October 14, 2011

Ms. Janice Osadczuk
Engineering Services Team Leader
Federal Highway Administration – Indiana Division
Room 254, Federal Office Building
575 North Pennsylvania Street
Indianapolis, Indiana 46204

Dear Janice:

Ohio River Bridges Project Consulting Party Butchertown Neighborhood Association, Inc. ("BNA") hereby submits the following comments relating to the identification of historic resources pursuant to Section 106.

BNA supports the finding of Ratio Architects and Wilbur Smith Associates (the "Project Team") that the portion of the Butchertown Historic District ("BHD") falling within the 2003 Area of Potential Effects ("2003 APE") falls within the Project Team's proposed 2011 Area of Potential Effects ("2011 APE").

BNA opposes the Project Team's finding, however, that the BHD as a whole does not fall within the 2011 APE. That is, BNA believes that the BHD in its entirety will be affected at the district or neighborhood level by changes in traffic patterns from the project and, therefore, must be included within the 2011 APE. BNA requests that The Louisville – Southern Indiana Ohio River Bridges Project ("LSIORBP") amend the 2011 APE to include those portions of the BHD east of I-64 along Frankfort and Story Avenues and west of I-64 to its southernmost boundaries. The BNA's recommendation would then include previously omitted historic assets such as the Thomas Edison House, Marcus Lindsey Memorial Church, Linden Hill, St Joseph's Catholic Church, The Mary Alice Hadley house and many others.

BNA also urges LSIORBP to expand the 2011 APE to include the "doughnut hole" roughly bounded by Witherspoon Street to the north, Market Street to the south, Jackson Street to the east, and 2nd Street to the west. This historic east downtown area comprises one of the BNA's primary commercial and recreational destinations and BNA residents are concerned about the traffic impact of the project on their use and enjoyment of the district.

Thank you for considering the BNA's comments on identification of historic resources. We take our responsibility as a consulting party to this project very seriously and look forward to working with LSIORBP and the Project Team on next steps.

Sincerely,

Andy Cornelius
President, BNA

CITY OF JEFFERSONVILLE

OFFICE OF THE MAYOR
The Honorable Thomas R. Galligan

Jeffersonville City Hall
500 Quartermaster Court
Jeffersonville, Indiana 47130

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October 10, 2011

Ms. Janice Osadczuk
Engineering Services Team Leader
Federal Highway Administration – Indiana Division
Room 254 Federal Office Building
254, 575 North Pennsylvania Street
Indianapolis, Indiana 46204

LSIORB Section 106 Review Comments
Area of Potential Effect (APE) and
Identification of Historic Properties

Dear Ms. Osadczuk:

The City of Jeffersonville, as a consulting party, would like to express concern over comments made at the most recent Section 106 consulting parties meeting. Several individuals indicated that historic districts affected, in part, by the expanded APE should be treated as being affected in total. We do not agree with this approach. The expanded APE was intended to reflect indirect effects from possible traffic rerouting due to tolling. The effect of such rerouting on the remainder of an historic district not in the expanded APE would be an indirect effect of an indirect effect. In that manner of reasoning, the entire city of Jeffersonville should be considered as being affected. This devalues the logic behind the original APE and renders meaningless any conclusions drawn regarding the effects of the bridge, as well as new traffic patterns.

The City also does not believe that the existing National Register Historic District should be expanded as a way of "protecting" surrounding areas from possible future infrastructure reconstruction. Such improvements could be required for any number of reasons not having anything to do with new bridges. To restrict future activities for only one potential cause would be irresponsible to the citizens of Jeffersonville. If the resources were present to warrant larger historic district boundaries, the district would have been drawn larger originally. The areas in question, to the north and east of the original boundaries, have not experienced an increase in density or an improvement in condition of historic structures since the district was formed. To expand it simply for some nebulous future protection is a kneejerk reaction to a far-reaching, questionable consequence.

We continue to be very serious about our roles as consulting parties in this landmark project. Please contact us if any clarification of this opinion is necessary.

Sincerely,

Thomas R. Galligan, Mayor
City of Jeffersonville

Brian Fogle, Director
Planning and Zoning

Jeff Vlach

From: John Sacksteder [jsacksteder@ctsgec.com]
Sent: Friday, October 14, 2011 11:49 AM
To: Jeff Vlach; 'Jim Hilton '
Subject: FW: Eastern Band of Cherokee Indians Tribal Historic Preservation Office

fyi

From: Valentine, Gary (KYTC-D05) [mailto:Gary.Valentine@ky.gov]
Sent: Friday, October 14, 2011 10:27 AM
To: Mettille, John L.; Springer, Tom
Cc: John Sacksteder; Boone, Paul; Kevin Hetrick; Barber, Andy (KYTC-D05)
Subject: FW: Eastern Band of Cherokee Indians Tribal Historic Preservation Office

fyi

From: Janice.Osadczuk@dot.gov [mailto:Janice.Osadczuk@dot.gov]
Sent: Friday, October 14, 2011 10:19 AM
To: jsacksteder@ctsgec.com; khetrick@indot.in.gov; Valentine, Gary (KYTC-D05)
Cc: MaryAnn.Naber@dot.gov
Subject: FW: Eastern Band of Cherokee Indians Tribal Historic Preservation Office

---

From: Tyler B. Howe [mailto:tylehowe@nc-cherokee.com]
Sent: Friday, October 14, 2011 10:16 AM
To: Osadczuk, Janice (FHWA)
Subject: Eastern Band of Cherokee Indians Tribal Historic Preservation Office

Ms. Osadczuk:

The Eastern Band of Cherokee Indians Tribal Historic Preservation Office (EBCI THPO) thanks you for the opportunity to continue to consult on the Ohio River Bridges Project. While we were not able to make the most recent consultation in person, we were able to teleconference the meeting. At this time, we do not have any comments per say, as this most recent consultation pertained to historic structures, and not American Indian archaeological sites. The EBCI THPO stands ready to continue to consult, and suggests the Federal Highways Administration organize a consultation specifically with those federally recognized American Indian Nations whose traditional aboriginal territory falls within the Area of Potential Effect to discuss the archaeological / historical / and cultural portion of the proposed federal undertaking that might pertain to those tribes.

Sincerely,

Tyler B. Howe
Tribal Historic Preservation Specialist
Eastern Band of Cherokee Indians

DNR Indiana Department of Natural Resources

Mitchell E. Daniels, Jr., Governor
Robert E. Carter, Jr., Director

Division of Historic Preservation & Archaeology • 402 W. Washington Street, W274 · Indianapolis, IN 46204-2739
Phone 317-232-1646 • Fax 317-232-0693 · dhpa@dnr.IN.gov

HISTORIC PRESERVATION AND ARCHAEOLOGY

October 14, 2011

Janice Osadczuk
Federal Highway Administration, Indiana Division
575 North Pennsylvania Street, Room 254
Indianapolis, Indiana 46204

Federal Agency: Federal Highway Administration ("FHWA")

Re: September 29, 2011, consulting parties eligibility meeting and "Section 106 Identification Workbook" (as revised on September 29) for the Louisville-Southern Indiana Ohio River Bridges Project (HDA-IN; INDOT Des. Nos. 0201294, 0300798, 0201296, 0201297; DHPA No. 1774)

Dear Ms. Osadczuk:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. § 470f), and implementing regulations at 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer has reviewed the information that we received on September 14 and 29, 2011, regarding the aforementioned project in Clark County, Indiana and Jefferson County, Kentucky.

Because of the similarity of circumstances of many of the properties identified in the Section 106 Identification Workbook (as revised on September 20, 2011), we will group our comments on Indiana properties by area in most instances, rather than commenting on the evaluations of each property.

2003 Area of Potential Effects for the Downtown Bridge—Jeffersonville and Clarksville, Clark County

We agree with the change proposed in the workbook regarding the National Register of Historic Places evaluation of the following property:

ID-HC-63001-63009, Colgate-Palmolive Historic District: increase in number of contributing properties from six to 13.

In all other respects, for the purposes of the Section 106 review of this undertaking, we agree with the evaluations of properties documented in the workbook for this area.

2003 Area of Potential Effects for the East End Bridge—Clark County

We concur that the Utica Lime Kilns (#019-305-48001-004) are eligible for the National Register of Historic Places as a multiple property group under criteria A and D. We believe that the archaeological features, above and below ground, are eligible under criteria A and D. Please provide the rationale and justification for the boundaries of the sites, especially as there were reported archeological deposits (Striker et al. 2000:121) between the eastern and western kilns (48002 and 48003) of archaeological site 12 Cl 561. If any preparation, staging, use areas, or archaeological deposits associated with the kilns are present on top of the quarry walls, they should be included in the boundaries of the individual properties.

We agree with the changes proposed in the workbook regarding the National Register evaluations of the following properties:

Swartz Farm Rural Historic District: not eligible due to partial demolition;

IE-HC-55012B, Farmhouse at 2307 Utica Pike: not eligible due to demolition;

45054, 019-305-45054, Thomas Benton Jacobs House at 4002 Utica Pike: eligible under Criterion C;

IE-HC-45024, James A. Smith Farmstead on the Utica-Sellersburg Road: formerly eligible under criteria A and D, now eligible only under Criterion D, due to loss of integrity of the house as a result of a fire.

In all other respects, for the purposes of the Section 106 review of this undertaking, we agree with the evaluations of properties documented in the workbook for this area.

2011 Expanded Area of Potential Effects for the Downtown Bridge—Clark and Floyd Counties

For the purposes of the Section 106 review of this undertaking, we agree with the National Register evaluations of properties documented in the workbook for this area.

If you have questions about our comments here, then you may contact John Carr of my staff at (317) 233-1949 or jcarr@dnr.in.gov. Questions about archaeological issues should be directed to Dr. Rick Jones at (317) 233-0953 or rjones@dnr.IN.gov. In all future correspondence regarding the Louisville-Southern Indiana Ohio River Bridges Project, please refer to DHPA No. 1774.

Very truly yours,

James A. Glass, Ph.D.
Deputy State Historic Preservation Officer

JAG:JLC:JRJ:jlc

emc: MaryAnn Naber, Federal Highway Administration, Washington, D.C.
Janice Osadczuk, Indiana Division, Federal Highway Administration
Michelle Allen, Indiana Division, Federal Highway Administration
Duane Thomas, P.E., Kentucky Division, Federal Highway Administration
Carol Legard, Advisory Council on Historic Preservation
Laura Hilden, Indiana Department of Transportation
Staffan Peterson, Ph.D., Indiana Department of Transportation
Mary Kennedy, Indiana Department of Transportation
Shaun Miller, Indiana Department of Transportation
Patrick Carpenter, Indiana Department of Transportation
Melany Prather, Indiana Department of Transportation
Kevin Hetrick, Indiana Department of Transportation
Paul Boone, Indiana Department of Transportation
Lindy Casebier, Acting Kentucky State Historic Preservation Officer
Craig Potts, Kentucky Heritage Council
John Sacksteder, P.E., Community Transportation Solutions-General Engineering Consultant
Jeffrey Vlach, Beam, Longest & Neff, L.L.C.
John Mettille, Wilbur Smith Associates
David Kroll, Ratio Architects, Inc.
Kevin Senninger, Ratio Architects, Inc.

STEVEN L. BESHEAR
GOVERNOR

TOURISM, ARTS AND HERITAGE CABINET
KENTUCKY HERITAGE COUNCIL

MARCHETA SPARROW
SECRETARY

THE STATE HISTORIC PRESERVATION OFFICE
300 WASHINGTON STREET
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LINDY CASEBIER
ACTING EXECUTIVE DIRECTOR AND
STATE HISTORIC PRESERVATION OFFICER

October 14, 2011

Janice Osadczuk
Engineering Services Team Leader
Federal Highway Administration
Federal Office Building, Room 254
575 North Pennsylvania Street
Indianapolis, IN 46204

Re: Louisville-Southern Indiana Ohio River Bridges project SEIS; Section 106 Identification Workbook

Dear Ms. Osadczuk:

On September 13, 2011, the Kentucky Heritage Council, State Historic Preservation Office received the above-referenced workbook in anticipation of the September 29, 2011 Consulting Party Meeting held at the Crowne Plaza Hotel in Louisville, Kentucky. Subsequent updates were provided electronically on September 29, 2011. The workbook is organized in four sections, which include updated (albeit preliminary) eligibility (for the National Register of Historic Places, or NRHP) determinations on properties within the original Area of Potential Effect, or APE (Section 2), an evaluation of the expansion of the original APE to account for additional potential effects (Section 3), and (preliminary) eligibility determinations on properties within the 2011 expansion of the APE. It is understood that within the expanded APE effects are expected to be only indirect and will be assessed at a district or neighborhood level. Therefore, all properties over 45 years of age will be treated as eligible for the NRHP within those areas for the purposes of this project. We have reviewed the information within the workbook, and we offer comments on the following **additions to/changes from** the 2003 Final Environmental Impact Statement (FEIS) determinations:

Section 2

We concur with the new determinations in this section, which include the eligibility of the MPDF Ohio River Camps Historic District, and the change of JF-2007 (Eifler's Beach, 5209 River Road) from not eligible to a contributing resource in this district. We also concur that 6100 and 6306 Transylvania Beach, previously determined individually eligible for the NRHP, are contributing resources in this district. We likewise concur that the 20th Century Suburban Historic District is eligible.

The Jacob School Road Historic was previously determined eligible with 13 contributing properties. The update lists only 12 contributing properties. There is no additional information to explain the change. We concur that the Kerzinger House, 7314 River Road, and Stone Place Stables, 7718 Rose Island Road, previously determined not eligible, are now eligible for the NRHP.

Section 3

This section addresses changes to the APE, specifically related to the expansion of the APE to account for indirect effects due to changes in the design of the selected alternates as well as to account for the impacts of tolling. The workbook states "Because the proposed design changes are expected to fit within the original footprint of the project, additional direct effects are not anticipated." In our letter dated August 11, 2011, our office provided comments regarding the expansion of the APE to account for indirect impacts due to tolling. In the same month, a general overview of the changes to the design of the alternatives was submitted by FHWA as part of the Draft Range of Alternatives Document, but specific information about how those changes might impact vibration levels (a direct effect), particularly in regards to the excavation changes planned for the tunnel, have not yet been presented. We will reserve our comments on the potential for additional direct effects within or beyond the APE when more detailed information on the changes to the design have been submitted for our review as part of the effects phase of the 106 process.

In regards to the APE discussion that took place at the meeting, we would like to comment that we share the concerns raised by other consulting parties in regards to historic districts that are bi-sected or otherwise split by the APE. FHWA and KHC have traditionally considered historic districts as a single entity, even though the APE boundary may not reflect that fact, when evaluating effects of an undertaking. Effects must be evaluated on the district as a whole, so as to ensure that the characteristics that make the resource eligible for the National Register are fully considered relative to potential impacts.

Section 4

This section deals with the status of historic properties within the expanded APE. While all properties over 45 years of age will be treated as eligible for the NRHP for the purpose of determining indirect impacts, preliminary eligibility determinations were made for a representative sample of properties within the expanded APE. We concur with the re-evaluation of resources whose eligibility did not change and also the following new eligibility determinations:

100 E. Broadway/201 S. First Street
129 E. Broadway
102 W. Main Street
104 W. Main Street
106 W. Main Street
110 W. Main Street
111 W. Main Street
113 W. Main Street
115 W. Main Street
117 W. Main Street
119 W. Main Street
122 W. Main Street
123 W. Main Street
124 W. Main Street
301 W. Market Street
303 W. Market Street
313-315 W. Market Street
211-215 W. Muhammad Ali Blvd.
230 W. Muhammad Ali Blvd.
301-305 W. Muhammad Ali Blvd.
456 S. Second St. (not eligible)
501 S. Second Street
427 S. Third Street
438 S. Third Street
455 S. Third Street
503 S. Third Street
659 S. Third Street
2035-2039 River Road

However, it should be noted that the properties located at 105-133 W. Main have now been officially listed in the National Register of Historic Places as the Whiskey Row Historic District. We also concur that 114 W. Main Street and 652 S. Second Street are not individually eligible. However, we feel they do retain enough integrity to be considered as contributing resources within a historic district.

We thank you for providing us with the opportunity to comment on this identification of historic resources workbook. We look forward to working with you and other consulting parties on the finalization of these determinations and the effects phase of the Section 106 process. If you have questions regarding these comments, please contact Craig Potts of my staff at (502) 564-7005, ext. 123.

Sincerely,

Lindy Casebier
Acting Executive Director and
State Historic Preservation Officer

Cc: Gary Valentine (KYTC)
Amanda Abner (KYTC)
Duane Thomas (FHWA)
John Sacksteder (CTS-GEC)
Jeff Vlach (CTS-GEC)

LC:vmb

DEPARTMENT OF CODES & REGULATIONS
HISTORIC LANDMARKS AND PRESERVATION DISTRICTS COMMISSION
LOUISVILLE, KENTUCKY

GREG FISCHER
MAYOR

JAMES L. MIMS, PhD, AICP
DIRECTOR

October 12, 2011

Ms. Janice Osadczuk
Federal Highway Administration, Indiana Division
575 North Pennsylvania Street, Room 254
Indianapolis, Indiana 46204

Dear Ms. Osadczuk:

Following are comments on the proposed Area of Potential Effect and Preliminary Eligibility Determinations identified in the Identification Workbook for the LSIORB Section 106 Process, September 2011:

2011 Extensions to the Original APE

I concur with the proposed extension to the Original APE.

Status of Historic Properties in the 2011 APE

For the most part, I concur with the eligibility determinations; however, I do offer the following (with reference when applicable to workbook page numbers):

Pages 213/282 – I question the need to note "Outstanding" properties since the relevant determination is that a property be "eligible" or "not eligible" for listing in the National Register.

Page 220 – The structure located on the southeast corner of Third and Jefferson Streets (Marriott Hotel) is a modern reconstruction of the historic Coleman Building façades using salvaged historic stone trim elements. It is not eligible.

Page 236 (102 W. Main St.), Page 237 (104 W. Main St.), Page 239 (106 W. Main St.), page 241 (110 W. Main St.), 244 (114 W. Main St.), Page 249 (122 W. Main St.), 124 W. Main St. – These should be evaluated as part of an eligible district that includes the north side of the 100 block of West Main Street. The structure located at 114 W. Main is more easily understood as eligible within this context.

Page 242 (111 W. Main Street), Page 243 (113 W. Main St.), Page 245 (115 W. Main St.), Page 246 (117 W. Main St.), Page 247 (119 W. Main Street), Page 248 (W. Main St.), and Page 250 (123 W. Main St.) – In the past, these structures were all officially determined eligible and with the relatively recent removal of a majority of owner objections, Whiskey Row was formally listed.

Page 297 (301-305 W. Muhammad Ali Blvd.) – This structure was completed in 1985 and is not eligible.

Historic Properties Not Included in the Workbook

200 W. Chestnut Street (L&N Federal Credit Union) – This structure was built in 1923 and is a good example of the Colonial Revival Style. It should be evaluated as eligible.

135 W. Muhammad Ali Blvd. (Former *Louisville Magazine* Office) – This 1962 structure is a good example of Mid-Century Modernism and should be evaluated as eligible.

Thanks for the opportunity to comment. Let me know if you have questions or if I can provide additional assistance.

Sincerely,

Richard T. Jett

Richard T. Jett
Metro Historic Preservation Officer

From:	John Sacksteder
To:	"Springer, Tom"; Jmettille@wilbursmith.com; ckowalski@ctsgec.com; "Cory Grayburn"; Jim Hilton; jvlach@b-l-n.com; "Kenneth Hess"; Rich Dutton
Subject:	FW: Neighborhood Preservation and Planning, Inc. (NPP) comments re ORBP Section 106
Date:	Thursday, October 20, 2011 11:29:15 AM

fyi

From: Janice.Osadczuk@dot.gov [mailto:Janice.Osadczuk@dot.gov]
Sent: Monday, October 17, 2011 8:24 AM
To: jsacksteder@ctsgec.com; khetrick@indot.in.gov; Gary.Valentine@ky.gov
Cc: Linda.Amidon@dot.gov; Anthony.Goodman@dot.gov; Diane.Mobley@dot.gov; MaryAnn.Naber@dot.gov; Ruth.Rentch@dot.gov
Subject: FW: Neighborhood Preservation and Planning, Inc. (NPP) comments re ORBP Section 106

From: Neighborhood Planning & Preservation , Inc. [mailto:nppkentuckiana@gmail.com]
Sent: Friday, October 14, 2011 10:53 PM
To: Osadczuk, Janice (FHWA)
Subject: Neighborhood Preservation and Planning, Inc. (NPP) comments re ORBP Section 106

October 14, 2011

Ms. Janice Osadczuk
Engineering Services Team Leader
Federal Highway Administration – Indiana Division
Room 254, Federal Office Building
575 North Pennsylvania Street
Indianapolis, Indiana 46204

Dear Ms. Osadczuk:

By this letter, Neighborhood Planning and Preservation, Inc. (NPP) would like to submit the following comments regarding the identification of historic resources pursuant to Section 106.

Fundamentally, NPP opposes the Project Team's determination that the Butchertown Historic Preservation District (BHPD) on as a whole does not fall within the 2011 APE. We believe that BHPD in its entirety will be affected at the district or neighborhood level by changes in traffic patterns from the project and, therefore, must be included within the 2011 APE. NPP requests that The Louisville – Southern Indiana Ohio River Bridges Project ("LSIORBP") amend the 2011 APE to include those portions of the BHD east of I-64 along Frankfort and Story Avenues and west of I-64 to its southernmost boundaries. The NPP's recommendation would then include previously omitted historic assets such as the Thomas Edison House, Marcus Lindsey Memorial Church, Linden Hill, St Joseph's Catholic Church, and many others.

NPP supports the finding of Ratio Architects and Wilbur Smith Associates (the "Project Team") that the portion of the Butchertown Historic District ("BHD") falling within the 2003 Area of Potential Effects ("2003 APE") falls within the Project Team's proposed 2011 Area of Potential Effects ("2011 APE").

NPP also urges LSIORBP to expand the 2011 APE to include the "doughnut hole" roughly bounded by Witherspoon Street to the north, Market Street to the south, Jackson Street to the east, and 2nd Street to the west. This historic east downtown area comprises one of the Butchertown's primary commercial and recreational destinations and Butchertown residents are concerned about the traffic impact of the project on their use and enjoyment of the district.

We appreciate your incorporating our comments into the body of resources that project leaders are using make their decision.

--
It is up to all of us,

Martina N. Kunnecke
President
Neighborhood Planning & Preservation, Inc. (NPP)

NATIONAL TRUST FOR HISTORIC PRESERVATION®

October 14, 2011

John Sacksteder, PE,
Project Manager
Community Transportation Solutions
Louisville - Southern Indiana Ohio River Bridges Project
305 N. Hurstbourne Lane, Suite 100
Louisville, KY 40223

Re: Comments on Section 106 Identification Workbook for Ohio River Bridges Project Supplemental EIS

Dear Mr. Sacksteder:

On behalf of the National Trust for Historic Preservation, we appreciate the opportunity to submit comments on the Section 106 Identification Workbook for the Ohio River Bridges Project. Our comments relate to the proposed Area of Potential Effects (APE), and the proposed identification of historic properties within the APE.

The Section 106 regulations provide for a 30-day review period for each step of the process, including the identification of historic properties. *See* 36 C.F.R. §§ 300.3(c)(4), 800.4(d). In this case, despite the complexity of the issues, the agencies have cut that comment period in half for the identification phase. The consulting parties have bent over backwards to accommodate this expedited deadline. However, we are concerned that short-circuiting the time for review and comment by consulting parties is inappropriate and will back-fire in the long run if issues are not properly resolved. We urge the agencies to ensure that the full 30-day comment period is allowed for future phases of the consultation.

I. The Area of Potential Effects Needs to be Expanded.

A. The 2011 Extended APE for Traffic Impacts is Incomplete.

We commend the agencies for recognizing that traffic diversion in response to tolls will indeed have potential adverse effects on historic properties, and we appreciate the effort to develop a methodology for attempting to predict where these potential effects will occur. However, there are two key respects in which this APE for traffic diversion needs to be expanded: (1) A separate traffic diversion scenario needs to be developed by applying the methodology to the Eastern-Bridge-only alternative, and the results need to be incorporated into the 2011 Extended APE. (2) There are a variety of specific locations where the consulting parties have raised concerns that the formulaic methodology alone may not fully capture traffic diversion effects that are "reasonably foreseeable." 36 C.F.R. § 800.5(a)(1).

1. Expand the Extended APE to Include Eastern-Bridge-Only Traffic Diversion Patterns.

Since the Draft Range of Alternatives Document states that single-bridge alternatives will be included within the scope of the SEIS ("All Alternatives Previously Evaluated

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in the 2003 FEIS," DRAD at p.21)—an approach that we strongly endorse and we believe is mandatory—the Extended APE for traffic diversion must be expanded in order to include traffic diversion patterns for both of the single-bridge alternatives, in addition to the current projections for the two-bridge alternative. This will be especially important for the Eastern-Bridge-Only alternative, which would be expected to create substantially different traffic diversion patterns than the two-bridge alternative.

2. Refine the Extended APE in Specific Locations Where Consulting Parties Have Raised Concerns.

Any predictive model has its limitations, including the risk of "garbage in, garbage out," and erroneous assumptions may not be discovered until it is too late. Therefore, it is important to err on the side of caution by avoiding the overly rigid application of a formulaic methodology. In this case, the consulting parties seemed to agree that most of the projected areas for the extended APE are consistent with common sense, and that traffic diversion would indeed be likely to affect these areas in some way (for example, New Albany). However, there were some areas in which the consulting parties raised concerns that the formulaic methodology may not have fully captured a potential risk of significant traffic diversion. The agencies need to engage in additional consultation regarding these disagreements about the 2011 Extended APE.

- *East Main Street and East Market Street.* In downtown Louisville, the formulaic methodology results in an APE that excludes an area of about nine or ten square blocks right in the heart of downtown. This excluded area covers several blocks of East Main Street and East Market Street, as illustrated on Page 213. The excluded area also covers two square blocks of the Phoenix Hill Historic District, as well as the baseball stadium, which is itself a destination for traffic. During the September 29 Section 106 meeting, consulting parties pointed out that the map seemed to defy common sense, and that traffic diversion was unlikely to stop or change dramatically in between First and Second Street. Representatives of the agencies or consultants seemed to acknowledge that the exclusion of this ten-square block area from the 2011 Extended APE seemed a bit arbitrary, and suggested that it would be reevaluated. We strongly urge the agencies to expand the APE to include the entire ten-square-block of East Main Street and East Market Street that is currently carved out of the APE.

- *Phoenix Hill and Butchertown Historic Districts*. In our view, this reevaluation of traffic diversion impacts should also extend further to the east to include the Phoenix Hill and Butchertown Historic Districts. Although portions of these two historic districts are within the 2003 APE, a review of the maps suggests that additional areas of these historic districts could well be affected by cut-through traffic heading to or from bridges that are toll-free.

- *West Louisville.* Consulting parties also questioned the assumption that no significant traffic diversion effects would occur on the Kentucky side of the Sherman-Minton Bridge, especially since the methodology projects that a substantial area will be potentially affected by traffic diversion on the Indiana side of the bridge, in New Albany (Pages 6 and 94). The agencies' response was that the diverted traffic would be limited to the Interstate highways on the Kentucky side. In our view, the potential traffic diversion impacts on West Louisville and Portland need to be evaluated in more detail. The views of local consulting parties, based on their local experience, that diverted traffic will not be limited to the Interstate highways, should be taken very seriously. Among other things, we note that Northwestern Parkway passes in extremely close proximity to the U.S. Marine Hospital, which is a National Historic Landmark. The data for this route should be included in the disclosure process discussed below, and should be carefully reviewed with the consulting parties to reevaluate the potential for adverse effects from traffic diversion here.

- *River Road Corridor.* The map on Page 282 shows that the 2011 Extended APE along the River Road corridor includes the riverfront—except for a small stretch between Riverfront Park and the Louisville Rowing Club. No explanation is offered for excluding this segment of riverfront from the Extended APE. Nor does it make any sense to carve out this one segment from the overall APE. We urge the agencies to include it.

3. Disclose Data.

One helpful approach to resolving the disagreements about the Extended APE for traffic would be to start by disclosing more specific information about the results of the methodology within the disputed areas, such as the projected increases in Average Daily Traffic and the projected Volume-to-Capacity Ratios for the excluded portions of East Main Street, East Market Street, and key streets in Phoenix Hill, Butchertown, West Louisville, and Portland. This additional information would provide a way for the consulting parties to understand the specific basis for the initial proposed APE boundary, including, for example, whether particular streets are close to meeting the numerical criteria set by the formula.[1] It would also enable the local consulting parties to address more specifically whether there are ways in which the results of the formula seem inconsistent with local experience regarding traffic patterns. The National Trust joins in these requests for additional documentation, and we urge the agencies to expand the 2011 APE relating to the potential effects of traffic diversion to include these additional areas.

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[1] "The agency official shall ensure that a determination [or] finding . . . is supported by sufficient documentation to enable any reviewing parties to understand its basis. The agency official shall provide such documentation to the extent permitted by law and within available funds." 36 C.F.R. § 800.11(a).

B. The APE Cuts Off Portions of Historic Districts Without Justification.

There are a number of places where the APE excludes portions of historic districts without adequate substantiation. In most of these cases, the APE boundaries were simply carried over from the 2003 APE. Yet the 2003 documentation fails to provide detailed documentation or support for the decisions to cut through districts. These need to be reevaluated, and either substantiated or corrected.

- *Country Estates of River Road.* First, the 2003 APE is erroneously depicted on Page 63 as chopping off a chunk of the Country Estates Historic District at the southern end of the district. This depiction of the 2003 APE is inconsistent with the documentation from the Section 106 consultation during 2001-2002. The APE maps produced and relied on during that earlier Section 106 consultation show the APE boundary as including and coinciding with the boundary of the Country Estates Historic District at that location—*not* chopping off a piece of the district.[2] This error needs to be corrected.

- *Butchertown Historic District*. The map on Page 26 shows that the eastern edge of the Butchertown Historic District is excluded from the APE (approximately two to four square blocks along Story Avenue and Frankfort Avenue). We agree with the Butchertown Neighborhood Association that the APE should be expanded to include this area. It defies common sense that all potential adverse effects will magically stop at the red line drawn on this map. Given the extremely close proximity of this historic district to the Spaghetti Junction, we believe that a much greater portion of the historic district should be included within the APE, especially due to the likelihood of construction impacts (e.g., vibration, noise, cut-through traffic by heavy trucks, etc.).

- *Phoenix Hill Historic District.* The map on Page 26 also shows only one-and-a-half square blocks of the Phoenix Hill Historic District included within the APE. As is the case with Butchertown, it is difficult to believe that all potential effects will stop at these red lines, particularly considering the likelihood for construction and traffic diversion impacts. We urge you to expand the APE for Phoenix Hill as well.

- *James Taylor Subdivision Historic District.* The map on Page 62 shows that the vast majority of the James Taylor district is carved out of the APE. This does accurately coincide with the gerrymandered way in which the 2003 APE was drawn (in contrast to the error regarding the Country Estates

[2] These maps include "Kentucky Index – Near East (Sheet 2)," "Alternative Area of Potential Effect Overall (Figure 4.3-2)," and "Alternative Area of Potential Effect Mid East (Figure 4.3-6)."

Historic District referenced above). However, the earlier Section 106 materials from 2001-2002 fail to articulate any rational basis for carving out the James Taylor Historic District while at the same time including the adjacent Jacob School Road Historic District. (See Pages 181-187 of the 2002 Assessment of Effects materials.) In addition, the 2003 APE did not include any consideration of potential traffic impacts along US 42 and River Road, which are very close to the edge of the historic district. We urge you to reevaluate this boundary and include the James Taylor Subdivision Historic District within the APE.

- *Upper River Road Historic District and River Hill/Stonebridge Historic District.* The map on Page 63 shows that the 2003 APE cuts through the Upper River Road and River Hill/Stonebridge[3] historic districts in a way that appears fairly arbitrary. More explanation should be provided about what topographic features or other rationale supports these boundaries, and adjust the APE to ensure that it is consistent with areas that could be subject to potential visual and traffic impacts.

C. West Louisville is Improperly Excluded from the Broad APE.

During the Section 106 review leading up to the 2003 Memorandum of Agreement, the consulting parties disputed one aspect of the Broad APE that needs to be revisited. The Broad APE fails to address the potential for disproportionate economic disinvestment in historic neighborhoods in West Louisville, as a result of the new development in Southern Indiana that the proposed Eastern Bridge is intended to induce. River Fields in particular submitted two detailed studies showing that West Louisville would be hard hit by economic disinvestment as a result of the sprawl generated in southern Indiana by the proposed Eastern Bridge. *See* David Rusk, *The Impact of Urban Sprawl on African American Home Values and Assessed Valuation of Property in the Urban Core* (Feb. 13, 2002); Savitch & Vogel Consultants, *Ohio River Bridges Project: Sprawl and Urban Disinvestment* (Feb. 20, 2002).[4] These studies made a strong case that historic properties in West Louisville would be adversely and disproportionately affected by the long-term economic impacts of the Eastern Bridge.

The agencies cannot continue to hide from this issue. The *potential* for adverse long-term cumulative effects is clear, and must be included within the Broad APE. Adverse effects include "reasonably foreseeable effects caused by the undertaking

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[3] Note that the map index on Page 63 contains a typographical error—Stonebridge is erroneously spelled as "Stonbridge."

[4] Both of these studies were included in full as an attachment to Section 4 of River Fields' comments on the Draft EIS in 2002.

that may occur later in time, be farther removed in distance or be cumulative." 36 C.F.R. § 800.5(a)(1).

II. Disputed National Register Eligibility Issues Should be Referred to the Keeper of the National Register.

As we have commented previously, additional evaluation needs to be conducted regarding the National Register eligibility of the Nuttall House and the north field of the Belleview property. We understand from the updated materials that site visits were conducted at both sites on September 12, 2011, and informal reevaluations were conducted. These recent investigations were "summarize[ed]" on pages 78a-78b and 80a-80b of the workbook. We have requested copies of the reevaluation documentation itself, but we have not yet received this documentation. In our view, both of these sites need to be reviewed by the Keeper of the National Register. Given the high stakes surrounding these two eligibility determinations, and the potential risk of delay that could be caused by later nominations if voluntary referrals are not made, we strongly recommend that the Federal Highway Administration formally refer these issues to the Keeper and get them resolved. It is important to keep in mind that "[t]he passage of time, changing perceptions of significance, or incomplete prior evaluations may require the agency official to reevaluate properties previously determined eligible or ineligible." 36 C.F.R. § 800.4(c)(1).

> ***Nuttall House.*** It has now been a decade since the Nuttall House was reviewed by the Keeper of the National Register. The alterations from 1962 have now virtually reached the fifty-year point. As a result, the alterations are no longer required to meet a standard of "exceptional importance." The SHPO's original concurrence in a determination of non-eligibility relied heavily on the fact that the alterations were not yet fifty years old. (*See* letter from David Morgan, SHPO, to David Waldner, KYTC (June 18, 2001).) The rationales offered on Page 78b of the workbook—that "there are better examples of intact American Foursquare houses" and "it is difficult for the average individual to discern the original 1923 structure from the 1962 additions"—are not persuasive or conclusive reasons for determining that the house is not eligible under Criterion C, now that the fifty-year mark has been attained.
>
> More importantly, the Nuttall House has never been adequately evaluated under Criterion B, for its association with W.L. Lyons. (Instead, the prior evaluation under Criterion B focused exclusively on Samuel Miller Nuttall.) Lyons was the son of Henry J. Lyons, who founded one of the nation's oldest investment firms, dating back to 1854 in Louisville. W.L. Lyons bought the Nuttall House in 1961 and he was the one who converted the single–story porches into two-story wings. It was also during Lyons' tenure as the owner of the house that his investment firm merged with J.J.B. Hilliard & Son to become the current Hilliard Lyons firm. W.L. Lyons clearly played a much more significant role in the history of Louisville than Mr. Nuttall. Both of

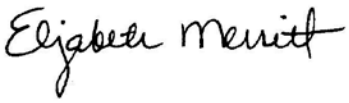
these new issues (the now-50-years-old alterations, and the significance of Mr. Lyons) need to be reevaluated by the Keeper of the National Register.

North Field of Belleview. The north field of Belleview has not been evaluated by the Keeper of the National Register herself, and it should be, in order to resolve the eligibility dispute conclusively. This field was historically associated with Rosewell, which has not been adequately addressed, but the field was purchased by the owner of Belleview in 1964. However, its historical use for agriculture and pasture land has never changed, despite its change in ownership. Changes in ownership should not negate the National Register eligibility of a property if the use and character of the property do not change. Furthermore, the summary of the reevaluation on Page 80b of the workbook acknowledges that the Jefferson County Survey Update recommends expanding the period of significance for the agricultural context in Jefferson County to 1970. The attempted response—that the period of significance for Belleview should remain fixed as ending at 1930 because that's what the National Register documentation says—is unpersuasive, and fails to address the mandate that "[t]he passage of time, changing perceptions of significance, or incomplete prior evaluations may require the agency official to reevaluate properties previously determined eligible or ineligible." 36 C.F.R. § 800.4(c)(1).

While the Section 106 regulations do give the agency discretion as to whether or not eligibility issues should be referred to the Keeper, *id*. § 800.4(c)(2), we think the better practice in a complex and controversial such as this, is to refer such issues to the Keeper for a definitive resolution early in the Section 106 process—and to do so publicly rather than secretly. Avoiding a referral would incur the risk that these issues will be raised later through a nomination, at a time when they have the potential to cause substantial delays.[5]

Thank you again for the opportunity to comment as a consulting party under Section 106. We look forward to further consultation in an effort to resolve these issues, in addition to the issues raised in our earlier comment letters dated July 15 and August 31, 2011.

Sincerely,



Elizabeth S. Merritt
Deputy General Counsel

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[5] *E.g., Corridor H Alternatives v. Slater*, 166 F.3d 368 (D.C. Cir. 1999) (historic districts were later determined eligible for the National Register long after completion of Section 106, requiring major realignment of the highway).

cc: Mary Ann Naber, Federal Preservation Officer, FHWA
Jose Sepulveda, KY-Division Administrator, FHWA
Robert Tally, IN-Division Administrator, FHWA
Janice Osadczuk, FHWA, IN-Division
Carol Legard, ACHP
Charlene Vaughn, ACHP
Reid Nelson, ACHP
Craig Potts, Kentucky Heritage Council

SECTION 106 COMMENT FORM

Louisville Southern Indiana Ohio River Bridges (LSIORB) Project
Section 106 Consultation Meeting
Crowne Plaza Hotel
Louisville, Kentucky
Thursday, September 29, 2011
1:00 p.m. - 5:00 p.m.

Please return this form before leaving the meeting or by mail to the address below by October 14, 2011.

Your name (optional): Steven Kersey **Date:** October 3, 2011

Representing what organization (if any): The Phoenix Hill Neighborhood Association

Address/City/State/Zip: 839 East Gray Street, Louisville, KY 40204

Phone/Email (optional): skersey@kerseyandkersey.com

Dear Sir/Madam:

My comments center on the traffic modeling and assessment of adverse effects to the Phoenix Hill Neighborhood in east downtown associated with the eventuality of tolling on the new downtown bridge. It seems that the modeling is not sufficiently considering the cross-neighborhood traffic that will occur as a result of tolling on the new downtown bridge. There can be not doubt that traffic normally entering the interstate system on Story/Mellwood, Grinstead or even Cannons Lane, will travel through Phoenix Hill from east to west, cross the river at the Clark Memorial Bridge (Second Street) and enter the interstate system on the north shore in order to avoid the tolling. The question is: what is the predictable volume of this traffic and will it change over time? Since it is only north-bound traffic that will be motivated in this way, there should be strong empirical data available to assist in this prediction. The mapping of the Area of Potential Effects presented does not demonstrate <u>any</u> substantitive change in this area. We question those results and request further evidence to support this conclusion . The neighborhoods east of Phoenix Hill have a higher population density than those of Clarksville and New Albany, where additional adverse effects are demonstrated in the mapping.

Please send your written comments to: Ms. Janice Osadczuk, Engineering Services Team Leader, Federal Highway Administration – Indiana Division, Room 254 – Federal Office Building, 575 North Pennsylvania Street, Indianapolis IN 46204

Project information is also available at http://www.kyinbridges.com.

PRESERVATION
Louisville

14 October 2011

Janice Osadczuk
Engineering Services Team Leader
Federal Highway Administration
575 North Pennsylvania Street, Room 254
Indianapolis, Indiana 46204

Preservation Louisville, Inc. appreciates the opportunity to be a consulting party on the ORBP and would like to thank you for the care and detail that was taken in preparing the Section 106 Identification Workbook. Although Preservation Louisville is a new consulting party in the C106 process with limited time to digest the large amount of documentation provided, Preservation Louisville has some comments and concerns that we would like for you to consider.

- The first concern is regarding the 100 block of West Main Street – Whiskey Row Historic District. In 2010, the 100 block of West Main was added to the National Register of historic places as a district.
    - In 2010, seven buildings on the north side of the 100 block of West Main were designated local landmarks, but it is not just these buildings that are of importance on the block and certainly the entire district should be recognized in your document as significant (workbook pages 236, 237, 239, 241, 244, 249, & 251).

- Preservation Louisville is concerned about the potential impact and consequences of excluding portions of National Register historic districts from the Area of Potential Effect. Our concern is that if in the future a negative impact occurs in a National Register historic district where only a portion of the district was considered for the APE this might yield the district no longer eligible for the National Register of Historic Places.

- Preservation Louisville is concerned about certain areas in the downtown Central Business district that were not included in the Area of Potential Effect and asks that further data is provided that analyzes the traffic patterns and the economic impact on the paths of entry to I64, I65 and the 2nd Street Bridge. Preservation Louisville would also like the following properties in downtown to be considered as eligible and included in the APE.
    - 200 West Chestnut Street
    - 135 West Muhammad Ali Boulevard

PRESERVATION
Louisville

- Preservation Louisville supports the Butchertown Neighborhood Association in asking that the 1600 block of Story Ave. be included in the Area of Potential Effect.

- Preservation Louisville would like to see the data and complete documentation in regards to West Louisville and most specifically the Portland neighborhood. Portland, which borders 1-64, currently holds the largest amount of Historic Shotgun houses in the City (Louisville Metro along with New Orleans have the largest inventories of Shotgun houses in the nation) and this neighborhood is also the location of the U.S. Marine Hospital- a National Landmark, a local Landmark and part of the National Register of Historic Places. Preservation Louisville would ask that in addition to providing the complete data set concerning this area to the consulting parties, that additional research and data be collected on some of the main streets and intersections in West Louisville. Several streets such as 22nd St., 21st St. Portland Ave., Bank St. and portions of Main St., Market St. and Broadway are among some of the places Preservation Louisville would ask for further documentation to be provided.[1]

- Preservation Louisville would ask that the property known as the Nuttall House be re-evaluated for the National Register of Historic Places under Criterion B: Association with Persons significant to the past. This property was owned by W.L Lyons a significant figure in our financial history, whose company we now call Hilliard Lyons.

Preservation Louisville would like to thank you again for this opportunity to comment on the ORBP Identification Notebook, and also thank you for the diligence taken in its preparation and respect for our historic assets.

Sincerely,

Marianne P. Zickuhr

Marianne P. Zickuhr
Executive Director
Preservation Louisville, Inc.

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[1] 36 CFR 800.11(a)
"(a) Adequacy of documentation. The agency official shall ensure that a determination, finding, or agreement under the procedures in this subpart is supported by sufficient documentation to enable any reviewing parties to understand its basis. The agency official shall provide such documentation to the extent permitted by law and within available funds."

RIVER FIELDS

October 17, 2011

Ms. Janice Osadczuk
Engineering Service Team Leader
Federal Highway Administration Indiana Division
Room 254, Federal Office Building
575 North Pennsylvania Street
Indianapolis, Indiana 46204

Mr. Jeff Vlach
Environmental Commitments Manager
Community Transportation Solutions -
General Engineering Consultant
8126 Castleton Road
Indianapolis, Indiana 46250

Re: Comments on Section 106 Identification the Draft Supplemental Environmental Impact Study: Louisville/Southern Indiana Ohio River Bridges Project.

Dear Ms. Osadczuk and Mr. Vlach:

Below is the River Fields response to the Section 106 Identification of Historic Resources and Area of Potential Effect (APE) For the Louisville/Southern Indiana Ohio River Bridges Project. We appreciate the opportunity to comment on this important step in the 106 processes. Thank you for your attention to our comments and concerns, which are responses both to the 106 workbook and the information, shared in the recent Section106 meeting on September 29, 2011.

Inadequacy of documentation; a serious concern shared by Consulting Parties:

The summary of many of our concerns is that the information shared with the consulting parties concerning the areas of possible traffic diversion due to tolls is abbreviated and incomplete in terms of the needs of consulting parties. Tab 3 in the workbook is a good introduction to and outline of the methodology for analysis of traffic diversion. The explanation is clear and well written. However, that section abruptly stops short of taking

It is universally understood that the DSEIS and 106 Process are on a very fast track with most ambitious deadlines. In consideration of that fact, River Fields suggests that providing earlier and more detailed documentation to the consulting parties would speed up the consultation process.

During the September 29, 2011 Section 106 meeting a number of consulting parties asked site-specific questions and were given a summary response with the inference that such-site specific evaluations exist. If, in fact, this analysis does exist, it should be shared with the community representatives who are asked to comment on the decisions that are made on the basis of that analysis. This point was made by five or six consulting parties at the most recent meeting. And despite the chorus of unanswered questions by groups across the bi-state region, those of us who independently requested more detailed traffic data did not leave the meeting with the information needed to comment on the extended APE decisions. Nor did we receive the information in the two weeks since the meeting. These concerns were repeated and it is River Fields' position that they were also not adequately documented in the minutes of the meeting recently circulated.

According to 36 CFR 800.11(a):

> "(a) *Adequacy of documentation. The agency official shall ensure that a determination, finding, or agreement under the procedures in this subpart is supported by sufficient documentation to enable any reviewing parties to understand its basis. The agency official shall provide such documentation to the extent permitted by law and within available funds."*

If detailed traffic information exists, it should be shared with all consulting parties. The absence of such information could lead some to wonder if the information does exist or if the decisions about potential traffic diversion were actually made without such data.

Evaluation of All Alternatives

River Fields concurs with the position taken by the National Trust for Historic Preservation that all alternatives to be evaluated in the original FEIS must be included in the SEIS, and must be also evaluated in the Section 106 Process. This would mean that the traffic diversion impact for the single bridges alternatives, especially the construction of the Eastern bridge only, must be a part of the consultation. We are concerned that the consulting parties have not received this information.

Area of Potential Effects

River Fields appreciates the meticulous background documentation of the important and multiple historic resources that are outlined in this document for New Albany and Jeffersonville. The proposed APE extensions in Indiana are well presented and important for the preservation and appropriate mitigation of those historic cities. The level of identification in New Albany is a particularly good model.

However, it is River Fields' position that the boundary lines of some areas of the APE appear arbitrary and inconsistent. There are a number of exclusions of portions of National Register districts that appear without a rational explanation within the workbook. We request clearer and site-specific rationales explaining the fact-based justification for these districts being cut off and out of the APE. Again, it is not possible for the consulting parties to make meaningful comments on the APE without a rational explanation from the consultants concerning their thought process in making these exclusions. Some, but not all, of these examples are provided below:

Complete exclusion of West Louisville from significant traffic impacts: Of great concern to River Fields is the omission of all of West Louisville from any impact of the Bridges Project and the addition of tolling. This is our most global criticism of the APE expansion, that West Louisville is not included.

As a member of the Regional Advisory Committee (RAC), I am well aware that much discussion took place at the last **and only meeting** of that group, in June, 2011. At that time River Fields and leaders and citizens of West Louisville asked for the traffic data and follow-up information to be presented to the RAC. The transportation officials leading the meeting made a commitment to follow-up on that important issue but to our knowledge have not done so. The next RAC meeting that was discussed has never been scheduled. Such actions indicate to River Fields and others that those commitments were not genuine, nor meaningful in the spirit of NEPA.

Now we are told in the Section 106 meeting that there is insignificant traffic diversion through West Louisville and Portland to warrant including these areas within the Extended APE. This statement was made without any back-up documentation to support the conclusion that there will be no significant impact along the city streets. Thus the justification is given that these historic communities on the Kentucky side are omitted from the APE, while an equal portion of the historic cities parallel in Indiana are included in the APE. The consulting parties have a need, and a right under 36 CFR 800.11(a), to review the traffic data that is the basis of the decision to exclude West Louisville from the Extended APE for traffic impacts due to traffic diversion to the Sherman Minton Bridge. The potential impact to the West Louisville neighborhoods and Portland must be re-evaluated with meaningful consultation with the consulting parties.

It is very possible that this traffic diversion will increase the vibration, noise and light already experienced by the West Louisville historic neighborhoods. If a careful evaluation does not take place, once again the needs of the diverse population of that part of the city will be ignored, while more well-heeled neighborhoods receive agencies' attention. Inattention to this area is ill advised and a risk management question for the Project leaders.

Complete exclusion of West Louisville from urban disinvestment and economic impacts due to expansion of urban sprawl: River Fields, some elected officials and the National

Trust for Historic Preservation have repeatedly requested during the original NEPA process and the last Section 106 Process for an accurate review, evaluation and report on the clear potential for disproportionate economic disinvestment from the historic neighborhoods of West Louisville. This urban disinvestment is the reasonably foreseeable result of the sprawl development that will be created by the proposed Eastern Bridge in eastern Jefferson and Clark Counties and western Oldham County. We are re-submitting the research of economist David Rusk, "The Impact of Urban Sprawl on African American Home Values and Assessed valuation of Property in the Urban Core" (February 13, 2002). The potential for adverse cumulative impacts is clear, and in fact was also reported several times in studies by the Brookings Institution. Avoidance of this reality is a disservice to both the citizens who live and own homes in that area and ignores the responsibilities of agencies under federal law, to act with special caution concerning economically disadvantaged historic neighborhoods. This is a subject that must not be further dismissed in the consultation.

Omission of East Main and East Market areas from Extended APE: The current and expanded APE in the downtown Louisville area includes the Butchertown, Phoenix Hill and West Main Street districts, which River Fields wholly supports. However, the expanded APE and the current APE wrap around a number of city blocks in the East Market and East Main neighborhoods and omit these blocks completely from inclusion in the APE. Without the slightest explanation in the workbook, and a superficial explanation at the Section 106 meeting on September 29, 2011, there is no technical or specific documentation provided. The consulting parties were told that the engineering data indicated there would be insignificant impact from traffic diversion. That is simply counter-intuitive and contrary to even basic observation of travel behavior in the city at this time. The closing of the Sherman Minton Bridge and the resulting heavy peak hour traffic downtown is easily observable in the East Main and Market districts. The heavy east-west commuting public is depending heavily on that portion of the street grid to avoid the complete gridlock around the Clark Bridge.

The consulting parties have a right and a need to know and therefore, understand the traffic data that purportedly demonstrates there will be no traffic impact from potential diversion. In reference to 36 CFR 800.11(a) River Fields requests that the traffic data upon which this decision is said to have been made, be shared with all of the consulting parties and discussed.

Exclusion of Louisville Streets approaching the Sherman Minton Bridge: In a related question, the APE does not include the streets that lead up to I-64 west, which is the main interstate that local commuters or travelers will use to avoid paying a toll if that is their goal. These incoming and outgoing streets include, but are not limited to Jefferson Street for evening traffic, and Market, Liberty and Chestnut Streets for morning traffic. It is simple common sense that these streets will have increased local traffic as an increased number of drivers work to avoid paying a toll. In reference to 36 CFR 800.11(a), River Fields requests

that the traffic data upon which this decision is said to have been made be shared with all of the consulting parties and discussed.

Butchertown request: The APE also does not include the 1600 block of Story Avenue and Frankfort Avenue in the Butchertown area. River Fields supports the request by the Butchertown Neighborhood Association that these streets be included in the APE.

Omission of the James Taylor Subdivision Historic District: The James Taylor Subdivision Historic District is a very important African American resource in Metro Louisville and the region, and is almost completely carved out from the APE. In reference to 36 CFR 800.11(a), River Fields requests the specific rationale for omitting this important African American historic district.

Omission of southwestern portion of the Country Estates of River Road: Additionally, the APE for the Eastern Bridge inexplicably leaves out a tiny corner of the southwest portion of the Country Estates of River Road District. Again, there is no obvious reason for this exclusion, nor is there any explanation for such. Please provide to all consulting parties for discussion.

Partial omissions of other districts: Other districts which are only partially included in the APE include the River Hill/Stonebridge historic district and the Upper River Road historic district. Exclusion of portions of these districts is unexplained. Please provide.

Special consideration is required for National Historic Landmarks and highly significant, fragile resources: In light of the size of this project and the amount of traffic to be managed, River Fields suggests that several National Historic Landmarks located just outside the proposed APE should be included within the APE, because of their exceptional importance, and because the potential for impact is more critical. In reference to National Historic Landmarks, Section 110(f) of the National Historic Preservation Act requires that:

> *"(f) Prior to the approval of any Federal undertaking which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking."*

Such resources should include any National Historic Landmark's (NHLs) potentially impacted. Because the Ohio River Corridor is a cultural landscape rich in centuries of American history, it has more NHLs than any other portion of the region. There are four NHLs in the corridor:

The Louisville Water Tower: This Landmark is included in the APE, but not identified as an NHL.

The Belle of Louisville: This Landmark is included in the APE, but not identified as an NHL.

Locust Grove National Historic Landmark: Locust Grove is a National Historic Landmark on 55 acres of the original 694-acre farm established by William and Lucy Clark Croghan in 1790. William Croghan was the brother-in-law and surveying partner of George Rogers Clark, founder of Louisville and Revolutionary War hero. George Rogers Clark spent the last nine years of his life at Locust Grove, from 1809 until his death in 1818. Locust Grove also hosted three U.S. Presidents, Monroe, Jackson and Taylor, and was a stopping point for famed explorers Meriwether Lewis and William Clark upon their return from their expedition to the Pacific. River Fields suggests that it is important to include Locust Grove, as there will be traffic diversion onto I-71 due to the tolling of the Eastern Bridge. The impact of this increased traffic on I-71, which is proximate to the National Historic Landmark of Locust Grove should be studied and reported to the Consulting Parties for meaningful consultation.

The Marine Hospital National Historic Landmark: The Marine Hospital, a National Historic Landmark, is directly contiguous to I-64 between downtown Louisville and the Sherman Minton Bridge. The construction of I-64 has certainly already compromised the Landmark's context, and any additional traffic could potentially further compromise the structure. At a minimum an evaluation should take place and be shared with the consulting parties. The Hospital was designed by Robert Mills (1781-1855) who was the first native-born architect to be trained in America. Born in Charleston, SC., Mills was educated at the College of Charleston and then studied architecture under James Hoban, the architect of the White House. Thomas Jefferson counseled the young man and provided him with access to his great architectural library. In 1808, he began working with Benjamin Latrobe, who impressed upon Mills his devotion to classic Greek design, principles of professional practice and science-based engineering. In 1830, he was appointed by President Andrew Jackson to the newly created position of "Architect and Engineer" to the Federal Government. He maintained this position until his death in 1855. During his tenure he designed ten marine hospitals for the government. In 1837 he prepared two different designs. The larger building, to house and care for 100 boatmen, was selected for this site in Louisville. A smaller version, housing fifty patients, was built downriver in Paducah, Kentucky. Of the ten inland marine hospitals designed by Robert Mills, the Louisville facility is the only building still standing.

Additional highly significant and fragile resources:

Wolf Pen Branch Mill Farm: River Fields also requests that the eastern APE be broadened to include this farm, and especially the most historically significant resources on the farm. A careful evaluation is needed of the potential impacts of vibration and blasting on the several very significant and fragile sites within that property. The property is a mid-nineteenth century farm. It includes the Wolf Pen Branch Mill, which was listed on the

National Register of Historic places in 1978. Historic structures on the farm include the gatehouse (c. 1900), the millpond (c. 1830), the millpond dam (c. 1830), the mill (c. 1875), and the miller's house (c. 1875 and c. 1930). Of particular concern are the fragile stone resources of the Mill and the dam each of which were constructed and sit directly on the limestone streambed. Even minor vibration from blasting could potentially harm these irreplaceable structures.

The entire farm is preserved forever by the landowner in a conservation easement co-held by the Kentucky Heritage Council and River Fields. At the landowner's request, she is bound by the easement to keep the mill, the mill dam and the miller's cottage in repair and maintenance according to the Secretary of the Interior's Standards for Historic Preservation. Especially in light of the engineering changes that are recommended for the Kentucky approach to the tunnel and the fact that the road bed will be significantly higher, there is no question that vibration and possible blasting could now potentially impact these fragile structures. At a minimum, such a property deserves monitoring and evaluation, especially during the period of blasting, if the Eastern Bridge is constructed.

Eligibility issues:

Requested review of eligibility decisions:

- **Nuttall House (W.L. Lyons – Criterion B)**
  - This property needs to be reviewed under Criterion B for its connection to W.L. Lyons of the major southern investment company, J.J.B. Hilliard and Lyons, which has a long and distinguished history. Hilliard Lyons is one the nation's oldest investment firms. In 1854, Quigley and Lyons was founded in the booming Ohio River trade center of Louisville. Later, when the partnership was dissolved, Henry J. Lyons decided to continue the business on his own. His firm, Henry J. Lyons & Co., began to thrive and in 1878, it bought a seat on the New York Stock Exchange. When Lyons died, his son took over, and the firm became W.L. Lyons & Company. Meanwhile, elsewhere in Louisville, John James Byron Hilliard had joined two other businessmen to found A.D. Hunt & Company in 1872. The private bank accepted deposits and dealt in real estate mortgages, railroad bonds, the gold trade and investment loans. This firm, which established a reputation for exceptional service, changed its name to J.J.B. Hilliard and, in 1893, to J.J.B. Hilliard & Son. J.J.B. Hilliard & Son bought a seat on the New York Stock Exchange in 1922, and by the midpoint of the century it had become the dominant investment firm in the region. In 1965, J.J.B. Hilliard & Son and W.L. Lyons and Company combined to become J.J.B. Hilliard, W.L. Lyons. The owner of the Nuttall House was Mr. W. L. Lyons and his wife Helena Caperton, sister of Mrs. G. Barry Bingham, the owner and editor of the

Louisville Courier Journal until it was sold in 1986. River Fields suggests that evaluation of this home under Criterion B should be carefully researched.

- **North Field of Belleview**
  - River Fields continues to object to the decision that the north field, now a part of Belleview, is not eligible for the National Register. There is some ambiguity as to whether the property was, in fact, in the original Belleview nomination. It is River Fields' position that the intent of the nominators was to include the north field. This issue has never been reviewed by the Keeper of the National Register. Furthermore, the field is still a very important, uninterrupted part of the Rosewell view-shed. And the continued rural, agricultural land use supports eligibility from a cultural landscape perspective, in light of the National Park Service guidance and policies on cultural landscapes. From a professional cultural landscape perspective, this field must be considered part of the shared rural landscape of both properties.

  - Additionally, it has been over 50 years since the north field was acquired by the owner of Belleview. The property land use is still agricultural and it enhances the vernacular, rural landscape integrity. The field is still a very important, uninterrupted part of the Belleview view-shed and now as an operating working farm. There is really no excuse for the decision made in the workbook that this property is not eligible. This issue must be must resolved with objectivity.

- **Mason Home, 6307 Wolf Pen Branch Road:** This bungalow style home was owned by Theresa Hobson Mason. Mrs. Mason was a major landowner in the Harrods Creek area and in fact, sold the land for the current Shadow Wood Subdivision. This home is in excellent repair and is similar to a number of the well-documented and well-preserved bungalows in the New Albany area. The map in the workbook is so small that it is difficult to ascertain whether this property is within the APE. Please clarify. If such bungalows are listed as eligible in other part of the project, this also should be listed as eligible. If not, River Fields requests that the evaluation be shared with the consulting parties.

<u>Unmentioned and Potentially Eligible Properties</u>

The Henning Hilliard House, 4006 Upper River Road: This property is contiguous to the Country Estates of River Road and to the Hilliard home in the Country Estates of River Road (CERR), also known as the Chrysler House. This second generation home was built in 1950. The landscape and the setting possibly designed by Anne Bruce Haldeman has only matured. This home can be considered under Criteria B and C due to the fact that it was designed by Mr. Reid Henry of Louis and Henry, a distinguished architectural firm in Louisville. Additionally, this site is historically connected to the CERR and could be

considered as an eligible boundary expansion as a classic second-generation home of the Hilliard family. The owner of this home was the grandson of Isaac Hilliard who purchased one of the early gentlemen farms in the CERR. The Hilliard family was one of the two partners in Hilliard Lyons, one the nation's oldest investment firms. (See information under Nuttall House above). Since the FEIS, and earlier Section 106 Process, this home has possibly become eligible for the National Register of Historic Places and should be evaluated. Again, River Fields suggests evaluation under Criteria B and Criteria C.

The Thomas Henry and Amelia Brown Payne house, 5025 Nitta Yuma: This site is situated within both the CERR and the Nitta Yuma National Register Districts. However, it is not listed only as contributing at the time of the nominations as it was not yet 50 years old. Now the site is 61 years old. An assessment should take place as to whether this has become eligible in its own right, due to the passage of time. This home was designed and built on the site of the original George Garvin Brown and Amelia Owsley Brown summer home in Nitta Yuma–one of the three homes that began the Country Estate era in Nitta Yuma. Amelia Owsley was the granddaughter of 19th century Kentucky Governor, William Owsley. George Garvin Brown was the founder of Brown-Forman Corporation. After the original Brown home burned in 1947, due to lack of fire service, another home was designed for the Paynes, by notable local architect Frederic Morgan, and constructed in 1950. Mrs. Payne was the youngest daughter of George Garvin Brown and Amelia Owsley, and brother of Owsley Brown I, all citizens of historic note in Louisville. The home was intentionally built on the same driveway and site as the original George Garvin Brown summer home. The essential bones of the garden design by Anne Bruce Haldeman remain. There have been no major additions to the Frederick Morgan designed home since its construction. The structure and landscape are virtually untouched and the setting has only matured. It is a classic clapboard country cottage design and in keeping with second or third generation homes in Country Estates of River Road. The home remains in the ownership of a Brown family member.

Also Potentially Eligible:

- With consideration to the 1950s neighborhoods and subdivisions included in the New Albany and eastern alignment–especially The Woodhill Valley Subdivision – River Fields requests an evaluation of the cluster of ranch houses built in the 1950's along Upper River Road between Harrods Creek Bridge and Mayfair Avenue. This "reads" like a 20th Century Suburban Historic District.

- No explanation is given for the omission of Indian Hills or a portion of Indian Hills Subdivision as a potential historic district. In light of the fact that the former SHPO, David Morgan repeatedly stated he thought it was eligible, River Fields would request more information on this decision.

Corrections in the workbook:

- On page 72, the authors state that the largest property in the CERR is 40 acres. Please recheck this information and clarify. To our knowledge, the largest property is Shadybrook Farm, which is well over 40 acres. Several other sites are also over 40 acres.

- On page 66, it is states in the current recommendation that Woodhill Valley Subdivision is not eligible. However, on page 71, the subdivision is listed as eligible. Please clarify.

- On page 64, the Mockingbird Valley Subdivision is listed with Indian Hills. First, it is unclear what this subdivision is? And second, an area called Mockingbird Valley was listed on the National Register some years ago as an historic district. Please recheck and clarify this statement. Whether the author agrees, or not, the Mockingbird Valley area is a National Register District.

River Fields realizes that the project is on a very ambitious schedule and that, *in spite of the regulations, which provide 30 days for comments from consulting parties,* consulting parties have been instructed to respond in 15 days from the last meeting. We have made every effort to comply with that demand. However, in light of the complexity of this project and the multitude of historic properties, we request that the required 30-day period for comment be instituted in the upcoming comment deadlines for Section 106 Process.

Again, River Fields thanks you for your careful consideration of our response. We look forward to additional meaningful consultation to resolve these concerns and questions.

Sincerely,

Meme Sweets Runyon
Executive Director

Attachment by mail: " The Impact of Urban Sprawl on African American Home Values and Assessed Valuation of Property in the Urban Core" by David Rusk, February 2, 2002

c: River Fields Board of Trustees
John Sacksteder, CTS

The Impact of Urban Sprawl on
African American Home Values
and Assessed Valuation of Property
in the Urban Core
By David Rusk
2/13/02

Background

The DEIS justifies the East End Bridge on the basis that it will provide "cross-river mobility" between two projected high-growth areas. "Much of eastern Jefferson County, Kentucky and southeastern Clark County, Indiana, is predicted to see moderate to high population and employment growth rates between 1990 and 2025.... These predictions are consistent with locally approved land use plans and proposed infrastructure improvements in those areas. Meanwhile, these two high growth areas, which are juxtaposed across the Ohio River, lack convenient cross-river transportation access, thereby hindering cross-river mobility...."

"Locally-approved land use plans," the DEIS further states, "support the population and employment growth predictions ... and indicate that the local jurisdictions anticipate and desire significant growth in both southeastern Clark and eastern Jefferson counties in the coming decades."[1]

Furthermore, even though local growth projections are predicated on construction of the East End Bridge, in the DEIS's official view, the East End Bridge will not add to the region's economic development but merely redistribute where the anticipated growth will occur. The DEIS says that with an East End Bridge's "10,370 jobs are projected to move by 2025 from Jefferson and Oldham Counties to Clark and Floyd Counties, representing a $342 million transference in salaries to southern Indiana."[2]

The East End Bridge does not promote urban sprawl, the DEIS states, because, without the East End Bridge, most of those jobs would end up in Oldham County – somewhat farther from the urban core than eastern Clark County (that is, if the bridge is built). That such job growth would otherwise occur in Oldham County's greenfields is based on the DEIS's convenient and facile (but factually unsubstantiated) assumption that the city of Louisville and central Jefferson

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[1] *P & N*, pp. 17-18.
[2] DEIS, pg. 5-28.

County are largely built out. In other words, without the East End Bridge, the bulk of the region's job growth will have to be located in suburban Oldham County of necessity because there will be no other land available to accommodate it. By the DEIS's reasoning, the East End Bridge actually retards rather than facilitates urban sprawl.

But what is urban sprawl? The most comprehensive recent review of research on urban sprawl was conducted by a panel of national experts convened by the Transportation Cooperative Research Program of the National Academy of Sciences. The panel's report, *The Costs of Sprawl – Revisited* (1998) listed 10 characteristics that commonly define urban sprawl:

1. unlimited outward extension of development,
2. low-density residential and commercial settlements,
3. leapfrog development,
4. fragmentation of powers over land use among many small localities,
5. dominance of transportation by private automobiles,
6. lack of centralized planning or control of land uses,
7. widespread strip commercial development,
8. great fiscal disparities among localities,
9. segregation of types of land use in different zones, and
10. reliance mainly on the trickle-down or filtering process to provide housing for low-income households.

"These traits have dominated American metropolitan growth for 50 years," the report comments. Indeed, they describe very accurately development patterns in the Louisville area over the last 50 years. And very clearly, the East End Bridge would enable continuation of these development patterns.

So how are we to assess the socioeconomic impact of the East End Bridge or, more broadly, of urban sprawl upon the region's core neighborhoods and, more specifically, on its African American community?

Assessing Socioeconomic Impact

The DEIS largely adopts an engineer's view of the area of impact of the East End Bridge. In other words, the DEIS focuses primarily on the areas that are physically affected by the construction of the bridge and the expanded highway network leading to and from it. These cover not only the actual lands that are dedicated to the bridge and highway network including historic and cultural properties, farmland, and natural habitats but also adjacent neighborhoods that may be impacted by air, water, noise, and visual pollution.

However, the DEIS applies a similarly narrow geographic view to analyzing socioeconomic impact. Moreover, in evaluating socioeconomic impact, the DEIS really looks at only one dimension: what will be the impact of the East End Bridge on location of future jobs and the potential changes in transportation access for residents of a limited number of neighborhoods.

In reality, such a growth-spurring public investment must be assessed not only in the context of the entire labor market but also in the context of the entire housing market, the entire commercial market – in short, in the context of the entire urbanized area.[3]

The past is prologue to the future. This paper will assess trends over the last thirty years of three key elements that are ignored totally by the DEIS: 1) what has happened to the size of the core area's housing supply; 2) what has happened to the value of those core area homes, and 3) what is the combined impact of shifts in the location of housing, stores and offices, and factories upon the property tax base of the core area.

Urban Sprawl in Greater Louisville

There has been one constant phenomenon in the Louisville area. Whether economic times are bad (the 1970s and 1980s) or good (the 1990s), the region's patterns of development have consumed a great deal of land to accommodate little or modest population growth. Though sprawl can be measured in many ways, one uniform measure is based on the Census Bureau definition of "urbanized areas."[4]

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[3] Because Louisville's urbanized area was totally contained within Jefferson, Clark, and Floyd counties in 1970, and comparable data from that year was not readily available for Bullitt, Oldham, Harrison, and Scott counties (that now are part of the Louisville metro area, this multi-decade analysis generally focuses on the former three counties.

[4] According to the Census Bureau, an "urbanized area" comprises one or more places ("central place") and the adjacent densely settled surrounding territory ("urban fringe") that together have a minimum of 50,000 persons. The urban fringe generally consists of contiguous territory having a density of at least 1,000 persons per square mile.

Urban Sprawl from 1970-90: As Table 1 shows, during the 1970s and 1980s, while the USA's urbanized population as a whole grew 23%, the Louisville area's urbanized population grew only 2%. During those two decades, with 23% population growth, the USA's urbanized areas expanded their land area by 51%. In other words, the typical urbanized area's development patterns consumed land at slightly over two times the rate of population growth. Despite minimal population growth (2%), however, the Louisville area's urbanized land grew by 34% – 17 times the rate of population growth.

The 246 urbanized areas identified in 1970 ranged in size from tiny Harlingen-San Benito TX (that barely qualified with 50,469 residents within 34 square miles) to the giant New York NY-Northern New Jersey urbanized area with 16,206,841 residents living within 2,425 square miles.

I have identified 34 urbanized areas that might be considered Louisville's "peers." In 1970, all had populations within a range of 50 percent (plus/or minus) of the Louisville region's 739,396 residents. Here again, among these 34 peer urbanized areas, development patterns consumed land (+43%) at more than twice the rate of population growth (+18%) between 1970 and 1990.

Finally, I have designated six central cities as the city of Louisville's "twins" (at least, in land use terms). These are Buffalo, Cincinnati, Norfolk, Richmond, Rochester, and Toledo. In 1970, all these cities fell within a range of 50 percent (plus/or minus) of the city of Louisville's 361,472 residents within its 60 square mile boundaries. Between 1970 and 1990, the populations of the entire urbanized areas embracing these six cities grew 12%, while their land areas expanded 50% – a four to one ratio.

In fact, out of the 34 peer areas, only Buffalo and Rochester consumed more land with minimal or negative population growth than the Louisville area.

Urban Sprawl from 1990 to 2000: Census 2000 has not yet released data on urbanized areas, so we cannot update the above data reliably. From Census 2000 population counts, I calculated how many previously lower-density census tracts passed through the 1,000-person per square mile threshold during the past decade, adding them to higher-density census tracts as of 1990. That yielded an estimate that, while the Louisville area's urbanized population grew by 6%, the amount of urbanized land grew 16%. However, since my calculation of the size of Louisville's urbanized area in 1990 was lower than the Census Bureau's official

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The urban fringe also includes denser areas that are not contiguous but linked within less than 1 ½ miles by land roads, or, if separated by water, by less than 5 miles of roads and bridges. Less dense "enclaves" are also included.

tabulation, my results can only be treated as a rough approximation (at best) of what the official data will reveal.

There are, however, other measures that can serve as indicators. Table 2 charts the distribution of population change by jurisdiction from 1990 to 2000. Overall, the Louisville metro area increased 8% in population, breaking out of its relative stagnation of the previous two decades but still well short of the 13% increase for the USA as a whole.

While the city of Louisville continued to lose population (-5%), the balance of Jefferson County absorbed over half (54%) of the region's net growth. Bullitt and Oldham counties accounted for major shares as well (18% and 17% of the region's population growth, respectively). All told (taking Louisville's losses into account) the Kentucky portions of the metro area accounted for almost three quarters (72%) of the region's net population growth.

Though the Indiana portion accounted for the remaining 28% of the region's growth, the rates of population growth were not particularly high by comparison with rapidly expanding areas elsewhere. Clark County (a 10% growth rate), Floyd County (10%), and rural Harrison (15%) and Scott (9%) counties all barely exceeded the regional population growth rate (8%). This suggests that the very absence of additional bridges to Indiana is helping to keep most growth on the Kentucky side of the Ohio River.

Though urban sprawl then can be seen largely as a Kentucky phenomenon at present, it is at least within the power of Kentucky legislators and local officials to contain it if they choose. New bridge crossings would accelerate southern Indiana's growth, transforming controlling the region's sprawl into a bi-state challenge – a task that only the Portland OR-Vancouver WA region has begun to achieve among the USA's three dozen multi-state metro areas.

Yet another indicator of development patterns is demonstrated by Table 3. Table 3 compares the growth of population in the Louisville area during the 1990s (8.1%) with the loss of farmland (-14.2%). In effect, once again, during the past decade, local development patterns were consuming farmland at about twice the rate of regional population growth.

Finally, on a statewide basis, the US Department of Agriculture's National Resources Inventory reports on the amount of "developed land" as contrasted with farmland, forest land, and other uses. Table 4 shows that during the 1990s, the amount of developed land increased 29.6% in the state of Kentucky as contrasted

with a 9.7% rate of population increase – a 3 to 1 land-to-population growth ratio. In effect, Kentucky's statewide development patterns were consuming more than an acre of land for each additional resident.

By all measures, urban sprawl continued unchecked in the Louisville area throughout the 1990s. Without changes in state laws regarding land use, changes in their implementation by local governments, and changes in major transportation and other infrastructure investment decisions that support constant outward expansion, urban sprawl will continue.

Homes Built/Homes Destroyed

Such high land growth-to-population growth ratios reflect both very low-density growth on the urban fringe and steady population loss in the urban core. And that was precisely what happened to the city of Louisville. From 1970 to 2000 the city lost 29% of its residents, dropping from 361,472 to 256,231 – below its population in 1930![5]

To a substantial degree, the degree of population loss such as Louisville has experienced can be attributed to falling household size. As Table 5 shows, average household size has become smaller across the Louisville metro area. Smaller families, more young single persons, elderly persons living longer in independent households – these are trends that have been reducing average household size across all more economically developed societies. Between 1970 and 2000, average household size declined by one-quarter in metro Louisville.

But population changes in different parts of the Louisville area have been very much a function of patterns of new construction in the regional housing market. From 1970 to 1990, 108,200 new housing units were built in a three-county area (Jefferson, Clark, and Floyd) – 88% outside of the city of Louisville. But only 64,535 net new households were formed.[6] Thus, there were 43,665, or 68%, more new housing units built than new households created to fill them.

New housing always sells (or rents), though not necessarily at the profit margins the investors hoped. But with so much "excess" housing on a slowly growing market, a lot of older housing is rendered economically obsolete – whatever its intrinsic condition, historic value, or other positive factors.

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[5] Much more severe population losses were recorded by Cleveland, Detroit, and St. Louis that lost more than 50% of their peak population.

[6] From 1970 to 2000, the city of Louisville lost 11,269, or over 9%, of its households.

Without buyers or renters, owners often must walk away. Many properties are taken over by the city for unpaid taxes. Other abandoned properties fall prey to arson or become so decrepit that they must be demolished by local authorities. Whatever the reasons, by 1990 almost 34,000 housing units had vanished, in effect, from the region's existing housing stock in 1970.[7] Two-thirds of the region's vanished houses were located in the city of Louisville, which lost over 10% of its housing stock.

Thoroughly documenting these same build-and-destroy patterns for the 1990s must await more data from Census 2000. However, Tables 6 and 7 track these trends in detail for the previous two decades.

Residential Socioeconomic Trends

Table 6 divides Jefferson County into sub-areas based on the Louisville area's residential racial patterns as of 1970. The 32 census tracts that had a majority of African American residents in 1970 were located entirely in Louisville's West End (see map 1). As a group, these West End tracts were 82% black in 1970; the percentage rose to 89% by 2000. These were also poor neighborhoods. The family poverty rate was already high (25%) in 1970, and rose much higher (38%) by 1990. However, there were actually fewer poor families there in 1990 (5,393) than in 1970 (5,934). The rapidly escalating poverty rate reflected the fact that over half of the West End's middle class families (some 9,200) had moved out.

Many undoubtedly moved into eight census tracts adjacent to the historic black ghetto. These tracts shifted rapidly from majority white (73% in 1970) to majority black (70% in 1990) neighborhoods. These were classic examples of "white flight." Though some new African American residents undoubtedly had higher incomes than departing whites, the number of poor families increased (from 891 to 1,418) and the poverty rate doubled (from 10% to 20%). I have characterized these census tracts as the West End Annex.

A third group of census tracts have also clearly been in racial transition but more slowly. These 16 tracts are located either south of the West End or southwest, extending into the city of Shively and parts of South Louisville/Jefferson County. With their African American populations having

[7] Other reasons why housing "vanishes" can include condemnation for new road and highway construction, airport expansion, park acquisition , private demolition for expansion of commercial facilities, and, occasionally, conversion of mobile home parks to stick-built subdivisions.

grown steadily during the previous three decades, these neighborhoods ranged from 30% to 53% black by 2000. During this transition the number of poor families more than doubled (from 2,091 in 1970 to 4,217 in 1990) as did the family poverty rate (9% to 20%). Most new African American residents, however, were renters, not homeowners. By 1990, the homeowner population was still 90% white/10% black. Undoubtedly, Shively/South Louisville had seen many low-cost apartments built in the post-war years – some by the city or county housing authority, some by non-profits, but most by for-profit developers of "market rate," but lower rent apartments.

These three categories of African American neighborhoods are highly contained in West Louisville and parts of South Louisville/Jefferson County. They cover only 48 square miles (less than 13%) of Jefferson County's 385 square miles. The rest of Jefferson County can be characterized as White Louisville/Jefferson County. It is notable for the very slow rate of racial integration that is occurring. Black residents of White Louisville/Jefferson County have increased from 1.6% to only 6.6% in 30 years. Once again, most new African American residents are renters. By 1990, blacks still constituted only 2% of all homeowners. And, since economic segregation is so closely aligned with racial segregation, changes in the poverty rates of these minimally integrated neighborhoods have been minor. In 1970, White Louisville/ Jefferson County's family poverty rate was 5.1%; by 1990, it was 5.8%.[8]

White Louisville/Jefferson County, however, can be (literally) sub-divided by when the preponderance of different neighborhoods' housing stock was built. Accordingly, I have divided White Louisville/Jefferson County into three sub-areas: Old White Louisville (pre-1950 areas), Inner Ring (1950s & 1960s areas) and "Sprawlsville" (1970s & 1980s areas).

Table 6 also summarizes socioeconomic trends in Clark and Floyd counties north of the river. Little change has occurred in Floyd County, including the city of New Albany (not shown) that dominates the county. Similarly, little has occurred in Clarksville in Clark County. However, the city of Jeffersonville has been growing steadily, especially by expanding into census tract 506 in remaining portions of Jefferson Township (northwest of Utica Township where the northern

[8] It will surprise many to learn that in metro Louisville KY-IN in 1990, there were almost *twice* as many poor white families (16,907) as poor black families (9,751). Even within Jefferson County, where 94% of the region's poor black families lived, poor white families (10,953) outnumbered poor black families (9,170). In metro Louisville as in most American metro areas, poor blacks were ghettoized; 81% of poor blacks lived in poverty-impacted census tracts in 1990. By contrast, 69% of poor whites lived in middle-class neighborhoods or in rural communities.

end of the East End Bridge would be located). Over the last three decades tract 506 has almost tripled in population (from 6,424 to 18,517), accounting for almost 60% of Clark County's total population growth. That new growth has been accompanied by considerable racial change as well; tract 506 has gone from 0.4% black in 1970 to 9.8% black in 2000 – again, accounting for 60% of the increase in Clark County's black residents.

By sharp contrast, the "rural" townships of eastern Clark County have hardly experienced any racial change whatsoever. These are the four census tracts in eastern Clark County at the northern end of the proposed East End Bridge. Between 1970 and 1990, there was substantial construction (5,529 new homes), adding 63% to the pre-1970 housing stock. A number of pre-1970 units also vanished (1,573, or 5%). (In such semi-rural settings, this often occurs when mobile home lots are converted to stick-built home sites.)

What was somewhat surprising was the absence of any racial change at all. In 1970, just 0.7% of homeowners were black; in 1990, the percentage was 0.6%. And change was imperceptible in the 1990s; the percentage of black residents in eastern Clark County nudged upward from 0.9% to 1.0%. In fact, in the past three decades, while eastern Clark County has added a net of 10,492 new residents, only 103 were African Americans.

Which is the more likely prospect if an East End Bridge greatly accelerates housing construction – growing integration as in tract 506 in Jeffersonville or continued racial exclusivity as in eastern Clark County's townships?

What Gets Built Where for Whose Benefit

Having traced socioeconomic trends in Table 6, the patterns of where new housing is built – and where it isn't – are explored in Table 7. Census 2000 has only released data on total number of housing units thus far. My analysis, therefore, focuses on the 1970-90 period. The key statistics in Table 7 are 1) the number of new housing units built during these two decades, particularly as expressed as the percentage addition to an area's housing stock in 1970 ("homes built"), and 2) the number of pre-1970 housing units that just disappeared from an area's inventory by 1990, also expressed as a percentage of 1970 housing stock.

Not surprisingly, almost by definition, the two oldest parts of town saw the least new construction. As late as 1990, some 61% of the West End's surviving housing stock had originally been built before 1950. Little new housing was built during these two decades – only 3,325 units (barely 3% of all new housing built in

the three-county region) which was equivalent to a 10% addition to the West End's existing housing stock as of 1970. Furthermore, since the West End was "the affordable housing side of town" (particularly for blacks), much of the new construction was subsidized housing for low-income families.

The housing stock of Old White Louisville was, if anything, even more venerable (as late as 1990, 77% of the housing had been originally built before 1950). And, as in the West End, little new was also built in Old White Louisville during the two decades – just 2,759 units (equivalent to only a 7% addition to the 1970 housing stock).

However, the dramatic difference was in how much older housing "vanished" from the two racially-distinct areas. (Remember: during these two decades, local homebuilders built 68% more new housing units regionally than new households were formed to fill them.)

By 1990, 9,982 older housing units had disappeared from the West End. Undoubtedly, many African American families, particularly middle-class families, were attracted to better housing opportunities opening up in better neighborhoods. (Some 9,200 middle class households – black and white – moved out.)

Undoubtedly, many of the West End's housing units were outdated, substandard structures, though, despite lacking modern kitchens and bathrooms, many still had great architectural appeal and historic charm. However, they were rendered unmarketable and economically valueless by the soft regional housing market and socially undesirable by the West End's rising poverty rate. Many were abandoned by their previous owners and ultimately burned or were torn down by city government. Yet they were once somebody's valuable asset. And the systematic devaluation of those assets had consequences both for wealth accumulation within the African American community and for the property tax base of the city of Louisville (as will be discussed below).

Old White Louisville lost proportionally far fewer older units – only 6,241, or 15% of its older housing stock. By contrast with the West End, Old White Louisville was a relatively low-poverty area (8% in 1970 rising to 10% by 1990). Many of the region's most historic and prestigious neighborhoods, like Highlands, centered on Bardstown Road, are located in Old White Louisville Despite being "old," they maintained their reputations as desirable places to live. The principal difference between these neighborhoods and the West End: race and poverty.

West End Annex and Shively/South Louisville (into which African Americans were moving) saw considerable new construction (27% additions to their 1970 housing stock). And new housing construction continued in Inner Ring areas that had been largely developed in the 1950s and 1960s. Only 7% of older homes vanished in the Inner Ring.

However, in what I have designated as "Sprawlsville," mushrooming new subdivisions more than doubled the 1970 housing stock (119% growth). Located in eastern and southeastern Jefferson County, these new neighborhoods were built exclusively for middle class families. Sprawlsville's ultra-low poverty rate (3%) was unchanged through two decades. Less than 2% of older housing "vanished," probably to make way for new sub-divisions and shipping centers.

Combined with greenfields developments in Floyd and Clark counties, Sprawlsville was where so much of the region's "excess" housing was built from 1970 to 1990. Sprawlsville, of course, was a success, but its success came at the expense of the West End. And relatively few African Americans moved into Sprawlsville in these two decades. By 1990, while almost one-third of Jefferson County's white residents lived in Sprawlsville, barely 8% of the county's African Americans called Sprawlsville "home."

In summary, what got built (a lot of "excess" housing) where (in Sprawlsville) for whose benefit (overwhelmingly middle-class white families) also served as an engine to help cause thousands of homes and apartments to disappear from the ever-more African American West End.

That's the Big Picture. How about the little picture? What happened to value of the average home that was typically a homeowner's most important financial asset? The next section examines the impact of these development trends on comparative home values.

The Economy, Sprawl, Segregation, and Home Values

In a world of steady inflation (whether rampant, as in the late 1970s, or modest, as in the 1990s), the nominal value ("sticker price") of almost everybody's home goes up. But how does the *real* value change – that is, the value adjusted for inflation?

I have found that three factors influence changes in the real value of housing within a regional housing market: the health of the local economy, the relative supply and demand for housing, and the impact of the "segregation tax."

The health of the regional economy has the largest impact. That stands to reason. If the rate of unemployment is low and incomes are rising, the price of housing (and hence its value) will be rising as well. If local economic times are bad (at least, by comparison with the national economy), changes in local housing prices/values will lag behind changes in national housing prices/values.

As Table 8 shows, over the last three decades metro Louisville's economic history divided into two distinct chapters: the 1970s and 1980s (bad times) and the 1990s (good times).

During the earlier decades, metro Louisville was hard hit by industrial transformation. Between 1973 and 1988, the region lost -26% of its industrial jobs (compared with only a -2% loss nationwide). The growth of local non-manufacturing employment (39% – not shown) lagged national growth (47%) as well. Overall, during that key 15-year span between the economic crisis of the OPEC oil embargo and the end of the "Bonfire of the Vanities" era, the greater Louisville job supply grew by only 21% compared to national job growth of 37%.

Home Values in Bad Times: In 1970, the median value of owner-occupied homes in the three-county metro Louisville was $15,000. By 1990, the median value had risen to $56,000 (in a seven-county region). Had homes almost quadrupled in real value? Of course not. The national rate of inflation was 237% during these two decades. Thus, the median value of homes in metro Louisville, in real terms (that is, adjusted for inflation) had increased only 11%. Within Jefferson County, the increase was 9%, and within the city of Louisville, just 5%.

But nationally, the median value of homes increased 36% in real terms. The local lag in rising home values was primarily due to metro Louisville's sub-par economic performance during these two decades.

That 11% real increase was not experienced uniformly across the region. Table 9 shows the relative changes in home values by the same sub-areas that were discussed above in relation to Tables 6 and 7.

First, three areas of the region substantially outperformed the regional average – Sprawlsville, suburban Floyd County (outside the city of New Albany), and Old White Louisville. From 1970-90, Sprawlsville and suburban Floyd County (not shown) had major housing booms, with levels of new construction equivalent to 119% and 113% of their pre-1970 housing stock, respectively. New housing – often bigger, with modern bathrooms and kitchens, and two-car garages – typically sells for more than older housing.

But the excellent performance of Old White Louisville (a 25% real increase) may also prove the reverse – the desirability of older, often historic housing in close-in, "good" neighborhoods. The prices of historic homes were probably bid up by a new generation of re-gentrifiers, and a substantial portion of the 2,759 new homes were probably aimed toward the upper-end of the market – young, professional families and "empty nesters" who did not want to live in Sprawlsville.

But what really leaps off the page of table 9 is that *homeowners in the West End, West End Annex, and Shively/South Louisville actually lost money on their homes.* Inflation-adjusted values dropped -19%, -16%, and -7%, respectively. In fact, African American homeowners as a whole actually lost value during the two decades – minus 2% metro-wide and minus 15% within the city.

What's going on here? The disparate impact on black homeowners occurs because of the phenomenon that I have labeled the black "segregation tax."[9] In highly segregated regions like Louisville, the great majority of black homeowners own their homes in majority black neighborhoods. Despite lessening anti-black prejudice among whites, most white homebuyers still won't consider homes in majority black neighborhoods. With the great majority of homebuyers (91% white in metro Louisville) not bidding on homes in majority black neighborhoods, price competition is greatly reduced, and such homes typically appreciate very slowly in value (if at all).

The Louisville area's housing market was – and, despite improvement, remains – highly segregated. On a segregation index scale of 0 to 100 (with 100 equaling total apartheid), metro Louisville's index was 81 in 1970. By 1990, it had improved to 69 – still very high.

In 1990, the average black homeowner in metro Louisville had an income of $30,778 and owned a home worth $40,600. In other words, for every dollar of income, the average black homeowner received $1.32 worth of house.

In 1990, as would be expected, the average white homeowner had a higher income ($42,342) and owned a higher valued house ($71,800) – a lot higher valued house. In effect, for every dollar of income, the average white homeowner received $1.70 worth of house.

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[9] See the author's "The 'Segregation Tax': the Cost of Racial Segregation to Black Homeowners," issued by the Center on Urban and Metropolitan Policy of the Brookings Institution (October 2001).

In summary, standardized for a dollar's income, the average black owner received only 78% of the home value of the average white owner or, using the reciprocal, the black homeowner received 22% less – a 22% "segregation tax."

Looking at Louisville's sub-areas, one might argue that the West End was a particularly burdened community. The West End began this 20-year period with a great deal of old, substandard housing, a high poverty rate (25%), and little prospect for much new, market-rate housing being built in the "affordable housing side of town." (Most of the 3,325 units built were subsidized housing.) One might be tempted to discount the role of the "segregation tax" for the West End.

But compare trends in home values between West End Annex and Shively/South Louisville, on the one hand, and Old White Louisville, on the other. West End Annex and Shively/South Louisville began with a newer housing supply than Old White Louisville. (As of 1990, only 30% of the former's housing supply had been built before 1950 compared with 77% of the latter's.) In 1970, all three areas had equivalent median home values (West End Annex: $12,425; Old White Louisville: $12,587; Shively/South Louisville: $14,346). Old White Louisville would see little new construction, adding only 7% to its pre-1970 housing stock. Both West End Annex and Shively/South Louisville added 27%.

Yet home values lost ground in West End Annex (-16%) and Shively/South Louisville (-7%) while Old White Louisville was a top=performer regionally (+25%). The difference was race – and rising neighborhood poverty levels associated with an influx of black renters. Old White Louisville continued to be a prime area for white homebuyers. (There was *zero* change in the tiny proportion – 2% – of black homeowners.) By contrast, most white homebuyers shunned West End Annex, where homeownership went from 75% white to 64% black in two decades. Though there was much less racial changeover in homeownership in Shively/South Louisville (4% black to 10% black), the rising numbers of black renters (and of poor renters – black and white) discouraged white homebuyers.

Summing up, a weak economy (the most important factor), a soft housing market (much "excess" construction regionally if little in inner-city neighborhoods), and highly segregated housing markets combined to level over 15,000 housing units in black (or becoming black) neighborhoods and reduced the real value of the homes that remained standing at the end of the 1980s.

Home Values in Good Times: The 1990s tell a different story. Conclusively determining how different must await release of much more detailed housing and income data from Census 2000.

Metro Louisville's economy clearly revived, as Table 8 shows. Louisville was no boomtown. On two key indicators, growth in real per capita income (15%)[10] and civilian labor force growth (5.5%), the local economy barely came up to national averages. Overall population growth resumed (8%) for the decade, breaking out of the stagnation of the 1980s (-0.4%), but still well short of national population growth (13%). But, by comparison, the 1990s for metro Louisville were a lot better than the previous two decades.

The previous two decades saw a great imbalance between supply (108,200 new housing units built) and demand (64,535 net households formed). Though data are incomplete, that pattern persisted into the 1990s. In April 1998, the Census Bureau reported that, between 1990 and 1996, the 7-county region's cities, towns, and counties issued 38,839 building permits. Of course, building permits issued was not synonymous with new housing units built. Some permits lapse. Others were for commercial and industrial property. A portion would have been for renovating existing residences. But the lion's share of building permits issued must have been for new residential construction. And during an overlapping 7-year period (1990-97), the Census Bureau estimated, some 21,000 new households were formed. So new construction still must have exceeded new household formation by a substantial margin through the mid-1990s.

Table 10 analyzes relative growth in housing and housing units by the end of the decade. Though household growth in metro Louisville (12%) still lagged the USA average (15%), expansion of the net housing supply locally (12%) almost matched the national rate (13%).

This end of the decade snapshot seems to show a regional housing market with supply and demand in balance with virtually no change in the vacancy rate. What happened to my argument about the imbalance between housing production and net household formation?

What is missing from Table 10 is how many existing housing units at the beginning of the decade "vanished" during the intervening 10 years. That cannot be readily ascertained until Census 2000 has released fuller data. (I did not undertake the time-consuming alternative of tabulating local government's demolition records.)

[10] For Jefferson County only – the only local area reported by the Census Bureau's Supplementary Survey.

Three key observations about Table 10. First, the city of Louisville lost another 1,100 housing units net during the 1990s to which can be added one additional lost home for every new home built within the city limits.

Second, overall, the balance of Jefferson County outside the city still accounted for almost half of all net new housing units in the metro area.

Third, the most rapid rates of net growth were experienced in Jeffersonville (+32%), and Bullitt and Oldham counties (both +39%). Without effective regional growth management policies – and with the impact of an East End Bridge – Louisville's version of Chicago's "collar counties" will take over the housing construction lead from Jefferson County during this next decade.

The past decade also brought modest improvement in desegregating the regional housing market further. Metro Louisville's segregation index improved modestly from 69 in 1990 to 64 in 2000 (100 = total apartheid). In 1990, 60% of the 7-county region's African Americans (and 69% of its African American homeowners) lived in majority black neighborhoods. By 2000, 55% of the region's African Americans lived in majority black neighborhoods. That should foreshadow some reduction in the degree of the "segregation tax" on African American home values.

How did all these factors add up in terms of real change in home values? From the one statistic on housing value provided thus far by the Census 2000 Supplementary Survey, Jefferson County's median home value increased from $56,600 in 1990 to $103,867 in 2000. Adjusted for inflation, that was an eye-popping 37% increase in real value in Jefferson County. By contrast, for the whole USA, median home value rose from $79,100 to $120,496 – a solid, but much more modest 14% increase in real value. In other words, comparing the only new, apples-to-apples, census data yet available, real home values within Jefferson County improved at about two and a half times the national rate.

What about the rest of the region or sub-areas within Jefferson County? Some insight can be gained by going to average home sale prices reported throughout the decade by the National Association of Realtors and by the Greater Louisville Association of Realtors

Table 11 summarizes their reports for the 1990s. They paint the same overall picture as the first fragment of Census 2000 data on home value. For metro Louisville, the median sales price jumped from $60,800 to $116,700 – a 43% real increase.

The local Association of Realtors data breaks the region down into five suburban groupings and nine sub-zones within Jefferson County. Overall, the mean sales price increased from $84,595 (1990) to $153,918 (2000) – an impressive 36% after adjusting for the national rate of inflation. The greatest increases were recorded in Bullitt County (60%) and Northern Oldham County (53%) as would be expected for such rapidly suburbanizing areas.

Hwever, the patterns within Jefferson County are also intriguing. Zone 1 (Downtown/Old Louisville/West Louisville/Shively) includes all of my designated West End and West End Annex and much of my Shively/South Louisville area. Real home sale prices jumped 46% from 1990 to 2000 – a rate of improvement exceeded only by Zone 4 (Pleasure Ridge Park/Valley Station) covering Southwest Louisville. By contrast, Zones 7, 8, and 9, comprising eastern Jefferson County (including Sprawlsville) lagged somewhat behind other zones, though real growth was still very impressive (40%, 17%, and 36%, respectively).

In part, these patterns may largely reflect the old adage that "the last shall be first, and the first shall be last." When the base level is low, it is easier to score large percentage increases; starting from a high base, big percentage gains are tougher. The two lowest sales price zones in 1990 (Zones 1 and 4) scored the highest rates of increase (46% and 47%). The two highest sales price zones in 1990 (Zones 8 and 9) scored the lowest rates of increase (17% and 36%).

Differential rates of gain should not obscure the fact that tremendous disparities still existed in 2000. The average sales price in Zone 8 (Sprawlsville) was four times higher than the average sales price in Zone 1 (West End). Despite impressive gains in the past decade, Zone 1 only closed to gap from 39% to 43% of the average sales price throughout the entire region.

There are several other cautionary notes. Home sales prices are not identical with home values. (In 1990, Metro Louisville's median home sales price was almost 9% higher than its median home value.)

More importantly, means are not medians. Medians identify the mid-point of a data set. Means are heavily influenced by extremes. In 2000, the sale of a number of new, higher-priced homes (at Parc du Val, for example) would have significantly lifted Zone 1's mean sales price for the year.

Nonetheless, full reports from Census 2000 will undoubtedly support the basic story of the prosperous 1990s: real home values in the region's housing

market made a strong comeback, and the West End, West End Annex, and Shively/South Louisville benefited substantially along with the rest of the region.

In fact, if median home values in the West End increased at the same rate as median sales prices for all of Zone 1, long-term homeowners will have made up the previous 20 years of losses and moved onto the positive side of the ledger. As a long-term investment, however, the real increase in value of the surviving housing stock in the West End (perhaps 15-20%) will still be far short of Jefferson County's 30-year real increase (55%).

Vanishing Assets

It is worth focusing on that phrase "surviving housing stock." For the West End, the good news is that home values are finally increasing faster than inflation. The bad news is that the regional housing market continues to render a portion of the West End's housing stock economically unmarketable. Much older housing (once somebody's valuable asset) continues to "vanish." Setting aside federally-supported, mixed income developments like Parc Du Val, there is still little market incentive to build new, higher-end, market rate homes in the West End.

The only way to capture some sense of what is lost is to turn to county property tax records. From US Census of Governments data, Table 12 tracks changes in assessed valuation for the Kentucky portions of the Louisville area. (Indiana uses such different standards to establish assessed valuation that it is too confusing to display both states on the same page, and the figures cannot meaningfully be combined into a bi-state, metropolitan total.)[11]

In 1971, Jefferson County accounted for 95% of the assessed valuation of real and tangible personal property in the Kentucky portion of the current Louisville metro area (Bullitt, Jefferson, and Oldham counties). By 1981, Jefferson County's share had slid slightly downward to 92%; and by 1991, to 90%.

Jefferson County's relative net loss of market share was based entirely the loss of property valuation within the city of Louisville. In 1971, Louisville

[11] Tracking changes in assessed property valuation over time is tricky. Assessment methodologies change, which clearly has occurred periodically in the state of Kentucky. The assessment formulae vary from state to state, complicating comparisons for bi-state metro areas like Louisville. For instance, in 1991, Kentucky's assessment standard was "fair cash value" while Indiana's assessment standard was "just valuation," defined as "one third of the true tax value." Finally, assessments often lag changes in current value. Kentucky law calls for "annual valuation of each parcel of taxable realty...with physical examination no less than once every four years." Indiana's calendar calls for reassessment every fourth year, beginning in 1993. Thus, this analysis will focus on only the Kentucky portion, *which understates the relative decline in Louisville and Jefferson County's share of the regional tax base.*

accounted for 44% of the Kentucky portion. Just a decade later, in 1981, its share had dropped precipitously to 32%.

Using different data standards, Table 13 brings the trends up to date. The city of Louisville, which had lost - 30% of its real tax base from 1971 to 1981 (Table 12), returned to positive real growth (+ 10%) during the 1990s. However, the city's rate of real growth in market value of property was far outstripped by the rest of Jefferson County's real growth rate (38%) – not to mention the triple digit rates achieved by Bullitt and Oldham counties (not shown yet).

Overall, urban sprawl has diminished the city of Louisville's share of the region's property wealth steadily. From 32% in 1981 (using one data base), the city had declined further to an estimated 26% by 2000 (using another data base).

Moreover, the city's rebound in terms of the real value of residential, commercial, and industrial property in the 1990s does not negate the long-term picture. Since 1971, adjusted for inflation, the city of Louisville lost 35-40% of its property tax base. Urban sprawl has helped create abandoned factories, shuttered stores, empty offices, and over 30,000 vanished homes in the urban core.

Looking Ahead – Choosing a Better Future

What is the Louisville region's future? Will the next several decades repeat the prosperous 1990s or slide more towards the troubled 1970s and 1980s?

Achieving the growth projections the DEIS cited (31% population growth and 53% job growth between 1990-2025) would require equaling the growth rates of the 1990s – a decade of economic prosperity and population growth unequaled in the nation's history.

Spurred by the East End Bridge, much of the new housing projected would undoubtedly be built in eastern Clark County regardless of the state of the region's economy. Net household formation will likely continue to fall well short. The result will be steady abandonment of older housing in core areas with little market incentive for construction of higher-end housing. Will the "last" (West End) continue to be "first" as it was in the 1990s, slowly but steadily closing the home value gap with the rest of the region? Or will the patterns of the 1970s and 1980s reassert themselves and West End homeowners find the real value of their most important asset eroding year-by-year?

A respected public official stated to me that the key DEIS assumption that the city of Louisville and central Jefferson County are already largely built-out

with little capacity for new growth is "probably correct, but it's correct under the current rules. What we have to do is change the rules."

Table 14 contrasts metro Louisville with a region that began changing its "rules of the game" almost thirty years ago – Portland, Oregon-Vancouver, Washington. There are far more similarities between the two regions than local leaders may recognize. They are equally divided by major rivers between two states. They share similarly diverse populations – 82% white, 18% minority.[12] The Louisville area lost many traditional manufacturers before making a service- and transportation industry (UPS) driven comeback in the 1990s. Portland (and Oregon's) economy was depressed by the decline of forest products industries before the Portland area took off as "Silicon Forest" in the 1990s. In the 1990s, both regions had hot housing markets as the real increase in median home sales prices for Louisville (43%) and Portland (63%) ranked them among the ten fastest escalating markets in the USA.

But Portland's – or, more accurately, Oregon's – changing the rules of the game in the early 1970s has made a decisive difference. Oregon's Statewide Land Use Act (1973) mandated that all counties develop anti-sprawl land use plans and that all cities within them must adopt urban growth boundaries. (The state of Washington followed with an almost identical law in 1990.)

The land use laws' statewide impacts are clear. From 1992-97, for every net new resident, Oregon developed 0.36 acres of land; Washington developed 0.44 acres. But, without any statewide, anti-sprawl controls, for every net new resident, Indiana developed 0.73 acres, and Kentucky developed 1.33 acres!

To implement state policies locally, the Oregon legislature and Portland area voters established Portland Metro, the USA's only directly-elected regional land use and transportation planning agency (one person/one vote). The Kentuckiana Regional Planning and Development Agency (KIPDA) has no land use planning powers; out of 19 voting members of its Transportation Planning Committee (that, under federal law, has real power), only two or three members represent the city of Louisville and Jefferson County that are two-thirds of the region's population.

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[12] Within the context of the sad racial history of American society, the Louisville area probably will continue to find integrating its 14% African American population (all multi-generation natives) harder than will Portlanders will find accommodating its 7% Latino and 6% Asian populations (many of whom are recent immigrants). Portland's African American population (3%) is rapidly integrating into a wider range of neighborhoods and schools than in earlier decades. (Like Indiana, Oregon had a racial exclusion law in the 19th century.)

Based on a very inadequate and limited assessment of its impact, Kentucky and Indiana officialdom is lined up to move full steam ahead on the East End Bridge. After comprehensive transportation, land use, environmental, and socioeconomic evaluation (the LUTRAC process), Portland Metro judged that a proposed interstate beltway around the Portland-Vancouver region would promote so much sprawl and urban disinvestment that they cancelled it forever.

Downtown Louisville is cut off from its Ohio riverfront by ribbons of elevated interstates. Portland tore down its first-in-the-nation riverfront interstate at local expense; it is now the site of the Governor Tom McCall Riverfront Park.

The Louisville region seeks $1.5 billion in federal funds for interstate improvements and new bridges. In the 1970s and 1980s, Portland reprogrammed its federal funds away from building more highways to building its highly successful light rail system.

Despite some thoughtfully-designed, vest pocket parks and islands of urbanity, Downtown Louisville is checker-boarded by parking garages and surface parking lots. (My educated guess is that over 70% of Downtown's land area is devoted to the automobile.) Sixty percent of persons in Downtown Portland arrive by light rail, bus, bike or walking.

Unlike many other downtowns, Downtown Louisville can still boast of a full-service department store, but Dillard's in the Galleria turns off the lights at 6 p.m. every evening. Downtown Portland has four thriving department stores, included Nordstrom's and Sax Fifth Avenue.

Louisville's West End pleads for public policies and private initiatives that will bring market-rate housing back to this poverty-impacted, historic black neighborhood. Portland's West End was the Albina area located across the Willamette River in Northeast Portland. (In 1990, Albina was the region's poorest neighborhood; it included six majority black census tracts.) In the face of an economic boom during the mid-1990s, Portland's urban growth boundary was so successful in re-directing market investment back into the urban core that Albina's home values doubled in five years. At $10 a copy, the city planning department's computerized listing of vacant and abandoned property in Albina (updated weekly) was a runaway bestseller among real estate investors.

I do not know of any American community, including Portland, that is exempt from racial and class injustice. But in the 1990s, the Portland area had the

greatest single improvement in the racial segregation index (dropping from 66 to 48) of any of the USA's 320 metropolitan areas.

In fact, because of its different "rules of the game" – its different approach to land use and transportation planning decisions – the 60 plus square miles of the pre-1950 city of Portland has gained measurability in population and household density since 1970. Portlanders would look upon the allegedly "built-out" city of Louisville and central Jefferson County and see plenty of developable land – if Oregon's rules were in effect.

So the key issue is not which past – the depressed 1970s and 1980s or the prosperous 1990s – will be prologue for greater Louisville's future.

The key issue is what choice Kentucky and Indiana leadership – and federal officials – make about the "rules of the game" that will shape greater Louisville's future.

Building the East End Bridge will perpetuate urban sprawl and debilitate core area recovery. That action is another installment of the old rules.

Rejecting the bridge and adopting new rules (strong state growth management laws, mandatory mixed-income housing through inclusionary zoning, focusing office-based employment growth in Downtown Louisville and other key employment nodes in already urbanized communities, leveraging high-quality job centers into stimulating market-rate housing in surrounding neighborhoods, investing in light rail and transit-oriented development rather than sprawl-promoting highways and bridges) will create a more livable greater Louisville.

A more livable greater Louisville where future generations can live in greater harmony with Nature – and with each other.

REPORT 3: OHIO RIVER BRIDGES PROJECT: SPRAWL AND URBAN DISINVESTMENT

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Introduction

This report examines possible impacts of an easterly bridge alignment as set forth in the Draft Environmental Impact Statement (DEIS) and Al Chalabi Group report (ACG). We are particularly concerned with the impact of an easterly bridge on land use patterns, population settlement, social composition and housing values in the Louisville Metropolitan Area (LMA). In examining these impacts we analyze issues of suburban sprawl, the geographic distribution of population, concentrations of poor and minority groups (mostly African American) and relative differences in housing values. At times we take a longitudinal perspective and examine these factors over the last two or three decades. Our objective is to provide an analysis of sprawl, social conditions and investment patterns within the LMA, so readers can better understand how trends might be affected by bridge construction. In conducting this analysis we focus on two neighborhoods as case studies for how people and land use are affected. These two distinct neighborhoods are located respectively on the West End of Louisville, and the Southeast portion of Jefferson County.

Next, we examine evidence from similar bridge alignments in the Cincinnati Metropolitan Area (CMA). The CMA comprises counties in Northern Kentucky and its bridges also span northerly sections of the Ohio River. This presents useful parallels with Louisville and its environs. Here again we are interested in how land use patterns, social composition and housing value have been shaped by bridge construction. These changes are then distilled and used to provide an idea for how future bridge construction might affect Louisville and Jefferson County. We extrapolate basic tendencies related to sprawl

and investment and draw a future picture of what might occur within over the next two decades.

Last, we draw observations on what can be reasonably expected to take place with respect to land, people and costs or investment within the LMA. Our findings are based on current trends within the LMA, extrapolations of data and experience from the CMA, results from the established literature, acknowledged findings from the Draft Environmental Impact Statement (DEIS) and logical inferences about the likely effects of highways and river crossings.

Sprawl and the Louisville Metropolitan Area

Sprawl can be defined as high land consumption for residential or nonresidential use coupled to a process by which development spreads outward in a noncontiguous (leapfrog) manner.[1] Sprawl frequently grows out of an established urban core, consuming sizable portions of farms, forests, wetlands and open space. It also tends to segregate land uses, so that residence is separated from shopping, leisure, schools and other facilities. This makes sprawl highly dependent on the automobile and less amenable to mass transit. For a variety of reasons sprawl also tends to correlate with racial and income segregation.[2] Sprawl is a complex phenomena, and all of its aspects are not easily

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[1] For a comprehensive account of sprawl see Robert Burchell et al. the costs of Sprawl Revisited, National Academy Press, Washington D.C. 1998.

[2] See, Jargowsky, P.A., 1997, *Poverty and Place*, New York: Russell Sage Foundation. Massey, D.S., Denton, N.A., 1993, *American Apartheid*, Cambridge, Massachusetts: Harvard University Press Powel, J.A., 1999, "Achieving Racial Justice: What's Sprawl Got to Do With It? "Poverty and Race Research Action Council, http://www.prrac.org Thomas, R., Thomas, J., Hill, R.C.,Darden, J.T., 1987,

measured, but there are accepted ways of calculating its presence.[3] One way is to plot land consumption while another is to measure population densities. Land consumption is typically measured on a per capita basis, and its extent is determined by dividing the total urbanized land area by the total number of people. This is the inverse of population density, which is the number of people per unit of urbanized land. When per capita land consumption goes up, density goes down. When per capita land consumption goes down, density goes up.

These simple measures can be applied to the Louisville Metropolitan Area or LMA. This area embraces portions of two states and currently consists of Jefferson, Oldham, Bullitt counties located in Kentucky and Floyd, Scott, Clark, and Harrison counties located in Indiana. Within the metropolitan area Louisville and Jefferson County are respectively its central city and central urban county. Together they hold the largest, most densely settled and diverse populations and account for the bulk of the region's economy.

Over the years the total metropolitan area has expanded, and during the last ten years increased from five to its current seven county composition. This change is not only signaled by growing commercial and social interaction among these counties, but by the increased consumption of rural land and its conversion into suburbs, "edge cities",

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Detroit: Race and Uneven Development, Philadelphia: Temple University Press Reeves, K., Steeh, C., Jackson, T., Krysan, M. Farley, R., 1993, Continued Racial Residential Segregation in Detroit: "Chocolate City, Vanilla Suburbs" Revisited *Journal of Housing Research* 4 (1) 1-35

[3] Density and land consumption are necessary starting points for analyzing sprawl, but not sufficient for any extensive, major and lengthy analysis such as a comprehensive DEIS. Other measurable elements that should be applied are *continuity of settlement, clustering of land uses, nuclearity of development,* the extent of *mixed uses,* the *proximity of different land uses to each other, and the ratio of urbanized land growth to urban population over time.* See for example, Galster, G., Hanson, R., Ratcliffe, M.R., Wolman, H., Coleman, S. & Freihage, J., 2001, "Wrestling Sprawl to the Ground: Defining and Measuring and Elusive Concept" *Housing Policy Debate*, 12(4):681. Also see, Robert Burchell, et al. 1998 The Costs of Sprawl—Revisited Center for Urban Policy Research, The Costs and Benefits of Alternative Growth Patterns, Ritgers University, New Bruswick, New Jersey

retail malls and strip development. As one moves out from the center, land consumption is greater, densities grow noticeably thinner, the population becomes less diverse, and development patterns becomes more discontinuous.

Figures 1 and 2 present maps of the seven county region and demarcate county boundaries. They also show major highways leading toward and around the Ohio River. The maps respectively portray land consumption and population densities in the seven county region. Figure 1 delineates land consumption by showing its progression from as low as .004 square miles per inhabitant to a high of .13 square miles per inhabitant. Figure 2 delineates population densities by showing it moving from 860 people or fewer per square mile to a high of nearly 36,000 per square mile.

As we can see the maps complement each other. Each tells us that sprawl increases from the center of the region outward. As one moves toward the extreme peripheries of the region, per capita land consumption goes up and densities go down. Despite the higher densities within the city, population has been declining and this has kept densities comparatively low by the standards of other cities.[4] Thus, average density within the municipal bounds of Louisville is 92 percent of its upriver neighbor Cincinnati.[5]

Contrary to claims made by ACG, Louisville holds a good deal of vacant land that can be developed. More than 1700 acres lie vacant within the city, equivalent to 4.3 percent of its land area.[6] This figure does not account for increasing numbers of

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[4] Over the past three decades Louisville has lost 29 percent of its population, going from 361,706 in 1970 to 361,706 in the year 2000. See, *Resident Population: Kentucky Cities.* Kentucky State Data Center. University of Louisville. 2002

[5] Louisville has an average density of 4,364 persons per square mile while Cincinnati has an average density is 4,718 persons per square. The difference between the two cities is 7.5 percent

[6] Pagano, Michael and Bowman Ann, *Vacant Land in Cities: An Urban Resource* (Brookings Institution, Washington, D.C. 2000. p. 4.

abandoned housing units that can be refurbished as residences or land use ordinances that can be changed in order to accommodate commercial development. For example, out of 83 cities surveyed, Louisville was sixth in the number of abandoned housing units, with a rate of 5.70 per 1000 inhabitants.[7] If Louisville lacks developable land, local builders are not aware of it. In a 15 item survey of Kentucky and Indiana developers a "lack of developable land" was listed as next to last as a reason for not building affordable housing".[8]

Note too that highways are critical points of demarcation and settlement. People and industry tend to gravitate in low density settlements around and alongside highways and connectors like bridges. Highways make sprawl possible, probable and desirable. The very character of highways means that transportation patterns can be fluid. Automobiles increase land consumption and encourage helter-skelter settlement patterns —randomly apportioning development along fluid highway corridors. To appreciate that argument, think of the multiple exits one can take along interstate corridors and the local roads onto which people can fan. By contrast rail transportation furnishes relatively fixed points of settlement. Rail terminals encourage clustered settlements around set points, such as traditional cities, small villages and new towns. There are other characteristics associated with sprawl, which we take up in the next section.

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[7] Ibid., pp. 4-5.

[8] The survey did list inexpensive land as a major impediment, but this far different from a lack of land and was a reasonable response given the low profit margins of modest or low income housing. See, Stallings, Angela, *Building Community: An Affordable Housing Development Survey.* Metropolitan Housing Coalition, Louisville, Kentucky, July 2000. p. 5.

Sprawl and Socioeconomic Characteristics

We cannot assume a causal connection between sprawl and particular socioeconomic effects. Nevertheless, experience and empirical studies show some strong associations between sprawl and social patterns. The literature is replete with observations that new, more thinly populated, high land consuming communities are also more racially and economically segregated.[9] Metropolitan areas are often polarized between poorer, minorities inhabiting the central city and affluent, white populations settling in peripheral suburbs. Undoubtedly, there are many reasons for this. First, housing in lower density suburbs is more costly and minority groups also have lower incomes, thereby making it more difficult to purchase a suburban dwelling. Moreover, multifamily housing is more prevalent in central cities than suburbs, and this tends to concentrate less affluent populations. Second, either because of existing social and religious institutions or easy access to employment or familiarity with particular neighborhoods, minority populations are not inclined to settle in the suburbs. Third, exclusionary zoning and other legal mechanisms, make it difficult for minority and poorer populations to settle in predominantly white suburbs. Fourth, sheer prejudice and the weight of social custom take a toll. By these informal habits African Americans are kept out of many suburbs.[10]

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[9] Sigelman, L., Henig, J.R., 2001, "Crossing the Great Divide: Race and Preferences for Living in the City Versus the Suburbs," *Urban Affairs Review* 37(1):3-18. Strait, J.B. 2001, "The Impact of Compositional and Redistribute Forces on Poverty Concentration: The Case of the Atlanta, Georgia, Metropolitan Region 1980-1990," *Urban Affairs Review* 37(1):19-42.

[10] Powel, J.A., 1999, "Achieving Racial Justice: What's Sprawl Got to Do With It? "Poverty and Race Research Action Council, http://www.prrac.org Thomas, R., Thomas, J., Hill, R.C.,Darden, J.T., 1987, *Detroit: Race and Uneven Development*, Philadelphia: Temple University Press Reeves, K., Steeh, C., Jackson, T., Krysan, M. Farley, R., 1993, Continued Racial Residential Segregation in Detroit: "Chocolate City, Vanilla Suburbs" Revisited *Journal of Housing Research* 4 (1) 1-35

Whatever the complexity of reasons for social and economic segregation, the LMA follows typical patterns. These include 1) a concentration of poorer and African American households in parts of the central city and diminution in lower density suburbs 2) lower household values in the central city and higher values in suburban and peripheral areas 3) a substantial diminution of access by poor and minority groups to employment opportunities in the suburbs and 4) lower rates of automobile ownership among poor and minority populations.

We begin with household income. Figure 3 shows the distribution of families by income within the LMA. Annual household income is shown in the legend and varies from less than $16,000 to $127,000.

Generally household income follows patterns of land consumption and density described above. Income is lowest in the center and higher in the peripheries. Note especially that the south and south western portion of the LMA (in both Jefferson and Bullitt counties) have modest household income. By contrast, the most affluent portions of the LMA are in the easterly suburbs and most heavily concentrated in the northeast.

We can also see these trends accelerating through the 1990s. The wealthiest areas in the LMA are growing richer, while poorer areas fall behind. Table 1 summarizes tendencies for the LMA, Louisville and suburbs. The data shows the recent distribution of wealth as measured by annual payroll and average annual pay.

Between 1991 and 1997 annual payroll and average annual pay continued to move both outside the city and into easterly suburbs. During this period of unprecedented national prosperity annual payroll and average pay rose throughout the LMA. In the city annual payroll increased by 7.3 percent while it skyrocketed in the suburbs by 54 percent.

The gaps in annual pay were not as dramatic but nonetheless present. Average pay in the city rose by 9.1 percent while in the suburbs it climbed to 10.9 percent.

Table 1
Annual Payroll and Average Annual Pay in Louisville Metropolitan Area: 1991-1997

		Louisville Metro	City of: Louisville, KY	Suburbs
Annual Payroll (1,000s of 1999 Dollars)	1991	$10,576,359	$5,776,871	$4,799,488
	1997	$13,591,741	$6,199,562	$7,392,179
	Pct. Change	28.5	7.3	54.0
Average Annual Pay (1999 Dollars)	1991	$25,632	$28,127	$23,158
	1997	$27,747	$30,698	$25,676
	Pct. Change	8.3	9.1	10.9

Source: SOCDS County Business Patterns Special Data Extracts: Output for Louisville, KY (available at www.huduser.org)

These differences are reflected in housing values. Rather than annual salaries or wages, these values come closer to showing accumulated wealth and assets that can be transmitted through generations. They are then significant indicators of long term prosperity and portend a great deal for future distributions of wealth and investment.

Figure 4 shows median housing value within the LMA. These values range from a low of less than $24,000 to a high of $ 287,000 per housing unit.

Again, the lowest values are found in central portions of the city, while the highest are substantially concentrated in the peripheries. Most informative is the difference between suburbs. Suburbs in the south and southwest, including Jefferson and Bullitt counties have modest housing values. Those in northeast are considerably higher.

Last, we fill in this picture with racial patterns. These patterns largely follow the contours of density, land usage, income and housing values. Figure 5 shows patterns of settlement for African Americans within the LMA. The proportion of black residents

varies from less than 6 percent to as high as 100 percent. Note too the alignment of highways, particularly the city's inner ring road (I 264) and its north-south highway (I 65).

As the map shows African Americans are heavily concentrated within the inner ring highway (I 264) and in westerly portions of the city (bisected by I 65). Though there are notable exceptions these areas are located in the West End of Louisville or northwest quadrant of Jefferson County (see map in the Appendix). Generally, African Americans find themselves in more densely populated areas with the least income and the lowest housing values. As mentioned, there are some notable exceptions to this pattern. Patches of African Americans can be seen in Southeastern quadrant of Jefferson County and a few quite isolated settlements in the northeast. These are relatively small and represent a degree of suburban settlement among blacks, albeit a possible re-segregation outside the city.

The disadvantages incurred are both geographic and largely (though not exclusively) racial in character. These disadvantages are cumulative. Residence in the westerly sections of the LMA also pertain to being poor, being African American and having less access to transportation and employment in the northeast. The placement of easterly bridge alternatives is heavily skewed toward white affluent, high housing value suburbs. These suburbs are already on a rising trajectory of wealth and this has continued through the 1990s.

Uneven Development, Highways and Bridges: Focusing on Two Communities

Development patterns within the LMA are unbalanced and growing more so. The best off areas are high land consumption suburbs in the Southeast and Northeast quadrants of Jefferson County. Worse off are areas in the Southwest quadrant of Jefferson County and to some extent in Bullitt County. The very worst off areas are more densely populated portions in the West End of the city or Northwest quadrant of Jefferson County (see map in the Appendix). Over time these imbalances are growing. While highways and bridges are not exclusive determinants for how areas develop they are important. Highways and bridges are not simply methods of transportation, but are laden with implications for stimulating development, generating wealth, and providing job access.

To illustrate the impact these thoroughfares have on particular areas, we have selected two neighborhoods. The first is an inner city community, located in the northwest quadrant and called West Louisville; it encompasses eleven census tracts. Another is located at the opposite southeastern end of the county, called Southeast Jefferson: it encompasses twelve census tracts. The West Louisville community is bounded by 15th street on the east, 28th street on the west, Market Street on the north and Algonquin Parkway on the south. The Southeast Jefferson neighborhood boundaries are irregular and extend west to east from Preston Highway to Bardstown Road, and north to south from Appliance Park to the Jefferson County line.

Figure 6 shows each of these neighborhoods. Note, the Southeast Jefferson community directly straddles the outer ring high (I 265 or the Snyder Freeway) and

connects directly to eastern bridge alternatives. It is also close to Jeffersontown. Referred to as "J-town", this locality is a burgeoning second class city, which houses the LMA's largest industrial park, and is a major source of jobs and investment.

It is instructive to examine how highway construction contributed to neighborhood change. I 265 began in the 1960s and was completed during the 1970s. Areas around the new highway quickly began to attract residents, precipitating "white flight" from the inner city. The Southeast Jefferson community became the beneficiary of highway accessibility and attracted a large number of new developments and business. Meanwhile, the West Jefferson neighborhood began to whither, losing residents and business; it also became increasingly segregated.

Table 2 presents a statistical picture of these two neighborhoods between 1960 and 1990. The table shows changes over these years for population, race, housing, and mass transit use.

Table 2
Socioeconomic Characteristics: West Louisville and Southeast Jefferson Neighborhoods, 1960-1990

		1960	1970	1980	1990
Population (thousands)	West Louisville	45.0	38.4	26.6	20.8
	Southeast Jefferson	13.7	37.7	48.9	55.7
Percent African-American	West Louisville	50.8	81.8	90.4	93.6
	Southeast Jefferson	0.6	0.3	1.0	4.4
Housing	West Louisville	14.5	13.7	10.9	9.8
	Southeast Jefferson	3.8	10.1	16.0	20.2
Percent Bus Riders	West Louisville	31.6	25.7	24.0	23.7
	Southeast Jefferson	3.1	0.9	2.0	1.5

Notes: West Louisville neighborhood area – 3.4 sq. mi.; density – 13, 200 person/sq. mi. (1960) and 6100 person/sq. mi.(1990). East Jefferson neighborhood area – 42.9 sq. mi.; density – 319 person/sq. mi.(1960) and 1300 person/sq. mi. (1990).
Source: Census of Population and Housing, Census Tracts, Louisville Ky – In, 1960-1990.

From 1960 to 1990, the population decreased by more than 50 percent in the West Louisville neighborhood and increased by more than 300 percent in the Southeast Jefferson suburb. West Louisville lost 33,000 people, more than half of its population. Almost all of the departing inhabitants were white. At the same time the black population increased from 50 percent to 94 percent. Southeast Jefferson stabilized at more than 95 percent white with the black population rising to less than 5 percent.

Housing was just as profoundly affected. The numbers show that between 1960 and 1990 housing construction collapsed in the west and surged in the east. In West Louisville housing was condemned, razed and not replaced, while Southeast Jefferson found itself flooded with investment dollars. West Louisville went from almost 15,000 to 10,000 housing units, while Southeast Jefferson rose from about 4,000 units to more than 20,000 during the same period.

While mass transit use declined over the years, a significant portion of West Louisville continued to rely upon it. By 1990 24 percent of residents used buses, while just 1.5 percent of Southeast Jefferson rode on buses. These are not unique cases, but reflect much broader patterns through the LMA.. Throughout the area poorer, minority residents depend upon mass transit to commute to work, shop or engage in social events. By comparison, white middle class or affluent residents travel exclusively by automobile.

Figures 7 and 8 shows proportions of individuals and households in the LMA using public transit to work as well as those possessing no automobile. Figure 7 shows the percent of using public transit, ranging from a low of zero to a high of 28 percent. Figure 8 shows the percentage of households with no vehicle range from a low of zero percent to as many as 96 percent.

Areas relying on public transit and with no vehicles in the household are concentrated in the western and central portions of the city. In some neighborhoods well over a quarter of workers use public transit and well over half the households do not possess an automobile. We also find a few patches in the South End of the city where families do not possess an automobile and one patch in the Southeast quadrant of Jefferson County. By contrast most of the northeastern suburbs in Jefferson County and counties in Indiana are far less reliant on public transit and have a household vehicle.

For those households that rely on public transit an eastern bridge is not an alternative. Most of these individuals and households are likely to be poor, black, inner city dwellers, living in segregated housing. If we accept the notion that bridges stimulate economic development, financial investment and job access these are the communities that will be most deprived of those opportunities.

While we cannot be absolutely sure about the exact impact a bridge will have on a metropolitan area, experience from other localities can provide a glimpse of a possible future. Also there are some striking parallels between Cincinnati and Louisville with regard to the socioeconomic impact of bridge crossings. The metropolitan area of Cincinnati or CMA lies approximately 100 miles north of Louisville and it straddles northerly portions of the Ohio River. Like most traditional metropolitan areas the CMA contains an inner city, which is heavily poor and increasingly inhabited by minorities, as well as affluent white suburbs.

Bridges, Sprawl and Investment: An Examination of Patterns in Cincinnati

In the late 1970's Cincinnati completed Interstate Highway 275 (I 275), the circular highway pattern around its metro area. Bridges across the Ohio river that complete this I 275 circle lie 5 miles east of Cincinnati and 20 miles west of it.[11] The easterly bridge, called East I 275 (Combs-Hehl Bridge) contains six lanes while the westerly bridge, called West I 275 (Caroll Cropper Bridge) contains four lanes. In addition two major bridges cross the Ohio River from Kentucky directly into downtown Cincinnati. [12]

Figure 9 shows the CMA with its constituent counties in both Ohio and Kentucky. Also included are bridge crossings directly connecting the Cincinnati downtown to its suburbs in Northern Kentucky as well as eastern and western bridge alternatives.

Note the rough parallels between the Kentucky-Ohio crossings and those of the proposed Kentucky-Indiana crossings. In the following sections we examine possible impacts of these bridges. We begin with a broad lens by focusing on the larger CMA. Next we use a medium sized lens to examine census tracts in Hamilton and Clermont Counties. Last we apply a narrower lens to census tracts within a portion of Hamilton County.

Table 3 shows demographic and socio economic data for the most populace counties and cities in the CMA. Cities are listed under their respective counties. The table covers the period between 1960 and 2000 and portrays characteristics by population, minorities, income and housing values.

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[11] Respectively completed in 1979 and 1977

[12] In addition to these two major downtown bridges four smaller bridges tie eastern Kentucky to downtown Cincinnati.

Table 3
The Cincinnati Metropolitan Area (CMA): Socioeconomic Characteristics, 1960-2000

Population - 1000's					
Jurisdiction	1960	1970	1980	1990	2000
Hamilton County.	864	924	873	866	845
Cincinnati	503	453	385	365	
Hamilton Suburbs	361	471	488	501	
Clermont County.		96	128	150	178
Kenton County	121	129	137	142	151
Covington	60.4	52.5	49.6	43.6	
Boone County.		32.8	45.8	57.6	86
Florence			15.6	19.3	
Campbell County	87	88.5	83.3	84	87
Fort Thomas			16.0	16.1	
Newport	30.1	26.0	21.6	18.9	
Minority Population – Percentage					
Jurisdiction	1960	1970	1980	1990	2000
Hamilton County	14.5	16.0	20.0	22.3	27.1
Cincinnati	21.9	28.3	34.8	39.7	
Hamilton Suburbs	4.2	4.2	8.3	9.6	
Kenton County	3.3	2.9	2.9	3.7	5.3
Covington	6.0	6.5	7.3	9.2	
Boone County		0.6	0.9	1.6	4.7
Florence			1.9	5.2	
Campbell County	1.1	1.0	1.3	1.7	3.4
Fort Thomas			0.6	1.2	
Newport	2.7	3.1	4.2	4.8	
Median Income - $1,000's					
Jurisdiction	1960	1970	1980	1990	2000
Hamilton County	6.5	10.5	17.4	37.2	38.8
Cincinnati	5.7	8.9	12.7	26.8	
Hamilton Suburbs	7.6	12.0	21.1	44.7	
Kenton County	5.8	9.5	17.2	36.1	41.6
Covington	5.3	7.7	11.9	26.2	
Boone County		10.0	20.5	34.5	49.0
Florence			19.0	31.3	
Campbell County	5.9	9.5	16.9	35.0	39.2
Fort Thomas			20.9	44.8	
Newport	5.3	7.7	11.8	22.9	
Median House Values- $1,000's					
Jurisdiction	1960	1970	1980	1990	
Hamilton County	16.2	18.6	48.8	71.9	
Cincinnati	15.1	16.4	40.8	61.7	
Hamilton Suburbs	17.6	20.7	55.1	79.0	
Kenton County	11.4	15.3	40.9	64.8	
Covington	9.0	11.0	24.6	41.6	
Boone County		16.8	49.0	74.4	
Florence			48.2	68.6	
Campbell County	11.9	14.7	36.5	62.2	
Fort Thomas			49.0	80.8	
Newport	9.3	10.6	20.9	37.3	

Sources: Census of Population and Housing, Cincinnati Oh - Ky – In, 1960 – 2000.

Over the past four decades Cincinnati's urban core has lost more than a third of its population, while the suburban population of Hamilton County has increased by a third. This shift in population is characterized by "white flight" to the suburbs. The table shows the minority center city population increasing from 20 percent to 40 percent while the suburban minority population remains at less than 10 percent.

Income, housing values and poverty show a similar trend. The income and housing gap between the center city and the Hamilton County suburbs has continued to grow. In 1970 median income of a city dweller was 25 percent less than for a suburbanite, and by 1990 that disparity had widened to 40 percent. Poverty is not shown in the table, but that too has been increasingly concentrated in the city. Between 1970 and 1990 the poverty rate within Cincinnati increased from 17 percent to 24 percent. By contrast, within the suburbs poverty rates remain below 8 percent and are even decreasing.[13]

Demographic trends in other counties and cities reinforce the overall tendency toward sprawl. Older cities like Covington located in Kenton lost population, while the rest of the county increased by about 20 percent since 1960. Another older city, Newport, located in Campbell also lost population, while the rest of the county remained stable. The two counties in the metro area that have shown the most growth are Clermont in Ohio, just east of Hamilton, and Boone in Kentucky. Each would be accurately described as representing the outer suburbs or the exurbs of the CMA.

The West I 275 bridge connects Boone County (Kentucky) with Ohio County

[13] By comparison in 1970 the median income for a city dweller in Louisville was 31 percent less than for a suburbanite, and by 1990 that disparity had widen to 36 percent. At the same time between 1970 and 1990 the poverty rate within Louisville increased from 17 percent to 23 percent; within the suburbs poverty rates remain below 9 percent (see Appendix).

(Indiana) and is considerable distance (20 miles) from downtown Cincinnati. Today little has changed in Ohio County, and it remains sparsely populated with just 5.8 percent growth over the last decade. At least in this county, a bridge has not been of great consequence. However, Boone County presents a different picture. Even at a considerable distance from downtown Cincinnati, Boone has seen very significant growth. Its population increased from 33,000 in 1970 to 86,000 by the year 2000, constituting an extraordinary rise of 160 percent. This increase could reasonably be accounted for by two factors— the West I 275 bridge and the Northern Kentucky-Cincinnati Metropolitan Airport (located in the northeastern corner of Boone County).[14]

The East I 275 bridge lies just five miles east of downtown Cincinnati, and bears a semblance to the proposed northeastern alternative bridge in Jefferson County. Circular highway I 275 connects Campbell County (Kentucky) with Hamilton County (Ohio). The population of Campbell has not changed significantly over the past 40 years, and it has remained quite stable. In some ways Hamilton County is an appropriate analogue to Jefferson County. While its central city of Cincinnati has lost a third of its population since 1960, the county has remained stable with 845,000 current residents. However, Hamilton has experienced a major redistribution of its population. Many of its central city residents have moved to sprawling outer eastern suburbs. This shift should be considered in conjunction with growing population in another county, further to the east of Hamilton County. Clermont County also has experienced considerable growth and a

[14] Boone Census Tract 705 is located near the west end bridge. Over the last three decades that tract grew in population from 4000 to 8800 for more than a 100 percent increase. This is a small base from which to rise. Taken in conjunction with more dramatic rises in the rest of Boone County this growth is not particularly impressive, and it could show that the airport may be far more decisive for Boone's growth than the West I 275 bridge. It could also indicate the reciprocating influences that bridges and airports have on development.

good deal of sprawl. Indeed, these high growth tracts are further to the east of the I 275 bridge and away from downtown Cincinnati. They illustrate that development occurs further away from downtown areas and spreads in multiple direction around a major thoroughfares.[15] Here is where a bridge placement can be decisive.

Table 4 portrays key census tracts along I 275 between 1970 and 1990. These tracts are located in southeastern Hamilton County and southwestern Clermont County.

Table 4
Hamilton and Clermont Counties:
Characteristics of Selected Census Tracts, 1970-2000

	Population Trends - 1000's			**Median House Price - $1000's**			**Median Income - $1000's**		
Census Tracts	1970	1980	1990	1970	1980	1990	1970	1980	1990
250	13.0	13.7	14.6	24.3	61.5	91.2	13.5	27.6	45.8
251	10.3	14.4	18.4	25.5	72.3	125.8	13.9	28.4	54.3
SE Hamilton Total	23.3	28.1	33.0	24.7	67.2	110.5	13.6	28.1	50.5
412	4.3	5.3	5.3	16.5	48.1	69.3	11.9	20.2	35.0
413	6.6	10.2	13.5	17.9	54.2	72.9	11.5	22.7	35.7
414	9.6	12.7	14.6	17.3	49.8	69.2	11.3	21.7	35.7
415	5.0	7.3	9.6	16.5	54.6	79.3	10.1	22.7	38.2
SW Clermont Total	25.5	35.5	43.0	17.1	51.8	72.6	11.3	21.9	35.9

Sources: Census of Population and Housing, Census Tracts, Cincinnati Oh - Ky – In, 1970 – 1990.

In Southeast Hamilton total population grew by 41 percent, house values shot up by more than 300 percent and median income grew by approximately 300 percent. . The tracts differed in their rates of population growth. While tract 250, adjacent to Cincinnati showed a 12 percent increase, tract 251, further east and closer to Clermont County increased 78 percent. Median house prices in tract 250 rose by 275 percent while in tract

[15] This also contradicts ACG's contention that an easterly bridge will contain sprawl. The ACG report ("Socio-Economic, Development and Accessibility Impacts of No-Build and Build Bridge Alternatives for the Ohio River Bridges Project") claimed that development would occur on a single side of an easterly bridge and within a 10 mile radius of downtown (pp. 54-55). This was *not* the case in Cincinnati, and there is no reason to believe it will be the case for Louisville.

251 it rose by 393 percent. Incomes experienced the same increase rising by 239 percent and 290 percent respectively.

On the other side of the bridge Southwest Clermont County experienced similar gains. Total population grew by 69 percent, median house values increased by 325 percent, and median income climbed by 218 percent. These changes particularly stand out in tract 415 where population nearly doubled, median house values rose 380 percent, while median income increased 278 percent.

In fact, southeastern Hamilton County grew rapidly enough to have its tracts split. Table 5 takes a closer view of this growth in population, housing values and median income.

Table 5
Eastern Hamilton County, Characteristics of Selected Census Tracts, 251

	Population Trends - 1000's			Median House Price - $1000's			Median Income - $1000's		
Census Tracts	1970	1980	1990	1970	1980	1990	1970	1980	1990
251.01		2.88	3.35		77.6	115.4		30.5	61.8
251.02		7.17	7.84		66.1	94.5		27.5	48.1
251.03		3.62	5.51		66.4	113.1		25.9	48.6
251.04		0.75	1.66		138.6	339.5		39.3	90.4
251	10.3	14.40	18.40	25.5	72.3	125.8	13.9	28.4	54.3

Sources: Census of Population and Housing, Census Tracts, Cincinnati Oh - Ky – In, 1970 – 1990.

Obviously new development spurred growth in this area. Tract 251.04 more than doubled in population in just 10 years, gaining nearly a thousand new residents from 1980 to 1990. In addition, its median house price increased 145 percent, while median income rose by 130 percent. Growth in this area attracted upper income residents with highly priced new houses. Comparing all of tract 251 to the city of Cincinnati, the median

income in the city was 36 percent less than in tract 251 in 1970; this income gap increased to 51 percent in 1990.

What has attracted development to this southeastern portion of the CMA? The best explanation lies in the East I 275 bridge and its access highways. Aside from the bridge and its connecting highways, we find little reason why this area should experience dramatic growth. This sprawl not only extends well past 10 miles from downtown Cincinnati into other parts of Clermont County, but over 20 miles from downtown into Warren County.[16] These factors are pivotal for understanding development, and Figure 10 shows just how far eastward development has spread in the aforementioned Census tracts.

Lessons From Cincinnati: Sprawl and Its Costs

What can the Cincinnati experience tell us about the possible impact of an easterly bridge? Every area has its own idiosyncrasies, variables, and cultural attributes. While statistical associations between bridges and development are apparent, multiple variables may be at work in a single situation, have reciprocal effects and this makes it difficult to establish causality. Thus, any lessons are bound to be imperfect. Nevertheless, there are some basic propositions that can be gleaned from development along peripheral bridge sites in Cincinnati. To begin with some areas did not experience heavy growth and kept their rural character. This was true of Ohio County (Indiana)

[16] A trip from the above mentioned Census tracts in Clermont County to Cincinnati is approximately 15 miles. Further out in other sprawled areas of Clermont County the distance is 24 miles. In sprawled areas of Warren County the distance is over 20 miles. Between 1980 and 2000 Warren County's population grew 60 percent and is more than comparable to Clermont County's growth of 40 percent.

whose bridge was located 20 miles west of downtown Cincinnati.

Apart from the above exception, the impact of bridges and highways appears to be significant. First, inner city Cincinnati continued to lose population and become increasingly segregated. Second, suburbs in Cincinnati's home county (Hamilton) grew at a significant rate, especially when compared to declines in and around the urban core. These growth suburbs included tracts proximate and accessible to Cincinnati's East I 275 bridge. Not only did the population nearly double in just 20 years, but median house values and income increased by 300 percent. Third, substantial population growth occurred in the east end of the CMA, in Clermont County (adjacent to the East I 275 bridge). In the span of a few decades, Clermont County's population increased by 85%. Fourth, on the Kentucky side older cities like Covington and Newport lost absolute numbers of population and proportionate shares of wealth. Segregation of minorities and the poor were part and parcel of this evolution. Last, sprawl continued through much of Northern Kentucky and especially into Boone County. Again, the influence around the growth of the Northern Kentucky Cincinnati Airport weighed heavily on this development, but so too did the complementary influence of highways and bridges.

By all indications the placement of an easterly bridge in Jefferson County would have a similar effect to those we have seen in Cincinnati's Hamilton and Clermont Counties. Suburbs would continue to sprawl, business would continue to gravitate toward new malls on open land, and disadvantaged populations would continue to segregate the central city. Those disadvantaged groups would have least access to job opportunities.

Aside from these issues, there are very tangible costs associated with sprawl. The costs of sprawl are not unique expenses that accrue to a particular segment of the population. Rather, they often represent relative investments in one area and possible disinvestments in another. If infrastructure, housing or commercial development are undertaken in the peripheries, they may very well not be undertaken elsewhere.

Generally speaking, the costs of housing, schools, utilities, roads and travel to work are higher in sprawled developments than in compact areas. Housing costs rise in proportion to lot acreage and leapfrog development. This not only makes shelter costlier for the average buyer, but makes it impossible for inner city residents to live in proximity to rising employment opportunities.

It is also true that segregated land use means costlier parallel infrastructure for individual structures. The further away structures are from one another, the more costly the infrastructure. Lower densities also mean roads have to be extended to accommodate new populations. At approximately $1 million per centerline mile of highway this can be very expensive. Perhaps the heaviest burden borne by new communities are costs for building and supplying new schools. [17]

While the overwhelming amount of research supports the proposition that sprawl leads to higher costs, these costs will differ with areas of the country, the time in which expenses are incurred and other circumstances. Some studies show that sprawl generates additional road expenses of as little as 40 percent while others place them as high as 88 percent. Some studies show utilities as 60 percent higher while others place them as high

[17] The point is well taken when discussing sprawl. A finer point is that the costs of education are often "U" shaped. That is, school costs expensive for communities with populations of 2,500 or less as well as for districts with populations over 50,000. Optimal size is somewhere in between. See Sternlieb, George and Burchell Robert (1977) *Residential Abandonment*, New Brunswick, New Jersey., Rutgers University Center for Urban Policy Research.

as 93 percent. A number of studies are in agreement about the additional costs of schools as in the range of 95 percent higher.[18]

The costs of automobile travel and ownership are another matter. Despite the expansion of highways and bridges, travel time across the nation has increased. [19] Most research finds that sprawl creates longer travel distance and increased dependence on the automobile. Far more so than central city residents, suburban dwellers spend more time commuting to work, own more automobiles and spend a larger portion of their income on transportation.[20] In 1997 the annual cost of driving an automobile for 15,000 miles of travel came to nearly $8,000.[21] This represents a 30 percent increase between 1990 and 1997, and it continues to rise. The increase is directly proportionate to sprawl. Gasoline consumption alone climbs by 58 percent as one moves from moderately dense areas to sparsely populated ones.

For the average, middle class resident these costs are burdensome. But for the poorer resident they are prohibitive. It is little wonder that inner cities have higher rates of unemployment, higher turnover and greater poverty. Given the momentum that feeds development, the sheer economics of agglomeration mean that sprawl can drain inner city neighborhoods and send into cumulatively downward spirals of disinvestments.

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[18] Burchell, op. cit, 1998, p. 49

[19] U.S. Department of Transportation, Federal Highway Administration. (1993). Journey-to-Work Trends in the United States and its Major Metropolitan Areas1960-1990. (Table 4-13)

[20] U.S. Congress, Office of Technology Assessment. (1995). The Technological Reshaping of Metropolitan America. OTA-ETI-643. Washington, D.C.: U.S. Government Printing Office. September. p. 213)

[21] American Automobile manufactures Association, Inc. (ND). Motor Vehicles Facts and Figures. In U.S Census Bureau, Statistical Abstract of the United States, 1998. Table 1052. Available Online: www.census.gov/statab/www (05/2000).

Conclusions

Like much of the literature in the field we find a strong association in Louisville between inner city densities and the presence of poor and minority population. The further out one moves from the central city, the greater the sprawl (as measured by land consumption and densities) and the fewer numbers of poor and minority citizens. Bridges and highways also shift development and we find that an easterly bridge and connector highways will promote sprawl toward northeastern portions of the LMA. The cases related to bridge construction drawn from the Cincinnati Metropolitan Area (CMA) indicate that sprawled development continues to take place further away from downtown Cincinnati, not closer to it.

This pattern of development should be considered in light of the fact that minorities and the poor lack access to suburban development. As we show in this report these populations lack the means to commute easily by private automobile, they lack the income necessary to buy houses, and, given their own stake in the inner city, many lack the motivation to move into the suburbs. Whatever the multiple reasons for the paucity of minorities in outer suburbs, an easterly bridge is likely to shift the center of economic gravity further from these populations.

Finally, choices about bridges and highways hold benefits as well costs for an ensemble of local governments as well as individuals and business. Generally, sprawl entails higher costs for housing, roads, utilities and travel. Those costs are likely to entail investments that are geographically bounded and could channel further flows of capital away from inner city neighborhoods.

APPENDIX

Poverty Rate (Percent)

	Cincinnati Metro	Central city of: Cincinnati,OH	Suburbs
1970	10.7	17.1	7.7
1980	10.5	19.7	7.3
1990	11.6	24.3	7.7
1993 Estimated*	12.8	26.7	8.7
1995 Estimated*	10.4	21.9	7.2
1997 Estimated*	9.9	21.6	6.8
1998 Estimated*	9.6	21.6	6.6

	Louisville Metro	Central city of: Louisville,KY	Suburbs
1970	11.4	17.1	7.3
1980	11.3	19.3	7.5
1990	12.8	22.6	8.6
1993 Estimated*	15.0	27.7	9.9
1995 Estimated*	12.8	24.3	8.4
1997 Estimated*	11.2	21.0	7.5
1998 Estimated*	11.1	20.8	7.4

*Estimated poverty rates for 1993, 1995, 1997, and 1998 are derived from the Census Bureau's Small Area Income and Poverty Estimates.

Source: SOCDS Census Data: Output for Louisville, KY; SOCDS Census Data: Output for Cincinnati, OH; available at www.huduser.org.

A Note on a Northeastern Neighborhood Within Jefferson County

A third neighborhood in the Louisville Metropolitan Area was selected for examination. This area is proximate to the location of an easterly alternative bridge. This neighborhood is in the northeast quadrant of Jefferson County and I 265 runs right through its center. The neighborhood is bounded by the Ohio river on the northwest, by the Jefferson County line on the northeast, by Westport Road on the southeast, and by I 264/I 71 on the southwest. This area contained three census tracts in 1970, but because of growth, these tracts were subdivided. The area now consists of eight census tracts.

Table A 1 shows trends in population and housing growth as well as race. Similar to the Southeastern Jefferson community, this Northeastern neighborhood has seen considerable growth in both population and housing. For example, while the West Louisville neighborhood lost half its population, the Northeastern neighborhood grew by 200 percent between 1970 and 2000. In addition, while the West Louisville neighborhood lost a third of its housing stock, the northeastern neighborhood experienced a building boom. The number of housing units increased by 300 percent.

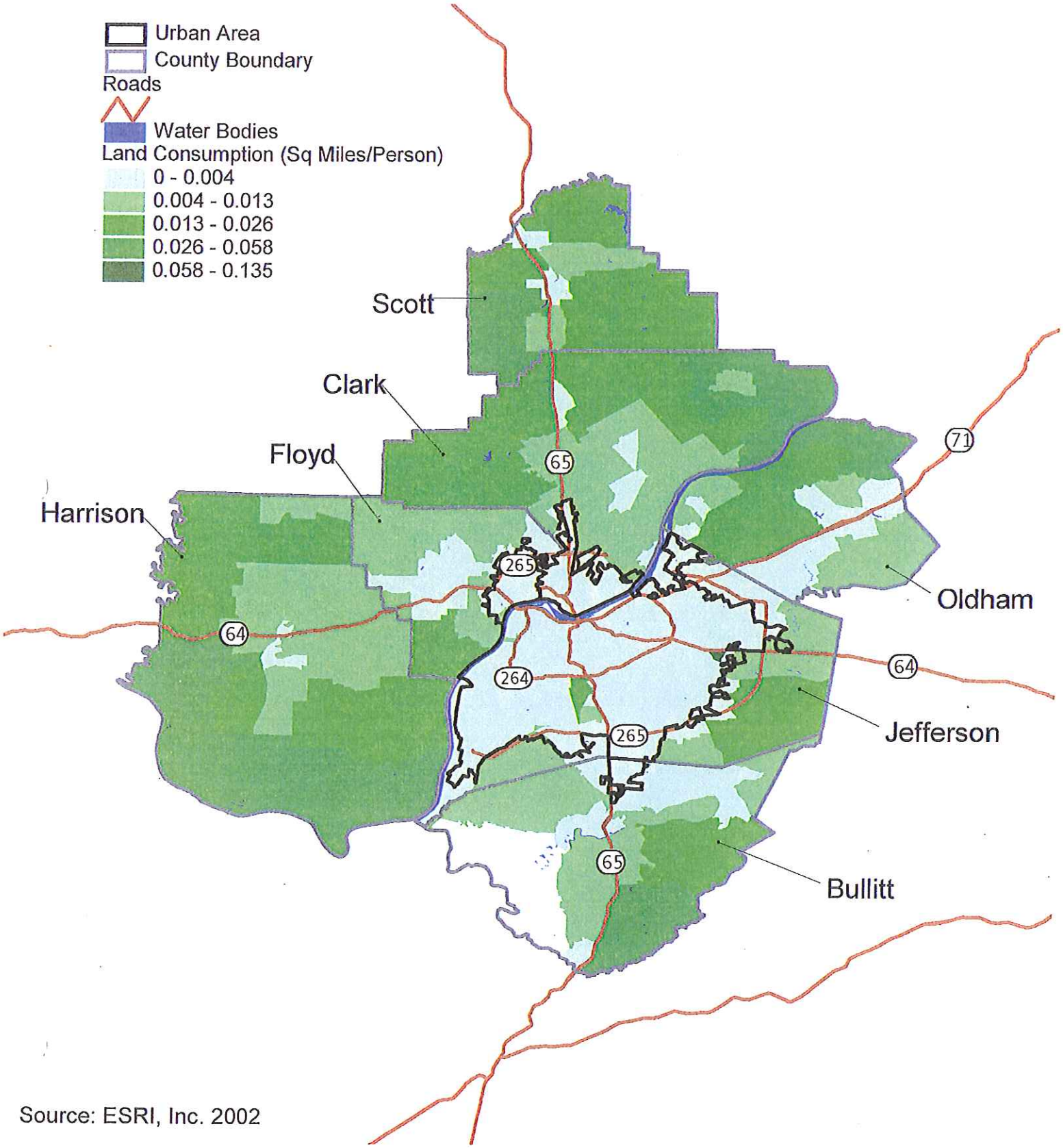
The racial pattern in Table A 1 is interesting. The minority population shows a robust growth from 4.2 percent in 1970 to 14.2 percent in 2000. This is significantly higher than the 4 percent minority population in the southeastern outer suburb neighborhood. At first blush, this is encouraging. However, closer scrutiny reveals a growing segregation in the southeastern section of this neighborhood. This section is identified as census tract 103.05. Its boundaries extend from I 71 to Westport Road and from I 265 to the county line. The minority population in this tract was 28 percent in the year 2000 compared to 9% in the remaining tracts of this Northeast neighborhood. Finally, while the minority population in the entire neighborhood is not insignificant, only 9.2 percent of the total minority population is African American. Also, the absolute numbers of African Americans are very small compared to the inner city.

Table A 1
Socioeconomic Characteristics: Northeast Jefferson Neighborhood
(thousands)

	1970	1980	1990	2000
Population	14.1	26.4	30.4	42.3
Percent Minority	4.2	9.3	9.9	14.2
Housing Units	4.1	9.2	11.9	17.2

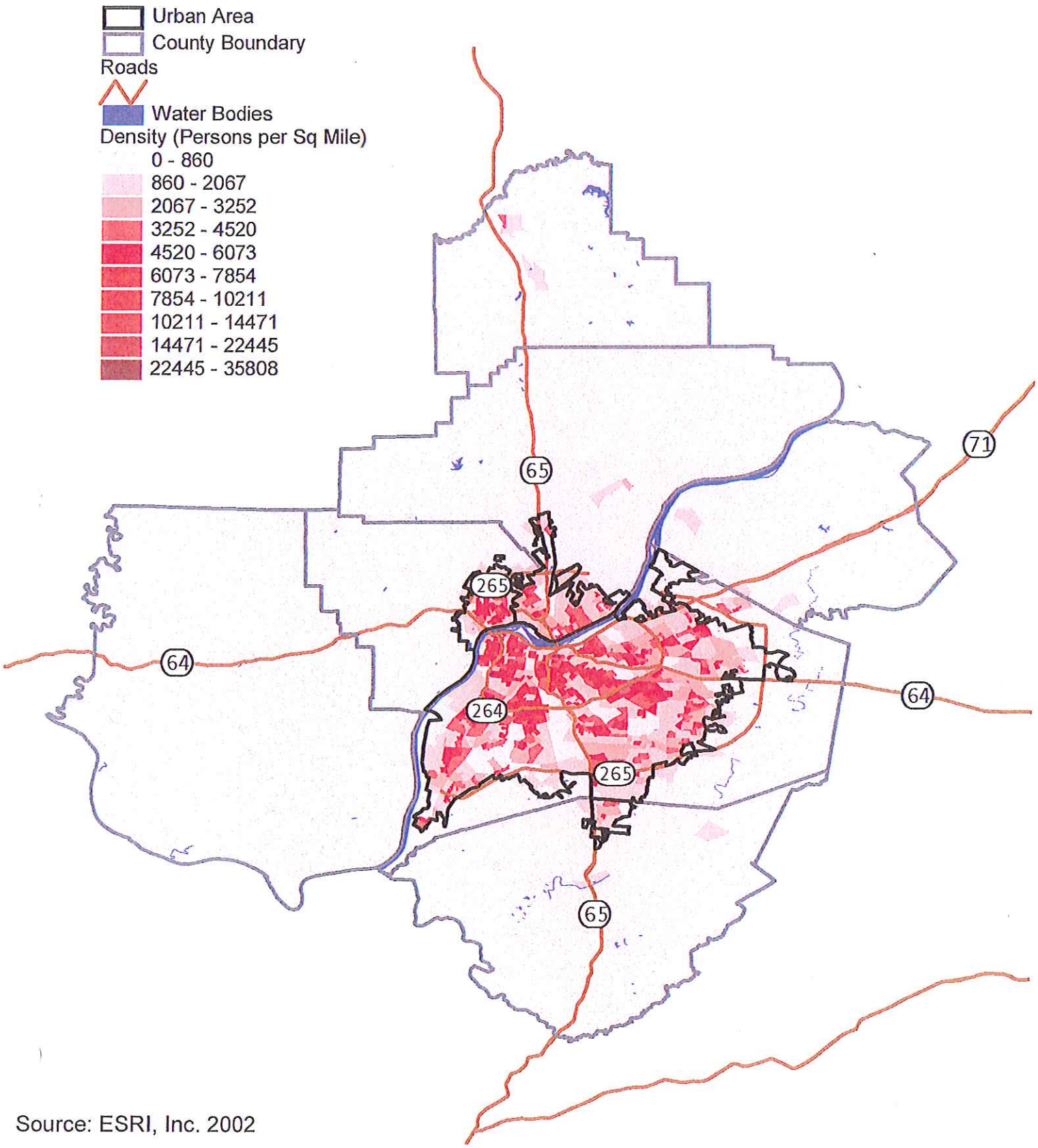
Note: Northeastern neighborhood area = 29.2 square miles. Population Density = 483 (1970) and 1,449 (2000) per square mile.
Source: Census of Population and Housing, Census Tracts, Louisville Ky – In, 1960-1990.

Figure 1
The Louisville Metropolitan Area: Land Consumption, 1990



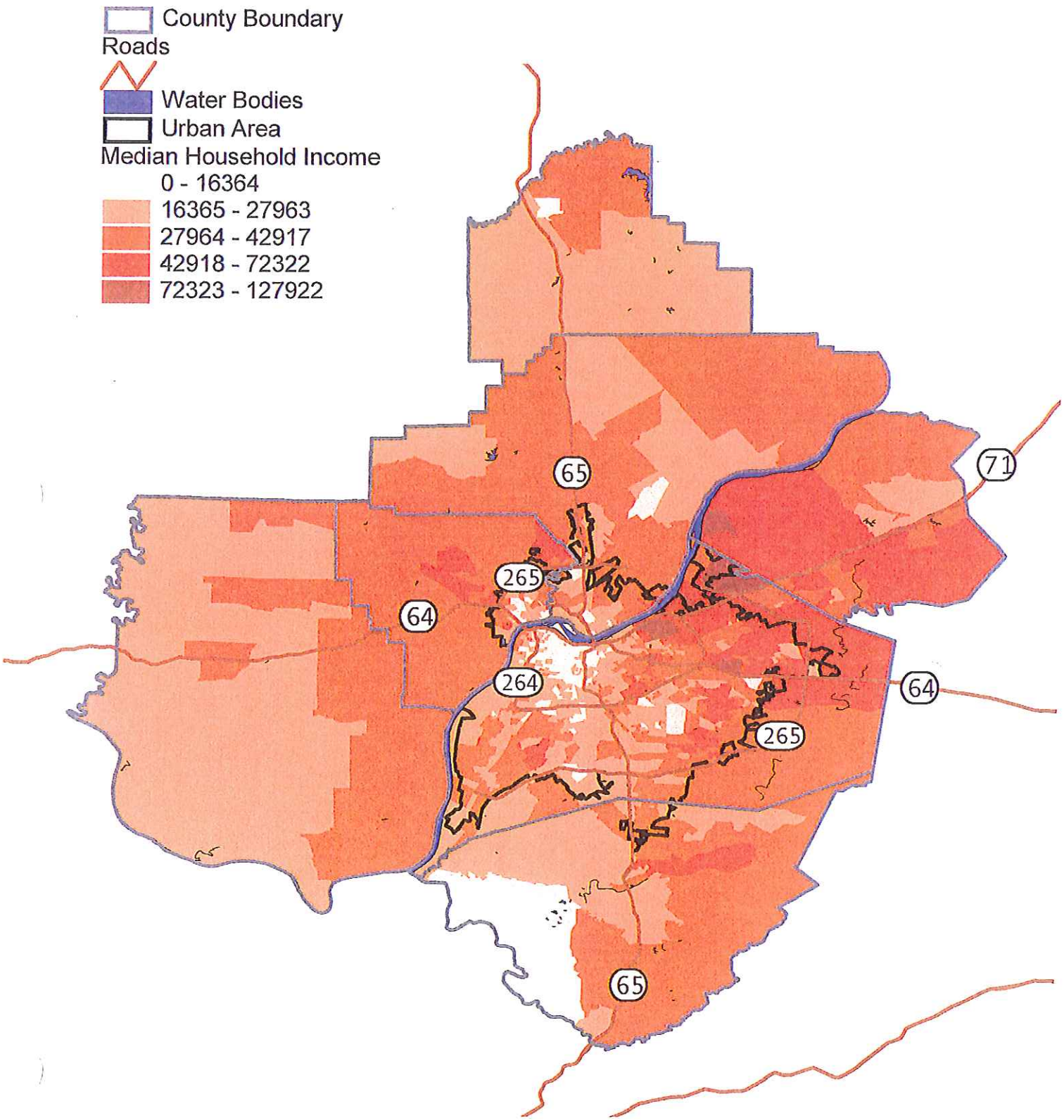
Source: ESRI, Inc. 2002

Figure 2
The Louisville Metropolitan Area: Population Density, 1990



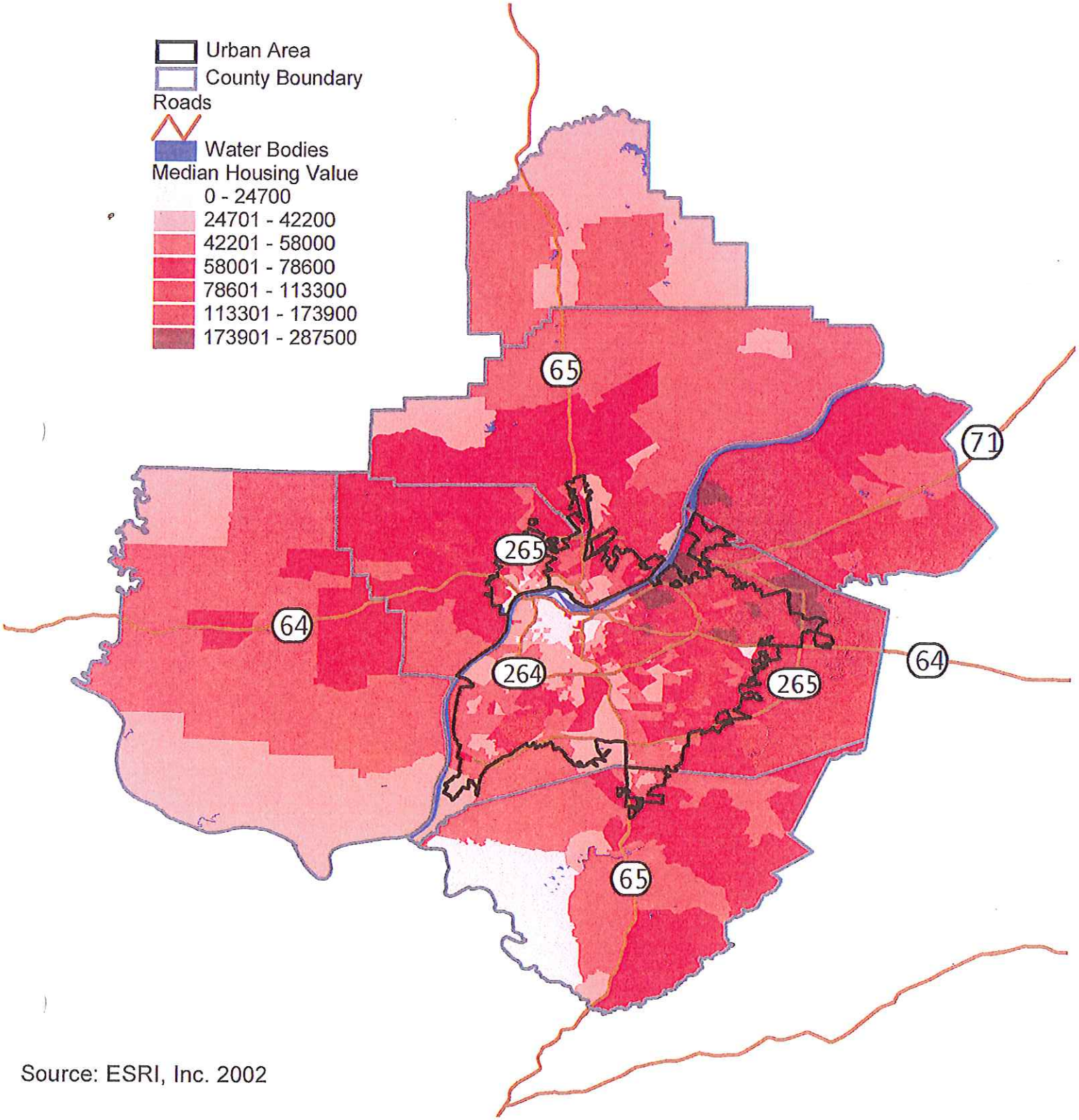
Source: ESRI, Inc. 2002

Figure 3
The Louisville Metropolitan Area: Household Income, 1990



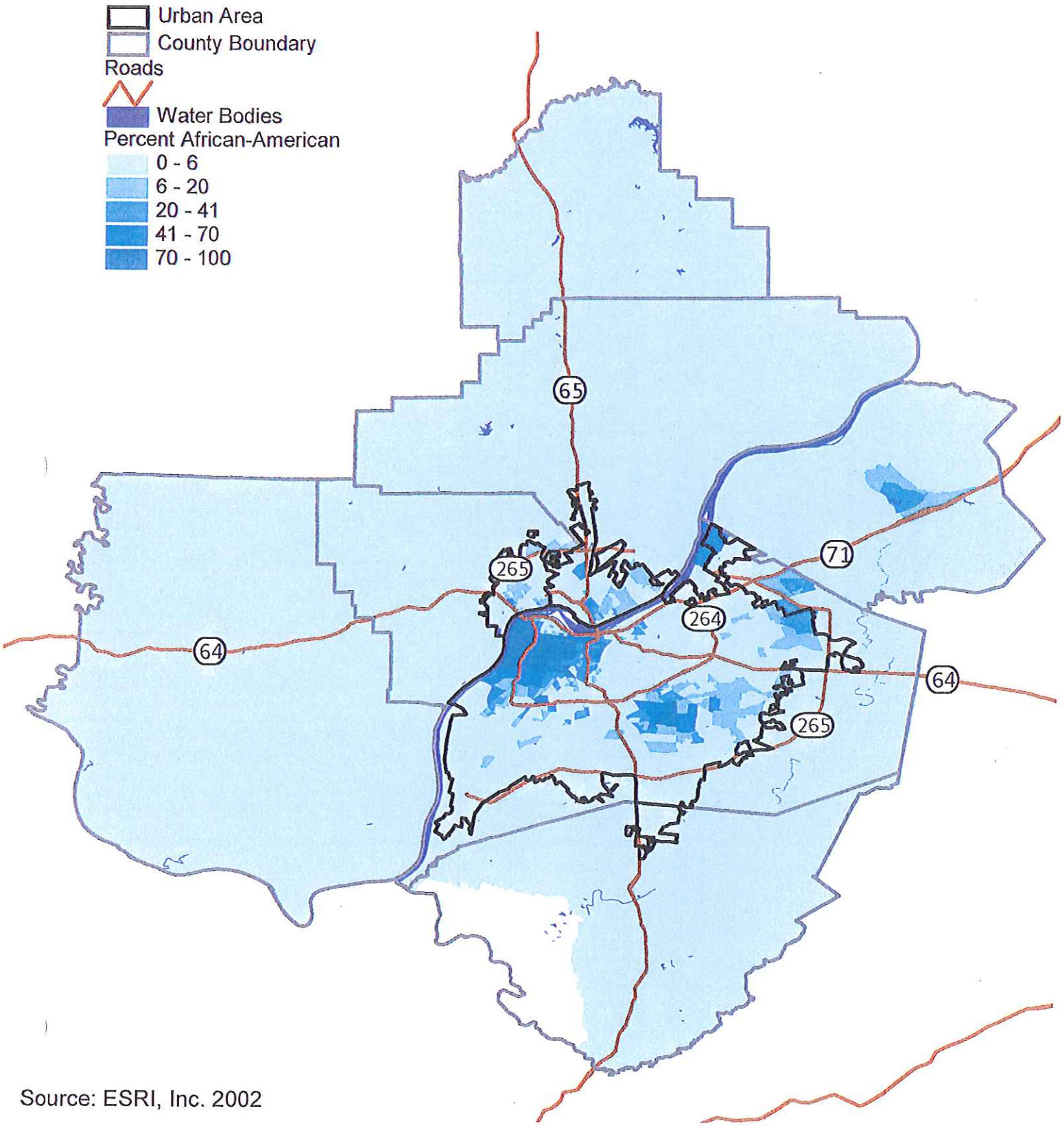
Source: ESRI, Inc. 2002

Figure 4
The Louisville Metropolitan Area: Median Housing Values, 1990



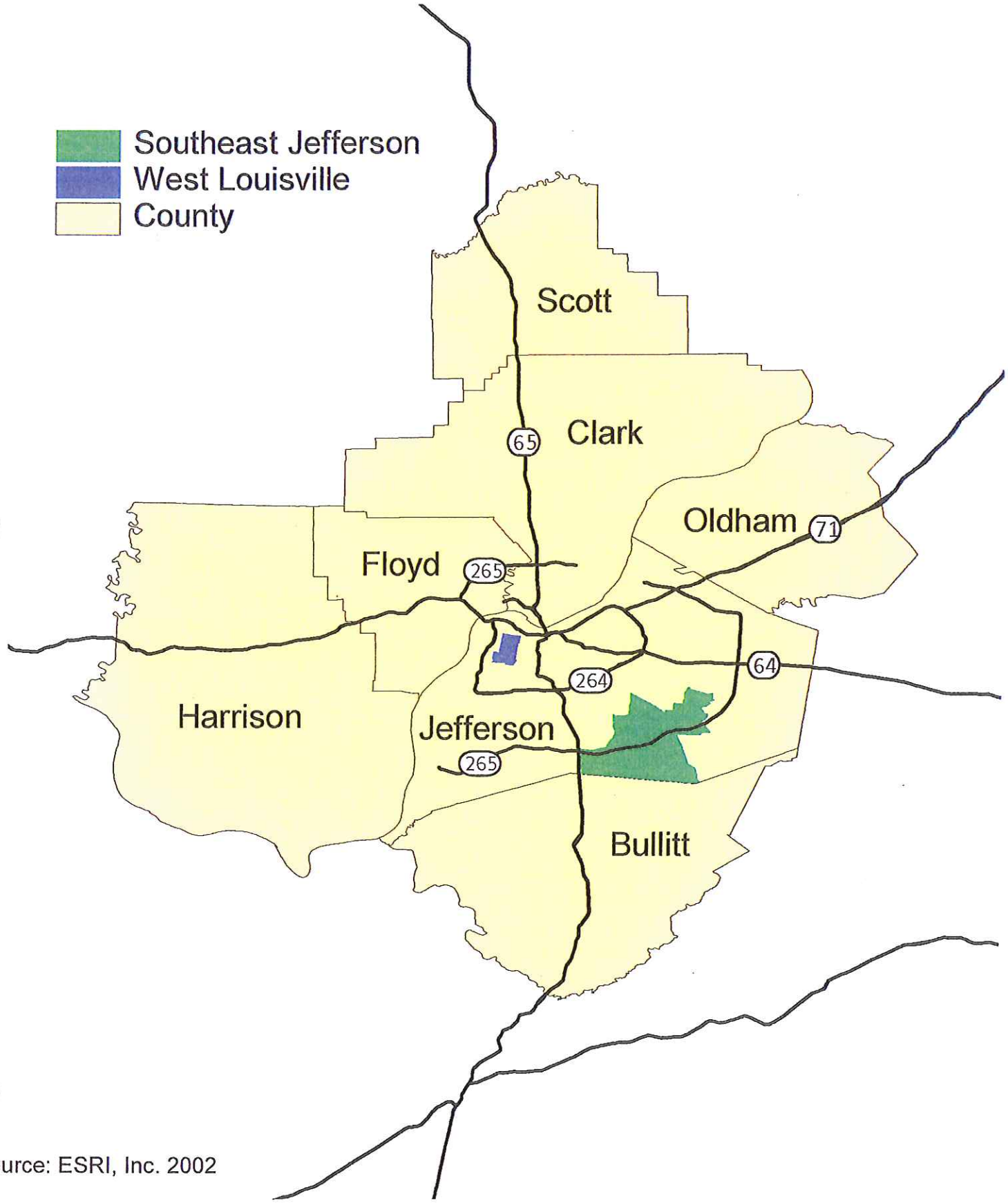
Source: ESRI, Inc. 2002

Figure 5
The Louisville Metropolitan Area: African American Population, 1990



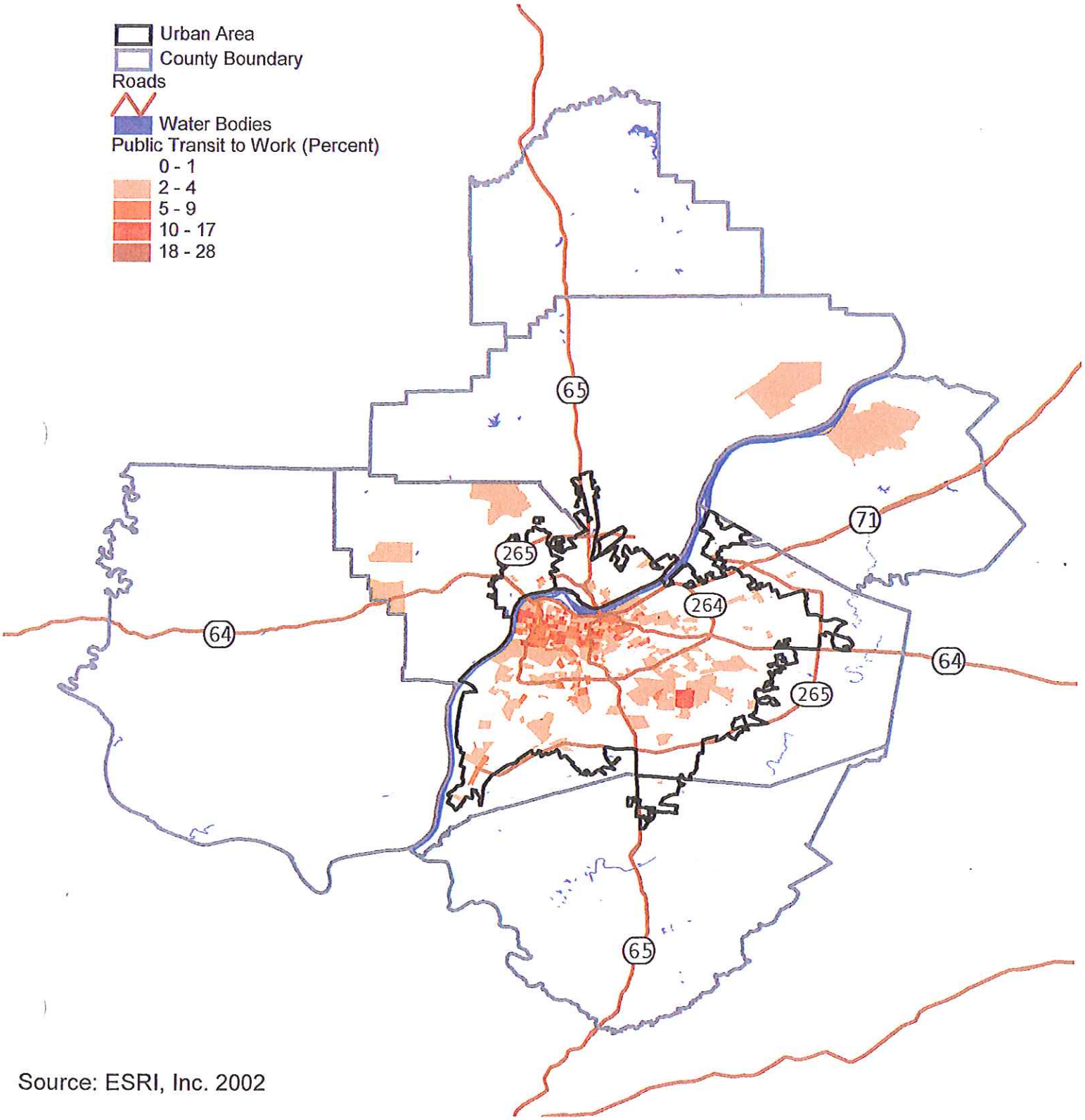
Source: ESRI, Inc. 2002

Figure 6
Two Neighborhoods: West Louisville and Southeast Jefferson



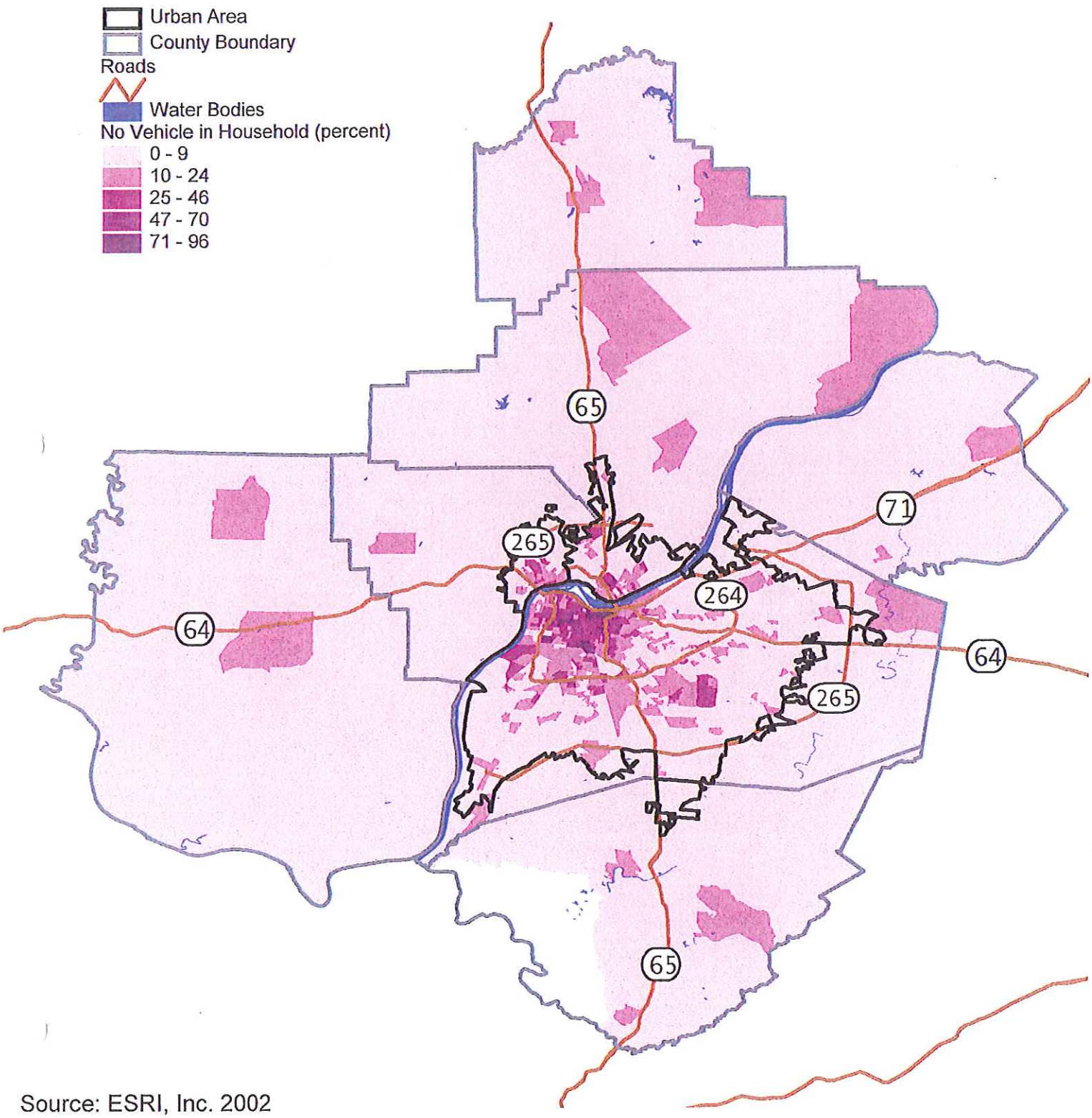
Source: ESRI, Inc. 2002

Figure 7
The Louisville Metropolitan Area: Individuals Using Public Transit, 1990



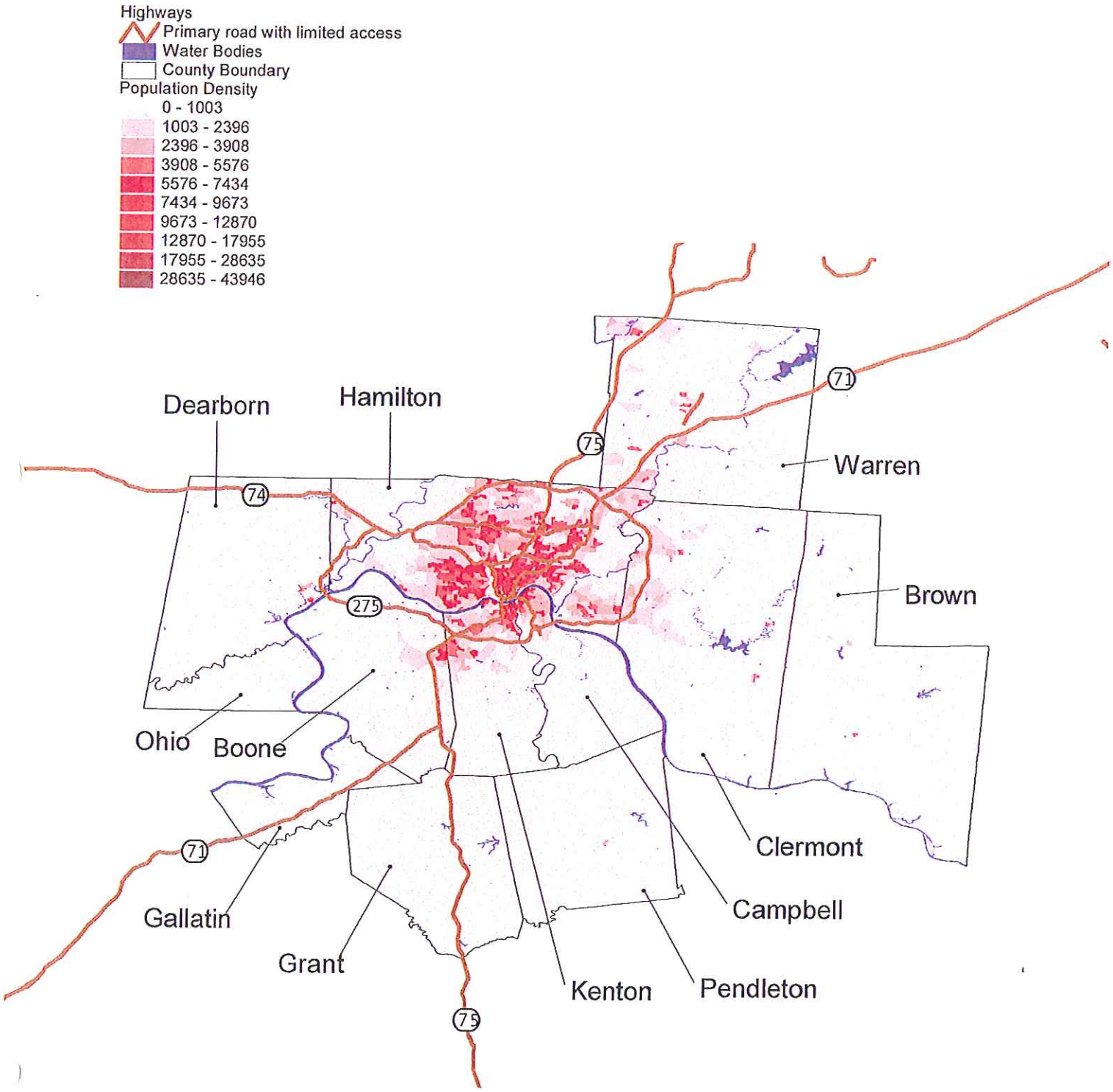
Source: ESRI, Inc. 2002

Figure 8
The Louisville Metropolitan Area: Households With No Vehicle, 1990



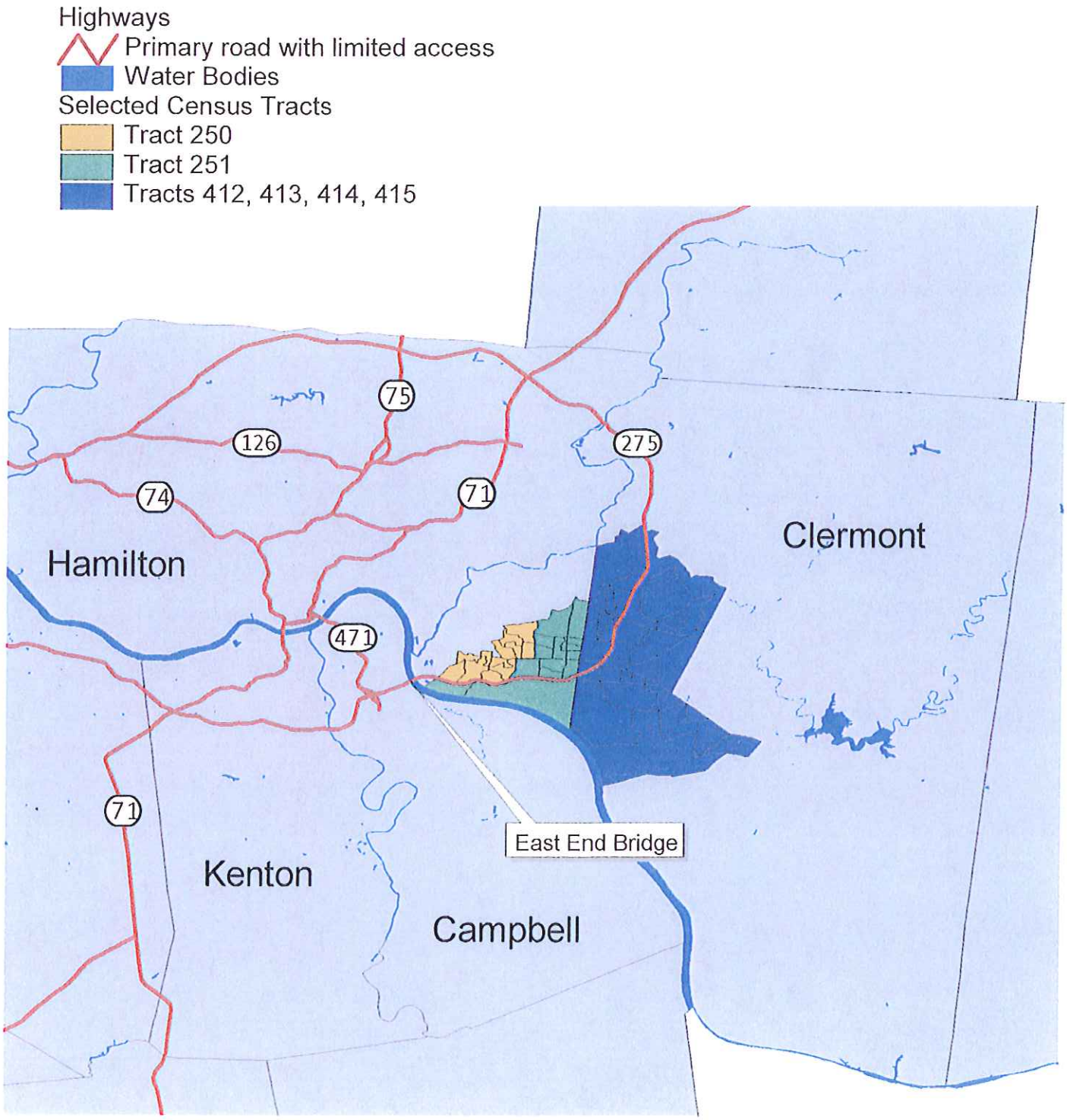
Source: ESRI, Inc. 2002

Figure 9
The Cincinnati Metropolitan Area and Ohio River Crossings, 2002



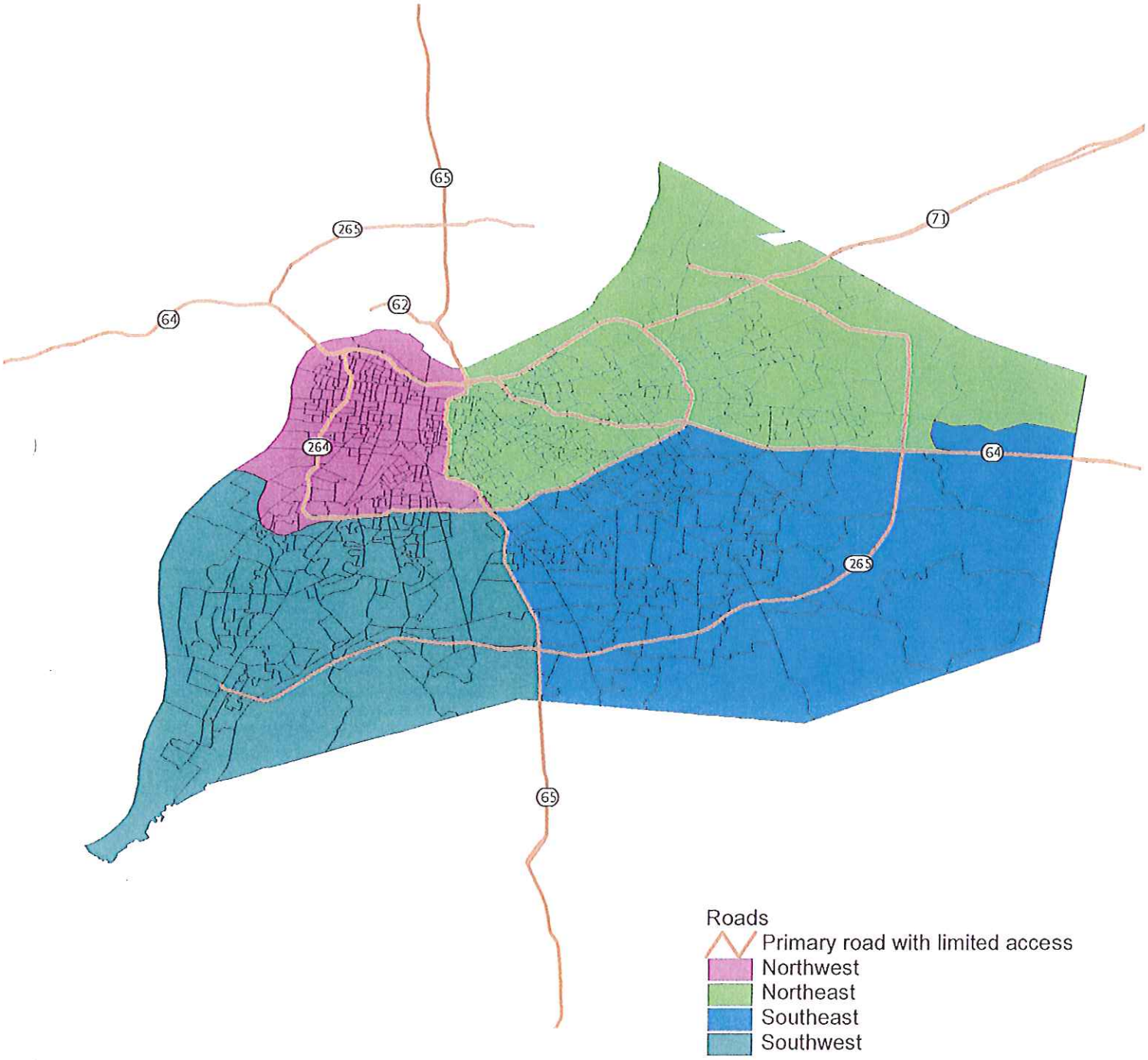
Source: ESRI, Inc. 2002

Figure 10
The Cincinnati Metropolitan Area: Selected Census Tracts



Source: ESRI, Inc. 2002

Jefferson County: Four Quadrants



Source: ESRI, Inc. 2002

STEVEN L. BESHEAR
GOVERNOR

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LINDY CASEBIER
ACTING EXECUTIVE DIRECTOR AND
STATE HISTORIC PRESERVATION OFFICER

October 14, 2011

Janice Osadczuk
Engineering Services Team Leader
Federal Highway Administration
Federal Office Building, Room 254
575 North Pennsylvania Street
Indianapolis, IN 46204

Re: Louisville-Southern Indiana Ohio River Bridges project SEIS; Section 106 Identification Workbook

Dear Ms. Osadczuk:

On September 13, 2011, the Kentucky Heritage Council, State Historic Preservation Office received the above-referenced workbook in anticipation of the September 29, 2011 Consulting Party Meeting held at the Crowne Plaza Hotel in Louisville, Kentucky. Subsequent updates were provided electronically on September 29, 2011. The workbook is organized in four sections, which include updated (albeit preliminary) eligibility (for the National Register of Historic Places, or NRHP) determinations on properties within the original Area of Potential Effect, or APE (Section 2), an evaluation of the expansion of the original APE to account for additional potential effects (Section 3), and (preliminary) eligibility determinations on properties within the 2011 expansion of the APE. It is understood that within the expanded APE effects are expected to be only indirect and will be assessed at a district or neighborhood level. Therefore, all properties over 45 years of age will be treated as eligible for the NRHP within those areas for the purposes of this project. We have reviewed the information within the workbook, and we offer comments on the following **additions to/changes from** the 2003 Final Environmental Impact Statement (FEIS) determinations:

Section 2

We concur with the new determinations in this section, which include the eligibility of the MPDF Ohio River Camps Historic District, and the change of JF-2007 (Eifler's Beach, 5209 River Road) from not eligible to a contributing resource in this district. We also concur that 6100 and 6306 Transylvania Beach, previously determined individually eligible for the NRHP, are contributing resources in this district. We likewise concur that the 20th Century Suburban Historic District is eligible.

The Jacob School Road Historic was previously determined eligible with 13 contributing properties. The update lists only 12 contributing properties. There is no additional information to explain the change. We concur that the Kerzinger House, 7314 River Road, and Stone Place Stables, 7718 Rose Island Road, previously determined not eligible, are now eligible for the NRHP.

Section 3

This section addresses changes to the APE, specifically related to the expansion of the APE to account for indirect effects due to changes in the design of the selected alternates as well as to account for the impacts of tolling. The workbook states "Because the proposed design changes are expected to fit within the original footprint of the project, additional direct effects are not anticipated." In our letter dated August 11, 2011, our office provided comments regarding the expansion of the APE to account for indirect impacts due to tolling. In the same month, a general overview of the changes to the design of the alternatives was submitted by FHWA as part of the Draft Range of Alternatives Document, but specific information about how those changes might impact vibration levels (a direct effect), particularly in regards to the excavation changes planned for the tunnel, have not yet been presented. We will reserve our comments on the potential for additional direct effects within or beyond the APE when more detailed information on the changes to the design have been submitted for our review as part of the effects phase of the 106 process.

In regards to the APE discussion that took place at the meeting, we would like to comment that we share the concerns raised by other consulting parties in regards to historic districts that are bi-sected or otherwise split by the APE. FHWA and KHC have traditionally considered historic districts as a single entity, even though the APE boundary may not reflect that fact, when evaluating effects of an undertaking. Effects must be evaluated on the district as a whole, so as to ensure that the characteristics that make the resource eligible for the National Register are fully considered relative to potential impacts.

Section 4

This section deals with the status of historic properties within the expanded APE. While all properties over 45 years of age will be treated as eligible for the NRHP for the purpose of determining indirect impacts, preliminary eligibility determinations were made for a representative sample of properties within the expanded APE. We concur with the re-evaluation of resources whose eligibility did not change and also the following new eligibility determinations:

100 E. Broadway/201 S. First Street
129 E. Broadway
102 W. Main Street
104 W. Main Street
106 W. Main Street
110 W. Main Street
111 W. Main Street
113 W. Main Street
115 W. Main Street
117 W. Main Street
119 W. Main Street
122 W. Main Street
123 W. Main Street
124 W. Main Street
301 W. Market Street
303 W. Market Street
313-315 W. Market Street
211-215 W. Muhammad Ali Blvd.
230 W. Muhammad Ali Blvd.
301-305 W. Muhammad Ali Blvd.
456 S. Second St. (not eligible)
501 S. Second Street
427 S. Third Street
438 S. Third Street
455 S. Third Street
503 S. Third Street
659 S. Third Street
2035-2039 River Road

However, it should be noted that the properties located at 105-133 W. Main have now been officially listed in the National Register of Historic Places as the Whiskey Row Historic District. We also concur that 114 W. Main Street and 652 S. Second Street are not individually eligible. However, we feel they do retain enough integrity to be considered as contributing resources within a historic district.

We thank you for providing us with the opportunity to comment on this identification of historic resources workbook. We look forward to working with you and other consulting parties on the finalization of these determinations and the effects phase of the Section 106 process. If you have questions regarding these comments, please contact Craig Potts of my staff at (502) 564-7005, ext. 123.

Sincerely,

Lindy Casebier
Acting Executive Director and
State Historic Preservation Officer

Cc: Gary Valentine (KYTC)
Amanda Abner (KYTC)
Duane Thomas (FHWA)
John Sacksteder (CTS-GEC)
Jeff Vlach (CTS-GEC)

LC:vmb