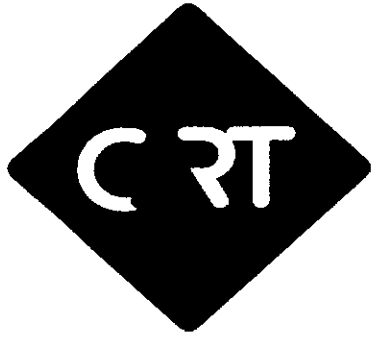




Coalition for the Advancement of Regional Transportation

PO Box 6115
Louisville, KY 40206

April 20, 2011

Ray LaHood
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Re: Request for additional analysis concerning the Supplemental Environmental Impact Statement (SEIS) for the Louisville-Southern Indiana Ohio River Bridges Project (ORBP)

Dear Secretary LaHood:

The Coalition for the Advancement of Regional Transportation (CART), an advocacy group in the Louisville area which promotes more equitable transportation options, commends the Kentucky Transportation Cabinet (KYTC) and the Indiana Department of Transportation (IDOT) for reexamining the ORBP in an attempt to better match available resource levels with the most effective transportation solution. CART, which participated in the Ohio River Major Investment Study (ORMIS), has maintained that the ORMIS failed to include a multi-modal approach because of the limited modal analysis. In 2006, CART requested that a SEIS be performed and was summarily rejected (letters enclosed).

We now request that as the SEIS is completed, consideration be given to the ways that the purpose and need of the project can be met using a variety of modes of travel. The final Environmental Impact Statement (EIS) and Record of Decision (ROD) include sections on Enhanced Bus Service, but the funding allocated for that part of the project as well as the exact details were incomplete. Given our country's economic state, concerns about energy use, and challenges to air and water quality, it seems almost incomprehensible that a multibillion dollar federally funded project would be funded without an explicit multi-modal approach. Now there are a number of even more compelling reasons to examine a multimodal approach which were not apparent or even considered during the original EIS analysis:

1. Traffic volumes on the Kennedy bridge and several major points of approach to the bridge and to Spaghetti Junction are down significantly since the ROD. The further downward effect tolls would have on volumes must be considered.
2. The significant rise in oil prices was not anticipated in the ROD.
3. The original ROD anticipated that increased TARC service would compensate for the further suburban and exurban development spurred by the new east end bridge. In fact, TARC's service and budget have been sharply cut since the ROD and no increase is anticipated, in contrast to that assertion.

The SEIS should include an assessment of the impact of oil prices on construction costs, long-term maintenance, highway budgets, and the mobility needs of the population, a significant portion of which does not have the financial or physical capability to own or operate a personal motor vehicle. An SEIS which addresses these

changed circumstances will more accurately address our needs and insure our investments are logical and sustainable.

We believe that all these significant and largely unexamined matters call for a new look at the purpose and need for this project. Our community now has the opportunity to make a wiser choice for improvements to cross-river travel and we implore your office to direct KYTC, IDOT and local officials on both sides of the river to pursue a more balanced approach, one that includes multiple modes of transportation for the ORBP. We look forward to your reply.

Sincerely,



Ron Schneider, CART Board President

Dean H. Sutton, Esq.
500 W. Jefferson, Suite 1100
Louisville, KY 40202

cc.

FHWA Kentucky and Indiana District Offices
FTA Regions IV and V

—Kentuckiana Regional Planning and Development Agency (KIPDA)
Metro Louisville Mayor Greg Fischer
New Albany Mayor Douglas England
Jeffersonville Mayor Tom Galligan
Surface Transportation Policy Project
American Public Transit Association

Enclosure



U.S. Department
of Transportation
Federal Highway
Administration

February 13, 2006

400 Seventh St., S.W.
Washington, D.C. 20590

Refer to: HEPE

Mr. David Coyte
President, Coalition for the
Advancement of Regional Transportation
P.O. Box 6115
Louisville, KY 40206-0115

Dear Mr. Coyte:

Thank you for your December 28 letter, cosigned by Dean H. Sutton, Esq., to Acting Federal Highway Administrator J. Richard Capka regarding the Louisville-Southern Indiana Ohio River Bridges project. You requested a supplemental environmental impact statement (EIS) because you believe the analysis undertaken prior to the draft EIS was inadequate and because the significant and sustained increase in oil prices "calls into question pivotal assumptions underlying the FEIS." I have been asked to reply.

A supplemental review is needed if changes in the proposed action would result in significant environmental impacts that were not evaluated in the EIS or new information or circumstances relevant to environmental concerns and bearing on the proposed action or its impacts would result in such impacts (Title 23, Code of Federal Regulations, Part 771, Subsection 771.130(a)). After considering your concerns, we have concluded that neither circumstance is true of the final EIS and Record of Decision (ROD) approved for the Louisville-Southern Indiana Ohio River Bridges project. As a result, a supplemental EIS is not warranted in this case.

I will start with your second point. The price of gas has fluctuated, up and down, considerably in recent years. However, the changes have not altered the heavy congestion on the existing bridges or even the volumes of traffic. For example, at the time of the final EIS, the I-65 Kennedy Memorial Bridge carried 133,000 vehicles a day (page 2-10). That remains the approximate traffic count today. One premise of the purpose and need for the project is that traffic volumes will increase; the final EIS projects a daily traffic volume of 178,000 vehicles on the Kennedy Bridge in 2025 if no action is taken to provide additional crossing capacity. Thus, to date, the fluctuating price of gasoline has not altered traffic volumes or prompted an increase in vehicle sharing that can be detected in traffic volumes or levels of congestion.



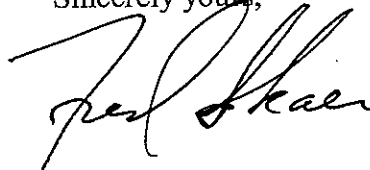
As a result, the analysis of transit alternatives, including the light-rail alternative suggested by your organization, remains valid. The transit analysis in the draft EIS was made available to the public for review and comment. The comments received were considered during preparation of the final EIS, which also was made available for public review prior to approval of the ROD. State transportation officials and the Federal Highway Administration supported the two bridges/highway alternative along with transportation management enhancements as the preferred alternative.

Based on experience with the recent price fluctuations, the conclusions in the final EIS and ROD remain valid. Congestion will worsen under any scenario in coming decades. As documented in the final EIS, no transit alternative will satisfy the purpose and need by alleviating future congestion as planned growth in population and employment centers occurs. Transit, whether in the form of expanded bus service, light rail, or some other option, may be justified, even desirable, for the area, but not as a substitute for the preferred alternative to satisfy the purpose and need of the project, namely improving cross-river mobility between Jefferson County, Kentucky, and Clark County, Indiana.

In summary, we have concluded that a supplemental EIS is not needed. If you have any questions about this conclusion, you may wish to contact our Division Office in Kentucky, which is the lead office for review and approval under the National Environmental Policy Act. The address is John C. Watts Federal Building, 330 West Broadway, Frankfort, Kentucky 40601-1922.

Through our Division Office in each State, I will provide a copy of this correspondence to State transportation officials in Indiana and Kentucky so they will be aware of your request and our conclusion.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Fred Skaer", written in a cursive style.

Fred Skaer, Director
Office of Project Development
and Environmental Review