

October 8, 2020

Lynn Murphy
Transportation Planner II
Office of Environmental Planning
Cultural Resources and Environmental Documents Unit
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131-7546

RE: §106 Evaluation Letter, State Project #158-214

Dear Ms. Murphy,

After reviewing the above captioned Letter of Evaluation, the Westport Preservation Alliance offers the following commentary:

- We do not agree with the Letter's opinion that the subject structure has lost sufficient integrity of materials, design and association to cause it to no longer qualify under Criterion C. Furthermore, we note the absence of any corroborating independent analysis included in the Letter to support that opinion.
- While the Cribari Bridge's pin connected iron trusses were relieved of their live load during a 1991 rehabilitation effort, this modification was made via a MOU which sought to preserve the appearance of its most historically significant components (including the rare iron trusses) while also accommodating the demands of modern traffic. This is precisely what was done to preserve the iconic covered wooden bridge at Cornwall. In both instances, the modifications are not readily discernible to the eye.
- The Cribari Bridge is the oldest active span of any type documented to have been fabricated by the Union Bridge Company, a pioneer in the design of movable bridges. In fact, the span actually still contains two of the company's most notable (and patented) innovations; the unusual solid die-

forged eye bars and the special lattice girders which took the place of hip verticals.

- Contrary to the claim made in the Letter, the bridge has *not* lost its ability to be opened manually – a fact that we have witnessed firsthand.
- Therefore, we assert that the Cribari Bridge does indeed retain sufficient integrity of material, design and association to continue to qualify for NR status under Criterion C.
- We were surprised to find no mention in the Letter of the fact that the Cribari Bridge is, in fact, the gateway to a State Scenic Highway. As the entity that proposed this designation, we are well aware that it was approved based on both the quality and quantity of the historic resources throughout the route – starting with the subject span itself. In fact, it was the power of the historic resources located along the route that resulted in its State Scenic Highway designation – State Scenic Highways are not normally established on the basis of historic resources.
- It is not appropriate, in our view, to arbitrarily draw a line one third of the way into an established NR district and suggest that the other (contextually related) two thirds is somehow not impacted adversely. The Bridge Street National Register District neighborhood ONLY exists because of Westport's decision to build a crossing at this point and thus construct a roadway to support same.
- We do not agree that the Rehabilitation option would avoid an adverse outcome. That plan, which contemplates widening the span, would materially alter the design and feeling of the bridge and thus cause a loss of integrity. To place a finer point on this, we wish to note that the Cribari Bridge retains its original pedemented portals. These, of course, do not easily lend themselves to modifications of the sort contemplated by the Rehabilitation scheme. Any effort to widen the span as described in the

Rehabilitation section, would damage the integrity of the historic pedemented portals and thus result in an adverse impact.

- Of the four options reviewed in the report, three would result in an adverse impact while only one, Conservation, would avoid that outcome. Therefore, the Westport Preservation Alliance supports ONLY the Conservation option – an approach which, we'd like to remind you, is consistent with the Connecticut Historic Bridge Inventory and Preservation Plan – a document produced and published by the Department of Transportation in 1991.

We appreciate the opportunity to comment on the §106 process as it relates to the Cribari Bridge.

Sincerely,

John F. Suggs Helen Garten Wendy Crowther Morley Boyd

Westport Preservation Alliance