



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



August 23, 2011

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

Federal Agency: Federal Highway Administration ("FHWA")

Re: "Louisville-Southern Indiana Ohio River Bridges/Project Supplemental Environmental Impact Statement/DRAFT Range of Alternatives Document/August 5, 2011," (HDA-IN; INDOT Des. Nos. 0201294, 0300798, 0201296, 0201297; DHPA No. 1774)

Dear Ms. Osadczyk:

Pursuant to the National Environmental Policy Act of 1969, as amended (42 U.S.C. § 4321, *et seq.*) and 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 ("Indiana SHPO") has reviewed the draft document under your cover letter of August 10, 2011, which we received on August 10, regarding the aforementioned project in Clark County, Indiana and Jefferson County, Kentucky.

We noticed that, at the back of the "DRAFT Range of Alternatives Document," the tables comparing the selected alternative to the modified alternative indicate for both Section 5 (the East End River Bridge) and Section 6 (the Indiana Approach to the East End Bridge) seem to indicate that the "2003 EIS MOA commitments [will be] addressed." We are aware that FHWA intends to propose amending the existing Section 106 MOA with regard to certain properties in the vicinity of Section 6 that are no longer eligible for inclusion in the National Register of Historic Places, but we were under the impression that existing MOA commitments otherwise would be honored. Consequently, we would appreciate clarification about why statements regarding EIS and MOA commitments similar to those in the tables for Section 5 and Section 6 are not also found in the tables for Section 2 (Downtown River Bridge) and Section 3 (Indiana Approach to Downtown Bridge).

The table for Section 2 indicates that the modified alternative would substitute steel plate girders for the selected alternative's steel tub girders in the approach spans. We recall that there previously had been consultation, either with the Section 106 consulting parties or with the Indiana Historic Preservation Advisory Team, about lighting, about preventing birds from roosting under the Indiana approach spans, and about other, pedestrian-friendly measures that could be implemented beneath the Indiana approach spans, and we would suggest that those issues might need to be revisited if the modified alternative were to be chosen.

We recall that previous consultation occurred, as well, regarding the physical, visual, and access-related effects of the various ramps in the vicinity of the George Rogers Clark (US 31) Bridge and the Ohio Falls Car and Locomotive Company Historic District. It is not clear at this time how the changes to the ramps proposed in the modified alternative would alter those effects, but we would suggest that if the modified alternative were to be chosen, there should be further consultation about how those effects might differ.

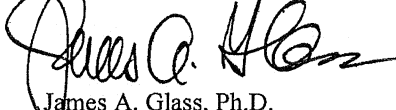
Otherwise, we have no concerns about the range of alternatives proposed in the August 5, 2011 draft document.

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

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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:jlc

cmc: MaryAnn Naber, Federal Highway Administration, Washington, D.C.
Janice Osadcuk, Indiana Division, Federal Highway Administration
Duane Thomas, P.E., Kentucky Division, Federal Highway Administration
Michelle Allen, Indiana Division, Federal Highway Administration
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
Craig Potts, Kentucky Heritage Council
John Sacksteder, P.E., Community Transportation Solutions-General Engineering Consultant
Jeffrey Vlach, Beam, Longest & Neff, L.L.C.
John Mettelle, Wilbur Smith Associates
David Kroll, Ratio Architects, Inc.
Kevin Senninger, Ratio Architects, Inc.