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January 9, 2012

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RE: Comments on Ohio River Bridges Project Supplemental Draft Environmental Impact Statement (SDEIS)

Mr. Sacksteder,

The Hoosier Environmental Council ("HEC") submits the following comments, in lieu of the online form, on the Supplemental Draft Environmental Impact Statement ("SDEIS") for the Ohio River Bridges Project ("ORB Project").

Purpose and Need

As we noted in comments on the Draft Range of Alternatives Document (DRAD), the review of the purpose and need for the ORB project was incomplete and flawed, and merely served to reaffirm the findings of the 2003 FEIS.

The five specific factors used to reassess the purpose and need for this project continue to 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.

As we noted in our comments on the DRAD, without 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.

Evaluation of Alternatives

The SDEIS dismisses without adequate consideration other alternatives which could reasonably achieve the project's goals. The only significant change in the range of

B.3

alternatives from the FEIS to the SDEIS is to add a modified two bridge alternative as the new preferred alternative. Other feasible alternatives that would provide cross-river mobility at less cost and impact include a combination of one new bridge plus transportation management (TM) components and/or mass transit. Given the funding challenges for this project, the SEIS process provided an ideal opportunity to revisit alternatives that were not sufficiently considered in the original EIS.

C.36

Specifically, we recommend that other alternatives be considered which include 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.

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.

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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. In the same period, the daily trips over the Kennedy and Clark Memorial Bridges will grow to 180,000. In spite of the difference in demonstrable need, the East End Bridge accounts for nearly half of the total project cost (\$1.35 billion out of \$2.9 billion for the 2011 Modified Selected 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.

Poor Performance of Preferred Alternative in Light of Project Cost and Financing Concerns

The SDEIS discloses that the preferred alternative performs poorly on a number of important outcomes.

- Permanent job creation: completion of the preferred alternative will result in a loss of 78 total jobs in the Louisville-Southern Indiana metropolitan area. See table 5.1-11.
- Level of service on existing and new bridges: completion of two new bridges will still leave the I-65 bridges at a low level of service— LOS E; the new east end bridge will be at LOS D from day one; the Clark Memorial bridge will remain at the same level of service – LOS C; and the Sherman Minton bridge will remain at a low level of service—LOS E.

C.18

- Traffic as percent of bridge capacity: the preferred alternative will result in the Sherman Minton bridge operating at 113% of capacity by 2030; and the Clark Memorial bridge at 117% of capacity. These percentages are higher than the no-action alternative for these bridges.

Given the project's poor performance on several key outcomes, and its substantial cost -- \$2.9 billion -- which must be partially funded by tolling, other more cost effective alternatives should be considered for this project.

Thank you for the opportunity to comment on the Supplemental Draft EIS.

Submitted by:

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