



3951 N. Meridian, Ste. 100, Indianapolis, IN 46208
P 317.685.8800 F 317.686.4794

WWW.HECWEB.ORG

August 25, 2011

John Sacksteder, Project Manager
Community Transportation Solutions - General Engineering Consultant (CTS-GEC)
Forum Office Park III
305 N. Hurstbourne Parkway, Suite 100
Louisville, KY 40222
jsacksteder@hmbpe.com

RE: Comments on Ohio River Bridges Project – SEIS Draft Range of Alternatives Document

Mr. Sacksteder,

The Hoosier Environmental Council (“HEC”) submits the preliminary comments below, in lieu of the online form, to be considered as part of the Supplemental Environmental Impact Statement (“SEIS”) for the Ohio River Bridges Project (“ORB Project”).

Review of Purpose and Need

According to the Draft Range of Alternatives Document (“DRAD”), the SEIS process will now include a review of the ORB Project’s Purpose and Need. While HEC agrees that this review is necessary due to the prolonged delays and substantial changes, the proposed review is structured to reaffirm the findings of the 2003 FEIS and, therefore, fundamentally flawed.

The DRAD states that the original purpose of the project was to improve cross-river mobility between Jefferson County, Kentucky and Clark County, Indiana. It then identifies five specific factors that will be used to reassess the purpose and need for this project, including:

- Inefficient mobility for existing and planned growth in population and employment in the Downtown area and in eastern Jefferson and southeastern Clark Counties;
- Traffic congestion on the Kennedy Bridge and within the Kennedy Interchange;
- Traffic safety problems within the Kennedy Interchange and on the Kennedy Bridge and its approaches;
- Inadequate cross-river transportation system linkage and freeway rerouting opportunities in the eastern portion of the Louisville Metropolitan Area;
- Locally approved transportation plans that call for two new bridges across the Ohio River and the reconstruction of the Kennedy Interchange.

These factors inexplicably link the Downtown Bridge/Interchange project and the East End Bridge project without justification. There is no explanation as to why or how the inefficient mobility of the downtown area is so closely related to eastern Jefferson and southeastern Clark Counties as to be considered together. Similarly, no justification is

provided for why “freeway rerouting opportunities in the eastern portion of the Louisville Metropolitan Area” must be considered concurrently with the downtown project. Finally, the call for two new bridges in a local transportation plan does not necessitate joining those two bridges into a single project.

Barring some reasonable justification for joining the projects, they should be separated and reevaluated individually to determine whether each project has sufficient individual utility to justify pursuing.

Process and Methodology for Evaluating the Range of Alternatives

Just as the factors for evaluating the Purpose and Need predetermine the outcome of the process, so do the proposed criteria for evaluating the range of alternatives that satisfy the Purpose and Need.

One of the criteria is to “Improve System Linkage and Freeway Re-Routing Opportunities.” An alternative only meets this criterion if it “completes the eastern cross-river transportation system.” There is no specified link between this criterion and the Downtown Bridge. There is no requirement that the “Freeway Re-routing Opportunities” be feasible options for I-65, for instance. No metrics are provided for what would be considered a viable re-routing opportunity. Seemingly, the only purpose of this criterion is to ensure that some variation of the East End Bridge be built, regardless of its impact on downtown traffic flow or independent utility.

East End Bridge

Rather than pursuing the nominal cost savings achieved through eliminating the bicycle/pedestrian lane on the new Downtown Bridge, HEC urges reconsideration of including the East End Bridge in the project. The Kentucky and Indiana Planning and Development Agency (“KIPDA”) traffic projections do not justify the extraordinarily high financial cost for the East End Bridge.

Over the next twenty years, the projected number of daily trips from Eastern Clark County to Eastern Jefferson/Oldham Counties is only 41,000 under the no-action alternative.¹ In the same period, the daily trips over the Kennedy and Clark Memorial Bridges will grow to 180,000.² In spite of the difference in demonstrable need, the East End Bridge accounts for nearly half of the total project cost (\$1.35 billion for the 2011 Modified Alternative).

Eliminating the East End Bridge from the project would allow for greater investment in making the Downtown Bridge a truly multi-modal facility that serves all types of cross-river traffic. The savings could also be applied to the other mounting infrastructure needs in both states.

Alternative Concepts

The DRAD states that the various Travel Demand Management (“TDM”), Transportation System Management (“TSM”), and Mass Transit (“MT”) alternatives would be evaluated

¹ Louisville-Southern Indiana Ohio River Bridges Project SEIS Purpose and Need White Paper, Table 4.

² Id., Table 2.

separately, and to a limited extent, jointly as part of the Transportation Management ("TM") alternative. The FEIS only considered one TM alternative that combined various TDM, TSM, and MT alternatives. Given the high cost of the Bridge/Highway alternatives, HEC recommends that more TM alternatives be developed and evaluated. Specifically, we recommend that the TM alternatives include options with combinations of rail transit, dedicated bus and high occupancy vehicle lanes, and pedestrian/bicycle facilities on the downtown bridge. Hybrid alternatives that include aspects of both TM and Existing System Improvements should also be developed and evaluated as viable substitutes for the Bridge/Highway Only alternatives.

Thank you for the opportunity to contribute to the development of the Supplemental EIS.

Submitted by:

Tim Maloney, *Senior Policy Director*
Steven Meyer, *Land Use Policy Coordinator*
Hoosier Environmental Council
3951 N. Meridian St., Suite 100
Indianapolis, IN 46208
(317) 685-8800