



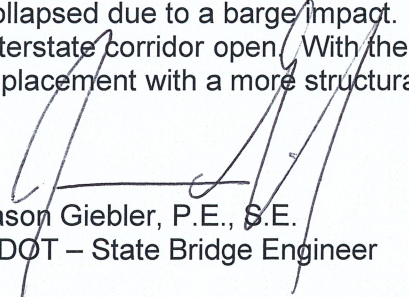
Date: September 24, 2026
To: Reviewer of SH-100 over the Arkansas River
From: Jason Giebler, P.E., S.E.
Subject: Current Condition State
and Future Load Posting/Closure of SH-100 over Arkansas River

The SH-100 over the Arkansas River bridge receives a biennial safety and condition inspection as well as a Non-Redundant Steel Tension Member (NSTM-formerly known as fracture critical)) inspection. On July 23, 2025, the most recent bridge safety and condition inspection using the Specifications for the National Bridge Inventory (SNBI) and an NSTM inspection were performed. These inspections have resulted in the bridge earning a condition rating of five (5) which puts this bridge in the 'at-risk' status. 'At-risk' designates that at any time the bridge could have structural concerns that change the rating to a 'poor' condition state (previously known as structurally deficient (SD)). Due mostly to fatigue cracks that exist in the NSTM members, additional special inspections have been performed on this bridge since a 'failure' in an NSTM structure can lead to partial or complete failure of the bridge. A special inspection was performed on July 10, 2026 to monitor the condition.

The Bridge Division has been watching the SH-100 bridge and inspections very closely. The safety and condition rating is forecasted by our engineers to become a condition state four (4) (poor) within the next couple of years. Additionally, some models are predicting the bridge to move to a condition state three (3) within twelve years.

With the SNBI inspection criteria for a condition rating of four (4) referencing strength and/or performance of the component being affected as well as with the concerns we have in the fatigue cracking in an NSTM structure, ODOT would consider load posting the bridge and reducing the truck traffic when the bridge reaches a 'poor' condition at this rating. Additionally, in accordance with 23 CFR 650 Subpart C (see attached), this bridge will have a 'critical finding' if it reaches a condition rating of three (3). This is due to an NSTM bridge rated in serious or worse condition, as defined in the NBI (§ 650.315) by the NSTM Inspection item, being coded three (3) or less. With a 'critical finding', ODOT policy requires immediate repairs or bridge closure within sixty (60) days (see attached).

SH-100 over the Arkansas is an important route that serves as one of the few crossings of the McClellan-Kerr Arkansas River Navigation System (MKARNS). Additionally, SH-100 serves as a major detour route for I-40 crossing the Arkansas River, as can be seen in 2002 when the I-40 bridge collapsed due to a barge impact. This forced the I-40 traffic to find alternate routes to keep this major interstate corridor open. With the NSTM nature of this bridge and the importance of the bridge, the replacement with a more structurally dependable bridge is highly needed.


Jason Giebler, P.E., S.E.
ODOT – State Bridge Engineer

Attachment: (reference to 23 CFR Part 650 Subpart C and Appendix I of ODOT Inspection Manual)

**APPENDIX I
BRIDGE CLOSURE/POSTING/CX FOLLOW-UP PROCEDURES**

Off System Bridge Closure/Posting/CX Follow-Up				
	Action	CX Time Line **	Closure Time Line **	Load Posting Sign***
CX	1. The bridge inspection <u>team leader</u> shall notify the bridge owner of the critical finding (CX) from the bridge site on the date of discovery. The date/time of contact should be noted in the Pontis Inspection Notes.	Day 1	N/A	N/A
	2. The <u>program manager</u> shall notify the bridge owner in writing of the critical finding. A copy of this notification is to be sent to ACCO, the proper ODOT Field Division Engineer, Field Division County Bridge Coordinator, Bridge Division Field Service Engineer, as well as the Local Government Division Engineer. Notification should be received no later than 3 days after discovery.	Day 3	N/A	N/A
	a. The document shall contain photos of the condition or member with the CX finding or condition.			
	b. The document shall make repair recommendations to the bridge owner for completion to mitigate the CX finding or condition.			
	c. The document shall convey responsibility to the owner for failure to properly follow-up with the recommended repair.			
	d. The document shall contain an action summary report if the superstructure or substructure NBIS ratings are rated at a '2'.*			
	3. The <u>program manager</u> will schedule a meeting with the owner to discuss the findings and recommendations.*	Day 7	N/A	N/A
CLOSURE/POSTING	4. The <u>ODOT Field Division County Bridge Coordinator</u> will appear at the county commissioner's meeting to discuss the findings and recommendations with the county commissioner.	First Available	N/A	N/A
	5. The <u>program manager</u> shall follow-up with the bridge owner within 14 days of discovery to determine the progress of repairs.	Day 14	N/A	N/A
	6. The <u>program manager</u> shall follow-up with the bridge owner within 28 days of discovery to determine the progress of repairs. If the owner has been non-responsive, the <u>program manager</u> shall contact the <u>ODOT Field Division County Bridge Coordinator</u> for assistance to facilitate a plan of action to complete repairs.*	Day 28	N/A	N/A
	7. The <u>program manager</u> and <u>ODOT Field Division County Bridge Coordinator</u> will maintain contact with the owner to monitor repair activities. If at the end of 60 days no action has been taken, the <u>program manager</u> will revise the CX letter to a closure letter.	Day 60	N/A	N/A
	The <u>program manager</u> shall notify the bridge owner in writing of bridge closure/posting recommendations. A copy of the closure/posting notification is to be sent to ACCO, the proper ODOT Field Division Engineer, Field Division County Bridge Coordinator, Bridge Division Field Service Engineer, as well as the Local Government Division Engineer.	Day 60	Day 1	Day 1
	a. The document shall contain photos of the condition or member which is the causation of the closure/posting recommendation.			
	b. The document shall contain schematics/recommendations to render the bridge impassable after closure.			
	c. The document shall convey responsibility to the owner for failure to properly render the structure impassable in the appropriate time frame.			
	8. The <u>program manager</u> will schedule a meeting with the owner to discuss the findings and recommendations.*	Day 67	Day 7	Day 7
	9. The <u>ODOT Field Division County Bridge Coordinator</u> will appear at the county commissioner's meeting to discuss the closure/posting recommendation with the county commissioner.	First Available	First Available	First Available
	9. The <u>program manager</u> will follow up with the owner 14 days after issuance of the closure/posting recommendation.	Day 74	Day 14	Day 14
	10. The <u>program manager</u> will follow up with the owner 28 days after issuance of the closure/posting recommendation.	Day 88	Day 28	Day 28
	11. If the <u>program manager</u> has received no response or indication of closure/posting at 30 days ODOT will coordinate with the FHWA to withhold federal funding.	Day 90	Day 30	Day 30
If at any point during the CX/Closure/Posting timelines action has been taken by the owner to mitigate the outstanding issues, the <u>program manager</u> will notify ODOT for updating the BrM				
* - If required				
** - Maximum time frames. Issues may exist that warrant more expedient action on the part of the program manager or owner.				
*** - As required by contract and FHWA.				

(q) *Critical findings.*

(1) Document procedures to address critical findings in a timely manner. Procedures must:

(i) Define critical findings considering the location and the redundancy of the member affected and the extent and consequence of a deficiency. Deficiencies include, but are not limited to scour, damage, corrosion, section loss, settlement, cracking, deflection, distortion, delamination, loss of bearing, and any condition posing an imminent threat to public safety. At a minimum, include findings which warrant the following:

(A) Full or partial closure of any bridge;

(B) An NSTM to be rated in serious or worse condition, as defined in the NBI (see § 650.315) by the NSTM Inspection item, coded three (3) or less;

(C) A deck, superstructure, substructure, or culvert component to be rated in critical or worse condition, as defined in the NBI (see § 650.315) by the Deck, Superstructure, or Substructure Condition Rating items, or the Culvert Condition Rating item, coded two (2) or less;

(D) The channel condition or scour condition to be rated in critical or worse condition as defined in the NBI (see § 650.315) by the Channel Condition Rating or Scour Condition Rating items, coded critical (2) or less; or

(E) Immediate load restriction or posting, or immediate repair work to a bridge, including shoring, in order to remain open.

(ii) Develop and document timeframes to address critical findings identified in paragraph (q)(1)(i) of this section.

(2) State transportation departments, Federal agencies, and Tribal governments must inform FHWA of all critical findings and actions taken, underway, or planned to resolve critical findings as follows:

(i) Notify FHWA within 24 hours of discovery of each critical finding on the National Highway System (NHS) as identified in paragraphs (q)(1)(i)(A) and (B) of this section;

(ii) Provide monthly, or as requested, a written status report for each critical finding as identified in paragraph (q)(1)(i) of this section until resolved. The report must contain:

(A) Owner;

(B) NBI Structure Number;

(C) Date of finding;

(D) Description and photos (if available) of critical finding;

(E) Description of completed, temporary and/or planned corrective actions to address critical finding;

(F) Status of corrective actions: Active/Completed;

(G) Estimated date of completion if corrective actions are active; and

(H) Date of completion if corrective actions are completed.