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July 6, 2011

Janice Osadcuk
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: Draft "Louisville-Southern Indiana Ohio River Bridges Project SEIS Purpose and Need White Paper" (HDA-IN; INDOT Des. Nos. 0201294, 0300798, 0201296, 0201297; DHPA No. 1774)

Dear Ms. Osadcuk:

Pursuant to the National Environmental Policy Act of 1969 ("NEPA"), as amended (42 U.S.C. § 4321, *et seq.*) and 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 ("Indiana SHPO") has reviewed the paper that accompanied your cover letter dated June 3, 2011 and received on June 6, regarding the aforementioned project in Clark County, Indiana and Jefferson County, Kentucky.

We do not have any questions about the "SEIS Purpose and Need White Paper," but we wish to make a few observations about the implications of the projections in that document of 2030 No Action Alternative river crossing demand as a percentage of capacity of the Sherman Minton Bridge (I-65), Clark Memorial Bridge (US 31), and Kennedy Memorial Bridge (I-65) with respect to the proposed tolling of the Kennedy Memorial Bridge, the proposed Downtown Bridge, and the proposed East End Bridge. If the demand for the Sherman Minton Bridge will be at 104% of capacity in 2030 under the No Action Alternative, then it seems likely that, to whatever extent tolling would encourage the use of the Sherman Minton instead of the Kennedy Memorial and proposed Downtown bridges, the demand for the Sherman Minton could be well in excess of 100%, if tolling is implemented. Similarly, if demand for the Clark Memorial Bridge will be at 83% of capacity in 2030 under the No Action Alternative, then it appears likely that tolling could increase the demand for that bridge to near capacity, or possibly in excess of capacity, by 2030.

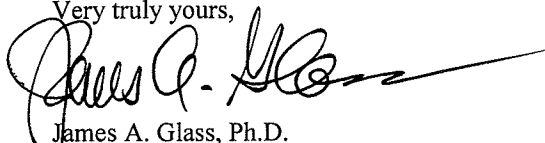
These outcomes of tolling, which we have suggested may be foreseeable, underscore the importance of giving serious consideration to whether the projections that ultimately result from the pending traffic modeling and diversion studies warrant expansion of the NEPA study areas and the Section 106 areas of potential effects that were established in 2003. If tolling of the Kennedy Memorial and proposed Downtown bridges does result in the diversion of a significant volume of traffic onto the Sherman Minton and Clark Memorial bridges, then it seems likely that not only those bridges and the highways they carry, I-64 and US 31, respectively, but also I-265 and local roads and city streets that serve as feeders of those highways, will see increased traffic. It seems to us that increased traffic on local roads and city streets potentially could have at least as great an impact on historic properties as would the increase in traffic on the Sherman Minton Bridge and I-64 and I-265 and on the Clark Memorial Bridge and US 31.

If you have questions about our comments here or about issues pertaining to buildings or structures, then please contact John Carr at (317) 233-1949 or jcarr@dnr.IN.gov. Questions about archaeological issues should be directed to Dr. Rick

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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:jlc

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