



U.S. Department
of Transportation
**Federal Highway
Administration**

Ohio Division
March 15, 2018

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Columbus, OH 43215
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In Reply Refer To:
HDA-OH

Jerry Wray
Director
Ohio Department of Transportation
1980 West Broad Street
Columbus, OH 43223

Subject: Revised FHWA Re-Evaluation of Brent Spence Bridge
Replacement/Rehabilitation Project

Dear Director Wray:

The Federal Highway Administration has revised the re-evaluation of the Environmental Assessment (EA) for the Brent Spence Bridge Replacement/Rehabilitation Project from February 5 2018. Ohio Department of Transportation Project Identification of HAM 89068, and the Kentucky Transportation Cabinet Project Identification of 6-17. The purpose of the reevaluation is unchanged and is as follows:

- o Document and consider ongoing project development activities within the corridor for NEPA implications,
- o Meet the required time frames to maintain a NEPA decision as valid.

This revised reevaluation has been coordinated with the Ohio Department of Transportation and the Kentucky Transportation Cabinet. The revised reevaluation is enclosed.

If you have questions or concerns, please call or e-mail either Mr. Noel F. Mehlo Jr., Planning & Environmental Specialist at (614) 280-6841 or noel.mehlo@dot.gov or Mr. Adam B. Johnson, Major Projects Engineer at (614) 280-6843 or abjohnson@dot.gov .

Sincerely,

For: Laura S. Leffler
Division Administrator

Enclosure(s)

**The Brent Bridge Replacement/Rehabilitation Project
KYTC Project Item No. 6-17
ODOT PID 89068
Kenton County, Kentucky and Hamilton County, Ohio
Reevaluation 2
March 2, 2018**

On August 9, 2012, the Federal Highway Administration (FHWA) issued a Finding of No Significant Impact (FONSI) for the Brent Spence Bridge Project. Since that time, the Ohio Department of Transportation (ODOT) and the Kentucky Transportation Cabinet (KYTC) continued with project development.

On February 2, 2015, FHWA prepared and approved a Reevaluation of that decision and determined that the existing FONSI dated August 9, 2012 remained valid based on ongoing project development and questions surrounding project funding.

Discussions continue between the States on ways to fund the total project as presented in the original FONSI, estimated at \$2.4 - \$2.9 billion. The discussions determined that tolling is an option that needs to be considered. That option, however, was not considered in the original FONSI.

Purpose of the Reevaluation

A Reevaluation is required per 23 CFR 771.129 when changes have occurred between the previous NEPA approval and any request for additional federal action. The Reevaluation takes place after the FONSI has been approved and prior to the advancement to the next project step (stage or phase). Major steps to advance the action are defined as:

- authority to undertake final design,
- authority to acquire a significant portion of the right-of-way, or
- approval of the plans, specifications and estimates.

FHWA may require a written evaluation of the FONSI before these approvals may be granted.

The purpose of the Reevaluation is to determine the validity of the previous NEPA decision, and provides evidence in determining if the preparation of a new CE, EA or EIS is necessary to advance the project to the next stage.

Proposed Project

The Kentucky Transportation Cabinet (KYTC) and the Ohio Department of Transportation (ODOT) plan to improve a 7.8-mile segment of Interstate-75 (I-75) within the Commonwealth of Kentucky (state line mile 186. 7) and the State of Ohio (state line mile 2. 7). The southern limit of the project is 5,000 feet south of the midpoint of the Dixie Highway Interchange on I-71/I-75 in Fort Wright, south of Covington, Kentucky. The

northern limit of the project is 1,500 feet north of the midpoint of the Western Hills Viaduct Interchange on I-75 in Cincinnati, Ohio. The eastern and western limits of the study area generally follow the existing alignment of I-75.

I-75 within the Greater Cincinnati/Northern Kentucky region is a major thoroughfare for local and regional mobility. Locally, it connects to I-71, I-74 and US Route 50. The Brent Spence Bridge provides an interstate connection over the Ohio River and carries both I-71 and I-75 traffic. The bridge also facilitates local travel by providing access to downtown Cincinnati, Hamilton County, Ohio and Covington, Kenton County, Kentucky. Safety, congestion and geometric problems exist on the structure and its approaches. The Brent Spence Bridge, which opened to traffic in 1963, was designed to carry 80,000 vehicles per day. Currently, approximately 160,000 vehicles per day use the Brent Spence Bridge and traffic volumes are projected to increase to approximately 233,000 vehicles per day in 2035.

The I-75 corridor within the Greater Cincinnati/Northern Kentucky region is experiencing problems, which threaten the overall efficiency and flexibility of this vital trade corridor. These problems include, but are not limited to, growing demand and congestion, land use pressures, environmental concerns, inadequate safety margins, and maintaining linkage in key mobility, trade, and national defense highways. The purpose of the project is to improve the operational characteristics within the I-75 corridor for both local and through traffic. In the Greater Cincinnati/Northern Kentucky region, the I-75 corridor suffers from congestion and safety related issues because of inadequate capacity to accommodate current traffic demand. The objectives of this project are to:

- improve traffic flow and level of service,
- improve safety,
- correct geometric deficiencies, and
- maintain connections to key regional and national transportation corridors.

The I-75 corridor is a major north-south transportation corridor and is one of the busiest freight movement (trucking) routes and as such is important link for the local, regional and national economies. The project is included in a conforming Transportation Plan in accordance with the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A legacy for Users (SAFETEA-LU).

In December 2017, KYTC released the Brent Spence Strategic Corridor Study that analyzed multiple options to relieve congestion and improve cross-river mobility in the Greater Cincinnati and Northern Kentucky region by by-passing the Brent Spence study area. The study considered five concepts to ease congestion and divert traffic from the Brent Spence Bridge and five other crossings. The study confirmed that the Brent Spence Bridge Replacement/ Rehabilitation Project is still needed.

In June, 2017, FHWA, ODOT and OHPO renewed the Memorandum Of Agreement (MOA) regarding the Brent Spence Bridge Replacement/Rehabilitation Project, Ham-71/75-0.00/0.22 (PID 75119), for Adverse Effect to the B&O Freight And Storage

Building/Longworth Hall, listed on the National Register of Historic Places, Agreement Number 16829 originally executed on June 28, 2012.

Finding of the Reevaluation


FHWA determined as part of the February 11, 2015 Reevaluation, that based on the possibility of tolling the facility, ODOT and KYTC should prepare a Supplemental Environmental Assessment (SEA) to the original Environmental Assessment when they are ready to make final project funding decisions. FHWA continues to maintain this recommendation, should the final project decision include tolling. It is FHWA's understanding that ODOT continues to be the lead State for environmental documentation preparation by agreement between the two States.

If a SEA is required, it will be of limited scope, evaluating the additional impacts associated with tolling the facility, additional alternatives and updated or additional environmental resource impacts including environmental justice considerations. The SEA will also need to consider any new or additional laws, regulations, policies or programmatic approaches between agencies at the time of completion.

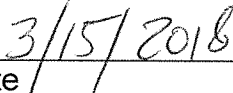
If tolling is not a consideration within the final decision, then ODOT, KYTC and FHWA will coordinated on the scope of a reevaluation (if necessary) to ensure the project's environmental studies are up to date and all issues have been addressed as required.

The environmental resource studies are now more than five years old and require additional review to ensure the NEPA decision remains valid based on the possibility of new, changed or additional regulatory requirements. Once ODOT begins environmental review, they should determine which studies need to be updated to support the environmental decision and include that work as part of any reevaluation.

Until ODOT and KYTC have committed to the potential changes in project scope and the required reevaluation is completed; the existing FONSI dated August 9, 2012 remains valid.



Jeffrey Blanton, P.E.
Director of Program Development



Date