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RE: Preliminary Comment on Ohio River Bridges Project – Supplemental EIS

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.

Timeliness of the Supplemental EIS

The Final Environmental Impact Statement ("FEIS") and subsequent Record of Decision ("ROD") were issued for this project in 2003. In the intervening years, the lack of available funding and repeated design changes have prevented construction on any portion of the project from beginning.

The 2011 Modified Alternative has the potential to drastically change the scope of the project from the Selected Alternative as determined in 2003. The Modified alternative will reduce the cross-river vehicle lanes by 1/3rd (sharply reducing capacity), eliminate the dedicated bicycle/pedestrian lane on the Kennedy Bridge, and partially finance the project through the addition of bridge tolls.

In spite of the potentially drastic changes, the Supplemental EIS process does not require a review of the original scoping decision. In light of the substantial modifications under consideration, together with the unusually long period of time that has elapsed since the 2003 decision and the funding uncertainty, the original scoping decision should be revisited by reopening the EIS process from the beginning.

Lack of Transit

The Purpose and Need White Paper justifies the project need through reference to the projected growth in the number of daily river crossings (as a percent of bridge capacity). However, neither the 2003 Selected Alternative nor the 2011 Modified Alternative improves cross-river transit service as a method for controlling the rise in demand.

In order to slow the growth in the number of daily vehicle crossings, the Ohio River Bridges Project should include alternative methods to cross the river other than by motor vehicle.

Dedicated bus lanes, bus rapid transit (BRT), and light rail are all options for reducing commuter congestion as well as improving safety, mobility, and transportation choice.

Bicycle/Pedestrian Lane

The 2011 Modified Alternative does not include a dedicated bicycle/pedestrian lane on the Downtown Bridge. It also does not provide for North/South access (for any mode) on the East side of the Kennedy Interchange. These design features will create safety problems, impede mobility, and fail to provide adequate transportation system linkage.

The current cross-river access for bicyclists and pedestrians is the Clark Memorial Bridge. While U.S. 31 does provide a direct route from downtown Jeffersonville to downtown Louisville, the existing sidewalks are narrow and in relatively poor condition. A dedicated and separated bicycle/pedestrian lane on the new Downtown Bridge would be a safer route for non-vehicle traffic.

The Big Four Bridge is cited as an alternative to the bicycle/pedestrian traffic that will not be served under the 2011 Modified Alternative plan. However, the Indiana portion of the Big Four Bridge project is not fully funded and there is no indication when or if it will be. Additionally, the Big Four is far less convenient for pedestrian traffic than the Kennedy Bridge would be. Crossing the river via the Big Four lengthens the route significantly for the most common pedestrian destinations. If the 2011 Modified Alternative is pursued, there will be no North/South access to downtown without traveling west, under the Downtown/Kennedy Bridge, to the nearest underpass of the Kennedy Interchange. Obviously, this route is unappealing and potentially dangerous for bicyclists and pedestrians.

The Big Four Bridge is not part of the Ohio River Bridges Project and should not be considered as an alternative to the bicycle/pedestrian access that would otherwise be offered via the Downtown Bridge.

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).

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

² Id., Table 2.

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.

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

Submitted by:

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