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LINDY CASEBIER
ACTING EXECUTIVE DIRECTOR AND
STATE HISTORIC PRESERVATION OFFICER

August 11, 2011

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

Re: Louisville-Southern Indiana Ohio River Bridges Project SEIS; Proposed Area of Potential Effect Modification

Dear Ms. Osadczuk:

On July 21, 2011, the Kentucky Heritage Council, State Historic Preservation Office received the above referenced Area of Potential Effect (APE) modification for review and comment. This modification is related to revisions in the Selected Alternative identified in the September 6, 2003 Record of Decision (ROD) for the Louisville-Southern Indiana Ohio River Bridges project.

The Federal Highway Administration (FHWA) has proposed two general areas in Kentucky to be included within the modified APE. These areas are in central downtown Louisville and along River Road east of downtown Louisville. Their inclusion in the APE reflects the changes to traffic patterns that are anticipated when the tolling scenario is applied to the new downtown bridge and the new east end bridge.

Central Downtown Louisville Section:

It is understood that a Traffic Diversion Analysis was carried out and resulted in an area bounded by the Ohio River to the north, Cathedral Way to the west, Guthrie Street/Abraham Flexner Way to the south and Jackson Street/East Jefferson Street/North 1st Street to the east. It is logical to assume that a segment of the traveling public will opt to exit I-65 when traveling north to utilize the Clark Memorial Bridge and thereby avoid the toll associated with the new downtown bridge. This is true of southbound traffic looking to enter I-65 from the 2nd Street corridor. The analysis indicates that more traffic will exit/enter I-65 in the vicinity of Liberty Street, making its way west to or east from 2nd Street. While it may not be supported by the Traffic Diversion Analysis presented, it seems logical to us that traffic would also utilize Chestnut and Broadway to make its way over to or from 2nd Street. We understand that these access points are further south than the existing APE in that area, but considering the availability of those two exits/on ramps in such close proximity, it seems that the potential for indirect effects is there. Specific justification concerning the lack of potential for additional noise, congestion, development pressure and cumulative effects in the vicinity of those two exits is requested.

River Road East of Downtown Section:

The expanded APE in the vicinity of the riverfront is simply a connector between the downtown Alternative Specific APE and East End Alternative Specific APE along River Road. The River Road corridor is already a popular thoroughfare to get from Prospect to downtown Louisville and vice versa, and additional traffic on the east end will likely encourage enhanced use of River Road. While we have no issue with the length of the expanded APE in the vicinity of River Road, we question the way it was delineated on either side in that it seems arbitrary. We suggest moving the boundary north to the river and south to I-71 for clarity.

Thank you for providing us with an opportunity to comment on this draft APE modification. We look forward to working with you and other consulting parties on the identification and 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, extension 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)
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