§ 1531-1544). The ESA requires a federal agency to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the continued existence of any listed species or result in direct mortality or destruction or adverse modification of critical habitat of listed species (50 CFR § 402). This requirement is fulfilled under Section 7 of the ESA by review of the proposed actions and consultation with the appropriate agency responsible for the conservation of the affected species (16 USC § 1536 *et seq.*). If necessary, mitigation is required to avoid jeopardizing listed species or their habitat.

Section 7 of the ESA requires all federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) for freshwater species and inland flora and fauna (50 CFR § 402). The proposed project is not anticipated to affect bald eagles.

USFWS-West Virginia determined that the proposed project is not anticipated to affect the Indiana bat. USFWS also determined that the northern long-eared bat may occur within the range of the project and be affected by construction and operation of the project. However, the study area is outside of the designated hibernacula distance, and there are no known occupied maternity roost trees. Therefore, any incidental take of this species associated with the project is “not prohibited” and a site-specific incidental take authorization will not be necessary.

WVDNR determined that there are no known occurrences of rare, threatened, or endangered species or natural trout streams within the study area. However, WVDNR stated that a mussel survey will be required. The mussel survey will be conducted in 2019.

## **8.5 Wetlands Finding**

USDOT seeks to assure the protection, preservation, and enhancement of the nation’s wetlands to the fullest extent practicable during the planning, construction, and operation of transportation facilities and projects (DOT Order 5660.1A). Executive Order 11990 requires that new construction located in wetlands be avoided unless there is no practicable alternative to the construction. It also requires that the proposed project include all practicable measures to minimize harm to wetlands that may result from construction.

Under Section 404 of the Clean Water Act (CWA)(33 U.S.C. 1251 et seq), USACE regulates discharges of dredged or fill materials into waters of the United States, including wetlands (33 CFR § 323). USACE requires that adverse effects on wetlands be avoided or minimized to the extent practicable (40 CFR § 230).

WVDOT visited the study area on several occasions. With the exception of Little Wheeling Creek (identified as a riverine wetland in the NWI), no other wetlands were identified within the study area. Since there will be in-stream work, a Section 404 permit will be required. WVDOT will submit the application, as well as an application for Section 401 Water Quality Certification. The permit will specify the mitigation requirements. WVDOT will abide by the conditions stipulated in the USACE Section 404 permit.

The Section 401 Water Quality Certification required for the proposed project will incorporate BMPs to reduce the potential for surface water impacts during construction. These BMPs may include erosion control and temporary seeding of all exposed soils, segregation and protection of fuel supplies and other hazardous materials, containment of re-suspended sediment via silt curtains, and other applicable measures for the protection of surface waters. These requirements, along with the development of an Erosion and Sedimentation Control Plan, will be

incorporated into the project construction specifications and will be coordinated with the appropriate federal and state agencies.

WVDOT visited the study area on several occasions. With the exception of Little Wheeling Creek (identified as a riverine wetland in the NWI), no other wetlands were identified within the study area. Any potential wetland impacts will be determined during the permitting phase.

With the mitigation commitments in Table 6-1, including a commitment to comply with permit conditions to be determined in consultation with USACE, **FHWA finds that the proposed Project satisfies the requirements of Executive Order 11990 and Section 404 of the CWA.**

## 8.6 Floodplains Finding

The protection of floodplains and floodways is required by Executive Order 11988; USDOT Order 5640.2, Floodplain Management and Protection; Federal-Aid Highway Program Manual 6-7-3-2, Location and Hydraulic Design of Encroachments on Floodplains; and 23 CFR § 650. The intent of these regulations is to avoid or minimize highway encroachments within the 100-year floodplains, where practicable, and to avoid land use development that is incompatible with floodplain values. Where encroachments are unavoidable, the regulations require taking appropriate measures to minimize impacts.

The proposed project will affect approximately 18,731 square feet of 100-year floodplain and 17,860 square feet of 500-year floodplain. WVDOT will minimize encroachments on the 100-year floodplains to the extent possible during design. WVDOT will submit a floodplain permit application to the Wheeling Floodplain Manager and the West Virginia Division of Homeland Security and Emergency Management and will follow conditions specified in such permits.

Preliminary analyses of the Build Alternatives determined there are no practical alternatives that will not cause any adverse effects on floodplains.

With the mitigation commitments described above and compliance with local and state permit requirements, **FHWA finds that the proposed project will have no significant impacts on 100-year floodplains or floodways.**

## 8.7 Environmental Justice Finding

Executive Order 12898 provides that “each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and/or low-income populations.” A disproportionately high and adverse

effect on minority or low-income populations is defined as an adverse effect that: (a) is predominantly borne by a minority population and/or a low-income population; or (b) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population (USDOT Order 5610.2(a)).

Based on the analysis contained in the EA and the mitigation commitments made by FHWA, the proposed project will not result in adverse effects on environmental justice populations. As a result, **FHWA finds that the proposed project will not result in disproportionately high and adverse effects on Environmental Justice populations.**

## **8.8 Air Quality Conformity Finding**

The Clean Air Act (CAA) (42 U.S.C. §7401 et seq.) and its associated regulations (40 CFR § 50) are the basic federal statutes and regulations governing air pollution. The Transportation Conformity Rule (40 CFR § 93, Subpart A) requires that projects that are developed, funded, or approved by USDOT and by metropolitan planning organizations or other recipients of federal funds demonstrate conformity with the State Implementation Plan (SIP) developed pursuant to the CAA. A determination of conformity is made by the metropolitan planning organization and USDOT.

The proposed project is identified in the Fiscal Year 2018–2021 Belmont-Ohio-Marshall (Bel-O-Mar) Regional Council’s Transportation Improvement Program (TIP) as Project ID O-3. The proposed project is within the fiscally constrained 2040 Long Range Transportation Plan (LRTP). Even though Bel-O-Mar has determined that both the LRTP and the TIP satisfy air quality conformity requirements, the proposed project is considered “exempt” from air quality conformity analysis.

## **8.9 Section 4(f) Finding**

Section 4(f) of the USDOT Act of 1966 (49 USC § 303) is a national policy that states that the Secretary of Transportation may not approve transportation projects that use publicly owned parks, recreation areas, wildlife and waterfowl refuges, or any significant historic site unless a determination is made that there is no prudent or feasible alternative to using that land, and that all possible planning has been done to minimize harm.

The proposed project will result in a Section 4(f) use of the Monument Place Bridge and sidewalk overhang as a result of (1) replacing the existing balustrade with a closed-window,



taller balustrade on the outside edge of each sidewalk barrier and (2) using concrete scour protection for the piers and buttresses.

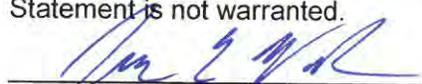
FHWA determined that the project meets all of the applicability criteria set forth in the *Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges*, which was issued on July 5, 1983.

There are no feasible or prudent alternatives to avoid the use of the historic bridge or sidewalk overhang. The executed MOA between FHWA, WVDOT, and WVSHPO, along with the Programmatic Section 4(f) Evaluation, documents that all possible planning to minimize harm to the Monument Place Bridge has been taken. The Programmatic Section 4(f) Evaluation is included in Appendix D.

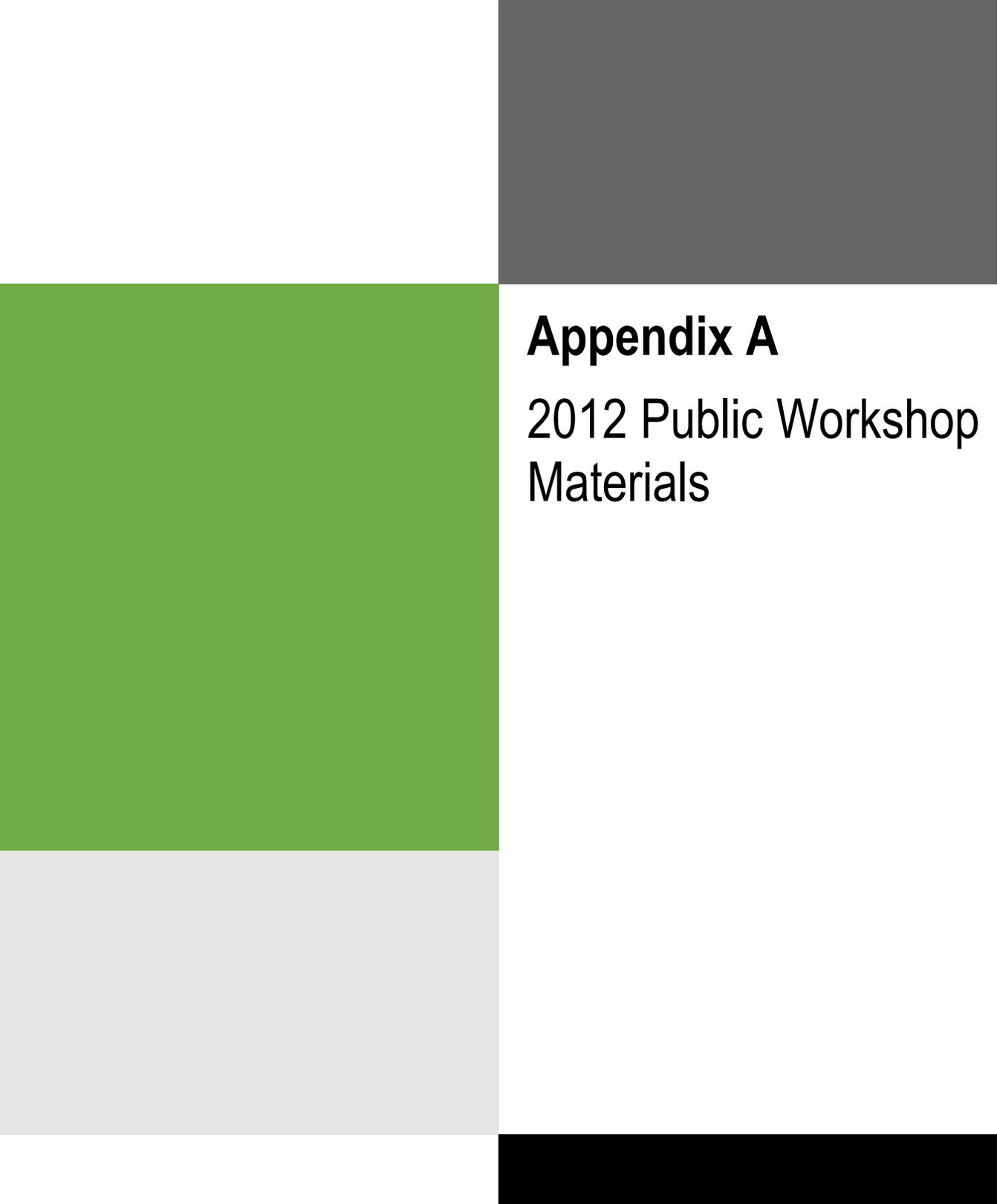
Taking into account the mitigation commitments made by WVDOT, **FHWA finds that the proposed project is in compliance with the Section 4(f) statute 49 USC § 303 and 23 USC § 138 and the implementing regulations under 23 CFR § 774.**

## 9 CONCLUSION

Based on the EA and its associated supporting documents, FHWA finds that, pursuant to 23 CFR § 771.121, there are no significant impacts on the environment associated with the development and operation of the proposed project. Preparation of an Environmental Impact Statement is not warranted.

  
\_\_\_\_\_  
Mr. Jason Workman  
Director, Program Development  
Federal Highway Administration

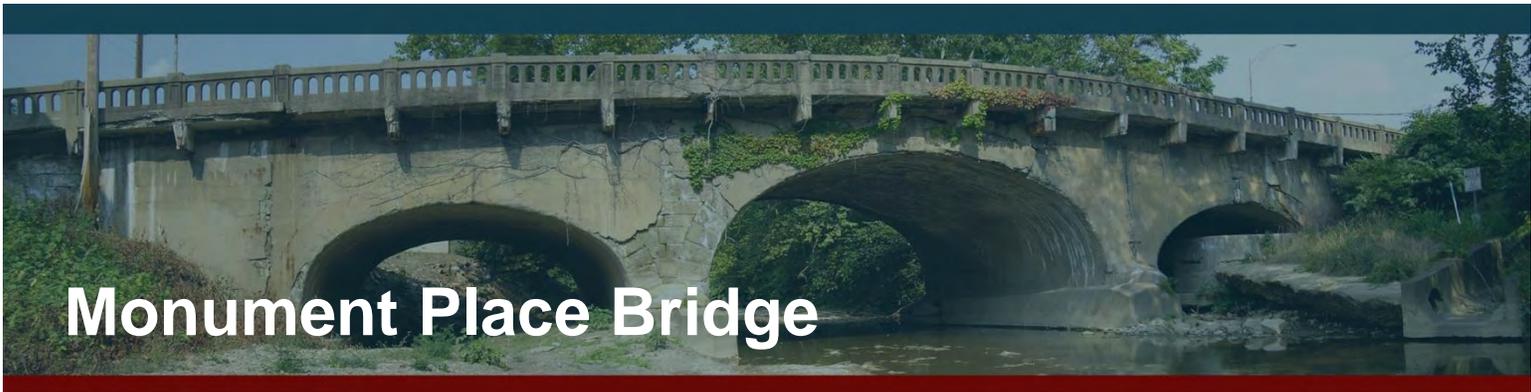
6-14-19  
\_\_\_\_\_  
Date



## **Appendix A**

### 2012 Public Workshop Materials

Flyer



# Monument Place Bridge

## INFORMATIONAL WORKSHOP PUBLIC MEETING

### MONUMENT PLACE BRIDGE Rehabilitation/Replacement Project

**Date:** Thursday, May 31, 2012

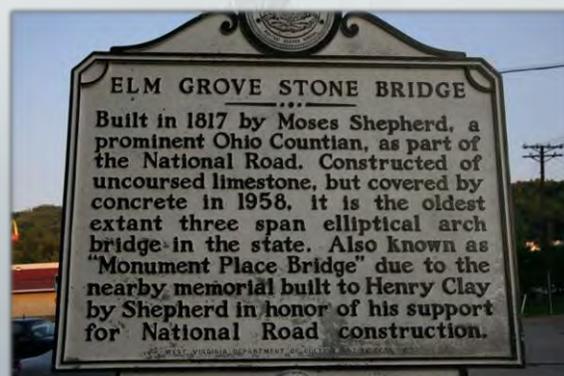
**Time:** 4:00-7:00pm (no formal presentation)

**Where:** Bridge Street Middle School,  
19 Junior Ave., Wheeling, West Virginia  
(in the cafeteria)

#### Project Background

The Monument Place Bridge is located on US 40 and carries traffic over Little Wheeling Creek. Constructed in 1817 by Moses Shepherd, this structure is the oldest bridge in West Virginia, and is among the oldest bridges in the country. It was inducted into the National Register of Historical Places in 1981. The three span structure was updated in 1931 when concrete sidewalks were added. In 1958, a concrete veneer was applied over the stone, giving it the appearance of a concrete arch bridge. Over time, a significant portion of the concrete veneer has become delaminated from the original stones, portions have become dislodged, and additional deterioration is evident. The purpose of this project is to evaluate the most economical and feasible rehabilitation or replacement options for the stone arch structure.

Those wishing to file written comments may send them to Gregory Bailey, P.E., Director Engineering Division, West Virginia Division of Highways, Capitol Complex Building 5, 1900 Kanawha Boulevard East, Charleston, West Virginia 25305-0430 on or before Monday, July 2, 2012. Visit the WVDOH Website at [www.transportation.wv.gov](http://www.transportation.wv.gov) for project information and the opportunity to comment electronically.



# Attendance Sheets

WEST VIRGINIA DEPARTMENT OF TRANSPORTATION  
DIVISION OF HIGHWAYS

INFORMATIONAL WORKSHOP PUBLIC MEETING  
ATTENDANCE SHEET

PROJECT: Monument Place Bridge Rehabilitation/Replacement DATE: May 31, 2012

State Project: S335-40-6.65

LOCATION:

Federal Project: BR-0040(049)E

Bridge Street Middle School

Ohio County, West Virginia

19 Junior Avenue

Wheeling, WV

PLEASE PRINT

	<u>NAME</u>	<u>ORGANIZATION or EMAIL /ADDRESS</u>
1.	Harold Vitalie	self
2.	Emma Lou Coile	self
3.	SHARON + BILL O'LEARY	SELF
4.	RAY MILLER	SELF
5.	RITA HENTHORNE	SELF
6.	Carl & Clea Shaffer	"
7.	GREGORY SMITH	Whg. HLC
8.	ORPHY KLEMPA	STATE SENATE
9.	Mark Lally	WesBanco Bank
10.	ED PHILLIPS	
11.	Pete Vochum	810 -Tow cleaners
12.	Gene Foley	City of Wheeling
13.	Beeth Strawn	Main Street
14.	CONRAD SLAWINA	CITY OF WHG

<u>NAME</u>	<u>ORGANIZATION or EMAIL/ADDRESS</u>
15. Sean Duffy	Ohio County Highways [REDACTED]
16. Ian Hicks	The Intelligencer [REDACTED]
17. BILL PHIPPS	BEL-O-MAR [REDACTED]
18. Bernie Dolan	Ohio County Schools
19. Bob Muransey	BEL-O-MAR
20. Tom Miller	Westbank Park
21. DELEGATE Mike Ferns	WV House of Delegates
22. Tim Birch	City of Wheeling
23. Terry Sterling	Chamber of Commerce
24. Fred Dugan	Westbank
25. Philip Stahl	WTVN-TV9
26. Fred Hunter	DEB'S GROVE BEAUTY SALON
27. Kate Quinn	Inds of Wky
28. HENRY CASTILLOW SR	Elm Grove Eagles
29. MADGE CASTILLOW	" " "
30. Ryan Ferns	WV House of Delegates
31. C.J. Kaiser	WHEELING Historic Landmarks Comm.
32. Bekah Karchis	WNHAC
33. Jeremy Morris	Wheeling National Heritage Area
34. Dawid Sitor	WADOT Dist-56
35. Tom Connelly	City of Wheeling
36. Robert Herron	City of Wheeling

NAME

ORGANIZATION or EMAIL/ADDRESS

37. Doug Clatterbuck

38. DAVE SADIA

39. HARRY CHOFF

40. John + Donna Clark

41. Jeanne Finstein

42. Janice Ross

43. Joe Moskitis

44. Erika Storch

45. Sheryl Galt

46. Yvonne Elliott

47. Paula Weese

48. STEVE JOHNSON

49.

50.

51.

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53.

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58.



Handout



## Alternatives Comparison

The proposed alternatives are summarized and compared in the table below.

	Sidewalks	Three 12' Lanes	Two 12' Lanes	Detour	Construction Cost Estimate
No Build (existing bridge)	YES	X	-	-	*
Alternative 1A	YES	X	-	YES	\$4,278,000
Alternative 1B	YES	X	-	YES	\$3,024,000
Alternative 2	YES	X	-	YES	\$3,762,000
Alternative 3	YES	X	-	YES	\$4,837,000
Alternative 4	NO	-	X	No	\$3,146,000
Alternative 5	Eliminated from further consideration				

\*The maintenance costs over time will significantly increase as the structure continues to deteriorate.

## Next Steps...

### July 2, 2012

All public comments due to WVDOH

### Summer 2012

Begin environmental studies

### Fall 2012

Additional Public Meetings for Environmental Document

### 2013 and Beyond...

Final Design of Preferred Alternative and Construction

## Why should you be involved in the project?

Comments on this project and its potential impacts are requested from the public to assist in the study and development of the recommendations. The comments and suggestions you provide are important so the agencies involved can hear the concerns of the people who live and work in the area. Your input will be used to guide the study team as the project moves forward.

Comments are due July 2, 2012 and should be sent to the following:

Mr. Gregory Bailey, P.E., Director  
 Engineering Division  
 West Virginia Division of Highways  
 State Capitol Complex, Building 5  
 1900 Kanawha Boulevard East  
 Charleston, West Virginia 25305-0430

Visit the WVDOH Website at [www.transportation.wv.gov](http://www.transportation.wv.gov) for project information and the opportunity to comment electronically.



# Monument Place Bridge

## Informational Workshop Public Meeting

### Welcome

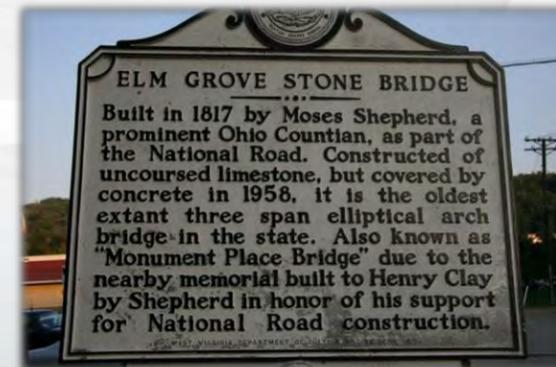
Thank you for participating in the informational workshop public meeting for the Monument Place Bridge in Wheeling, WV. This meeting is being presented by the West Virginia Division of Highways to inform the public of the project and to collect public opinion and comment.

This workshop is from 4:00 pm to 7:00 pm on Thursday, May 31<sup>st</sup>, 2012 in the cafeteria of the Bridge Street Middle School in Wheeling, WV. There will be no formal presentation. The workshop is intended to be informal to maximize the interaction between the citizens and project team. We invite you to browse the displays and encourage discussions with the project team. A comment sheet is included in this package and additional sheets are available at the information desk. Comments can also be submitted online at [www.transportation.wv.gov](http://www.transportation.wv.gov).

## Project Background and Description

### Background

The Monument Place Bridge is located on US 40 and carries traffic over Little Wheeling Creek. It was part of the original US 40/National Road and is one of only two (along with the Wheeling Suspension Bridge) existing bridges in West Virginia from that historic facility. Constructed in 1817 by Moses Shepherd, this structure is the oldest bridge in West Virginia, and is among the oldest bridges in the country. Also known as the Shepherd Bridge and Elm Grove Stone Arch Bridge, it was inducted into the National Register of Historic Places in 1981. The bridge is a unique and rare example of a stone arch that features the elliptical style of arch geometry. The three span structure was updated in 1931 when the concrete sidewalks were added. In 1958, a concrete veneer was applied over the stone, giving it the appearance of a concrete arch bridge.



### Project Purpose

Over time, a significant portion of the concrete veneer has become delaminated from the original stones, portions have become dislodged, and additional deterioration is evident. The original stone is visible in numerous places on the structure. The sidewalk and railing also show deterioration. The structure is currently posted for weight limit restrictions of 16 tons for single unit trucks and 32 tons for tractor trailers.

The purpose of this project is to evaluate the most economical and feasible rehabilitation or replacement options for the stone arch structure. Six (6) alternatives were developed and compared from a design and cost perspective. The existing historic bridge will remain regardless of the option selected.





## The Alternatives

### No-Build Alternative

The No-Build Alternative considers taking no rehabilitation or replacement action and continuing to maintain the structure as is. The WVDOH will continue to provide routine maintenance on the structure as currently is done today.

### Alternatives 1A, 1B, 2 and 3

Alternatives 1A, 1B, 2 and 3 propose various forms of rehabilitating the existing structure. Alternative 1 has been developed as two options: 1A and 1B. Alternative 1A involves the rehabilitation of the existing bridge, which includes removal of all existing concrete, existing deck, sidewalks and the arch. Then, a significant number of stones will be removed and reset before rehabilitating existing piers and abutments. New sidewalks and asphalt roadway will also be constructed. Alternative 1B (less extensive) is similar to 1A without the need for removal and resetting (or replacement) of a significant number of stones. Instead of dismantling the stone masonry, the structure will be cleaned and repointed in place. Isolated damaged stones will be replaced where necessary and feasible.

Alternative 2 involves a hybrid rehabilitation of the existing bridge. It includes a significant portion of the work required for Alternative 1B plus the construction of a completely new load-carrying system that will prevent overloading of the original arch.

Alternative 3 is a rehabilitation option using one of a several modern, commercially available systems. Systems considered involve installing steel rods into the arch for support, drilling reinforcing bars into and along the arch or applying fiber reinforced wraps along the bridge to strengthen the arch. These options vary in difficulty to construct and some could be visually obtrusive.

For Alternatives 1A, 1B, 2 and 3, a temporary detour using existing routes is proposed to maintain traffic while the existing structure is closed. Additional information on the proposed detour routes is found on the next page. The bridge will have three 12' lanes with 5' sidewalks on each side of the bridge.

### Alternative 4

This alternative proposes the replacement of the bridge on a new alignment approximately 833 ft upstream of the existing structure between the dual structures carrying I-70 over US 40 and Little Wheeling Creek. This alternative also includes relocating US 40 along existing city streets, Lumber Avenue and Coal Avenue. This will require upgrading local streets to meet design criteria of an urban arterial facility.

The proposed structure will not have the same overall width of the existing Monument Place Bridge due to the constraints of the existing piers of I-70. The proposed structure will consist of two 12' lanes with 4' shoulders and no sidewalks.

Traffic will be maintained on the existing bridge while the new structure is being constructed.

### Alternative 5

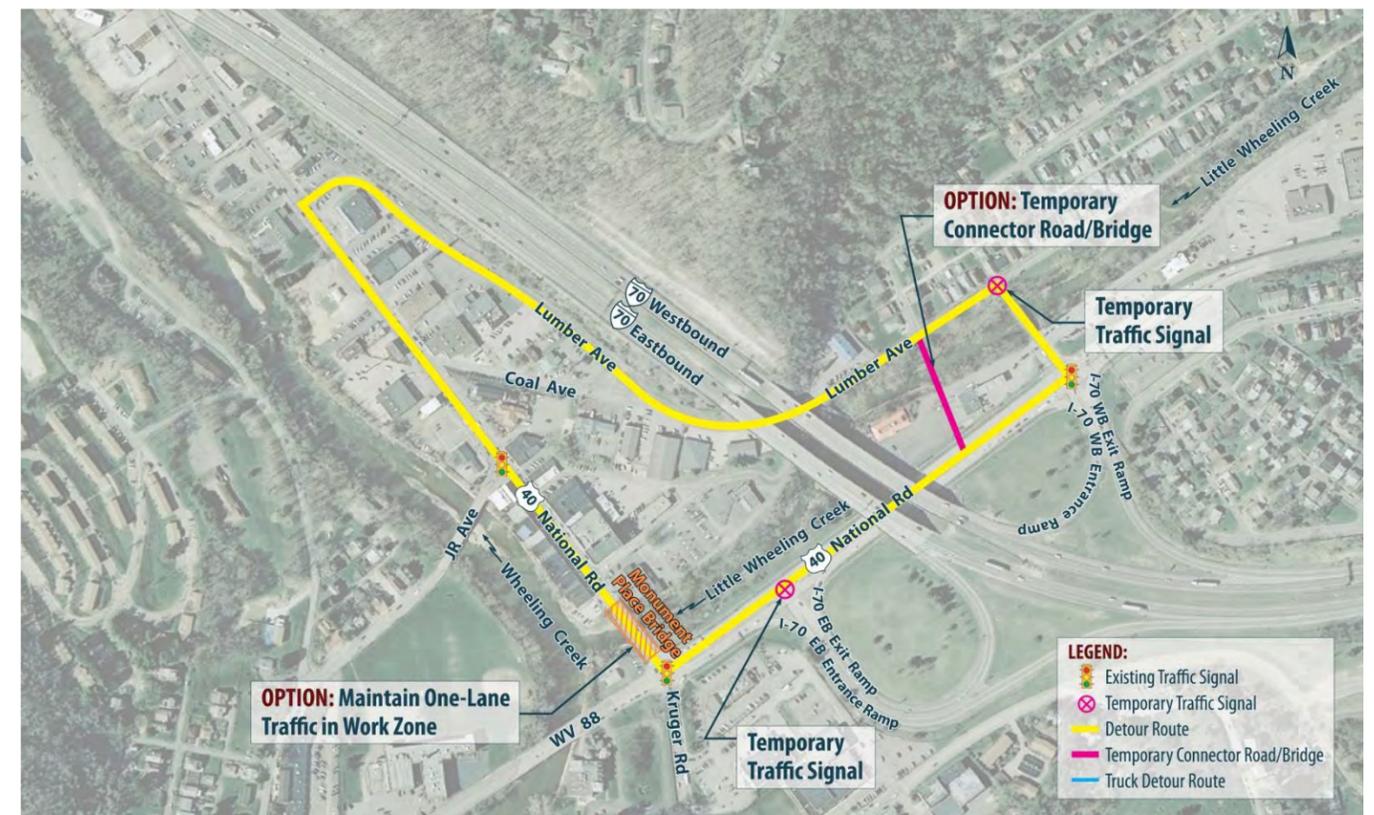
Alternative 5 provides for a new structure downstream of the existing structure. Based on the significant right-of-way, hydraulic, and traffic impacts created by this alternative, it has been determined that this option is not a viable solution and has been eliminated from further consideration.

## Construction Detour

### Local Traffic

A detour, using the existing street system, is proposed to maintain traffic throughout the construction of Alternatives 1A, 1B, 2 or 3. The detour, as shown below, utilizes Lumber Avenue and the existing Unnamed Road to bypass Monument Place Bridge. There is an option to construct a temporary connector road/bridge to eliminate traffic on existing unnamed road, but this option increases the cost of construction significantly and provides minimal improvements to traffic conditions. There is also an option to maintain one lane of traffic on the existing Monument Place Bridge throughout construction, but this could increase the construction duration considerably.

### Local Traffic Detour Options

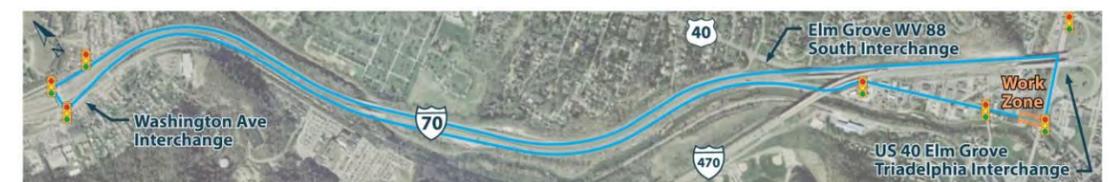


### Truck Traffic

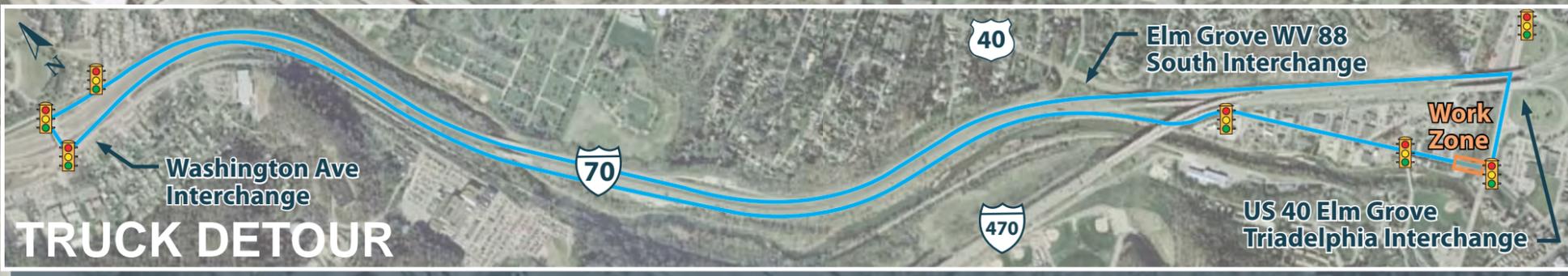
\* For Alternatives 1A, 1B, 2 and 3

The proposed local traffic detour will not be able to accommodate large trucks. Therefore, truck traffic will be detoured to the Washington Avenue interchange, approximately 2 miles west of the project site and the WV 88 South/Elm Grove Interchange. This truck detour is depicted in the figure below.

### Truck Detour



# Boards



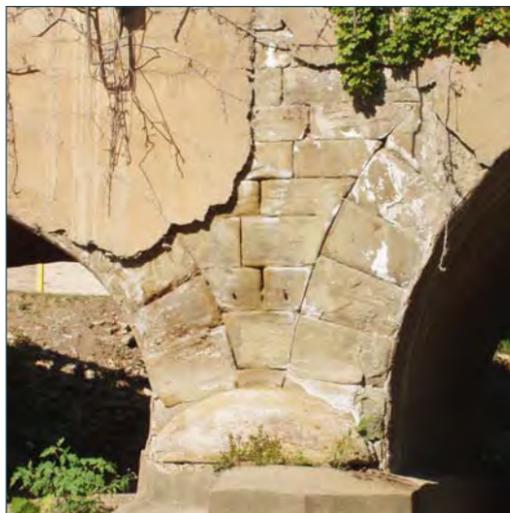
**LEGEND:**

- Existing Traffic Signal
- Temporary Traffic Signal
- Detour Route
- Temporary Connector Road/Bridge
- Truck Detour Route





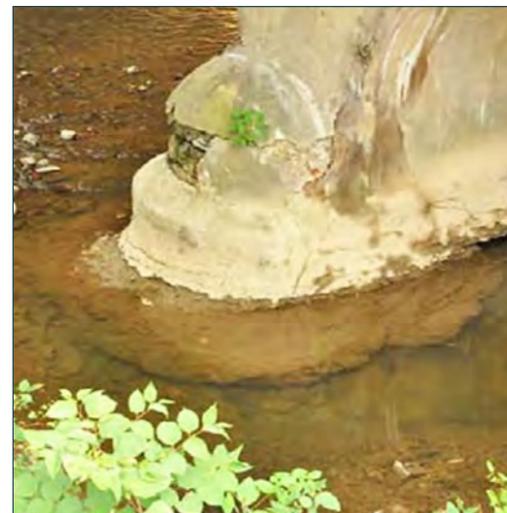
## Conditional Issues



**Exposed Original Stones**



**Overhanging Sidewalk Deterioration**



**Scour on Bridge Pier**

## History of Bridge

- Locally known as Monument Place Bridge, this bridge was constructed by Moses Shepherd in 1817 as part of the National Road. The bridge is also known as the Shepherd Bridge and Elm Grove Stone Arch Bridge.
- In 1931, the overhanging sidewalks were added.
- In 1958, a concrete veneer was applied over the stones.
- On August 21, 1981, the bridge was listed on the National Register of Historic Places (NRHP).

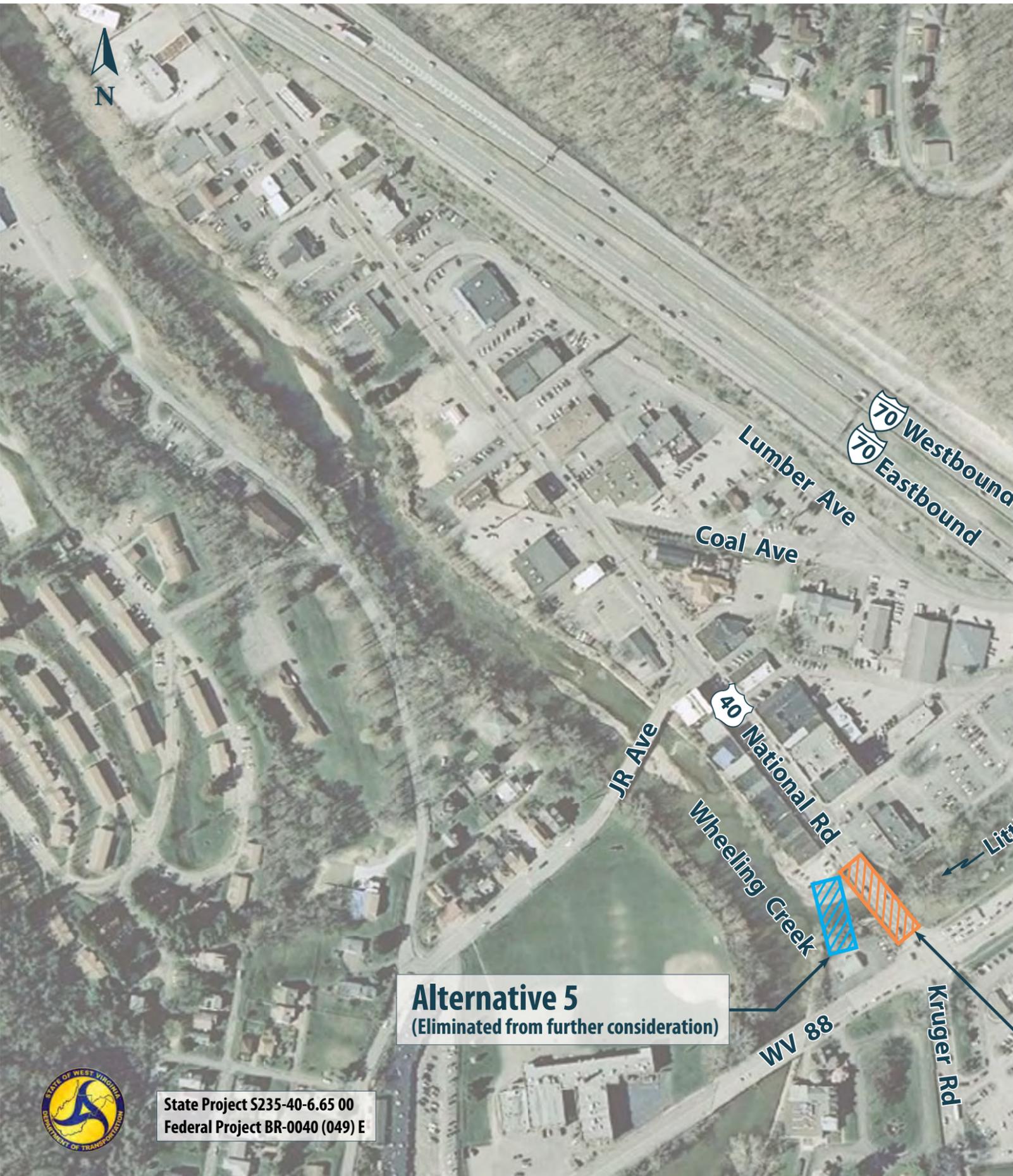
## Existing Conditions

- Existing traffic volume is 12,850 vehicles per day.
- Bridge has a posted weight limit of 16 tons for single-unit trucks and 32 tons for tractor trailer trucks.
- Concrete veneer is delaminating, exposing the underlying original stones.
- There is a loss of mortar between the exposed stones.
- The overhanging sidewalk is showing signs of deterioration.

## Project Schedule

- **July 2, 2012** - All public comments due to WVDOH.
- **Summer 2012** - Begin environmental studies.
- **Fall 2012** - Additional Public Meetings for Environmental Document.
- **2013 and Beyond** - Final Design of Preferred Alternative and Construction.





	Sidewalks	Three 12' Lanes	Two 12' Lanes	Detour	Construction Cost Estimate
No Build (existing bridge)	YES	X	-	-	*
Alternative 1A	YES	X	-	YES	\$4,278,000
Alternative 1B	YES	X	-	YES	\$3,024,000
Alternative 2	YES	X	-	YES	\$3,762,000
Alternative 3	YES	X	-	YES	\$4,837,000
Alternative 4	NO	-	X	NO	\$3,146,000
Alternative 5	Eliminated from further consideration				

\*The maintenance costs over time will significantly increase as the structure continues to deteriorate.

**Alternatives 1, 2, and 3** – Rehabilitate the existing bridge in its current location. Method and level of rehabilitation varies by alternative.

**Alternative 4** – Construct a new bridge over Little Wheeling Creek to the northeast of its existing location. Local roads would be upgraded to accommodate the traffic.

**Alternative 5** – Construct a new bridge over Little Wheeling Creek to the southwest of its existing location.

**Alternative 5**  
(Eliminated from further consideration)

**Alternative 4**

**Alternatives 1, 2 and 3**



# Public Comments

DATE: 5/31/12

Mr. Gregory L. Bailey, P.E.  
Director, Engineering Division  
West Virginia Division of Highways  
State Capitol Complex, Building 5  
1900 Kanawha Boulevard East  
Charleston, West Virginia 25305-0430

DATE: Thursday, May 31, 2012  
LOCATION: Bridge Street Middle School  
SUBJECT: INFORMATIONAL WORKSHOP PUBLIC MEETING  
PROJECT: Monument Place Bridge Rehabilitation/Replacement  
S335-40-6.65  
Wheeling, WV  
Ohio County

COMMENTS DUE BY Monday, July 2, 2012

Please consider the following comments:

I THINK THE BRIDGE SHOULD STAY USING  
ALTERNATIVE 1A or 1B

ALSO, THE LEFT TURN LANE ON RT. 40 TO KRUGER  
STREET NEEDS TO BE LONGER, TRAFFIC BACKS  
UP INTO THE STRAIGHT LANE.

(Please print the following information)

NAME: RITA HENTHORNE

ADDRESS:

ORGANIZATION (IF ANY):

How did you hear about the Informational Workshop Public Meeting?

ELM GROVE NEIGHBORHOOD WATCH

Project Information and Comment Sheets  
Can be found online at our web page [www.transportation.wv.gov](http://www.transportation.wv.gov).  
Click on Comments on Projects, Open, and then click on Monument Place Bridge  
Project.

DATE: 5/31/2012

Mr. Gregory L. Bailey, P.E.  
Director, Engineering Division  
West Virginia Division of Highways  
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S335-40-6.65  
Wheeling, WV  
Ohio County

COMMENTS DUE BY Monday, July 2, 2012

Please consider the following comments:

I favor Alternatives → 1 B 1<sup>st</sup> choice  
→ 1 A - 2<sup>nd</sup> choice  
→ 2 3<sup>rd</sup> choice  
Other plans (4) (5) - cancelled  
as Stone Bridge would be closed forever to vehicle traffic  
and have great impact on Lumber + Coal Avenue area.  
1B/1A/2 maintain existing traffic patterns

(Please print the following information)

NAME: Harold E. Vitalie

ADDRESS:



ORGANIZATION (IF ANY):

How did you hear about the Informational Workshop Public Meeting?

Newspaper

Project Information and Comment Sheets  
Can be found online at our web page [www.transportation.wv.gov](http://www.transportation.wv.gov).  
Click on Comments on Projects, Open, and then click on Monument Place Bridge  
Project.

DATE:

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S335-40-6.65  
Wheeling, WV  
Ohio County

COMMENTS DUE BY Monday, July 2, 2012

Please consider the following comments:

Wheeling has lost so much of its heritage. This bridge is a treasure. I will take to DOT at its word therefore that demo is not an option. Any alternative that preserves the bridge is acceptable, however I favor a scenario that will offer restoration so that the beautiful stone work is visible so that we and future generations can appreciate fully the beauty of this unique and irreplaceable bridge. Thank you.

Please do this project  
Consult engineer, historian  
restoration & preservation

(Please print the following information)

NAME: Sean Duffy

ADDRESS:

ORGANIZATION (IF ANY): Ohio County Public Library

How did you hear about the Informational Workshop Public Meeting?

From Wheeling National Heritage Area

DATE: 5/31/12

Mr. Gregory L. Bailey, P.E.  
Director, Engineering Division  
West Virginia Division of Highways  
State Capitol Complex, Building 5  
1900 Kanawha Boulevard East  
Charleston, West Virginia 25305-0430

DATE: Thursday, May 31, 2012  
LOCATION: Bridge Street Middle School  
SUBJECT: INFORMATIONAL WORKSHOP PUBLIC MEETING  
PROJECT: Monument Place Bridge Rehabilitation/Replacement  
S335-40-6.65  
Wheeling, WV  
Ohio County

COMMENTS DUE BY Monday, July 2, 2012

Please consider the following comments:

Proposed ALTERNATIVE 1-F WOULD SEEM TO BE THE MOST LOGICAL FOR THE TEMPORARY BRIDGE TO HANDLE ALL TRAFFIC WHILE THE STONE BRIDGE IS BEING REPAIRED. ALTERNATIVE 1-B WOULD BE THE BEST FOR USE FOR THE ACTUAL REPAIR. THE COAL AVE. TEMPORARY BRIDGES WOULD MAKE THE DETOUR LEAST LENGTHY.

(Please print the following information)

NAME: RAY A. MILLER

ADDRESS:

ORGANIZATION (IF ANY):

How did you hear about the Informational Workshop Public Meeting?

NEWS PAPER ARTICLE AND ANNOUNCEMENT @ CITY/COUNCIL MTG.

Project Information and Comment Sheets

Can be found online at our web page [www.transportation.wv.gov](http://www.transportation.wv.gov).

Click on Comments on Projects, Open, and then click on Monument Place Bridge Project.

DATE:

Mr. Gregory L. Bailey, P.E.  
Director, Engineering Division  
West Virginia Division of Highways  
State Capitol Complex, Building 5  
1900 Kanawha Boulevard East  
Charleston, West Virginia 25305-0430

DATE: Thursday, May 31, 2012  
LOCATION: Bridge Street Middle School  
SUBJECT: INFORMATIONAL WORKSHOP PUBLIC MEETING  
PROJECT: Monument Place Bridge Rehabilitation/Replacement  
S335-40-6.65  
Wheeling, WV  
Ohio County

COMMENTS DUE BY Monday, July 2, 2012

Please consider the following comments:

---

I'm in favor of Alt. #1A

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(Please print the following information)

NAME: Carl Shaffer  
ADDRESS: [REDACTED]

ORGANIZATION (IF ANY):

How did you hear about the Informational Workshop Public Meeting?

Neighborhood Watch group

**Project Information and Comment Sheets**  
Can be found online at our web page [www.transportation.wv.gov](http://www.transportation.wv.gov).  
Click on Comments on Projects, Open, and then click on Monument Place Bridge  
Project.

DATE: 5-31-12

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Director, Engineering Division  
West Virginia Division of Highways  
State Capitol Complex, Building 5  
1900 Kanawha Boulevard East  
Charleston, West Virginia 25305-0430

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PROJECT: Monument Place Bridge Rehabilitation/Replacement  
S335-40-6.65  
Wheeling, WV  
Ohio County

COMMENTS DUE BY Monday, July 2, 2012

Please consider the following comments:

I'd like a list of the names of the men who did the actual building since my great-grandfather, a stone mason from Scotland, worked on it. Also, if the bridge is demolished, would it be possible to get a stone from it. Stone masons sometimes signed a stone when working on a project.  
I'm in favor of alternative 1A. Thanks

(Please print the following information)

NAME: Ctea Shaffer

ADDRESS: [Redacted]

ORGANIZATION (IF ANY): —

How did you hear about the Informational Workshop Public Meeting?

At a meeting of our Neighborhood Watch Org.

Project Information and Comment Sheets  
Can be found online at our web page [www.transportation.wv.gov](http://www.transportation.wv.gov).  
Click on Comments on Projects, Open, and then click on Monument Place Bridge Project.

DATE: 5.31.12

Mr. Gregory L. Bailey, P.E.  
Director, Engineering Division  
West Virginia Division of Highways  
State Capitol Complex, Building 5  
1900 Kanawha Boulevard East  
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PROJECT: Monument Place Bridge Rehabilitation/Replacement  
S335-40-6.65  
Wheeling, WV  
Ohio County

COMMENTS DUE BY Monday, July 2, 2012

Please consider the following comments:

---

Alternative 1A w/ roundabout at intersection of  
40 + 88

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(Please print the following information)

NAME: Tom Connolly  
ADDRESS: City of Wheeling  
ORGANIZATION (IF ANY):

How did you hear about the Informational Workshop Public Meeting?

Project Information and Comment Sheets  
Can be found online at our web page [www.transportation.wv.gov](http://www.transportation.wv.gov).  
Click on Comments on Projects, Open, and then click on Monument Place Bridge  
Project.

DATE:

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West Virginia Division of Highways  
State Capitol Complex, Building 5  
1900 Kanawha Boulevard East  
Charleston, West Virginia 25305-0430

**DATE:** Thursday, May 31, 2012  
**LOCATION:** Bridge Street Middle School  
**SUBJECT:** INFORMATIONAL WORKSHOP PUBLIC MEETING  
**PROJECT:** Monument Place Bridge Rehabilitation/Replacement  
S335-40-6.65  
Wheeling, WV  
Ohio County

**COMMENTS DUE BY** Monday, July 2, 2012

Please consider the following comments:

---

- how to best minimize any negative impact, economically, on the local businesses?

---

- Provide as much transparency as possible, and if Delegate Ferns & myself can help transfer information to residents or collect questions from residents, please let us know.

(Please print the following information)

NAME: Erikka Storch

ADDRESS: [REDACTED]

ORGANIZATION (IF ANY): WV House of Delegates

How did you hear about the Informational Workshop Public Meeting?

Received letter inviting

**Project Information and Comment Sheets**  
Can be found online at our web page [www.transportation.wv.gov](http://www.transportation.wv.gov).  
Click on Comments on Projects, Open, and then click on Monument Place Bridge Project.

Jeremy S. Morris  
Wheeling National Heritage Area Corporation  
Executive Director  
304-232-3087  
[jmorris@wheelingeheritage.org](mailto:jmorris@wheelingeheritage.org)

The engineering document provides only a very brief description of the bridges historical and engineering significance. The National Register Nomination should be part of the appendices of the document.

The document makes no reference to the Secretary of Interior Standards for Restoration. The Secretary Standards should be part of the appendices. Additionally, only contractors who are experienced with National Register properties and experience in working Section 106 of the Historic Preservation Act should be allowed to bid on the project.

The document refers only to rehabilitation. This should be a restoration project as defined by the Secretary of Interior. It should and can be restored to its 1817 design intent while still meeting critical needs of the Department of Transportation or Federal Highway Administration. Shotcrete should be removed, damaged stones replaced, bridge should be repointed.

The bridge is significant in the broader context of National Road, our nation's first federally constructed "highway". Prior to this National Road we traveled by cow paths and hunting paths that were widened by wagons. There are few original artifacts remaining on the road today. However, the Monument Place bridge is one that is in the condition and position to be restored, as has been done with the Casselman Run's bridge in Maryland, other bridges in Ohio, Indiana, and Illinois along with the various toll houses of the road. Together these historic properties help define the original character of our nation's first road.

The Monument Place bridge is every bit as important as the Wheeling Suspension Bridge, not as monumental, but still a remaining artifact 19<sup>th</sup> century pre-Civil War engineering that deserves the care of restoration not simply a rehabilitation.

I provided the engineering document to Dr. Emory Kemp, professor emeritus of the WVU Civil Engineering Department for his review. He stated to me that it was a very competent report, but lacked the historical context necessary for proper restoration of the bridge. He also felt that structural steel could be shaped around the each of three ellipses of the bridge, 4-6 pieces of steel across the width of the bridge. This would help with load capacities; as well more modern granular backfill may help in load distribution.

Questions: What is the proposed weight limit?

What is the current traffic count?

Does there need to be two foot paths?

United States Department of the Interior  
Heritage Conservation and Recreation Service

For HCRS use only

National Register of Historic Places  
Inventory—Nomination Form

received

date entered

See instructions in *How to Complete National Register Forms*

Type all entries—complete applicable sections

1. Name

historic Elm Grove Stone Arch Bridge

and/or common "Monument Place Bridge"

2. Location

street & number U.S. Route 40 over Little Wheeling Creek not for publication

city, town Wheeling vicinity of congressional district First

state West Virginia code 54 county Ohio code 069

3. Classification

Category	Ownership	Status	Present Use
<input type="checkbox"/> district	<input checked="" type="checkbox"/> public	<input checked="" type="checkbox"/> occupied	<input type="checkbox"/> agriculture
<input type="checkbox"/> building(s)	<input type="checkbox"/> private	<input type="checkbox"/> unoccupied	<input type="checkbox"/> commercial
<input checked="" type="checkbox"/> structure	<input type="checkbox"/> both	<input type="checkbox"/> work in progress	<input type="checkbox"/> educational
<input type="checkbox"/> site	<b>Public Acquisition</b>	<b>Accessible</b>	<input type="checkbox"/> entertainment
<input type="checkbox"/> object	<input type="checkbox"/> in process	<input type="checkbox"/> yes: restricted	<input type="checkbox"/> government
	<input type="checkbox"/> being considered	<input checked="" type="checkbox"/> yes: unrestricted	<input type="checkbox"/> industrial
		<input type="checkbox"/> no	<input type="checkbox"/> military
			<input type="checkbox"/> museum
			<input type="checkbox"/> park
			<input type="checkbox"/> private residence
			<input type="checkbox"/> religious
			<input type="checkbox"/> scientific
			<input checked="" type="checkbox"/> transportation
			<input type="checkbox"/> other:

4. Owner of Property

name State of West Virginia, Dept. of Highways

street & number 1900 Washington St., East

city, town Charleston vicinity of state West Virginia 25301

5. Location of Legal Description

courthouse, registry of deeds, etc. Ohio County Courthouse

street & number 16th and Chapline Streets

city, town Wheeling state West Virginia 26001

6. Representation in Existing Surveys

Historic American Building Survey (HABS)  
title Historic American Engineering Record (HAER) has this property been determined eligible?  yes  no

date HABS-1933, HAER-1973  federal  state  county  local

depository for survey records Library of Congress

city, town Washington state D.C. 20243

## 7. Description

<b>Condition</b>		<b>Check one</b>	<b>Check one</b>
<input type="checkbox"/> excellent	<input type="checkbox"/> deteriorated	<input type="checkbox"/> unaltered	<input checked="" type="checkbox"/> original site
<input checked="" type="checkbox"/> good	<input type="checkbox"/> ruins	<input checked="" type="checkbox"/> altered	<input type="checkbox"/> moved date _____
<input type="checkbox"/> fair	<input type="checkbox"/> unexposed		

### Describe the present and original (if known) physical appearance

The Elm Grove Stone Arch Bridge spans Little Wheeling Creek, carrying present-day U.S. Route 40 in a northwest-southwest direction, in the community of Elm Grove, adjacent to Wheeling, Ohio County, West Virginia.

The Elm Grove Stone Arch Bridge or, as it is more commonly known, the "Monument Place Bridge", was constructed in 1817 by prominent Ohio Countian Moses Shepherd acting under contract from the United States government to build the Ohio County bridges that would carry the National Road. That the National Road crossed Little Wheeling Creek at this place is a part of its historic significance (see Section 3).

The bridge is a three (3) span stone arch bridge. The arches are formed in an ellipse, rather than being semicircular as was then common, in order to keep the bridge from becoming excessively high in the middle (or being "humpbacked").

The Elm Grove Stone Arch Bridge is built of uncoarsed limestone and each of the three segmental arches are delineated with smooth-surfaced, but irregular width stones. The voussiors form low round-ended piers that have coned-shaped buttresses carried into the solid masonry spandrels. This bridge is 208 feet in length, while the center arch has a 38 feet span length and the two outer arches span 25 feet in length. The Elm Grove Stone Arch Bridge well preserveseearly American engineering and masonry craftsmanship.

The Elm Grove Bridge is now a part of busy U.S. Route 40. The original 1817 parapets were removed in 1931 and replaced by sidewalks and concrete balustraded gaurdrails, bringing the total width of the bridge to 48 feet. The bridge was sprayed with gunite in 1953, in all probability due to questions as to its structural stability.

With the exception of these aforementioned alterations, and the asphalt paving, the historic Elm Grove Stone Arch Bridge stands as it did when completed in 1817 to carry the National Road.



UNITED STATES DEPARTMENT OF THE INTERIOR  
HERITAGE CONSERVATION AND RECREATION SERVICE

FOR HCRS USE ONLY
RECEIVED
DATE ENTERED

# NATIONAL REGISTER OF HISTORIC PLACES INVENTORY -- NOMINATION FORM

Elm Grove Stone Arch Bridge, Wheeling, Ohio County, West Virginia

CONTINUATION SHEET

ITEM NUMBER 8 PAGE 2

that the National Road pass by their home, the original design plan of the National Road, which ran along the north side of Little Wheeling Creek, was altered so that the road deviated to cross Little Wheeling Creek and then recross the stream in front of Shepherd Hall before resuming northwest to the Ohio River at Wheeling. To accomplish this, two bridges had to be constructed; one at Tridelpia (mentioned above) and the Elm Grove Stone Arch Bridge. Moses Shepherd built both these bridges in 1817 and the National Road reached Wheeling the following year. In 1820, in order to show his appreciation and to recognize his efforts in championing the National Road, Moses Shepherd commissioned an elaborate monument to Henry Clay to be erected on the grounds of Shepherd Hall. This monument was unveiled in Clay's presence that year and stood in place until recent years, giving Shepherd Hall its common name of "Monument Place"; hence, the "Monument Place Bridge" as the Elm Grove bridge is sometimes known.

During its "lifetime" the Elm Grove Stone Arch Bridge has "seen" many prominent individuals cross over it. It is known that such individuals as Clay, Daniel Webster, Andrew Jackson, James K. Polk, W. H. Harrison, Zackary Taylor, the Marquiss de Lafayette and others were visitors at Shepherd Hall and must have admired the graceful triple arch stone structure.

The Elm Grove Stone Arch Bridge is significant, therefore, as West Virginia's oldest existing bridge and for its close association with the great National Road and the many significant individuals in our state and national history who had a hand in its creation.

UNITED STATES DEPARTMENT OF THE INTERIOR  
HERITAGE CONSERVATION AND RECREATION SERVICE

FOR HCRS USE ONLY

RECEIVED

DATE ENTERED

**NATIONAL REGISTER OF HISTORIC PLACES  
INVENTORY -- NOMINATION FORM**

Elm Grove Stone Arch Bridge, Ohio County, West Virginia

CONTINUATION SHEET

ITEM NUMBER 9 PAGE 2

Jordan, Philip D., The National Road, Bobbs-Merrill Co., Indianapolis, c. 1943

Lewis, Clifford M., S.J., "Shepherd Hall", National Register of Historic Places  
Nomination, September, 1970.

Wingerter, Charles A., History of Greater Wheeling and Vicinity, 2 vols., Chicago,  
c.1912.

## 9. Major Bibliographical References

Correspondence from Thomas A Bryant, II, District Engineer, WV Dept. of Highways,  
May 23, 1980, August 13, 1980  
Ellifritt, Duane, "Early Engineering In the Hills", West Virginia Hillbilly,  
Richwood, WV, April 15, 1978

## 10. Geographical Data

Acreage of nominated property less than 1/2 acre

Quadrangle name Wheeling, WV

Quadrangle scale 1:24,000

UMT References

A	<u>1</u> <u>7</u>	<u>5</u> <u>2</u> <u>9</u> <u>1</u> <u>1</u> <u>0</u>	<u>4</u> <u>4</u> <u>3</u> <u>2</u> <u>4</u> <u>4</u> <u>0</u>	B						
	Zone	Easting	Northing		Zone	Easting	Northing			
C				D						
E				F						
G				H						

Verbal boundary description and justification The Elm Grove Bridge is located on U.S. Route 40 over Little Wheeling Creek 0.05 mile west of Junction W.Va. 88. This site being 208' from end to end of the bridge with a width of 60', being the W.Va. Dept. of Highways R/W. This area of 0.29 acre.

List all states and counties for properties overlapping state or county boundaries

state	code	county	code
state	code	county	code

## 11. Form Prepared By

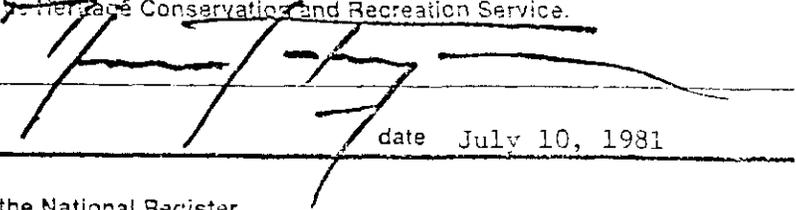
name/title Michael J. Pauley, Historian, and W. Neil Richardson, Engineering Conservator  
Historic Preservation Unit  
organization WV Dept. of Culture & History date July 10, 1981  
Science and Cultural Center  
street & number Capitol Complex telephone 348-0240  
city or town Charleston state West Virginia

## 12. State Historic Preservation Officer Certification

The evaluated significance of this property within the state is:

national  state  local

As the designated State Historic Preservation Officer for the National Historic Preservation Act of 1966 (Public Law 89-665), I hereby nominate this property for inclusion in the National Register and certify that it has been evaluated according to the criteria and procedures set forth by the Heritage Conservation and Recreation Service.

State Historic Preservation Officer signature 

title SAPO date July 10, 1981

For HGRS use only

I hereby certify that this property is included in the National Register

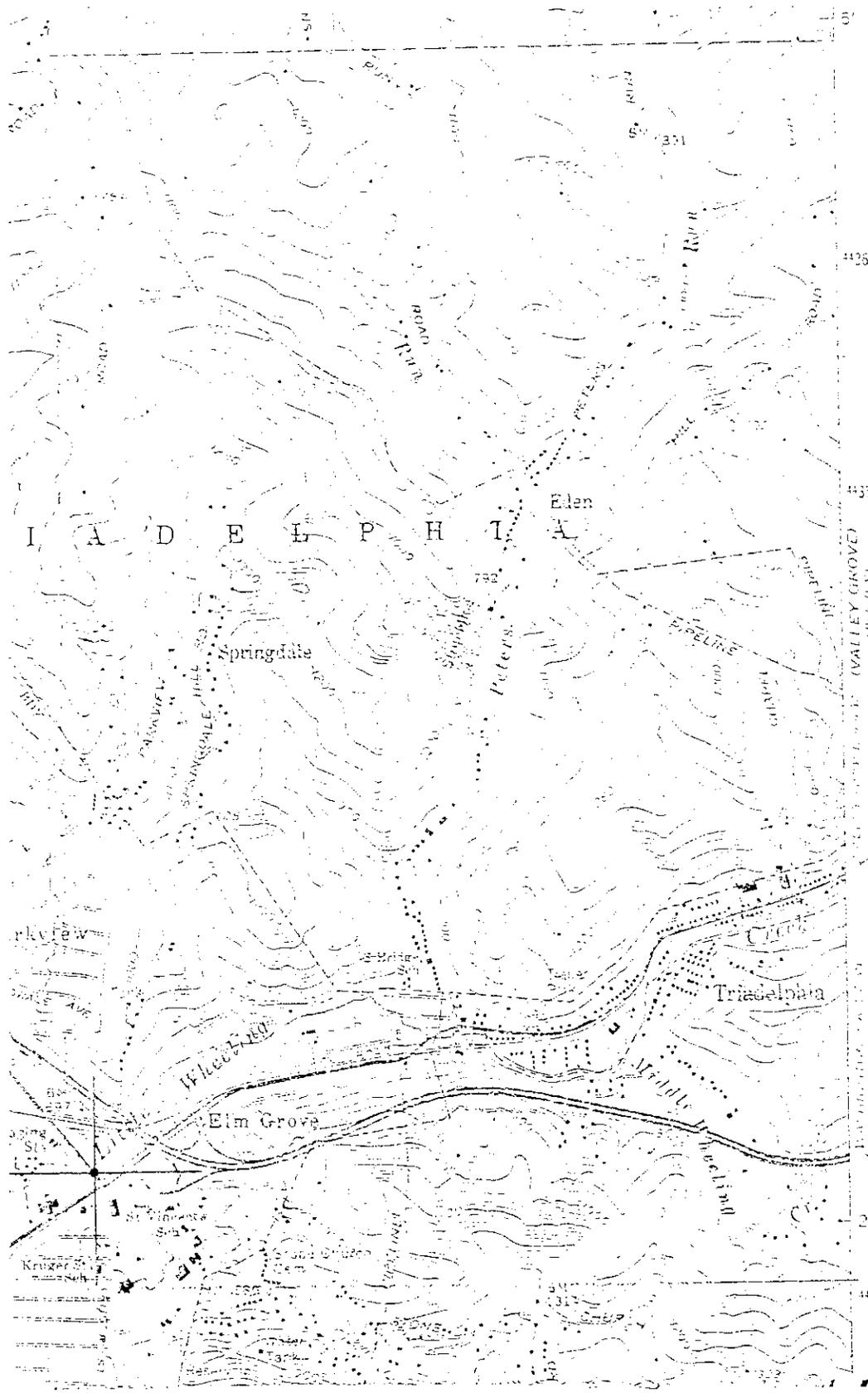
date

Keeper of the National Register

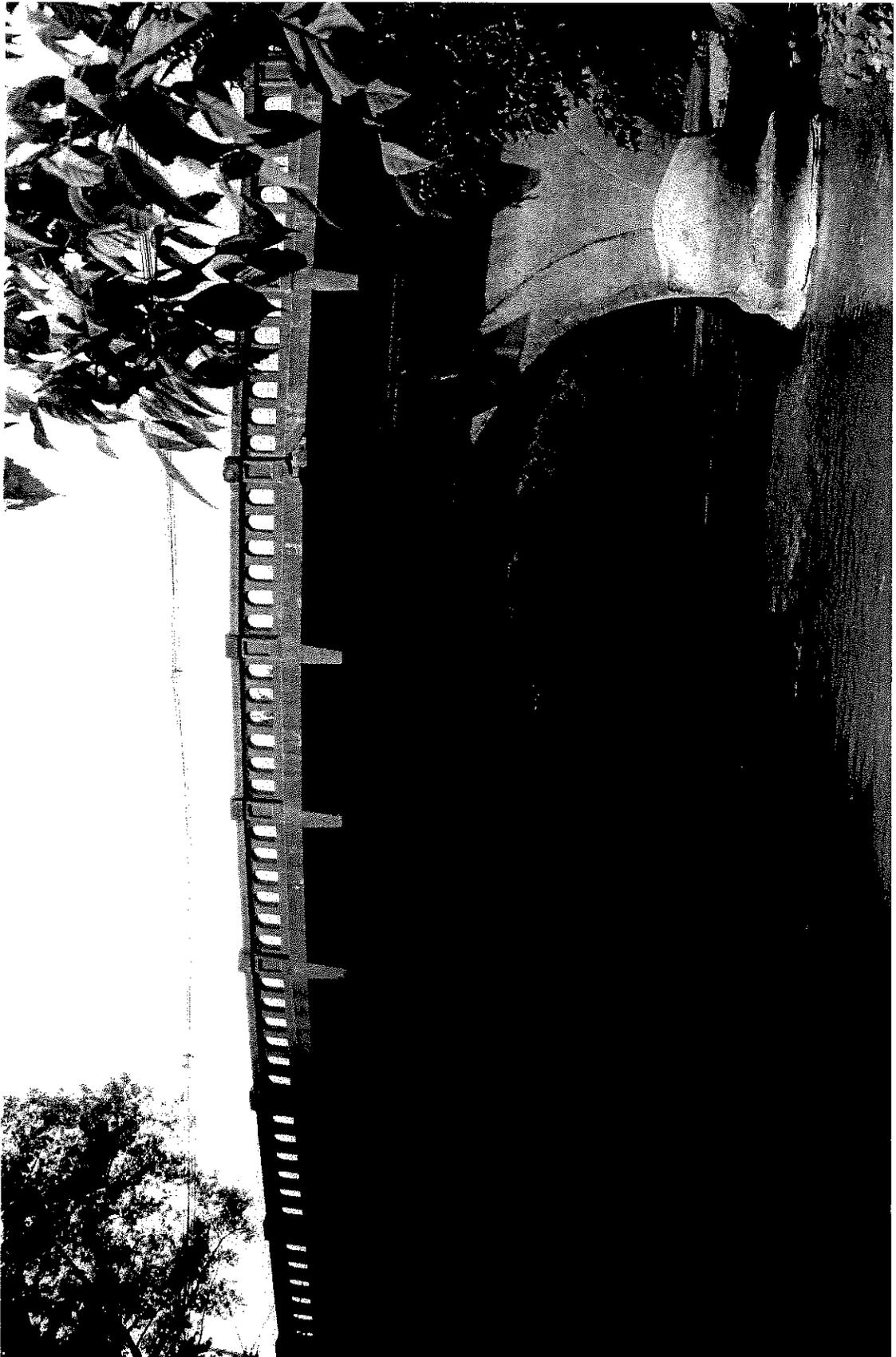
Attest:

date

Chief of Registration



Elm Grove  
 Stone Arch Bridge  
 Viscosity  
 O. W. ...  
 West Virginia  
 UTAH  
 17/527110/4432447



DATE: 5/31/2012

Mr. Gregory L. Bailey, P.E.  
Director, Engineering Division  
West Virginia Division of Highways  
State Capitol Complex, Building 5  
1900 Kanawha Boulevard East  
Charleston, West Virginia 25305-0430

DATE: Thursday, May 31, 2012  
LOCATION: Bridge Street Middle School  
SUBJECT: INFORMATIONAL WORKSHOP PUBLIC MEETING  
PROJECT: Monument Place Bridge Rehabilitation/Replacement  
S335-40-6.65  
Wheeling, WV  
Ohio County

COMMENTS DUE BY Monday, July 2, 2012

Please consider the following comments:

*The proposed reroute of Rt 40 isn't viable for Elm Grove Businesses. (ie when Rt 70 removed Elm Grove!) Alternative 3 seems best - if it costs more consider the US. Gov't & \$3500 hammers. Also Alternative #2 is viable. Don't destroy - Rebuild.*

(Please print the following information)

NAME: HENRY L. CASTILLO, SR.

*see reverse* →

ADDRESS: [Redacted]

ORGANIZATION (IF ANY):

How did you hear about the Informational Workshop Public Meeting?

*Newspaper.*

**Project Information and Comment Sheets**  
Can be found online at our web page [www.transportation.wv.gov](http://www.transportation.wv.gov).  
Click on Comments on Projects, Open, and then click on Monument Place Bridge Project.

Alternative 1A will result (inevitably) in the Stone Bridge being removed & a new one put in its place.

However - that would maintain the current traffic pattern (nick)

DATE:



**Timothy B. Birch**  
 (304) 234-3838 office  
 (304) 234-3840 fax  
 (304) 639-4433 cell  
 timbir2@yahoo.com email

Mr. Gregory L. Bailey, P.E.  
 Director, Engineering Division  
 West Virginia Division of Highways  
 State Capitol Complex, Building 5  
 1900 Kanawha Boulevard East  
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 S335-40-6.65  
 Wheeling, WV  
 Ohio County

**COMMENTS DUE BY** Monday, July 2, 2012

Please consider the following comments:

Detour Traffic down Coal St. (This is an old RR  
Bed that can handle the weight) onto Lumber Ave. Widen  
Lumber Avenue to accept a left turn only lane (To go to  
Shilling Bridge) and a Right turn to Cross A temporary  
Bridge Under I-70 (Alternate #4 Bridge) Back to US-40.  
This has more sweeping turns for large trucks and would  
take traffic out of turning conflict areas (Shilling Bridge)...

(Please print the following information)

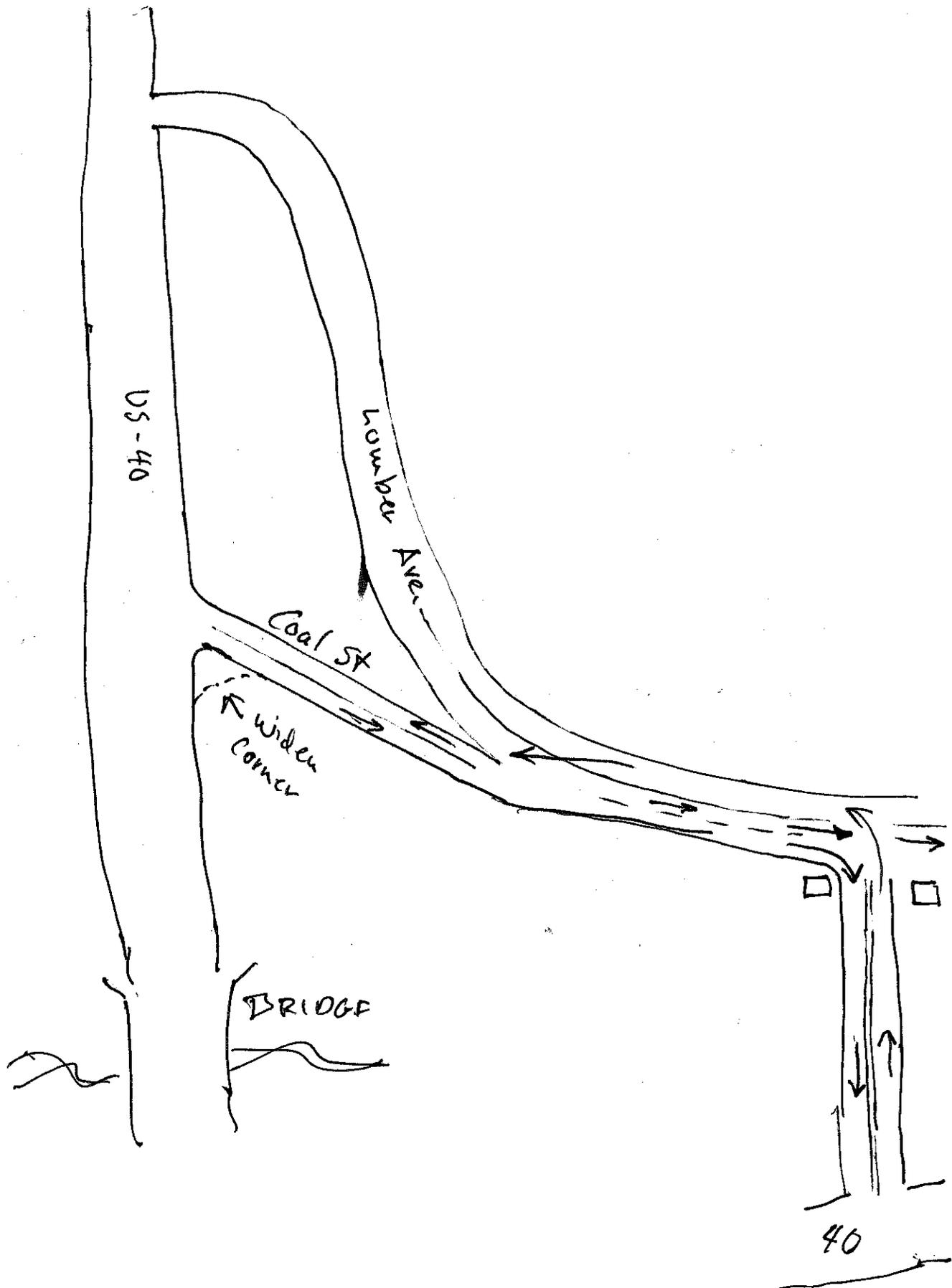
**NAME:** Tim BIRCH (City of Wheeling) = (OVER) =

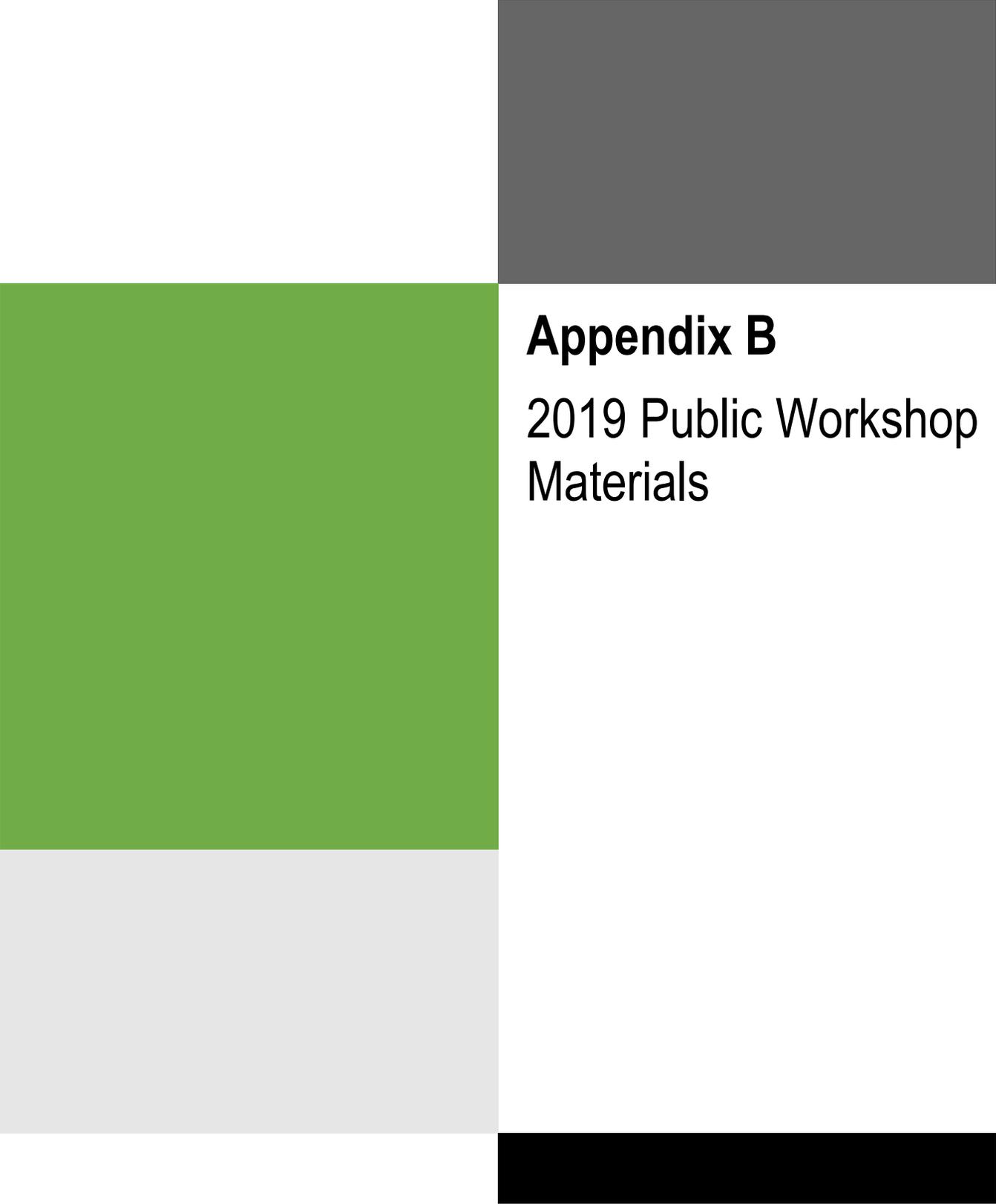
**ADDRESS:** [REDACTED]

**ORGANIZATION (IF ANY):** City of Wheeling

**How did you hear about the Informational Workshop Public Meeting?**

City Manager sent Me ...





## **Appendix B**

### 2019 Public Workshop Materials

# Public Meeting Notice

This flyer was posted at the  
bridge in advance of the public  
meeting.

## **NOTICE**

# **INFORMATIONAL WORKSHOP PUBLIC MEETING MONUMENT PLACE BRIDGE**

Tuesday, March 19, 2019

Independence Hall

1528 Market St, Wheeling, WV 26003

**NO FORMAL PRESENTATION WILL BE MADE.** The public meeting is from **4:00 to 7:00 p.m.** and the public will be afforded the opportunity to ask questions and give written comments on the project throughout the meeting.

Flyer

**NOTICE**  
**OF**  
**INFORMATIONAL WORKSHOP PUBLIC MEETING**  
**And Availability of the Approved Environmental Assessment**

**MONUMENT PLACE BRIDGE**  
**STATE PROJECT: S235-40-6.65 00**  
**FEDERAL PROJECT: STP-0040(049)D**  
**OHIO COUNTY, WEST VIRGINIA**

The West Virginia Division of Highways (WVDOH) will hold an informational public meeting on Tuesday, March 19, 2019 at Independence Hall, located at 1528 Market St, Wheeling, WV 26003 on the proposed rehabilitation to the Monument Place Bridge. This project includes the rehabilitation of the Monument Place Bridge, located on US 40 (National Road) in Elm Grove. This meeting complies with the public involvement requirements of the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act, and Section 4(f) of U.S. Department of Transportation (USDOT) Act of 1966.

**NO FORMAL PRESENTATION WILL BE MADE.** The scheduled public meeting is from 4:00 to 7:00 p.m. and the public will be afforded the opportunity to ask questions and give written comments on the project throughout the meeting. A handout with project details will be available at the meeting and on the WVDOH Website.

Those wishing to file written comments may send them to Mr. RJ Scites, P.E., Director, Engineering Division, West Virginia Division of Highways, 1334 Smith Street, Charleston, West Virginia 25301 on or before Friday, April 19, 2019. Visit the WVDOH Website at <http://go.wv.gov/dotcomment> for project information and the opportunity to comment on the project.

**The West Virginia Department of Transportation will, upon request, provide reasonable accommodations including auxiliary aids and services necessary to afford an individual with a disability an equal opportunity to participate in our services, programs and activities. Please contact us at (304) 558-3931. Persons with hearing or speech impairments can reach all state agencies by calling (800) 982-8772 (voice to TDD) or (800) 982-8771 (TDD to voice), toll free.**

WVDOT Project Website



[Transportation](#) > [Highways](#) > [Divisions](#) > [Engineering](#) > [Comment on Projects](#) > [Closed](#) > [Monument Place Bridge](#)

## Monument Place Bridge

State Project Number: S235-40-6.65.00

Federal Project Number: STP-0040(049/D

The West Virginia Division of Highways (WVDOT) will hold an informational public meeting on Tuesday March 19, 2019 at Independence Hall, located at 1528 Market Street, Wheeling, WV 26003 on the proposed rehabilitation of the Monument Place Bridge. This project includes the rehabilitation of the Monument Place Bridge, located on US 40 (National Road) in Elm Grove. This meeting complies with the public involvement requirements of the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act, and Section 4(f) of U.S. Department of Transportation (USDOT) Act of 1966.

**NO FORMAL PRESENTATION WILL BE MADE.** The scheduled public meeting is from 4:00 to 7:00 p.m. and the public will be afforded the opportunity to ask questions and give written comments on the project throughout the meeting. A [handout](#) with project details will be available at the meeting.

### Documents

[Environmental Assessment \(77.6 MB PDF\)](#)

[Meeting Boards](#)

[Pedestrian Questionnaire](#)

### Comment

You may comment [online](#) or [in writing](#). Comments are due by April 19, 2019. Those wishing to submit written comments may send them to

Mr. R.J. Scates, P.E.  
Director, Engineering Division  
West Virginia Division of Highways  
1334 Smith Street  
Charleston, West Virginia 25301

The West Virginia Department of Transportation will, upon request, provide reasonable accommodations including auxiliary aids and services necessary to afford an individual with a disability an equal opportunity to participate in our services, programs and activities. Please contact us at [304 558-3931](tel:3045583931). Persons with hearing or speech impairments can reach all state agencies by calling [800 982-8772](tel:8009828772) (voice to TDD) or [800 982-8771](tel:8009828771) (TDD to voice), toll free.

# Attendance Sheets



WEST VIRGINIA DEPARTMENT OF TRANSPORTATION  
DIVISION OF HIGHWAYS

PUBLIC MEETING ATTENDANCE SHEET

PROJECT: Monument Place Bridge Rehabilitation/Replacement

DATE: March 19, 2019

State Project: S235-40-6.65 00

Federal Project: STP-0040(049)D

Ohio County, West Virginia

LOCATION:

Name of venue: Independence Hall

Address: 1528 Market Street

Wheeling, West Virginia

PLEASE PRINT

NAME ORGANIZATION and EMAIL/ADDRESS

- 1. Jesse Mostrovi c City
- 2. Tom Connolly City [REDACTED]
- 3. Philip Stahl City of Wheeling [REDACTED]
- 4. Dave PALMEA City of Wkg - Council
- 5. Anthony Conn WTOV9
- 6. Robert Hicks WTOV9
- 7. MARTIN KimBALL POLICE
- 8. BRIAN HARTO OHIO County SCHOOLS
- 9. Erika Storch WRAOUC
- 10. Logan Patyk WTRF - 7
- 11. Sarah Fitzpatrick
- 12. Aurora Drake
- 13. Cindy ~~St~~ Fitzpatrick
- 14. MICHAEL P. HAMILTON
- 15. Jeanne Finstein Friends of Wheeling





**NAME**

**ORGANIZATION and EMAIL/ADDRESS**

16. *KAREN KUHENS*

17.

18.

19.

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36.



Handout

# Monument Place Bridge

State Project No. S235-40-6.65 00

Federal Project No. STP-0040(049)D

## Public Meeting – Welcome

Thank you for participating in the public meeting for the Monument Place Bridge in Wheeling, WV. This meeting is being hosted by the West Virginia Division of Highways (WVDOH) to present the results of the Environmental Assessment (EA) for the project and to collect public opinion and comments on the document.

This meeting is from 4:00 pm to 7:00 pm on Tuesday, March 19, 2019 in Independence Hall in Wheeling, WV. The public meeting intends to maximize the interaction between the citizens and the project team. We invite you to browse the displays and encourage discussions with the project team. There are comment sheets available at the information desk. Please submit your comments at the meeting, by mail, or via the WVDOH website at <http://go.wv.gov/dotcomment>.

## Project Background

The Monument Place Bridge is located on US 40 over Little Wheeling Creek. It was part of the original US 40/National Road and is one of only two (along with the Wheeling Suspension Bridge) existing bridges in West Virginia from that historic facility. Constructed in 1817, this structure is the oldest bridge in West Virginia, and is among the oldest bridges in the country. It was inducted into the National Register of Historic Places in 1981. The bridge is a unique and rare example of a stone arch that features the elliptical style of arch geometry. The three-span structure was modified in 1931 when the concrete sidewalks were added. In 1958, a concrete veneer was applied over the stone, giving it the appearance of a concrete arch bridge. Over time, portions of the veneer had fallen exposing the limestone masonry underneath. The veneer failed to prevent scour or erosion of the bridge supports below the level of the creek. Also, the scour undermined an abutment and two bridge piers. The sidewalk overhangs and support brackets show extensive deterioration resulting in weight limits that will decrease as the structure continues to deteriorate. The bridge needs to be rehabilitated or replaced so that traffic carried by US 40 can continue to serve Elm Grove and connect Elm Grove with I-70 at Exits 4 and 5, as well as downtown Wheeling, Bethlehem, and Triadelphia, West Virginia.

## Project Purpose

In order to ensure that US 40 continues to convey vehicular and pedestrian traffic through the unincorporated community of Elm Grove, remains safe for pedestrian and vehicular travel, and maintains the continuity of the local transportation system, the Monument Place Bridge will either need to be rehabilitated or replaced at a new location. The need for this project arises from the fact that the stone arch bridge is exhibiting signs of deterioration, resulting in weight limits that will decrease as the structure continues to deteriorate.

The purpose of this project is to present the Preferred Alternative (Rehabilitation). Five build alternatives, one Transportation System Management alternative, and the No-Build Alternative were developed and compared from a design and cost perspective. Five of these seven alternatives were eliminated from further consideration since they did not meet the purpose and need. As a result, one Build Alternative (Bridge Rehabilitation) and the No-Build Alternative were evaluated in the EA.





## Selection of the Preferred Alternative

Build Alternative 1 (Bridge Rehabilitation) was selected as the Preferred Alternative because:

- It meets the Purpose and Need.
- It provides the best design solutions and is most cost effective compared to other alternatives.
- It is anticipated that no permanent right-of-way acquisition will be needed and does not have constructability issues.

## Summary of Impacts of the Preferred Alternative

Environmental Resource Category	Impacts
Right-of-way Acquisition	Six temporary construction easements (6,970 ft <sup>2</sup> or 0.16 ac)
Community Facilities/Services	Temporary re-route of local bus service during construction.
Pedestrian Facilities/Community Cohesion	Temporary impact to pedestrian facilities during construction. Reasonable pedestrian accommodations will be provided.
Change in Travel Patterns	No permanent impact to automobile or bus traffic; temporary detour during construction is required. The Preferred Alternative will also change pedestrian traffic since the existing bridge will not be available for use during construction. Reasonable pedestrian accommodations will be provided.
Historic Resources	<p>Adverse effect to the historic Monument Place Bridge. A Memorandum of Agreement (MOA) with stipulations for mitigation has been developed. WVDOH will abide by these stipulations.</p> <p>This alternative will also have temporary visual and audible effects on the identified historic resources as a result of the bridge construction, temporary detours, and re-routing of traffic.</p>
Section 4(f) Properties	A Section 4(f) use will occur due to the adverse effect to the historic property. WVDOH will abide by the stipulations of the MOA for historic resources.
100-year Floodplain	The following impacts are based on the construction area for the Preferred Alternative less the stream channel area below the bridge span: 18,731 ft <sup>2</sup> (0.43ac)
500-year Floodplain	17,860 ft <sup>2</sup> (0.41 ac)
Wetlands/Streams	5,227 ft <sup>2</sup> (0.12 ac) of permanent impact to Little Wheeling Creek
Water Quality	Temporary impacts during construction
Vegetation and Wildlife	Minor impacts
Rare, Threatened, and Endangered Species	Unlikely impacts to northern long-eared bats. Regarding the presence or absence of mussel species, WVDOH will conduct a mussel survey to determine their presence prior to construction.
Energy	Minor impacts



## Monument Place Bridge Public Meeting

Environmental Resource Category	Impacts
Aesthetics and Visual Resources	The Preferred Alternative will result in changes to aesthetics or visual resources since rehabilitation efforts cannot completely follow the Secretary of Interior's Standards for Rehabilitation. The stipulations discussed in the Memorandum of Agreement will be followed.
Air Quality	Temporary impact as a result of increased pollutants during construction.
Noise	Temporary impacts during construction.
Traffic Capacity	Temporary impacts during construction due to closure of existing bridge.
Secondary Impacts	See the public meeting boards and the Environmental Assessment.
Cumulative Impacts	See the Environmental Assessment.
Environmental Justice Residential/Business Displacements Bicycle Facilities Land Use Archaeological Resources Wild and Scenic Rivers Natural and Wild Areas Prime and Unique Farmland Geologic Resources Groundwater Waste Sites	No impacts
<b>Cost Estimate</b> \$5,795,000	

## Traffic Detour during Construction

The Preferred Alternative will require a temporary automobile and truck detour of traffic during construction. The I-70 detour routes westbound traffic to Exit 2B (Washington Avenue) and then to I-70 eastbound to Exit 4 (WV 88 South/Elm Grove). I-70 eastbound traffic will use Exit 4 (WV 88 South/Elm Grove), and I-470 eastbound traffic will use Exit 5 (US 40/Elm Grove/Triadelphia) and then follow the I-70 westbound detour described above. The detour is depicted in the public meeting boards.

Contract plans will include a requirement for contractors to provide reasonable accommodations for pedestrian access during construction.

## Project Schedule

- **April 19, 2019** – Public comments are due to WVDOH.
- **June 2019** – Environmental clearance/FONSI issued.
- **Fall/Winter 2019** – Final design is complete.
- **Early 2020** – Construction starts.
- **Early 2021** – Construction ends.

*This public meeting complies with the public involvement requirements of the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act, and Section 4(f) of U.S. Department of Transportation Act of 1966.*





## Environmental Features

The figure below depicts the environmental features near the Monument Place Bridge, which are:

- Three hazardous waste sites are near the bridge. However, none appear to warrant further investigation given the character of the properties and their distance to the bridge (see the Environmental Assessment for additional information).
- The bridge is located within the 100-year floodplain.
- Wheeling Creek and Little Wheeling Creek are listed in the National Wetland Inventory.



## Why Should You Be Involved in the Project?

Comments on this project and its potential impacts are requested from the public to assist in the study and development of the recommendations. The comments and suggestions you provide are important so WVDOH involved can hear the concerns of the people who live and work in the area. Your input will be used to guide the study team as the project moves forward.

**Comments are due April 19, 2019  
and should be sent to the following:**

Mr. RJ Scites, P.E., Director Engineering Division  
West Virginia Division of Highways  
1334 Smith Street  
Charleston, West Virginia 25301  
Or electronically at <http://go.wv.gov/dotcomment>



# Boards



## Bridge Existing Conditions

- The Monument Place Bridge was constructed in 1817 (the oldest bridge in West Virginia).
- It is a unique example of a stone arch that features the elliptical style of arch geometry.
- The concrete veneer has delaminated, exposing the limestone masonry underneath. Portions of this veneer have been removed to perform testing on the stone.
- The sidewalk overhangs and support brackets show extensive deterioration.

## Summary of the Preferred Alternative

- The alternative selected is the rehabilitation of the bridge to support three 12-foot travel lanes and a 5-foot-wide sidewalk on each side.
- New pedestrian barriers with railings and concrete treatment will be constructed.

## Project Schedule

- **April 19, 2019** – Public comments are due to WVDOH.
- **June 2019** – Environmental clearance/FONSI issued.
- **Fall/Winter 2019** – Final design is complete.
- **Early 2020** – Construction starts.
- **Early 2021** – Construction ends.

*This public meeting complies with the public involvement requirements of the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act, and Section 4(f) of U.S. Department of Transportation Act of 1966.*

## Current Condition



Sidewalk overhang deterioration



Bridge deterioration prior to veneer removal





**LEGEND**

	MONUMENT PLACE BRIDGE		Environmental Protection Agency RCRA Site
	National Register of Historic Places Site		Leaking Underground Storage Tank
	Post Office		Preferred Alternative Footprint
	School		100-year Floodplain
			National Wetland Inventory (1982)

0 250 500 FEET



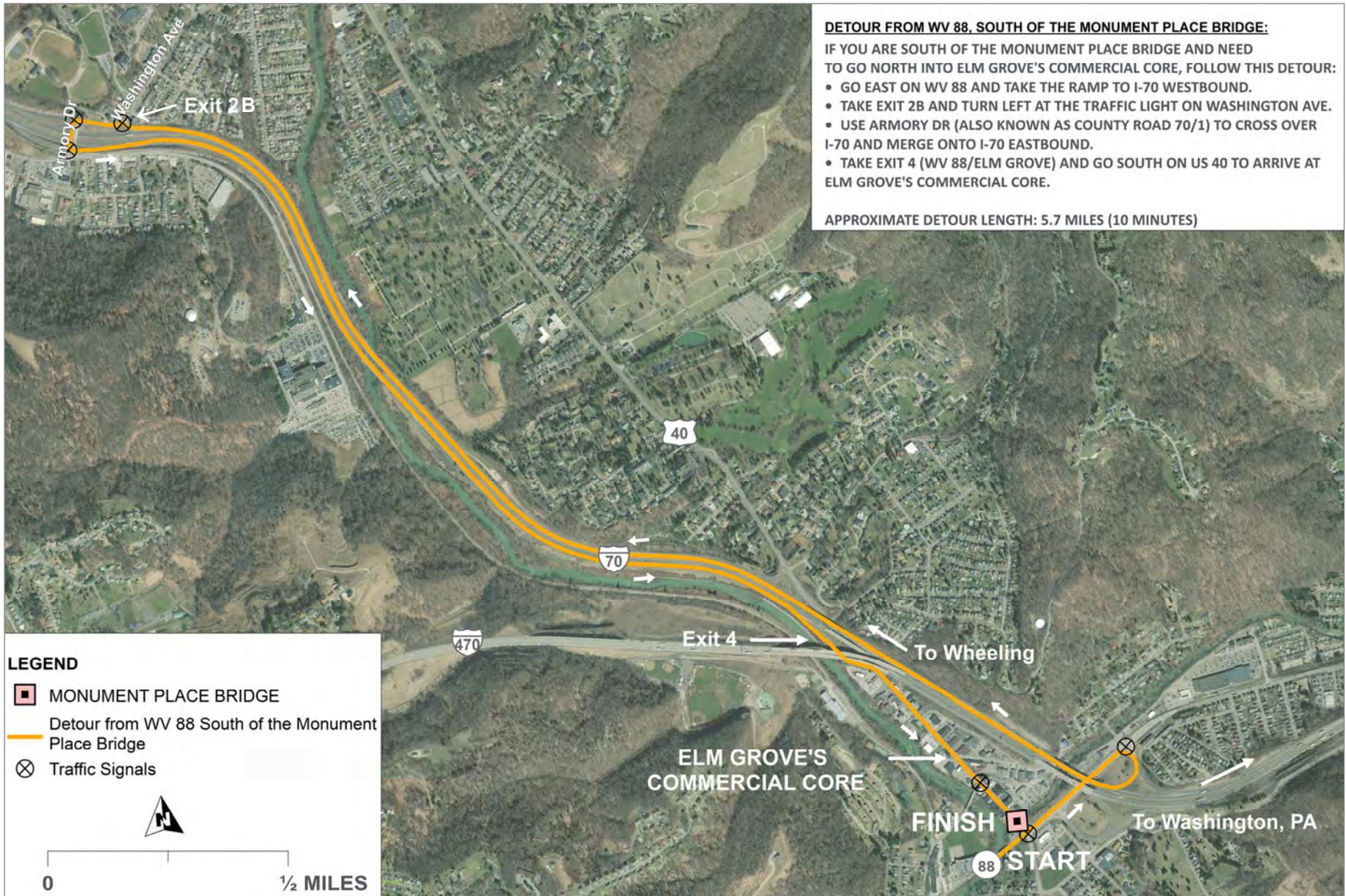


Environmental Resource Category	Preferred Alternative Impacts
Right-of-way Acquisition	Six temporary construction easements (6,970 ft <sup>2</sup> or 0.16 ac)
Community Facilities/Services	Temporary re-route of local bus service during construction.
Pedestrian Facilities	Temporary impact to pedestrian facilities during construction. Reasonable pedestrian accommodations will be provided.
Change in Travel Patterns	No permanent impact to automobile or bus traffic; temporary detour during construction is required. The Preferred Alternative will also change pedestrian traffic since the existing bridge will not be available for use during construction. Reasonable pedestrian accommodations will be provided.
Historic Resources	Adverse effect to the historic Monument Place Bridge. A Memorandum of Agreement (MOA) with stipulations for mitigation has been developed. WVDOH will abide by these stipulations.  This alternative will also have temporary visual and audible effects on the identified historic resources as a result of the bridge construction, temporary detours, and re-routing of traffic.
Section 4(f) Properties	A Section 4(f) use will occur due to the adverse effect to the historic property. WVDOH will abide by the stipulations of the MOA for historic resources.
100-year Floodplain	The following impacts are based on the construction area for the Preferred Alternative less the stream channel area below the bridge span:  18,731 ft <sup>2</sup> (0.43ac)
500-year Floodplain	17,860 ft <sup>2</sup> (0.41 ac)
Wetlands/Streams	5,227 ft <sup>2</sup> (0.12 ac) of permanent impact to Little Wheeling Creek
Water Quality	Temporary impacts during construction
Vegetation	Minor impacts
Wildlife	Minor impacts
Rare, Threatened, and Endangered Species	Unlikely impacts to northern long-eared bats. Regarding the presence or absence of mussel species, WVDOH will conduct a mussel survey to determine their presence prior to construction.
Aesthetics and Visual Resources	The Preferred Alternative will result in changes to aesthetics or visual resources since rehabilitation efforts cannot completely follow the Secretary of Interior's Standards for Rehabilitation. The stipulations discussed in the Memorandum of Agreement will be followed.

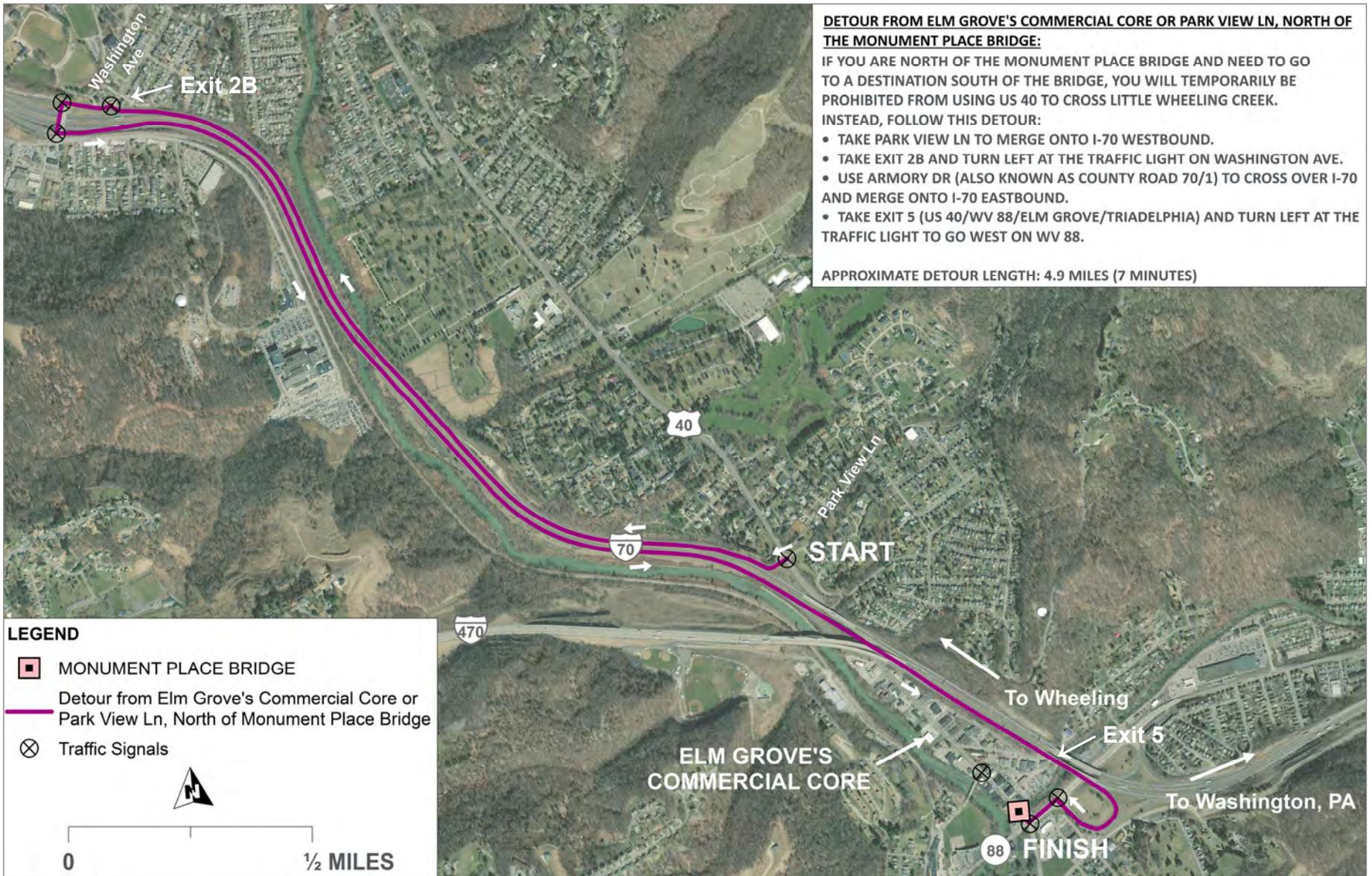
Environmental Resource Category	Preferred Alternative and Secondary Impacts
Energy	Minor impacts
Air Quality	Temporary impact as a result of increased pollutants during construction
Noise	Temporary impacts during construction.
Traffic Capacity	Temporary impacts during construction due to closure of existing bridge.
Secondary Impacts* – Built Environment	<ul style="list-style-type: none"> <li>Better access for vehicles and pedestrians to cross Little Wheeling Creek and access to schools, cemeteries, and other community facilities</li> <li>The project will maintain north-to-south connectivity along US 40, thereby improving community cohesion in the Elm Grove, Wheeling, and Triadelphia communities.</li> </ul>
Secondary Impacts* – Natural Environment	<p>Minimal long-term water quality impacts associated with runoff:</p> <ul style="list-style-type: none"> <li>Re-suspended riverbed sediment deposition on fish spawning areas, floodplains, and streams</li> <li>Runoff from the bridge deck and potential for spills of hazardous materials during transportation</li> </ul> <p>WVDOH will implement Best Management Practices to filter surface runoff and control spills and will develop erosion control plans, which the contractor will be required to use and follow.</p> <p>WVDOH will apply for and obtain any necessary permits from the appropriate regulatory agencies.</p>
Environmental Justice Residential/Business Displacements Bicycle Facilities Community Cohesion Land Use Archaeological Resources Wild and Scenic Rivers Natural and Wild Areas Prime and Unique Farmland Geologic Resources Groundwater Waste Sites	No impacts
Cost Estimate    \$5,795,000	

\* Secondary impacts are reasonably foreseeable impacts that could occur in the future or at a distance from the proposed project (40 CFR § 1508.8).  
Secondary impacts include induced growth and related environmental impacts, such as changes to land use patterns, population density or growth rates, and related impacts on air quality, water, and other natural systems.





# TRAFFIC DETOUR FROM ELM GROVE'S COMMERCIAL CORE OR PARK VIEW LN, NORTH OF BRIDGE



# Regulatory Agency Comments

## Merchan Paniagua, Sara

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**Subject:** FW: Monument Place Bridge Environmental Assessment

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**From:** Mullins, Sondra L [<mailto:Sondra.L.Mullins@wv.gov>]

**Sent:** Monday, April 15, 2019 3:22 PM

**To:** Staud, Amy <[Amy.Staud@hdrinc.com](mailto:Amy.Staud@hdrinc.com)>; Henson, Deborah <[Deborah.Henson@hdrinc.com](mailto:Deborah.Henson@hdrinc.com)>; Boehm, Scott <[Scott.Boehm@hdrinc.com](mailto:Scott.Boehm@hdrinc.com)>

**Cc:** Cummings, Traci L <[Traci.L.Cummings@wv.gov](mailto:Traci.L.Cummings@wv.gov)>; Hark, Ben L <[Ben.L.Hark@wv.gov](mailto:Ben.L.Hark@wv.gov)>

**Subject:** Fw: Monument Place Bridge Environmental Assessment

Below are the comments from the EPA on the Monument Place EA.

---

**From:** Okorn (Root), Barbara <[Okorn.Barbara@epa.gov](mailto:Okorn.Barbara@epa.gov)>

**Sent:** Monday, April 15, 2019 2:33:04 PM

**To:** Workman, Jason (FHWA); Mullins, Sondra L

**Subject:** Monument Place Bridge Environmental Assessment

Jason and Sondra ,

Thank you for the opportunity to review the Environmental Assessment (EA) for the Monument Place Bridge project in Ohio County, West Virginia. FHWA is proposing to rehabilitate or replace the existing bridge over Little Wheeling Creek. We have reviewed the EA in accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508). Based on our review, we have the following comments:

- Page 3-10 states that “The channel morphology displays low sinuosity and appears relatively stable because of development and impacts to the stream.” It is unclear how the stream could be stable because of impacts. Please clarify.
- Page 3-31 mitigation for impacts to streams- we suggest in addition to the silt fencing BMPs, construction equipment storage, refueling, etc. not be conducted in the floodplain.
- Page 3-31- Section 3.3.3 Wetlands- in addition to reviewing NWI maps, aquatic resources in the project areas should be field surveyed. NWI maps are not always accurate.
- This section also says that temporary impacts may occur with maintenance of the bridge. How would these impacts be temporary? It seems maintenance could be a regular activity. Please explain.
- We suggest the project team follow the guidance of WVDNR and USFWS on the freshwater mussel surveys . We also suggest the area within the footprint of the bridge and downstream to the mouth of Little Wheeling Creek plus the receiving stream (Wheeling Creek) be surveyed. If mussels are found within the foot print of the bridge construction they should be relocated. While WVDNR conducted 3 surveys from Little Wheeling Creek that have not found mussels, there is potential for the following species to be within Little Wheeling Creek...

*Fusconaia flava*

*Lampsilis cardium*  
*Lampsilis fasciola*  
*Lampsilis siliquoidea*  
*Lasmigona complanata*  
*Lasmigona costata*  
*Leptodea fragilis*  
*Potamilus alatus*  
*Ptychobranthus fasciolaris*  
*Pyganodon grandis*  
*Strophitus undulatus*  
*Villosa iris*

- Section 3.3.4-The language describing Little Wheeling Creek is unclear . We suggest removing the statement that Little Wheeling Creek is not supporting a warm water fishery since the other statement says WVDEP doesn’ to have sufficient data to make the determination. “The *2014 West Virginia Integrated Water Quality Monitoring and Assessment Report* lists Wheeling Creek and Little Wheeling Creek as impaired for one or more uses and has a Total Maximum Daily Load (TMDL) (WVDEP 2014a). Wheeling Creek is not supporting of public water supply or water contact recreation, but is fully supporting of agriculture and wildlife and water supply for industrial purposes. **WVDEP does not have sufficient data to determine whether Wheeling Creek is supporting of warm water fishery (WVDEP 2014b).** Wheeling Creek is listed with a developed TMDL for fecal coliform in 2009. **Little Wheeling Creek is not supporting of warm water fishery**, public water supply, or water contact recreation, but is fully supporting of agriculture and wildlife and water supply for industrial purposes (WVDEP 2014b). Little Wheeling Creek is listed with a developed 2009 TMDL for iron and a 2010 TMDL for fecal coliform.”
- The EA should evaluate type and quantity of herbicide that may be used and evaluate it for adverse effects on mussels, fish and benthic macroinvertebrates.
- We suggest the project team closely coordinate with the public on design and construction impacts as the project moves forward.

We would be pleased to discuss our comments at your convenience. In addition, WVDNR and EPA have been working on a project using eDNA of freshwater mussels to provide additional presence/absence data of streams for freshwater mussels. There is a general mussel eDNA probe that we would recommend to WVDOH for it’s use on being able to detect 80 species of freshwater mussel potentially in Little Wheeling Creek along with the use of the survey data. With some coordination samples could be taken and analyzed during 2019 field season. Please let me know if you are interested. Also, please note the change in my mail code and office title below.

Thank you,  
Barb

Barbara Okorn  
Office of Communities, Tribes, & Environmental Assessment  
US EPA, Region III

1650 Arch Street (3RA10)  
Philadelphia, PA 19103  
215-814-3330



April 19, 2019

**The Culture Center**  
1900 Kanawha Blvd., E.  
Charleston, WV 25305-0300

**Randall Reid-Smith, Commissioner**

Phone 304.558.0220 • www.wvculture.org  
Fax 304.558.2779 • TDD 304.558.3562

EEO/AA Employer

Mr. Ben L. Hark  
Environmental Section Head  
Engineering Division  
West Virginia Division of Highways  
1334 Smith Street  
Charleston, West Virginia 25305

RE: Elm Grove (Monument Place) Bridge Rehabilitation Project  
Elm Grove, Ohio County, West Virginia  
Federal Project No. BR-0040(049)E  
State Project No. S335-40-6.65  
FR: 16-684-OH-9

Dear Mr. Hark:

We received a copy of the Environmental Assessment (EA) prepared for the aforementioned undertaking. As required by Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties," we submit our comments.

We have reviewed the EA and concur with the findings described therein. As you know, we have signed a Memorandum of Agreement prepared for the project. Once all parties have signed the MOA, please forward a copy to our office to be added to our files. We will provide further comments upon receipt of the documentation and information described within the MOA stipulations.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact Mitchell K. Schaefer, Structural Historian, at (304) 558-0240.*

Sincerely,

Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/MKS

# Public Comments



Monument Place Bridge Public Meeting

DATE: 3/19/19

Mr. RJ Scites, P.E.  
Director, Engineering Division  
West Virginia Division of Highways  
1334 Smith Street  
Charleston, West Virginia 25301

DATE: Tuesday, March 19, 2019  
LOCATION: Independence Hall, 1528 Market Street, Wheeling, WV  
SUBJECT: Public Meeting  
PROJECT: Monument Place Bridge Rehabilitation/Replacement  
S235-40-6.65 00  
Wheeling, WV  
Ohio County

COMMENTS DUE BY April 19, 2019

Please consider the following comments:

Running loop (6 + 8 miles) using Rt 40, Kruger St,  
and the Wheeling Heritage Trail. Kayak launch  
location as well.

NAME: Jesse Mestrovic

ADDRESS:

ORGANIZATION (IF ANY): City of Wheeling : Parks + Rec Director

How did you hear about the Public Meeting?

News

Project Information and Comment Sheets can be found online at our web page

<http://go.wv.gov/dotcomment>.



\_Title  
FirstName Edward  
LastName Schultz  
Organization  
Email  
MailingAddress  
City WHEELING  
State WV  
ZipCode 26003  
Comments  
Sir:  
1. Please look at resurface the Shilling Bridge as you can now see the steel mesh.  
2. Please come up with some way to limit traffic from using, heavy trucks, busses, the Lumber Ave ext. Shilling Bridge as a by pass. There will be a mess at intersection to Rt 40 area. Also this will make it hard to get out and in to Overbrook.  
Please look at the Jr Ave bridge area also to limit the use of heavy trucks, busses, as this area will be a mess at the bottom of the hill of Rt 88 to get around for people who live there.  
I know that you have not marked these streets as by pass, but we know that the traffic flow will increase on them by many times.  
Thank you for your time  
Edward Schultz  
CommentType Online

Created at 3/20/2019 8:58 AM by  
Last modified at 3/20/2019 8:58 AM by



Monument Place Bridge Public Meeting

DATE: 4/17/19

Mr. RJ Scites, P.E.  
Director, Engineering Division  
West Virginia Division of Highways  
1334 Smith Street  
Charleston, West Virginia 25301

RECEIVED  
APR '22 2019  
ENGINEERING  
DIVISION

DATE: Tuesday, March 19, 2019  
LOCATION: Independence Hall, 1528 Market Street, Wheeling, WV  
SUBJECT: Public Meeting  
PROJECT: Monument Place Bridge Rehabilitation/Replacement  
S235-40-6.65 00  
Wheeling, WV  
Ohio County

COMMENTS DUE BY April 19, 2019

Please consider the following comments:

As we all know, this is an extremely important bridge from a historic standpoint, so we would expect that all possible care would be taken to preserve it and maintain its historic character.

The shorter the closing of the bridge, the better.

NAME: Jeanne Finstein

ADDRESS: [Redacted]

ORGANIZATION (IF ANY): Friends of Wheeling

How did you hear about the Public Meeting?

direct mail to Friends of Wheeling

Project Information and Comment Sheets can be found online at our web page  
<http://go.wv.gov/dotcomment>.



# Community Survey Responses

**COMMUNITY SURVEY REGARDING PEDESTRIAN ACCESS DURING CONSTRUCTION**

Please answer the questions to help the team understand your concerns about the changes in pedestrian access in the Monument Place Bridge area during the construction phase. Thank you for your input.

1. Do you walk across the Monument Place Bridge?

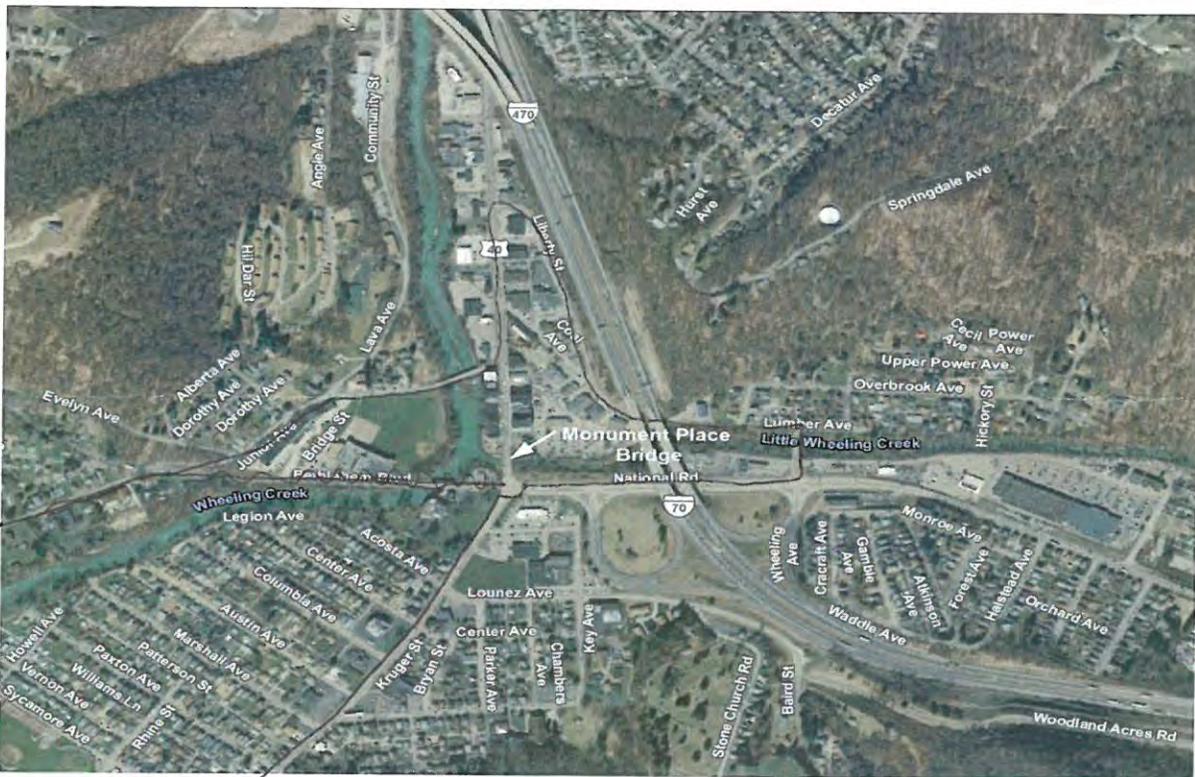
Yes  No

2. How many times do you use the bridge in a typical week? twice at least

3. What are the start and end points of your trip when you walk across the bridge? Please explain below or mark your route in the map.

Start of your trip: Elm terrace -> all around Grove

End of your trip: Elm terrace



4. What are the reasons you walk across the bridge (work, leisure, access to businesses, other)?

access to businesses, leisure

5. While the bridge is closed for construction, what alternate route would you use if walking?

Lumber Ave. Junior Ave. Shilling Bridge

6. Please share any other concerns you may have related to pedestrian access during construction.

extra traffic on Coal Ave when the Eagles patrons park on both sides. Surface condition of coal Ave, Hendrick, Lumber Ave & Shilling bridge.



### COMMUNITY SURVEY REGARDING PEDESTRIAN ACCESS DURING CONSTRUCTION

Please answer the questions to help the team understand your concerns about the changes in pedestrian access in the Monument Place Bridge area during the construction phase. Thank you for your input.

1. Do you walk across the Monument Place Bridge?

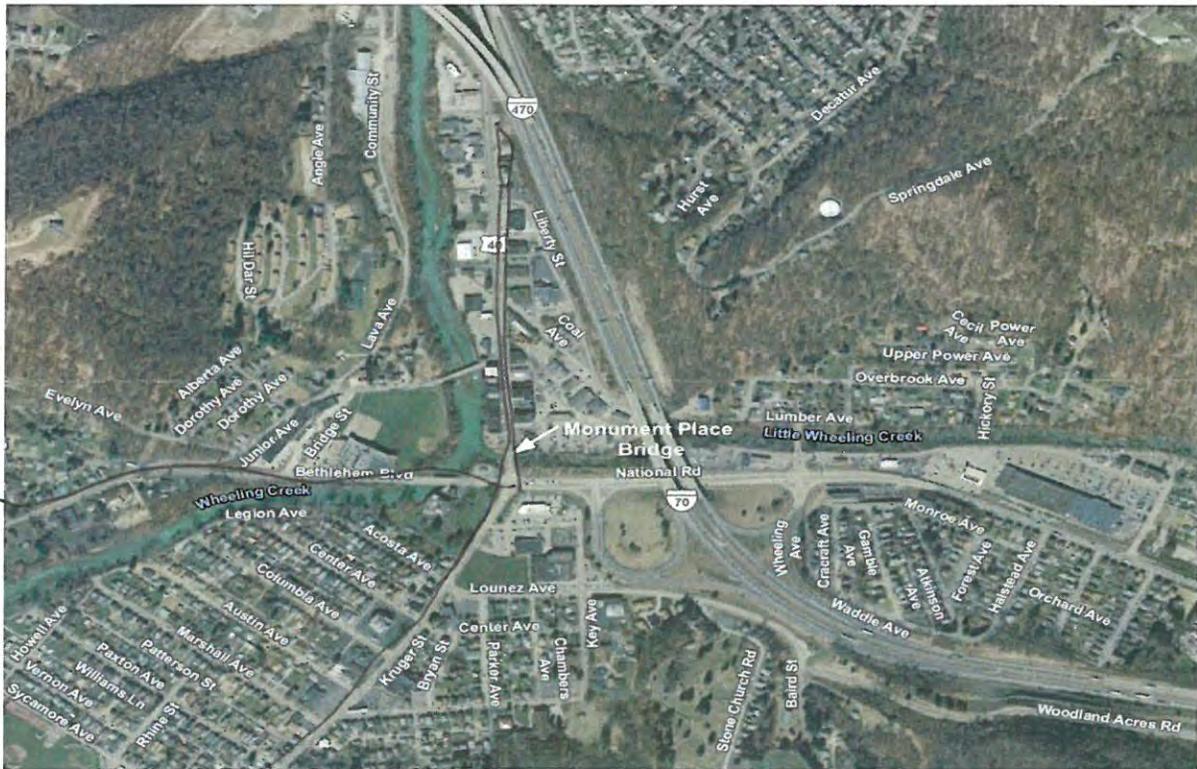
Yes  No

2. How many times do you use the bridge in a typical week? 10x

3. What are the start and end points of your trip when you walk across the bridge? Please explain below or mark your route in the map.

Start of your trip: \_\_\_\_\_

End of your trip: \_\_\_\_\_



4. What are the reasons you walk across the bridge (work, leisure, access to businesses, other)?

fitness

5. While the bridge is closed for construction, what alternate route would you use if walking?

I'll use the trail from Community St.

6. Please share any other concerns you may have related to pedestrian access during construction.

Safety mostly,



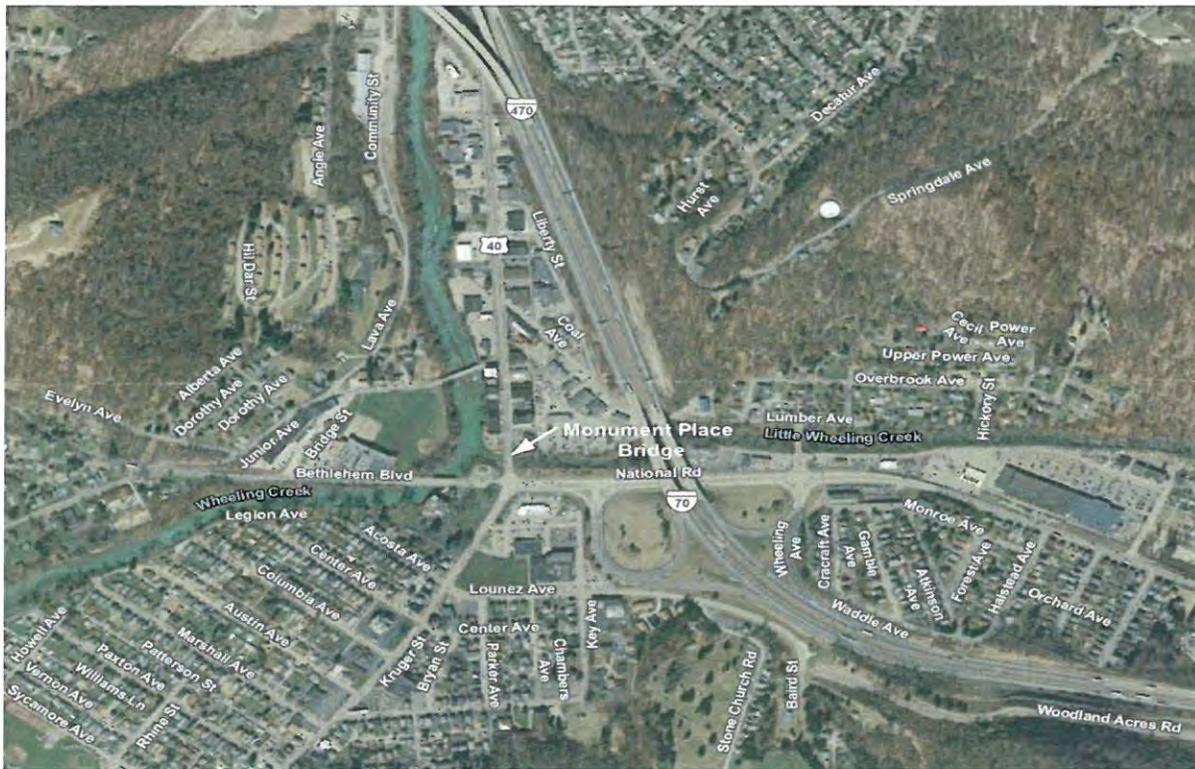
### COMMUNITY SURVEY REGARDING PEDESTRIAN ACCESS DURING CONSTRUCTION

Please answer the questions to help the team understand your concerns about the changes in pedestrian access in the Monument Place Bridge area during the construction phase. Thank you for your input.

1. Do you walk across the Monument Place Bridge?  
Yes  No
2. How many times do you use the bridge in a typical week? 3
3. What are the start and end points of your trip when you walk across the bridge? Please explain below or mark your route in the map.

Start of your trip: Washington Ave → Run Rt 40 + back trail

End of your trip: same



4. What are the reasons you walk across the bridge (work, leisure, access to businesses, other)?  
Fitness - part of my 6 + 8 mile jogging loop

5. While the bridge is closed for construction, what alternate route would you use if walking?  
Juniper Ave Bridge +/or Shilling Bridge

6. Please share any other concerns you may have related to pedestrian access during construction.  
At the city owned parking lot beside bridge is a popular water trail launch point and fishing spot.



### COMMUNITY SURVEY REGARDING PEDESTRIAN ACCESS DURING CONSTRUCTION

Please answer the questions to help the team understand your concerns about the changes in pedestrian access in the Monument Place Bridge area during the construction phase. Responses can be mailed to Mr. RJ Scites, P.E., Director, Engineering Division, West Virginia Division of Highways, 1334 Smith Street, Charleston, West Virginia 25301 by April 19, 2019. Thank you for your input.

1. Do you walk across the Monument Place Bridge?

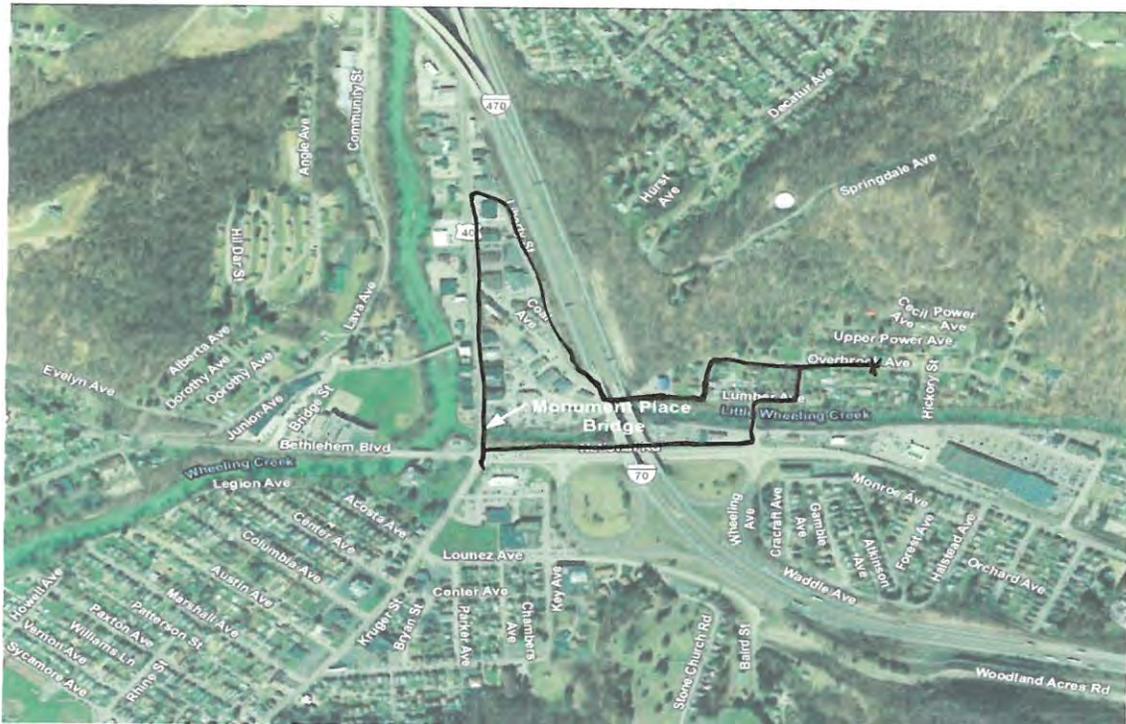
Yes X No \_\_\_\_\_

2. How many times do you use the bridge in a typical week? 8 times

3. What are the start and end points of your trip when you walk across the bridge? Please explain below or mark your route in the map.

Start of your trip: OVERBROOK AVE

End of your trip: OVERBROOK AVE



4. What are the reasons you walk across the bridge (work, leisure, access to businesses, other)?

LEISURE - HEALTH - BUSINESS IN ELM GROVE

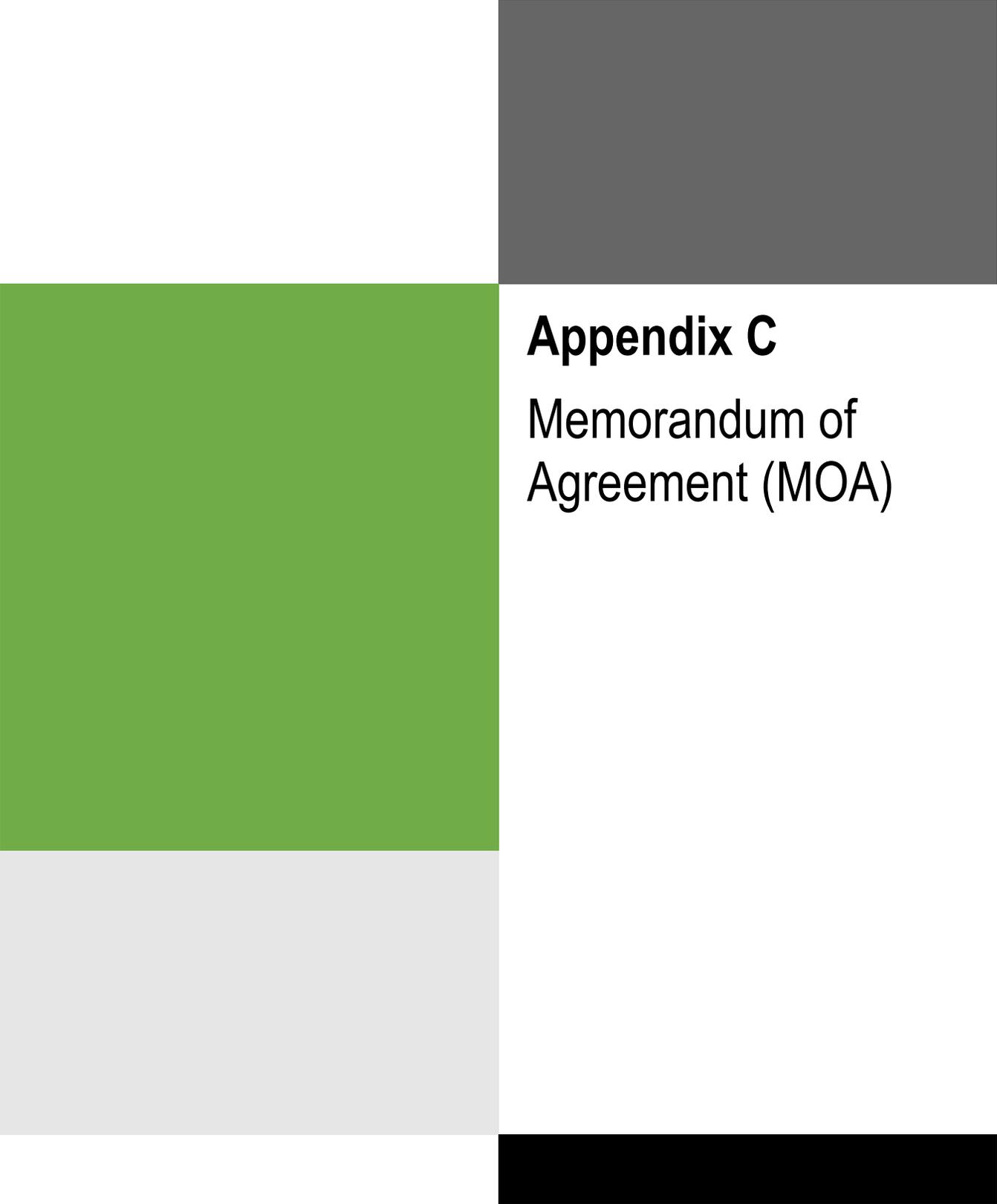
5. While the bridge is closed for construction, what alternate route would you use if walking?

NOT SURE YET

6. Please share any other concerns you may have related to pedestrian access during construction.

I would still like to walk + conduct business + ride my bike to trail during construction.





## **Appendix C**

### Memorandum of Agreement (MOA)

**MEMORANDUM OF AGREEMENT  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
THE WEST VIRGINIA STATE HISTORIC PRESERVATION OFFICER, THE WEST  
VIRGINIA DIVISION OF HIGHWAYS, AND  
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**

**REGARDING IMPLEMENTATION OF THE ELM GROVE (AKA MONUMENT PLACE)  
BRIDGE**

**STATE PROJECT #S335-40-6.65 00  
FEDERAL PROJECT #BR-0040(049)E  
OHIO COUNTY, WEST VIRGINIA  
JULY 2018**

**WHEREAS**, the Federal Highway Administration (FHWA), in cooperation with the West Virginia Division of Highways (WVDOH), proposes to rehabilitate the Elm Grove Monument Place) Bridge, which spans Wheeling Creek in Wheeling, Ohio County, West Virginia, hereinafter referred to as the Project. The improvements involve the rehabilitation of the existing bridge while detouring traffic on existing roads; and

**WHEREAS**, the FHWA has determined that the Project will have an adverse effect upon the Elm Grove (Monument Place) Bridge, a property on the National Register of Historic Places (NRHP); and

**WHEREAS**, the FHWA has consulted with the West Virginia State Historic Preservation Officer (WVSHPO) pursuant to 36 CFR Part 800 Implementing Section 106 of the National Historic Preservation Act; (54 U.S.C. § 306108); and

**WHEREAS**, the FHWA has consulted with Federally-recognized Indian tribes with ancestral lands in West Virginia in a manner consistent with WVDOT's Tribal Consultation Guidance; and

**WHEREAS**, the WVDOH has participated in the consultation and is an invited signatory to this Memorandum of Agreement (MOA); and

**WHEREAS**, the WVDOH has contacted the Preservation Alliance of West Virginia, Friends of Wheeling, National Road Alliance of West Virginia, Wheeling National Heritage Area, Wheeling Area Historical Society, Victorian Wheeling Landmarks Foundation, The Museum of Oglebay Institute, and the Wheeling Historic Landmarks Commission; and the Wheeling National Heritage Area responded to the letter with support of saving the historic structure; and

**WHEREAS**, in accordance with 36 CFR § 800.6 (a) (1), the FHWA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination providing the specified documentation, and the ACHP has chosen not to

participate in the consultation pursuant to 36 CFR § 800.6 (a) (1) (iii) and is a signatory to the MOA;

**NOW, THEREFORE**, the FHWA, the WVSHPO, and the WVDOH agree that the undertaking will be implemented in accordance with the following stipulations in order to take into account the effects of the undertaking on historic properties.

### STIPULATIONS

The FHWA with the assistance of WVDOH shall ensure that the following stipulations are carried out:

#### **Elm Grove (Monument Place) Bridge**

- I. The Elm Grove (Monument Place) Bridge will be documented in its present historic setting. The documentation package will include a brief history of the structure, current and historical 5" x 7" black and white digital prints in accordance with the National Register of Historic Places and National Historic Landmarks Survey Photo Policy Expansion of January 2009. The documentation package will include hard archival copies of the information outlined in this stipulation as well as digital copies in the form of PDFs for reports and documents, and TIFF files for photographs. The WVSHPO will be given the opportunity to review the documents before submission of final versions. All final documents will be distributed to the City of Wheeling and the Ohio County Library.
- II. The WVDOH in cooperation with the WVSHPO has worked to minimize the effects to the historic structure. Several renderings of the balustrade and scour protections were evaluated to reduce the visual effects on the bridge. The WVDOH will provide to the WVSHPO and the public an opportunity to review and comment on the design of the new bridge.
- III. The WVDOH will install a historic marker explaining the history of the bridge along with the details of the renovation project. The marker will be located in the proximity of the bridge. The WVSHPO will be given the opportunity to review the marker prior to fabrication.
- IV. 500 color brochures of the Elm Grove (Monument Place) Bridge will be developed by the WVDOH and distributed to the City of Wheeling and the Ohio County Public Library. The WVSHPO will be given the opportunity to review all educational materials developed for this stipulation. A CD containing the brochure will also be given the City and Library to print brochures when the original total has been exhausted.
- V. The Elm Grove (Monument Place) Bridge will be documented on the West Virginia historic bridge website: Highways Through History (<http://www.highwaysthroughhistory.com>).

#### **VI. Duration**

This MOA will expire if its stipulations are not carried out within five (5) years from the date of its execution. At such time, and prior to work continuing on the undertaking, the FHWA shall either (a) execute an MOA pursuant to 36 CFR § 800.6, or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. Prior to such time, FHWA may consult with other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation XI below. FHWA shall notify the signatories as to the course of action it will pursue.

#### **VII. Post-Review Discoveries**

If any unanticipated discoveries of historic properties or archaeological sites, including human burial sites and/or skeletal remains, are encountered during the implementation of this undertaking, work shall be suspended in the area of the discovery until the WVDOH has developed and implemented an appropriate treatment plan in consultation with the WVSHPO pursuant to 36 CFR § 800.13(b).

#### **VIII. Monitoring and Reporting**

Each year following the execution of this MOA until it expires or is terminated, FHWA shall provide all parties to this MOA a summary report detailing work carried out pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in FHWA's efforts to carry out the terms of this MOA.

#### **IX. Dispute Resolution**

Should any signatory or concurring party to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, FHWA shall consult with such party to resolve the objection. If FHWA determines that such objection cannot be resolved, FHWA will:

- A. Forward all documentation relevant to the dispute, including the FHWA's proposed resolution, to the ACHP. The ACHP shall provide FHWA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FHWA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. FHWA will then proceed according to its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, FHWA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FHWA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and provide them and the ACHP with a copy of such written response.

C. FHWA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

**X. Amendments**

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

**XI. Termination**

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Stipulation X, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing on the undertaking, FHWA must either (a) execute a MOA pursuant to 36 CFR § 800.6, or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. FHWA shall notify the signatories as to the course of action it will pursue.

**EXECUTION** of the Memorandum of Agreement by the FHWA, WVSHPO, and the WVDOH and the Council, and implementation of its terms evidence that the FHWA has afforded the Council an opportunity to comment on the Elm Grove (Monument Place) Bridge and its effects on historic properties, and that the FHWA has taken into account the effects of the undertaking on the historic properties.

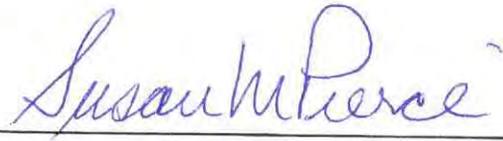
**Signatories:**

  
\_\_\_\_\_

Federal Highway Administration

6-14-19

Date

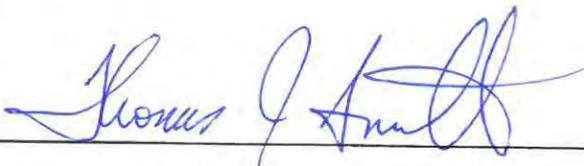
  
\_\_\_\_\_

West Virginia Deputy State Historic Preservation Officer

7/30/18

Date

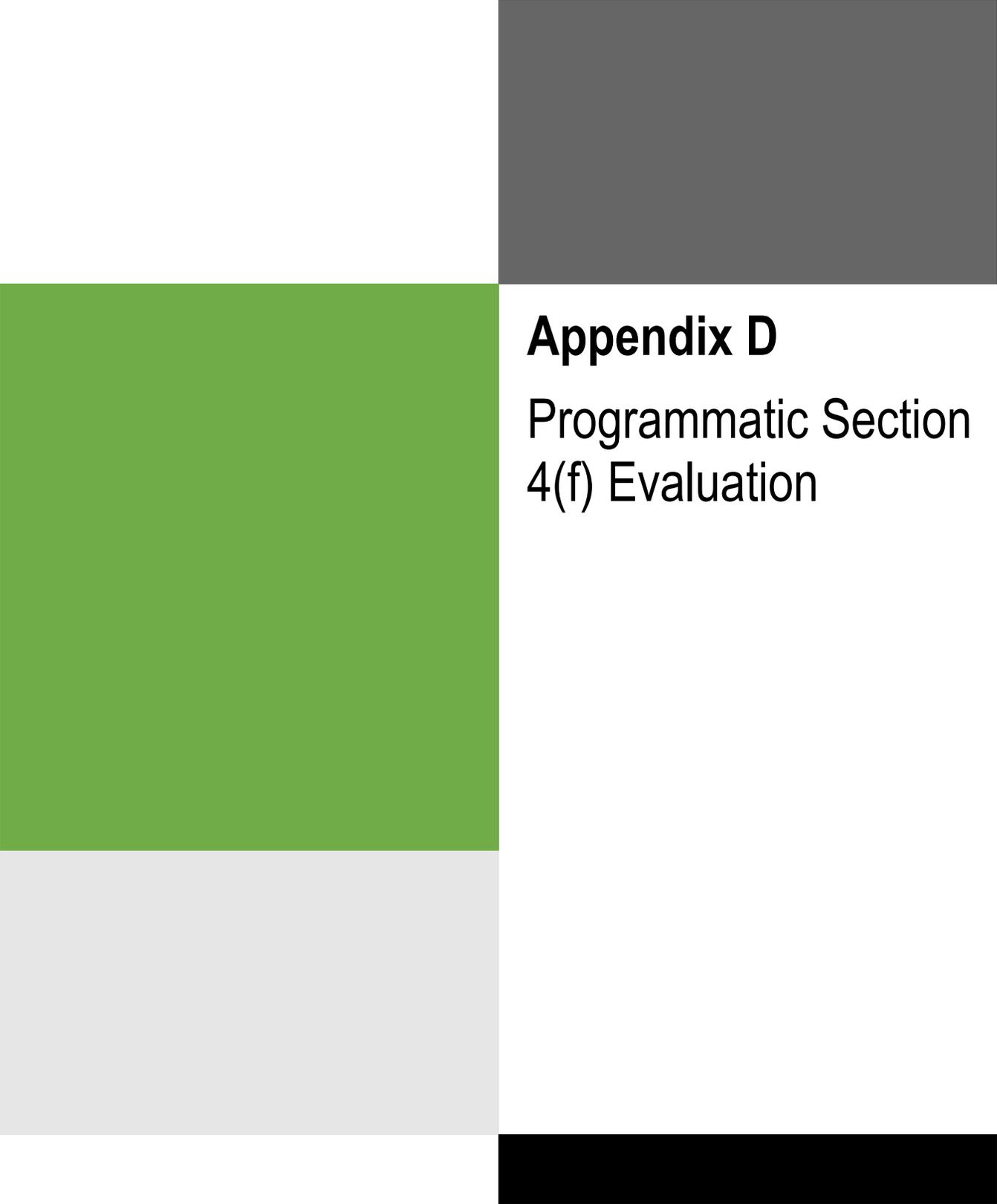
**Invited Signatories:**

  
\_\_\_\_\_

West Virginia Division of Highways

8/8/18

Date



## **Appendix D**

### Programmatic Section 4(f) Evaluation

This document demonstrates compliance with the Federal Highway Administration’s (FHWA) *Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges* which was issued on July 5, 1983. The Project at issue is the rehabilitation of Monument Place Bridge for vehicles and pedestrians. The Project is located in the unincorporated community of Elm Grove, Wheeling, West Virginia. The bridge carries US 40, National Road, traffic over Little Wheeling Creek. The Project Study Area is illustrated in Figure 1.

**Figure 1: Project Study Area**



**Project Purpose and Needs**

In order to ensure that US 40 continues to convey vehicular and pedestrian traffic through the unincorporated community of Elm Grove, remains safe for pedestrian and vehicular travel, and maintains the continuity of the local transportation system, the Monument Place Bridge will either need to be rehabilitated or replaced. The need for this project arises from the fact that the stone arch bridge is exhibiting signs of deterioration resulting in weight limits that will decrease as the structure continues to deteriorate.

From 1958 to 2014, the exterior of the bridge was covered with a concrete veneer (gunite/shotcrete), giving it the appearance of a concrete arch bridge. Over time, portions of the veneer had fallen into Little Wheeling Creek, which exposed the limestone masonry underneath that had suffered a loss of mortar and stone deterioration. In 2015, WVDOH undertook the removal of the shotcrete to more fully evaluate the condition and structural capacity of the bridge. The veneer failed to prevent scour or erosion of the bridge supports below the level of the creek, and the scour undermined an abutment and two bridge piers. The sidewalk overhangs and support brackets showed extensive deterioration that is notable below the construction joints supporting the sidewalks. Currently, the bridge is posted for weight limit restrictions of 16 tons for single unit trucks and 32 tons for tractor trailers.

### **Identification of the Section 4(f) Property**

Monument Place Bridge is illustrated in the photo below (as of 2016, after removal of shotcrete).



In 1806, President Thomas Jefferson authorized the construction of the Cumberland Road (later becoming National Road) with the intention of establishing a land route linking the Potomac and Ohio Rivers. In 1811, construction of the National Road began, linking Cumberland, Maryland, to Wheeling, West Virginia, with bridge construction occurring in 1817 and road completion occurring in 1818. The completion of the National Road spurred a regional economic boom and helped Wheeling become the gateway to the West as hundreds of wagons carried goods over the road annually. The new linkage between the Potomac and Ohio Rivers reduced travel time and greatly reduced shipping costs.

The Monument Place Bridge is the oldest bridge in West Virginia, is among the oldest bridges in the country, and is one of only two (along with the Wheeling Suspension Bridge) extant bridges in West Virginia from the historic National Road facility. The stone arch bridge is a unique and rare example of a stone arch that features the elliptical style of arch geometry. The three span structure was updated in 1931 when the original parapets were removed and replaced with concrete sidewalks and balustraded parapets. Monument Place Bridge was placed on the National Register of Historic Places in 1981.

### **Applicability**

The West Virginia Department of Transportation Division of Highways (WVDOH) has prepared an Environmental Assessment for the Monument Place Bridge project. This programmatic Section 4(f) evaluation may be applied by the FHWA to projects which meet the following criteria:

1. *The bridge is to be replaced or rehabilitated with Federal funds.*

Monument Place Bridge will be rehabilitated with Federal funds.

2. *The project will require the use of a historic bridge structure which is on or is eligible for listing on the National Register of Historic Places.*

Monument Place Bridge was placed on the National Register of Historic Places in 1981. The rehabilitation of the bridge was determined to result in an Adverse Effect on the historic bridge in accordance with the criteria of effect in Section 106 of the National Historic Preservation Act. The finding of an Adverse Effect results in a “use” under Section 4(f).

3. *The bridge is not a National Historic Landmark.*

Monument Place Bridge is not a National Historic Landmark.

4. *The FHWA Division Administrator determines that the facts of the project match those set forth in the sections of this document labeled Alternatives, Findings, and Mitigation.*

FHWA has approved this document.

5. *Agreement among the FHWA, the State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP) has been reached through procedures pursuant to Section 106 of the NHPA.*

A Memorandum of Agreement (MOA) pursuant to Section 106 of the National Historic Preservation Act is included in Appendix A.

### **Alternatives Considered/Findings**

In accordance with the Programmatic Section 4(f) Evaluation for the Use of Historic Bridges, the required findings for each alternative that was considered are discussed.

1. *Do nothing.*

The Do nothing or No-Build Alternative proposes no rehabilitation or replacement of the existing structure. WVDOH would continue to provide maintenance on the structure as currently is done today.

The structure is already structurally deficient and is posted for weight restrictions. As deterioration of the structure continues, additional weight restrictions may be imposed, and eventually the structure may need to be closed to all traffic (vehicular and pedestrian) as individual or groups of the main arch stones will become unstable, or scour will threaten the arches where they are supported within the limits of the creek. The sidewalks also have significant deterioration and will eventually need to be closed to pedestrian traffic, unless major repairs or modifications were performed. The maintenance costs (and costs of mandatory repairs) would significantly increase over time as the structure continues to deteriorate, and initial cost savings from not rehabilitating or replacing the structure will quickly erode. For these reasons, the Do Nothing Alternative does not meet the project purpose and need.

WVDOH completed an Alternatives Evaluation Report in 2016 which considered Factors of Safety for the existing bridge. A factor of safety of 1.0 indicates that there is no reserve capacity, and below 1.0, the anticipated loads will exceed the calculated capacity. While the current factors of safety are adequate (1.6 with a conservative assumed deterioration), it is likely that the deterioration will continue at an increasing rate, which will tend to lower the factor of safety even more. Further, the sidewalk overhangs and associated brackets are severely deteriorated and rotating outwards, and must constantly be repaired. Access for ambulances and firefighting equipment to serve the Elm Grove area must also be maintained. Emergency response times will increase if the bridge over Little Wheeling Creek continues to deteriorate, as emergency vehicles may be weight restricted and will need to find alternate routes to Elm Grove.

**Finding:** Because of these deficiencies the bridge poses serious and unacceptable safety concerns for the traveling public or places intolerable restriction on transport and travel. The Do Nothing Alternative would not accomplish the purpose and need, and is therefore not feasible and prudent.

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.*

Two alternatives were considered at new locations – one upstream and one downstream of the existing bridge. The build alternative locations are illustrated in Figure 2.

**Figure 2: Alternatives Considered**



The upstream alternative (referred to in the EA as “Alternative 4”) would consist of replacing the existing Monument Place Bridge by constructing a new bridge on a new alignment approximately 833 feet upstream of the existing structure. The new bridge would be built between the dual structures carrying I-70 over US 40 and Little Wheeling Creek. This alternative also includes relocating US 40 along existing local streets, Lumber Avenue and Coal Avenue. This would require upgrading these local streets to meet the design criteria for an urban arterial facility. Currently, Lumber Avenue and Coal Avenue each have one lane in each direction.

This alternative includes two 12-foot lanes and two 4-foot shoulders on the bridge to accommodate curb and gutter, for a total width of 32 feet. Upgrading the local roads would require some permanent easements, but not full acquisitions.

The proposed structure would be designed to meet current vertical geometric design criteria, which would be an improvement over the existing structure; however, it would not be wide enough to accommodate necessary sidewalks or a left turn lane, requiring that Monument Place Bridge be left in place for pedestrian traffic. The overhead interstate highway structure at this location constrains the proposed bridge width. The existing Monument Place Bridge has a total width of 49 feet, 8 inches.

*Envision Wheeling*, the 2014 Comprehensive Plan for the City of Wheeling, identifies the area around the project as an opportunity area called “National Road-First Suburbs.” One of the planning priorities in the Comprehensive Plan is to maintain the commercial core along US 40 and in the neighborhood business areas. Alternative 4 would move traffic away from the commercial core. As a result of relocating US 40 away from the commercial core and closing the Monument Place Bridge to vehicular traffic, the existing businesses will remain on a street that does not cross Little Wheeling Creek and the connectivity within the commercial core would be compromised. Moving traffic away from the commercial core of Elm Grove would not be consistent with City of Wheeling’s Comprehensive Plan.

Alternative 4 would not meet the purpose and need because it would leave Monument Place Bridge in place for pedestrian traffic only, and would eventually need to close due to continued deterioration. In the near term, the sidewalks on the bridge would need to be removed. This would most likely result in a SHPO finding of adverse effect on the bridge and sidewalks (which are considered eligible for the National Register on their own), and therefore a use under Section 4(f). Eventually pedestrian traffic would not be able to be accommodated on the bridge due to continued structural deterioration.

Alternative 4 would not be prudent and feasible since it does not address the project purpose and need, diverts traffic from the central business district which is inconsistent with the Wheeling Comprehensive Plan, requires upgrading local streets from two to four lanes to relocate US 40, and would still require maintenance of the existing bridge for pedestrian traffic, which could not be continued indefinitely.

WVDOH studied a downstream alternative as well (referred to in the EA as “Alternative 5”). This alternative includes the replacement of the bridge on a new alignment 50 feet downstream of the existing structure. The new alignment would require the permanent

acquisition of approximately 10 businesses to realign US 40 and construct the new bridge structure. Acquisition of the businesses would not be in conformance with the City of Wheeling's Comprehensive Plan which aims to preserve the commercial core around US 40.

The new alignment would also create an offset and skewed intersection of US 40, WV 88, and Kruger Street, exacerbating the existing conditions of the currently skewed intersection of US 40, WV 88, and Kruger Street. Off-set intersections are undesirable because of their inefficient operation and potential safety concerns with drivers having to make multiple turns in quick succession.

With the construction of Alternative 5, pedestrian access could be provided on the new bridge. In this situation, the Monument Place Bridge would either be abandoned and would eventually have to be removed due to neglect, or it would have to be maintained. Maintenance of the bridge would be an extra cost in addition to the cost of constructing the new bridge and upgrading the existing roads. The deteriorated conditions of the existing bridge due to scour and the safety concerns of the low balustrade suggest that maintenance activities would likely still result in Adverse Effects to the historic integrity of the bridge.

Alternate 5 would meet the purpose and need, but it is not prudent and feasible due to the acquisition of businesses in the business district, which would be inconsistent with the Wheeling Comprehensive Plan, and creation of an offset intersection. In addition, Alternative 5 would likely still result in adverse effects to the historic bridge either through maintenance activities that would adversely affect its historic integrity or via neglect.

**Finding:** The build alternatives which involve construction of a new bridge upstream or downstream of the existing bridge are not prudent and feasible.

3. *Rehabilitate the historic bridge without affecting the historic integrity of the structure, as determined by procedures implementing the NHPA.*

Several alternatives were studied to rehabilitate the existing bridge (Alternatives 1, 2 and 3 in the EA). All of them involved the replacement of the existing balustraded parapets built in 1931. The West Virginia SHPO has determined that the rehabilitation proposed

by WVDOT would have an adverse effect on the historic features of Monument Place Bridge, specifically the balustrade parapets and the scour protection.

For purposes of this Section 4(f) evaluation, a rehabilitation alternative that would replace the balustraded parapets and scour protection in a way that would maintain the historic integrity of the bridge and enable the SHPO to agree that there would be no adverse effect on the bridge was developed and evaluated.

The Adverse Effect related to the proposed rehabilitation of Monument Place Bridge is the result of the decision to use a closed-window, taller balustrade on the outside edge of each sidewalk barrier, and the use of concrete scour protection for the piers and buttresses (see SHPO letter dated April 10, 2018 in Appendix A). The reasons why the design features requested by the SHPO (using open-window barrier, maintaining the existing balustrade height of 2 feet, 6 ¼ inches, and not using scour protection on the piers and buttresses) cannot be accommodated are as follows:

- Open-window barrier: In addition to the applied shotcrete and open deck joints, the openings in the existing current 1930's-era barriers have allowed salt water from snow plowing the surface of the bridge to run down the overhangs and stone spandrel walls, deteriorating the sandstone structure. The removal of the shotcrete and open deck joints as part of the roadway surface replacement will help mitigate the first two issues, and using closed-window barriers that will simulate the current silhouettes will eliminate the third cause of deterioration and protect the historic stone structure below. An open-window barrier is not prudent, since it will result in continued deterioration of the historic stone structure over time.
- Lower barrier height: The existing and future rehabilitated structure has sidewalks on either side with bicycle traffic. The current balustrade height of 2 feet, 6 -1/4 inches is substandard in terms of safety for bicycle traffic. Additionally, because the sidewalk curb is mountable, the barriers must provide adequate resistance for vehicular crash loads. The height and shape of the existing barriers is not adequate to provide this resistance. Taller barriers meeting current design criteria that are 3 feet, six inches high are needed for

safety purposes; therefore, replacing the balustrade at its existing height is not prudent.

- Scour protection: The SHPO found that the proposed scour protection, while necessary, would cumulatively alter the appearance of the piers and buttresses. The original structure had a widened stone base to protect the piers. Most of this stone is still in place but it is ineffective for preventing scour. Due to the characteristics of the channel flow, the piers exhibit measurable scour and undercutting below the piers. While the piers are currently safe to support the structure, continued scour will threaten the bearing capacity of the structure as well as permit continued deterioration and loss of the original masonry substructure. At various points in the last 50 to 100 years, rudimentary attempts have been made at concrete scour protection by maintenance forces. These incomplete concrete jackets are themselves deteriorating and undercut as well. To prevent further scour and detriment to the structure, proper concrete scour protection socketed into the bedrock must be provided with potential rip-rap as well. Without this protection, the bearing capacity may not be sufficient to support the continued use of the bridge, so the needs of the project would not be met.

**Finding:** Rehabilitating the bridge in a way that would not affect the historic integrity of the bridge is not prudent and feasible since the open barrier and lack of scour protection would leave the structure susceptible to concrete and stone deterioration and scour, and the lower balustrade height would not provide adequate resistance for vehicular crashes and would not meet design criteria for bicycle safety.

#### **Measures to Minimize Harm**

In coordination with the SHPO, measures to minimize harm to the bridge were discussed and a MOA was prepared and signed documenting the agreed upon measures to be implemented. (See Attachment A.)

#### **SUMMARY AND APPROVAL**

The project meets all of the applicability criteria set forth in this Programmatic Section 4(f) Evaluation issued on July 5, 1983. All alternatives set forth in the subject programmatic have been fully evaluated and the findings made are clearly applicable to

this project. There are no feasible and prudent alternatives to the use of the historic bridge.

The project includes all possible planning to minimize harm. FHWA will assure that the measures to minimize harm are incorporated into the project through its oversight of the federal-aid highway program. WVDOH will include the measures to minimize harm as environmental commitments in the applicable NEPA document for the project. WVDOH will also provide a copy of this evaluation to other parties upon request.

All supporting documentation is attached or referenced.

The project, and its use of the historic bridge, fall within and satisfy all of the criteria as set forth in the Department of Transportation, Federal Highway Administration – *Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges*, dated July 5, 1983.

Attachment A

Correspondence from WVSHPO finding of adverse effect  
and  
Memorandum of Agreement (MOA)



*The Culture Center*  
1900 Kanawha Blvd., E.  
Charleston, WV 25305-0300

**Randall Reid-Smith, Commissioner**

Phone 304.558.0220 • www.wvculture.org  
Fax 304.558.2779 • TDD 304.558.3562

EECVAA Employer

April 10, 2018

Mr. Ben L. Hark  
Environmental Section Head  
Engineering Division  
West Virginia Division of Highways  
1334 Smith Street  
Charleston, West Virginia 25305

RE: Elm Grove (Monument Place) Bridge Rehabilitation Project  
Elm Grove, Ohio County, West Virginia  
Federal Project No. BR-0040(049)E  
State Project No. S335-40-6.65  
FR: 16-684-OH-6

Dear Mr. Hark:

We have received your submission dated March 15, 2018, which provided additional information regarding the undertaking. As required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties," we submit our comments.

According to previously submitted information, the West Virginia Division of Highways (WV DOH) proposes to rehabilitate the Elm Grove Stone Arch Bridge (aka, Monument Place Bridge), which carries the National Road (HWY 40) over Wheeling Creek in Ohio County, West Virginia. Reports have indicated project plans will include the following components:

- Placing temporary false work in all arch barrels.
- Removing existing sidewalk, roadway, and structure fill.
- Repairing and replacing spandrel wall stones as necessary.
- Replacing fill with light-weight concrete and minimal reinforcement.
- Casting moment slab on top of structure including overhands for sidewalks.
- Casting concrete barriers with architectural treatment to match existing stone face.
- Extending and repairing shotcrete on underside of all arch barrels; spandrel wall stones will remain exposed.
- Removing and replacing existing concrete jackets around foundations to address current undercutting and prevent future occurrences.
- Placing scour protection in channel as needed.

Architectural & Bridge Resources:

In a letter dated September 29, 2017, we articulated our opinion that the proposed work would *adversely affect* the bridge. We noted our concerns with some of the proposed project elements, most notably the

April 10, 2018  
Mr. B. Hark  
FR: 16-684-OH-6  
Page 2

removal of the bridge's sidewalk, balustrade, and brackets. We also requested answers to a few questions, which your letter of November 15, 2017 provided. At our request, on January 11, 2018, representatives from our office, WVDOH, and HDR, met at the project bridge to discuss the undertaking. At the end of the site visit, we requested additional project information including renderings of the balustrade to show what it would look like with and without brackets and window openings in comparison to the existing balustrade. We also asked for renderings of the proposed scour protection.

On March 15, 2018, we received a letter of the same date that included copies of the requested renderings and project information. According to that letter you preferred Option C for the new balustrade design, which depicted closed windows and architectural brackets for the balustrade. You also preferred the circular jacket for scour protection around the piers and buttresses. Additionally, we understand much of the substructure's stonework will require in-kind replacement due to extensive sandstone spalling and deterioration.

After review of available project information, it remains our opinion the undertaking will impose an *adverse effect* on the Stone Arch Bridge. As noted in previous correspondence, the sidewalk, balustrade, and brackets "have acquired historic significance in their own right." According to *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, Rehabilitation Standard No. 4, those elements ought to be "retained and preserved." But over the last nine decades, the balustrade in particular has deteriorated to a point that now requires replacement. Under such circumstances, Rehabilitation Standard No. 6 states any new features should "match the old in design, color, texture and, where possible, materials." The closed-window balustrade will alter a distinctive design element of the existing bridge. However, we recognize the need for the preferred design to prevent salts and other contaminants from negatively affecting the substructure's stonework. HDR's March 12, 2018 report also indicated "the new barrier must be taller than the existing one..." And the existing/proposed scour protection, while necessary, will cumulatively alter the appearance of the piers and buttresses, thus diminishing a key example of craftsmanship that characterizes the property (see Rehabilitation Standard No. 5). As described, the proposed alterations will affect key elements of the historic bridge.

In accordance with 36 CFR §800.6(a) our offices have consulted to develop and evaluate alternatives to the undertaking to avoid or minimize its effects on the bridge. It is our understanding from the site visit and submitted information that the proposed work cannot be avoided lest the bridge continue to deteriorate and be rendered useless. For this reason, our offices have communicated on several occasions to evaluate project alternative plans. During the January 11, 2018 meeting at the bridge, representatives from both agencies discussed those alternatives at length with project consultants. Based on the available information and your reports to our office, it is our understanding that to achieve the project's goals the undertaking cannot be further minimized. Despite these efforts, the work will still pose an adverse effect on the bridge. Thus, the undertaking will require completion of a memorandum of agreement (MOA) per 36 CFR §800.6(b)(iv), or a programmatic agreement (PA) per 36 CFR §800.14(b). We recommend the following elements be included as stipulations within that documentation:

- Completion of photographic documentation and research, which would then be submitted to our

April 10, 2018  
Mr. B. Hark  
FR: 16-684-OH-6  
Page 3

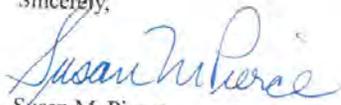
office, and identified local governments, libraries, or archives. This should include both historic and current photographs.

- Preparation and installation of interpretive signs to depict and explain the bridge's 200-year development. This could include illustrations explaining how the "new" bridge will be reinforced.
- Historic and contemporary photographs be added to the bridge's respective page on the *Highways Through History* website.
- The MOA or PA could include a stipulation addressing efforts to minimize the effects of the undertaking (balustrade designs, efforts to reduce visual effects of scour protection, etc.)

As you know, per 36 CFR 800.6(a), it is also your office's responsibility to notify the Advisory Council on Historic Preservation (ACHP) of our assessment of *adverse effect*. We will provide additional comments upon receipt of a draft MOA or PA.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact Mitchell K. Schaefer, Structural Historian, at (304) 558-0240.*

Sincerely,



Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/MKS



WEST VIRGINIA DEPARTMENT OF TRANSPORTATION

**Division of Highways**

1900 Kanawha Boulevard East • Building Five • Room 110  
Charleston, West Virginia 25305-0430 • (304) 558-3505

Thomas J. Smith, P. E.  
Secretary of Transportation/  
Commissioner of Highways

August 6, 2018

MEMORANDUM

TO: *[Handwritten initials]*  
THRU: *SSB* DD, HD and CH *SSB*  
FROM: DDE *BH* *for* *for*



SUBJECT: State Project S335-40-6.65 00  
Federal Project BR-0040(049)E  
Elm Grove Bridge (AKA Monument Place Bridge)  
Ohio County

Attached for your signature and approval is a Memorandum of Agreement to mitigate the adverse effect to subject historic bridge.

Should you have any questions, please contact Mrs. Sondra Mullins at email [Sondra.L.Mullins@wv.gov](mailto:Sondra.L.Mullins@wv.gov) or phone 6-9487.

BH:s

Attachment



RECEIVED  
AUG 02 2018  
ENGINEERING  
DIVISION

*The Culture Center*  
1900 Kanawha Blvd., E.  
Charleston, WV 25305-0300

**Randall Reid-Smith, Commissioner**

Phone 304.558.0220 • www.wvculture.org  
Fax 304.558.2779 • TDD 304.558.3562  
EEQ/AA Employer

July 31, 2018

Mr. Ben L. Hark  
Environmental Section Head  
Engineering Division  
West Virginia Division of Highways  
1334 Smith Street  
Charleston, West Virginia 25305

RE: Elm Grove (Monument Place) Bridge Rehabilitation Project  
Elm Grove, Ohio County, West Virginia  
Federal Project No. BR-0040(049)E  
State Project No. S335-40-6.65  
FR: 16-684-OH-8

Dear Mr. Hark:

We have received the *draft* Memorandum of Agreement (MOA) submitted for the aforementioned project. As required by Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties," we submit our comments.

We have reviewed the MOA and are amenable to the proposed stipulations. We are enclosing a signed copy with this letter. Once all parties have signed the MOA, please forward a copy to our office to be added to our files. We will provide further comments upon receipt of the documentation and information described within the stipulations.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact Mitchell K. Schaefer, Structural Historian, at (304) 558-0240.*

Sincerely,

Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/MKS

Enclosure (1): MOA

**MEMORANDUM OF AGREEMENT  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
THE WEST VIRGINIA STATE HISTORIC PRESERVATION OFFICER, THE WEST  
VIRGINIA DIVISION OF HIGHWAYS, AND  
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**

**REGARDING IMPLEMENTATION OF THE ELM GROVE (AKA MONUMENT PLACE)  
BRIDGE**

**STATE PROJECT #S335-40-6.65 00  
FEDERAL PROJECT #BR-0040(049)E  
OHIO COUNTY, WEST VIRGINIA  
JULY 2018**

**WHEREAS**, the Federal Highway Administration (FHWA), in cooperation with the West Virginia Division of Highways (WVDOH), proposes to rehabilitate the Elm Grove Monument Place) Bridge, which spans Wheeling Creek in Wheeling, Ohio County, West Virginia, hereinafter referred to as the Project. The improvements involve the rehabilitation of the existing bridge while detouring traffic on existing roads; and

**WHEREAS**, the FHWA has determined that the Project will have an adverse effect upon the Elm Grove (Monument Place) Bridge, a property on the National Register of Historic Places (NRHP); and

**WHEREAS**, the FHWA has consulted with the West Virginia State Historic Preservation Officer (WVSHPO) pursuant to 36 CFR Part 800 Implementing Section 106 of the National Historic Preservation Act; (54 U.S.C. § 306108); and

**WHEREAS**, the FHWA has consulted with Federally-recognized Indian tribes with ancestral lands in West Virginia in a manner consistent with WVDOT's Tribal Consultation Guidance; and

**WHEREAS**, the WVDOH has participated in the consultation and is an invited signatory to this Memorandum of Agreement (MOA); and

**WHEREAS**, the WVDOH has contacted the Preservation Alliance of West Virginia, Friends of Wheeling, National Road Alliance of West Virginia, Wheeling National Heritage Area, Wheeling Area Historical Society, Victorian Wheeling Landmarks Foundation, The Museum of Oglebay Institute, and the Wheeling Historic Landmarks Commission; and the Wheeling National Heritage Area responded to the letter with support of saving the historic structure; and

**WHEREAS**, in accordance with 36 CFR § 800.6 (a) (1), the FHWA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination providing the specified documentation, and the ACHP has chosen not to

participate in the consultation pursuant to 36 CFR § 800.6 (a) (1) (iii) and is a signatory to the MOA;

**NOW, THEREFORE**, the FHWA, the WVSHPO, and the WVDOH agree that the undertaking will be implemented in accordance with the following stipulations in order to take into account the effects of the undertaking on historic properties.

### STIPULATIONS

The FHWA with the assistance of WVDOH shall ensure that the following stipulations are carried out:

#### **Elm Grove (Monument Place) Bridge**

- I. The Elm Grove (Monument Place) Bridge will be documented in its present historic setting. The documentation package will include a brief history of the structure, current and historical 5" x 7" black and white digital prints in accordance with the National Register of Historic Places and National Historic Landmarks Survey Photo Policy Expansion of January 2009. The documentation package will include hard archival copies of the information outlined in this stipulation as well as digital copies in the form of PDFs for reports and documents, and TIFF files for photographs. The WVSHPO will be given the opportunity to review the documents before submission of final versions. All final documents will be distributed to the City of Wheeling and the Ohio County Library.
- II. The WVDOH in cooperation with the WVSHPO has worked to minimize the effects to the historic structure. Several renderings of the balustrade and scour protections were evaluated to reduce the visual effects on the bridge. The WVDOH will provide to the WVSHPO and the public an opportunity to review and comment on the design of the new bridge.
- III. The WVDOH will install a historic marker explaining the history of the bridge along with the details of the renovation project. The marker will be located in the proximity of the bridge. The WVSHPO will be given the opportunity to review the marker prior to fabrication.
- IV. 500 color brochures of the Elm Grove (Monument Place) Bridge will be developed by the WVDOH and distributed to the City of Wheeling and the Ohio County Public Library. The WVSHPO will be given the opportunity to review all educational materials developed for this stipulation. A CD containing the brochure will also be given the City and Library to print brochures when the original total has been exhausted.
- V. The Elm Grove (Monument Place) Bridge will be documented on the West Virginia historic bridge website: Highways Through History (<http://www.highwaysthroughhistory.com>).

#### **VI. Duration**

This MOA will expire if its stipulations are not carried out within five (5) years from the date of its execution. At such time, and prior to work continuing on the undertaking, the FHWA shall either (a) execute an MOA pursuant to 36 CFR § 800.6, or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. Prior to such time, FHWA may consult with other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation XI below. FHWA shall notify the signatories as to the course of action it will pursue.

#### **VII. Post-Review Discoveries**

If any unanticipated discoveries of historic properties or archaeological sites, including human burial sites and/or skeletal remains, are encountered during the implementation of this undertaking, work shall be suspended in the area of the discovery until the WVDOH has developed and implemented an appropriate treatment plan in consultation with the WVSHPO pursuant to 36 CFR § 800.13(b).

#### **VIII. Monitoring and Reporting**

Each year following the execution of this MOA until it expires or is terminated, FHWA shall provide all parties to this MOA a summary report detailing work carried out pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in FHWA's efforts to carry out the terms of this MOA.

#### **IX. Dispute Resolution**

Should any signatory or concurring party to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, FHWA shall consult with such party to resolve the objection. If FHWA determines that such objection cannot be resolved, FHWA will:

- A. Forward all documentation relevant to the dispute, including the FHWA's proposed resolution, to the ACHP. The ACHP shall provide FHWA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FHWA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. FHWA will then proceed according to its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, FHWA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FHWA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and provide them and the ACHP with a copy of such written response.

C. FHWA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

**X. Amendments**

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

**XI. Termination**

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Stipulation X, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing on the undertaking, FHWA must either (a) execute a MOA pursuant to 36 CFR § 800.6, or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. FHWA shall notify the signatories as to the course of action it will pursue.

**EXECUTION** of the Memorandum of Agreement by the FHWA, WVSHPO, and the WVDOH and the Council, and implementation of its terms evidence that the FHWA has afforded the Council an opportunity to comment on the Elm Grove (Monument Place) Bridge and its effects on historic properties, and that the FHWA has taken into account the effects of the undertaking on the historic properties.

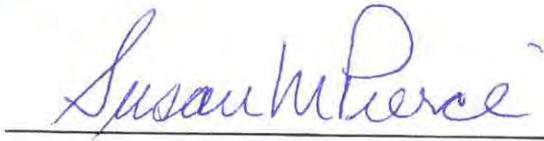
**Signatories:**

  
\_\_\_\_\_

Federal Highway Administration

6-14-19

Date

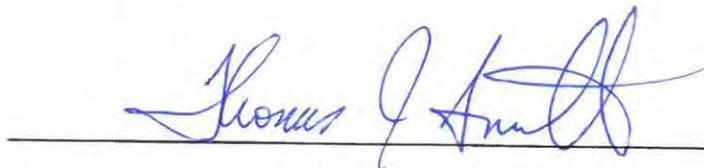
  
\_\_\_\_\_

West Virginia Deputy State Historic Preservation Officer

7/30/18

Date

**Invited Signatories:**

  
\_\_\_\_\_

West Virginia Division of Highways

8/8/18

Date