Public Comments and Responses

ID	Name	No.	Comment	Response	Reference ¹
B-1	Talley, Keiuna	B-1-1	01/09/2024 - I am interested in getting information on how to partner and obtain work for my flatbed and semi trucks.	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Economy and Employment (4.1.6)
B-2	Schemmel, Luz Elena	B-2-1	01/10/2024 - I would like to receive updates.	This individual was added to the project mailing list and will receive future project updates.	Ongoing Public & Stakeholder Involvement (5.6)
B-3	Williams, Lori Hunter	B-3-1	01/11/2024 - I would like to be a part of the planning committee for the newly envisioned Brent Spence Bridge Corridor.	KYTC and ODOT have established a Project Advisory Committee to provide feedback on the project development. Members of the public may provide feedback through local representatives who are members of the Project Advisory Committee. Additional information about the Project Advisory Committee and a membership list are provided in the <u>Public Involvement Summary</u> (January 2024).	Local Agency Coordination (5.2) Ongoing Public & Stakeholder Involvement (5.6)
B-4	Coghill, Eric	B-4-1	01/12/2024 - Provisions for future passenger rail service should be made on the new structure. This is a unique opportunity to provide a future corridor for rail access between Cincinnati and Northern Kentucky that would otherwise be prohibitively expensive as a standalone project due to the river crossing.	In 2004, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation</u> <u>Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and	Purpose and Need (2.)



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				need and is not considered to be a reasonable alternative for the Brent Spence Bridge Corridor Project.	
				The project has not incorporated light rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New light rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	
B-5	Greene, Robert D.	B-5-1	01/16/2024 - Local resident with engineering, supervision, management and inspection experience heavy civil construction. Looking for possible employment on challenging project.	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Economy and Employment (4.1.6)
B-6	Walton, James P.	B-6-1	01/16/2024 - I am a former VP of OPW Global and got my Honors B.A. Sc., in Mechanical Engineering from University of Waterloo, Ontario, Canada. I am retired now but wondered if you have advisory committees for design/comment. I was resident in Cincinnati Manager for Highway & Drainage division of Westeel, Toronto many years ago and that division manufactured guiderail, culverts, multi[ports, bridge decking as well as building decking and cladding and corrugated grain bins.	KYTC and ODOT have established a Project Advisory Committee to provide feedback on the project development. Members of the public may provide feedback through local representatives who are members of the Project Advisory Committee. Additional information about the Project Advisory Committee and a membership list are provided in the <u>Public Involvement Summary</u> (January 2024).	Ongoing Public & Stakeholder Involvement (5.6)
B-7	Johnson, Narketta	B-7-1	01/18/2024 - Our company is interested in becoming a vendor for the Brent Spence Bridge Corridor Project.	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at	Economy and Employment (4.1.6)



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				https://walshkokosing.com/. The "Work With Us" page on the project website also contains links to resources for businesses and individuals who want to work on the project.	
B-8	Davis, Char	B-8-1	01/19/2024 - I have a Human Resources Consulting business and would like to know if there is a need for Human Resources, Training & Development, Team Building, Strategic Planning, Consulting, or any other professional administrative skills to help with the Brent Spence Bridge project? We also provide financial services, background checks, and workforce development. Please, contact me at [REDACTED] about my question and interest in the Brent Spence Bridge project. I look forward to hearing from you.	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Economy and Employment (4.1.6)
B-9	DeHart, Tim	B-9-1	01/25/2024 - We would like to known for non hazardous pumping services.	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Economy and Employment (4.1.6)



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B-10	Anthony, James Sr.	B-10-1	01/26/2024 - My Naics code is [REDACTED] (painting) I have DBE Certification. In business since 1984. I would like to help with 1A DBE spend if possible. Please provide instructions.	The progressive design-build portion of the project will include separate goals for disadvantaged business enterprise participation in both the design and construction portions of the contract. Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrentSpence@</u> <u>walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Economy and Employment (4.1.6)
B-11	Smith, Angela	B-11-1	01/26/2024 - The Bridge has always been so dark and close net with the lanes. Will there be lights and hopefully a little bigger lanes.	Refined Alternative I (Concept I-W) will rehabilitate and reconfigure the existing double-decker Brent Spence Bridge to reduce the number of lanes on each deck from four to three and provide inside and outside shoulders. The lane widths and lighting on the structure will be finalized during detailed design and in accordance with current design standards and processes.	Project Description (1.1) Design Criteria (3.4)
B-12	Anonymous	B-12-1	01/26/2024 - Project team has not made a good faith effort to reduce size and give land back to Cincinnati.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements reduce the project footprint and free up land in the project area. Refined Alternative I (Concept I-W) incorporates several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land formerly occupied by the dunnhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge.	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Public Comment Outcomes (5.1.2)



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				In accordance with current policies, ODOT will transfer approximately 10 acres of excess land opened up by refinements to the 3 rd Street, 4 th Street, 5 th Street, and 6 th Street ramps to the City of Cincinnati for potential redevelopment and/or public use. In addition, ODOT has committed to building a wider bridge on Ezzard Charles Drive over I-75 to provide an additional 50 feet of green space on each side that could support potential future civic space or retail development by the City of Cincinnati.	
				Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. One of the design-build contract objectives that will be considered during the evaluation of innovation concepts includes minimizing the footprint of the interstate system to maximize potential developable space.	
B-13	Travieso, Jose Davila	B-13-1	01/27/2024 - not comment on forwardingthe idea gathered observation nationallytourist as New York and California with the phenomenal(Attracted economical spark)	The comment was considered unclear, and no response, other than to document the comment as received, can be provided.	N/A
B-14	Roark- Chesser, Sharon	B-14-1	01/27/2024 - Thank you for the information we received on this very expansive project. I live in Covington, KY. My question: who will be paying the bill?	The total project cost estimate is \$3.6 billion, which includes all costs required to deliver the project, including but not limited to planning, design, property acquisition, construction, construction management services, and agency labor. The cost of the companion bridge and the rehabilitation of the existing Brent Spence Bridge will be split 50/50 between Kentucky and Ohio, and each state will pay for the approach work on their respective ends of the bridge. In December 2022, KYTC and ODOT received \$1.635 billion in federal funding grants under programs	Funding (1.2.1) Cost Estimates (3.6)



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				created by the Bipartisan Infrastructure Law. The Kentucky General Assembly passed, and Governor Beshear signed, a budget bill that included funding to fulfill state match requirements for large projects. Ohio's legislature approved the State Transportation Budget that allows ODOT to use a combination of other federal funding and state funding from the motor fuel tax and bonding.	
B-15	Anonymous	B-15-1	01/29/2024 - Turning W 9 th in Covington into an on-ramp for the C-D ramps to downtown and connection to 5 th street next to the highway will have an impact on residents on W 9 th between Mainstrasse and the highway. Traffic will increase and there are no speed bumps or pedestrian walkways painted on the ground at most crossings although they are legal crossings.	Refined Alternative I (Concept I-W) is anticipated to result in minor impacts to vehicular access and travel patterns due to rerouting. The project is expected to improve pedestrian access and mobility due to the incorporation of new and improved sidewalks and shared-use paths on local roads parallel to and across I-71/I-75. Certified traffic projections prepared for the project show that, by the year 2049, 1,050 vehicles will travel on West 9 th Street each day if the project is not built (the no-build condition). Refined Alternative I (Concept I-W) is expected to increase traffic on West 9 th Street. By 2049, 2,050 vehicles are projected to travel on the portion of West 9 th Street immediately west of the interstate, and 5,550 vehicles are projected to travel on the portion immediately east of the interstate. KYTC and ODOT prepared an <i>Interchange Modification Study Addendum</i> (December 2023) that compared how Refined Alternative I (Concept I-W) would operate when compared to the no-build condition. The analyses concluded that Refined Alternative I (Concept I-W) would result in more congested traffic operations at the intersection of Philadelphia Street and West 9 th Street in the morning rush hour (AM peak travel period). However, the intersection is projected to operate at acceptable levels at all other times of the day. The other West 9 th Street intersections in the study area are projected to operate at acceptable levels through the year 2049. Refined Alternative I (Concept I-W) includes a shared-use path along Simon Kenton Way, sidewalks along West	Traffic (3.8) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				9 th Street between Philadelphia Street and Bullock Street, and a sidewalk along Bullock Street. Marked crosswalks will be provided at all West 9 th Street intersections in the project area. Speed bumps are not proposed to be installed as part of the project.	
		B-15-2	01/29/2024 - Why would you not build sound barriers going through downtown Covington. This is a residential area where you are encroaching on people living there. Despite all the talk of minimizing impact you don't want to include sound barriers for the residents?	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the Covington portions of the project corridor in a <u>Traffic</u> <u>Noise Impact Analysis: Brent Spence Bridge Corridor</u> <u>Project Kentucky – Northern Section</u> (August 2023) and a <u>Noise Analysis Technical Memorandum Kentucky –</u> <u>Northern Section</u> (November 2022).	Noise - Kentucky (4.8.1)
				As a result of those studies, KYTC is proposing noise barriers in Covington on the west side of I-71/I-75 from West 3 rd Street to south of Hermes Avenue and on the east side of the highway from south of Edgecliff Road to Pike Street. KYTC is also going above and beyond its noise policy and proposing a noise/visual screening barrier on the east side of the highway from Pike Street to West 4 th Street.	
				During detailed design, and in accordance with the KYTC <i>Noise Analysis and Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise and noise/visual screening barriers (benefitted receptors) at each location where they are proposed in Kentucky.	
B-16	Anonymous	B-16-1	01/30/2024 - Sound barriers are absolutely necessary through Covington!	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the Covington portions of the project corridor in a <u>Traffic</u> <u>Noise Impact Analysis: Brent Spence Bridge Corridor</u> <u>Project Kentucky – Northern Section</u> (August 2023) and a <u>Noise Analysis Technical Memorandum Kentucky –</u> <u>Northern Section</u> (November 2022).	Noise - Kentucky (4.8.1)
				As a result of those studies, KYTC is proposing noise barriers in Covington on the west side of I-71/I-75 from West 3 rd Street to south of Hermes Avenue and on the east side of the highway from south of Edgecliff Road to	



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				 Pike Street. KYTC is also going above and beyond its noise policy and proposing a noise/visual screening barrier on the east side of the highway from Pike Street to West 4th Street. During detailed design, and in accordance with the KYTC <i>Noise Analysis and Abatement Policy,</i> a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise and noise/visual screening barriers (benefitted receptors) at each location where they are proposed in Kentucky. 	
B-17	Anonymous	B-17-1	01/30/2024 - There needs to be sound barriers with the increased traffic flow and higher elevation. There are instances where I can hear traffic barreling down the hill as far east as Main street Covington that is easily comparable to the Tornado sirens. This is sometimes confusing and leads to false-positives. I would recommend using sound evaluation equipment up during the monthly Tornado siren to compare.	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the Covington portions of the project corridor in a <u>Traffic</u> <u>Noise Impact Analysis: Brent Spence Bridge Corridor</u> <u>Project Kentucky – Northern Section</u> (August 2023). As part of the analysis, noise measurements were conducted at noise-sensitive land uses in the study area and within 500 feet of the proposed roadways. These measurements were conducted to provide field–measured levels along existing roadways and to validate models used to predict traffic noise for Refined Alternative I (Concept I-W). KYTC also evaluated additional noise/visual screening barriers in a <u>Noise Analysis Technical Memorandum Kentucky –</u> <u>Northern Section</u> (November 2022). As a result of those studies, KYTC is proposing noise barriers in Covington on the west side of I-71/I-75 from West 3 rd Street to south of Hermes Avenue and on the east side of the highway from south of Edgecliff Road to Pike Street. KYTC is also going above and beyond its noise policy and proposing a noise/visual screening barrier on the east side of the highway from Pike Street to West 4 th Street. During detailed design, and in accordance with the KYTC Noise Analysis and Abatement Policy, a noise abatement public meeting and surveys will be conducted with the	Noise - Kentucky (4.8.1)



ID	Name	No.	Comment	Response	Reference ¹
				and noise/visual screening barriers (benefitted receptors) at each location where they are proposed in Kentucky.	
B-18	File, Donald R.	B-18-1	01/27/2024 - They should name it " The Bipartisan Bridge" cause finally after 30 something years thats what it took for both sides of the isle and both sides of the Ohio River to come & work together to make it happen!	While the new companion bridge may be formally named, the process for naming the new bridge has not yet been established. KYTC and ODOT have established a Bi-State Management Team to focus on procurement, financing, and project communications, and the Bi-State Management Team will continue working together to deliver the Brent Spence Bridge Corridor Project.	Project History (1.2)
B-19	Muniz, Michael	B-19-1	01/28/2024 - I am interested in working on the project. Is there any information on the contractors that might be hiring. I am a safety professional with years of construction experience that would love an opportunity.	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Economy and Employment (4.1.6)
B-20	Porter- Chandler, Pam	B-20-1	01/29/2024 - TriHealth Queensgate is available to provide walk-in work-related medical care plus we have a mobile medical unit and 24/7 medical care.	Businesses and individuals interested in providing support services to project personnel may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrentSpence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> .	Economy and Employment (4.1.6)
B-21	Flanagan, David	B-21-1	01/30/2024 - Will there be tolls on the new bridge like the two bridges in Louisville? If not why not?	The project does not include tolls. The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio.	Funding (1.2.1)
B-22	Anonymous	B-22-1	01/31/2024 - The primary cause of traffic on the i75 And i71 is the slow moving semi trucks during rush hour. Has any thought been given to adding a congestion fee to semi trucks	The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State	Funding (1.2.1)





ID	Name	No.	Comment	Response	Reference ¹
			driving during rush hours to help keep trucks off the road during rush hour	of Ohio. The Brent Spence Bridge Corridor Project does not include congestion pricing because it is a form of tolling and is therefore prohibited in Kentucky.	
B-23	Jerry	B-23-1	01/31/2024 - Traveling at the end of February and usually go through Cincinnati. How is traffic on Brent Spence Bridge?	The project will not impact traffic on the existing Brent Spence Bridge (BSB) in February 2024. Construction on Phase III of the project (which includes the existing BSB) is expected to begin in 2025, although some limited construction activities may begin in late 2024.	Project Description (1.1)
B-24	Liam	B-24-1	02/02/2024 - One of my greatest concerns with this project is the health risks. The assessment mentions that dust, fumes, and chemicals resulting from the project are harmful to human health and could exceed safe levels. Workers may be given the necessary training and PPE to keep them safe, but what is being done for the thousands of nearby residents who will be exposed to these health risks for years? Attempted mitigation of the health risks as stated in the assessment is not an adequate answer if it means that health risks will be inevitable. Will proper outreach be conducted in order to educate locals on the health dangers that this project might expose them to before it begins?	Air quality studies concluded that Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area. Furthermore, environmental commitments have been incorporated into the project to protect water quality, drinking water, and groundwater, including establishing communication protocols in the event that a spill occurs during construction activities. Some land that will be acquired for the project has been subject to historic contamination, and KYTC and ODOT will remove and properly dispose of regulated solid waste, petroleum- contaminated soil and water, and underground storage tanks that are present on these properties. These activities represent a beneficial effect of Refined Alternative I (Concept I-W) by addressing historic contamination in the project area.	Drinking Water (4.2.7) Regulated Materials (4.4) Air Quality (4.6) Construction Impacts (4.11) Ongoing Public & Stakeholder Involvement (5.6)
			Is there a plan in place to notify and potentially evacuate people nearby if environmental damage reaches dangerous levels? Will there be a fund established for people who potentially develop illnesses resulting from the project? Both Kentucky and Ohio have had recent catastrophic transportation related accidents that have put strain on the health and lives of local communities and the environment which does not inspire my confidence going into this 8+ year long project. And reading through the assessment did not provide me assurance that the lives of local residents are	Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including	

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			being taken seriously enough. The assessment also mentions that the project will implement an outdoor ambient air quality monitoring program during construction in sensitive areas. It follows up by saying that construction activities would be suspended if there are deficiencies exceeding NAAQS levels and will not resume until the problem is identified and corrected. Will the air quality monitoring program data be available for local residents, the general public, or a third party to review and ensure that the workers and contractors are being honest?	areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals. Additional details related to the ambient air quality monitoring program will be determined during detailed design, including locations, times, and durations of air quality monitoring; protocols to address any exceedances of the National Ambient Air Quality Standards (NAAQS) should they be observed; and how monitoring and enforcement data will be made available to the public. KYTC, ODOT and the contractors will also develop an incident management plan for the construction period. Local cities and relevant agencies and first responders, including police, fire, and emergency services, will have an opportunity to review and comment on plans to manage traffic and incidents during construction.	
				Information about ongoing project activities will be shared with the public through project website updates, social media, e-newsletters, local media, presentations to local groups, and virtual project updates. In addition, KYTC and ODOT will establish multiple methods for the public to make inquiries about the project during detailed design and construction (including via the project website, email, direct mailings, and phone) and will provide timely responses to inquiries that are received.	
				The project does not include a fund related to public health. In the event of an unanticipated major incident, KYTC and ODOT will follow existing policies and procedures in each state. Both Ohio and Kentucky have emergency management agencies that are tasked with dealing with major incidents, and ODOT and KYTC actively engage with these agencies when there is a major transportation-related incident.	
B-25	Anonymous	B-25-1	02/03/2024 - Please implement the Bridge Forward plan! This plan will have a tremendously positive impact on Cincinnati,	As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the Brent Spence Bridge (BSB) Corridor	Future Design Refinements (3.7)



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			and we need to make up for the mistakes of the past.	Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <u>Public Involvement</u> <u>Summary</u> (January 2024). During Phase III of the BSB Corridor Project, KYTC and ODOT will evaluate innovation concepts and will consider incorporating measures that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level. During this process, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	Public Comments (5.1.1)
B-26	Leinweber	B-26-1	02/05/2024 - I drive Tuesdays - Saturdays from my home in Downtown Cincinnati, over the BSB and up the cut-in-the-hill to work at DHL @CVG. The highway street lighting on the Kentucky side have not operated properly for over 5 years. KY replaced the older style lamps with LED lamps. HOWEVER, there are STILL 100's of streetlamps that do not work from the BSB all the way to the I71/I275 interchange. This makes traveling this stretch of highway VERY dangerous, especially at nighttime, especially during rain or inclement weather. This stretch of highway is VERY heavily traveled at all hours, especially during rush hours. Furthermore, tractor trailer trucks regularly ignore the "NO TRUCKS THIS LANE" signs painted on the roadway. Maybe they can't see the signs due to the poor street lighting!! ANY plan for the Brent Spence Bridge Corridor must demand that the Commonwealth of Kentucky: 1) Make operational ALL street lighting from the bridge all the way to the I71/I275 interchange.	The purpose and need of the project is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Refined Alternative I (Concept I-W) will rehabilitate and reconfiguring the existing double-decker Brent Spence Bridge to reduce the number of lanes on each deck from four to three and provide inside and outside shoulders. The project will install new lighting on I-71/I-75 throughout the project area. Lighting plans will be finalized during detailed design and in accordance with current design standards and processes.	Project Description (1.1) Purpose and Need (2.) Design Criteria (3.4)

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		B-26-2	02/05/2024 - 2) Erect overhead signage informing tractor trailer drivers that they must use the right 2 lanes, with sufficient notice so the drivers can move over PRIOR to climbing the hill.	The project will install new signing on I-71/I-75 throughout the project area. The design and locations of highway signs will be finalized during detailed design and in accordance with current design standards and guidelines.	Design Criteria (3.4)
B-27	Howard, Tony L.	B-27-1	02/04/2024 - Will the City of Cincinnai issue bonds for its share of the companion bridge? If so, when?	The City of Cincinnati will not be funding any portion of the new companion bridge. The cost of the companion bridge and the rehabilitation of the existing Brent Spence Bridge will be split 50/50 between Kentucky and Ohio, and each state will pay for the approach work on their respective ends of the bridge.	Funding (1.2.1)
B-28	DeShano, Alexander	B-28-1	 02/05/2024 - My name is Alex DeShano, and I am the Transportation manager at Huff Contractors Inc., a specialized transportation company based in West Harrison, Indiana, with a strong focus on heavy and overweight freight, particularly in open deck freight solutions. We have been following the developments of the Brent Spence Bridge Corridor project with great interest and are impressed by the scope and significance of this initiative for the Kentucky and Ohio regions. With our extensive experience in managing and executing logistics for large-scale infrastructure projects, we believe Huff Contractors Inc. can offer unparalleled support in hauling the necessary freight for the construction and related activities of this landmark project. Our fleet is equipped to handle the diverse needs of the Brent Spence Bridge Corridor project, ensuring timely and safe delivery of materials with efficiency and precision. We are committed to contributing to the project's success by leveraging our expertise in heavy and oversized freight transportation, backed by 	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Economy and Employment (4.1.6)



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			our dedication to safety, reliability, and environmental responsibility.		
			We would welcome the opportunity to discuss how Huff Contractors Inc. can partner with your team to meet the project's transportation and logistics needs. Please let us know a convenient time for a meeting or if there are any specific requirements or information you need from us to consider our proposal further.		
			Thank you for considering Huff Contractors Inc. We look forward to the possibility of contributing to this vital infrastructure project.		
B-29	Nighswander, Nicholas	B-29-1	02/05/2024 - Can you please say how much of Goebel Park in Covington is expected to be taken with the new bridge corridor right of way? Thank you.	The construction of Refined Alternative I (Concept I-W) will result in a net 0.6-acre reduction in the size of the Goebel Park Complex. An estimated 2.84 acres of low-lying, flood prone park property will be acquired from the southwest corner of the Goebel Park Complex (2.34 acres in Goebel Park and 0.50 acre in Kenney Shields Park). The acquired land will be mitigated and replaced with an estimated 2.23 acres of currently state-owned property that is at a higher elevation, not prone to flooding, and adjacent to the northwest corner of the Goebel Park Complex.	Goebel Park Complex (4.13.3)
B-30	Riopel, Alexander	B-30-1	02/08/2024 - This project is a huge chance to try to undo at least a small amount of the damage that was done building I-75 and I-71 through Cincinnati in the first place. More land could be given back to Cincinnati by making the ramps to the 6 th Street US 50 Expressway operate as part of an actual street grid instead of as giant highway ramps.5 th Street could have a street bridge with pedestrian and bike space to cross I-71 into Queensgate so that 5 th Street could be reconnected and Cincinnati could have a chance to redevelop the low density industrial space into higher value higher economic	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to reduce the project footprint, improve accommodations for pedestrians and bicyclists, and free up land in the project area. Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Neighborhood and Community



ID	Name	No.	Comment	Response	Reference ¹
			production mixed use medium to high density space. In the current planned design it is extremely unfriendly for anything but private automobiles to cross the chasm that is the I-75 interchange. It is good that ODOT has at least somewhat listened and given some space back to the city to develop, but there is so much more that can be done, even if it is not as ambitious as a highway cap design. There is no reason that a bridge for 5 th Street to reconnect the street grid and more friendly and safe street design instead of just highway ramps to connect to the 6 th Street Expressway cannot be incorporated into this design. Although it may seem unimaginable, it's definitely possible that the 6 th Street Expressway could someday be redeveloped into an at-grade boulevard to try to restore some of the street grid and developable space of Queensgate (which used to be part of the West End with thousands of people!). I believe that ODOT can and should do better, in this current age where cities are trying to make themselves more friendly to humans and not just automobiles.	 I-71/I-75. These improvements will increase the options available to pedestrians and bicyclists, which will enhance community connectivity along and across the I-71/I-75 corridor. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks. In accordance with current policies, ODOT will transfer approximately 10 acres of excess land opened up by refinements to the 3rd Street, 4th Street, 5th Street, and 6th Street ramps to the City of Cincinnati for potential redevelopment and/or public use. In addition, ODOT has committed to building a wider bridge on Ezzard Charles Drive over I-75 to provide an additional 50 feet of green space on each side that could support potential future civic space or retail development by the City of Cincinnati. Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements. Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge Corridor Project. It is anticipated that the design-build team for the Phase III progressive design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and 	Cohesion (4.1.2) Travel Patterns and Access (4.1.4)



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				building the project with a context sensitive design that fits within the community.	
B-31	Stevens, Natalie	B-31-1	02/08/2024 - This is Natalie Stevens and I came across the helpful information you shared on your page at brentspencebridgecorridor.com/ work-with-us/construction-contractor-resources and was wondering if you would be interested in sharing a new resource to that page.	KYTC and ODOT only publish state and federal construction/contractor resources on the project website.	N/A
			From equipment mishaps to structural collapses, construction sites rank among the most perilous workplaces. That's why we started a campaign for construction worker safety, which reviews safety precautions construction workers, managers, and site owners can take to lower the risk of accidents and injuries on the job. Check it out: Construction Safety Campaign - shulman- hill.com/constructionsite-safety/		
			We put a ton of work into it. If you think this guide could be helpful for your readers, would you consider sharing a link to this somewhere on your page? I'm sure you get a lot of requests like this, but I think it may be worth a look. Let me know if you have any questions or thoughts about this.		
B-32	AJ	B-32-1	02/12/2024 - With the City of Cincinnati's new plans to close Elm Street downtown as part of the renovation of the convention center, all commuters coming from I71/I75 North to downtown or OTR who are getting off the 5 th Street exit will not be able to turn north to continue to OTR or FCC's stadium etc. There is a no left turn sign on Central Ave and if Elm is closed all those people won't be able to go north until blocks later at Vine Street. Between	ODOT has closely coordinated the design of local connections to and from the Brent Spence Bridge corridor with City of Cincinnati's Department of Transportation and Engineering. Refined Alternative I (Concept I-W) provides a new exit ramp from the northbound collector-distributor roadway system at Ezzard Charles Drive. This ramp is expected to improve access to Union Terminal, TQL Stadium, and Over-the-Rhine. Elm Street north of 5 th Street in Cincinnati is outside of the traffic study area that was established in the <u>Interchange Modification</u>	Project Description (1.1) Traffic (3.8) Travel Patterns and Access (4.1.4)



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			this and the addition of FCC's stadium I feel like a lot of local connections have changed since the original plans came out and they need to be addressed and incorporated.	<u>Study Addendum</u> (December 2023) that was prepared for the project. Modifications to local roadways outside of the project area are the responsibility of the City of Cincinnati.	
B-33	Pierce, Stephanie	B-33-1	 02/12/2024 - My name is Stephanie Pierce and I'm reaching out on behalf of Spotted Yeti Media, a certified women-owned video strategy and content creation studio. I'm writing in hopes that this is the correct route to being added to your vendor database and having the opportunity to bid on any current or future opportunities related to marketing/ video content creation. I'm happy to complete any necessary steps/paperwork in order to be able to bid on these future opportunities. Would you be able to point me in the right direction for next in being added to your vendor database? 	The progressive design-build portion of the project will include separate goals for disadvantaged business enterprise participation in both the design and construction portions of the contract. Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Economy and Employment (4.1.6)
B-34	Wade, Lakisha	B-34-1	02/13/2024 - Hello, my name is Lakisha Wade. I have completed cornerstone construction program at Citi Link Center, Cincinnati, OH and I would love to come and work with you guys.	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Economy and Employment (4.1.6)
B-35	Anonymous	B-35-1	02/15/2024 - The current plan dramatically increases the concrete footprint of the project which impacts residents in the nearby areas, forests and wetlands.	Refined Alternative I (Concept I-W) incorporates several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land formerly occupied by the dunnhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce	Additional Refinements (3.3) Land Use (4.1.1)



ID	Name	No.	Comment	Response	Reference ¹
				the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge.	Relocations (4.1.5)
				Refined Alternative I (Concept I-W) will convert 51.18 acres of land to transportation use, which will include four residential relocations. The acquisition of property for right-of-way has been, and will continue to be, in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act).	Wetlands (4.2.1) Terrestrial Habitat (4.2.3)
				Refined Alternative I (Concept I-W) will result in permanent impacts to 2.38 acres of emergent wetlands that are dominated by cattails. Based on the analyses completed for the project, it was determined that there is no practicable alternative to the proposed construction in wetlands and that Refined Alternative I (Concept I-W) includes all practicable measures to minimize harm to wetlands that may result from such use. Environmental commitments have been incorporated into the project to minimize and mitigate wetland impacts.	
				Refined Alternative I (Concept I-W) will remove about 90 acres of forested areas. Environmental commitments have been incorporated into the project to minimize and mitigate impacts to forested areas. These include minimizing tree removal and mitigating habitat loss in Kentucky through a contribution to the Imperiled Bat Conservation Fund (IBCF). The IBCF will offset project- related impacts by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts.	
		B-35-2	02/15/2024 - Air quality will decrease and human health impacts will increase if the expected traffic volumes materialize.	Air quality studies prepared for Refined Alternative I (Concept I-W) utilized 2020 existing, 2050 no-build, and 2050 build traffic forecasts that were developed using the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) travel demand model of record. The OKI travel demand model of record was also used to develop the certified traffic projections that were used for the traffic operational analyses for the project. The air quality	Air Quality (4.6) Construction Impacts (4.11)



ID	Name	No.	Comment	Response	Reference ¹
				studies concluded that Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-35-3	02/15/2024 - The current plan does not fully address the problem of toxic stormwater runoff.	In northern Kentucky, transportation projects must address the quantity of stormwater runoff by separating interstate runoff from combined sewer systems. While only runoff from new impervious area is required to be separated, KYTC has committed to separating all interstate runoff from the Brent Spence Bridge (BSB) corridor from the existing combined sewer system.	Utilities (4.12.1)
				In the Cincinnati area, transportation projects must address both the quantity and quality of stormwater runoff, both by separating stormwater runoff from combined sewer systems and providing measures to reduce stormwater pollutants. ODOT has committed to separating highway drainage from the existing combined sewer system in Ohio and partnering with the Metropolitan Sewer District of Greater Cincinnati to build infrastructure to drain directly to Mill Creek and/or the Ohio River.	
				To address water quality treatment requirements in Ohio, vegetated options for stormwater best management practices (BMP's) will be utilized to the maximum extent	



ID	Name	No.	Comment	Response	Reference ¹
				practicable. Given the dense urban land use in the project area, the majority of the stormwater BMP treatment requirements will be addressed via off-site mitigation. ODOT will continue to coordinate off-site mitigation measures with the Ohio Environmental Protection Agency as each project phase progresses through detailed design.	
		B-35-4	02/15/2024 - The current plan does not address the transportation needs of low- income, elderly and other residents.	An <u>Environmental Justice Analysis Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on environmental justice (EJ) populations:	Environmental Justice (4.1.7) Socioeconomic Groups (4.1.8)
				 No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; 	
				- No adverse indirect and cumulative effects;	
				 No disproportionately high and adverse relocation, noise, or temporary construction effects; and 	
				- Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood.	
				A <u>Socioeconomic Technical Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on older adults, individuals with limited English proficiency, adults with disabilities, and zero-car households. The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on these socioeconomic populations and groups:	



ID	Name	No.	Comment	Response	Reference ¹
				 No impacts to community resources; pedestrian, bicycle, and transit access and mobility; safety; air quality; stormwater; and workforce development; 	
				- No indirect impacts;	
				- No substantial noise impacts;	
				 Minimal relocation and greenhouses gases and climate change impacts; 	
				 Minor vehicular access and mobility; visual setting; cumulative; and temporary construction impacts; and 	
				- Benefits due to mitigation and enhancements for parks and historic properties; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics and visual character; and direct and indirect workforce enhancements.	
		B-35-5	02/15/2024 - The current plan ignores feedback from community groups.	KYTC and ODOT have incorporated several refinements into Refined Alternative I (Concept I-W) in direct response to comments and feedback that were gathered from the general public and community groups, including:	Public and Stakeholder Involvement (5.1)
				- KYTC will implement measures to improve safety for pedestrians and school-age children who cross the northbound entrance ramp from Dixie Highway to I-71/I-75. Measures will include reducing length of the crosswalk, installing warning signs, and enhancing the pavement markings to better define the crosswalk for pedestrians and vehicles.	
				 KYTC is proposing a noise/visual screening barrier in the vicinity of Maple Avenue, south and west of Dixie Highway in Fort Mitchell. 	
				 KYTC is proposing a noise/visual screening barrier in the Mainstrasse neighborhood, including in the vicinity of the Goebel Park Complex. 	



ID	Name	No.	Comment	Response	Reference ¹
				 During final design, KYTC will coordinate with the City of Covington to evaluate the use of transparent noise barriers in some locations to preserve views of the Goebel Park Complex from the highway and to preserve views of the skyline and across I-71/I-75 from surrounding neighborhoods. 	
				In accordance with current policies, ODOT will transfer approximately 10 acres of excess land opened up by refinements to the 3 rd Street, 4 th Street, 5 th Street, and 6 th Street ramps to the City of Cincinnati for potential redevelopment and/or public use.	
				- ODOT has committed to work with the City of Cincinnati to conduct before/after surveys of other roadways impacted by increased traffic during construction. ODOT will restore those roadways to pre- construction conditions once the project is complete.	
				- ODOT has committed to building a wider bridge on Ezzard Charles Drive over I-75 to provide an additional 50 feet of green space on each side that could support potential future civic space or retail development by the City of Cincinnati.	
				- In addition, during targeted neighborhood outreach activities, community members generally expressed support for the refinements, mitigation, and enhancements incorporated into Refined Alternative I (Concept I-W), including the reduction of the project footprint, additional developable land, additional noise and noise/visual screening barriers, measures to reduce flooding and combined sewer overflows, new and improved multimodal facilities, and aesthetic features.	



ID	Name	No.	Comment	Response	Reference ¹
		B-35-6	02/15/2024 - These are only a few of the concerns about the human health, ecological and environmental justice impacts of this major road-building project. We need to make sure that any plans do not contribute to environmental concerns. These need to be addressed.	In accordance with the National Environmental Policy Act (NEPA), an Environmental Assessment (EA) was originally prepared for the BSB Corridor Project, and a Finding of No Significant Impact (FONSI) was approved by FHWA on August 9, 2012. Reevaluations completed in 2015 and 2018 concluded that the 2012 FONSI remained valid. A supplemental EA has been prepared consistent with Title 23 of the Code of Federal Regulations §§ 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional NEPA reevaluation and coordination efforts that have occurred since the 2012 EA/FONSI. The supplemental EA provides an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA, including ecological surveys, have been reexamined and updated to meet current state and federal requirements. KYTC and ODOT also conducted additional EJ studies, which are documented in an <i>Environmental Justice Analysis Report</i> .	Introduction (1.) Ecological Resources (4.2) Environmental Justice (4.1.7)
B-36	Doyle, Russ	B-36-1	02/15/2024 - ODOT DO YOUR DESIGN, THE cabal Developers are retro fitting using incremental land left to squeeze out profit and the rag tag council is bought and sold, don't sacrifice our highways n byways. The don't like cars. With civil war group, Model T's.	The comment was considered unclear, and no response, other than to document the comment as received, can be provided.	N/A
B-37	Rippin, Kelly	B-37-1	02/19/2024 - Is there any chance you can provide a little additional insight on a couple things! The website answered a lot of my questions, so thank you for that. Looking for more on these two points to see 1) if the	KYTC and ODOT executed a contract with the progressive design-build team for Phase III of the Brent Spence Bridge (BSB) Corridor Project in October 2024.	N/A



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			progressive design-build team IS under contract &		
		B-37-2	02/19/2024 - 2) if the finalization of supplemental environmental assessment has been complete?	The supplemental Environmental Assessment (EA) was made available for public review on January 26, 2024, and a public comment period concluded on March 8, 2024. KYTC, ODOT, and FHWA will consider all comments received before making a final decision on the supplemental EA. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	Public Hearing (5.5)
		B-37-3	02/19/2024 - Once the progressive design-build team is under contract, begin 60-day Innovation Period to look for opportunities to refine and improve the project further.	Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Based on the current schedule, KYTC and ODOT anticipate sharing refinements to the base design in May 2024.	Future Design Refinements (3.7)
		B-37-4	02/19/2024 - Finalization of a supplemental Environmental Assessment in February 2024.	Based on the current schedule, KYTC and ODOT anticipate receiving final approval of the supplemental EA in April 2024.	N/A
		B-37-5	02/19/2024 - Last question I haveWill there be any NOTICEABLE construction starting in 2024? I know the timeline is tough, but wondering it will be more getting technical things in place or if it's land preps? Appreciate any insight you can offer!	While limited work may begin on Phase III of the BSB Corridor Project in late 2024, construction is not expected to begin in earnest until 2025.	Project Description (1.1)



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B-37A	Stietzel, Walter	B-37A-1	02/20/2024 - I'm a Facility Manager for H5 Data Centers. We own a property that will be affected by the I75 bridge construction and I'm looking for information on what is needed from us. Its apparent that this project will affect our utility power, internet connectivity, local and long-haul communication networks, potable water, and fire system water supply. Could either of you guide me to a resource that can assist me with understanding our responsibilities with respect to this project?	ODOT has already acquired most of the property needed to build the project, and all impacted property owners have been contacted. ODOT will coordinate utility relocation requirements with this property owner during the detailed design phase of the project. Questions about right-of-way acquisition can be directed to the ODOT Brent Spence Bridge Corridor Project Manager: <u>Tom.Arnold@dot.ohio.gov</u> .	Land Use (4.1.1)
B-38	Spillers, Stephan	B-38-1	02/20/2024 - I have heard that the project will include changes as far south as the Ft. Mitchell/Dixie Hwy exit. Will any homes in Ft. Mitchell be required to be vacated as part of this project? My property borders the fence line along 71/75 on East Orchard Rd. in Ft. Mitchell.	Refined Alternative I (Concept I-W) will not require the relocation of any homes in the vicinity of East Orchard Road. One residence that is located immediately adjacent to the northbound I-71/I-75 exit ramp to Kyles Lane has been relocated. KYTC has already initiated the right-of-way process for all property owners in Fort Mitchell who will be impacted by Refined Alternative I (Concept I-W).	Relocations (4.1.5)
	B	of the plans? The southbound side of the interstate in this area already has a sound barrier, but the northbound side just has a chain link fence.	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the Fort Mitchell portions of the project corridor in a <u>Traffic Noise</u> <u>Assessment: Brent Spence Bridge Corridor Project</u> <u>Kentucky Southern Section</u> (August 2023). As a result of that study, KYTC is proposing a noise barrier on the northbound side of I-71/I-75 from Dixie Highway to Kyles Lane. The proposed noise barrier will provide sound reduction along East Orchard Road, which was referenced by the commenter.	Noise - Kentucky (4.8.1)	
				During detailed design, and in accordance with the KYTC <i>Noise Analysis and Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise barriers (benefitted receptors) at each location where they are proposed in Kentucky.	



ID	Name	No.	Comment	Response	Reference ¹
B-39	Maley, Brandon	B-39-1	02/20/2024 - My company owns a property on Gest St [REDACTED]. My tenants are fiber transport companies. Who do I need to speak with regarding modifications to power, water and fiber connectivity to this property that will be affected by the construction efforts?	ODOT has already acquired most of the property needed to build the project, and all impacted property owners have been contacted. ODOT will coordinate utility relocation requirements with this property owner during the detailed design phase of the project. Questions about right-of-way acquisition can be directed to the ODOT Brent Spence Bridge Corridor Project Manager: <u>Tom.Arnold@dot.ohio.gov</u> .	Land Use (4.1.1) Utilities (4.12.1)
B-40	Anonymous	B-40-1	02/20/2024 - Is there any way to complete this work without it taking five years? Seems extremely excessive for a project that is long overdue.	Construction on Phase III of the Brent Spence Bridge (BSB) Corridor Project (Dixie Highway in Kentucky to Linn Street in Ohio) is expected to begin in 2025 and be substantially complete by 2030. Construction on Phase II (Linn Street to Findlay Street in Ohio) is expected to begin in 2026 with completion in 2031. Construction of Phase I (Findlay Street to Marshall Avenue in Ohio) is expected to begin in 2029 and be completed in 2032. The construction timeframes are typical for large, complex urban interstate widening projects and for the construction of a new double decker companion bridge spanning the Ohio River. During Phase III of the BSB Corridor Project, KYTC and ODOT will evaluate innovation concepts and will consider incorporating measures that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level.	Project Description (1.1) Future Design Refinements (3.7)
B-41	Schmidt, John	B-41-1	02/20/2024 - I was there at the beginning and have a website that may be valuable to those. What I provide. Excuse me. I'm sorry. I'm old. I'm 73. But I do have a website that I'd like to convey to you, and you can take a look and see how it might be beneficial to give people an oversight from the beginning as we started. That website is national freedom bridge Is my hope that would be a good name on the bridge. Not that I expect it to happen, but the national freedom bridge is the hallmark of the story on the web that you can. Its national freedom	While the new companion bridge may be formally named, the process for naming the new bridge has not yet been established. KYTC and ODOT have established a Bi-State Management Team to focus on procurement, financing, and project communications, and the Bi-State Management Team will continue working together to deliver the Brent Spence Bridge Corridor Project.	Project History (1.2)



ID	Name	No.	Comment	Response	Reference ¹
			bridge.com You can get that URL and see what I'm talking about.		
		B-41-2	02/20/2024 - I'm a dedicated river straddler and we held out for no tolls, and it looks like we won that battle. Thank you very much.	The project does not include tolls. The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio.	Funding (1.2.1)
B-42	Gray, Kathryn	B-42-1	02/20/2024 - Thank you in advance for this new endeavor. The change will be what's needed.	The commenter's support for the project has been included in the project record.	N/A
B-43	Anonymous	B-43-1	02/20/2024 - The most recent trends indicate that the bridge is receiving less and less traffic.	Existing and historic traffic counts for the Brent Spence Bridge (BSB) were compiled using a variety of data generated by ODOT, KYTC, and the Ohio-Kentucky- Indiana Regional Council of Governments (OKI). Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019.	Traffic (3.8)
				KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				Traffic projections prepared during the preparation of the 2012 Environmental Assessment estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume	



ID	Name	No.	Comment	Response	Reference ¹
				of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	
		B-43-2	02/20/2024 - While the bridge's current state is concerning, I believe adding an additional bridge with an alarming amount of lanes on top of the additional land it will consume to construct are concerning. While a multibillion project is required to alleviate such issues, I believe that the focus is in good faith but not solving the root problem. The root problem seemingly being that the current Brent Spence Bridge is defunct in its ability to accommodate both local and interstate traffic.	The purpose and need of the project is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors.	Purpose and Need (2.)
		B-43-3	02/20/2024 - A singular bridge with minimal lanes with rail and walkways included on such a bridge could easily solve the problems that the Brent Spence Bridge is currently not solving and leaving the Brent Spence Bridge as is, with structural improvements and additional on ramp and off ramp improvements. I entirely understand that this would require buy-in from both Kentucky, Ohio and their respective local cities. Without considering this as a viable option, the stakeholders involved would be doing themselves a disservice. The end results hopefully could save tax payer dollars, improve local businesses along roadways/railways and increase the value of property along these pathways as well. By blindly continuing down the path of creating a separate bridge with such negative consequences such as the current proposed project could leave a negative foot print for decades to come. Especially given that this has occurred due to the prior I-75 project decades ago. Merely, I'm asking and hoping for	The alternatives analysis completed during the development of the 2012 Environmental Assessment and Finding of No Significant Impact for the BSB Corridor Project considered single-deck bridges with fewer lanes. However, these alternatives were removed from consideration because they did not meet the project purpose and need. Adequate capacity was not provided to serve the travel demand in the project corridor. One alternative considered two single-deck bridges on both sides of the existing BSB. That alternative was removed from consideration due to fatal flaws due to geometric design constraints associated with providing the necessary connections in Ohio. Traffic operational analyses documented in an <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) meets the project purpose and need by reducing congestion and improving operations throughout the project area. In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study	Project History (1.2) Purpose and Need (2.) Future Design Refinements (3.7) Traffic (3.8) Travel Patterns and Access (4.1.4) Public Comment Outcomes (5.1.2)

ID	Name	No.	Comment	Response	Reference ¹
			a reconsideration of the proposal. Designed more for the current wants and needs of the respective cities and states involved.	known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project.	
				The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	
				Pedestrian and bicycle accommodations will not be permitted on the new companion bridge or the existing BSB because of the proximity of a reasonable crossing at the Clay Wade Bailey Bridge. Preliminary investigations indicate that adding bike lanes to the Clay Wade Bailey Bridge may be feasible. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. KYTC and ODOT have committed to evaluate reconfiguring the lanes on the Clay Wade Bailey Bridge to add bicycle lanes during the innovation process.	
B-44	Gilbert, Elizabeth	B-44-1	02/20/2024 - On a macro level, additional lanes of traffic will increase and not decrease traffic.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i>	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
				<i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> (<i>December 2023</i>), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <i>Interchange Modification Study Addendum</i> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-44-2	02/20/2024 - This is environmentally irresponsible. We need to invest money on the scale of this project into more effective public and active transportation infrastructure including train, streetcar, bus, biking, and walking.	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project.	Purpose and Need (2.) Travel Patterns and Access (4.1.4) Public Hearing (5.5) Ongoing Public & Stakeholder

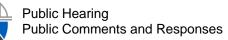


ID	Name	No.	Comment	Response	Reference ¹
				The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level. In consideration of feedback provided by the City of Cincinnati Department of Transportation and Engineering, ODOT will design and construct the non-deck components for the new Ezzard Charles Drive bridge over I-75 to not preclude potential future streetcar route expansion. The design modification will not change the footprint or the environmental impacts of the project. Refined Alternative I (Concept I-W) is expected to improve pedestrian access and mobility due to the incorporation of new and improved sidewalks and shared-use paths on local roads parallel to and across I-71/I-75. Refined Alternative I (Concept I-W) is also expected to provide and	Involvement (5.6)
				overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
B-45	Sanders, Bob	B-45-1	02/20/2024 - I'm a resident of Fort Mitchell Heights subdivision, which is the actual historic site where Fort Mitchell, the Civil War fort that protected Cincinnati, located. My house is precisely on that. What I'm concerned about is that, as I understand the plan, there will be no sound screen or no sound wall protecting the Fort Mitchell Heights subdivision area from the highway noise. I can tell you that as the highway already exists and without the additional traffic that these improvements are	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the Fort Mitchell portions of the project corridor in a <u>Traffic Noise</u> <u>Assessment: Brent Spence Bridge Corridor Project</u> <u>Kentucky Southern Section</u> (August 2023). As a result of that study, KYTC is proposing a noise barrier on southbound I-71/I-75 north of Dixie Highway. The Fort Mitchell Heights subdivision, which was referenced by the commenter, is beyond the area studied in the noise assessment.	Noise - Kentucky (4.8.1)



ID	Name	No.	Comment	Response	Reference ¹
			going to bring, it is nearly impossible for people in the vicinity where I live to utilize their yards, their decks, their pools, or anything else. I would like to, at some point be told how I can communicate with Kentucky DOT people who are in charge of making decisions about noise walls so that we could have the neighborhood, the area that I'm talking about, considered for noise protection.	KYTC also prepared a <u>Technical Memorandum</u> : <u>Additional Traffic Noise Assessment Kentucky Southern</u> <u>Section</u> (February 2023) that evaluated extending the noise analysis area further west to include a noise barrier for residences in the vicinity of Summit Lane in the Fort Mitchell Heights subdivision, which is the area referenced by the commenter. The technical study also evaluated extending noise barriers to provide noise reduction for additional businesses with exterior uses, a hotel, and a day care center west of I-71/I-75 between Kyles Lane and Dixie Highway. Based on the evaluation, KYTC determined that extended noise barriers in these areas were not reasonable nor recommended. During detailed design, and in accordance with the KYTC <i>Noise Analysis and Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise and noise/visual screening barriers (benefitted receptors) at each location where they are proposed in Kentucky.	
B-46	Scarpitto, Bobby	B-46-1	02/20/2024 - I'm with Kwik Bond Polymers. We manufacture a deck overlay material that I would like to be considered as an enhancement measure not only for the Brent Spence Bridge, the one that's in existence today, but the new one, and then all the flyover bridges. We have been in business for over 40 years. We work on all the coasts or both coasts, and we would just like to be considered as an alternative material or as part of the original design feature for the bridges. That's it. Thank you.	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project. You may also visit ODOT's " <u>New Products</u> " website for information on how to get materials approved for use on ODOT projects.	Economy and Employment (4.1.6)
B-47	Clements, Nichole	B-47-1	02/20/2024 - I'm the watershed coordinator for the Banklick Watershed Council. We're a local nonprofit working to clean and restore Banklick Creek, which is Kenton County's largest watershed. While we commend the project	KYTC will coordinate with the Sanitation District No. 1 of Northern Kentucky (SD1) during detailed design on stormwater management and erosion control within the project limits that impact Moser's Branch Creek, a tributary to Banklick Creek.	Utilities (4.12.1)





ID	Name	No.	Comment	Response	Reference ¹
			team on their work in the combined sewer system to address stormwater runoffs within the Willow Run watershed, we do have concerns about the areas of the project that cross through a tributary of Banklick Creek. Specifically, this is the area between Kyle's Lane and Dixie Highway. While this area is served by a municipal separate storm sewer system, those outfalls discharge directly to a tributary called Moser's Branch. The flows from Moser's Branch actually pass underneath 75/71 and then flow along Highland Pike down to Kentucky 17, where it eventually joins the main stem of the Banklick.		
			There is a long history of overburdened hillsides, landslides, and instability along that Highland Pike corridor. In fact, landslides there have already caused millions of dollars' worth of damage to sewers and the Fort Wright Nature Preserve. Our concern is that the highway runoff both from existing and future impervious surfaces that enter Moser's Branch will cause further issues by eroding the toe of the slope at the base of that Highland Pike landslide. So, what we are asking is that it's essential that KYTC improve the existing and future stormwater management of this area to protect against further erosion by designing to SD1 standards for stream channel protection. The watershed council will be providing our additional written comments in the next couple of weeks that has more background study information and data relating to this issue.		
B-48	Gray, Kathy	B-48-1	02/20/2024 - I'm so excited because this is the vein to the city that I live in. I am from California. It's very painful and a trap for me, but I'm excited that you guys have decided to do this. And to see it come to pass is going to	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at	Economy and Employment (4.1.6)



ID	Name	No.	Comment	Response	Reference ¹
			 be something that's a part of my dream. I'm a small business owner, and I am in transportation. I would like to say that my company, Inside Purpose, would have a play in this. The change that you're about to make is something that I've seen in California. This is nothing new to me, but it's definitely an asset. I would like to play a part of it. And I'm wishing you nothing but success because in order for the city to change and grow, we got to first understand what the change is. And I appreciate you. Thank you. 	https://walshkokosing.com/. The "Work With Us" page on the project website also contains links to resources for businesses and individuals who want to work on the project.	
B-49	Hightower, Bernita McCann	B-49-1	02/20/2024 - I'm the president and CEO of Next Generation Fuel. We are a woman certified and minority certified company that is a licensed wholesale distributor of petroleum products, gasoline, diesel alternatives. We also put tanks onsite and we work very well with construction companies. My question today, first off, I commend looking at disadvantaged businesses to participate in a project as such. But companies like ourselves that are woman owned or minority owned, how can we be considered as a part of a project with knowing the different qualifications of a DBE company versus an MBE or a WBE company and not being able to mix the two? So, I know that there's a goal that will be for DBE. However, I would like to know if there is a goal set for the others that are also considered as disadvantaged businesses such as woman home and minority owned.	As a federally funded project, the Brent Spence Bridge Corridor Project has a disadvantaged business participation goal through the federal Disadvantaged Business Enterprise (DBE) program. The project will not have separate established goals for certified Minority Business Enterprise (MBE) or Women Business Enterprise (WBE) business participation. Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Economy and Employment (4.1.6)
B-50	Mitchell, Anne	B-50-1	02/20/2024 - I'm a resident of downtown Covington. I wanted to thank the project team for minimizing the impacts on Lewisburg and on Goebel Park, and I just wanted to express my concern. During the repair period for the	During construction, the area surrounding the I-71/I-75 corridor will be temporarily impacted by increased traffic on local roads, reduced access, and detours due to construction activities. These impacts are anticipated to	Construction Impacts (4.11)



ID	Name	No.	Comment	Response	Reference ¹
ID	Name	No.	Comment Brent Spence we had an enormous amount of trouble with trucks coming down through the residential neighborhoods because they didn't know exactly where to go. I think that rerouting through trucks during the construction period on 275 would be a huge help in avoiding that going forward. Thank you.	 some extent for all modes of transportation, including vehicular, pedestrian, bicycle, and transit. KYTC and ODOT are working with local cities and counties to mitigate impacts from construction activities. On June 15, 2022, KYTC and the City of Covington finalized a Memorandum of Understanding (MOU) regarding the National Environmental Policy Act process. Among other items, the MOU addresses measures to minimize temporary construction impacts. KYTC and ODOT will prepare detailed traffic management and maintenance of traffic (MOT) plans to minimize traffic disruptions to vehicular, bus, pedestrian, and bicycle traffic during construction. The MOT plan will evaluate available travel lanes on the mainline interstate during construction to reduce the potential that the project will induce traffic diversion similar to that experienced during recent closures and restrictions on the existing Brent Spence Bridge. A project incident management plan will be developed to minimize diversion resulting from incidents occurring within the project limits during construction to the extent 	Reference ¹
				within the project limits during construction to the extent practicable. The City of Covington will be provided an opportunity to review and comment on the MOT and incident management plans as they are developed. KYTC will work directly with the City of Covington to ensure that all relevant agencies and first responders, including police, fire, and emergency services, have an opportunity to review and provide input into all aspects of MOT planning, MOT and incident management plan development, and construction period operations affecting their respective cities.	
				While through trucks will not be required to reroute to I-275 during construction, the MOT plan and the project communications plan will include provisions for communicating with trucking companies and mapping services to notify them of detours and delay information related to the project.	



ID	Name	No.	Comment	Response	Reference ¹
B-51	Kirschner, Chris	Chris Transportation and Kentucky Transportation Cabinet for hosting this hearing today. I'm Kirschner, president and CEO of the Dayto Area Chamber of Commerce and the Dayto Area Logistics Association, representing or 2200 businesses in a 14 county Greater Dayton region. The Brent Spence Bridge is \$3.6 billion interstate improvement project will have significant impact on business an economic development for our entire regio This project will not only improve workforce commuting and position the broader regior more attractive for residents but will also position locations like the interchange of I- and I-75 in Dayton as an epicenter for logis	Dayton region. The Brent Spence Bridge is a \$3.6 billion interstate improvement project that will have significant impact on business and economic development for our entire region. This project will not only improve workforce commuting and position the broader region as	The commenter's support for the Brent Spence Bridge (BSB) Corridor Project has been included in the project record. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Refined Alternative I (Concept I-W) will reduce congestion and improve safety on a critical freight route that carries more than \$1 billion of freight every day and more than \$400 billion of freight every year, an estimated 2 percent of U.S. Gross Domestic Product. Refined Alternative I (Concept I-W) will ensure that the corridor can continue to reliably support economic growth and activity in the region and the nation.	Purpose and Need (2.) Economy and Employment (4.1.6) Construction Impacts (4.11)
			 In today's manufacturing world that is reliant on just in time deliveries, efficient infrastructure with minimal delays is critical to economic attractiveness. When trucks are delayed, assembly lines are shut down and workers are sent home. Ensuring the Brent Spence corridor is efficiently running is critical to maximizing global economic attractiveness for all of us. The Dayton region's logistics and distribution companies have a \$3.5 billion annual economic impact and support over 40,000 local jobs. Downtown Dayton is only 56 miles north on I-75 from where we are sitting today. Improving the Brent Spence will not only positively impact Cincinnati and northern Kentucky, but impacts all communities on this corridor. A special recognition to ODOT District 8 that has made DBE and DNI and supplier diversity a priority and have been doing outreach to Dayton area companies. Thank you for having me today and 	Refined Alternative I (Concept I-W) is anticipated to result in net benefits to workforce development and employment in the greater Cincinnati and Northern Kentucky regions. During the progressive design-build contract for Phase III of the BSB Corridor Project, KYTC and ODOT will establish separate goals for disadvantaged business enterprise participation in both the design and construction portions of the contract. KYTC and ODOT will also develop an on-the-job training program and workforce development plan. These initiatives are anticipated to create jobs, support business development, and support income growth in the greater Cincinnati and Northern Kentucky regions. KYTC and ODOT have also formed a BSB Corridor Project Diversity & Inclusion Outreach Committee, which allows local practitioners and leaders to provide input about promoting diversity and inclusion as part of the Phase III contract. In addition, the construction of Refined Alternative I (Concept I-W) is expected to result in temporary increases in employment due to construction job creation.	

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			for your leadership to improve this vital corridor for everyone.	Temporary economic benefits are also anticipated due to increased sale of construction supplies, materials, equipment, and fuel from local and regional sources and increased revenue for businesses providing services to construction crews.	
B-52	Metz, Pete	B-52-1	 02/20/2024 - I'm the vice president of civic and regional partnerships at the Cincinnati Regional Chamber. For more than a decade, the Cincinnati business community has been deeply invested in seeing this project move forward. We've long understood how critical the bridge is to our region and ultimately the entire country. We're thrilled to finally be at this point after years of advocacy in Columbus, Frankfurt and Washington. Over the last few years, we've been incredibly appreciative of how the project team at ODOT and KYTC have engaged the local communities, both the public sector and the broader community to ensure the project is delivered in a way that maximizes the value to the communities it's being built in. I've appreciated the close working relationship they've had with the city of Cincinnati and the city of Covington and the structures the cities and ODOT have created to seek input. From the beginning, we, the chamber, have pushed to reclaim land in the footprint and improve the connectivity across the border, all while ensuring that this project's budget and timeline are not negatively impacted. The Cincinnati Chamber has always believed that the best way to see continued improvements was for the public partners to work together through the progressive design-build process. That intentional engagement has already yielded results. As we saw today, ODOT has already delivered back to the city of Cincinnati nearly 10 acres of land on the western side of downtown. They've already embraced our shared goals by adding additional 	The commenter's support for the Brent Spence Bridge (BSB) Corridor Project has been included in the project record. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2)

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ID	Name	No.	Comment	Response	Reference ¹
			connectivity, and I expect that the innovations and work being done by Walsh-Kokosing will yield more improvements soon.	developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
			This is a generational project for the region, and it's one that a broad and diverse set of leaders have worked so hard to deliver at the chamber. We appreciate the strong work being led by ODOT and KYTC and look forward to supporting them however we can to get this project done.		
B-53	Gray, Kathy	B-53-1	02/20/2024 - Im excited this is in progress – This road is a true vein to my time to and from KY and Ohio. This is a true vision that really make sense. My concern is how well defined are your plans around the timeline. We currently have traffic issues, and the bridge is a change that s going to be amazing for our city. Thank you to the team that has worked so hard, and I stand behind you and excited to see this happen.	Construction on Phase III of the Brent Spence Bridge Corridor Project (Dixie Highway in Kentucky to Linn Street in Ohio) is expected to begin in 2025 and be substantially complete by 2030. Construction on Phase II (Linn Street to Findlay Street in Ohio) is expected to begin in 2026 with completion in 2031. Construction of Phase I (Findlay Street to Marshall Avenue in Ohio) is expected to begin in 2029 and be completed in 2032.	Project Description (1.1)
B-54	Weidl, Gerhard (Garry)	B-54-1	02/20/2024 - Noise barrier needs to be continuous from south of Hermes to Watkins – There is a natural valley between Watkins & Hinde St. (opening is nearer to Hinde St.) This valley forms a funnel from I-75/71 west up the valley / hill to the houses on Hermes between Hinde & Watkins Sts.	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the portions of the corridor that include Watkins Street and Hinde Street in a <u>Traffic Noise Impact Analysis: Brent</u> <u>Spence Bridge Corridor Project Kentucky – Northern</u> <u>Section</u> (August 2023) and a <u>Noise Analysis Technical</u> <u>Memorandum Kentucky – Northern Section</u> (November 2022).	Noise - Kentucky (4.8.1)
				As a result of those studies, KYTC is proposing a noise barrier on the west side of I-71/I-75 from West 3 rd Street to south of Hermes Avenue, which includes the area referenced by the commenter. The noise barrier in this area consists of several stand-alone noise walls. The proposed noise walls are located immediately adjacent to I-71/I-75 in the vicinity of Watkins Street and at the top of the slope west of the interstate in the vicinity of Hermes Avenue. The placement of the stand-alone noise walls	



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				was determined based on a barrier analysis and was determined to provide the greatest noise reduction in this noise sensitive area. The proposed noise barrier was found to be feasible and reasonable when situated in the existing topography.	
				During detailed design, and in accordance with the KYTC Noise Analysis and Abatement Policy, a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise and noise/visual screening barriers (benefitted receptors) at each location where they are proposed in Kentucky. KYTC will further evaluate the space between the stand alone noise walls referenced by the commenter during detailed design and the noise public involvement process.	
		B-54-2	02/20/2024 - The wooded area within this valley (0.7 - 1.5 acres) would/could make a good "pocket park" area for Lewisburg but infilling to bring up to grade might be an option as well to help alleviate the hwhy noise issue	The City of Covington is responsible for developing and maintaining public parks in the Lewisburg area. The project would not preclude the construction of a pocket park in the future if supported by local development patterns, plans, and initiatives.	Noise - Kentucky (4.8.1)
			as well.	The noise studies completed for the project concluded that a noise barrier can be built in the existing topography and meet the requirements of KYTC's noise policy. Therefore, KYTC is proposing a noise barrier in this area (on the west side of I-71/I-75 from West 3 rd Street to south of Hermes Avenue).	
B-55	Keshkoff, Diane	B-55-1	02/20/2024 - My concern is the ability to enter & exit, north or south from Rte 8 without too much difficulty.	Refined Alternative I (Concept I-W) will provide similar access to southbound I-71/I-75 from Route 8 (Highway Avenue) in Covington. The West 4 th Street ramp to the northbound collector-distributor roadway system in Covington, which continues on to I-71 and I-75, will be open to all vehicles, as opposed to the existing emergency vehicle access only. This change will restore access that currently is restricted and will improve access to northbound I-71/I-75 from Route 8 (Highway Avenue).	Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
B-56	Hill, Steven	B-56-1	02/20/2024 - Specific connection between Lewisburg neighborhood to westside neighborhood by creating a pedestrian /bikeway over the interstate. This can occur @ the end of Hermes St in Lewisburg or where Pike St turns into Lewisburg and terminate @ the hospital. This would connect several bikeways, allow unique lighting and signage across the interstate highways.	Refined Alternative I (Concept I-W) includes new and rebuilt sidewalks across I-71/I-75 under the MLK/West 12 th Street, Pike Street, West 9 th Street, West 5 th Street, and West 3 rd Street bridges. A new shared-use path will be built under the West 9 th Street and West 5 th Street bridges, which will tie into the shared-use paths in Goebel Park. The shared-use path will be extended along Crescent Avenue to connect to the existing shared-use path along the river. The proposed pedestrian and bicycle accommodations connect existing residential and recreational areas and tie into existing and planned pedestrian and bicycle infrastructure. Constructing a new pedestrian/bicycle overpass across	Travel Patterns and Access (4.1.4)
				I-71/I-75 in between Hemes Street or Pike Street and St. Elizabeth Covington Hospital would require additional right-of-way acquisition and would present feasibility concerns due to the incorporation of noise walls along the west and east sides of the highway. While the project does not currently include any new pedestrian/bicycle bridges over I-71/I-75, the project would not preclude the construction of such facilities in the future if supported by local development patterns, plans, and initiatives.	
B-57	Smith, Aja Imperial Shason	B-57-1	02/20/2024 - I hope the Brent Spence Bridge work for Ohio Midwest and Kentucky the south.	The commenter's support for the Brent Spence Bridge Corridor Project has been included in the project record.	N/A
B-58	Wenzl, Thurman	B-58-1	02/20/2024 - I walked here to the hearing, from 0.7 miles east. Too much money is being spent in this project to encourage more car traffic – when (IMHO) transportation planners need to consider other options. And fewer people are commuting into downtown cinci with work from home and suburban offices.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange</i> <i>Modification Study Addendum</i> (December 2023), and the	Traffic (3.8) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Traffic projections for Refined Alternative I (Concept I-W) were developed using the OKI regional travel demand model, which assigns routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times.	
				Projected population and employment growth are also incorporated into OKI's regional travel demand model. Traffic operational analyses documented in an <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods.	
				Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an	



ID	Name	No.	Comment	Response	Reference ¹
				invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access. Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus	
		B-58-2	02/20/2024 - Recent evidence suggests that PM 2.5 is not just associated with chronic lung disease – but may also be associated with elevated breast cancer, according to research at Natl's Inst. For Env Health Sci.	stops. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for particulate matter that is 2.5 micrometers or less in diameter (PM2.5). As such, PM2.5 conformity requirements do not apply, and additional PM2.5 analysis is not required for Refined Alternative I (Concept I-W).	Particulate Matter (4.6.3) Emissions Burdens Analysis (4.6.5)
				KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no-build, and 2050 build scenarios. The analyses concluded that emissions of the analyzed pollutants would be substantially reduced for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant. Given the	Construction Impacts (4.11)



ID	Name	No.	Comment	Response	Reference ¹
				above, Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
B-59	Hartke, Joe	B-59-1	02/20/2024 - I live blocks away from the current highway and I can often smell brake dust when walking through Linden Grove.	Brake dust is a component of particulate matter that is 2.5 micrometers or less in diameter (PM2.5). The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5. As such, PM2.5 conformity requirements do not apply, and additional PM2.5 analysis is not required for Refined Alternative I (Concept I-W). KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no-build, and 2050 build scenarios. The analyses concluded that emissions of the analyzed pollutants would be substantially reduced for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. When the 2050 build scenario is compared to the 2050 no-build scenario.	Particulate Matter (4.6.3) Emissions Burdens Analysis (4.6.5) Construction Impacts (4.11)



ID	Name	No.	Comment	Response	Reference ¹
				the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant. Given the above, Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-59-2	02/20/2024 - I sit in my back yard and am lulled to sleep by the scream of tires.	The commenter did not provide a specific address or location for their residence. Therefore, only a response regarding noise in the vicinity of the Linden Grove Cemetery, which was referenced by the commenter, can be provided.	Noise - Kentucky (4.8.1)
				KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the portions of the corridor that include the Linden Grove Cemetery in a <u>Traffic Noise Impact Analysis: Brent</u> <u>Spence Bridge Corridor Project Kentucky – Northern</u> <u>Section</u> (August 2023) and a <u>Noise Analysis Technical</u> <u>Memorandum Kentucky – Northern Section</u> (November 2022).	



ID	Name	No.	Comment	Response	Reference ¹
				As a result of those studies, KYTC is proposing noise barriers on the east side of I-71/I-75 from Kyles Lane to West 12 th Street, which includes the Linden Grove Cemetery area referenced by the commenter. In accordance with KYTC's noise policy, only noise sensitive receptors within 500 feet of the project corridor were analyzed for noise impacts. The noise studies concluded that the proposed noise barrier will result in a 1 to 7-decibel reduction in noise levels in the portions of the Linden Grove Cemetery that are within 500 feet of the project corridor. During detailed design, and in accordance with the KYTC <i>Noise Analysis and Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise and noise/visual screening barriers (benefitted receptors) at each location where they are proposed in Kentucky.	
		B-59-3	02/20/2024 - I want to be able to walk and bike places, that's why I live downtown but I must deal with this freeway so people can live in inefficient style family homes.	Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. These improvements will increase the options available to pedestrians and bicyclists, which will enhance community connectivity along and across the I-71/I-75 corridor and may improve access to transit, employment, healthcare, cultural, recreational, and commercial destinations.	Travel Patterns and Access (4.1.4)
				At Pike Street and West 12 th Street/MLK Jr. Boulevard, the project will improve connections to the Lewisburg neighborhood, which was left isolated from greater Covington by the original interstate construction. In Ohio, the bicycle and pedestrian infrastructure will improve connectivity in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods. New bicycle lanes and shared- use paths incorporated into Refined Alternative I (Concept I-W) will support future planned improvements of regional pedestrian and bicycle networks.	



ID	Name	No.	Comment	Response	Reference ¹
		B-59-4	02/20/2024 - I commuted across the BSB for ten years and never thought once that it needed to be bigger.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors.	Purpose and Need (2.)
		B-59-5	02/20/2024 - Cincinnati is already a mess with cars I don't know why we can't get transit.	In 2004, the Ohio-Indiana-Kentucky Regional Council of Governments and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit routes would not meet the project purpose and need and are not considered to be a reasonable alternative for the Brent Spence Bridge (BSB) Corridor Project. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	Purpose and Need (2.) Travel Patterns and Access (4.1.4)
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	



ID	Name	No.	Comment	Response	Reference ¹
B-60	Hyland, Bob	B-60-1	02/20/2024 - I'm an associate professor, educator of writing, and affiliate faculty environmental studies at the University of Cincinnati. Speaking today on my own behalf. In eleven years since Concept I-W was concocted in 2012, we have experienced the ten hottest years for average global land and ocean surface temperature anomaly. If we're honest with ourselves, what this means is that the automobile infrastructure we have constructed over the last hundred years and the fossil fuel industry, which moves vehicles on it, is driving us into an existential climate crisis.	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change. Refined Alternative I (Concept I-W) will separate highway runoff from combined sever systems and will address	Greenhouse Gases and Climate Change (4.7)
			runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .		



ID	Name	No.	Comment	Response	Reference ¹
		B-60-2	02/20/2024 - And yet, in the supplemental environmental assessment for Concept I-W, which you developed contemporaneous to easily accessible emerging data on global heating and an alternative of passenger rail, something that would start to get our country closer to the rest of the world in terms of joining them in modernity and an alternative that would help remove us from the climate crash course the Brent Spence Bridge Corridor Project helps ensure, is conspicuously missing.	In 2004, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation</u> <u>Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and need and is not considered to be a reasonable alternative for the Brent Spence Bridge (BSB) Corridor Project. The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	Purpose and Need (2.)
		B-60-3	02/20/2024 - Similar to the failure of the SEA to consider a sufficient alternative given our current understanding of the climate crisis, so too does the SEA fail on its approach to environmental justice consideration, literally just four or five people who filled out demographic data at your EJ sessions for this project identified as minority, while some 105 identified as white.	Opportunities for environmental justice (EJ) communities to offer feedback about the project occurred during targeted EJ/neighborhood outreach meetings in late 2022 and open-house project update meetings in August 2023. Between November 15, 2022 and December 20, 2022, KYTC and ODOT hosted 16 targeted neighborhood outreach meetings (12 small-scale meetings) in individual neighborhoods and 4 broad-scale meetings). A total of 418 people signed in at the meetings, excluding the project team. Comments were accepted on a website dedicated to the targeted neighborhood outreach between November 15, 2022 and January 5, 2023. The website was viewed 2,559 times, with 218 individuals choosing to engage by submitting comments or responding to polling questions. While demographic questionnaires were available at all in-person neighborhood meetings, and polling questions on the PublicInput website sought	Environmental Justice (4.1.7)



ID	Name	No.	Comment	Response	Reference ¹
				demographic data of participants, providing demographic data was optional. Of the over 600 individuals who actively participated in the targeted EJ/neighborhood outreach activities, less than 20 percent chose to provide demographic data.	
				No additional small pockets of EJ populations were identified during the targeted neighborhood outreach activities. To the extent the project team was able to ascertain, minority and low-income individuals asked questions and offered comments and feedback consistent with other participants in the neighborhood outreach. The project team did not identify any concerns unique to EJ populations. Likewise, unanticipated additional impacts on EJ populations were not identified during the EJ outreach.	
				EJ communities were also afforded the opportunity to provide feedback during open-house project update meetings that occurred in August 2023 and the associated public comment period. The comments received did not express any concerns unique to EJ communities. Likewise, the project team did not identify any unanticipated additional impacts on EJ populations as a result of the open-house project update meetings.	
		B-60-4	02/20/2024 - Of the many thousands of BIPOC [Black, Indigenous, and people of color] folks living in the lower Mill Creek Valley who have been generational victims of interstate highway projects already, and who will yet again breathe the diesel fumes required to construct this project while simultaneously carrying disproportionate burden of PM 2.5., air toxics cancer risk, air toxics respiratory HI, toxic releases to air and more, you manage to engage just four or five on the demographic questionnaire.	Air quality effects on EJ (minority and low-income) populations were evaluated in an <u>Environmental Justice</u> <u>Analysis Report</u> (January 2024). Air quality evaluations considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone. In addition, a <u>Quantitative MSAT</u> <u>Analysis Report</u> (August 2023) concluded that Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on mobile source air toxics (MSAT) emissions. To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that	Environmental Justice (4.1.7)

ID	Name	No.	Comment	Response	Reference ¹
				modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the EJ study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the EJ study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Twenty (20) percent of the census block groups with minority and/or low-income populations in the EJ study area are in Kenton County; therefore, the slightly greater level of PM2.5 when the 2050 build scenario is compared to the 2050 no-build scenario will not be predominately borne by EJ populations nor is it appreciably more severe or greater in magnitude than the level of PM2.5 emissions for the non-EJ population. Completing demographic questionnaires during targeted EJ/neighborhood outreach activities held in late 2022 was optional. Of the over 600 individuals who actively participated, less than 20 percent chose to provide demographic data.	
		B-60-5	02/20/2024 - And offered the West End neighborhood an interpretive plaque. This is unacceptable. As is, from the SEA, it is difficult to conclude anyway, other than the fact that this project intends to create an environmental sacrifice zone, is complicit in perpetuating the racist environmental injustices of interstate projects here in the late fifty's and sixty's and shamefully lacks moral reflection and creative vision from our local, state and national leaders. We need to do better. Thank you.	Refined Alternative I (Concept I-W) was evaluated for cumulative effects specific to EJ populations. Refined Alternative I (Concept I-W) will result in a minor contribution to cumulative residential and commercial displacements and a cumulative loss of parkland and historic resources in these communities. These minor cumulative effects will be experienced by all populations and communities, including EJ populations and non-EJ populations. Cincinnati's West End, now partitioned into the Queensgate and West End neighborhoods, is an area with known EJ populations that was historically impacted by urban renewal plans that were common in the United States in the mid-twentieth century. Refined Alternative I (Concept I-W) requires one commercial relocation (a	Environmental Justice (4.1.7) Cumulative Effects (4.10.2)



ID	Name	No.	Comment	Response	Reference ¹
				small printing shop) in the West End neighborhood. In addition, the footprint of Refined Alternative I (Concept I-W) has been reduced and requires only minor amounts of strip right-of-way in the West End neighborhood. Refined Alternative I (Concept I-W) will not add to or exacerbate any adverse effects in the West End community from prior actions or events. In recognition of the history of City-sponsored urban renewal and the original Mill Creek Expressway (I-75) construction and as an enhancement in the West End neighborhood, ODOT will work with the City of Cincinnati, which includes the West End Community Council, to develop content for an interpretive display describing the West End community in relation to historic City urban renewal and the Millcreek Expressway construction and to identify a location in proximity to the I-75 corridor to install the display. Refined Alternative I (Concept I-W) will improve community cohesion; improve traffic flow and safety for all modes of travel; improve air quality; abate noise; reduce flooding and combined sewer overflows; improve aesthetics; and provide additional economic opportunities, which will help to offset any cumulative effects from past, present, and reasonably foreseeable actions. Therefore, no adverse cumulative effects on EJ populations are expected to occur as a result of Refined Alternative I (Concept I-W).	
		B-60-6	02/20/2024 - I have all night until eight. I'm kidding. Thank you again for being here. I hope that you're hearing what you're listening to. Just a few follow up. Based upon the presentation tonight and what the public is trying to say to you noted two historic sites that will be impacted, but to my eye, both looked post- colonial. And so my question for your feedback is, did you consult with any of the Algonquin speaking indigenous people in the area about impacted historic sites? Was that part of your assessment?	FHWA consulted with 13 Federally Recognized Tribes in accordance with Section 106 of the National Historic Preservation Act, as amended, and the implementing regulations at Title 36 of the Code of Federal Regulations part 800: Protection of Historic Properties in November 2022 and August 2023. No concerns related to Federally Recognized Tribes were raised during the consultation process.	Tribal Coordination (4.5.5)



ID	Name	No.	Comment	Response	Reference ¹
		B-60-7	02/20/2024 - Also, specifically to Ohio Department of Transportation, on your website, you have a very useful tool where one can select on any county and see what projects ODOT has going on there. What I found interesting, though, was that this project, which is easily the most expensive, I don't know about where it ranks in terms of footprint. I'm guessing it's probably up there, if not the biggest. And yet it's on the third page. A user has to go through the first two pages of Hamilton County projects, most if not all of which have a price tag on them, 2 million, 40 million, et cetera. This project, which was what, 3.9 billion? Was it with a "b", no price tag, and it's on the third page. What are you hiding? Why are you burying it? Why aren't you giving the most expensive project? Why aren't you giving the public the most accessible pathway to participating in it instead of burying it?	Projects on ODOT's website are generally sorted by the project identification (PID) number. Because the BSB Corridor Project originated many years ago, it has an older PID number and automatically sorts further down in the project list. Based on the feedback received from this commenter, the BSB Corridor Project was moved to the top of the both the Hamilton County and statewide lists of projects prior to the conclusion of the in-person hearing in which this comment was offered. The project cost estimate of \$3.6 billion was also added to the ODOT project page. The ODOT website has automatically redirected to the project website (www.brentspencebridgecorridor.com) since 2022. The project and provides forms where interested persons can sign up for the project mailing list to be kept informed about the most up-to-date project information.	Public and Stakeholder Involvement (5.1)
		B-60-8	02/20/2024 - Also, about the supplemental environmental assessment, I noticed and therefore have a question. Why do you use euphemism to talk about the negative impacts of the project and dysphemism to talk about the positive mitigations? This obviously is intended to bias the public's perception. It's a disingenuous use of language. The project should be able to stand on its own.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. The language in the environmental documents prepared for the BSB Corridor Project is consistent with applicable regulations.	Introduction (1.)



ID	Name	No.	Comment	Response	Reference ¹
		B-60-9	02/20/2024 - Finally, will you redo the environmental justice engagement with the support of community engagement professionals.	The project has incorporated robust engagement of EJ populations. Opportunities for EJ communities to offer feedback about the project occurred during 16 targeted EJ/neighborhood outreach meetings in late 2022 and open-house project update meetings in August 2023. All meetings were attended by residents of the targeted neighborhoods. Community members generally supported the refinements, mitigation, and enhancements incorporated into Refined Alternative I (Concept I-W), including the reduction of the project footprint, the incorporation of additional noise/visual screening barriers, measures to reduce flooding and combined sewer overflows, new and improved multimodal facilities, additional developable land, and aesthetic features. During the EJ outreach comment period, community members offered additional feedback and suggestions. Every comment was evaluated by the project team incorporated several refinements into Refined Alternative I (Concept I-W) in direct response to the comments received. Unanticipated additional impacts on EJ populations were not identified during the EJ outreach. Minority and low-income individuals were provided the opportunity to review the supplemental EA, attend inperson and virtual public hearings, and provide comments to KYTC and ODOT during the 30-day public availability of the supplemental EA and the public hearings were delivered to nearly 50,000 mailboxes in the EJ study area. Public involvement will continue to occur during the design and construction of the project. Furthermore, KYTC and ODOT will continue to act as liaisons to the communities immediately affected by the project.	Environmental Justice (4.1.7) Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)



ID	Name	No.	Comment	Response	Reference ¹
B-61	Townsend- Small, Amy	B-61-1	02/20/2024 - I'm a professor in environmental studies program at UC, also speaking on my own behalf. My expertise is greenhouse gas emissions and climate change. I'm also a resident of Covington. I live in this neighborhood just a few blocks south of here, adjacent to exit 191 on I-71/I-75. My primary concern with the plan is that it would lead to increased traffic.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8)
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model.	
				Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-61-2	02/20/2024 - Transportation is the leading source of greenhouse gas emissions in the United States. Most of these emissions come from: number one, personal use cars and	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The	Greenhouse Gases and



ID	Name	No.	Comment	Response	Reference ¹
			number two, trucks. In order for the United States to meet our Paris Agreement goals, we need to reduce transportation emissions. That's our biggest problem with greenhouse gas emissions. We cannot do this by making it easier for people to drive their cars.	greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change. Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	Climate Change (4.7)
		B-61-3	02/20/2024 - I'm also concerned about increased noise from increased traffic. Noise pollution negatively affects my neighborhood, which is the neighborhood we're in right now, as well as Devou Park, which is one of our	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the Covington portions of the project corridor in a <u>Traffic</u> <u>Noise Impact Analysis: Brent Spence Bridge Corridor</u> <u>Project Kentucky – Northern Section</u> (August 2023) and a	Noise - Kentucky (4.8.1)



ID	Name	No.	Comment	Response	Reference ¹
			region's best resources for backcountry hiking and biking. Noise abatement in the plan won't be sufficient to prevent noise pollution in the park, which is above the noise abatement walls.	 Noise Analysis Technical Memorandum Kentucky – Northern Section (November 2022). As a result of those studies, KYTC is proposing noise barriers in Covington on the west side of I-71/I-75 from West 3rd Street to south of Hermes Avenue, which includes the area that is adjacent to exit 191 on southbound I-71/I-75 (identified as the commenter's area of residence). In accordance with KYTC's noise policy, only noise sensitive receptors within 500 feet of the project corridor were analyzed for noise impacts. The noise studies concluded that the proposed noise barriers on the west side of I-71/I-75 will result in a 4 to 5-decibel reduction in noise levels in the portions of Devou Park that are within 500 feet of the project corridor. KYTC is also going above and beyond its noise policy and proposing a noise/visual screening barrier on the east side of I-71/I-75 from Pike Street to West 4th Street, which is the neighborhood in which the public hearing venue referenced in the comment is located. During detailed design, and in accordance with the KYTC <i>Noise Analysis and Abatement Policy</i>, a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise and noise/visual screening barriers (benefitted receptors) at each location where they are proposed in Kentucky. 	
		B-61-4	02/20/2024 – In summary, I think a congestion pricing fee that encourages out of state trucks to take interstate 275 instead of a companion bridge is a better alternative. Thank you.	Congestion pricing is a form of tolling. Previous tolling studies conducted by KYTC and ODOT indicate tolling the BSB Corridor would not meet the project purpose and need due to unmet travel demand. In addition, tolling would cause traffic diversion in local communities. The studies showed increased traffic primarily on the bridges crossing the Ohio River in the immediate vicinity of the cities of Covington, Cincinnati, and Newport with lower traffic diversion to I-275. During previous tolling studies for the BSB Corridor Project, local interests concentrated primarily in northern Kentucky expressed concern about the impacts of tolling and associated traffic diversion. In	Funding (1.2.1)



ID	Name	No.	Comment	Response	Reference ¹
				response to these concerns, the Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. Therefore, tolling the existing BSB is not considered to be a reasonable alternative for the BSB Corridor Project, and the project does not include tolling. Previous study efforts related to tolling are posted on the "Documents" page of the project website under the years 2013, 2014, and 2015.	
B-62	Dziad, Lynn	B-62-1	02/20/2024 - I apologize. I wasn't prepared to do this today, so excuse my rambling. I first moved to the Mainstrasse area 20 years ago. We endured the cut-in-the-hill. I'm sure that there are very few of us in this room that believe now that was a benefit. At the time, Mainstrasse was asking itself, who are we and why do people want to live here? The results, and there may have been a consultant involved, turned out to be a mixture of walkability, residential and small business. It's where people want to be. It's where people want to live. It's why I bought here. It's because people don't want to be in a suburb. They don't want to be split off from downtowns that eventually die. They don't want big roads in between where they go. We go to Devou Park. People come to Mainstrasse to enjoy our history and our festivals. I've heard things today like maybe combined into further projects.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several enhancements to further benefit surrounding communities. Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks. Aesthetic enhancements, noise reduction measures, and drainage improvements have also been incorporated into Refined Alternative I (Concept I-W). As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit on community cohesion.	Neighborhood and Community Cohesion (4.1.2) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
		B-62-2	02/20/2024 - By the way, one of your signs back there has a current sidewalk through way going through my yard. It's not real at all. I'm next to a parking lot which is full of cars which nobody from the city can even agree on who rents it to whose business' cars.	Based on the feedback provided by the commenter, it was determined that an existing sidewalk trail in Covington and outside of the limits of the Brent Spence Bridge (BSB) Corridor Project was incorrectly shown on the multimodal enhancements exhibit at the public hearing. An existing sidewalk trail connecting the shared-use path along the Ohio River and the Goebel Park Complex (generally located along Bakewell Street and the area described by the commenter does not exist and has been removed from the exhibit. Corrected versions of the exhibit have been posted on www.PublicInput.com/bsbc and the project website (www.brentspencebridgecorridor.com).	Travel Patterns and Access (4.1.4)
		B-62-3	02/20/2024 - Noise equals depression, health concerns. We're here because it's a neighborhood, not because we want it to be at an underpass. We appreciate the addition of the noise barrier that you've just put up there.	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the Covington portions of the project corridor in a <u>Traffic</u> <u>Noise Impact Analysis: Brent Spence Bridge Corridor</u> <u>Project Kentucky – Northern Section</u> (August 2023) and a <u>Noise Analysis Technical Memorandum Kentucky –</u> <u>Northern Section</u> (November 2022). As a result of those studies, KYTC is proposing noise barriers on the west side of I-71/I-75 from West 3 rd Street to south of Hermes Avenue and on the east side of the highway from south of Edgecliff Road to Pike Street. KYTC is also going above and beyond its noise policy and proposing a noise/visual screening barrier on the east side of the highway from Pike Street to West 4 th Street. These proposed noise barriers and noise/visual screening barrier will provide sound reduction within the City of Covington, which is the area referenced by the commenter. During detailed design, and in accordance with the KYTC Noise Analysis and Abatement Policy, a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise and noise/visual screening barriers (benefitted receptors) at each location where they are proposed in Kentucky.	Noise - Kentucky (4.8.1)



ID	Name	No.	Comment	Response	Reference ¹
	Name	B-62-4	O2/20/2024 – But we need more pools, not less, more trees, more bats, not less. The swamp that's down there now is why the bats are here. We prefer that you fix things, not cause more damage.	Refined Alternative I (Concept I-W) will acquire 2.84 acres of permanent right-of-way and 0.07 acre of temporary easement from the Goebel Park Complex. The land to be acquired includes 0.50 acre in Kenney Shields Park, which is currently being utilized for two basketball courts and associated resources such as parking and sidewalks providing access to the courts. The land acquisition also includes 2.34 acres in Goebel Park. This land is low-lying, prone to flooding, and contains a mixture of mown grassy areas and groups of mature trees. The recreational use of the land to be acquired in the Goebel Park portion of the complex consists of a 360-foot section of walking trail that stretches through the complex. Interstate widening will also place the highway lanes closer to the park, which will result in proximity impacts to an outdoor pool. To mitigate impacts to the Goebel Park Complex, KYTC is returning 2.23 acres of land that is currently occupied by the West 5 th Street ramp to the park. Other impacts to the Goebel Park Complex will be mitigated through reconstruction of the walking trail within the complex and funding for the development of a new Goebel Park Master Plan, and replacement and enhancement of the basketball courts or other outdoor recreational facilities in the park. To mitigate impacts to the outdoor pool, approximately \$1,337,400 of project funds will be allocated to the construction of a new outdoor pool and associated facilities or other comparable aquatic facility serving the same recreational purpose within the Goebel Park Complex to be established during the new master planning process facilitated by the City of Covington. Given the identified mitigation measures, the Goebel Park Complex will continue to provide an outdoor pool or a comparable aquatic facility for community use. In addition, the 2.23 acres of replacement land will be at a higher	Reference ² Threatened or Endangered Species (4.2.4) Goebel Park Complex (4.13.3)
				elevation than the impacted area, which will reduce flooding in the park. Refined Alternative I (Concept I-W) will disturb or remove 4.38 acres of riparian forested habitat, which will result in the loss of potential foraging areas for the federally	



ID	Name	No.	Comment	Response	Reference ¹
				endangered gray bat. Approximately 90.00 acres of forested habitat that will be removed by Refined Alternative I (Concept I-W) may serve as foraging or maternity areas for federally endangered Indiana bats; suitable habitat for the federally endangered northern long-eared bat. Impacts to the Ohio state listed endangered little brown bat and tricolored bat are also expected due to tree removal in Ohio. No evidence of potential hibernacula in proximity to the project or use or presence of bats along the bridges in the project area was found. The tricolored bat has also been proposed for listing as a federally endangered species.	
				Refined Alternative I (Concept I-W) incorporates several measures to minimize and mitigate effects on the Indiana bat, gray bat, the northern long-eared bat, little brown bat, and tricolored bat. Ohio and Kentucky follow separate policies, programmatic agreements, and regulations concerning these species; therefore, each state will incorporate separate minimization and mitigation measures.	
				In Kentucky, the mitigation measures include providing a contribution to the Imperiled Bat Conservation Fund, which will offset project-related impacts to terrestrial habitats by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts. Tree removal in Kentucky will be minimized, and no tree removal will occur from June 1 to July 31 when federally listed bats may be using those habitats. In addition, measures to protect stream areas in Kentucky will be implemented both during and after construction.	
				In Ohio, the mitigation measures include avoiding tree removal in excess of what is required to implement the project safely. No tree removal in Ohio will occur from April 1 through September 30, when federally and state listed bats may be using those habitats. Ohio standards and specifications related to lighting; dust control; and water quality, wetland, and stream protection will also	



ID	Name	No.	Comment	Response	Reference ¹
				minimize and mitigate effects to federally and state listed bat species.	
		B-62-5	02/20/2024 – When I first bought my house around 2001, the first design came out shortly thereafter, quietly. Just a large graphic online. And that was when we discovered that the 5 th Street exit in Covington had been completely cut off from your plans. It took community fighting to get those exits and entrances back. So, I'm just here to remind everyone, please don't stop with whatever they're offering. There are alternatives if we keep pushing. Don't accept the midland promises that sound like a promise, but really aren't. And maybe we'll put something comparable to a pool back. What we have here is a jewel and we need to protect it and fight for it.	Public involvement and agency coordination have continued since the approval of the 2012 Environmental Assessment and Finding of No Significant Impact. Efforts have included: updating the project website; establishing social media accounts; distributing e-newsletters; holding Project Advisory Committee, aesthetic committee, and aesthetic subcommittee meetings; conducting 12 small- scale and 4 broad-scale targeted environmental justice/neighborhood outreach meetings; holding 2 open- house style project update meetings; coordinating with consulting parties regarding the project's effects on historic properties; and coordinating with federal, state, and local agencies. Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. KYTC and ODOT have evaluated and responded to all comments received during the project's development. The design of Refined Alternative I (Concept I-W) has been refined in several locations in direct response to public comments. Based on preliminary investigations, several additional refinements suggested during public involvement activities may be feasible and will be evaluated during the proof-of-concept phase of the Phase III progressive design-build contract. Refinements that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	Travel Patterns and Access (4.1.4) Public Involvement and Agency Coordination (5.)
				received during the public availability of the supplemental	



ID	Name	No.	Comment	Response	Reference ¹
				Environmental Assessment. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments. Public and stakeholder outreach will continue throughout the design and construction of the project. As detailed in the project <i>Public Engagement Plan</i> , which is incorporated into the <i>Public Involvement Summary</i> (<i>January 2024</i>).	
		B-62-6	02/20/2024 - Just by way of an example. Yes, mass transit. Excellent. We have the South Bank Shuttle. It keeps a lot of traffic down from the stadiums and spreads it out to neighborhoods. People come and visit us on their way to and from games. It's a great thing. I think it should be enlarged tenfold and if the trucks would just circle around, we wouldn't have so much destruction to where we love to live. My third comment quickly. Can't remember the 2X bus is why I bought my house. It went to the airport. I was a flight attendant for 23 years and forced out of Florida when an airline closed. That 2X doesn't even come to Kentucky anymore. Goes from Cincinnati downtown to the airport. It's another suburb that got cut off.	The project purpose and need is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. This includes accommodating freight traffic that is using the interstate system. In 2005, KYTC and ODOT conducted a <i>Feasibility and Constructability Study of the Replacement/Rehabilitation of the Brent Spence Bridge</i> . Among other considerations, the study evaluated the impacts and costs of prohibiting all through trucks on the existing BSB. The study concluded that the issue of diverting trucks from the existing BSB has regional implications in terms of increased traffic on a number of travel corridors, and such prohibitions would increase costs to the users. In 2007, and as part of a separate study, the Ohio- Kentucky-Indiana Regional Council of Governments (OKI), the Metropolitan Planning Organization (MPO) for the area completed a <i>Brent Spence Bridge Truck Ban Analysis</i> . A ban on through trucks on the northern Kentucky portion of I-71/I-75 was found to have no substantial benefits. The volumes of diverted traffic were relatively small compared to the overall volume, and the impact on severe crashes within the system was minor. Furthermore, operating costs to the trucking industry would negatively impact the region. The deployment of a	Purpose and Need (2.) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				truck ban would also present difficulties in terms of enforcement. Therefore, diverting truck traffic would not be effective and is not considered to be a reasonable alternative for the BSB Corridor Project.	
				In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanding transit routes would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project. The BSB Corridor Project addresses the highway component of the Initiative.	
				The transit component included in the Initiative must be developed and championed regionally, and ODOT and KYTC are ready to support this when it is advanced at a regional level.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	



ID	Name	No.	Comment	Response	Reference ¹
B-63	Baker, Nick	B-63-1	02/20/2024 – I'm representing the Holiday Inn Cincinnati Riverfront in Covington, just a few streets away. Mine are more questions, you know. I'm being asked a lot of questions by our revenue management teams, our ownership companies, how it's going to impact, how much, or, you know, what the value of the hotel is, you know, if they're looking to sell it, whether or not it's a good time to sell, whether it's a good time to hold. So, what's the immediate impact to the hotels, to the hotel community? How many room-nights can we expect from construction companies, you know, from planning teams, you know? All different phases of the project, you know.	The Holiday Inn Cincinnati Riverfront in Covington will not be directly impacted by Refined Alternative I (Concept I-W). Determining information regarding revenue, property value, market factors, and utilization by construction crews for this specific business or the hotel community is beyond the scope of the Brent Spence Bridge (BSB) Corridor Project. Therefore, no response, other than to document the comment as received, can be provided. Businesses and individuals interested in working on the project or provide services to project personnel may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Economy and Employment (4.1.6)
		B-63-2	02/20/2024 - And then also I would like to see the visual and the noise barrier go a little bit further down towards Third Street where we're at, because we do get a lot of complaints already on highway noise where we're located, right there on Third Street. So, if at all possible, we can think about the visual and the noise barrier going down a little bit further.	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the Covington portions of the project corridor in a <u>Traffic</u> <u>Noise Impact Analysis: Brent Spence Bridge Corridor</u> <u>Project Kentucky – Northern Section</u> (August 2023) and a <u>Noise Analysis Technical Memorandum Kentucky –</u> <u>Northern Section</u> (November 2022). Those studies concluded that a noise barrier would not benefit any of the noise sensitive receptors west of I-71/I-75 in the vicinity of West 3 rd Street, which includes the area where the Holiday Inn Cincinnati Riverfront in Covington is located. Because a noise barrier was not determined to be either feasible or reasonable, KYTC is not proposing either a noise barrier or a noise/visual screening barrier in this area.	Noise - Kentucky (4.8.1)



ID	Name	No.	Comment	Response	Reference ¹
		B-63-3	02/20/2024 - And then my other thing is just the frustration on how long it's taken. So, I know I started back here. I worked in 2011, 2013 in Covington, was talked about 2015 in Covington and then again 2023. And they just keep on asking, when is this bridge project going to get started? When's this bridge project going to get started? So, I think people are ready for it to either get started or how many more hearings do we have to have? Let's just get started. But appreciate all you guys do. Thank you very much.	Detailed cost estimates were developed for the 2012 Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) and were an important consideration in the identification of the selected alternative (Selected Alternative I). In accordance with standard practice for preliminary project development, specific funding mechanisms were not identified at that time. Once the 2012 EA/FONSI were finalized, KYTC and ODOT began the next steps to identify specific funding mechanisms for the project. At the same time, KYTC and ODOT conducted additional studies and to identify ways to reduce project costs and impacts, further improve the project design, and provide additional benefits. These combined efforts culminated in a set of refinements to Selected Alternative I (from the 2012 EA/FONSI) that have been designated Refined Alternative I (Concept I-W) and are the focus of the supplemental EA.	Project Description (1.1) Project History (1.2)
				In 2021, ODOT secured the funding to complete detailed design and prepare contract plans for Phases I and II of the project. ODOT also secured the funding to construct Phase II beginning in 2026. In November 2021, the United States Congress passed the Infrastructure Investment and Jobs Act – also known as the "Bipartisan Infrastructure Law" – which created new programs to fund key infrastructure priorities and create more funding opportunities for local governments. In December 2022, KYTC and ODOT received federal funding grants worth \$1.635 billion for the remaining elements of the project and have since developed detailed funding plans for their portions of the project costs.	
				With the necessary funding currently in place and anticipated approval of the supplemental EA in the first half of 2024, construction on Phase III of the BSB Corridor Project (Dixie Highway in Kentucky to Linn Street in Ohio) is expected to begin in 2025 and be substantially complete by 2030. Construction on Phase II (Linn Street to Findlay Street in Ohio) is expected to begin in 2026 with completion in 2031. Construction of Phase I	



ID	Name	No.	Comment	Response	Reference ¹
				(Findlay Street to Marshall Avenue in Ohio) is expected to begin in 2029 and be completed in 2032.	
B-64	Butler, Matt	B-64-1	02/20/2024 - I'm Matt Butler with the Devou Good Foundation. The SEA erroneously discounts the project's harms to nearby minority residents. The supplemental environmental assessment attempts to discount environmental justice concerns regarding disproportionate adverse impacts on minority communities by claiming any harm to minority populations will not be predominantly borne by majority populations and are not appreciably more severe or greater in magnitude than those experienced by non- minority populations. This completely ignores the fact that the states and the region are highly segregated and the fact that the residents in these minority neighborhoods are already disproportionately harmed by existing pollution.	 An Environmental Justice Analysis Report (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on environmental justice (EJ) populations. The EJ analysis was conducted in accordance with the U.S. Department of Transportation Order 5610.2C and FHWA Order 6640.23A, which define disproportionately high and adverse effects. The EJ analysis also followed FHWA's <i>Guidance on Environmental Justice and the National Environmental Policy Act (NEPA)</i> (December 16, 2011). As part of the EJ analysis, demographic characteristics for U.S. census block groups in the EJ study area were determined using 5-year census data from the American Community Survey (ACS) for 2016-2020 and were compared to demographic data for the states, counties, cities, and EJ study area to identify the presence of EJ populations. The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on EJ populations: No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; No disproportionately high and adverse relocation, noise, or temporary construction effects; and Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved acess, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood. 	Environmental Justice (4.1.7)



ID	Name	No.	Comment	Response	Reference ¹
				2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone. In addition, a <u>Quantitative MSAT Analysis Report</u> (August 2023) concluded that Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on mobile source air toxics (MSAT) emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the EJ study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the EJ study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Twenty (20) percent of the census block groups with minority and/or low-income populations in the EJ study area are in Kenton County; therefore, the slightly greater level of PM2.5 when the 2050 build scenario is compared to the 2050 no-build scenario will not be predominately borne by EJ populations nor is it appreciably more severe or greater in magnitude than the level of PM2.5 emissions for the non-EJ population.	
		B-64-2	02/20/2024 - I'm requesting ODOT do a full EIS.	The analysis documented in the supplemental Environmental Assessment (EA) has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in Title 40 of the Code of Federal Regulations (CFR) section 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA	N/A



ID	Name	No.	Comment	Response	Reference ¹
				determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	
		B-64-3	02/20/2024 - In census tracts 607, 650, 651 which straddled the eastern side of the Brent Spence Bridge Corridor expansion area in Covington, black residents reside in a greater proportion, 14.1, 13.1 and 33.1% than their share of the city's population and in a much greater proportion than their share of the state's population and census tracts 616, 650, 616, which straddled the western and eastern sides of the Brent Spence Bridge Corridor expansion area in Covington, Hispanic residents reside in a greater proportion, 17.5, 12.6 and 9.6%, than their share of the city's population and in a much greater proportion than their share of the state's population. And in census tracts 263-2692 and 264, which straddle the eastern and western side of the Brent Spence Bridge Corridor expansion area in Cincinnati, black residents reside in a greater proportion than their share of the city's population and in a much greater proportion than their share of the state's population.	The EJ analysis for the supplemental EA was conducted in accordance with all applicable federal and state guidelines. Where differences in methodology occur, the most conservative and inclusive approach was followed. The <i>Environmental Justice Analysis Report</i> provides a detailed description of the methodology employed in the analysis of the effects of Refined Alternative I (Concept I-W) on EJ populations. The demographic makeup of the EJ study area was identified using census data from the 5-year American Community Survey estimates for 2016-2020. Demographics were analyzed at the block group level, as defined by the U.S. Census Bureau 2020 decennial census geographic boundaries. Census block groups are a smaller geographic area than census tracts and allow for a more detailed and targeted EJ analysis. In accordance with Executive Order 12898 and the <i>Promising Practices for EJ Methodologies in NEPA Reviews: Report of the Federal Interagency Working Group on Environmental Justice & NEPA Committee</i> (Promising Practices Report) (March 2016), minority and low-income populations within the EJ study area were identified using a meaningfully greater analysis. The meaningfully greater than the minority or low-income populations within an established reference community. For this project, the EJ study area was chosen as the reference community, and any percentage higher than the reference community, and any percentage higher than the reference community, and FHWA define low-income	Environmenta Justice (4.1.7)
				as a person whose median household income is at or	



ID	Name	No.	Comment	Response	Reference ¹
				below the Department of Health and Human Services guidelines. The EJ analysis for the supplemental EA designates low-income as 1.99 times the poverty thresholds established by the U.S. Census Bureau. This represents a more inclusive definition for low-income that exceeds the minimum federal poverty guidelines and represents a strong commitment by KYTC and ODOT to going above and beyond in addressing EJ on the Brent Spence Bridge Corridor Project.	
				Minority populations are concentrated in the southeastern portion of the EJ study area in Kentucky and throughout the EJ study area in Ohio. Low-income populations are broadly dispersed throughout the EJ study area and are located directly adjacent to the project corridor. Mapping showing the locations of census block groups with minority and low-income populations in the EJ study area is included in the supplemental EA.	
B-65	Mangan, Sue	B-65-1	02/20/2024 - I'm here as a resident of Cincinnati and my major emphasis is to support everything you can do to be more as much as environmentally conscious as possible. I like what I'm seeing about the drainage and stormwater improvements and the impact of wetlands and streams.	The commenter's support for the mitigation and enhancement measures incorporated into the Brent Spence Bridge (BSB) Corridor Project has been included in the project record.	N/A
		B-65-2	02/20/2024 - I also am concerned about neighborhoods that were negatively impacted in the last bridge and reconnecting those neighborhoods and offering them more opportunities to become part of the city instead of separate from the city.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several enhancements to further benefit surrounding communities. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	Purpose and Need (2.) Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2)



ID	Name	No.	Comment	Response	Reference ¹
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
		B-65-3	02/20/2024 - I like seeing that you have a lot of walk paths and bike trails, mixed use bike and walk paths incorporated in your plans. I would hope that you can keep those as separate from the road as possible for safety reasons and just to make people more inclined to use them.	In support of the KYTC <i>Complete Streets, Roads, and</i> <i>Highways Policy</i> , the ODOT <i>Multimodal Design Guide</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments <i>Regional Complete Streets Policy</i> , Refined Alternative I (Concept I-W) will promote safety for bicyclists and pedestrians. The frontage roads and ramp connections with local streets are being designed as lower-speed urban roadways, which will encourage drivers to decelerate to safe speeds prior to reaching bicycle and pedestrian crossings. Furthermore, the buffer distance between automobile traffic and sidewalks and shared-use paths will be increased, improving bicyclist and pedestrian safety and comfort.	Refined Alternative I (Concept I-W) and Purpose and Need (3.9)
		B-65-4	02/20/2024 - I am wondering about the infrastructure going across the Western Hills Viaduct that I would hope that you would include in that infrastructure the potential for rail to be installed there eventually. It's my understanding that can happen if you include	The bridges that carry traffic across the Western Hills Viaduct to Central Parkway are being designed and constructed as part of the Western Hills Viaduct project, a separate project with independent utility and completed environmental review that is being developed by the City of Cincinnati. ODOT is coordinating design and	Project Description (1.1)



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			that in your infrastructure for the Western Hills Viaduct.	construction of the Western Hills Viaduct project with the design and construction of the BSB Corridor Project.	
B-66	Ankrum, Andrea	B-66-1	02/20/2024 - I'm with the northern Kentucky Sierra Club, which is an environmental group. We all know that the Brent Spence Bridge needs to be overhauled, upgraded and improved. I-71/75 is a major north south cargo route with millions of cars and trucks traveling this route every year. This produces a lot of traffic-related air pollution or trap and affects those living closest to the highway the most. The air pollution is increased when traffic backups occur, which is a routine occurrence near the Brent Spence Bridge. In order to reduce the negative health effects of traffic. Traffic needs to flow across the Brent Spence Bridge with minimal backups. This project is important.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Refined Alternative I (Concept I-W) will reduce congestion and improve traffic operations throughout the project area. Air quality studies concluded that Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	Purpose and Need (2.) Traffic (3.8) Air Quality (4.6)
		B-66-2	02/20/2024 - We appreciate the environmental considerations that are discussed in the Environmental Assessment report and request that the best management practices outlined in the plan are strictly followed in order to limit the potential impact of the environment during construction. We request that an independent group be allowed to monitor the BMPs and construction activities to ensure that all plans are being implemented and adhered to. This includes, but is not limited to, erosion control to protect water quality, minimizing tree removal and habitat loss for wildlife, management of oil spills, protection of groundwater, monitoring of stormwater to ensure proper management of interstate runoff, and temporary impact to air quality.	Environmental commitments have been incorporated into the project include best management practices (BMPs) to ensure continuous erosion control throughout the construction and post-construction period; minimizing tree removal and associated habitat loss; preparing a Spill Prevention Control and Countermeasures Plan during construction; preparing a groundwater protection plan during construction; the separation of interstate runoff in the project area from existing combined sewers in Kentucky and Ohio; implementing a dust control plan during construction, and implementing an ambient air quality monitoring program during construction. Per Title 23 of the Code of Federal Regulations section 771.109(b)(1), KYTC and ODOT, in cooperation with FHWA, are responsible for implementing mitigation measures stated as commitments in the supplemental Environmental Assessment and the final environmental decision documents unless FHWA approves of their deletion or modification in writing. FHWA will ensure that	Environmental Commitments (Section 6. and ES-Table II)

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				this is accomplished as a part of its stewardship and oversight responsibilities.	
				The Brent Spence Bridge (BSB) Corridor Project has been designated a Major Project by FHWA. As such, Title 23 of the United States Code section 106(h)(2) requires the development of a <i>Project Management Plan</i> . For more information about <i>Project Management Plans</i> , please visit: <u>https://www.fhwa.dot.gov/majorprojects/pmp/index.cfm</u> .	
				KYTC, ODOT, and FHWA have developed a <i>Project</i> <i>Management Plan</i> for the BSB Corridor Project, which will be updated as the project phases advance. Among other items, the <i>Project Management Plan</i> establishes protocols for environmental compliance monitoring.	
				Per the BSB Corridor <i>Project Management Plan</i> , ODOT and KYTC will meet all commitments and project-specific mitigation and enhancement items included in the project's environmental clearance. The ODOT project managers for the Phase I, Phase II, and Phase III contracts and the KYTC project manager for the Phase III contract will track and enforce implementation of the environmental commitments listed in the supplemental Environmental Assessment and the final environmental decision documents.	
				Compliance with the environmental mitigation and enhancement commitments for the BSB Corridor Project will be evaluated and documented by the ODOT project managers for Phase I, Phase II, and Phase III following completion of the final design and construction phases of each contract.	
				The project mitigation measures and environmental commitments (including permits) will be reviewed at the pre-construction meetings with ODOT's construction staff, KYTC's construction staff, and the contractors. The BSB Corridor Project will be reviewed during construction by ODOT's district staff and KYTC's district staff to ensure that the mitigation measures and environmental commitments are carried out and to determine if additional mitigation measures and environmental	



addition, monthly status Il include updates on nmental commitment	
nce with the project's /ill be made publicly ones during the design and nase II, and Phase III	
d air quality impacts are st and mobile source quipment and increased ic congestion during ommitments have been o minimize and mitigate ts. Temporary air quality llowing federal, state, and st and emission controls. velop and implement an program for sensitive areas orridor, including areas arks and recreation areas, ls related to the ambient air l be determined during tions, times, and durations cols to address any Ambient Air Quality ey be observed; and how ata will be made available website will provide regular ntenance of traffic plans, ing changes, etc. The address and phone number	B-66-3 02/20/2024 - The plan discusses the implementation of an ambient air quality monitoring program and a dust control plan for sensitive areas in the corridor, including areas utilized by children and environmental justice communities. Air quality monitoring is extremely important to ensure construction activities are not negatively impacting the local population, and this data should be available the public in real time. We support a Brent Spence Bridge project that is conscientious of the environmental impact that construction activities have on the local population, land, and wildlife. We look forward to understanding how the project will communicate with the local community about how the best management practices will be monitored and enforced. Thank you.
dus affi l cc t to act fol dus dev fol dus dus dev fol dus dus dus dus dus dus dus dus dus dus	implementation of an ambient air quality monitoring program and a dust control plan for sensitive areas in the corridor, including areas utilized by children and environmental justice communities. Air quality monitoring is extremely important to ensure construction activities are not negatively impacting the loca population, and this data should be available the public in real time. We support a Brent Spence Bridge project that is conscientious of the environmental impact that construction activities have on the local population, land, and wildlife. We look forward to understanding how the project will communicate with the loca community about how the best management practices will be monitored and enforced.



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B-67	Keller, Jim	B-67-1	02/20/2024 - I'm a resident of Kentucky. We live on the Fort Mitchell, Fort Wright borderline, and in the last 27 years we've lived there, our noise levels have increased dramatically. This seems like a perfect time to address noise levels, but I'm not confident of the studies that have been done so far. I'd like to know what role terrain plays in the noise assessment because we live on a hillside and the interstate is elevated, but I think there's some misrepresentation of numbers there. I would like to have some more information about.	The commenter did not provide a specific address or location. Therefore, only a general response regarding noise in the vicinity of the boundary between Fort Mitchell and Fort Wright can be provided. KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the Fort Mitchell portions of the project corridor in a <u>Traffic Noise</u> <u>Assessment: Brent Spence Bridge Corridor Project</u> <u>Kentucky Southern Section</u> (August 2023). The noise analysis methodology accounts for the elevations of noise sensitive receptors as well as the vertical and horizontal alignment of the roadways. As a result of that study, KYTC is proposing noise barriers on southbound I-71/I-75 from Dixie Highway to Kyles Lane. Both of these locations extend into portions of Fort Mitchell and Fort Wright. KYTC also prepared a <u>Technical Memorandum</u> : <u>Additional Traffic Noise Assessment Kentucky Southern</u> <u>Section</u> (February 2023) that evaluated extending the noise analysis area further west to include a noise barrier for residences in the vicinity of Summit Lane in the Fort Mitchell Heights subdivision. The technical study also evaluated extending noise barriers to provide noise reduction for additional businesses with exterior uses, a hotel, and a day care center west of I-71/I-75 between Kyles Lane and Dixie Highway. Both of these locations are near the Fort Mitchell/Fort Wright boundary. Based on the evaluation, KYTC determined that extended noise barriers in these areas were not reasonable nor recommended. During detailed design, and in accordance with the KYTC <i>Noise Analysis and Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise and noise/visual screening barriers (benefitted receptors) at each location where they are proposed in Kentucky.	Noise - Kentucky (4.8.1)



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		B-67-2	02/20/2024 - I also know that our streets, just tonight, that our streets on the historic district is not on the historic district map is designated to Fort Mitchell, but we are a historic district. I don't if that matters, if that makes any difference.	Cultural resources in the project's area of potential effects were evaluated in accordance with Section 106 of the National Historic Preservation Act of 1966 (Section 106) and implemented through Title 36 of the Code of Federal Regulations (CFR) part 800. In 2022, the area of potential effects in Kentucky was updated to encompass the most recent disturbance limits for Refined Alternative I (Concept I-W). The Fort Mitchell Heights Historic District, which is in the area referenced by the commenter, is located outside of the 2022 area of potential effects and was not assessed in the 2022 cultural resources studies. As a result, it was not shown on mapping on display at the public hearings.	Area of Potential Effects (4.5.1) History/ Architecture Resources (4.5.2)
		B-67-3	02/20/2024 - My final question is about the cost for benefited receptor. In the information that we receive, that cost has been anything between \$14,356 and \$40,000 per benefited receptor. So, I'd like some clarification about that, please, and I would like the opportunity to discuss with the transportation cabinet at any time that's possible.	To be cost effective, the KYTC <i>Noise Analysis and</i> <i>Abatement Policy</i> has established \$40,000 as a reasonable maximum threshold for the cost per benefited receptor (CBR). The CBR is defined as follows: CBR = (Cost of Noise Barrier (\$)/Number of Benefited Receptors) where (1) the cost of noise barrier is the total anticipated cost of the noise barrier including design, right-of-way, utilities, and construction. For the noise analyses prepared for the Brent Spence Bridge Corridor Project, an average cost of \$32 per square foot of barrier wall was assumed and (2) the number of benefited receptors is the total number of receptors receiving a noise reduction of at least 5 decibels (A-weighted scale).	Noise - Kentucky (4.8.1)
B-68	Baer, Logan	B-68-1	02/20/2024 - I'm a resident here in northern Kentucky, actually in Newport, but I use this bridge all the time. I come to Covington all the time. So, I guess I just had a few questions for ODOT and KYTC. In particular, looking at the I- 65 Abraham Lincoln Bridge project in Louisville. They doubled the size of the bridge like we're trying to do here, but as a result they need to pay for it. They put a toll on the bridge and then traffic numbers halved from prior to the construction to afterwards. Fewer cars were	The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. The Brent Spence Bridge (BSB) Corridor Project does not include congestion pricing because it is a form of tolling and is therefore prohibited in Kentucky.	Funding (1.2.1)



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			going over the bridge, even though the toll was not necessarily targeting everyone equally. I just would like to know if KYTC, ODOT, or the federal DOT has thoroughly considered using tolling rather or congestion pricing to reduce unnecessary induced demand over the bridge.		
		B-68-2	02/20/2024 - In addition to that, I think it's a great question. Is there going to be capability for rail to be added in the future to this bridge? We have a major international airport in Covington and further off in Covington Airport. Will that ever be able to be connected downtown via this bridge?	In 2004, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation</u> <u>Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project. The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need	Purpose and Need (2.)
				to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	
		B-68-3	02/20/2024 - And in terms of the questions of safety, the real question on my mind is, yes, it seems like safety for motorists, but for frontage roads, are we going to be seeing things like bump outs? Are we going to be seeing traffic calming from off ramps? Because right now every off ramp, if you're walking around in, say, Mainstrasse, you're walking near the off ramp, they come off pretty fast, even if there is a traffic light there. So, I'd like to know if the	Refined Alternative I (Concept I-W) will improve vehicular safety by including measures to reduce congestion- related crashes. In addition, the collector-distributor roadway system will improve safety by separating through and local traffic and keeping them separate for longer distances, thus reducing weaving movements that increase the risk of crashes. The removal of left-hand exits and other design deficiencies such as substandard shoulders are also expected to improve safety and reduce crashes by further reducing weaving movements and by	Traffic (3.8) Refined Alternative I (Concept I-W) and Purpose and Need (3.9)



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			design of the frontage roads and the offramps will design for slower speeds, not just signage. That leaves that for the city to enforce poor design. Thank you for your time.	providing a larger buffer for vehicles. In addition, two existing one-way bridges on Ezzard Charles Drive over I-75 will be replaced with one combined two-way bridge to reduce the high number of wrong-way crashes occurring at this location. The <i>Interchange Modification Study</i> <i>Addendum</i> (December 2023) documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's <i>Interactive Highway Safety Design Model</i> . In support of the KYTC <i>Complete Streets, Roads, and</i> <i>Highways Policy</i> , the ODOT <i>Multimodal Design Guide</i> , and the OKI <i>Regional Complete Streets Policy</i> , Refined Alternative I (Concept I-W) will promote safety for bicyclists and pedestrians. The frontage roads and ramp connections with local streets are being designed as lower-speed urban roadways, which will encourage drivers to decelerate to safe speeds prior to reaching bicycle and pedestrian crossings. Furthermore, the buffer distance between automobile traffic and sidewalks and shared-use paths will be increased, improving bicyclist and pedestrian safety and comfort. Finally, lighting will be installed in underpass areas to improve safety and security for pedestrians and bicyclists.	
		B-68-4	02/20/2024 - Just one other thing I wanted to point out. One, the price tag. It is large. I know how the large projects often have large price tags.	A Cost, Schedule, and Risk Assessment workshop held by FHWA and the project team in October 2022 confirmed that the total project cost estimate is \$3.6 billion in the year of expenditure, which includes all costs required to deliver the project, including but not limited to planning, design, right-of-way acquisition, construction, construction management services, and agency labor.	Cost Estimates (3.6)
		B-68-5	02/20/2024 - I've been following the Bridge Forward project on the Cincinnati side. The proposal to do to 75/71 what we did with Fort Washington Way in, burying it, eventually capping it over to reconnect neighborhoods. But the proposal I've heard beyond minor engineering problems would be rejected, primarily because it would add around	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. Features incorporated into Refined Alternative I	Purpose and Need (2.) Alternatives (3.) Future Design Refinements (3.7)



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			\$150,000,000 extra. That's a big number, too. That would only be adding around 5% to the total project budget, which, knowing how these projects go, this will probably overrun that budget, too, because that's how government projects almost always work.	(Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices. Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing BSB for local traffic as part of the collector-distributor roadway system and a new double- decker companion bridge to the west for through (interstate) traffic. In addition, performance-based design principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District.	Neighborhood and Community Cohesion (4.1.2) Public Comments (5.1.1)
				Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract	



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				objectives, and have support at the local level may be incorporated into the project.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <u>Public Involvement Summary</u> (January 2024). During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
		B-68-6	02/20/2024 - One other thing is that in every projection of traffic flow, traffic numbers I have seen for the Brent Spence Bridge, going back to about the year 2000, every single one of them says that, hey, we're going to be around 180,000. We're going to be around 200,000. And I work in construction, so I might read these numbers wrong, but from what I've seen, the actual numbers today are much lower than that. Like missing the mark by nearly 80,000, maybe 90,000. Again, I'm not a science guy, but I would like to ask if anyone from ODOT, KYTC could get back to me on what the actual traffic numbers are, not what the projections are. Because every projection I've seen has been brutally wrong. And it seems like a self- fulfilling prophecy for traffic engineers to make an excuse for their own jobs.	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT, KYTC, and OKI. Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019. ODOT, KYTC, and OKI report traffic counts for the BSB on their websites; however, the average annual daily traffic reported by each agency are developed using different methods and count sources based on each agency's standard practices and procedures. In addition, the daily volume on the BSB varies substantially by the day of the week. Based on a review of the published average annual daily traffic volumes and continuous count data provided by OKI, the base year 2019 traffic volume on the BSB was determined to be approximately 160,000 vehicles per day.	Traffic (3.8)
				KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional	

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				travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange Modification Study Addendum</u> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				Traffic projections prepared during the preparation of the 2012 Environmental Assessment estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	
		B-68-7	02/20/2024 - And again, the induced demand, the congestion pricing. Thank you very much. Thank you for coming.	When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips).	Funding (1.2.1) Traffic (3.8)
				The <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	



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				The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. The BSB Corridor Project does not include congestion pricing because it is a form of tolling and is therefore prohibited in Kentucky.	
B-69	Seifert, Haley	B-69-1	02/20/2024 - I am a resident of Cincinnati as well as a student at the University of Cincinnati. The word safety has been thrown around here today, but whose safety are you actually concerned about?	Refined Alternative I (Concept I-W) will improve vehicular safety by including measures to reduce congestion-related crashes. In addition, the collector-distributor roadway system will improve safety by separating through and local traffic and keeping them separate for longer distances, thus reducing weaving movements that increase the risk of crashes. The removal of left-hand exits and other design deficiencies such as substandard shoulders are also expected to improve safety and reduce crashes by further reducing weaving movements and by providing a larger buffer for vehicles. In addition, two existing one-way bridges on Ezzard Charles Drive over I-75 will be replaced with one combined two-way bridge to reduce the high number of wrong-way crashes occurring at this location. The <i>Interchange Modification Study Addendum (December 2023)</i> documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's <i>Interactive Highway Safety Design Model</i> . In support of the KYTC <i>Complete Streets, Roads, and Highways Policy</i> , the ODOT <i>Multimodal Design Guide</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) <i>Regional Complete Streets Policy</i> , Refined Alternative I (Concept I-W) will promote safety for bicyclists and pedestrians. The frontage roads and ramp connections with local streets are being designed as lower-speed urban roadways, which will encourage drivers to decelerate to safe speeds prior to reaching bicycle and pedestrian crossings. Furthermore, the buffer distance between automobile traffic and sidewalks and shared-use paths will be increased, improving bicyclist and pedestrian safety and comfort. Finally, lighting will be	Traffic (3.8) Refined Alternative I (Concept I-W) and Purpose and Need (3.9)



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				installed in underpass areas to improve safety and security for pedestrians and bicyclists.	
		B-69-2	02/20/2024 - Because there is no way to say you are concerned about safety when in my hands are statistics about current air pollution being produced by the traffic in the corridor today. That air pollution is between 150,000 to 160,000 per vehicle and are only expected to increase.	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	Air Quality (4.6)
				KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <u>Quantitative MSAT Analysis Report</u> (August 2023). The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. The analyses concluded that emissions of the analyzed pollutants would be substantially reduced for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards	



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				coupled with fleet turnover. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant. Given the above, Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-69-3	02/20/2024 - as well as the harm that will happen not only to our community members, but to our houseless population being displaced even more.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several enhancements to further benefit surrounding communities. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic	Purpose and Need (2.) Neighborhood and Community Cohesion (4.1.2) Environmental Justice (4.1.7)



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				enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	
				Unhoused individuals are sometimes present in public spaces in and near the project area, including areas under bridges in the transportation right-of-way. Unhoused individuals who may be present in the project area are transient in nature, and the number of individuals varies at any given time. There are several organizations within the region that provide support to unhoused persons. Within ½-mile of the project area, the David and Rebecca Barron Center for Men provides beds, meals, and support services for men who are unhoused. A Winter Shelter providing shelter to unhoused single men and women operates at the same location between December and February. Neither these facilities nor the support services they provide for unhoused individuals will be impacted by Refined Alternative I (Concept I-W). If unhoused individuals are impacted by construction, KYTC and ODOT will coordinate with local agencies to notify such individuals through existing state and local processes.	
		B-69-4	02/20/2024 - I ask that there be a second 3 rd party evaluation done to inspect the impacts done by this bridge. Thank you.	Consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.109 and 771.119, FHWA, KYTC and ODOT are responsible for managing the environmental review process and the preparation of the appropriate review documents, and FHWA is responsible for issuing the final decision for an action. The supplemental Environmental Assessment (EA) has been prepared consistent with 23 CFR §§ 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project	Introduction (1.)



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				activities that were not expressly included in the approved 2012 EA/ FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	
		B-69-5	02/20/2024 - Thank you guys again for being here. I did have one question for you. In the environmental justice portion of this. In the survey done with the community, who exactly did you interview for these surveys? Because this 95% of people who are white that have answered the demographics, are they actual homeowners or are they landlords to people in these areas? Because if that is the case, then you are not listening to residential people at all. You are completely ignoring the residential people in the downtown Cincinnati area as well as the West End. Please, please, I beg of you to go in and talk to these people. I doubt these people would be okay with you completely destroying their homes just so you can have more infrastructure and getting semi-trucks through the downtown Cincinnati area. Thank you.	 Refined Alternative I (Concept I-W) will remove four residences. Two of these residences are tenant occupied, and none is located in downtown Cincinnati or the West End neighborhood. Opportunities for environmental justice (EJ) communities to offer feedback about the project occurred during targeted EJ/neighborhood outreach meetings in late 2022 and open-house project update meetings in August 2023. Advertisements about public involvement activities were distributed to both property owners and tenants. Between November 15, 2022 and December 20, 2022, KYTC and ODOT hosted 16 targeted neighborhood outreach meetings (12 small-scale meetings in individual neighborhoods and 4 broad-scale meetings). A total of 418 people signed in at the meetings, excluding the project team. Comments were accepted on a website dedicated to the targeted neighborhood outreach between November 15, 2022 and January 5, 2023. The website was viewed 2,559 times, with 218 individuals choosing to engage by submitting comments or responding to polling questions. While demographic questionnaires were available at all in-person neighborhood meetings, and polling questions on the PublicInput website sought demographic data of participants, providing demographic data. All meetings were attended by residents of the targeted neighborhoods. Community members generally supported the refinements, mitigation, and enhancements incorporated into Refined Alternative I (Concept I-W), 	Relocations (4.1.5) Environmental Justice (4.1.7) Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)



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				including the reduction of the project footprint, the incorporation of additional noise/visual screening barriers, measures to reduce flooding and combined sewer overflows, new and improved multimodal facilities, additional developable land, and aesthetic features. During the EJ outreach comment period, community members offered additional feedback and suggestions. Every comment was evaluated by the project team, and individual responses were prepared and published on the project website. Furthermore, the project team incorporated several refinements into Refined Alternative I (Concept I-W) in direct response to the comments received. Unanticipated additional impacts on EJ populations were not identified during the EJ outreach.	
				Minority and low-income individuals were provided the opportunity to review the supplemental EA, attend in- person and virtual public hearings, and provide comments to KYTC and ODOT during the 30-day public availability period. To make sure that all populations were aware of these opportunities, postcards advertising the availability of the supplemental EA and the public hearings were delivered to nearly 50,000 mailboxes in the EJ study area.	
				Public involvement will continue to occur during the design and construction of the project. Furthermore, KYTC and ODOT will continue coordinating with the Project Advisory Committee and local agencies and stakeholders, who will continue to act as liaisons to the communities immediately affected by the project.	
B-70	Curtiss, Elizabeth	B-70-1	02/20/2024 - I live along the I-71 corridor in Cincinnati and I'm pretty appalled at the lack of mass transit and other options that are convenient to get people downtown and across the river. So, my question is, in terms of the number of lanes on the new bridge, how much of that is considered to be brought from 71 as opposed to 75, and can there be more?	The new companion bridge included in Refined Alternative I (Concept I-W) will have five lanes on each deck. Each deck will consist of three lanes for I-75 traffic and two lanes for I-71 traffic.	Project Description (1.1)



ID	Name	No.	Comment	Response	Reference ¹
		B-70-2	02/20/2024 - I don't think you could do much to mitigate the traffic on 75. It's a major north south for many more states than our own. But 71, I think, really is a prime target for congestion pricing, rail alternative, even just more buses or any of those things to get traffic off of 71. And that could perhaps help a little bit with the size of the new bridge and certainly the amount of pavement in the downtown. A few weeks ago, I went to a meeting up in over the Rhine about streetcar expansion options. And people were saying, well, what about Kentucky? What about Kentucky? And the response was, well, Kentucky doesn't want to be involved in streetcars. And that may or may not be true, but I certainly would want to know more about that because a lot of the traffic across the bridge over the course of my life has been these very short little jaunts that you come over to someplace that's really close by and I don't know why. Some kind of local option like a streetcar connection, although I'm not saying it has to be a streetcar connection, but I don't know why that kind of individual automobile alternative is not more fully explored. It took me forever to get a TANK bus coming through, and it was rush hour.	The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. The Brent Spence Bridge (BSB) Corridor Project does not include congestion pricing because it is a form of tolling and is therefore prohibited in Kentucky. In 2004, the Ohio-Indiana-Kentucky Regional Council of Governments and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <i>North South Transportation Initiative</i> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, neither expanded transit routes nor passenger rail would meet the project purpose and need, and they are not considered to be reasonable alternatives for the BSB Corridor Project. The BSB Corridor Project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude	Funding (1.2.1) Purpose and Need (2.) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
B-71	Weyand- Geise, Nate	B-71-1	02/20/2024 - I'm a resident at [REDACTED] John Street, which is in West Covington, a neighborhood really close to the Brent Spence project. I'm an urban planner, and I've come to research a lot of the history of highway design, and I'm very concerned about the impacts that will come from this project. Knowing the historical impacts of highway designs, the impacts that we have come to understand are white flight, urban disinvestment, pollution from the last round of highway expansions. As we double down on this infrastructure, are we going to come to expect the same things to happen? We'll be replicating the same infrastructure, which is going to cause the problem. Highways cause the problem that we're now dealing with, and we're trying to solve it with another highway.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. KYTC and ODOT have worked to avoid and minimize impacts during the development of the Brent Spence Bridge Corridor Project. Refined Alternative I (Concept I-W) incorporates several refinements that reduce the project's overall footprint, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge. In addition, KYTC and ODOT have worked to incorporate several enhancements to further benefit surrounding communities. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	Purpose and Need (2.) Additional Refinements (3.3) Neighborhood and Community Cohesion (4.1.2)
		B-71-2	02/20/2024 - Highways across the country have shown how we divide places as much as these projects connect the suburbs, they've divided neighborhoods like my own from the most walkable part of Covington, which is Mainstrasse. I love having a friend down there, walking down,	Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. These improvements will increase the options available to pedestrians and bicyclists, which will enhance community connectivity along and across the I-71/I-75	Travel Patterns and Access (4.1.4)



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		grabbing a slice of pizza, being in traffic inside Goodfellas, talking to neighbors, seeing people come up. I want to be in that type of traffic: people traffic, not car traffic. Use this money to build infrastructure that reconnects our neighborhoods. Living just on the other side of the highway, I see the threshold every day as I cross it. I love that there's a Lexus dealership. Would love to buy a Lexus one day, but I don't think that's benefiting me and many of the people who live in West Covington. Mainstrasse is a walkable place. Let's replicate that awesome place across the rest of our region, not by doubling down on the infrastructure that moves people out of them, but building more that brings them back to our cities.	corridor and may improve access to transit, employment, healthcare, cultural, recreational, and commercial destinations. At Pike Street and West 12 th Street/MLK Jr. Boulevard, the project will improve connections to the Lewisburg neighborhood, which was left isolated from greater Covington by the original interstate construction. In Ohio, the bicycle and pedestrian infrastructure will improve connectivity in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will support future planned improvements of regional pedestrian and bicycle networks.	
Nicaise, Nolan	B-72-1	02/20/2024 - I'm an urban planner and environmental scientist and resident in Covington. I disagree that the taking of the land in Goebel Park is in fact de minimis. Covington will lose valuable parkland and yield a net loss of public space. Additionally, the loss of a public pool is detrimental to the community and childhood development. The state compensation of \$1.3 million is inadequate to replace a public pool. Anyone would know that. This is why, as an elected commissioner of the city of Covington, I was not in favor of accepting this plan as de minimis.	Refined Alternative I (Concept I-W) will acquire 2.84 acres of permanent right-of-way, including 360 feet of walking trails, two basketball courts, and associated resources from the Goebel Park Complex. Interstate widening will also place the highway lanes closer to the park, which will result in proximity impacts to an outdoor pool. Impacts will be mitigated through the provision of replacement land; reconstruction of the walking trail within the complex; and a financial commitment from KYTC for the development of a new Goebel Park Complex Master Plan (\$100,000), replacement and enhancement of the basketball courts or other outdoor recreation facilities within the park (\$94,500), and a relocated outdoor pool and associated facilities or other comparable aquatic facility serving the same purpose within the park (\$1,337,000). Noise/visual screening barriers are also proposed to provide enhanced sound reduction in the complex. In addition, the separation of interstate runoff from the combined sewer system will reduce flooding and combined sewer overflows in the complex. The funding provided for the Master Plan, relocation of	Goebel Park Complex (4.13.3)
			Goodfellas, talking to neighbors, seeing people come up. I want to be in that type of traffic: people traffic, not car traffic. Use this money to build infrastructure that reconnects our neighborhoods. Living just on the other side of the highway, I see the threshold every day as I cross it. I love that there's a Lexus dealership. Would love to buy a Lexus one day, but I don't think that's benefiting me and many of the people who live in West Covington. Mainstrasse is a walkable place. Let's replicate that awesome place across the rest of our region, not by doubling down on the infrastructure that moves people out of them, but building more that brings them back to our cities.Nicaise, NolanB-72-102/20/2024 - I'm an urban planner and environmental scientist and resident in Covington. I disagree that the taking of the land in Goebel Park is in fact de minimis. Covington will lose valuable parkland and yield a net loss of public space. Additionally, the loss of a public pool is detrimental to the community and childhood development. The state compensation of \$1.3 million is inadequate to replace a public pool. Anyone would know that. This is why, as an elected commissioner of the city of Covington, I was not in favor of	Nicaise, NolanB-72-102/20/2024 - I'm an urban planner and envinces and visits and resident in to is in fact the taking of taking the taking taking the taking of the taking of the taking of the taking of taking the taking taking taking the taking of taking t



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				based on cost estimates to complete the work and were developed in conjunction with the City of Covington.	
				The proposed mitigation measures for the Goebel Park Complex are compensatory to the impact to the property. The replacement property will be compatible with and will not diminish the outdoor recreation areas in the complex. The replacement property is higher in elevation than the portions of the complex that will be acquired by the project and not prone to flooding. In addition, the replacement land is flatter and closer to other prominent park features. Based on these characteristics, the replacement land has greater potential for future enhancements to outdoor recreational activities and amenities within the Goebel Park Complex, which will be established in the new Master Plan that will be funded by the proposed mitigation measures for the complex.	
				The operation of the basketball courts will be maintained throughout construction, outdoor recreation will remain the primary function of the site, and it will remain free and open to the public. The project will not necessitate the closure of the pool, although decisions about pool operations are made by the City of Covington.	
				There is no prudent alternative that avoids the use of the Goebel Park Complex, and Refined Alternative I (Concept I-W) includes all possible planning to minimize harm to the property. The resulting impacts, with the identified mitigation measures, will not adversely affect the activities, features, and attributes that qualify the Goebel Park Complex for protection under Section 4(f).	
				FHWA intends to make a determination of de minimis impacts to the Goebel Park Complex. In accordance with Title 23 of the Code of Federal Regulations (CFR) section 774.5(b)(2), the public is being provided 30 days to comment on the impacts to the complex, and any comments received will be forwarded to the City of Covington for its review and consideration. Following the opportunity for public review and comment, FHWA will obtain written concurrence from the City of Covington that	



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				the project will not adversely affect the activities, features, or attributes that qualify the Goebel Park Complex for protection under Section 4(f). FHWA will make the final de minimis impact determination based on the outcome of the public comment process and written concurrence from the City of Covington.	
		B-72-2	02/20/2024 - Furthermore, I ask the state to reject the supplemental environmental assessment and require a full EIS. As this draft does not consider a no-build alternative that includes congestion pricing. I urge you to reassess the alternatives to include this more environmentally friendly and just alternative to lane expansion.	The analysis documented in the supplemental Environmental Assessment (EA) has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final National Environmental Policy Act determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA. The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. The Brent Spence Bridge (BSB) Corridor Project does not include congestion pricing because it is a form of tolling and is therefore prohibited in Kentucky.	Funding (1.2.1)
		B-72-3	02/20/2024 - Thirdly, concerning the bats and stormwater and noise. I'm an environmental scientist. I noticed that loads of trees and shrubs were removed on the west side of 75 between fifth and twelfth in the last several months in Covington. Why remove them years before they're needed to be removed? Trees and shrubs support wildlife, mitigate stormwater pollution and abate sound. Keep them until the last moment necessary.	Trees and shrubs on the west side of I-75 between West 5 th Street and West 9 th Street in Covington were removed as part of a pilot transparent noise wall project being constructed by KYTC. The pilot transparent noise wall project is being completed independent of the BSB Corridor Project.	N/A



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		B-72-4	02/20/2024 - Fourthly, why are the bike and walk paths on the overpasses in Cincinnati only rendered as being on one side of the street? I recognize that these are one-way streets, but they should be on both sides. You want me to have to bike way out of the way to cross a bunch of lanes to get to one side of the street that has a sidewalk? You are building a pedestrian and bicycle wall. This is not safe and is not a best practice for environmental sustainability and public health/fitness. Thank you.	The one-way 6 th Street, 7 th Street, and 9 th Street overpass bridges will have two-way shared-use paths on each bridge. The presence of free-flow highway ramps on the other sides of these bridges would present safety concerns for pedestrians and bicyclists. Striped crossings will be provided in intersection areas. A sidewalk will only be included on the south side of Freeman Avenue with a new pedestrian bridge to provide safe crossing over Winchell Avenue. The reconstructed Ezzard Charles Drive bridge will include a sidewalk on the south side, and a shared-use path on the north side. The proposed shared- use paths and sidewalks on Cincinnati overpass bridges will connect to existing pedestrian and bicycle infrastructure and are expected to improve pedestrian and bicycle connectivity in the project area.	Travel Patterns and Access (4.1.4)
B-73	Garcia, Julie	B-73-1	02/20/2024 - I'm from northern Kentucky originally, and now I live in Cincinnati and I'm just a local citizen. I'm also a huge Cincinnati Northern Kentucky booster. I think we live in an awesome area and I just want to see it get nicer. And I've recently been learning a lot about the history of I-75 and I-71 and what they were built. And I've looked at pictures of what Cincinnati looked like in 1940, and I'd encourage everyone else to do this if you haven't. What it looked like in 1940 compared to what it looks like today. And it was awesome. You look at it and it looks kind of like New York City. It is dense. It is walkable. It's got beautiful old homes and duplexes and triplexes, and it was just this beautiful city. And in the 60s when we built these expressways, we demolished not only the areas that the expressway came through, that was not the only place that we destroyed those houses right in the path. We also ended up making all the areas around the expressway a desert where nobody wants to be. And if you	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared- use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor. Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge (BSB) Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2)

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			look at the aerial surveillance now, you will see it as parking lots, and it is warehouses, and it's not a place where people want to live and enjoy. And we've made, in focusing so much on letting people get down to Cincinnati and away from Cincinnati quickly or pass straight through it as a truck, we ended up making Cincinnati a place that's not very nice to live in, a lot of those places near the expressway, and I worry when I look at this project that we're making a lot of those same mistakes. So, I would just encourage you. I get it. This bridge is getting built, and I get it. But I would just encourage you to do whatever you can to reduce the footprint and the impact on the people of Cincinnati so that we don't make some of those same mistakes and we make this affect Cincinnati as least as possible. Thank you.	the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
		B-73-2	 02/20/2024 - I just want to really quickly respond to that because I used to have similar feelings because I'm an environmentalist, but we don't have too many people in America. America is not full. If you compare it to Europe, we're a country filled with wide open space. We have plenty of room to invite more people. We want people to come to Cincinnati. It helps our economy. We want people to move here and buy our stuff and pay money into our economy. What we do have too many of is cars. They're not an efficient way to get around. So, the reason we have traffic is we have too many cars. Los Angeles shows us that at some point, you just can't keep building more lanes. The traffic just keeps filling them. And now you have 16 lanes full of horrible traffic and you destroy even more land. So, it's not a problem with people. I used to think this, 	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the Ohio- Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum (December 2023)</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors,	Traffic (3.8)

BRENT SPENCE

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			but really a great book you can read is called 1 billion Americans by Matthew Yglesias. I highly recommend it to everyone. And the point here is just that at some point, I don't know if you guys are the right people to talk to generally about this, but I do just get a little depressed when I see a lot of projects about just expanding roads everywhere. And I grew up in Burlington, Kentucky, and I don't know if anybody's been out there recently. Kentucky, 18 used to be one lane each way, and now it's like an expressway through a small town. And it's so depressing. When I go out there, I'm like, this is horrible. It's just like, such an unpleasant place to be. And so, just as a general proposition, I would just submit to you that at some point, we can't just keep expanding the roads. It's so horrible. It's so ugly, it induces more traffic.	including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-73-3	02/20/2024 - I know we're American and we're not Europeans. I totally get it. But at some point, we do have to think about trains and making this a place where people want to bike, where people want to walk, because not only is it more pleasant, it's just, like, more efficient. And we're going to have less traffic if you make it easier for people to get around in ways other than cars.	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project. The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are	Purpose and Need (2.) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				ready to support this when it is advanced at a regional level.	
				Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	
B-74	Duncan, Heather	B-74-1	02/20/2024 - I'm a local resident. We say we want to improve the flow of traffic, but studies have shown that building more lanes often results in the increased demand, ultimately leading to the same or even worse congestion levels.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8)
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I	



ID	Name	No.	Comment	Response	Reference ¹
				(Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-74-2	02/20/2024 - That's one reason why I feel strongly that instead of focusing on expanding the highway, we need to focus on other solutions that address congestion more effectively, such as investing in public transit in order to make that a more appealing and viable alternative.	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanding transit routes would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project. The BSB Corridor Project addresses the highway component of the Initiative. The transit component included in the Initiative must be developed and championed regionally, and ODOT and KYTC are ready to support this when it is advanced at a regional level. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the	Purpose and Need (2.) Travel Patterns and Access (4.1.4)
				preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	



ID	Name	No.	Comment	Response	Reference ¹
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-74-3	02/20/2024 - At a time when other cities are focusing on deprioritizing highways to build more cohesive communities, this expansion will further disconnect our neighborhoods and put into place the change that we would not be able to undo in our lifetimes. While adding green space on the side of or in between busy streets is better than nothing, it does not make a city feel walkable or inviting for either residents or for visitors, whom we would love to attract more of. Cincinnati is for people, not for cars. Our city is for its residents and visitors, not for drivers and long haul truckers who are just zipping through. We need to focus on options that prioritize pedestrians and community cohesion. Thank you.	Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several enhancements to further benefit surrounding communities. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	Purpose and Need (2.) Neighborhood and Community Cohesion (4.1.2) Travel Patterns and Access (4.1.4)
B-75	Schmidt, John	B-75-1	02/20/2023 - I'm 73, and I was there when we had the initial session in Park Hills and came to the conclusion that we have to accommodate the vehicles. I have more to say than I can	The comment was considered unclear, and no response, other than to document the comment as received, can be provided.	N/A



ID	Name	No.	Comment	Response	Reference ¹
			possibly say. I'm very sorry, but that's what happens when you get 73.		
			I grew up in Erlanger next to the ball field for ten years. And then we moved to Fort Mitchell for the rest of my young years. And then I went to college in Williamstown, Massachusetts, and then back to Cincinnati in three years of medical school and then four years of electrical and computer engineering. And so I was the guy that brought Bill Gates to the podium and at UC, and I introduced Bill Gates. That is now, you know what he is. The point is that this world as a whole is overpopulated by people. By people. We have to stop producing new people. That's all we can do.		
		B-75-2	02/20/2023 - But we have to accommodate the flow of traffic through this town so that we don't have a bunch of trains going by. I mean, we can't avoid that. We are in the middle. This is in the middle of this point. Begins in Florida and extends itself into Canada. That's one strip, and it's the most dense strip in the United States.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors.	Purpose and Need (2.)
B-76	Robinson, Jody	B-76-1	02/20/2024 - I am opposed to this project. The SEA fails to adequately address the greenhouse gas emissions and climate change. It fails to even mention the greenhouse gas emissions from the construction, those resulting from producing and transporting the concrete, steel, asphalt and other materials to the site, fueling the heavy equipment used to demolish existing infrastructure and to construct the billions of dollars of new infrastructure, operating lighting for night construction and the like.	The evaluation of greenhouse gases and climate change prepared for the supplemental Environmental Assessment (EA) followed the guidance issued by the Council on Environmental Quality using methodologies discussed and in consultation with the U.S. Environmental Protection Agency (USEPA). The analysis was conducted at a quantitatively high level using USEPA's MOtor Vehicle Emission Simulator (MOVES). MOVES is USEPA's official model for state implementation plans and transportation conformity analyses and is listed by the U.S. Department of Transportation as the most common approach for modeling greenhouse gas emissions for transportation projects.	Greenhouse Gases and Climate Change (4.7) Construction Impacts (4.11)



ID	Name	No.	Comment	Response	Reference ¹
			Those emissions will be front loaded, occurring during the first four to six years, and those emissions will remain in the atmosphere for as long as a century and will continue to cause additional warming year after year, adding to the resulting climate change impact.	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted using travel demand models for the project's approved certified traffic. Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				In addition, roadway construction can contribute to the total greenhouse gas footprint of on-road transportation, including emissions from extraction, transportation, and production of roadway construction materials, and emissions from fuel used onsite from construction equipment and vehicles. Construction emissions can also include greenhouse gas emissions from roadway resurfacing and reconstruction, routine maintenance, and traffic delay resulting from construction activity.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality	



ID	Name	No.	Comment	Response	Reference ¹
				effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
				Avoidance, minimization, and mitigation measures incorporated into the project's environmental commitments will help to address greenhouse gas emissions during construction. These measures include developing detailed traffic management, maintenance of traffic, and incident management plans to minimize traffic congestion; requiring ultra-low sulfur diesel fuel for all diesel-powered construction equipment; prohibiting the burning of any materials on the construction site; minimizing idling time for diesel-powered equipment to the greatest extent practicable; and using solar power for digital signs to the greatest extent possible.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
		B-76-2	02/20/2024 - With respect to greenhouse gas emissions from use of the expanded highway corridor, the SEA's failure to adequately account for the induced travel that will result from the expanded highways renders its estimates unreliably lower. The reductions over time in the agency's projected emissions result	Traffic projections for the Brent Spence Bridge (BSB) Corridor Project were updated during the preparation of the supplemental EA. The comment appears to potentially reference traffic projections from prior studies. The evaluation of greenhouse gas emissions and climate change prepared for the supplemental EA followed the	Traffic (3.8) Greenhouse Gases and Climate Change (4.7)



ID	Name	No.	Comment	Response	Reference ¹
			from factors entirely independent of this project, federal fuel efficiency and exhaust emissions standards, and gradual replacement of current vehicles by newer vehicles and lower emissions. However, they project dramatically higher volumes of traffic in the future in this corridor than currently exist, an increase in traffic volumes is by as much as 50% by 2035 from volumes in 2017 to 2021, and admit that, the preferred alternative will result in 1.7% more traffic than the no-build. Traffic projections used to justify the need for a new ten lane bridge are unreliable and absurd.	guidance issued by the Council on Environmental Quality using methodologies discussed and in consultation with USEPA. The analysis was conducted at a quantitatively high level using USEPA's MOVES and travel demand models for the project's approved certified traffic. Consistent with USEPA's analysis methodology, greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to a 1.7 percent increase in total vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). The analysis concluded that greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the Ohio- Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum (December 2023)</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected	



ID	Name	No.	Comment	Response	Reference ¹
				between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-76-3	02/20/2024 - Moreover, the impacts of climate change are not limited only to those living in the immediate vicinity of the emission resources. The climate change has been recognized by both state and federal governments as disproportionately impacting low-income and minority communities.	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in a three-county area (Campbell, Kenton, and Hamilton counties) that extends beyond the communities in the immediate vicinity of the project. The analysis concluded that greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	Environmental Justice (4.1.7) Greenhouse Gases and Climate Change (4.7)
				Based on the greenhouse gas emissions analysis completed for the project, Refined Alternative I (Concept I-W) is expected to have minimal effects on climate change in the study area and the region.	
B-77	Spencer, Jessica	B-77-1	02/20/2024 - The urban planners, residents, professors, and environmental scientists who made public comments tonight has very legitimate concerns and examples of similar projects that brought increased vehicle traffic and air pollution.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified	Traffic (3.8) Air Quality (4.6)

ID	Name	No.	Comment	Response	Reference ¹
				traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model.	
				Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
				Air quality studies prepared for Refined Alternative I (Concept I-W) utilized 2020 existing, 2050 no-build, and 2050 build traffic forecasts that were developed using the same OKI travel demand model of record that was used to develop the certified traffic projections that were used for the traffic operational analyses for the project. The air quality studies concluded that Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	
		B-77-2	02/20/2024 - Better alternatives would be a combination of toll for use, routing traffic around 275, planning for mass transit and more mike/pedestrian lanes and preserving the	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric	Funding (1.2.1) Purpose and Need (2.)



ID	Name	No.	Comment	Response	Reference ¹
ID	Name	No.	Comment existing natural infrastructure to help buffer environmental and health impacts of the highway.	 deficiencies; and maintain connections to key regional and national transportation corridors. The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. The BSB Corridor Project does not include congestion pricing because it is a form of tolling and is therefore prohibited in Kentucky. In 2005, KYTC and ODOT conducted a <i>Feasibility and Constructability Study of the Replacement/Rehabilitation of the Brent Spence Bridge</i>. Among other considerations, the study evaluated the impacts and costs of prohibiting all through trucks on the existing BSB. The study concluded that the issue of diverting trucks from the existing BSB has regional implications in terms of increased traffic on a number of travel corridors, and such prohibitions would increase costs to the users. In 2007, and as part of a separate study, OKI, which is the Metropolitan Planning Organization (MPO) for the area, completed a <i>Brent Spence Bridge Truck Ban Analysis</i>. A ban on through trucks on the northern Kentucky portion of I-71/I-75 was found to have no substantial benefits. The volumes of diverted traffic were relatively small compared to the overall volume, and the impact on severe crashes within the system was minor. Furthermore, operating costs to the trucking industry would negatively impact the 	Reference ¹ Alternatives (3.) Travel Patterns and Access (4.1.4)
				to the overall volume, and the impact on severe crashes within the system was minor. Furthermore, operating	
				In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit routes	



ID	Name	No.	Comment	Response	Reference ¹
				would not meet the project purpose and need and are not considered to be a reasonable alternative for the BSB Corridor Project.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment (EA). Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access. Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday.	
				Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. These improvements will increase the options available to pedestrians and bicyclists and will enhance connections to existing bus stops.	
				KYTC and ODOT have worked to avoid and minimize impacts during the development of the BSB Corridor Project. Refined Alternative I (Concept I-W) incorporates mitigation measures to offset unavoidable impacts and enhancement measures to provide additional benefits to the surrounding communities.	
				Refined Alternative I (Concept I-W) incorporates several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land formerly occupied by the dunnhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge.	



ID	Name	No.	Comment	Response	Reference ¹
		B-77-3	02/20/2024 - Please do a better job of actually engaging BIPOC [Black, Indigenous, and people of color] communities in a meaningful way	The project has incorporated robust engagement of environmental justice (EJ) populations, which include minority and low-income individuals. Opportunities for EJ communities to offer feedback about the project occurred during 16 targeted EJ/neighborhood outreach meetings in late 2022 and open-house project update meetings in August 2023. All meetings were attended by residents of the targeted neighborhoods. Community members generally supported the refinements, mitigation, and enhancements incorporated into Refined Alternative I (Concept I-W), including the reduction of the project footprint, the incorporation of additional noise/visual screening barriers, measures to reduce flooding and combined sewer overflows, new and improved multimodal facilities, additional developable land, and aesthetic features. During the EJ outreach comment period, community members offered additional feedback and suggestions. Every comment was evaluated by the project team, and individual responses were prepared and published on the project website. Furthermore, the project team incorporated several refinements into Refined Alternative I (Concept I-W) in direct response to the comments received. Unanticipated additional impacts on EJ populations were not identified during the EJ outreach. Minority and low-income individuals were provided the opportunity to review the supplemental EA, attend in- person and virtual public hearings, and provide comments to KYTC and ODOT during the 30-day public availability period. To make sure that all populations were aware of these opportunities, postcards advertising the availability of the supplemental EA and the public hearings were delivered to nearly 50,000 mailboxes in the EJ study area. Public involvement will continue to occur during the design and construction of the project. Furthermore, KYTC and ODOT will continue to act as liaisons to the communities immediately affected by the project.	Environmental Justice (4.1.7) Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)



ID	Name	No.	Comment	Response	Reference ¹
		B-77-4	02/20/2024 - and do a full EIS. This project is currently uninspiring and will not solve much.	The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in Title 40 of the Code of Federal Regulations (CFR) section 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final National Environmental Policy Act determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	N/A
B-78	Shiff, Sophie	B-78-1	02/20/2024 - We have had the warmest year so far a record-we desperately need to cut our emissions & this bridge is one giant dollop of climate denialism. This is not the path forward to a just, equitable world. The timeline in which this bridge gets built is the one in which we all die of climate collapse in 30 years.	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic.	Greenhouse Gases and Climate Change (4.7)
				Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	



ID	Name	No.	Comment	Response	Reference ¹
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
		B-78-2	02/20/2024 - In which the area directly surrounding the bridge become unlivable & all the children who grown up there develop asthma & cancer. In walks around my neighborhood, with the bridge as is, we inhale unhealthy amounts of brake dust.	Refined Alternative I (Concept I-W) will not permanently impact operations or facilities that are utilized by children. Furthermore, the project is not expected to degrade, and may improve, air quality in areas utilized by children. Noise barriers and noise/visual screening barriers incorporated into the project's environmental commitments will reduce noise levels in areas utilized by children. Finally, an outdoor ambient air quality monitoring program and measures to reduce construction noise incorporated into the project's environmental commitments will provide greater protections against temporary air quality and noise impacts during construction in and near areas utilized by children. Therefore, Refined Alternative I (Concept I-W) is not expected to result in permanent impacts on children; temporary impacts that may be experienced by children during construction will be minimized to the greatest extent practicable.	Disadvantaged Communities (4.1.9) Children (4.1.10) Air Quality (4.6)
				KYTC and ODOT evaluated the effects of Refined Alternative I (Concept I-W) on health burdens in disadvantaged communities in a <u>Socioeconomic</u> <u>Technical Report</u> (January 2024). The analysis concluded that Refined Alternative I (Concept I-W) will not further contribute to health burdens; rather, Refined Alternative I (Concept I-W) may result in potential better health outcomes for those with asthma, diabetes, heart disease, or low life expectancy due to improved access to	



ID	Name	No.	Comment	Response	Reference ¹
				healthcare destinations, improved options for active transportation, and improved air quality due to improved traffic flow and reduced vehicle idling.	
				Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. Brake dust is a component of PM2.5. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	
				KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <u>Quantitative MSAT Analysis Report</u> (August 2023). The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. The analyses concluded that emissions of the analyzed pollutants would be substantially reduced for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the	



ID	Name	No.	Comment	Response	Reference ¹
				implementation of the latest federal emissions standards coupled with fleet turnover. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant. Given the above, Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-78-3	02/20/2024 - WE NO NOT NEED THIS BRIDGE. LEAVE OUR COMMUNITY ALONE. I was infuriated when I first saw this plan! I live just a smidge over 1000ft from the freeway already & I'm sure I will feel the negative health impacts of that within my lifetime. The Brent Spence is a rarely, if ever backed up as is- traffic almost always flows freely. We don't need a new bridge & the distance that we need	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project	Purpose and Need (2.) Traffic (3.8) Environmental Justice (4.1.7)



ID	Name	No.	Comment	Response	Reference ¹
			one to support non-local traffic shows that you don't actually care about what the impacts may be to those who live near by – disproportionately minority communities – this is all about creating profits for the region over prioritizing the needs & wishes of who live here.	based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected population and employment growth are also incorporated into OKI's regional travel demand model. The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods.	
				An <u>Environmental Justice Analysis Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The environmental justice (EJ) analysis was conducted in accordance with the U.S. Department of Transportation Order 5610.2C and FHWA Order 6640.23A, which define disproportionately high and adverse effects. The EJ analysis also followed FHWA's <i>Guidance on</i> <i>Environmental Justice and the National Environmental</i> <i>Policy Act</i> (December 16, 2011).	
				The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on EJ populations:	



ID	Name	No.	Comment	Response	Reference ¹
				 No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; 	
				- No adverse indirect and cumulative effects;	
				 No disproportionately high and adverse relocation, noise, or temporary construction effects; and 	
				- Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood.	
B-79	Dudevoire, Alex	B-79-1	02/21/2024 - Please sign me up for the newsletter	This individual was added to the project mailing list and will receive future project updates.	Ongoing Public & Stakeholder Involvement (5.6)
B-80	James, Theodore L.	B-80-1	02/21/2024 - Can we get more detailed drawings? These don't provide enough information to make an effective decision.	The primary features of Refined Alternative I (Concept I-W), including locations of proposed roadways and bridges, retaining walls, noise barriers, noise/visual screening barriers, sidewalks, shared-use paths, bike lanes, wetlands, streams, historic properties and districts, community resources, existing and proposed right-of-way, proposed permanent and temporary easements, and impacted structures are shown in the "Refined Alternative I (Concept I-W) Exhibit" that is posted in the "Documents" sidebar on the website for the supplemental Environmental Assessment: www.PublicInput.com/bsbc. Several other exhibits and materials are also posted in that location to provide additional project details. The evaluation presented in the supplemental Environmental Assessment is based on the preliminary design information reflected in these materials. The design will continue to be developed as the project progresses through the detailed design phases.	Project Description (1.1)



ID	Name	No.	Comment	Response	Reference ¹
B-81	Freeman, John	B-81-1	02/21/2024 - I believe the importance of connecting Cincinnati to Queensgate using the Bridge Forward plan is being understated. Connecting the downtown now will most likely be the only opportunity that this city has to do so in any of our lives. We can fix it now and give our city the potential for significant growth, or just hope we do not regret it later.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. Features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices. Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing Brent Spence Bridge (BSB) for local traffic as part of the collector-distributor roadway system and a new double-decker companion bridge to the west for through (interstate) traffic. In addition, performance- based design principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the pro	Purpose and Need (2.) Alternatives (3.) Future Design Refinements (3.7) Travel Patterns and Access (4.1.4) Public Comments (5.1.1)



ID	Name	No.	Comment	Response	Reference ¹
				approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District.	
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary (January 2024)</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
B-82	Elliott, Kate	B-82-1	02/21/2024 - Greetings, I would like to voice my opposition to the Brent Spence Corridor Expansion. My husband and I have been Cincinnati residents for more than ten years, and work frequently brings both of us across the river. This project is important to us. We are raising two kids, and I am tired of passing the onus of sustainability to the next generation. The time is now to make sustainable choices.	The commenter's opposition to the Brent Spence Bridge (BSB) Corridor Project has been included in the project record.	N/A
		B-82-2	02/21/2024 - Destroying 90 acres of forest? How dare you,	Refined Alternative I (Concept I-W) will disturb or remove 90.00 acres of forested habitat. The definition for forested habitat includes a wide range of trees and shrubs, some as small as 3-inches in diameter, and it also includes	Terrestrial Habitat (4.2.3)



ID	Name	No.	Comment	Response	Reference ¹
				dead trees that are still standing. A large portion of the forested habitat impacted by Refined Alternative I (Concept I-W) is located within the existing right-of-way, is near to the existing interstate, and is near or within highly developed urban areas.	
				The removal of up to 90 acres of forested habitat will result in the loss of potential foraging or maternity areas for the Indiana bat, the northern long-eared bat, and the tricolored bat. The removal of up to 4.38 acres of riparian habitat will result in the loss of potential foraging areas for the gray bat. Measures incorporated into the project to minimize and mitigate impacts to threatened or endangered bat species will also minimize and mitigate impacts to terrestrial habitat. These include minimizing tree removal and mitigating habitat loss in Kentucky through a contribution to the Imperiled Bat Conservation Fund. The Imperiled Bat Conservation Fund will offset project-related impacts to terrestrial habitats by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts.	
		B-82-3	02/21/2024 - especially when studies repeatedly show that expanding interstates only increases congestion.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the Ohio- Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> (<i>December 2023</i>), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
				calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-82-4	02/21/2024 - Our funds would be better used to invest in better public transit and cycling infrastructure so that those who can avoid personal vehicle use are more inclined to do so, therefore reducing congestion in a sustainable way.	Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	Purpose and Need (2.) Travel Patterns and Access (4.1.4)
				In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <i>North South Transportation Initiative</i> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanding transit routes would not meet the project purpose and need and is not	



ID	Name	No.	Comment	Response	Reference ¹
				considered to be a reasonable alternative for the BSB Corridor Project. The BSB Corridor Project addresses the highway component of the Initiative. The transit component included in the Initiative must be developed and championed regionally, and ODOT and KYTC are ready to support this when it is advanced at a regional level. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access. Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus	
		B-82-5	02/21/2024 - Climate change is real and causing imminent harm due to catastrophic flooding, landslides like we see on Rte 50, and dangerous winds. It will only get worse if we continue to enable our reliance on fossil fuels. We must make hard choices that turn the tide toward survival.	stops. KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing	Greenhouse Gases and Climate Change (4.7)



ID	Name	No.	Comment	Response	Reference ¹
				scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
B-83	Nick that highway expansions never work. Induced demand swallows any temporary purple improvements and in the end we have the defined	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors.	Purpose and Need (2.) Traffic (3.8)		
			In fact, what does work is removing highways which in some cases in other cities has caused property values in adjacent areas to triple or quadruple. Spending billions of taxpayer dollars on a project that is, without question, going to fail at its goal of reducing congestion is a manifest waste. The only thing this project can be viewed as is a handout to big construction	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana	



ID	Name	No.	Comment	Response	Reference ¹
			companies; the oil and gas industry; and the auto industry.	Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model.	
				Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-83-2	02/21/2024 - And it is simultaneously giving the middle finger to anyone who wants to use transit, a bike, or to walk as their main form of transportation. Also, it's a middle finger to the many people in our region who are forced to buy a car they cannot afford and cannot afford to maintain because our region continues to chain us to our cars like \$30,000 shackles. ODOT is a misnomer; Transportation implies you do anything other than subsidize car ownership and its associated industries. ODOT should be renamed ODOC where the C stands	Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future	Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
			for cars and it should come with a subtitle "a subsidiary of the traffic industrial complex." Unless we start making major investments in transit and non-car infrastructure now (or really 10 years ago) we are doomed to be a car dependent city for the next 50 years. But, I'm not holding my breath for anyone to do the right (read: smart) thing.	 planned improvements of regional pedestrian and bicycle networks. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access. Refined Alternative I (Concept I-W) is congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops. 	
B-84	Adam	B-84-1	02/21/2024 - I'm just skeptical that it will fix traffic or improve safety, especially southbound. All the "thru traffic" which will include most of the semi trucks will be in the left lanes after crossing the bridge but then immediately hit the 5% grade of the cut-in-the- hill. Where do they go? Do they all try to cross 7 lanes of traffic to get to the right lanes because they can't get up the hill without slowing down massively? That's dangerous and will actually increase congestion not alleviate it. Then even when you get to the top of the hill all those lanes quickly funnel back down to the 4 we have today before Buttermilk exit so the congestion is really just being pushed a couple miles south and the "safety" being added with shoulders is being removed with more lane switching and more slow	Refined Alternative I (Concept I-W) provides five lanes for southbound interstate traffic across the new companion bridge and six lanes for southbound interstate traffic in the area known as the "cut-in-the-hill," and the design will not require trucks to execute extensive weaving maneuvers when approaching the cut-in-the-hill. Traffic operational analyses prepared for Refined Alternative I (Concept I-W) include consideration of roadway grades and the percent of trucks on various roadway sections. The traffic operational analyses, which are documented in an <u>Interchange Modification Study Addendum</u> (December 2023), concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations along the area known as the "cut-in-the-hill" for all projected trips in the project area through the year 2049. Refined Alternative I (Concept I-W) will improve safety on the roadways in the project area by including measures to	Purpose and Need (2.) Traffic (3.8) Refined Alternative I (Concept I-W) and Purpose and Need (3.9)



ID	Name	No.	Comment	Response	Reference ¹
			moving semi trucks in the fast lane causing dangerous speed variances. In 10 years when this is finished traffic is going to be as bad or worse as it is today because of this lane setup and the existing steep grade on the hill that isn't going anywhere.	reduce congestion-related crashes. In addition, the collector-distributor roadway system will improve safety by separating through and local traffic and keeping them separate for longer distances, thus reducing weaving movements that increase the risk of crashes. The removal of left-hand exits and other design deficiencies such as substandard shoulders are also expected to improve safety and reduce crashes by further reducing weaving movements and by providing a larger buffer for vehicles. The <u>Interchange Modification Study Addendum</u> documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's Interactive Highway Safety Design Model.	
B-85	Regner, Matthew	B-85-1	02/21/2024 - Half of downtown Cincinnati was bulldozed to accommodate the interstate 60 years ago and all we got was a years of bad traffic straight through downtown and giant canton of concrete between down and the west side of the city, make the through traffic go around. This plan does not benefit Cincinnati.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements to benefit local communities. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; building a wider bridge on Ezzard Charles Drive to accommodate potential future retail development or civic space by the City of Cincinnati; and incorporating aesthetic treatments throughout the corridor; and improving drainage throughout the corridor. Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. These improvements will increase the options	Purpose and Need (2.) Additional Refinements (3.3) Travel Patterns and Access (4.1.4) Cumulative Effects (4.10.2)
				I-71/I-75. These improvements will increase the options available to pedestrians and bicyclists, which will enhance community connectivity along and across the I-75 corridor and may improve access to transit, employment, healthcare, cultural, recreational, and commercial destinations. In Ohio, the bicycle and pedestrian	



ID	Name	No.	Comment	Response	Reference ¹
				infrastructure will improve connectivity in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will support future planned improvements of regional pedestrian and bicycle networks.	
				Refined Alternative I (Concept I-W) results in a minor contribution to cumulative business displacements; stormwater runoff; and loss of parkland, wetlands, streams, and threatened and endangered species habitat. Based on the evaluation of direct impacts contained in the supplemental Environmental Assessment, Refined Alternative I (Concept I-W) will improve community cohesion, improve traffic flow and safety for all modes of travel, provide additional economic opportunities, improve air quality, abate noise, improve aesthetics, and reduce flooding and storm sewer overflows, which will offset negative cumulative effects resulting from Refined Alternative I (Concept I-W). Therefore, when considered with other past, present, and reasonably foreseeable projects, Refined Alternative I (Concept I-W) is expected to result in a minor contribution to cumulative impacts.	
				In 2005, KYTC and ODOT conducted a <u>Feasibility and</u> <u>Constructability Study of the Replacement/Rehabilitation</u> <u>of the Brent Spence Bridge</u> . Among other considerations, the study evaluated the impacts and costs of prohibiting all through trucks on the existing Brent Spence Bridge (BSB). The study concluded that the issue of diverting trucks from the existing BSB has regional implications in terms of increased traffic on a number of travel corridors, and such prohibitions would increase costs to the users.	
				In 2007, and as part of a separate study, the Ohio- Kentucky-Indiana Regional Council of Governments (OKI), which is the Metropolitan Planning Organization (MPO) for the area, completed a <u>Brent Spence Bridge</u> <u>Truck Ban Analysis</u> . A ban on through trucks on the northern Kentucky portion of I-71/I-75 was found to have no substantial benefits. The volumes of diverted traffic	



ID	Name	No.	Comment	Response	Reference ¹
				were relatively small compared to the overall volume, and the impact on severe crashes within the system was minor. Furthermore, operating costs to the trucking industry would negatively impact the region. The deployment of a truck ban would also present difficulties in terms of enforcement. Therefore, diverting traffic would not be effective and is not considered to be a reasonable alternative for the BSB Corridor Project.	
B-86	Anonymous	B-86-1	02/21/2024 - Widening the bridge would waste billions of dollars to satisfy a fake rising demand when in reality, traffic has been stable or declining. Study after study and experience has shown that highway expansion never solves traffic; it usually instead induces more traffic and ends up with the same congestion as before while having wasting money. And no, this will not be the exception.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8)
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange Modification Study Addendum</u> concluded that Refined	



ID	Name	No.	Comment	Response	Reference ¹
				Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-86-2	02/21/2024 - The only solution to traffic is viable alternatives to driving (public transit, cycling, walking, etc.) and more funding should be devoted to those methods instead.	Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks. In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <i>North South Transportation Initiative</i> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanding transit routes would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project. The BSB Corridor Project addresses the highway component of the Initiative must be developed and championed regionally, and ODOT and KYTC are ready to support this when it is advanced at a regional level.	Purpose and Need (2.) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
B-87	Michael	B-87-1	02/21/2024 - It requires a united civic imagination to materialize a truly great vision for a city, and I strongly believe that vision is baked into the Bridge Forward Cincinnati proposal for the BSB Corridor. There are once- in-a-century opportunities to radically inject economic and cultural vigor into a city, and a good example is Boston's "Big Dig", which helped turn downtown Boston and the North End into thriving communities in the early 2000s. We need to have this same committed imagination with Cincinnati: the chance to actually grow downtown west into Queensgate,	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. Features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices.	Purpose and Need (2.) Alternatives (3.) Future Design Refinements (3.7) Public Comments (5.1.1)
				Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge (BSB) Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	



ID	Name	No.	Comment	Response	Reference ¹
				Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing BSB for local traffic as part of the collector-distributor roadway system and a new double- decker companion bridge to the west for through (interstate) traffic. In addition, performance-based design principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <u>Public Involvement Summary</u> (January 2024). During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
		B-87-2	02/21/2024 - reduce dependence on human- killing auto emissions, and pursue public transit like additional streetcar routes and light rail.	In 2004, the Ohio-Indiana-Kentucky Regional Council of Governments and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that	Purpose and Need (2.) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				transit improvements alone would not address capacity issues on I-71/I-75. Therefore, neither expanded transit routes nor passenger rail would meet the project purpose and need, and they are not considered to be reasonable alternatives for the BSB Corridor Project. The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
				In consideration of feedback provided by the City of Cincinnati Department of Transportation and Engineering, ODOT will design and construct the non-deck components for the new Ezzard Charles Drive bridge over I-75 to not preclude potential future streetcar route	



ID	Name	No.	Comment	Response	Reference ¹
				expansion. The design modification will not change the footprint or the environmental impacts of the project.	
		B-87-3	02/21/2024 - "More lanes" never works, as countless studies show.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the Ohio- Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8)
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	



ID	Name	No.	Comment	Response	Reference ¹
		B-87-4	02/21/2024 - Let's transition from a reactionary mindset of "fixing traffic problems" and agree to a solution that not only fixes problems, but launches Cincinnati into its 21 st century golden age. Bridge Forward is the way.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared- use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor. During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7)
B-88	S., Adam	B-88-1	02/21/2024 - The following four bullet points have been identified as the purposes of this project: • Improve traffic flow and level of service (LOS); • Improve safety; • Correct geometric deficiencies; and • Maintain connections to key regional and national transportation corridors I would encourage you to eliminate point 1, and reconsider the no-build alternative. Let's make the bridge safe, work on sound-dampening measures, and consider rerouting heavy truck traffic but let's take massive expansion off the table.	Traffic operational analyses completed for the project justify the purpose and need. Analysis of the no-build condition concluded that the existing I-71/I-75 corridor has reoccurring travel delays for northbound I-71/I-75 in the morning peak period (rush hour), with traffic backups from the Brent Spence Bridge (BSB) often reaching the I-275 Interchange. The evening peak period has reoccurring traffic delays for southbound I-71/I-75 upstream of the Brent Spence Bridge, with backups on I-75 in Ohio often reaching the Western Hills Viaduct interchange. The traffic analysis for the 2049 no-build condition indicates these traffic delays are compounded and impact the local arterials, with queues forming at the ramp terminal intersections. The traffic operational analyses for the project are documented in the <i>Interchange Modification Study Addendum (December 2023)</i> . A No-Build Alternative was evaluated for the BSB Corridor Project. It consists of minor, short-term safety and	Purpose and Need (2.) No-Build Alternative (3.1) Traffic (3.8)

ID	Name	No.	Comment	Response	Reference ¹
				maintenance improvements to the BSB and the BSB corridor to maintain continuing operations within the existing right-of-way. This includes the scheduled maintenance work that was completed in conjunction with the emergency bridge repair in 2020. The No-Build Alternative does not meet the project purpose and need because it would not improve traffic flow or safety, would not correct existing geometric deficiencies, and would result in serious impacts to the traveling public and the region's economy.	
				Refined Alternative I (Concept I-W) will improve safety on the roadways in the project area by including measures to reduce congestion-related crashes. In addition, the collector-distributor roadway system will improve safety by separating through and local traffic and keeping them separate for longer distances, thus reducing weaving movements that increase the risk of crashes. The removal of left-hand exits and other design deficiencies such as substandard shoulders are also expected to improve safety and reduce crashes by further reducing weaving movements and by providing a larger buffer for vehicles. The <u>Interchange Modification Study Addendum</u> documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's Interactive Highway Safety Design Model.	
				In 2005, KYTC and ODOT conducted a <u>Feasibility and</u> <u>Constructability Study of the Replacement/Rehabilitation</u> <u>of the Brent Spence Bridge</u> . Among other considerations, the study evaluated the impacts and costs of prohibiting all through trucks on the existing BSB. The study concluded that the issue of diverting trucks from the existing BSB has regional implications in terms of increased traffic on a number of travel corridors, and such prohibitions would increase costs to the users.	
				In 2007, and as part of a separate study, the Ohio- Kentucky-Indiana Regional Council of Governments (OKI), which is the Metropolitan Planning Organization (MPO) for the area, completed a <u>Brent Spence Bridge</u> <u>Truck Ban Analysis</u> . A ban on through trucks on the	



ID	Name	No.	Comment	Response	Reference ¹
				northern Kentucky portion of I-71/I-75 was found to have no substantial benefits. The volumes of diverted traffic were relatively small compared to the overall volume, and the impact on severe crashes within the system was minor. Furthermore, operating costs to the trucking industry would negatively impact the region. The deployment of a truck ban would also present difficulties in terms of enforcement. Therefore, diverting truck traffic would not be effective and is not considered to be a reasonable alternative for the BSB Corridor Project.	
B-89	Aukstuolis, Algis	B-89-1	02/21/2024 - I'm a resident of the City of Cincinnati. So, I just want to thank you guys so much for putting in all this work and taking. I really appreciate that there's going to be land giving back to Cincinnati. There are still underlying concerns about adding lanes and having more car traffic in Cincinnati.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8)
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model.	
				Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the	

ID	Name	No.	Comment	Response	Reference ¹
				highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-89-2	02/21/2024 - 02/21/2024 - It does affect air quality. It is a problem in the city of Cincinnati that people do get asthma when there is a lot of car traffic where people live. Now, you guys are solving a very difficult geometry problem, and I think your hands are tied behind your back. So, for an example, we have maybe 80 people here. Now imagine if this meeting was a drive through meeting. I don't think we could fit all these people in this room.	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone. KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <i>Quantitative MSAT Analysis Report</i> (August 2023). The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions. To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. The analyses concluded that emissions of the analyzed pollutants would be	Disadvantaged Communities (4.1.9) Air Quality (4.6)



ID	Name	No.	Comment	Response	Reference ¹
				substantially reduced for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant. Given the above, Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
				KYTC and ODOT evaluated the effects of Refined Alternative I (Concept I-W) on health burdens in disadvantaged communities in a <u>Socioeconomic</u> <u>Technical Report</u> (January 2024). The analysis concluded that Refined Alternative I (Concept I-W) will not further contribute to health burdens; rather, Refined Alternative I (Concept I-W) may result in potential better health	



ID	Name	No.	Comment	Response	Reference ¹
				outcomes for those with asthma, diabetes, heart disease, or low life expectancy due to improved access to healthcare destinations, improved options for active transportation, and improved air quality due to improved traffic flow and reduced vehicle idling.	
		B-89-3	02/21/2024 - And when we look at the future of transporting people and not just transporting cars, other parts of the world have etched away and tried to solve that problem by diversifying transportation options. I really appreciate you guys thinking quite the glimpse, but we need to also look in the future. I know it's very difficult to imagine that Cincinnati can be a transport-oriented city with good public transportation, but I think if we can consider the project, how will we leave the door open for the potential for more public transportation to be more effective with the space on the bridge, and then to consider the health and safety of the people who live and work right next to the transportation corridor.	Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access. Refined Alternative I (Concept I-W) is coupatible with local transit plans and will not result in permanent or detrimental effects on transit access. Refined Alternative I (Concept I-W) is coupatible with local transit plans and will not result in permanent or detrimental effects on transit access. Refined Alternative I (Concept I-W) is coupase that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	Traffic (3.8) Refined Alternative I (Concept I-W) and Purpose and Need (3.9) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				The Interchange Modification Study Addendum documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's Interactive Highway Safety Design Model. The analysis concluded that Refined Alternative I (Concept I-W) will reduce crashes on the existing BSB, the I-71/I-75 mainline in Kentucky, the I-75 mainline in Ohio, and locations of notable changes incorporated into Refined Alternative I (Concept I-W).	
				In support of the KYTC <i>Complete Streets, Roads, and</i> <i>Highways Policy</i> , the ODOT <i>Multimodal Design Guide</i> , and the OKI <i>Regional Complete Streets Policy</i> , Refined Alternative I (Concept I-W) will promote safety for bicyclists and pedestrians. The ramp connections with local streets are being designed as lower-speed urban roadways, which will encourage drivers to decelerate to safe speeds prior to reaching bicycle and pedestrian crossings. Furthermore, the buffer distance between automobile traffic and sidewalks and shared-use paths will be increased, improving bicyclist and pedestrian safety and comfort. Finally, lighting will be installed in underpass areas to improve safety and security for pedestrians and bicyclists.	
				An evaluation of the effects of Refined Alternative I (Concept I-W) on health burdens in disadvantaged communities concluded that Refined Alternative I (Concept I-W) will not further contribute to health burdens and may result in potential better health outcomes for those with asthma, diabetes, heart disease, or low life expectancy.	
B-90	Messer, William	B-90-1	02/21/2024 - I'm an interested citizen and a resident. I want to talk about the bridge itself. I'm an artist, and bridge design has been the most interesting architectural area of design for the last 30 years. There's been some amazing bridges. We've enjoyed an iconic bridge in the Roebling Bridge for almost 160 years here, and it really establishes the identity of the city. And I	KYTC, ODOT, and the project Aesthetics Committee are coordinating the design of the new companion bridge to ensure that it is an iconic, aesthetically pleasing structure. Refined Alternative I (Concept I-W) incorporates flexibility in the bridge types to allow the progressive design-build team to pursue innovative and cost-effective designs to the greatest extent possible. The bridge types for Refined	Visual Resources (4.9)



ID	Name	No.	Comment	Response	Reference ¹
			would like. I know it's already been decided that it's a two pier bridge, and there are two basic designs for that already limits what we can do. That could be really amazing and innovative, but I want to push for something that is amazing and innovative that becomes a bridge that everybody will recognize as the Cincinnati bridge all over the country, if not beyond.	Alternative I (Concept I-W) are broadly described as an "arch bridge" and a "cable-stayed bridge." KYTC and ODOT will determine the final bridge type for the new companion bridge based on a technical evaluation performed by the design-build team. Once the bridge type is determined, information regarding the decision will be made available to the public, and the project Aesthetics Committee will be engaged to provide feedback on the aesthetic elements of the new companion bridge and the existing Brent Spence Bridge (BSB). KYTC and ODOT will also continue to engage the project Aesthetics Committee for final confirmation of the aesthetic treatments included in Phase III of the project.	
		B-90-2	02/21/2024 - Also, in line with what the previous speaker said. I know that there's been talk about light rail to the airport for a long time, but as far as I know, from what I heard, that's a separate group of people that are working on that. And the bridge planning has not taken that into account as a possible conduit for the light rail. There's some possibility of hacking it on the side or something, but I wish that would be taken into consideration as well.	In 2004, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation</u> <u>Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project.	Purpose and Need (2.)
				The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	
		B-90-3	02/21/2024 - And there was something else. Oh, yes. When you come through the cut-in-	The commenter correctly states that the new companion bridge will be located west of the existing BSB. KYTC and	Visual Resources (4.9



ID	Name	No.	Comment	Response	Reference ¹
			the-hill, you get this wonderful shot of Cincinnati. When you come down the hill, it's just there in your face, looking fantastic. When you cross the bridge. Currently, you can look east and see the city, but it looks to me like the new bridge is going to be west of the old bridge, and you won't get to see the city. You won't get to see. I think you'll be looking through the old bridge, and that was a little upsetting to me. But these are aesthetic comments, and thank you very much.	ODOT evaluated the visual impacts of Refined Alternative I (Concept I-W) in terms of the visibility of the new bridge and its effects on the visual character of the surrounding communities. Refined Alternative I (Concept I-W) is expected to have minor visual impacts due to changes in interstate width and height, changes to the existing BSB, and construction of the new companion bridge (although roadway widths have been minimized by reducing the width of the companion bridge). The required elevations for the top of the new companion bridge are no less than 300 feet and no more than 420 feet above the normal pool elevation of the Ohio River. The minimum elevation was set to ensure visibility of the new bridge due to its proximity to the existing BSB, and the maximum elevation was set to protect the visual character of nearby historic districts. In addition, Refined Alternative I (Concept I-W) incorporates aesthetic enhancements that are anticipated to offset minor visual impacts and improve the overall visual character of the corridor.	
B-91	Schmidt, John	B-91-1	02/21/2024 - Anybody ever heard of the Cincinnati arch? We know that in the east and the west, the tides are rolling in, and we're having catastrophe in California and as well on the eastern side. We are so grateful to be here in Cincinnati. This is the Cincinnati arch, the most permanent rock within the United States of America. And we are on the corridor from Florida to Michigan. And we have, I think, a unique moment here in the construction that we do that will give us all and the world more options about Cincinnati. We can be sure that the earth will never quiver under the rock of Cincinnati. It's unique in all of the United States. It gets attached farther up to Canada. Of course, Canada is very solid, but we will have an inrush of people that are finding better living by coming in from the oceans.	The comment was considered unclear, and no response, other than to document the comment as received, can be provided.	N/A



ID	Name	No.	Comment	Response	Reference ¹
		B-91-2	 02/21/2024 - I'm following the discussion that I invited with regard to Cincinnati's unique location. And it's very stable, and it's a pleasant town, and it's a unique town because of the hills that we enjoy, and the river that flows through those hills. On both sides Kentucky, and Ohio, and not to mention Indiana as well. And so we have a unique threesome, you might say, of sisters in the middle. That is all sharing a very common rock of stability, which we don't see in today's understanding of what's going on in California, Florida, and the New York, even, area. But New York, Of course, is a very stable rock. But Cincinnati will be a relief valve or will accept its role. So, scratch that. I'm trying to get this right. People will come away from the oceans. That's the bottom line. The oceans are hot and getting worse. And Cincinnati is a very moderate climate in the middle of the United States. And, therefore, as 	The comment was considered unclear, and no response, other than to document the comment as received, can be provided.	N/A
			a community, we want to embrace people who do want to come. And allow some efficiency that this effort by the Ohio and the Kentucky what do we say? Bond? I'm kind of word We have a bond. We have a two state bond that is focused on allowing traffic to come through benign as benign as possible. Because in the future., It's going to get worse and worse if we don't do something.		
B-92	Wendel, Richard	B-92-1	02/21/2024 - I live in the city of Cincinnati. Just a concerned citizen. So, I believe that the environmental impacts of this project will be overwhelmingly negative. The project will result in more cars, more trucks, more pollution, and more lifeless asphalt. But I'm a realist. I know that this project is going to happen. We can sit	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act reevaluation and coordination efforts that have	Project Description (1.1) Traffic (3.8)



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			here and complain about it all day, but it's going to get built. There's political will behind it.	occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/ FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	
				The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). Refined Alternative I (Concept I-W) incorporates mitigation measures to offset unavoidable impacts and enhancement measures to provide additional benefits to the surrounding communities.	
				KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase	



ID	Name	No.	Comment	Response	Reference ¹
				is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-92-2	02/21/2024 - Even options like improved mass transit haven't been considered seriously, even though they can be built with existing infrastructure.	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanding transit routes would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project. The BSB Corridor Project addresses the highway component of the Initiative. The transit component included in the Initiative must be developed and championed regionally, and ODOT and KYTC are ready to support this when it is advanced at a regional level. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the	Purpose and Need (2.) Travel Patterns and Access (4.1.4)
				preparation of the supplemental EA. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access. Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that	



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				use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-92-3	 02/21/2024 - So, we're going to get this project, and this project is going to last, or the infrastructure built is going to last 75 years. So, we better get it right. And I think that the proposed mitigations on the Cincinnati side are not good enough. I want to get the most value out of this project for the city. And I have a couple of requests. Ideally, we would shrink the land used by the I-75/I-71, the spaghetti monster interchange next to Cincinnati. I shrink that as much as possible. I know the I-W concept has listed ten acres. I know we can do better engineering problem that can be solved. And I know you guys are really good at building highways. In addition, we should extend the street grid from between 5th Street and 9th Street, all those blocks across the interchange, to better connect into Queensgate since we have this opportunity, since we're already working with the interchange. And essentially this would set up a huge economic redevelopment opportunity, not just for the reclaimed land, but also for all of the land in Queensgate that you now have better access to. I ask ODOT to have some ambition, build this infrastructure that provides the best value for Cincinnati. Thank you. 	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reducec costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
B-93	Shupe, Sue Ellen	B-93-1	02/21/2024 - Resident of Cincinnati and East Price Hill, which is highly affected by the work that's going to be done just north of the bridge. I just have a couple of questions. Will the detailed design segment consider the additions that are being proposed for the street grid by the city of Cincinnati that would carry the traffic over the two viaducts that I use constantly, daily use to get here? This is between the Linn Street and Findlay Street. I have concerns about that, but if that's not going to be considered, I'll jump in on it later.	East Price Hill is located west of Queensgate in Ohio, and Refined Alternative I (Concept I-W) is not expected to impact this area. Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT, including ideas generated by the City of Cincinnati. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. When innovations are proposed, KYTC and ODOT will share recommendations with key stakeholders such as the City of Cincinnati, the City of Covington, the City of Park Hills, the City of Fort Wright, the City of Fort Mitchell, Hamilton County, and Kenton County and will gather feedback from local agencies that may be affected by any changes. Each local entity will be responsible for soliciting public feedback on innovations as part of their review and comment process. For example, the City of Cincinnati is assembling an advisory committee to provide project feedback that will include representatives from Hamilton County, the Cincinnati Port Authority, community councils, development corporations, business groups, and other interested groups. When KYTC, ODOT, and FHWA determine that an innovation will be incorporated into the project, the public	Project Description (1.1) Future Design Refinements (3.7)



ID	Name	No.	Comment	Response	Reference ¹
				explanation of the expected benefits, and the rationale for the decision.	
		B-93-2	02/21/2024 - And the other thing is you mentioned, which I hadn't heard before, that you're contributing to the Ezzard Charles Bridge viaduct corridor, whatever it is. And I'm not really sure I understand that because it's a dead end street. Dead ends right into the old terminal, the museum center. So, it gets in the way more of my time. But anyway, I would like to hear back on that through whatever you're going to do to address. Thank you.	During public involvement activities, ODOT received multiple comments suggesting the inclusion of retail areas on the Ezzard Charles Drive bridge over I-75. On August 29, 2023, the City of Cincinnati requested that ODOT investigate decking or an expanded bridge on Ezzard Charles Drive to support future civic space or retail development. Based on further coordination with the City of Cincinnati, ODOT has committed to building a wider bridge on Ezzard Charles Drive over I-75. The widened bridge will provide an additional 50 feet of green space on each side that could support potential future civic space or retail development by the City of Cincinnati. ODOT will fund the cost of the bridge design and will share the construction cost with the City. ODOT and the City will develop cost sharing and maintenance agreements prior to construction.	Public Comments (5.1.1)
B-94	Griffin, Christopher	B-94-1	02/21/2024 - I'm the West End Community Council President. So, I just typed up some things quickly. But historically, the West End has felt the brunt of these changing events. Rather, with urban renewal or with I-75 plowing through our neighborhood, this is the once in a lifetime event. To right or wrong, we're building this new companion bridge we get a chance to regain from our rich history we lost 75 years ago. This opportunity gives us hope of recovering land and reconnecting Queensgate to its long lost neighbor of the West End. Let's help build upon the city of Cincinnati plans to build better neighborhoods by making little impact on its residents while also making it safer for pedestrians.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several enhancements to further benefit surrounding communities. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit on community cohesion in the West End neighborhood due to the incorporation of aesthetic enhancements, proposed noise barriers, and drainage improvements. Refined Alternative I (Concept I-W) will also build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods in Ohio. New	Purpose and Need (2.) Neighborhood and Community Cohesion (4.1.2) Cumulative Effects (4.10.2)

ID	Name	No.	Comment	Response	Reference ¹
				bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	
				Refined Alternative I (Concept I-W) was evaluated for cumulative effects specific to the West End neighborhood. Cincinnati's West End, now partitioned into the Queensgate and West End neighborhoods, is an area that was historically impacted by urban renewal plans that were common in the United States in the mid-twentieth century. Refined Alternative I (Concept I-W) requires one commercial relocation (a small printing shop) in the West End neighborhood. In addition, the footprint of Refined Alternative I (Concept I-W) has been reduced and requires only minor amounts of strip right-of-way in the West End neighborhood. Refined Alternative I (Concept I-W) will not add to or exacerbate any adverse effects in the West End community from prior actions or events.	
				In recognition of the history of City-sponsored urban renewal and the original Mill Creek Expressway (I-75) construction and as an enhancement in the West End neighborhood, ODOT will work with the City of Cincinnati, which includes the West End Community Council, to develop content for an interpretive display describing the West End community in relation to historic City urban renewal and the Millcreek Expressway construction and to identify a location in proximity to the I-75 corridor to install the display.	
		B-94-2	02/21/2024 - Also, this opportunity gives us a chance to expand our street grid and open up Queensgate for future development. We want our community to be walkable with mixed use development and I think if we put our street grid up a little bit, it will give us a chance of development on both sides of I-75.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. Refined Alternative I (Concept I-W) includes several features for pedestrians in the West End neighborhood, including shared-use paths along the north side of	Future Design Refinements (3.7) Travel Patterns and Access (4.1.4)

ID	Name	No.	Comment	Response	Reference ¹
				Linn Street, Winchell Avenue and the north side of Ezzard Charles Drive; sidewalks along the south side of Linn Street, Court Street, Freeman Avenue, the south side of Ezzard Charles Drive, Liberty Street, Findlay Street, Bank Street, and Harrison Avenue; and a new pedestrian bridge over Winchell Avenue.	Public Comments (5.1.1)
				Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits.	
				Based on coordination with the City of Cincinnati, Refined Alternative I (Concept I-W) incorporates minor reconfigurations to the 3 rd Street, 4 th Street, 5 th Street, and 6 th Street ramps in downtown Cincinnati that will open up approximately 10 acres of land for potential redevelopment and/or public use. Based on further coordination with the City, ODOT has committed to building a wider bridge on Ezzard Charles Drive over I-75. The widened bridge will provide an additional 50 feet of green space on each side that could support potential future civic space or retail development by the City of Cincinnati. ODOT will fund the cost of the bridge design and will share the construction cost with the City. ODOT and the City will develop cost sharing and maintenance agreements prior to construction.	
				Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be	



ID	Name	No.	Comment	Response	Reference ¹
				considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
		B-94-3	02/21/2024 - Also in the West End, we would like everything to be capped. Like, if you can cap the whole thing so it won't even look like it's a highway, that'll be the best way. And improve our quality of life in the West End.	ODOT and KYTC have considered options for capping I-75 in Ohio, which is documented in the <i>Public</i> <i>Involvement Summary</i> (January 2024). Once the interstate passes over the Ohio River, it cannot descend directly into downtown Cincinnati. South of 5 th Street, I-75 must stay elevated to cross active CSX rail lines between Pete Rose Way and 3 rd Street. In addition, any design requires accommodating a complicated system of mainline and ramp movements to provide local access and continuity along I-71, I-75, and US-50. Depressing the roadway to support a freeway cap while meeting these geometric constraints would require steep roadway grades that would not meet design standards. Such steep grades would present traffic operational and safety concerns, particularly considering the high volumes of heavy truck traffic traveling through the corridor. Between 5 th Street and Ezzard Charles Drive, including portions of the West End neighborhood, there are several areas where I-75 is relatively level with the surrounding land uses. A freeway cap could be constructed either by leaving I-75 at the current elevation or by lowering the interstate. If the existing I-75 elevation is maintained, a freeway cap would need to be constructed 20 to 30 feet over the highway to provide adequate clearance for the freeway lanes. Given the proximity of Western Avenue and Winchell Avenue, the freeway cap would either need to extend over these roads, or Western and Winchell avenues would need to be raised up to be level with the top of the cap. Transitioning from the top of the highway cap back to the elevations of the surrounding land uses in	Public Comment Outcomes (5.1.2)



ID	Name	No.	Comment	Response	Reference ¹
				a way that provides accessible and open connections east and west of I-75 would substantially increase the project's footprint beyond what is considered reasonable and would impact low-income housing, schools, parks, historic structures, commercial and industrial businesses, and local streets. These impacts could be reduced through the extensive use of retaining walls along either I-75 or Western and Winchell avenues. However, the retaining walls would render the cap inaccessible from surrounding land uses and would only serve to create an even greater barrier through downtown Cincinnati and the West End neighborhood.	
				Building a freeway cap by lowering I-75 would avoid the need for retaining walls; however, the interstate would need to be lowered by 20 to 30 feet, which would require prohibitively steep grades to meet the geometric constraints of the CSX rail lines. Furthermore, capping the highway would likely require the removal of I-75 connections with 5 th Street, 6 th Street, 7 th Street, and 8 th Street and would not be able to accommodate US-50, which is an important regional connection.	
				I-75 is elevated above the surrounding land uses in the portions of the West End neighborhood that are north of Ezzard Charles Drive. Capping the highway in this area would further exacerbate the concerns with geometric feasibility, impacts to surrounding land uses, and local accessibility discussed for portions of I-75 to the south.	
B-95	Harris, Tyler	B-95-1	02/21/2024 - Just want to say I'm very excited for this project and the amount of jobs it's going to create for the local construction market, we could use it right now. I'm also excited to be able to work on a project that the whole country is kind of interested in. It's not often that Cincinnati gets a spotlight like this and I think that's very exciting. I just want to thank you for the amount of work you're putting in.	The commenter's support for the Brent Spence Bridge Corridor Project has been included in the project record. The construction of Refined Alternative I (Concept I-W) is expected to result in temporary increases in employment due to construction job creation. Temporary economic benefits are also anticipated due to increased sale of construction supplies, materials, equipment, and fuel from local and regional sources and increased revenue for businesses providing services to construction crews.	Construction Impacts (4.11)



ID	Name	No.	Comment	Response	Reference ¹
B-96	Weiderhold, Chas	B-96-1	 02/21/2024 - I'm a resident of Cincinnati and Northside. I work with GBBN architects who have been studying this project for the past couple years. And there are a few things that I'd love to add at this public forum. First off, it really feels like this project wasn't happening for a really long time and then all of a sudden it was. And I'm really glad that you opened it back up for this commentary from the community. A few things. In the mid-20th century, the construction of the Mill Creek expressway demolished a vast area, Cincinnati's 19th century urban fabric. Home to nearly 25,000 predominantly African American Cincinnati. This area has never rebounded or realized what has been described as urban renewal. So, I kind of disagree with some of the environmental impacts that no disproportionately or high adverse effects on minority or low-income populations in that we got to look at this and the kind of long term version of what this project has been. This is a redo of something and we need to right the wrongs. Like the president of the community council said. 	 An Environmental Justice Analysis Report (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The environmental justice (EJ) analysis was conducted in accordance with the U.S. Department of Transportation Order 5610.2C and FHWA Order 6640.23A, which define disproportionately high and adverse effects. The EJ analysis also followed FHWA's <i>Guidance on Environmental Justice and the National Environmental Policy Act</i> (December 16, 2011). The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on EJ populations: No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; No disproportionately high and adverse relocation, noise, or temporary construction effects; and Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sever overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood. Refined Alternative I (Concept I-W) was evaluated for cumulative effects specific to EJ populations. Refined Alternative I (Concept I-W) will result in a minor contribution to cumulative residential and commercial displacements and a cumulative loss of parkland and historic resources in these communities. These minor cumulative effects will be experienced by all populations and communities, including EJ populations and non-EJ populations. 	Environmental Justice (4.1.7) Cumulative Effects (4.10.2)



ID	Name	No.	Comment	Response	Reference ¹
				Cincinnati's West End, now partitioned into the Queensgate and West End neighborhoods, is an area with known EJ populations that was historically impacted by urban renewal plans that were common in the United States in the mid- twentieth century. Refined Alternative I (Concept I-W) requires one commercial relocation (a small printing shop) in the West End neighborhood. In addition, the footprint of Refined Alternative I (Concept I-W) has been reduced and requires only minor amounts of strip right-of-way in the West End neighborhood. Refined Alternative I (Concept I-W) will not add to or exacerbate any adverse effects in the West End community from prior actions or events.	
				In recognition of the history of City-sponsored urban renewal and the original Mill Creek Expressway (I-75) construction and as an enhancement in the West End neighborhood, ODOT will work with the City of Cincinnati, which includes the West End Community Council, to develop content for an interpretive display describing the West End community in relation to historic City urban renewal and the Millcreek Expressway construction and to identify a location in proximity to the I-75 corridor to install the display.	
				Refined Alternative I (Concept I-W) will improve community cohesion; improve traffic flow and safety for all modes of travel; improve air quality; abate noise; reduce flooding and combined sewer overflows; improve aesthetics; and provide additional economic opportunities, which will help to offset any cumulative effects from past, present, and reasonably foreseeable actions. Therefore, no adverse cumulative effects on EJ populations are expected to occur as a result of Refined Alternative I (Concept I-W).	
		B-96-2	02/21/2024 - What needs to happen with this project? There are several criteria to re-weave the city back into the Queensgate neighborhood and restitch together the West End. The project needs preserve as much	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing	Purpose and Need (2.)



ID	Name	No.	Comment	Response	Reference ¹
			possibility for connectivity, sacrificial slabs where they need to be, intersections where they can go. I noticed the project scope is limited to kind of as it's been defined to ODOT. The city has given criteria. The criteria needs to be further detailed and developed to preserve the opportunity for the future, for future projects that could build off of this. This is the largest piece of infrastructure that our city has ever gotten. This is just the beginning. As active Cincinnati is in this project, we need to constantly be on this project, making sure that this is what we want it to be. There's a massive landmark for our city, and every inch of it needs to be designed.	 local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; and incorporating aesthetic treatments throughout the corridor. Refined Alternative I (Concept I-W) will also build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improve access in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks. Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements. In consideration of feedback provided by the City of Cincinnati Department of Transportation and Engineering, ODOT will design and construct the non-deck components for the new Ezzard Charles Drive bridge over I-75 to not preclude potential future streetcar route<td>Additional Refinements (3.3) Future Design Refinements (3.7) Neighborhood and Community Improvements (4.1.2) Travel Patterns and Access (4.1.4) Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)</td>	Additional Refinements (3.3) Future Design Refinements (3.7) Neighborhood and Community Improvements (4.1.2) Travel Patterns and Access (4.1.4) Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)



ID	Name	No.	Comment	Response	Reference ¹
				expansion. The design modification will not change the footprint or the environmental impacts of the project.	
				Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT, including ideas generated by the City of Cincinnati. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design- build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
B-97	Crenshaw, Nikki	B-97-1	02/21/2025 - Laborers Local 265. I don't have a long drawn out speech and everything because I think I've been touching base with just a little bit of everybody in the room. And I was back there with Ken kind of dibbling and dabbling into some of the perspective of Simon Kenton Way of how the actual building, the actual government building down there is going to be restructured. And have you guys chosen or have been in contact with the Walsh-Kokosing Group in regards to the contractors who will be actually doing that work? Because that money is going to be allocated to the actual city, between the city and the actual state department? That's what I wanted to know, if you guys had already made those decisions already.	The Kenton County Fiscal Court is constructing a new parking garage for the Kenton County Government Center on Simon Kenton Way as part of a separate project that is independent of the Brent Spence Bridge Corridor Project. The Kenton County Fiscal Court is responsible for decisions related to contractors working on the parking garage project.	N/A



ID	Name	No.	Comment	Response	Reference ¹
B-98	Goldsmith, Marzetto	B-98-1	02/21/2024 - 02/21/2024 - Complete Construction of Western Hills Viaduct before starting I-75 ramps off the westside.	The Western Hills Viaduct project is a separate project with independent utility and a completed environmental review that is being developed by the City of Cincinnati. ODOT is coordinating the design of Phase I of the Brent Spence Bridge (BSB) Corridor Project with the City's design of the Western Hills Viaduct project to ensure the projects are designed and constructed with proper maintenance of traffic. It is currently anticipated that the Western Hills Viaduct project would need to start construction first followed by the Phase I of the BSB Corridor Project. Both projects will be under construction at the same time in order to properly manage construction and maintain traffic.	Additional Refinements (3.3)
B-99	Schill, Greg	B-99-1	02/21/2024 - Have contractors, sub-contractors been selected yet for this project? If not, when?	KYTC and ODOT executed a contract with the progressive design-build team for Phase III of the Brent Spence Bridge (BSB) Corridor Project (Dixie Highway in Kentucky to Linn Street in Ohio) in October 2024. The contract for Phase II (Linn Street to Findlay Street in Ohio) is expected to be awarded in February 2026. The contract for Phase I (Findlay Street to Marshall Avenue in Ohio) is expected to be awarded in October 2028. There are still opportunities for subcontractors to work on the project. Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrentSpence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Project Description (1.1)
		B-99-2	02/21/2024 - How long is this project expected to last?	Construction on Phase III of the BSB Corridor Project is expected to begin in 2025 and be substantially complete by 2030. Construction on Phase II is expected to begin in 2026 with completion in 2031. Construction of Phase I is expected to begin in 2029 and be completed in 2032.	Project Description (1.1)



ID	Name	No.	Comment	Response	Reference ¹
B-100	Hischak, Ronald	B-100-1	02/21/2024 – 5 th street, 6 th street, 7 th street, and 9 th street ramps need to be turned into 2 way urban streets connecting downtown to Queengate. 6 th street expressway needs to be converted into a 4 lane urban street. Winchal St. & Western Ave need to be converted into 2 way streets.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. All existing local street connections across I-75 are maintained, and Refined Alternative I (Concept I-W) connects to the existing downtown traffic configuration of one-way pairs in both Covington and Cincinnati. The City of Covington and the City of Cincinnati are responsible for decisions regarding the conversion of local one-way streets for two-way traffic within those municipalities. Refined Alternative I (Concept I-W) also provides new and improved pedestrian and bicycle infrastructure on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor. Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. KYTC and ODOT will evaluate ideas generated by local municipalities during the innovation process. During the evaluation of innovation concepts	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				evaluating reconfiguring 6 th Street in Cincinnati to accommodate two-way traffic. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
B-101	Anonymous	B-101-1	02/21/2024 - The design should restore the street grid and dramatically narrow the footprint and be pedestrian friendly. Very disappointing to see that the city of Cincinnati willing is not at all taken into account despite months of "codesign."	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor.	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT, including ideas generated by the City of Cincinnati. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design- build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
B-102	Weidl, Gerhard (Garry)	B-102-1	02/21/2024 - There is a natural megaphone/valley along I75 south of the west side entrance ramp starting between Wakins St & Old Hinde St. This amplifies all road noise to all the houses/backyards & porches that surround this valley, especially those along Hermes Ave. Looks like the western most noise barrier leaves the valley open without a continuous wall at the very least, it must have no opening there! Ideally, if this valley could be brought up closer to street level with a significant soil barrier as the base of a wall sitting on top.	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the portions of the corridor that include Watkins Street and Hinde Street in a <u>Traffic Noise Impact Analysis: Brent</u> <u>Spence Bridge Corridor Project Kentucky – Northern</u> <u>Section</u> (August 2023) and a <u>Noise Analysis Technical</u> <u>Memorandum Kentucky – Northern Section</u> (November 2022). As a result of those studies, KYTC is proposing a noise barrier on the west side of I-71/I-75 from West 3 rd Street to south of Hermes Avenue, which includes the area referenced by the commenter. The noise barrier in this area consists of several stand-alone noise walls. The proposed noise walls are located immediately adjacent to I-71/I-75 in the vicinity of Watkins Street and at the top of the slope west of the interstate in the vicinity of Hermes Avenue. The placement of the stand-alone noise walls was determined based on a barrier analysis and was determined to provide the greatest noise reduction in this noise sensitive area. The proposed noise barrier was	Noise - Kentucky (4.8.1)



ID	Name	No.	Comment	Response	Reference ¹
				found to be feasible and reasonable when situated in the existing topography without the need to place any additional fill in the area.	
				During detailed design, and in accordance with the KYTC Noise Analysis and Abatement Policy, a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise and noise/visual screening barriers (benefitted receptors) at each location where they are proposed in Kentucky. KYTC will further evaluate the space between the stand alone noise walls in the area referenced by the commenter during detailed design and the noise public involvement process.	
		B-102-2	02/21/2024 - Additionally, I think the houses surrounding this valley should be offered new windows & insulation for the homes to help mitigate the hwy noise which is apparent in them now sadly as it has been our back yards & porches have largely been unusable.	The KYTC <i>Noise Analysis and Abatement Policy</i> does not allow for the consideration of noise insulation as a noise abatement measure for residential dwellings. Land uses that are eligible for noise insulation include auditoriums, day care centers, hospitals, libraries, medical facilities, places of worship, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, schools, and television studios.	Noise - Kentucky (4.8.1)
B-103	Jacob, Matt	B-103-1	02/21/2024 - The Ezzard Charles bridge should include 2 sacrificial slabs for future streetcar rails. This was done for Main & Walnut during FWW and it save the project money in the short term and left the door open for a less expensive building of the future street car tracks. Given public maps with future streetcar expansion using Ezzard Charles to connect to Union Terminal/Amtrak, this project MUST proceed with foresight when building this bridge by including sacrificial slaps in the roadbed that can be more easily removed later (not connected to the rebar structure)	In consideration of feedback provided by the City of Cincinnati Department of Transportation and Engineering, ODOT will design and construct the non-deck components for the new Ezzard Charles Drive bridge over I-75 to not preclude potential future streetcar route expansion. The design modification will not change the footprint or the environmental impacts of the project.	Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)



ID	Name	No.	Comment	Response	Reference ¹
		B-103-2	02/21/2024 - The proposed alignments from 9th St. to I 71 west of downtown is way too sprawling. It needs to be more compact like it was done with Fort Washington Way & 2 nd /3 rd St. This revised plan has not addressed the problems with the initial design. There are only 2 pedestrian crossing s across 75 & the local street grid is not continued - instead left as green fields that will be harder for new development. The pedestrian crossing distance over 75 is massive & need brought closer to 200 feet max.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor. Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge Corridor Project. It is anticipated that the design-build team for the Phase III progressive design refinements) that will be evaluated by KYTC and ODOT, including ideas generated by the City of Cincinnati. Innovations that improve project quality, reduce costs, shorten schedule, support at the local level may be incorporated into the project. Some of the design- build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Travel Patterns and Access (4.1.4)



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				across the interstate; and building the project with a context sensitive design that fits within the community.	
		B-103-3	02/21/2024 - Sacrificial slabs should also be included in the Linn St bridge & 5 th Street Bridges.	Refined Alternative I (Concept I-W) will not accommodate potential future streetcar route expansion on the Linn Street and 5 th Street bridges.	Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)
B-104	Shafer, Claire	B-104-1	02/21/2024 - Please consider the bridge forward proposal to utilize the money being spent to improve all aspects of our city. Our city is known for the incredible architecture, lets make it know for its great city planning. We did it on Fort Washington Way. Let's do it for this project. A great city design improves health and wellbeing, supports businesses, and attracts visitors. We can do way better than just replacing like for like. We have the opportunity to make it better for everyone. Thank You!	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. Features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices. Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing Brent Spence Bridge (BSB) for local traffic as part of the collector-distributor roadway system and a new double-decker companion bridge to the west for through (interstate) traffic. In addition, performance- based design principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's	Purpose and Need (2.) Alternatives (3.) Future Design Refinements (3.7) Public Comments (5.1.1)



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				footprint and impacts to the communities in the project area.	
				Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District.	
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary (January 2024)</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
B-105	Harmon, John	B-105-1	02/21/2025 - Provide details on ground water protection plan for the Great Miami Aquafer (GMA) are new monitoring wells needed and being deployed? What about surface water sampling to determine infiltration impacts to the GMA.	The Great Miami Aquifer is not located in the Brent Spence Bridge Corridor Project area and therefore is not expected to have potential effects.	Drinking Water (4.2.7)
		B-105-2	02/21/2024 - Please provide details for mitigation measure taken for streams, river,	Mitigation measures for wetland impacts may involve the debit of credits from KYTC's Bath County/Ova Arnett advanced mitigation site. While the mitigation measures	Wetlands (4.2.1)

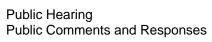


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			and wetland impacts. Also provide details for planned mitigation measures.	will be finalized in coordination with the U.S. Army Corps of Engineers (USACE) and the Kentucky Division of Water (KDOW) during the permitting process, compensatory mitigation for wetlands may require up to eight adjusted mitigation units. Adjusted mitigation units are the number of credits needed to compensate for project impacts to waters of the United States (including wetlands and streams/rivers). The determination of the required number of adjusted mitigation units considers factors such as the type, quality, and function of the resource.	Streams and Rivers (4.2.2)
				Sufficient credits to mitigate wetland impacts for Refined Alternative I (Concept I-W) are presently available at the Bath County/Ova Arnett mitigation site. The credits will be used to offset unavoidable impacts to wetlands in the lower Licking River watershed, Northern Kentucky mitigation service area. The Bath County/Ova Arnett advanced mitigation site restored wetland habitat functions to previously farmed land in the same river basin (Licking River) and mitigation service area (Northern Kentucky) as the impacted wetlands.	
				Should there be insufficient credits at the Bath County/Ova Arnett mitigation site, KYTC will make the necessary purchase of wetland adjusted mitigation units from the In-Lieu Fee Mitigation Program administered by the Kentucky Department of Fish and Wildlife Resources (KDFWR). All in-lieu fee credits purchased from KDFWR are used to repair and restore wetlands in the same service area as the impacted wetlands (the lower Licking River/Northern Kentucky mitigation service area).	
				Mitigation measures for unavoidable stream and river impacts are anticipated to involve the purchase of adjusted mitigation unit credits from the approved USACE mitigation bank in the watershed, the Licking River Mitigation Bank operated by Ecosystem Investment Partners. While the mitigation measures will be finalized in coordination with USACE, KDOW, and Ohio Environmental Protection Agency (OEPA) during the permitting process, KYTC has secured sufficient credits to	



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				provide mitigation for the estimated stream and river impacts for Refined Alternative I (Concept I-W). All adjusted mitigation unit credits purchased from the Licking River Mitigation Bank represent restored ecological functions to streams in the appropriate mitigation service area of the unavoidable stream and river impacts (lower Licking River watershed/Northern Kentucky mitigation service area). Beyond those measures detailed for stream, river, and wetland impacts above, it is unclear for which additional planned mitigation measures the commenter is requesting additional details; therefore, further response to this comment cannot be provided.	
		B-105-3	02/21/2024 - Please provide me with a list of the business that were selected for relocation. Please identify as follows: 1. Already relocated 2. Yet to be relocated.	In Kentucky, the following business has already been relocated: Dusty Boots Classic Auto Service. KYTC is currently in the process of relocating the following businesses: River Center Collision/Performance Select Cars (3 buildings), Rusk Heating and Air Conditioning, and Christian Broadcasting System (a radio tower). In Ohio, the following businesses have already been relocated: dunnhumby USA headquarters, Phoenix Graphic, Gold Star Chili, Energy Night Club, Game Day Communications, Cincy Escape Room, Marketing Centre, Real Equity, Black Light Production, Blue Board, IWDWD	Relocations (4.1.5)
				Studios, Fisher Design, Zillow Storage/Dot Loop, a vacant bar/nightclub, and a vacant gas station. In addition, ODOT has already completed the partial relocation of property owned by E & T Real Estate Holdings. ODOT is currently in the process of relocating the following businesses: Event Storage Area for Longworth Hall, Barefoot/Sterling, Executive Studios, and Millimeter Creative.	
B-106	Aldridge, Cameron	B-106-1	02/21/2024 - I'm here with Civic, so my comments are mainly with the in regards to space taken up on the Ohio side, mainly with the I-75 and I-71 junction that's on there. I think that more effort needs to be put into shrinking the footprint that's taken up by that junction and	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New	Purpose and Need (2.) Additional Refinements (3.3)





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			also in reestablishing that street grid system. The Queensgate area over here, where we are right now, used to be a very thriving community a lot of housing used to be over here. And I think that taking efforts to develop that and reestablish that street grid system and connecting the downtown community to this area would be hugely effective for the city. We've seen in the early 2000s the development that went to the Banks. I think the economic impact from that redevelopment was hugely beneficial for the city and the Banks system. Connecting that both for pedestrians and just reestablishing that street system, I think that's the main thing that we just need to focus on is reducing the size and the space that's taken up so it's much more easier for pedestrians to get from the downtown system over to Queensgate and back. There's a lot of space being taken up by the junction. I think more efforts can be put into shrinking that system.	and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land formerly occupied by the dunnhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge. Additional enhancements incorporated into the project include reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; incorporating aesthetic treatments throughout the corridor, and providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods in Ohio. Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge (BSB) Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be	Future Design Refinements (3.7) Travel Patterns and Access (4.1.4) Public Comments (5.1.1)



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				include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
		B-106-2	02/21/2024 - There's an organization called Bridge Forward that's put up some great design proposals that I'm really behind. I like their systems that they set up. I think it does a lot better job at connecting those communities. That junction is right there on the river. Some of the most valuable real estate in the whole city is right there by the river. So I think a lot of thought needs to be put into shrinking that down and connecting those communities.	Refined Alternative I (Concept I-W) meets the project purpose and need and maintains or improves existing local connections. In addition, features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward. These include minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices. Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing BSB for local traffic as part of the collector-distributor roadway system and a new double- decker companion bridge to the west for through (interstate) traffic. In addition, performance-based design principles have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District.	Purpose and Need (2.) Alternatives (3. Future Design Refinements (3.7) Neighborhood and Communit Cohesion (4.1.2) Public Comments (5.1.1)



ID	Name	No.	Comment	Response	Reference ¹
				Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary (January 2024)</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
B-107	Wettengel, John	B-107-1	 02/21/2024 - I'm not here with any organization. My main comments would be that we really need to look to reduce the size of the interstate as much as possible. And then more importantly than that, in my opinion, is reconnecting the street grid to the Queensgate area. Getting ten acres back, 13 acres back, however many you can get back by just reducing the size of the freeway is good. But when you connect the street grid to a new area, you get hundreds of acres of land that is now feeling more connected to the downtown area and feeling more connected to places with our things. So, you really get hundreds of acres of developable land back by doing this. I think when building this project, we need to be very cognizant of the fact that this is not a project that's going to only be here for the next 20 years. It's going to be here for 70 to 100 years. So, what's built has to be something that in 70 years, you look back at and you say, I'm glad we built the project in the way we built it. If 	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land formerly occupied by the dunnhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2) Travel Patterns and Access (4.1.4) Public Comments (5.1.1)

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			the final piece of concrete gets poured and you look at the project and you go, wow, that's only all right. We did less than we could do, it's going to be very disappointing. It'll be something that you're not disappointed with just when it's finished, but that you're disappointed with for the next 70 years, that my kids will be disappointed with what they're looking at. So, I think that every single consideration has to be made to reconnect the street grid and to shrink the footprint of this project so that we can look back when we're done in 20 years and be very proud of the work that's been done on this project. Thank you.	retaining walls, and reducing the width of the companion bridge. Additional enhancements incorporated into the project include reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; incorporating aesthetic treatments throughout the corridor, and providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75. Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements. Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
B-108	Kenat, Steve	B-108-1	02/21/2024 - I'm an architect. I'm the director of community development for SHP and I'm a downtown Cincinnati resident. I've also been a member of the City of Cincinnati DOTE's Brent	As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the Brent Spence Bridge (BSB) Corridor	Purpose and Need (2.)



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			Spence Advisory Committee. So, I respect the work of ODOT, KYTC and DOTE here that's been put into this project since 2010. I'm especially grateful for the revisions that have been made in the last twelve months. In working with individuals and groups like Bridge Forward as an advocacy group, the plan has definitely improved.	 Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary</i> (January 2024). Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. Features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices. Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing BSB for local traffic as part of the collector-distributor roadway system and a new double-decker companion bridge to the west for through (interstate) traffic. In addition, performance-based design principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District. 	Additional Refinements (3.3) Public Comments (5.1.1)



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		B-108-2	02/21/2024 - We think it can be improved better by part of the continuing the innovation as was described as part of the progressive design build process. This is a once in a century opportunity that we have. So why are we continuing to advocate for this, for a similar solution as Fort Washington Way? Because expanding downtown creates an opportunity for downtown to grow. Convention Center, arena, housing, a mix of things that we need in order to position ourselves for the future. Expanding downtown reduces the remaining gap into Queensgate and as was described, that can also become a connected, mixed use neighborhood. Expanding the street grid into Queensgate makes both sides of I-75 more accessible, more safe for pedestrians, for bikes, and for drivers. A \$3.6 billion infrastructure project ought to be able to solve more than one problem. It's not just about bridge congestion. If people are passing through the city, that's great. We want them to have safe passage, but it needs to support those who live here and those we want to continue to attract so the city can continue to thrive. The reference benefit to \$100 million, which is the price tag that has been talked about for Bridge Forward, advocates could unlock \$3.3 billion of future investment and economic impact. So, we think that the long view for this project is one that should really support the work in the West End and continue thriving in the city.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. Refined Alternative I (Concept I-W) will also build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks. In support of the KYTC <i>Complete Streets, Roads, and</i> <i>Highways Policy</i> , the ODOT <i>Multimodal Design Guide</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) <i>Regional Complete Streets Policy</i> , Refined Alternative I (Concept I-W) will promote safety for bicyclists and pedestrians. The frontage roads and ramp connections with local streets are being designed as lower-speed urban roadways, which will encourage drivers to decelerate to safe speeds prior to reaching bicycle and pedestrian crossings. Furthermore, the buffer distance between automobile traffic and sidewalks and shared-use paths will be increased, improving bicyclist and pedestrian safety and comfort. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-b	Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2) Travel Patterns and Access (4.1.4)

BRENT SPENCE BRIDGE CORRIDOR

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				contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community. During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
		B-108-3	02/21/2024 - I'm a downtown resident and an architect. I want to thank you for this opportunity. It feels like the city is kind of at a tipping point, right? We are growing. We are hemmed in. We have hillsides around us. We have a wonderful neighborhood in Over the Rhine. We have a river. The West End and Queensgate is the only place that downtown really has an opportunity to grow, which is why we talk about this in the terms of being once in a century, the momentum of things that are already happening downtown. Investing in our convention and visitor center district. The only way that can become a district is if it's not on the edge of downtown. It needs to be surrounded.	The City of Cincinnati is responsible for local land use planning and decisions. KYTC and ODOT are continuing to coordinate the project with the City of Cincinnati to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area.	Ongoing Public & Stakeholder Involvement (5.6)
			The only way the West End can continue to thrive is by making some of these adjustments that we've been asking for infrastructure. So, this project can either further hinder, we can talk about how 25,000 residents were moved out of the West End. This project can either start to reframe that and recover that land, or it can slow it down. It may not stop it, but there are things that we can do as part of this project that really propel the city forward. So that's why		



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			we're here. We are grateful for the opportunity. So, thank you again.		
B-109	Rigand, Morgan	B-109-1	02/21/2024 - I'm a resident in West Fourth Historic District on the Cincinnati side. My husband has enjoyed living there for the better part of the last decade and we look at Brent Spence Bridge every day out of our bedroom window. So, we are so thankful that our two states have been able to come together, and experts have been able to come together to address this need and rally folks at a national level to come behind this project and support it. We also know that now is the time to connect downtown with Queensgate and to extend our street grid to that neighborhood and open up our neighborhood to stretch its arms back out to Queensgate as it once had previously enjoyed that connectivity. We know that it would enliven our neighborhood to add housing. And while adding ten acres to our neighborhood of buildable land is excellent, we know that 30 acres could be a footprint for answer to our affordable housing crisis and so much more. So, I hope that you will continue the process of working with Bridge Forward to develop these ideas and work together to continue to improve that connectivity between downtown and Queensgate. Thank you very much.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. Features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices. Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing Brent Spence Bridge (BSB) for local traffic as part of the collector-distributor roadway system and a new double-decker companion bridge to the west for through (interstate) traffic. In addition, performance- based design principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's	Purpose and Need (2.) Alternatives (3. Future Design Refinements (3.7) Travel Patterns and Access (4.1.4) Public Comments (5.1.1)

ID	Name	No.	Comment	Response	Reference ¹
				footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District.	
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary (January 2024)</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
B-110	Walton, Douglas	B-110-1	02/21/2024 - I'm representing myself. Everybody that's spoke before me has kind of already took my thunder, but I'm going to say what I need to say anyway. I think the plan	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic	Purpose and Need (2.)





ID	Name	No.	Comment	Response	Reference ¹
			needs continuous improvement, and I think that it needs to be adjusted to mainline to allow I-75 for more land to be returned to the city. I think we need to reestablish the historic street grid between downtown and Queensgate for all blocks from 5 th Street to 9 th street. We need to shrink the walking distance between downtown Queensgate to 460 feet. Doing all the above would generate 3.4 billion in economic return by providing local street access to all sides of the land returned. And, also, we would achieve a sort of restorative justice from the horrible urban renewable projects of the 50s and 60s. My mother lived in Kenyon-Barr district, and she had to move out of her house to make way for the original freeway, which I think is horrible. And also with that land, I think with that 40 acres you could build housing, you could do mixed-use housing, you might do an innovation hub or things like that, make another park, connect it to Smale Park. So, I think all of those things need to be done, and hopefully it will be done. Thank you.	 where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor. Refined Alternative I (Concept I-W) results in a minor contribution to cumulative business displacements; stormwater runoff; and loss of parkland, wetlands, streams, and threatened and endangered species habitat. Based on the evaluation of direct impacts contained in the supplemental Environmental Assessment, Refined Alternative I (Concept I-W) will improve community cohesion, improve traffic flow and safety for all modes of travel, provide additional economic opportunities, improve air quality, abate noise, improve aesthetics, and reduce flooding and storm sewer overflows, which will offset negative cumulative effects resulting from Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation 	Additional Refinements (3.3) Future Design Refinements (3.7) Travel Patterns and Access (4.1.4) Cumulative Effects (4.10.2)

ID	Name	No.	Comment	Response	Reference ¹
				concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
B-111	Didrichson, Barbara	B-111-1	02/21/2024 - I'm a resident of Cincinnati. I'm too young to remember the city of Cincinnati before the freeway system, but I am old enough to remember being a very young child riding a bus along Central Parkway with my mother when it was under construction, and it's a vivid memory of that big gash in the land separating our city. I really can appreciate all the work that you've been putting into this project, all the ways that you are trying to address the concerns that we have. But this is a once in a generation chance for us to be able to correct a very severe wrong that was done many years ago to reconnect parts of our city that have been disconnected from us ever since that time. I'm here in support of the Bridge Forward plan to the extent possible.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. Refined Alternative I (Concept I-W) will also build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2) Travel Patterns and Access (4.1.4)
			I hope we can continue to get you to work with them to refine the plan, and I appreciate that you've made it a progressive plan that leaves room to that. And I want to restore the street grid, reconnect Queensgate and the West End with the rest of Cincinnati, enhance opportunities for pedestrians and cyclists. I	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community	Public Comments (5.1.1)

Public Hearing Public Comments and Responses

BRENT SPENCE

ID	Name	No.	Comment	Response	Reference ¹
			actually get out on a bicycle myself a lot of times riding to the city, and I would appreciate a lot more opportunities to be able to do that safely. So, thank you very much. Appreciate it.	benefits. Features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices.	
				Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing Brent Spence Bridge (BSB) for local traffic as part of the collector-distributor roadway system and a new double-decker companion bridge to the west for through (interstate) traffic. In addition, performance- based design principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati CBD.	
				Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract	



ID	Name	No.	Comment	Response	Reference ¹
				objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community. As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary (January 2024)</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
B-112	Thach, Lauralee	B-112-1	02/21/2024 - I'm here representing myself as a resident of the city of Cincinnati. I greatly appreciate all the work that has been done so far on this project, to take in public comment, to take in what organizations have said about this project, and to do further environmental concerns. However, I do believe that more it's necessary to truly do this project justice. Like everybody has said, and I will say, this is a once in a lifetime opportunity. This is something that we will look back for generations and we will want to have done in a way that benefits us now and us in the future. I believe that this bridge needs to reconnect the communities of downtown and the West End.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. Refined Alternative I (Concept I-W) will also build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2) Travel Patterns and Access (4.1.4)

ID	Name	No.	Comment	Response	Reference ¹
			The I-75 mainline needs to be adjusted to allow for further regeneration of land in the downtown area. We need to make this plan better for pedestrians, and we need to make this plan better for cyclists. We need to make this plan better for our future. I am disappointed that more has not been done already. To support plans such as Bridge Forward or other considerations that reduce the footprint of this plan. And I look forward to seeing how this plan will take into consideration everybody's concerns that have been said tonight and how we will connect our community, as Cincinnati is wanting to do.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. Features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices.	Public Comments (5.1.1)
				Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing Brent Spence Bridge (BSB) for local traffic as part of the collector-distributor roadway system and a new double-decker companion bridge to the west for through (interstate) traffic. In addition, performance- based design principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District.	
				Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	



ID	Name	No.	Comment	Response	Reference ¹
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary (January 2024)</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
		B-112-2	02/21/2024 - I would like to come back up here to reiterate what a lot of people have been saying. Just to make sure that you guys know, these opinions are shared throughout a lot of people. I would like to reiterate that air quality will decrease with the implementation of this bridge. Emissions will increase with the implementation of this bridge, and we will be creating a lot more air pollution by creating a lot more traffic.	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone. KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and	Air Quality (4.6)



ID	Name	No.	Comment	Response	Reference ¹
				2050 build scenarios and documented the results in a <u>Quantitative MSAT Analysis Report</u> (August 2023). The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source	



ID	Name	No.	Comment	Response	Reference ¹
				emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-112-3	02/21/2024 - Induced demand is real. I'm sure you guys know this as traffic engineers, that adding more lanes will not reduce congestion. The studies show that induced demand shows that there are more opportunities for cars to go somewhere, the cars will take that opportunity. Data also shows that we don't need more lanes. Traffic has been decreasing on the Brent Spence Bridge recently as more people have shifted their mindsets in regards to cars.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the Ohio- Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8)
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making	



ID	Name	No.	Comment	Response	Reference ¹
				from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-112-4	02/21/2024 - This plan was originally made in 2012. So much of public mind has changed since 2012. I know, just me personally and many other people I know have gotten more into new urbanism, more pedestrian and bike focused techniques. Everybody has become more educated about how cars are not always the best mode of transportation. And, therefore, this plan that was made a long time ago and has changed minorly since then does not best reflect the needs of the public today and how we wish to be going forward. An example of what we could do with this is what we did with the Banks. Shrink the footprint. The original plan for the banks was much larger and we successfully were able to create what was necessary and shrink the footprint. Now we have a beautiful Banks district and still the mobility of the interstate through there.	Since 2012, KYTC and ODOT have conducted a Value Engineering Workshop (October 2012), a Performance- Based Design Workshop (December 2019), and other studies and activities to identify and evaluate measures to improve the design and constructability of the project while reducing the costs and impacts. Further refinements were identified through ongoing coordination with local municipalities, through additional public outreach, and as portions of the project progressed through more detailed design. These combined efforts culminated in a set of refinements that have been designated Refined Alternative I (Concept I-W) and are the focus of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) incorporates several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land formerly occupied by the dunnhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge. Refined Alternative I (Concept I-W) also provides new or improved sidewalks on local streets that are parallel to or cross the interstate.	Project History (1.2) Additional Refinements (3.3)
		B-112-5	02/21/2024 - I would also like to mention that as somebody who does not own a car and who does not plan to own a car, like many people in	A <u>Socioeconomic Technical Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on several populations and groups, including zero-car households. The analysis concluded that Refined Alternative I (Concept I-W) would have no	Future Design Refinements (3.7)



ID	Name	No.	Comment	Response	Reference ¹
	Name	NO.	Comment Cincinnati, this plan will only damage our communities and not connect them. Thank you.	 impacts to pedestrian, bicycle, and transit access and mobility. Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks. Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that 	Reference ⁷ Travel Patterns and Access (4.1.4) Socioeconomic Groups (4.1.8)
				use the existing BSB for 210 trips every weekday, thus benefitting individuals who utilize these transit routes, including zero-car households. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce	
				 costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts may provide additional benefits to zero-car households, including: improving neighborhood connectivity across the interstate; building the project with a context sensitive design that fits within the community; minimizing physical 	



ID	Name	No.	Comment	Response	Reference ¹
				intrusion and impact; and designing for sustained quality of life.	
B-113	Curran, Chris	B-113-1	02/21/2024 - I live in Ohio, work in Kentucky, well aware of the need for safe transit over the Ohio River. I have been an advocate for clean air and clean water for over half a century, and I believe it's complete environmental injustice to spend \$3.6 billion on a single mode of transportation.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access. Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing Brent Spence Bridge (BSB) for 210 trips every weekday. In addition, new and improved sidewalks,	Purpose and Need (2.) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-113-2	02/21/2024 - It's very discouraging reading that there would be no disproportionate impacts on low-income, on zero car households, adults with disabilities, older adults, many people cannot drive. So, a one-horse, one highway solution is, as I said, a complete environmental injustice.	 An Environmental Justice Analysis Report (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The environmental justice (EJ) analysis was conducted in accordance with the U.S. Department of Transportation Order 5610.2C and FHWA Order 6640.23A, which define disproportionately high and adverse effects. The EJ analysis also followed FHWA's <i>Guidance on Environmental Justice and the National Environmental Policy Act</i> (December 16, 2011). The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on EJ populations: No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; No adverse indirect and cumulative effects; No disproportionately high and adverse relocation, noise, or temporary construction effects; and Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved acess, mobility, and safety for all modes of travel; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood. A Socioeconomic Technical Report (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on older adults, individuals with limited English proficiency, adults with disabilities, and zero-car households. The analysis concluded that Refined 	Environmental Justice (4.1.7) Socioeconomic Groups (4.1.8)



ID	Name	No.	Comment	Response	Reference ¹
				Alternative I (Concept I-W) would result in the following effects on these socioeconomic populations and groups:	
				 No impacts to community resources; pedestrian, bicycle, and transit access and mobility; safety; air quality; stormwater; and workforce development; 	
				- No indirect impacts;	
				- No substantial noise impacts;	
				 Minimal relocation and greenhouses gases and climate change impacts; 	
				 Minor vehicular access and mobility; visual setting; cumulative; and temporary construction impacts; and 	
				- Benefits due to mitigation and enhancements for parks and historic properties; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics and visual character; and direct and indirect workforce enhancements.	
		B-113-3	02/21/2024 - The increase in traffic that is projected doesn't match what the highway traffic counts are. These were from ODOT for year after year after year. So, either the purpose and need is misguided, 16 lanes is way too much, or we are going to have tremendous air pollution.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the Ohio- Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8) Air Quality (4.6)
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and	



ID	Name	No.	Comment	Response	Reference ¹
				calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods. Air quality studies prepared for Refined Alternative I (Concept I-W) utilized 2020 existing, 2050 no-build, and 2050 build traffic forecasts that were developed using the same OKI travel demand model of record that was used to develop the certified traffic projections that were used for the traffic operational analyses for the project. The air quality studies concluded that Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	
		B-113-4	02/21/2024 - I've been monitoring the ozone, which is normally high in the summer, in the winter it's been moderate. That doesn't sound bad. But when you're asthmatic, like I am, in 13% of our community, that's a health disparity and environmental injustice.	In November 2022, OKI completed a regional emissions and air quality conformity analysis demonstrating that the 2021-2024 Transportation Improvement Program and 2050 Metropolitan Transportation Plan conform to all applicable U.S. Environmental Protection Agency approved State Implementation Plans for air quality. The project is included in OKI's air quality conforming 2021- 2024 Transportation Improvement Program and 2050 Metropolitan Transportation Plan. Furthermore, the design concept and scope of Refined Alternative I (Concept I-W) have not changed substantially from what is described in the Transportation Improvement Program. Therefore, no	Environmental Justice (4.1.7) Disadvantaged Communities (4.1.9) Air Quality (4.6)



ID	Name	No.	Comment	Response	Reference ¹
				additional transportation conformity analysis is required related to ozone for Refined Alternative I (Concept I-W).	
				Air quality effects on environmental justice (minority and low-income) populations were evaluated in an <u>Environmental Justice Analysis Report</u> . Air quality evaluations considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone. In addition, a <u>Quantitative MSAT Analysis Report</u> (August 2023) concluded that Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on mobile source air toxics (MSAT) emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the EJ study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the EJ study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the EJ study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County.	
				Twenty (20) percent of the census block groups with minority and/or low-income populations in the EJ study area are in Kenton County; therefore, the slightly greater level of PM2.5 when the 2050 build scenario is compared to the 2050 no-build scenario will not be predominately borne by EJ populations nor is it appreciably more severe or greater in magnitude than the level of PM2.5 emissions for the non-EJ population.	
				KYTC and ODOT evaluated the effects of Refined Alternative I (Concept I-W) on health burdens in disadvantaged communities in a <u>Socioeconomic</u>	



ID	Name	No.	Comment	Response	Reference ¹
				<u>Technical Report</u> . The analysis concluded that Refined Alternative I (Concept I-W) will not further contribute to health burdens; rather, Refined Alternative I (Concept I- W) may result in potential better health outcomes for those with asthma, diabetes, heart disease, or low life expectancy due to improved access to healthcare destinations, improved options for active transportation, and improved air quality due to improved traffic flow and reduced vehicle idling.	
		B-113-5	02/24/2024 - The storm water may be separated from the combined sewers, but funneling it into a 150 year old brick sewer on the Ohio side is poor design. Something is going to go wrong. The stormwater itself has been documented to have high levels of toxic metals since the 1990s. Nothing in the plan says what you're going to do to mitigate that. A lot more needs to be done. Thank you.	In the Cincinnati area, transportation projects must address both the quantity and quality of stormwater runoff, both by separating stormwater runoff from combined sewer systems and providing measures known as best management practices (BMPs) to reduce stormwater pollutants. ODOT and the Metropolitan Sewer District of Greater Cincinnati (MSD) have held multiple coordination meetings to discuss drainage design. The stormwater system along the BSB corridor in Ohio will be completely replaced, and the new system will be designed to meet current ODOT standards. The project will separate highway drainage from the existing combined sewer system in Ohio, and ODOT will partner with MSD to build infrastructure to drain directly to Mill Creek and/or the Ohio River.	Utilities (4.12.1)
				To address water quality treatment requirements in Ohio, vegetated options for stormwater BMPs will be utilized to the maximum extent practicable. Given the dense urban land use in the project area, the majority of the stormwater BMP treatment requirements will be addressed via off-site mitigation. In late 2022, ODOT and Ohio Environmental Protection Agency began discussions regarding providing offsite mitigation at a 1.5:1 ratio in the I-74 median within the same watershed as Phases I and II of the BSB Corridor Project. The technical review of the offsite mitigation will be completed during detailed design, and ODOT will continue to coordinate with Ohio Environmental Protection Agency as each project phase progresses through detailed design.	



ID	Name	No.	Comment	Response	Reference ¹
				The existing brick sewer referenced by the commenter is outside the project area and owned by MSD. During detailed design, MSD will inspect and make recommendations on needed repairs for this piece of infrastructure. The required work for the separation of interstate stormwater runoff that will be incorporated into the BSB Corridor Project will be finalized during detailed design and through ongoing coordination between ODOT and MSD. MSD will continue to own and maintain this sewer.	
B-114	Devery, Kerry	B-114-1	02/21/2024 - I am a resident of the city of Cincinnati, and I also work at the edge of the downtown basin. I would like to see, like, a full environmental study because some of the assumptions don't seem very clear to me in the supplemental.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	d during detailed n between ODOT I maintain this sment (EA) has f the Code of .129 and 771.130 ements, changed e previously ostly reductions), hancements and ronmental Policy is that have of No Significant is intended to of refined project ed in the approved al studies examined and al requirements. Air Quality (4.6)
		B-114-2	02/21/2024 - I'm specifically thinking about how it talks about emissions and greenhouse gas will go down with this plan, and it just seems very unlikely. The assumptions in the report are saying that it'll go down because of reduced congestion and adoption of electric vehicles, if I remember correctly, and that just seems very unlikely, especially over the next 30 years. There's been, in the recent retail market, there's been a huge drawback in sales and EV's showing that there's not as much appetite	Act reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and	Air Quality (4.6) Greenhouse Gases and Climate Change (4.7)



ID	Name	No.	Comment	Response	Reference ¹
			for them as we realized especially since a lot of that kind of adoption rate is based off of subsidy. So, if the federal government doesn't pursue those subsidies, then the adoption rate is just not going to be there. Additionally, it's going from four lanes to eight lanes. So, you're bringing a ton of cars, you're doubling the capacity on the bridges, so you're going to bring a ton of emissions with them. Congestion might be reduced, but then eventually congestion is going to kick back in again. So, then we'll have worse emissions than we have now in ten years, 20 years into the project lifecycle.	Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. MOVES is USEPA's official model for state implementation plans and transportation conformity analyses and the emissions model used for the quantitative MSAT emissions analyses. The <i>Quantitative MSAT Analysis Report (August 2023)</i> concluded that the emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no- build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no-build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no-build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions. The emissions burdens analysis concluded that emissions of volatile organic compounds, nitrogen oxides, and PM2.5 would be substantially reduced for both the 2050 no-build and 2050 no-build scenarios when compared to the 2020 existing scenario. Consistent with USEPA's analysis methodology, these reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not	



ID	Name	No.	Comment	Response	Reference ¹
				considered to be significant. Given the above, Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
				The evaluation of greenhouse gases and climate change prepared for the supplemental EA followed the guidance issued by the Council on Environmental Quality using methodologies discussed and in consultation with USEPA. The analysis was conducted at a quantitatively high level using MOVES, which is USEPA's official model for state implementation plans and transportation conformity analyses and is listed by the U.S. Department of Transportation as the most common approach for modeling greenhouse gas emissions for transportation projects. The greenhouse gas emissions analysis was conducted using travel demand models for the project's approved certified traffic.	
				Consistent with USEPA's analysis methodology, greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions	



ID	Name	No.	Comment	Response	Reference ¹
				are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to a 1.7 percent increase in total vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). The analysis concluded that greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
		B-114-3	02/21/2024 - And that's what I also haven't seen is why is it eight lanes? My understanding is based off of future modeling, 30 years in the future. But how many lanes do we need for today's traffic? Because we don't want more traffic, we don't want more emissions. And if you don't build eight lanes, we won't get eight lanes of traffic.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8)
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The Interchange	



ID	Name	No.	Comment	Response	Reference ¹
				<u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-114-4	02/21/2024 - And finally, just allow for more street grid, more land capture and conversion of two ways in downtown, both in Cincinnati and Covington.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. All existing local street connections across I-75 are maintained, and Refined Alternative I (Concept I-W) connects to the existing downtown traffic configuration of one-way pairs in both Covington and Cincinnati. The City of Covington and the City of Cincinnati are responsible for decisions regarding the conversion of local one-way streets for two-way traffic within those municipalities. Refined Alternative I (Concept I-W) also provides new and improved pedestrian and bicycle infrastructure on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Travel Patterns and Access (4.1.4) Public Comments (5.1.1)



ID	Name	No.	Comment	Response	Reference ¹
				design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. KYTC and ODOT will evaluate ideas generated by local municipalities during the innovation process. During the evaluation of innovation concepts, KYTC and ODOT have also committed to further evaluating reconfiguring 6 th Street in Cincinnati to accommodate two-way traffic. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
B-115	Pryor, Stephan	B-115-1	02/21/2024 - I'm here to talk about the street grid. Well, we in Queensgate area, back in the 50s, the 40s, Kenyon-Barr, when I-75, when it actually came through, the city of Cincinnati actually was rooted in racism by pushing the blacks out of the community of Kenyon-Barr for the I-75 project. One of our council members, Scotty Johnson, did apology for the city. And if I'm not mistaken, Queen City is a business district area with 366 business parcels. It has no community at all. So how can it rely on street grid to come down here? But the city needs to eliminate the fifty-two community because this is not a community. It has no purpose, public purpose of a community down here. No people. It has no council down in the Queensgate. They can restore part of this West End through the Kenyon-Barr by making a black business district down in this area. There is no residents in this approved public purpose	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. During public involvement activities, ODOT received multiple comments suggesting the inclusion of retail areas on the Ezzard Charles Drive bridge over I-75. On August 29, 2023, the City of Cincinnati requested that ODOT investigate decking or an expanded bridge on Ezzard Charles Drive to support future civic space or retail development. Based on further coordination with the City, ODOT has committed to building a wider bridge on Ezzard Charles Drive over I-75. The widened bridge will provide an additional 50 feet of green space on each side that could support potential future civic space or retail	Travel Patterns and Access (4.1.4) Public Comments (5.1.1)



ID	Name	No.	Comment	Response	Reference ¹
			letter that is required on this project to receive government funds. So, if I'm not mistaken, from Kenyon-Barr incident, what happened rooted in racism. This shouldn't have a street grid at all down here. I'm against that because it's not fair. But I like the Ezzard Charles. I like that how y'all have it in the background on y'all map about the Ezzard Charles with business up there that look good doing that. But Queensgate has no residents at all, so that wouldn't look good as a street grid going at all. So, I approve that message. Thank you.	development by the City of Cincinnati. ODOT will fund the cost of the bridge design and will share the construction cost with the City. ODOT and the City will develop cost sharing and maintenance agreements prior to construction. The City of Cincinnati is responsible for future local land use and development decisions in Queensgate and along Ezzard Charles Drive.	
B-116	Shaw, Kevin	B-116-1	02/21/2024 - I'm a city of Cincinnati downtown resident, and just speaking on behalf of myself. I wanted to just talk a little bit about air quality. As a downtown resident, I haven't had a chance to read the whole supplemental report, but I did notice that there is no currently listed in the executive summary of mitigation or enhancement measures for air quality. Specifically, just as a downtown resident, specifically, I think the Brent Spence Bridge and I-71, which I live slightly closer to, already contribute significantly to the air quality in the region. And I think it's noteworthy that asthma rates I know are very, very high within the city and within the city's residents, especially as we want to grow as an agency. And I look forward to looking into that more as I read through the entire document.	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone. KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <u>Quantitative MSAT Analysis Report</u> (August 2023). The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	Disadvantaged Communities (4.1.9) Air Quality (4.6)



ID	Name	No.	Comment	Response	Reference ¹
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. The analyses concluded that emissions of the analyzed pollutants would be substantially reduced for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County.	
				Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant. Given the above, Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area and no mitigation measures for permanent air quality impacts are required.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	



ID	Name	No.	Comment	Response	Reference ¹
				KYTC and ODOT evaluated the effects of Refined Alternative I (Concept I-W) on health burdens in disadvantaged communities in a <u>Socioeconomic</u> <u>Technical Report</u> (January 2024). The analysis concluded that Refined Alternative I (Concept I-W) will not further contribute to health burdens; rather, Refined Alternative I (Concept I-W) may result in potential better health outcomes for those with asthma, diabetes, heart disease, or low life expectancy due to improved access to healthcare destinations, improved options for active transportation, and improved air quality due to improved traffic flow and reduced vehicle idling.	
		B-116-2	02/21/2024 – And just broadly speaking, I think it's notable throughout that emissions that will be created by this project are going to continue to contribute to climate change. It's not just this project, it's a system wide problem, but I think this project is representative of that as a whole. Our city has worked really hard as part of the Green Cincinnati Plan to implement changes that we can do locally. And the one area that is not budging is transportation and mobile sources, or mobility related sources, excuse me. I think it's pretty obvious that we've done a lot as far as reducing that.	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	Greenhouse Gases and Climate Change (4.7)



ID	Name	No.	Comment	Response	Reference ¹
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
		B-116-3	02/21/2024 - But the more and more cars that we add to our community, to our city, to the downtown streets, to this new collector distributor system, are likely to contribute to continuing to shrink the area of downtown that is actually livable, despite the ten acres that are fringe right by the middle of a highway where no one really particularly wants to spend time, generally because of things like air quality and noise that are not appropriately mitigated. Thank you.	Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area and no mitigation measures for permanent air quality impacts are required. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts related to air quality. These include developing and implementing a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor. Temporary air quality effects will also be minimized by following federal, state, and local regulations regarding dust and emission controls.	Air Quality (4.6) Noise - Ohio (4.8.2) Construction Impacts (4.11)
				ODOT evaluated noise for Refined Alternative I (Concept I-W) and documented the results in a <u>Noise</u> <u>Analysis Report</u> (October 2023). The Ohio analysis identified noise impacts at the Firefighters Memorial and an apartment building (31 total noise sensitive receptors) in the Cincinnati downtown area. Noise barriers were evaluated for the Firefighters Memorial and the apartment building but were not found to be feasible and/or reasonable per ODOT's noise policy. Noise impacts were identified for these receptors because the sound levels in both the existing (2029) condition and the proposed (2049) conditions exceed noise abatement criteria established by FHWA. Although noise levels are higher than established noise abatement criteria for both the existing and proposed conditions, Refined Alternative I	



ID	Name	No.	Comment	Response	Reference ¹
				(Concept I-W) will only increase noise levels in the Cincinnati downtown area by a maximum of 1.3 decibels. According to ODOT's noise policy, the average person cannot detect an increase or decrease in sound pressure level of less than 3 decibels. Therefore, while noise mitigation is not proposed in the Cincinnati downtown area, Refined Alternative I (Concept I-W) is not anticipated to create a perceptible increase in noise levels in this area.	
B-117	Lurk, Dylan	B-117-1	02/21/2024 - West Fourth Street resident. But actually, I'm here tonight representing Bridge Forward. So, Bridge Forward is more than just a technically feasible design that your agencies have listened to and commented on and that we've iterated on, but we're also out here advocating for design improvements to attempt to right the wrongs of the past.	As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the Brent Spence Bridge (BSB) Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary (January 2024)</i> . Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. Features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices. These features include reconfiguring the river crossing to use the existing BSB for local traffic as part of the collector-distributor roadway system and a new double-decker companion bridge to the west for through (interstate) traffic. In addition, performance-based design principles have been incorporated into the design of	Purpose and Need (2.) Alternatives (3.) Public Comments (5.1.1)



ID	Name	No.	Comment	Response	Reference ¹
				Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District (CBD).	
		B-117-2	02/21/2024 - There are certainly benefits to our greater metropolitan region. Out of this project, of course, will be the wages and the expenditures during construction. When construction finishes, new businesses will hopefully locate in our region if it's done right, but they'll probably locate at the outskirts of our region with new warehouses, operations centers. That's where the growth seems to be. As a result, we'll see more trucks and we'll also see more cars, people commuting across the tri state area to these employment centers. So, our greater region will benefit.	Refined Alternative I (Concept I-W) is expected to result in net economic and employment benefits, including: minimal effects on revenues from property taxes or property owner income from rental properties; no expected impacts on property values or the attractiveness of rental properties; net benefits to workforce development and employment; and improved infrastructure to support national freight movement. The construction of Refined Alternative I (Concept I-W) is also expected to result in temporary increases in employment due to construction job creation, increased sale of construction supplies, materials, equipment, and fuel from local and regional sources and increased revenue for businesses providing services to construction crews. Traffic projections for Refined Alternative I (Concept I-W) were developed using the Ohio-Kentucky-Indiana Regional Council of Government (OKI) regional travel demand model, which assigns routes used by travelers	Traffic (3.8) Economy and Employment (4.1.6) Temporary Economic and Employment Benefits (4.11.3)
				demand model, which assigns routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected population and employment growth are also incorporated into OKI's regional travel demand model. Traffic operational analyses documented in an <u>Interchange Modification Study Addendum</u> (December	



ID	Name	No.	Comment	Response	Reference ¹
				2023) concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods.	
		B-117-3	02/21/2024 - But what about the neighborhoods that this project runs through right now? It's the same ones that lost out when the interstate was installed many decades ago. The West End ripped apart. Camp Washington lasting effects. Covington lasting effects. Kenyon-Barr gone. Many of these neighborhoods of what still remains today have disproportionately low car ownership. So, it's kind of ironic that we're expanding a piece of infrastructure in these neighborhoods who many residents don't even benefit from the infrastructure being there in the first place.	An <i>Environmental Justice Analysis Report</i> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The analysis concluded that Refined Alternative I (Concept I-W) would not result in adverse effects on pedestrian, bicycle, or transit access and mobility in environmental justice communities. A <u>Socioeconomic Technical Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on several populations and groups, including zero-car households. The analysis concluded that Refined Alternative I (Concept I-W) would have no impacts to pedestrian, bicycle, and transit access and mobility for zero-car households. Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington CBD neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared- use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks. Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday, thus benefitting individuals who utilize these transit routes,	Future Design Refinements (3.7) Travel Patterns and Access (4.1.4) Environmental Justice (4.1.7) Socioeconomic Groups (4.1.8)



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				including zero-car households. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	
				Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts may provide additional benefits to zero-car households, including: improving neighborhood connectivity across the interstate; building the project with a context sensitive design that fits within the community; minimizing physical intrusion and impact; and designing for sustained quality of life.	
		B-117-4	02/21/2024 - So, the Bridge Forward vision seeks to right those wrongs as best as we can, while still keeping the piece of infrastructure in place. We're looking for continued reduced size in the footprint. We're looking for more improvements to reduce the crossing distance across that chasm. We're looking for street grid extension improvements. All of these will help contribute to the urban environment that this project runs through and help to right the wrongs of the past.	Refined Alternative I (Concept I-W) incorporates several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land formerly occupied by the dunnhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge. During the progressive design-build contract, KYTC and ODOT will evaluate innovation concepts to provide additional community benefits. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7)



ID	Name	No.	Comment	Response	Reference ¹
				across the interstate; and building the project with a context sensitive design that fits within the community.	
				When innovations are proposed, KYTC and ODOT will share recommendations with key stakeholders such as the City of Cincinnati and Hamilton County and will gather feedback from local agencies that may be affected by any changes. Each local entity will be responsible for soliciting public feedback on innovations as part of their review and comment process. For example, the City of Cincinnati is assembling an advisory committee to provide project feedback that will include representatives from Hamilton County, the Cincinnati Port Authority, community councils, development corporations, business groups, and other interested groups. KYTC and ODOT will make final decisions about innovation concepts based on technical evaluation and	
				coordination with local agencies.	
		B-117-5	02/21/2024 - So, in closing, I want to thank you for listening and working with us. As far as we've gotten thus far and the improvements that have come about. I implore you to continue to fully adopt the Bridge Forward vision in its entirety.	During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	Future Design Refinements (3.7)
		B-117-6	02/21/2024 - I want to address separate from Bridge Forward, but in my capacity as a resident of downtown, I live on the [REDACTED] block of West Fourth street. It's called Historic West Fourth Street. That's the name of the district. It's historic for a reason. There are many historic buildings in that one or two block area. And looking at the slides and the posters in the back, I haven't seen any adequate mitigation measures for the noise quality impacts. Right here where 71 and 75 interchange. Like I said, it's historic. So, there's	ODOT evaluated noise for Refined Alternative I (Concept I-W) and documented the results in a <u>Noise</u> <u>Analysis Report</u> (October 2023). The Ohio analysis identified noise impacts at an apartment building, which is in the same block of 4 th Street that was referenced by the commenter. Noise barriers were evaluated for the apartment building but were not found to be feasible or reasonable per ODOT's noise policy. Noise impacts were identified for this apartment building because the sound levels in both the existing (2029) condition and the proposed (2049) conditions exceed noise abatement criteria established by FHWA. Although noise levels are higher than established noise abatement criteria for both	Noise - Ohio (4.8.2)



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			many old buildings. The building I live in, very old. Not a day goes by where I don't hear a truck horn honking by with my windows closed. The windows are closed. Every day I have to listen to the sounds of cars rushing by. It's particularly bad when it's raining out because there's a lot more noise with the rushing water and the water running up the tires and all that stuff. So, I would just ask that there be considerations made to the residents who live downtown. It's not just an employment center. It's not just a place where people come from the suburbs to have fun, but people, many thousands of people live downtown. So please make sure that the residents who live downtown are being taken into account as these plans are being finalized. Thank you.	the existing and proposed conditions, Refined Alternative I (Concept I-W) will only increase noise levels in this area by a maximum of 1.3 decibels. According to ODOT's noise policy, the average person cannot detect an increase or decrease in sound pressure level of less than 3 decibels. Therefore, while noise mitigation is not proposed in the area referenced by the commenter, Refined Alternative I (Concept I-W) is not anticipated to create a perceptible increase in noise levels in this area.	
B-118	Riegler, Nick	B-118-1	02/21/2024 - I'm a lifelong resident of Cincinnati out in Cleves, but I have also lived in Newport. I'm incredibly excited for this massive investment to our city and surrounding infrastructure. Opportunities like this do not come often, and we need to take the chance to truly revolutionize this space. The Brent Spence bridge, as anyone can see, is in dire need of replacement. But the idea of increasing traffic lanes is a short sighted strategy.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Refined Alternative I (Concept I-W) will rehabilitate and reconfigure the existing double-decker Brent Spence Bridge (BSB) to carry three lanes of traffic on each deck as part of a new collector-distributor roadway system. A new double-decker companion bridge will be built west of the existing BSB to carry five lanes of through (interstate) traffic on each deck.	Project Description (1.1) Purpose and Need (2.)
		B-118-2	02/21/2024 - When all you have is a hammer, everything looks like a nail. So, I understand that to traffic engineers, expanding roads is a logical choice. But induced demand is real, and it will only exacerbate the problem.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor,	Traffic (3.8)



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				the Ohio <i>Traffic Forecasting Manual</i> , and the Ohio- Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-118-3	02/21/2024 - The reduction of urban freeways is an existential necessity. Not only is it ugly, it's dangerous and a terrible allocation of space. It kills the character of our city.	Refined Alternative I (Concept I-W) incorporates several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land formerly occupied by the dunnhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge. KYTC and ODOT have worked to incorporate several enhancements to further benefit surrounding communities, including aesthetic enhancements,	Alternatives (3.) Neighborhood and Community Cohesion (4.1.2)



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				multimodal facilities, noise reduction measures, and drainage improvements. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit on community cohesion.	
		B-118-4	02/21/2024 - Please reconsider alternative public transit options to reduce traffic flow on the highway. It helps everyone, not just highway users.	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit routes would not meet the project purpose and need and are not considered to be a reasonable alternative for the BSB Corridor Project. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental EA. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access. Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	Purpose and Need (2.) Travel Pattern and Access (4.1.4)
		B-118-5	02/21/2024 - And the city needs more natural foot traffic. Revenue has been so bad in the wake of the pandemic that some of the largest corporate tenants of the city have been forcing	Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. These improvements will increase the options	Travel Patterns and Access (4.1.4)



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			work from home employees to return to the office just so the city can make maximum of their losses. And it's a true shame that more people can't experience the city as a pedestrian with the current options available.	available to pedestrians and bicyclists, which will enhance community connectivity along and across the I-71/I-75 corridor and may improve access to transit, employment, healthcare, cultural, recreational, and commercial destinations. At Pike Street and West 12 th Street/MLK Jr. Boulevard, the project will improve connections to the Lewisburg neighborhood, which was left isolated from greater Covington by the original interstate construction. In Ohio, the bicycle and pedestrian infrastructure will improve connectivity in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will support future planned improvements of regional pedestrian and bicycle networks.	
B-119	Guthrie, Daniel	B-119-1	02/21/2024 - I'm a resident Cincinnati at Kennedy Heights. I'd like to start by saying that I would like to request ODOT and conduct a full environmental impact statement regarding the Brent Spence Corridor Project for the following reasons.	The analysis documented in the supplemental Environmental Assessment (EA) has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in Title 40 of the Code of Federal Regulations (CFR) section 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final National Environmental Policy Act determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	Project Description (1.1)
		B-119-2	02/21/2024 - I think that I'm deeply skeptical that this project will kind of deliver the results that have been promised to ease congestion and improve the flow of traffic for the following reasons. North of the river, there are two major interstates that are emerging, Interstate 75 and 71. I struggle to see how that will never not increase congestion.	significant impact. FHWA will make the final National Environmental Policy Act determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019	Traffic (3.8)



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				traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. OKI's regional travel demand model also includes projected population and employment growth. The <i>Interchange Modification Study Addendum</i> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods.	
		B-119-3	02/21/2024 - And then south of the river with cut-in-the-hill as long as I've lived here, that has also always contributed to congestion and reducing the flow of traffic.	Refined Alternative I (Concept I-W) provides six lanes for northbound and six lanes for southbound interstate traffic in the area known as the "cut-in-the-hill." Traffic operational analyses prepared for Refined Alternative I (Concept I-W) include consideration of roadway grades on various roadway sections. The traffic operational analyses, which are documented in an <u>Interchange</u> <u>Modification Study Addendum</u> , concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations along the area known as the "cut-in-the-hill" for all projected trips in the project area through the year 2049.	Traffic (3.8)
		B-119-4	02/21/2024 - And then also in Louisville, I think that there is a relevant example for us to draw from with the Lincoln Bridge, that the leaders in Kentucky and Indiana built that. Then when they implemented a toll, the projected traffic across the Lincoln Bridge did not meet the projections because of the toll. They learned that the network that they had down there already had additional capacity and alternatives for drivers to use. And I believe that we may be	The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. The BSB Corridor Project does not include tolling. OKI's regional travel demand model, which was used to develop the certified traffic projections for Refined	Funding (1.2.1) Traffic (3.8)



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			making the same mistake with some of the assumptions that we're making with this project. We don't actually know if the network of roads, bridges and highways that the Cincinnati region has alternatives and additional capacity for drivers to use. So, for that reason, I would support implementation of a toll on the Brent Spence bridge before moving forward with this project. Just to better understand that the current network that we have and the infrastructure assets that we've already built, to just understand if we need that additional capacity. Thank you.	Alternative I (Concept I-W), accounts for demand and capacity of the transportation system at a regional level.	
B-120	Wettengel, Wes	B-120-1	02/21/2024 - I'm a lifelong resident of Hamilton County. And I just wanted to say when the first time I saw the Bridge Forward plan, I was like, wow, that is exactly what we should do. I remember before Fort Washington Way got shrunk, how awful it was to cross from the central business district down to the river. Nobody came down there. It was awful. But you see the plan for Bridge Forward and it's like a light bulb going off in your head. It's like, that is what we should do. I know it costs more. I get all that. But Fort Washington Way is 1000 times better than it was before.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. Features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices.	Purpose and Need (2.) Alternatives (3.) Future Design Refinements (3.7) Public Comments (5.1.1)
				Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing Brent Spence Bridge (BSB) for local traffic as part of the collector-distributor roadway system and a new double-decker companion bridge to the west for through (interstate) traffic. In addition, performance-based design principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to	



ID	Name	No.	Comment	Response	Reference ¹
				coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District.	
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary (January 2024)</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	



ID	Name	No.	Comment	Response	Reference ¹
B-121	Leonardi, Benedict	B-121-1	02/21/2024 - Reconnect street grid! Downtown/urban core was, at one time among the most dense & vibrant areas in America! Rents/prop values are high - there is demand for more urban living so	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75.	Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2) Travel Patterns
				Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors.	and Access (4.1.4)
				Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	
				Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge (BSB) Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	
			considered during include: improving interstate; and bui	Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
		B-121-2	02/21/2024 - Return more land to the city (or cities-Covington as well!) People like living in cities, give cities the opportunity to provide more living opportunities.	Based on coordination with the City of Cincinnati, Refined Alternative I (Concept I-W) incorporates minor reconfigurations to the 3 rd Street, 4 th Street, 5 th Street, and 6 th Street ramps in downtown Cincinnati that will open up	Additional Refinements (3.3)



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				approximately 10 acres of land for potential redevelopment and/or public use. Based on further coordination with the City, ODOT has committed to building a wider bridge on Ezzard Charles Drive over I-75. The widened bridge will provide an additional 50 feet of green space on each side that could support potential future civic space or retail development by the City of Cincinnati. ODOT will fund the cost of the bridge design and will share the construction cost with the City. ODOT and the City will develop cost sharing and maintenance agreements prior to construction.	Future Design Refinements (3.7) Public Comments (5.1.1)
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. One of the design-build contract objectives that KYTC and ODOT will consider during the evaluation of innovation concepts is minimizing the footprint of the interstate system to maximize potential developable space.	
		B-121-3	02/21/2024 - Re-evaluate companion bridge – traffic has been falling and we SO NOT need to induce more traffic.	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT, KYTC, and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI). Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for	Traffic (3.8)
				KYTC and ODOT developed design-level no-build and	



ID	Name	No.	Comment	Response	Reference ¹
				the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <i>Interchange Modification Study Addendum</i> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods. Traffic projections prepared during the preparation of the 2012 Environmental Assessment estimated that 197,000 vehicles per day would travel across the existing BS by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	



ID	Name	No.	Comment	Response	Reference ¹
B-122	Minich, Ryan	B-122-1	02/21/2024 - Am I the only one that finds it ironic that this is at least the second ODOT held open house/public engagement session held at Longworth Hall? THE BUILDING is subject to partial demolition for highway expansions. IT is a Federally Designated Historically Significant Building. A B&O Railroad Building, with a twin in Baltimore, both building s are as long as the Empire State building is tall. Well, Cincinnati's won't be for long Baltimore incorporated its B&O rail depot building into the Baltimore Oriels MLB Stadium design for Camden Yards.	Refined Alternative I (Concept I-W) will remove 204 feet of the Longworth Hall building, which is eligible for listing on the National Register of Historic Places. Refined Alternative I (Concept I-W) will have an adverse effect on Longworth Hall in accordance with Title 36 of the Code of Federal Regulations (CFR) section 800.5(a). Impacts will be mitigated by the completion of repair, upgrade, restoration, enhancement, and refurbishment on the portions of the building impacted by construction and the portions of the building to remain. ODOT is in the process of purchasing the full Longworth Hall property from a willing seller. ODOT's potential use of the interior and exterior of the building or affect its continued use or access. The mitigation measures for Longworth Hall were coordinated with consulting parties in Ohio. A Section 106 Programmatic Agreement specifies the mitigation measures for Longworth Hall, which are incorporated into the project's environmental commitments.	History/ Architecture Resources (4.5.2)
		B-122-2	02/21/2024 - Additionally, the expansion – the widening-the doubling or more of lane capacity on either end of the Ohio River is insane. Eventually the highway has to bottleneck down to 3-4 lanes in each direction. So as a corridor project sold as a solution to ease congestion and improve bottleneck conditions – it is destined to fail at either measure. Time will tell, if the proposed expansion gets built, it will worsen congestion and by design increase bottleneck conditions. On either end of the BSB corridor scope, the highway steps down to 5 lanes, then to 4 lanes, and in some areas 3 lanes in each direction.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
				calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
				In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that a highway improvement project was necessary to address capacity issues on I-75, including the BSB Corridor. While the original findings of the Initiative called for four lane continuity in each direction on I-75, traffic analyses completed as part of ODOT's Millcreek Expressway and Thru the Valley projects determined that five lanes were needed south of the I-74/I-75 interchange. This change was approved by OKI, and ODOT has been following these recommendations in work that has been ongoing throughout the I-75 corridor, including the BSB Corridor Project.	



ID	Name	No.	Comment	Response	Reference ¹
		B-122-3	02/21/2024 - Tangentially, as I understand it, all the scope of E-W connections from the Brent Spence Bridge to the Western Hills Viaduct that cross the city from over underpasses of I-75 are existing connections. Why are we only proposing to tear down and rebuild existing connection? Why aren't we examining reconnection past city street connections from before the highway construction severed these streets and split neighborhoods. Queensgate, as we now know it has the greatest potential for new connections to the Central Business District. As I understand it, no new connections across I-75 are proposed in the West End or in Camp Washington.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT are continuing to coordinate local connections with the City of Cincinnati. Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	Purpose and Need (2.) Neighborhood and Community Cohesion (4.1.2)
		B-122-4	02/21/2024 - Why not reconnect 5 th Street between Central & Gest St?	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by the City of Cincinnati and other groups, some of which include extending 5 th Street over I-75 in downtown Cincinnati.	Purpose and Need (2.) Future Design Refinements (3.7)
		B-122-5	02/21/2024 - Why does 7 th Street in CBD connect to 8 th Street in Queensgate? Why not revive the historic 7 th Street connection in Queensgate? 8 th St in Queensgate diverts to other 9 th or 7 th streets in CBD.	Refined Alternative I connects 7 th Street to Gest Street in Queensgate and accommodates 8 th Street eastbound traffic to tie into the one-way pairs in the Cincinnati Central Business District. 7 th Street connects to 8 th Street in Queensgate under the existing conditions, and Refined Alternative I (Concept I-W) maintains this connection. The	Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				configuration of 8 th Street is necessary to accommodate the existing one-way pairs in the Cincinnati Central Business District.	
		B-122-6	02/21/2024 - Why not connect Court Street in the West End to "Gest" St in what is now Queensgate?	A roadway connection is not planned at this location due to the geometry of the roadway and topography of the site. Vehicular traffic can use Linn Street, 8 th Street and Freeman Avenue to connect to Gest Street, a distance of about 0.50 miles. Refined Alternative I (Concept I-W) also includes a new pedestrian bridge to connect West Court Street to Freeman Avenue, which provides direct pedestrian access to Gest Street.	Travel Patterns and Access (4.1.4)
		B-122-7	02/21/2024 - Why not reconnect York Street on either end of the West End and what is now Queensgate?	Refined Alternative I (Concept I-W) provides an alternate route via Findlay Street that is 0.3 miles longer than the new connection suggested by the commenter and is compliant with the requirements of the Americans with Disabilities Act. Connecting York Street across I-75 would also require an additional business relocation in the West End neighborhood.	Travel Patterns and Access (4.1.4)
		B-122-8	02/21/2024 - Why not reconnect Colerain Ave in Camp Washington to the West end?	The abutments for the new Western Hills Viaduct bridge present a large obstruction that would preclude reconnecting Colerain Avenue across I-75.	Travel Patterns and Access (4.1.4)
		B-122-9	02/21/2024 - Why not connect Straight St in Camp Washington to Straight Street in CUF? Why not reconnect Bates Ave on either side of I-75 which is a severed street connection on Camp Washington that connected to Central Pkwy.	The areas described by the commenter are outside of the limits and project area of the BSB Corridor Project.	Travel Patterns and Access (4.1.4)
		B-122-10	02/21/2024 - Because this is a highway expansion project when it should be a highway reduction project focused on reconnection city neighborhoods.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors.	Purpose and Need (2.) Neighborhood and Community



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				KYTC and ODOT have worked to incorporate several enhancements to further benefit surrounding communities, the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit on community cohesion.	Cohesion (4.1.2)
		B-122-11	02/21/2024 - Take the Fort Washington Way design approach to the Ohio side of the highway interchanges in Queensgate the Central Business District and the West End.	KYTC and ODOT have evaluated depressing I-75 and extending local streets across the highway to form an urban street grid similar to Fort Washington Way in Cincinnati, which is documented in the <u>Public Involvement</u> <u>Summary</u> (January 2024). These concepts would not be geometrically feasible and would result in a greater project footprint than Refined Alternative I (Concept I-W). Furthermore, these concepts would not maintain continuity along US-50, would increase traffic on the local street network in the City of Cincinnati, and would not provide additional options for maintaining cross-river traffic if an incident or future construction or maintenance activities occur on the BSB and therefore do not meet the project purpose and need.	Public Comment Outcomes (5.1.2)
		B-122-12	02/21/2024 - Do the design that Bridge Forward proposed. Reconnect the city to its historic street grid by providing highway over & under passes across I-75 in the 3-4 effected neighborhoods that his corridor improvement project scope encompasses. Thank You	Refined Alternative I (Concept I-W) meets the project purpose and need and maintains or improves existing local connections. In addition, features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward. These include minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices. Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing BSB for local traffic as part of the collector-distributor roadway system and a new double- decker companion bridge to the west for through (interstate) traffic. In addition, performance-based design	Purpose and Need (2.) Alternatives (3.) Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2) Public Comments (5.1.1)



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				principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District.	
				Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss	



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				their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
B-123	Secker, Mary	B-123-1	02/22/2024 - We are an OH certified DBE. How do we get pre-qualified for work over \$1M?	Information about prequalification requirements for both KYTC and ODOT are available on the project website: <u>https://brentspencebridgecorridor.com/work-with-us/construction-contractor-resources/</u> .	
B-124	Maley, Brandon	B-124-1	02/22/2024 - My company owns a property affected by the bridge project. Who can I speak with regarding the property easement? The area impacted by this project has power, water, and fiber optic connectivity overhead and/or underground.	ODOT has already acquired most of the property needed to build the project, and all impacted property owners have been contacted. Based on the contact information provided, the commenter owns property impacted by the project in Ohio. ODOT will coordinate utility relocation requirements with this property owner during the detailed design phase of the project. Questions about right-of-way acquisition can be directed to the ODOT Brent Spence Bridge Corridor Project Manager: <u>Tom.Arnold@dot.ohio.gov</u> .	Land Use (4.1.1) Utilities (4.12.1)
B-125	Plaskett, Eli	B-125-1	02/22/224 - Given the overwhelming recent scientific consensus that adding lanes of traffic does not reduce congestion - and can in fact increase congestion - what purpose does this bridge project actually serve?	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors.	Purpose and Need (2.) Traffic (3.8)
				KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel	



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				demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model.	
				Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-125-2	02/22/2024 - This will destroy over two dozen homes and businesses,	Refined Alternative I (Concept I-W) requires 4 residential, 1 partial commercial, and 24 full commercial (including 14 tenants in one structure) relocations. In addition, ODOT is in the process of purchasing the full Longworth Hall property at a mutually agreed upon price and from a willing seller as a result of the right-of-way negotiation process. The building will remain occupied, and only businesses directly impacted by the removal of 204 feet from the building's east end will be relocated. ODOT may use interior space or the exterior grounds surrounding the building during the project's construction, but no impacts	Relocations (4.1.5)



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				to the building's continued use for commercial office, retail, and event space are anticipated.	
				The acquisition of property for right-of-way (including residential and business relocations) has been, and will continue to be, in accordance with the Uniform Act, which provides relocation services to impacted property owners and tenants. The majority of the Ohio businesses have already been relocated and removed under the 2012 Environmental Assessment (EA) and Finding of No Significant Impact (FONSI). Ongoing acquisition activities in Kentucky and Ohio have indicated that affected businesses will be able to relocate within the same geographic area if so desired, either in existing structures or new construction.	
				None of the commercial relocations is expected to result in substantial job loss or economic impact, nor are they known to be substantial employers or serve unique needs within the surrounding communities. In addition, avoidance and minimization measures incorporated into Refined Alternative I (Concept I-W) have reduced residential and commercial relocations to the greatest extent practicable. Therefore, Refined Alternative I (Concept I-W) is only expected to result in minor impacts due to residential and commercial relocations.	
		B-125-3	02/22/2024 - increase traffic congestion, and	An Interchange Modification Study Addendum prepared	Traffic (3.8)
			worsen our already terrible air quality,	for the project concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods.	Air Quality (4.6)
				Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	



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				In addition, KYTC and ODOT prepared quantitative mobile source air toxics (MSAT) and emissions burdens analyses for the 2020 existing, 2050 no-build, and 2050 build scenarios. The analyses used the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emissions Simulator (MOVES) and travel demand models for the project's approved certified traffic. MOVES is USEPA's official model for state implementation plans and transportation conformity analyses and the emissions model used for the quantitative MSAT emissions analyses.	
				The <u>Quantitative MSAT Analysis Report</u> (August 2023) concluded that the emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no- build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no-build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no- build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no-build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				The emissions burdens analysis concluded that emissions of volatile organic compounds, nitrogen oxides, and PM2.5 would be substantially reduced for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. Consistent with USEPA's analysis methodology, these reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios	



ID	Name	No.	Comment	Response	Reference ¹
				are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant. Given the above, Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area. Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-125-4	02/22/2024 - and we're expected to pay over \$3 billion	The total project cost estimate is \$3.6 billion, which includes all costs required to deliver the project, including but not limited to planning, design, property acquisition, construction, construction management services, and agency labor. The cost of the companion bridge and the rehabilitation of the existing BSB will be split 50/50 between Kentucky and Ohio, and each state will pay for the approach work on their respective ends of the bridge. In December 2022, KYTC and ODOT received \$1.635 billion in federal funding grants under programs created by the Bipartisan Infrastructure Law. The Kentucky General Assembly passed, and Governor Beshear signed, a budget bill that included funding to fulfill state match requirements for large projects. Ohio's legislature approved the State Transportation Budget that allows	Funding (1.2.1) Cost Estimates (3.6)



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				ODOT to use a combination of other federal funding and state funding from the motor fuel tax and bonding.	
		B-125-5	02/22/2024 - and endure a decade of construction traffic for the privilege of suffering this diminished quality of life. https://www.nytimes.com/2023/01/06/us/widen- highways-traffic.html	Refined Alternative I (Concept I-W) is expected to result in temporary impacts for all transportation modes due to increased traffic on local roads, access restrictions, and detours. It is also expected to result in temporary utility impacts, air quality effects, noise increases, and erosion and sediment increases. Temporary economic and employment benefits are expected due to construction job creation and increased sale of construction-related supplies and services. Temporary construction impacts will be minimized and mitigated to the greatest extent practicable through the development of traffic management, maintenance of traffic, and incident management plans; coordination with local cities, transit agencies, and the regional incident management task force; notifications/outreach to public and trucking companies; and implementation of a dust control plan, measures to monitor and protect air quality, manage construction noise, and best management practices for erosion and sediment control.	Construction Impacts (4.11)
		B-125-6	02/22/2024 - I'm a citizen of Cincinnati. I'm calling mostly to express my confusion with this because I've seen as multiple news agencies have covered multiple scientific journals, have explored increasing lanes of traffic, does not reduce traffic congestion on highways. It tends to make traffic congestion worse.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals,	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
				households, number of lanes, projected trips, and calculated travel times.	
				Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-125-7	02/22/2024 - So, it seems like we're promising eight years of construction.	Construction on Phase III of the BSB Corridor Project (Dixie Highway in Kentucky to Linn Street in Ohio) is expected to begin in 2025 and be substantially complete by 2030. Construction on Phase II (Linn Street to Findlay Street in Ohio) is expected to begin in 2026 with completion in 2031. Construction of Phase I (Findlay Street to Marshall Avenue in Ohio) is expected to begin in 2029 and be completed in 2032. The construction timeframes are typical for large, complex urban interstate widening projects and for the construction of a new double decker companion bridge spanning the Ohio River.	Project Description (1.1) Construction Impacts (4.11)
				Refined Alternative I (Concept I-W) is expected to result in temporary impacts for all transportation modes due to increased traffic on local roads, access restrictions, and detours. It is also expected to result in temporary utility impacts, air quality effects, noise increases, and erosion and sediment increases. Temporary economic and employment benefits are expected due to construction job	



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				creation and increased sale of construction-related supplies and services.	
				Temporary construction impacts will be minimized and mitigated to the greatest extent practicable through the development of traffic management, maintenance of traffic, and incident management plans; coordination with local cities, transit agencies, and the regional incident management task force; notifications/outreach to public and trucking companies; and implementation of a dust control plan, measures to monitor and protect air quality, manage construction noise, and best management practices for erosion and sediment control.	
		B-125-8	02/22/2024 - We're taking out basketball courts and parks	Refined Alternative I (Concept I-W) will not remove any parks. Two public parks will be permanently impacted by Refined Alternative I (Concept I-W): the Goebel Park Complex in Kentucky and the Queensgate Playground and Ball Field in Ohio. Refined Alternative I (Concept I-W) will acquire 2.84 acres of permanent right-of-way, including 360 feet of walking trails, two basketball courts, and associated resources from the Goebel Park Complex. Impacts will be mitigated through the provision of replacement land; reconstruction of the walking trail within the complex; and a financial commitment from KYTC for the development of a new Goebel Park Complex Master Plan, replacement and enhancement of the basketball courts or other outdoor recreation facilities within the park, and a relocated outdoor pool and associated facilities or other comparable aquatic facility serving the same purpose within the park. Noise/visual screening barriers are also proposed to provide enhanced sound reduction in the complex. In addition, the separation of interstate runoff from the combined sewer overflows in the complex.	Goebel Park Complex (4.13.3) Queensgate Playground an Ball Field (4.13.7)



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				areas for the ball fields that existed at that time. Trees and shrubs along the southern edge of the park will also be removed during the construction of the highway, retaining wall, and a proposed noise barrier. Impacts were mitigated by compensating the City of Cincinnati for the land, relocation of recreational facilities, preparation of construction plans for the ball field reconfiguration, and construction monitoring of the mitigation. A noise barrier is also proposed to mitigate noise impacts. If noise public involvement concludes that a noise barrier will not be built, then ODOT has committed to installing limited access right-of-way fencing along the park and highway boundary.	
		B-125-9	02/22/2024 - and destroying community cohesion in largely black neighborhoods.	 KYTC and ODOT have worked to incorporate several enhancements to provide additional benefits to surrounding communities. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements. An <i>Environmental Justice Analysis Report (January 2024)</i> was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on environmental justice populations: 	Neighborhood and Community Cohesion (4.1.2) Environmental Justice (4.1.7)
				 No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; 	
				- No adverse indirect and cumulative effects;	
				 No disproportionately high and adverse relocation, noise, or temporary construction effects; and 	
				 Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle 	

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				emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood.	
		B-125-10	02/22/2024 - And the only thing Cincinnati and Northern Kentucky are going to get out of it are increased pollution, worse traffic, and you know, poorer air quality.	An <u>Interchange Modification Study Addendum</u> prepared for the project concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods.	Traffic (3.8) Air Quality (4.6)
				Air quality evaluations of Refined Alternative I (Concept I-W) considered PM2.5, carbon monoxide, and ozone. The project area is in attainment with NAAQS for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	
				In addition, KYTC and ODOT prepared quantitative MSAT and emissions burdens analyses for the 2020 existing, 2050 no-build, and 2050 build scenarios. The analyses used USEPA's MOVES and travel demand models for the project's approved certified traffic. MOVES is USEPA's official model for state implementation plans and transportation conformity analyses and the emissions model used for the quantitative MSAT emissions analyses.	
				The <u>Quantitative MSAT Analysis Report</u> (August 2023) concluded that the emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no- build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no-build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no- build. Since the future scenarios are anticipated to have a	
				substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no-build scenarios is not considered	



ID	Name	No.	Comment	Response	Reference ¹
				to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				The emissions burdens analysis concluded that emissions of volatile organic compounds, nitrogen oxides, and PM2.5 would be substantially reduced for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. Consistent with USEPA's analysis methodology, these reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant. Given the above, Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	



ID	Name	No.	Comment	Response	Reference ¹
		B-125-11	02/22/2024 - This seems like an absolutely mad project with no purpose and you know, that's my only comment.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors.	Purpose and Need (2.)
B-126	V., Rachel	B-126-1	02/22/2024 - Instead of the connection- distributor systems for local traffic, has expansion of public transit been considered? I'd love to see ways to reduce traffic by limiting reliance on cars	In 2004, the Ohio-Indiana-Kentucky Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation</u> <u>Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit routes would not meet the project purpose and need and are not considered to be a reasonable alternative for the Brent Spence Bridge (BSB) Corridor Project. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	Purpose and Need (2.) Travel Patterns and Access (4.1.4)
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	



ID	Name	No.	Comment	Response	Reference ¹
		B-126-2	02/22/2024 - Historically, road way construction has affected people of color and minor communities. Has this been considered for this project?	An <u>Environmental Justice Analysis Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on environmental justice populations:	Environmental Justice (4.1.7)
				 No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; 	
				- No adverse indirect and cumulative effects;	
				 No disproportionately high and adverse relocation, noise, or temporary construction effects; and 	
				- Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood.	
		B-126-3	02/22/2024 - I'm disappointed that Goebel park complex will lose land to this project. People deserves green space within in walking distance to the city	Refined Alternative I (Concept I-W) will acquire 2.84 acres of permanent right-of-way, including 360 feet of walking trails, two basketball courts, and associated resources from the Goebel Park Complex. Impacts will be mitigated through the provision of replacement land; reconstruction of the walking trail within the complex; and a financial commitment from KYTC for the development of a new Goebel Park Complex Master Plan, replacement and enhancement of the basketball courts or other outdoor recreation facilities within the park, and a relocated outdoor pool and associated facilities or other comparable aquatic facility serving the same purpose within the park. Noise/visual screening barriers are also proposed to provide enhanced sound reduction in the complex. In addition, the separation of interstate runoff from the	Goebel Park Complex (4.13.3)



ID	Name	No.	Comment	Response	Reference ¹
				combined sewer system will reduce flooding and combined sewer overflows in the complex.	
		B-126-4	02/22/2024 - It doesn't seem like the mitigations for the endangered bat species will actually do anything to mitigate habitat loss.	The removal of up to 90 acres of forested habitat will result in the loss of potential foraging or maternity areas for the Indiana bat, the northern long-eared bat, and the tricolored bat. The removal of up to 4.38 acres of riparian habitat will result in the loss of potential foraging areas for the gray bat. Measures incorporated into the project to minimize and mitigate impacts to threatened or endangered bat species will also minimize and mitigate impacts to terrestrial habitat. These include minimizing tree removal and mitigating habitat loss in Kentucky through a contribution to the Imperiled Bat Conservation Fund. The Imperiled Bat Conservation Fund will offset project-related impacts to terrestrial habitats by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts.	Terrestrial Habitat (4.2.3)
		B-126-5	02/22/2024 - Is there no mitigations for the impact of YEARS of destruction/construction??	Refined Alternative I (Concept I-W) is expected to result in temporary impacts for all transportation modes due to increased traffic on local roads, access restrictions, and detours. It is also expected to result in temporary utility impacts, air quality effects, noise increases, and erosion and sediment increases. Temporary economic and employment benefits are expected due to construction job creation and increased sale of construction-related supplies and services. Temporary construction impacts will be minimized and mitigated to the greatest extent practicable through the development of traffic management, maintenance of traffic, and incident management plans; coordination with local cities, transit agencies, and the regional incident management task force; notifications/outreach to public and trucking companies; and implementation of a dust control plan, measures to monitor and protect air quality, manage construction noise, and best management practices for erosion and sediment control.	Construction Impacts (4.11)



ID	Name	No.	Comment	Response	Reference ¹
B-127	Jess	B-127-1	02/22/2024 - Why are there no proposed noise barriers on the West side of the highway in Cincinnati? Thank you for your time and allowing for public comment!	ODOT evaluated noise for Refined Alternative I (Concept I-W) and documented the results in a <u>Noise Analysis</u> <u>Report</u> (October 2023). The Ohio analysis identified noise impacts at three isolated residences on the west side of I-75 in Cincinnati; however, the impacted residences are spaced over a distance of about 2,000 feet. Noise mitigation for isolated residences is not cost effective per ODOT's noise policy, and noise mitigation is not proposed for these residences. The Ohio analysis also identified noise impacts at the Cincinnati Job Corps, which is also west of I-75 in Cincinnati. Noise barriers were evaluated for the Cincinnati Job Corps but were not found to be cost effective per ODOT's noise policy; therefore, noise mitigation is not proposed in this location.	Noise - Ohio (4.8.2)
B-128	Butler, Matt	B-128-1	02/22/2024 - This is Matt Butler with the Devou Good Foundation. About a year ago, the Environmental Protection Agency on February 15 th 2023, raised a number of serious concerns over a preliminary draft of the supplemental environmental assessment. While the supplemental environmental assessment addresses some of these issues, it totally misses the mark on some, and it is incomplete, insufficient, or [audio is unclear] misleading as to others.	The U.S. Environmental Protection Agency (USEPA) is a federal cooperating agency for the Brent Spence Bridge (BSB) Corridor Project. FHWA held regular coordination meetings for federal participating and cooperating agencies throughout the development of the supplemental Environmental Assessment (EA). Cooperating agencies were afforded the opportunity to review and provide comments on multiple drafts of the supplemental EA. FHWA has addressed all comments received from federal cooperating agencies. All cooperating and participating agencies have been notified of the opportunity to offer feedback on the supplemental EA during the public availability period, and individual responses will be prepared for any comments received from participating and cooperating agencies.	Participating & Cooperating Agencies (5.4)
		B-128-2	02/22/2024 - It cannot support a finding of no significant impacts, FONSI. Reasonable alternatives were not considered. A number of important impacts were not considered at all. Others were inadequately considered, and some of the impacts of the project that were identified are not to be mitigated. As a result, an EIS must be prepared.	The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in Title 40 of the Code of Federal Regulations (CFR) section 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final National	Introduction (1.)



ID	Name	No.	Comment	Response	Reference ¹
				Environmental Policy Act (NEPA) determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	
		B-128-3	02/22/2024 - ODOT is obligated to take affirmative action to mitigate prior discriminatory harms, the SEA earnestly discounts the project's harms to nearby minority residents. Census data documents the racial segregation, the EPAs EJA screening tool documents already existing harms.	An <u>Environmental Justice Analysis Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on environmental justice (EJ) populations:	Environmental Justice (4.1.7) Cumulative Effects (4.10.2)
				 No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; 	
				- No adverse indirect effects;	
				 No disproportionately high and adverse relocation, noise, or temporary construction effects; and 	
				- Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood.	
				Refined Alternative I (Concept I-W) was evaluated for cumulative effects specific to EJ populations. Refined Alternative I (Concept I-W) will result in a minor contribution to cumulative residential and commercial displacements and a cumulative loss of parkland and historic resources in these communities. These minor cumulative effects will be experienced by all populations and communities, including EJ populations and non-EJ populations.	
				Cincinnati's West End, now partitioned into the Queensgate and West End neighborhoods, is an area	



ID	Name	No.	Comment	Response	Reference ¹
				with known EJ populations that was historically impacted by urban renewal plans that were common in the United States in the mid-twentieth century. Refined Alternative I (Concept I-W) requires one commercial relocation (a small printing shop) in the West End neighborhood. In addition, the footprint of Refined Alternative I (Concept I-W) has been reduced and requires only minor amounts of strip right-of-way in the West End neighborhood.	
				Refined Alternative I (Concept I-W) will not add to or exacerbate any adverse effects in the West End community from prior actions or events. In recognition of the history of City-sponsored urban renewal and the original Mill Creek Expressway (I-75) construction and as an enhancement in the West End neighborhood, ODOT will work with the City of Cincinnati, which includes the West End Community Council, to develop content for an interpretive display describing the West End community in relation to historic City urban renewal and the Millcreek Expressway construction and to identify a location in proximity to the I-75 corridor to install the display.	
				Refined Alternative I (Concept I-W) will improve community cohesion; improve traffic flow and safety for all modes of travel; improve air quality; abate noise; reduce flooding and combined sewer overflows; improve aesthetics; and provide additional economic opportunities, which will help to offset any cumulative effects from past, present, and reasonably foreseeable actions. Therefore, no adverse cumulative effects on EJ populations are expected to occur as a result of Refined Alternative I (Concept I-W).	
		B-128-4	02/22/2024 - Failure to include a reasonable alter alternative, which included investments in an expansion of public transit as a means of reducing the amount of highway expansion.	In 2004, the Ohio-Indiana-Kentucky Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation</u> <u>Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative	Purpose and Need (2.) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit routes would not meet the project purpose and need and are not considered to be a reasonable alternative for the BSB Corridor Project.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental EA. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access. Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing	
				congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-128-5	02/22/2024 - The SEA inadequately addresses air pollution impacts of the project. EPA has issued more stringent air quality standards for particulate pollution in order to protect the public health.	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	Air Quality (4.6)
				KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <u>Quantitative MSAT Analysis Report</u> (August 2023). The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario.	



ID	Name	No.	Comment	Response	Reference ¹
				Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build.	
				Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no-build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction.	



ID	Name	No.	Comment	Response	Reference ¹
				Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-128-6	02/22/2024 - The noise impacts.	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results in a <u>Traffic</u> <u>Noise Impact Analysis: Brent Spence Bridge Corridor</u> <u>Project Kentucky – Northern Section</u> (August 2023) and a <u>Traffic Noise Assessment: Brent Spence Bridge Corridor</u> <u>Project Kentucky Southern Section</u> (August 2023). The studies found seven noise barriers to be feasible and reasonable per KYTC's Noise Analysis and Abatement Policy (KYTC noise policy), and KYTC is proposing noise barriers to mitigate noise impacts in these areas.	Noise (4.8)
				Recognizing from neighborhood outreach efforts that traffic noise is a primary concern of area residents, KYTC conducted technical studies to evaluate additional noise/visual screening barriers where noise impacts were predicted but noise barriers were not warranted. The results of those studies are documented in a <u>Technical</u> <u>Memorandum: Additional Traffic Noise Assessment</u> <u>Kentucky Southern Section (February 2023)</u> and a <u>Noise</u> <u>Analysis Technical Memorandum Kentucky – Northern</u> <u>Section (November 2022)</u> . Based on the technical feasibility and public comments received during outreach activities, KYTC is proposing two additional noise/visual screening barriers.	
				In accordance with the KYTC <i>Noise Analysis and</i> <i>Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from proposed noise barriers and	



ID	Name	No.	Comment	Response	Reference ¹
				noise/visual screening barriers during the detailed design phase of the BSB Corridor Project.	
				ODOT evaluated noise for Refined Alternative I (Concept I-W) and documented the results in a <u>Noise</u> <u>Analysis Report</u> (October 2023). The study found five noise barriers to be feasible and reasonable per ODOT's <u>Analysis and Abatement of Highway Traffic Noise Policy</u> <u>Statement</u> (ODOT noise policy), and ODOT is proposing noise barriers to mitigate noise impacts in these areas. In addition, ODOT has committed to constructing 57-inch barriers on the Liberty Street, Findlay Street, and Bank Street bridge parapets. These barriers will be 15 inches taller than standard ODOT bridge barriers, and the increased height will further reduce tire pavement noise. In accordance with the ODOT <u>Analysis and Abatement of Highway Traffic Noise Policy Statement</u> , ODOT will conduct noise abatement public involvement with property owners and tenants who would benefit from proposed noise barriers in Ohio during the detailed design phases of the project.	
				Construction noise is expected to generate temporary noise impacts on adjacent and nearby properties, particularly those in residential land use. During construction, the project team has committed to incorporating proactive and reactive measures to address construction noise. This will be accomplished through equipment selection and maintenance, potential screening/shielding/barriers, scheduling of work, education of staff, and the development and implementation of the project's communication plan.	
		B-128-7	02/22/2024 - The SEA fails to adequately address greenhouse gas emissions and climate change;	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using USEPA's MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. The analysis	Greenhouse Gases and Climate Change (4.7)



ID	Name	No.	Comment	Response	Reference ¹
				concluded that greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
		B-128-8	02/22/2024 - failure to reasonably assess induced travel demand;	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8)
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making	



ID	Name	No.	Comment	Response	Reference ¹
				from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-128-9	02/22/2024 - and the failure to consider tolling to reduce congestion and eliminate or reduce the need for adding lanes. That is all. Thank you.	The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. The BSB Corridor Project does not include tolling.	Funding (1.2.1)
		B-128-10	02/22/2024 - The Federal Highway Administration determined back in August of 2012 that the then preferred alternative would have no significant impact on the human or natural environment. Almost a dozen years have passed since then, and much has changed over that time.	The supplemental EA has been prepared consistent with 23 CFR §§ 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional NEPA reevaluation and coordination efforts that have occurred since the 2012 EA/FONSI. The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	Introduction (1.)
		B-128-11	02/22/2024 - The projected increases in traffic volumes that were used then to justify the need for adding a new 10 lane bridge across the Ohio River have not occurred. The combination of the covid epidemic and the widespread adoption of video technology for working virtually has reduced commuting traffic volumes.	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT, KYTC, and OKI. Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019.	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
				KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record.	
				The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange Modification Study Addendum</u> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
				Traffic projections prepared during the preparation of the 2012 EA estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in	



ID	Name	No.	Comment	Response	Reference ¹
				the corridor and lower expected rates of population and employment growth in the OKI region.	
		B-128-12	02/22/2024 - Scientific knowledge and understanding of the impacts of greenhouse gas emissions has advanced, as has recognition of the need to reduce such emissions in order to limit the magnitude of the enormous risks and harms resulting from climate change.	The evaluation of greenhouse gases and climate change prepared for the supplemental EA followed the guidance issued by the Council on Environmental Quality using methodologies discussed and in consultation with USEPA. The analysis was conducted at a quantitatively high level using USEPA's MOVES, which is USEPA's official model for state implementation plans and transportation conformity analyses and is listed by the U.S. Department of Transportation as the most common approach for modeling greenhouse gas emissions for transportation projects.	Greenhouse Gases and Climate Change (4.7)
		B-128-13	02/22/2024 - Federal policies to address racial and ethnic inequity and disparities, including environmental injustice have been strengthened.	Additional targeted EJ outreach was conducted between 2022 and 2023. In addition, an <i>Environmental Justice Analysis Report</i> was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (EJ) populations. The EJ analysis was conducted in accordance with all applicable federal and state guidelines. Where differences in methodology occurred, the most conservative and inclusive approach was followed.	Environmental Justice (4.1.7)
		B-128-14	02/22/2024 - Moreover, the current preferred alternative has changed in numerous ways from what was evaluated in 2012. As a result, an EIS must be prepared.	The supplemental EA has been prepared consistent with 23 CFR §§ 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional NEPA reevaluation and coordination efforts that have occurred since the 2012 EA/FONSI. The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. Detailed descriptions of the	Introduction (1.) Development of Refinement Concepts (3.2) Additional Refinements (3.3) Project Refinements (Appendix A)



ID	Name	No.	Comment	Response	Reference ¹
				refinements incorporated into the project since the 2012 EA/FONSI are provided in the supplemental EA, and further supporting documentation is provided in its appendices.	
				The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a FONSI. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	
		B-128-15	02/22/2024 - Wildly inaccurate traffic projections are being used to justify a boondoggle project that only exacerbates the harms that were inflicted on minority communities. When the interstate was first constructed, daily automobile traffic grew from about 160,000 in 2005 to almost 180,000 in	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT, KYTC, and OKI. Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019.	Traffic (3.8) Environmental Justice (4.1.7)
			2014. Then dropped to about 135,000 in 2015, recovered to about 160,000 by 2017, and then declined again to about 150,000 in 2021 and 2022 for a net decrease of about 6% over 17 years. That is all. Thank you.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record.	
				The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange Modification Study Addendum</u> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals,	



ID	Name	No.	Comment	Response	Reference ¹
				households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
				Traffic projections prepared during the preparation of the 2012 EA estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	
				An <u>Environmental Justice Analysis Report</u> was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (EJ) populations. The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on EJ populations:	
				 No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; 	
				- No adverse indirect and cumulative effects;	



ID	Name	No.	Comment	Response	Reference ¹
ID	Name	No.	O2/22/2024 - The SEA fails to adequately address greenhouse gas emissions and climate change. The SEA fails to even mention the greenhouse gas emissions from construction. It is resulting from producing and transporting the concrete steel, asphalt and other materials to the site, fueling the heavy equipment used to demolish existing infrastructure and to construct the billions of dollars of new infrastructure, operating lighting for night construction, and the like. Those emissions will be front loaded occurring during the first four to six years, and those emissions will remain in the atmosphere as long as a century and will continue to cause additional warming year after year, adding to the resulting climate change impacts.	 No disproportionately high and adverse relocation, noise, or temporary construction effects; and Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood. The evaluation of greenhouse gases and climate change prepared for the supplemental EA followed the guidance issued by the Council on Environmental Quality using methodologies discussed and in consultation with USEPA. The analysis was conducted at a quantitatively high level using USEPA's MOVES, which is USEPA's official model for state implementation plans and transportation conformity analyses and is listed by the U.S. Department of Transportation as the most common approach for modeling greenhouse gas emissions for transportation projects. KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions are expected to 	Reference ¹ Greenhouse Gases and Climate Change (4.7) Construction Impacts (4.11)
				decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in	

ID	Name	No.	Comment	Response	Reference ¹
				greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				In addition, roadway construction can contribute to the total greenhouse gas footprint of on-road transportation, including emissions from extraction, transportation, and production of roadway construction materials, and emissions from fuel used onsite from construction equipment and vehicles. Construction emissions can also include greenhouse gas emissions from roadway resurfacing and reconstruction, routine maintenance, and traffic delay resulting from construction activity.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary air quality impacts during construction.	
				Avoidance, minimization, and mitigation measures incorporated into the project's environmental commitments will help to address greenhouse gas emissions during construction. These measures include developing detailed traffic management, maintenance of traffic, and incident management plans to minimize traffic congestion; requiring ultra-low sulfur diesel fuel for all diesel-powered construction equipment; prohibiting the burning of any materials on the construction site; minimizing idling time for diesel-powered equipment to the greatest extent practicable; and using solar power for digital signs to the greatest extent possible.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the	



ID	Name	No.	Comment	Response	Reference ¹
				project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
		B-128-17	02/22/2024 - With respect to greenhouse gas emissions from use of the expanded highway corridor, the SEA's failure to adequately account for the induced travel that will result from the expanded highways renders it as its estimates unreliably low. The reductions over time in the agency's projected emissions result from factors entirely independent of this project, federal fuel efficiency and exhaust emission standards and gradual replacement of current vehicles by newer vehicles with lower emissions. However, they project dramatically higher volumes of traffic in the future in this corridor than currently exist, an increase in daily traffic volume by 50% by 2035 from volumes in 2017 to 2021, and admit that the preferred alternative will result in 1.7% more traffic than the no-build scenario.	Traffic projections for the BSB Corridor Project were updated during the preparation of the supplemental EA. The comment appears to potentially reference traffic from prior studies. The evaluation of greenhouse gases and climate change prepared for the supplemental EA followed the guidance issued by the Council on Environmental Quality using methodologies discussed and in consultation with USEPA. The analysis was conducted at a quantitatively high level using USEPA's MOVES, which is USEPA's official model for state implementation plans and transportation conformity analyses and is listed by the U.S. Department of Transportation as the most common approach for modeling greenhouse gas emissions for transportation projects. The greenhouse gas emissions analysis was conducted using travel demand models for the project's approved certified traffic. Consistent with USEPA's analysis methodology, greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition. This is primarily due to a 1.7 percent increase in total vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). The analysis concluded that greenhouse gas emissions resulting from Refined	Traffic (3.8) Greenhouse Gases and Climate Change (4.7)



ID	Name	No.	Comment	Response	Reference ¹
				Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record.	
				The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The Interchange Modification Study Addendum concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-128-18	02/22/2024 - Moreover, the impacts of climate change are not limited only to those living in the immediate vicinity of the emission sources and	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in a three-county area (Campbell, Kenton, and Hamilton	Environmental Justice (4.1.7)



ID	Name	No.	Comment	Response	Reference ¹
			climate change has been recognized by both state and federal governments. It's disproportionately impacting low income and minority communities.	 counties) that extends beyond the communities in the immediate vicinity of the project. The analysis concluded that greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change. Based on the greenhouse gas emissions analysis completed for the project, Refined Alternative I (Concept I-W) is expected to have minimal effects on climate change in the study area and the region. 	Greenhouse Gases and Climate Change (4.7)
		B-128-19	02/22/2024 - For those reasons, we need to request an EIS, and that is all. Thank you.	The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	Introduction (1.)
		B-128-20	02/22/2024 - The US EPA Justice screening tool ranks census blocks and tracks by percentile compared to either the nation or the state in which they're located with EJ indexes for exposure to air pollutants such as PM2.5, ozone, diesel particular matter, air toxics, cancer risk, air toxics respiratory health, and by socioeconomic indexes for people of color, low income and health disparities such as asthma. The census area is adjacent to or almost adjacent to the project ward, or with higher proportions of minority residents repeatedly are identified by the EPA as in the 99 th to 100th percentile, or the 90th to 95 th percentile ranking of these indexes. The SEIS completely fails to address the fact that disproportionate impacts exists if the magnitude of the adverse effect is	An <u>Environmental Justice Analysis Report</u> was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (EJ) population in accordance with all applicable federal and state guidelines. Where differences in methodology occurred, the most conservative and inclusive approach was followed. The EJ analysis was conducted in accordance with the U.S. Department of Transportation Order 5610.2C and FHWA Order 6640.23A, which define disproportionately high and adverse effects. The EJ analysis also followed FHWA's <i>Guidance on Environmental Justice and NEPA</i> (December 16, 2011). The <u>Environmental Justice Analysis Report</u> presents data from USEPA's environmental justice mapping and screening tool (EJ Screen) for PM2.5, diesel particulate	Environmental Justice (4.1.7) Disadvantaged Communities (4.1.9)



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			appreciably greater on persons of color than on white persons. For example, the EPA environmental justice screens themself, which the agencies apparently did not even bother to collect, much less consider, show far greater burdens related to pollution and adverse health effects in black and Latinx neighborhoods. Even assuming arguendo that a similar percentage of white residents had the same pollution exposure, the adverse effects are almost certainly disproportionately greater on persons of color. The higher poverty rates and the fewer assets available to Black and Latinx communities will also increase the magnitude of the harms to them. Whereas here a discriminatory effect exists. Title VI requires the agencies to ensure that mitigation measures are taken and documented to eliminate or minimize a disparate impact. Where a disparate impact cannot be eliminated, agencies shall ensure that the activity will only be undertaken if a substantial, legitimate justification for the action exists and is documented and that activity is the least discriminatory alternative We are requesting a full EIS. That is all. Thank you.	matter in the air, and the air toxics respiratory hazard index. Environmental indicators synthesized by USEPA show that pollutant levels are relatively high when compared to statewide data for Kentucky and Ohio. To further evaluate air quality considerations for EJ populations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no-build, and 2050 build scenarios. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the EJ study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the EJ study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Twenty (20) percent of the census block groups with minority and/or low-income populations in the EJ study area are in Kenton County; therefore, the slightly greater level of PM2.5 when the 2050 build scenario is compared to the 2050 no-build scenario will not be predominately borne by EJ populations nor is it appreciably more severe or greater in magnitude than the level of PM2.5 emissions for the non-EJ population. Given the above, Refined Alternative I (Concept I-W) is not anticipated to result in an adverse effect on air quality in EJ communities. The EJ analysis concluded that the temporary and permanent adverse effects to EJ populations, and are not appreciably more severe or greater in magnitude than those experienced by non-EJ populations. In addition, EJ communities have been, and will continue to be, provided full and fair participation in the transportation decision-making process. Therefore, Refined Alternative I (Concept I-W) will not cause disproportionately high and adverse effects on any minority or low-income populations in accordance with the provisions of Executive Order 12898 and FHWA Order 6640.23A. Furthermore, several avoidance, minimization,	

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				mitigation, and enhancement measures have been incorporated into Refined Alternative I (Concept I-W) to reduce adverse effects and provide additional benefits.	
				KYTC and ODOT evaluated the effects of Refined Alternative I (Concept I-W) on health burdens in disadvantaged communities in a <u>Socioeconomic</u> <u>Technical Report</u> (January 2024). The analysis concluded that Refined Alternative I (Concept I-W) will not further contribute to health burdens; rather, Refined Alternative I (Concept I-W) may result in potential better health outcomes for those with asthma, diabetes, heart disease, or low life expectancy due to improved access to healthcare destinations, improved options for active transportation, and improved air quality due to improved traffic flow and reduced vehicle idling.	
B-129	Fedder, Rachel	B-129-1	02/22/2024 - I am a Covington resident, and I was reading over the environmental report. I was reading over the report, and I didn't notice that there were any metrics in regards to the outputs of construction and how it might affect the structures. In the report. You guys list that you're gonna go through, I think it's like six different historical zones, but it doesn't list the implications or potential effects that might happen to these structures. So, I'm just kind of curious what you guys are expecting there or if there's any type of review we might be able to find there.	KYTC and ODOT evaluated cultural resources in accordance with Section 106 of the National Historic Preservation Act of 1966 (Section 106) and implemented through Title 36 of the Code of Federal Regulations part 800. Studies evaluated an area of potential effects that encompasses the project limits for Refined Alternative I (Concept I-W), including the direct limits of disturbance and a sufficient buffer for audible and visual effects where they may be likely to occur. Refined Alternative I (Concept I-W) will have no effect on 22 and no adverse effect on 13 properties that are eligible for listing on the National Register of Historic Places within the project's area of potential effects.	History/ Architecture Resources (4.5.2)
				Refined Alternative I (Concept I-W) will have an adverse effect on the Lewisburg Historic District. Refined Alternative I (Concept I-W) will remove three houses along Bullock Street between West 12 th Street and Pike Street in the Lewisburg Historic District. Impacts will be mitigated through the recordation of removed structures; the establishment of a \$1.2 million grant program to improve and rehabilitate the façades of residential and commercial properties in the Lewisburg Historic District; and the protection, monitoring, and repair of historic	



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				structures from vibration during construction. Noise barriers are also proposed to mitigate noise impacts.	
				Refined Alternative I (Concept I-W) will also have an adverse effect on Longworth Hall, which is listed in the National Register of Historic Places. Refined Alternative I (Concept I-W) will remove 204 feet of the Longworth Hall building. Impacts will be mitigated by the completion of repair, upgrade, restoration, enhancement, and refurbishment on the portions of the building impacted by construction and the portions of the building to remain. ODOT is in the process of purchasing the full Longworth Hall property from a willing seller. ODOT's potential use of the interior and exterior of the building or affect its continued use or access. The mitigation measures for the Lewisburg Historic District were coordinated with consulting parties in Kentucky. The mitigation measures for Longworth Hall were coordinated with consulting parties in Ohio. A Section 106 Programmatic Agreement specifies the mitigation measures for the Lewisburg Historic District and Longworth Hall, which are incorporated into the project's environmental commitments.	
B-130	Mullins, Pamela	B-130-1	02/20/2024 - I'm also a resident of Covington. First, I would like to say that I echo Matt Butler's comments and appreciate those.	KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including those provided by the individual mentioned by the commenter, prior to FHWA making a final decision on the supplemental Environmental Assessment. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	Public Hearing (5.5)
		B-130-2	02/20/2024 - Second, I do have some questions of my own. For mussels that are impacted, the relocation of those that you	All native mussel species within the state of Ohio are protected by state law (Ohio Revised Code Section 1533.324). Therefore, the environmental commitments	Threatened or Endangered Species (4.2.4)



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			referred to being upstream, asking if that would be upstream in Kentucky, Indiana, Ohio. Not sure what you mean by that.	include mussel salvage (relocation) within areas of direct impact and appropriate salvage zone buffers that will be conducted per the <i>Ohio Mussel Survey Protocol</i> . In accordance with the protocol, relocation sites shall be located upstream (preferred) in an area of equal or better habitat, or to an approved relocation site in a discrete area recommended by the Ohio Department of Natural Resources and the U.S. Fish and Wildlife Service. The Ohio River flows east to west through the project area. Therefore, upstream areas are located east of the existing Brent Spence Bridge (BSB).	
		B-130-3	02/20/2024 - Regarding the Goebel Park basketball courts that are being removed. The question I have about that is there's also going to be parks, as I was listening, removed in the Lewisburg area. So, my concern is what type of activity would you have during that time regarding the ability to play basketball for the kids and any adults that do so.	Refined Alternative I (Concept I-W) will not remove any parks, nor will it impact any parks in the Lewisburg area in Kentucky. Refined Alternative I (Concept I-W) will acquire 2.84 acres of permanent right-of-way, including 360 feet of walking trails, two basketball courts, and associated resources from the Goebel Park Complex. Impacts will be mitigated through the provision of replacement land; reconstruction of the walking trail within the complex; and a financial commitment from KYTC for the development of a new Goebel Park Complex Master Plan, replacement and enhancement of the basketball courts or other outdoor recreation facilities within the park, and a relocated outdoor pool and associated facilities or other comparable aquatic facility serving the same purpose within the park. Noise/visual screening barriers are also proposed to provide enhanced sound reduction in the complex. In addition, the separation of interstate runoff from the combined sewer overflows in the complex. A more detailed description of the proposed mitigation measures for the basketball courts is provided below. The taking of the basketball courts and associated resources will be mitigated by allocating approximately \$94,500 of project funds for the replacement and enhancement of the basketball courts or for other outdoor recreation facilities within the park to be established	Goebel Park Complex (4.13.3)



ID	Name	No.	Comment	Response	Reference ¹
				during the new master planning process facilitated by the City of Covington. In the event that project phasing requires the basketball courts to be impacted prior to replacement facilities being constructed, up to \$75,000 of additional project funds will be allocated to construction of a temporary facility within a portion of the Goebel Park Complex not impacted by the project. Therefore, the operation of the basketball courts will be maintained throughout construction.	
		B-130-4	02/22/2024 - The next question I have is I want a better understanding of what is the credit for a wetland. That was rather confusing to me. I'm not up to date on what that terminology means.	Mitigation measures for wetland impacts may involve the debit of credits from KYTC's Bath County/Ova Arnett advanced mitigation site. While the mitigation measures will be finalized in coordination with the U.S. Army Corps of Engineers (USACE) and the Kentucky Division of Water (KDOW) during the permitting process, compensatory mitigation for wetlands may require up to eight adjusted mitigation units. Adjusted mitigation units are the number of credits needed to compensate for project impacts to waters of the United States (including wetlands and streams/rivers). The determination of the required number of adjusted mitigation units considers factors such as the type, quality, and function of the resource.	Wetlands (4.2.1)
				Sufficient credits to mitigate wetland impacts for Refined Alternative I (Concept I-W) are presently available at the Bath County/ Ova Arnett mitigation site. The credits will be used to offset unavoidable impacts to wetlands in the lower Licking River watershed, Northern Kentucky mitigation service area. The Bath County/Ova Arnett advanced mitigation site restored wetland habitat functions to previously farmed land in the same river basin (Licking River) and mitigation service area (Northern Kentucky) as the impacted wetlands.	
				Should there be insufficient credits at the Bath County/Ova Arnett mitigation site, KYTC will make the necessary purchase of wetland adjusted mitigation units from the In-Lieu Fee Mitigation Program administered by the Kentucky Department of Fish and Wildlife Resources	



ID	Name	No.	Comment	Response	Reference ¹
				(KDFWR). All in-lieu fee credits purchased from KDFWR are used to repair and restore wetlands in the same service area as the impacted wetlands (the lower Licking River/Northern Kentucky mitigation service area).	
		B-130-5	02/22/2024 - The fourth question that I have is regarding the Peaselburg stormwater reload. Well, I wasn't quite sure what that meant, but it was something regarding stormwater during the construction where the state and would be giving some funding for that particular piece. And I know with the reconstruction there will be runoff potentially coming down the hill to several of the neighborhoods. But just had a question regarding a better understanding of what the relationship is for the Peaselburg community, that concludes my comments.	In northern Kentucky, transportation projects must address the quantity of stormwater runoff by separating interstate runoff from combined sewer systems. While only runoff from new impervious area is required to be separated, KYTC will separate all interstate runoff from the BSB corridor from the existing combined sewer system. While the separation measures will reduce the volume flowing into the existing combined sewer system, including in the Peaselburg area, modeling showed that the separation measures alone would not eliminate surcharging in the Peaselburg neighborhood. During detailed design, KYTC will work with the City of Covington and Sanitation District No. 1 of Northern Kentucky (SD1) to address surcharging in the Peaselburg neighborhood based on the local design criteria for a 25-year storm, which will further reduce flooding in this neighborhood. Best management practices (BMPs) will also be developed by the resident engineer and contractor prior to onsite activities to ensure continuous sediment and erosion control throughout the construction and post- construction period.	Utilities (4.12.1
		B-130-6	02/22/2024 - I am from Covington, Kentucky. I'm calling regarding the inclusion of the disadvantaged business enterprises, particularly in this area, to be sure that there is inclusion of them. I believe this is a prevailing wage project, which means the salaries are going to be good salaries that are out there. However, I'm not sure how many businesses are qualified to participate in this. What I have seen, because I have managed these types of programs in the past, is that the ones locally are too small to be included in certain types of opportunities. There needs to be a way to be	During the progressive design-build contract (Phase III of the BSB Corridor Project), KYTC and ODOT will establish separate goals for disadvantaged business enterprise (DBE) participation in both the design and construction portions of the contract. To provide opportunities for businesses of all sizes to participate in the project, KYTC and ODOT have secured a change to the prequalification requirements for the BSB Corridor Project which will make it easier for small, disadvantaged, and minority owned businesses to perform construction work on the project. This change increases the amount of construction work a non-prequalified firm can perform on the project, allowing firms who are not prequalified with KYTC or ODOT to	Economy and Employment (4.1.6)



ID	Name	No.	Comment	Response	Reference ¹
			sure that inclusion does get down to the smallest enterprise that you're able to do, and understanding how you might be able to put in some types of, not exceptions necessarily, but some types of qualifications that will allow for inclusion to happen. For example, I know Alicia Reese in Hamilton County recently put in some different incentives, so I want to be sure that they are included in these business opportunities, but also regarding the wildlife, the air, the water, and the opportunity to encourage social engagement of diversity along this new opportunity that this money is going to bring for our area.	perform up to \$1 million per year on the BSB Corridor Project.	
B-131	Anonymous	B-131-1	02/22/2024 - Have we done traffic studies on roads to potentially block off? West 12 th in Covington was overwhelmed with traffic during the last bridge construction project. Multiple ambulances were stuck in traffic because it's too narrow to accommodate the influx.	During construction, the area surrounding the I-71/I-75 corridor will be temporarily impacted by increased traffic on local roads, reduced access, and detours due to construction activities. These impacts are anticipated to some extent for all modes of transportation, including vehicular, pedestrian, bicycle, and transit. KYTC and ODOT are working with local cities and counties to mitigate impacts from construction activities. On June 15, 2022, KYTC and the City of Covington finalized a Memorandum of Understanding (MOU) regarding the National Environmental Policy Act (NEPA) process. Among other items, the MOU addresses measures to minimize temporary construction impacts. KYTC and ODOT will prepare detailed traffic management and maintenance of traffic (MOT) plans to minimize traffic disruptions to vehicular, bus, pedestrian, and bicycle traffic during construction. The MOT plan will evaluate available travel lanes on the mainline interstate during construction to reduce the potential that the project will induce traffic diversion similar to that experienced during recent closures and restrictions on the existing Brent Spence Bridge. A project incident management plan will be developed to minimize diversion resulting from incidents occurring within the project limits during	Construction Impacts (4.11)



ID	Name	No.	Comment	Response	Reference ¹
				construction to the extent practicable. The City of Covington will be provided an opportunity to review and comment on the MOT and incident management plans as they are developed. KYTC will work directly with the City of Covington to ensure that all relevant agencies and first responders, including police, fire, and emergency services, have an opportunity to review and provide input into all aspects of MOT planning, MOT and incident management plan development, and construction period operations affecting their respective cities.	
B-132	Ambius, Kelly	B-132-1	02/22/2024 – I'm also a resident of Cincinnati. I support Matt Butler's what he was saying, and I have a couple of questions.	KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including those provided by the individual mentioned by the commenter, prior to FHWA making a final decision on the supplemental Environmental Assessment. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	Public Hearing (5.5)
		B-132-2	02/22/2024 - I take Linn Street and Findlay all the time, so I'm not sure what exactly is happening there because it seems far removed from the highway. So, if that could be discussed or just made clearer.	Refined Alternative I (Concept I-W) will replace the Linn Street bridge over I-75. The new Linn Street bridge will have the same number of lanes that exist today, but it will be longer to accommodate a wider I-75. A sidewalk will be provided on the south side of the Linn Street bridge, and a shared-use path will be provided on the north side of the bridge. Refined Alternative I (Concept I-W) will replace the I-75 bridge over Findlay Street with minimal work on Findlay Street. Sidewalks and bike lanes will also be provided on the portions of Findlay Street between Winchell Avenue and Western Avenue.	Project Description (1.1)
	I have to say it's making me sick, is that you are destroying this bat habitat. I heard that the	Refined Alternative I (Concept I-W) will disturb or remove 4.38 acres of riparian forested habitat, which will result in the loss of potential foraging areas for the federally endangered gray bat. Approximately 90.00 acres of	Threatened or Endangered Species (4.2.4)		



ID	Name	No.	Comment	Response	Reference ¹
			where are you relocating the bats and then the destruction of nature reducing the parks. Again, this is just making me sick.	forested habitat that will be removed by Refined Alternative I (Concept I-W) may serve as foraging or maternity areas for federally endangered Indiana bats; suitable habitat for the federally endangered northern long-eared bat. Impacts to the Ohio state listed endangered little brown bat and tricolored bat are also expected due to tree removal in Ohio. No evidence of potential hibernacula in proximity to the project or use or presence of bats along the bridges in the project area was found. The tricolored bat has also been proposed for listing as a federally endangered species.	
				Refined Alternative I (Concept I-W) incorporates several measures to minimize and mitigate effects on the Indiana bat, gray bat, the northern long-eared bat, little brown bat, and tricolored bat. Ohio and Kentucky follow separate policies, programmatic agreements, and regulations concerning these species; therefore, each state will incorporate separate minimization and mitigation measures.	
				In Kentucky, the mitigation measures include providing a contribution to the Imperiled Bat Conservation Fund, which will offset project-related impacts to terrestrial habitats by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts. Tree removal in Kentucky will be minimized, and no tree removal will occur from June 1 to July 31 when federally listed bats may be using those habitats. In addition, measures to protect stream areas in Kentucky will be implemented both during and after construction.	
				In Ohio, the mitigation measures include avoiding tree removal in excess of what is required to implement the project safely. No tree removal in Ohio will occur from April 1 through September 30, when federally and state listed bats may be using those habitats. Ohio standards and specifications related to lighting; dust control; and water quality, wetland, and stream protection will also	



ID	Name	No.	Comment	Response	Reference ¹
				minimize and mitigate effects to federally and state listed bat species.	
				The supplemental Environmental Assessment presents assumed potential habitat for threatened and endangered bat species. Because trees will only be removed during times of year when federally and state listed bats are not expected to be utilizing those habitats, relocation of bat species will not occur. Relocating bats may cause more harm and could result in additional take of these species.	
B-133	Weidl, Garry	B-133-1	02/22/2024 - I'm a resident of Lewisburg. I was looking at the environmental commitments, PDF online, and in the noise section on page 22 of 44, it talks about a noise barrier on southbound I-75 running from Third Street to south of Hermes Avenue. And from what I've learned from the going to the physical meetings that that barrier is not continuous. It stops between Watkins Street and Old Hinde Street. This is on the west side of the expressway, on the Lewisburg side, and there's a section there, 50 or a hundred feet long that will not have the, the wall, the noise barrier they're talking about. And that is a natural funnel there, or megaphone, if you wish, with the low spot being down by the expressway, moving up to Hermes Avenue and Watkins and Hinde Street. Those are all high spots, at least 30 or 40 feet higher. So, the noise has been taking everyone's backyards and their back porches since the expressway was first put in. And with each, each successive encroachment from the highway and nothing has been done about it. And so, I've put in other comments before in written form, but I just wanted to make sure that something is done about that.	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the portions of the corridor that include Watkins Street and Hinde Street in a <i>Traffic Noise Impact Analysis: Brent</i> <i>Spence Bridge Corridor Project Kentucky – Northern</i> <i>Section (August 2023)</i> and a <i>Noise Analysis Technical</i> <i>Memorandum Kentucky – Northern Section</i> (<i>November 2022</i>). As a result of those studies, KYTC is proposing a noise barrier on the west side of I-71/I-75 from West 3 rd Street to south of Hermes Avenue, which includes the area referenced by the commenter. The noise barrier in this area consists of several stand-alone noise walls. The proposed noise walls are located immediately adjacent to I-71/I-75 in the vicinity of Watkins Street and at the top of the slope west of the interstate in the vicinity of Hermes Avenue. The placement of the stand-alone noise walls was determined based on a barrier analysis and was determined to provide the greatest noise reduction in this noise sensitive area. The proposed noise barrier was found to be feasible and reasonable when situated in the existing topography. During detailed design, and in accordance with the KYTC <i>Noise Analysis and Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise and noise/visual screening barriers (benefitted receptors) at each location where they are proposed in Kentucky.	Noise - Kentucky (4.8.1)

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				KYTC will further evaluate the space between the stand alone noise walls in the area referenced by the commenter during detailed design and the noise public involvement process.	
B-134	Zinzer, Todd	B-134-1	02/22/2024 - I am a Cincinnati resident, and my comment is concerning the cost and the schedule of the project and what type of structure is put in place by the project to contain costs and to keep the project on schedule. It's been 20 years in the making. It's a very important project to the city and to the states of Kentucky and Ohio. And I would just like to see somewhere the project lining out who's responsible for oversight and what structures in place to contain the cost and keep the project on schedule. For example, you have two different states involved, which means two different federal highway divisions. I don't know if this is a mega project that that they used to have at Federal Highways, but I think it would be good for the public to know who's ultimately responsible and what project is gonna do to contain costs and to keep it on schedule.	KYTC and ODOT have established a Bi-State Management Team to focus on procurement, financing, and project communications, and the Bi-State Management Team will continue working together to deliver the Brent Spence Bridge (BSB) Corridor Project. The BSB Corridor Project has been designated a Major Project by FHWA. As such, Title 23 of the United States Code section 106(h)(2) requires the development of a <i>Project Management Plan</i> . The Bi-State Management Team and FHWA have developed a <i>Project Management</i> <i>Plan</i> for the BSB Corridor Project, which will be updated as the project phases advance. Among other items, the <i>Project Management Plan</i> provides project organizational management, project management controls of the contract, scope, cost, schedule, risk, and quantities, communication, and documentation and reporting. For more information about <i>Project Management Plans</i> , please visit: https://www.fhwa.dot.gov/majorprojects/pmp/index.cfm.	Project Description (1.1)
B-135	Reinhardt, Jess	B-135-1	02/22/2024 - I am a new Newport resident, but I work in Cincinnati, and I use 71/75 regularly. I've got a couple of questions, but the first is, why are there no noise barriers on the west side of the highway in Cincinnati? That seems curious as there's already a lot of, I don't know. Sorry, I don't know what I'm saying there, but yeah, so curious about that.	ODOT evaluated noise for Refined Alternative I (Concept I-W) and documented the results in a <u>Noise</u> <u>Analysis Report</u> (October 2023). The Ohio analysis identified noise impacts at three isolated residences on the west side of I-75 in Cincinnati; however, the impacted residences are spaced over a distance of about 2,000 feet. Noise mitigation for isolated residences is not cost effective per ODOT's noise policy, and noise mitigation is not proposed for these residences. The Ohio analysis also identified noise impacts at the Cincinnati Job Corps, which is also west of I-75 in Cincinnati. Noise barriers were evaluated for the Cincinnati Job Corps but were not found to be cost effective per ODOT's noise	Noise - Ohio (4.8.2)



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				policy; therefore, noise mitigation is not proposed in this location.	
		B-135-2	02/22/2024 - I'm also eager to explore, like, this could be an opportunity for us to be, like the area, Cincinnati area to be an example of what cities could do moving forward with infrastructure, with climate change,	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic.	Greenhouse Gases and Climate Change (4.7)
				Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined	



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				Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan.</i>	
		B-135-3	02/22/2024 - with promoting buses	The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	Travel Patterns and Access (4.1.4)
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing Brent Spence Bridge for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-135-4	02/22/2024 - and biking and walking. Like the best parts of Cincinnati, I think OTR, Mount Airy, Hyde Park, these places are wonderful, or I think they're great because they're so easily accessible. You can walk there, and Newport is wonderful because you can walk there. If you go outside further like Florence, it's not very walkable, it's not accessible,	Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	Travel Patterns and Access (4.1.4)
		B-135-5	02/22/2024 - and by furthering expansions of highways, we're just cutting off more parts of	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric	Purpose and Need (2.)



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			the community. We're discouraging folks from, you know, being out in their community,	deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several enhancements to further benefit surrounding communities. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements. In addition, KYTC and ODOT are continuing to coordinate local connections with the cities in the project corridor.	Neighborhood and Community Cohesion (4.1.2)
		B-135-6	02/22/2024 - let alone not, not to mention destroying, relocating businesses, which is going to disrupt how a community functions.	Refined Alternative I (Concept I-W) requires 1 partial commercial, and 24 full commercial (including 14 tenants in one structure) relocations. In addition, ODOT is in the process of purchasing the full Longworth Hall property at a mutually agreed upon price and from a willing seller as a result of the right-of-way negotiation process. The building will remain occupied, and only businesses directly impacted by the removal of 204 feet from the building's east end will be relocated. Relocated tenants were provided the option of relocating into other available space within Longworth Hall, and three tenants chose to relocate within the same building.	Relocations (4.1.5)
				ODOT may use interior space or the exterior grounds surrounding the building during the project's construction, but no impacts to the building's continued use for commercial office, retail, and event space are anticipated. Parking spaces adjacent to Longworth Hall and in the southern portion of the parking lot will not be impacted by the project. Sufficient parking will remain available to meet the needs of current and future tenants. Project staff will be provided parking in a secured area in the northern portion of the parking lot.	
				The acquisition of property for right-of-way (including business relocations) has been, and will continue to be, in accordance with the Uniform Act, which provides relocation services to impacted property owners and tenants. The majority of the Ohio businesses have	



ID	Name	No.	Comment	Response	Reference ¹
				already been relocated and removed under the 2012 Environmental Assessment and Finding of No Significant Impact. Ongoing acquisition activities in Kentucky and Ohio have indicated that affected businesses will be able to relocate within the same geographic area if so desired, either in existing structures or new construction. None of the commercial relocations is expected to result in substantial job loss or economic impact, nor are they known to be substantial employers or serve unique needs within the surrounding communities. Therefore, Refined Alternative I (Concept I-W) is only expected to result in minor impacts due to commercial relocations.	
B-136	Winter, Maxim	B-136-1	02/22/2024 - I am a resident of the Cincinnati metro area, and I am a, just an interested	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and	Purpose and Need (2.)
		citizen. I think that this project, I have a few concerns regard this project. I think it's a very expensive and large scale, surface level solution to, to a much bigger problem, because while congestion in the Cincinnati metropolitan area is a major issue, especially along the Brent Spence corridor, time and time again, research has found that increasing highway capacity, you know, adding more lanes, building a whole new bridge is not an effective way to reduce traffic.	level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> (<i>December 2023</i>), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8)	
			When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated		

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				into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-136-2	02/22/2024 - And instead, other solutions like improving alternates, transportation, like public transportation, bicycling routes, bicycle infrastructure, pedestrian infrastructure are very effective.	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit routes would not meet the project purpose and need and are not considered to be a reasonable alternative for the BSB Corridor Project.	Purpose and Need (2.) Travel Patterns and Access (4.1.4)
				Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	



ID	Name	No.	Comment	Response	Reference ¹
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-136-3	02/22/2024 - And also regarding the many tractor trailers and trucks that use the corridor, perhaps rooting them around the beltway, requiring that three trucks not use the Brent Spence corridor would, I think, be a much more effective and much less expensive, and have a much lower impact on the area solution as opposed to this very expensive, multi-billion dollar project.	In 2005, KYTC and ODOT conducted a <u>Feasibility and</u> <u>Constructability Study of the Replacement/Rehabilitation</u> <u>of the Brent Spence Bridge</u> . Among other considerations, the study evaluated the impacts and costs of prohibiting all through trucks on the existing BSB. The study concluded that the issue of diverting trucks from the existing BSB has regional implications in terms of increased traffic on a number of travel corridors, and such prohibitions would increase costs to the users.	Purpose and Need (2.)
				In 2007, and as part of a separate study, OKI, the Metropolitan Planning Organization (MPO) for the area, completed a <u>Brent Spence Bridge Truck Ban Analysis</u> . A ban on through trucks on the northern Kentucky portion of I-71/I-75 was found to have no substantial benefits. The volumes of diverted traffic were relatively small compared to the overall volume, and the impact on severe crashes within the system was minor. Furthermore, operating costs to the trucking industry would negatively impact the region. The deployment of a truck ban would also present difficulties in terms of enforcement. Therefore, diverting	



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				truck traffic would not be effective and is not considered to be a reasonable alternative for the BSB Corridor Project.	
B-137	Tucker, Tara	B-137-1	02/22/2024 - I am the chair of the Covington Urban Forestry Board. We have concerns about the environmental impact of this project, and we'd like to request a full environmental impact investigation or study.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act (NEPA) reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	Introduction (1.)
		B-137-2	02/22/2024 - And we also have concerns about routing this much traffic straight through the city. It doesn't seem like it was the best plan to begin with for the air quality of the people living in Covington and Cincinnati.	An <u>Interchange Modification Study Addendum</u> (December 2023) prepared for the project concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods.	Traffic (3.8) Air Quality (4.6)



ID	Name	No.	Comment	Response	Reference ¹
				Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	
				KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <i>Quantitative MSAT Analysis Report (August 2023).</i> The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle	



ID	Name	No.	Comment	Response	Reference ¹
				emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant. Temporary construction-related air quality impacts are	
				expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-137-3	02/22/2024 - And routing as much traffic as possible through 275 would be a smarter way to go and a healthier one for everyone living in this area.	In 2005, KYTC and ODOT conducted a <u>Feasibility and</u> <u>Constructability Study of the Replacement/Rehabilitation</u> <u>of the Brent Spence Bridge</u> . Among other considerations, the study evaluated the impacts and costs of prohibiting all through trucks on the existing Brent Spence Bridge (BSB). The study concluded that the issue of diverting trucks from the existing BSB has regional implications in terms of increased traffic on a number of travel corridors, and such prohibitions would increase costs to the users.	Purpose and Need (2.)
				In 2007, and as part of a separate study, the Ohio- Kentucky-Indiana Regional Council of Governments (OKI), the Metropolitan Planning Organization (MPO) for the area, completed a <u>Brent Spence Bridge Truck Ban</u> <u>Analysis</u> . A ban on through trucks on the northern Kentucky portion of I-71/I-75 was found to have no	



ID	Name	No.	Comment	Response	Reference ¹
				substantial benefits. The volumes of diverted traffic were relatively small compared to the overall volume, and the impact on severe crashes within the system was minor. Furthermore, operating costs to the trucking industry would negatively impact the region. The deployment of a truck ban would also present difficulties in terms of enforcement. Therefore, diverting traffic would not be effective and is not considered to be a reasonable alternative for the BSB Corridor Project.	
B-138	Pel, Alexander	B-138-1	02/22/2024 - I am in Independence, Kentucky, but I use the Brent Spence Bridge regularly. I wanted to echo some of what the previous callers have been saying about issues with equity and induced demand. But I also, I understand the necessity for this project and agree with it, but I think it's a bit unfair to some of the residents who live in Cincinnati and Covington, as it seems to be a project meant to get suburban commuters in and out of the city as opposed to trying to help people who live inside the city more. I think there's things that could be done to help with this project to help people who live in the city that it goes through, such as adding sacrificial slabs to the design of the Ezzard Charles overpass, so that a future streetcar expansion could go to Union Terminal. When Fort Washington Way was rebuilt, two of the bridges were built with sacrificial slabs so that the streetcar could be put through when it was time to do so.	KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including those provided by the previous callers referenced by the commenter, prior to FHWA making a final decision on the supplemental Environmental Assessment. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown Cincinnati area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor. In consideration of feedback provided by the City of Cincinnati Department of Transportation and Engineering, ODOT will design and construct the non-deck components for the new Ezzard Charles Drive bridge over	Purpose and Need (2.) Neighborhood and Community Cohesion (4.1.2) Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)

ID	Name	No.	Comment	Response	Reference ¹
				I-75 to not preclude potential future streetcar route expansion. The design modification will not change the footprint or the environmental impacts of the project.	
		B-138-2	02/22/2024 - I also think that it should be explored options such as bus lanes or bus shoulders on the Brent Spence Bridge itself, or even putting sacrificial slabs on the bridge for someday a light rail transit system. I think it's not very forward thinking to focus so much on car traffic with everything that's happening and some of the momentum towards urbanism and caring about multimodal transportation, I hope that this comment period will give a chance for ODOT and KYTC to review more possible options.	In 2004, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <i>North South Transportation</i> <i>Initiative</i> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and need and is not considered to be a reasonable alternative for the Brent Spence Bridge (BSB) Corridor Project. The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	Purpose and Need (2.) Travel Patterns and Access (4.1.4)
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing	



ID	Name	No.	Comment	Response	Reference ¹
				congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
B-139	Robinson, Jody	B-139-1	02/22/2024 - I live in Northern Kentucky and have numerous concerns about this project. The leading up to it is very fuzzy science, so to speak. You know, you are quoting that it's one of the most congested truck corridors in the country. When the FHWA says it's number 54. And even the truckers organization, which is a lobby group, says it's number 15. So, you've broken trust so many times.	The Brent Spence Bridge (BSB) corridor forms a critical freight route connecting Canada to Florida, carrying more than \$1 billion of freight every day and more than \$400 billion of freight every year. Traffic congestion continues to hamper freight movement throughout the BSB corridor as evidenced by its ranking at 15 on the American Transportation Research Institute's list of the nation's top truck bottlenecks for the year 2023.	Project Description (1.1)
		B-139-2	02/22/2024 - So, the supplemental environmental is leaving so many questions. And last night I was actually at the meeting and listening to all of the great things that this project's going to bring, but it didn't bring up the issues within the environmental, nor what the environmental just completely lacked to address. I'm just very concerned. We need to have that full study done.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act (NEPA) reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	Introduction (1.)
				The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or	



ID	Name	No.	Comment	Response	Reference ¹
				a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	
		B-139-3	02/22/2024 - We really deserve more with questioning these numbers and what the congestion is based on and where that's coming from.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the Ohio- Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8)
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. OKI's regional travel demand model also includes projected population and employment growth. The <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods.	
		B-139-4	02/22/2024 - So, our residents shouldn't be getting death sentences when we're not already meeting the EPA air requirements.	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	Air Quality (4.6



ID	Name	No.	Comment	Response	Reference ¹
				KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <i>Quantitative MSAT Analysis Report (August 2023).</i> The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between	



ID	Name	No.	Comment	Response	Reference ¹
				the 2050 build and 2050 no-build scenarios is not considered to be significant.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-139-5	02/22/2024 - And then the cost of this much infrastructure. Sure, we have money, maybe, to build it. But, how are we going to maintain this much road and what is it doing to us over time?	The total project cost estimate is \$3.6 billion, which includes all costs required to deliver the project, including but not limited to planning, design, property acquisition, construction, construction management services, and agency labor. The cost of the companion bridge and the rehabilitation of the existing BSB will be split 50/50 between Kentucky and Ohio, and each state will pay for the approach work on their respective ends of the bridge. In December 2022, KYTC and ODOT received \$1.635 billion in federal funding grants under programs created by the Bipartisan Infrastructure Law. The Kentucky General Assembly passed, and Governor Beshear signed, a budget bill that included funding to fulfill state match requirements for large projects. Ohio's legislature approved the State Transportation Budget that allows ODOT to use a combination of other federal funding and state funding from the motor fuel tax and bonding.	Funding (1.2.1) Cost Estimates (3.6)
				KYTC and ODOT will be responsible for maintaining the project after work is completed. Maintenance will be part of ODOT's and KYTC's normal operating procedures, and funding will be set aside as part of each state's budgetary	



ID	Name	No.	Comment	Response	Reference ¹
				process. In addition, ODOT and KYTC have established <i>Transportation Asset Management Plans</i> that describe how each state manages its assets. The maintenance of the BSB Corridor Project will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
		B-139-6	B-139-6 02/21/2024 - And it's not forward thinking, you know, we are not learning from the lessons and the mistakes we have made. We are hurting people of color and people without financial means at a greater excess. And they keep being asked to come out and speak, but we know they don't after year and year of being	An <u>Environmental Justice Analysis Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on environmental justice (EJ) populations:	Environmental Justice (4.1.7)
			abused and mistreated.	 No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; 	
				- No adverse indirect and cumulative effects;	
				 No disproportionately high and adverse relocation, noise, or temporary construction effects; and 	
				- Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood.	
				The project has incorporated robust engagement of EJ populations. Opportunities for EJ communities to offer feedback about the project occurred during 16 targeted EJ/neighborhood outreach meetings in late 2022 and open-house project update meetings in August 2023. All meetings were attended by residents of the targeted neighborhoods.	
				Minority and low-income individuals were provided the opportunity to review the supplemental EA, attend in- person and virtual public hearings, and provide comments to KYTC and ODOT during the 30-day public availability	



ID	Name	No.	Comment	Response	Reference ¹
				period. To make sure that all populations were aware of these opportunities, postcards advertising the availability of the supplemental EA and the public hearings were delivered to nearly 50,000 mailboxes in the EJ study area. Public involvement will continue to occur during the design and construction of the project. Furthermore, KYTC and ODOT will continue coordinating with the Project Advisory Committee and local agencies and stakeholders, who will continue to act as liaisons to the communities immediately affected by the project.	
B-140	Hon, Rachel	B-140-1	02/22/2024 - I am a resident of Cincinnati and a concerned citizen. My biggest concern with this project, I guess there's two parts. One, I echo the concern that adding additional lanes of traffic is not actually going to solve any of our congestion issues. Science, and just anecdotally around the country, when more lanes are added, more traffic occurs, it doesn't solve anything.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, the OKI regional travel demand model was used to assign routes used by	Purpose and Need (2.) Traffic (3.8)
				travel demand model was dised to assign routes dised by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Traffic projections prepared for Refined Alternative I (Concept I-W) show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they	



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				were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange Modification Study</u> <u>Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-140-2	02/22/2024 - Secondly, I'm extremely concerned that this supplemental environmental impact doesn't really address any sort of greenhouse gas emissions or any sort of mitigations for that. I mean, it says that during the temporary construction related air quality impacts, there'll be mitigations, but no details into what that is. And then I'm really hard pressed to believe that there's actually going to be a decrease in greenhouse gases, which is stated in this document. I'd love to get more information into that.	The evaluation of greenhouse gases and climate change prepared for the supplemental Environmental Assessment followed the guidance issued by the Council on Environmental Quality using methodologies discussed and in consultation with the U.S. Environmental Protection Agency (USEPA). The analysis was conducted at a quantitatively high level using USEPA's MOtor Vehicle Emission Simulator (MOVES). MOVES is USEPA's official model for state implementation plans and transportation conformity analyses and is listed by the U.S. Department of Transportation as the most common approach for modeling greenhouse gas emissions for transportation projects.	Greenhouse Gases and Climate Change (4.7) Construction Impacts (4.11)
				KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted using travel demand models for the project's approved certified traffic. Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area	



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				transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				In addition, roadway construction can contribute to the total greenhouse gas footprint of on-road transportation, including emissions from extraction, transportation, and production of roadway construction materials, and emissions from fuel used onsite from construction equipment and vehicles. Construction emissions can also include greenhouse gas emissions from roadway resurfacing and reconstruction, routine maintenance, and traffic delay resulting from construction activity.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls.	
				During construction, KYTC and ODOT will develop and implement an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals. As described in Section 4.11.7 of the supplemental Environmental Assessment, the program will monitor levels of particulate matter that is 2.5 micrometers or less in diameter (PM2.5), nitrogen dioxide, and carbon monoxide during construction activities. If the data show that air quality levels are approaching a concern level that may result in an exceedance of the 24-hour National Ambient Air Quality Standard (NAAQS) for PM2.5, the 1-hour NAAQS for nitrogen dioxide, or the 8-hour NAAQS for carbon	



ID	Name	No.	Comment	Response	Reference ¹
				monoxide, then project-related operational and/or mechanical deficiencies will be identified and corrected, as required, if they are determined to be contributing factors. If the data result in any air quality levels that exceed the above-stated NAAQS for PM2.5, nitrogen dioxide, or carbon monoxide that are caused by project- related emissions, then the applicable construction activities will be suspended until the deficiencies are identified and corrected. Additional details related to the ambient air quality monitoring program will be determined during detailed design, including locations, times, and durations of air quality monitoring; protocols to address any exceedances of the NAAQS should they be observed; and how monitoring and enforcement data will be made available to the public.	
				Avoidance, minimization, and mitigation measures incorporated into the project's environmental commitments will help to address greenhouse gas emissions during construction. These measures include developing detailed traffic management, maintenance of traffic, and incident management plans to minimize traffic congestion; requiring ultra-low sulfur diesel fuel for all diesel-powered construction equipment; prohibiting the burning of any materials on the construction site; minimizing idling time for diesel-powered equipment to the greatest extent practicable; and using solar power for digital signs to the greatest extent possible.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	



ID	Name	No.	Comment	Response	Reference ¹
		B-140-3	02/22/2024 - Overall, I think there's much better ways to deal with this. I'd rather see ODOT dollars going to in increasing the infrastructure for electric vehicles. I also think that just in increasing public transportation between Kentucky and Ohio over that, you know, downtown Cincinnati area would be much better. So, I just have a lot of concerns and wanted to state that. That's my comment. Thank you.	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <i>North South Transportation Initiative</i> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75, and a highway improvement project was necessary to address capacity issues on I-75, including the BSB Corridor. Therefore, expanding transit routes would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project. The BSB Corridor Project addresses the highway component of the Initiative. The transit component included in the Initiative must be developed and championed regionally, and ODOT and KYTC are ready to support this when it is advanced at a regional level.	Purpose and Need (2.)
				Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Increasing infrastructure for electric vehicles would not meet the project purpose and need. However, both KYTC and Ohio are investing millions of dollars to improve electric vehicle infrastructure in their respective states. KYTC and Ohio are implementing electric vehicle infrastructure plans to increase the number of charging options in portions of Cincinnati and Covington as part of separate programs that are independent of the BSB Corridor Project.	
B-141	Hot, Jacob	B-141-1	02/22/2024 - I'm a resident of Covington, specifically on Dalton Street adjacent to the Goebel Park area. I'm just wondering what the impact would be on Dalton Street and if this would potentially impact my property value. Other than that, I think this is a great idea. It'll be great for the community.	Refined Alternative I (Concept I-W) will not directly impact any residences on Dalton Street, which is located in the Mainstrasse neighborhood in Covington. Refined Alternative I (Concept I-W) incorporates several mitigation and enhancement measures that will reduce noise and improve aesthetics for the communities immediately surrounding the Brent Spence Bridge corridor, including	Economy and Employment (4.1.6)



ID	Name	No.	Comment	Response	Reference ¹
				the Mainstrasse neighborhood. Furthermore, Refined Alternative I (Concept I-W) is anticipated to have only minor impacts to vehicular access and to improve pedestrian, bicycle, and transit access. Therefore, Refined Alternative I (Concept I-W) is not expected to impact property values or the attractiveness of rental properties near the corridor.	
B-142	Damron, Aspen	B-142-1	02/22/2024 - I've come to the meeting just to express my worries. I'm calling in to provide comment that on the Brent Spence Bridge Corridor Project, we're using a very old environmental review, and I feel like the existing environmental review or the supplemental one has failed to address a lot of concerns about air quality, about GHG emissions, about noise pollution, and I think that it would be best if there was additional time taken to do more review to make sure that this is really the right project for this region.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. These include new and updated air quality studies, new consideration of greenhouse gas emissions and climate change, and updated noise studies.	Introduction (1.) Air Quality (4.6) Greenhouse Gases and Climate Change (4.7) Noise (4.8)
				Air quality studies prepared for Refined Alternative I (Concept I-W) utilized 2020 existing, 2050 no-build, and 2050 build traffic forecasts that were developed using the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) travel demand model of record. The OKI travel demand model of record was also used to develop the certified traffic projections that were used for the traffic operational analyses for the project. The air quality studies concluded that Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	



ID	Name	No.	Comment	Response	Reference ¹
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
				KYTC and ODOT also conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. The studies concluded that greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	



ID	Name	No.	Comment	Response	Reference ¹
				KYTC and ODOT evaluated noise for Refined Alternative I (Concept I-W) in accordance with their respective state noise policies. As a result of those studies, KYTC is proposing seven noise barriers to mitigate noise impacts in Kentucky, and ODOT is proposing five noise barriers to mitigate noise impacts in Ohio. Recognizing from neighborhood outreach efforts that traffic noise is a primary concern of area residents, KYTC conducted technical studies to evaluate additional noise/visual screening barriers where noise impacts were predicted but noise barriers were not warranted. Based on the technical feasibility and public comments received during outreach activities, KYTC is proposing two additional noise/visual screening barriers in Kentucky.	
				In accordance with the KYTC <i>Noise Analysis and</i> <i>Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from proposed noise barriers and noise/visual screening barriers during the detailed design phase of the Brent Spence Bridge (BSB) Corridor Project. In accordance with the ODOT <i>Analysis and Abatement of</i> <i>Highway Traffic Noise Policy Statement</i> , ODOT will conduct noise abatement public involvement with property owners and tenants who would benefit from proposed noise barriers in Ohio during the detailed design phases of the project.	
				Construction noise is expected to generate temporary noise impacts on adjacent and nearby properties, particularly those in residential land use. During construction, the project team has committed to incorporating proactive and reactive measures to address construction noise. This will be accomplished through equipment selection and maintenance, potential screening/shielding/barriers, scheduling of work, education of staff, and the development and implementation of the project's communication plan.	
		B-142-2	02/22/2024 - Especially considering the fact that traffic counts has been going down on the	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT,	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
			bridge in the last 10 to 15 years. I really wonder if this is the best thing for Cincinnati.	KYTC, and OKI. Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019.	
				KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum (December 2023)</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. OKI's regional travel demand model also includes projected population and employment growth. The <i>Interchange Modification Study Addendum</i> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods.	
				Traffic projections prepared during the preparation of the 2012 EA estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	



ID	Name	No.	Comment	Response	Reference ¹
B-143	Mounts, Jenny	B-143-1	02/22/2024 - I live in the greater Cincinnati area. I know that the traffic going over this bridge is horrendous and it's unsafe. We've needed this for over 20 years. I've lived in this city for almost 50. I understand, and I hear a lot of great concern from people who will locally be impacted in the Newport and downtown Cincinnati areas. I would just ask that ODOT and KYTC look at using some of the mitigation monies to improve the communities themselves, not just the impact of a loss of land, but perhaps providing new opportunities to improve those communities. It's not in my backyard, but it is in their backyard, and they deserve to have a compromise. If you have to take this from me, then please give me this instead, as an exchange.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown Cincinnati area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor. Refined Alternative I (Concept I-W) will not impact the City of Newport.	Purpose and Need (2.)
		B-143-2	02/22/2024 - I'd like to say to those who have suggested possibly rerouting highway traffic, the environmental impact of adding significant numbers of miles and diesel exhaust by rerouting around 275, that impact would far, far be worse than people driving straight through downtown Cincinnati. I am, have been in the transportation industry for several years. My husband is a truck driver. I am aware, and that's just gonna increase more cost of goods. Also, it's not the right solution.	KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including those referenced by the commenter, prior to FHWA making a final decision on the supplemental Environmental Assessment. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments. In 2005, KYTC and ODOT conducted a <i>Feasibility and Constructability Study of the Replacement/Rehabilitation of the Brent Spence Bridge</i> . Among other considerations, the study evaluated the impacts and costs of prohibiting all through trucks on the existing Brent Spence Bridge (BSB). The study concluded that the issue of diverting trucks from the existing BSB has regional implications in terms of increased traffic on a number of travel corridors, and such prohibitions would increase costs to the users.	Purpose and Need (2.) Public Hearing (5.5)



ID	Name	No.	Comment	Response	Reference ¹
				In 2007, and as part of a separate study, the Ohio- Kentucky-Indiana Regional Council of Governments (OKI), the Metropolitan Planning Organization (MPO) for the area, completed a <u>Brent Spence Bridge Truck Ban</u> <u>Analysis</u> . A ban on through trucks on the northern Kentucky portion of I-71/I-75 was found to have no substantial benefits. The volumes of diverted traffic were relatively small compared to the overall volume, and the impact on severe crashes within the system was minor. Furthermore, operating costs to the trucking industry would negatively impact the region. The deployment of a truck ban would also present difficulties in terms of enforcement. Therefore, diverting traffic would not be effective and is not considered to be a reasonable alternative for the BSB Corridor Project.	
		B-143-3	02/22/2024 - But just listen to the locals a little bit more and perhaps provide them some incentive and something to compensate them for this permanent inconvenience.	KYTC and ODOT have worked to incorporate several enhancements to provide additional benefits to surrounding communities. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements. KYTC and ODOT are continuing to coordinate the project with the cities in the corridor to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area.	Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2)
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public	



ID	Name	No.	Comment	Response	Reference ¹
				investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
B-144	Rook, Mimi	B-144-1	02/22/2024 - I am a resident of Camp Washington in the blue zone, and I live right next to the freeway. So, I've already been through the nightmare of I-75 widening during the last construction period. I have lovely cracks in my house from some of that work that occurred.	I-75 was widened through the majority of the Camp Washington neighborhood as part of ODOT's Mill Creek Expressway Project. The Brent Spence Bridge Corridor Project will widen a small section of I-75 in the southernmost section of the Camp Washington neighborhood to tie into the widening that was completed as part of the Mill Creek Expressway Project.	Project Description (1.1) Construction Impacts (4.11)
				Refined Alternative I (Concept I-W) is expected to result in temporary impacts for all transportation modes due to increased traffic on local roads, access restrictions, and detours. It is also expected to result in temporary utility impacts, air quality effects, noise increases, and erosion and sediment increases. Temporary economic and employment benefits are expected due to construction job creation and increased sale of construction-related supplies and services. Temporary construction impacts will be minimized and mitigated to the greatest extent practicable through the development of traffic management, maintenance of traffic, and incident management plans; coordination with local cities, transit agencies, and the regional incident management task force; notifications/outreach to public and trucking companies; and implementation of a dust control plan, measures to monitor and protect air quality, manage construction noise, and best management practices for erosion and sediment control.	
		B-144-2	02/22/2024 - But the other thing is the amount of noise.	The commenter did not provide a specific address or location. Therefore, only a general response regarding noise in the vicinity of the Camp Washington neighborhood, which was referenced by the commenter, can be provided.	Noise - Ohio (4.8.2)



ID	Name	No.	Comment	Response	Reference ¹
				ODOT evaluated noise for Refined Alternative I (Concept I-W) and documented the results in a <u>Noise</u> <u>Analysis Report</u> (October 2023). The Ohio analysis identified noise impacts at three isolated residences in the Camp Washington neighborhood; however, the impacted residences are spaced over a distance of about 2,000 feet. Noise mitigation for isolated residences is not cost effective per ODOT's noise policy, and noise mitigation is not proposed for these residences.	
		B-144-3	02/22/2024 - And then when traffic stalled, which I know a lot of it is because of the	An <u>Interchange Modification Study Addendum</u> (December 2023) prepared for the project concluded that Refined	Introduction (1.) Traffic (3.8)
			problems on the bridge, then I also have to deal with the fumes from people idling next to my home. I am going to echo Matt Butler on the	Alternative I (Concept I-W) will improve traffic flow and reduce the existing traffic back-ups on I-75 that are described by the commenter.	Air Quality (4.6)
			Environmental Impact Study and please, please, please what you have is from 12 years ago. And the other thing is the changes that are rapidly occurring with electric transportation. I am praying hard that those will help with some of the stuff we're dealing with, with internal combustion engines, but I know that's not gonna happen in the near, like in the next	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	
		couple of years. But I, I urge more study on the, the air quality issues and on the, on the damage to the communities in the blue zones where this construction is occurring.	KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <u>Quantitative MSAT Analysis Report</u> (August 2023). The		
			emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no-		
				build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in	
				emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and	

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				Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	



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				The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act (NEPA) reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. These include new and updated air quality studies. The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	
B-145	Anonymous	B-145-1	02/22/2024 - A project of this size warrants a full environmental impact study rather than a study that is older than a decade old.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act (NEPA) reevaluation and coordination efforts that	Introduction (1.)



ID	Name	No.	Comment	Response	Reference ¹
				have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public	
		B-145-2	02/22/2024 - Traffic is decreasing and additional lanes do not seem necessary given the amount and severity of short and long-term impacts. Previous similar projects and studies on highway expansions have shown that they do not decrease congestion.	Existing and historic traffic counts for the Brent Spence Bridge (BSB) were compiled using a variety of data generated by ODOT, KYTC, and the Ohio-Kentucky- Indiana Regional Council of Governments (OKI). Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre- COVID base year of 2019.	Traffic (3.8)
				KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> (December	



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				<i>2023)</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The Interchange Modification Study Addendum concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
				Traffic projections prepared during the preparation of the 2012 EA estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	
		B-145-3	02/22/2024 - What is needed instead are smarter solutions that reduce greenhouse gases, allowing for improved air quality by designing for mass transit, biking and walking.	KYTC and ODOT also conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's)	Purpose and Need (2.) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. The studies concluded that greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change. Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through	Air Quality (4.6) Greenhouse Gases and Climate Change (4.7)
				 their <i>Transportation Asset Management Plans</i>. The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i>. Air quality studies prepared for Refined Alternative I (Concept I-W) utilized 2020 existing, 2050 no-build, and 2050 build traffic forecasts that were developed using the OKI travel demand model of record. The OKI travel demand model of record was also used to develop the certified traffic projections that were used for the traffic 	
				operational analyses for the project. The air quality studies concluded that Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses	



ID	Name	No.	Comment	Response	Reference ¹
				such as schools, parks and recreation areas, and hospitals.	
				In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit routes would not meet the project purpose and need and are not considered to be a reasonable alternative for the BSB Corridor Project.	
				Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental EA. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing	



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				congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-145-4	02/22/2024 - A meaningful engagement of minority communities should be pursued since these communities will be disproportionately affected.	The project has incorporated robust engagement of minority and low-income (environmental justice) populations. Opportunities for environmental justice (EJ) communities to offer feedback about the project occurred during 16 targeted EJ/neighborhood outreach meetings in late 2022 and open-house project update meetings in August 2023. All meetings were attended by residents of the targeted neighborhoods. Community members generally supported the refinements, mitigation, and enhancements incorporated into Refined Alternative I (Concept I-W), including the reduction of the project footprint, the incorporation of additional noise/visual screening barriers, measures to reduce flooding and combined sewer overflows, new and improved multimodal facilities, additional developable land, and aesthetic features. During the EJ outreach comment period, community members offered additional feedback and suggestions. Every comment was evaluated by the project team, and individual responses were prepared and published on the project I-W) in direct response to the comments received. Unanticipated additional impacts on EJ populations were not identified during the EJ outreach. Minority and low-income individuals were provided the opportunity to review the supplemental EA, attend inperson and virtual public hearings, and provide comments to KYTC and ODOT during the 30-day public availability period. To make sure that all populations were aware of these opportunities, postcards advertising the availability of the supplemental EA and the public hearings were delivered to nearly 50,000 mailboxes in the EJ study area.	Environmental Justice (4.1.7) Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)



ID	Name	No.	Comment	Response	Reference ¹
				Public involvement will continue to occur during the design and construction of the project. Furthermore, KYTC and ODOT will continue coordinating with the Project Advisory Committee and local agencies and stakeholders, who will continue to act as liaisons to the communities immediately affected by the project.	
				An <u>Environmental Justice Analysis Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on EJ populations. The EJ analysis was conducted in accordance with the U.S. Department of Transportation Order 5610.2C and FHWA Order 6640.23A, which define disproportionately high and adverse effects. The EJ analysis also followed FHWA's <i>Guidance on Environmental Justice and NEPA</i> (December 16, 2011).	
				The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on EJ populations:	
				 No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; 	
				- No adverse indirect and cumulative effects;	
				 No disproportionately high and adverse relocation, noise, or temporary construction effects; and 	
				- Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood.	
B-146	Walker, Evan	B-146-1	02/22/2024 - I live in Cincinnati, Ohio, and I wanted to weigh in on the environmental side of the project and how many questions there seem to be out there about things like, you know, at a really granular level, what's gonna	Refined Alternative I (Concept I-W) will disturb or remove 4.38 acres of riparian forested habitat, which will result in the loss of potential foraging areas for the federally endangered gray bat. Approximately 90 acres of forested habitat that will be removed by Refined Alternative I	Threatened or Endangered Species (4.2.4)



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			happen to the endangered and threatened bat species?	(Concept I-W) may serve as foraging or maternity areas for federally endangered Indiana bats; suitable habitat for the federally endangered northern long-eared bat. Impacts to the Ohio state listed endangered little brown bat and tricolored bat are also expected due to tree removal in Ohio. No evidence of potential hibernacula in proximity to the project or use or presence of bats along the bridges in the project area was found. The tricolored bat has also been proposed for listing as a federally endangered species.	
				Refined Alternative I (Concept I-W) incorporates several measures to minimize and mitigate effects on the Indiana bat, gray bat, the northern long-eared bat, little brown bat, and tricolored bat. Ohio and Kentucky follow separate policies, programmatic agreements, and regulations concerning these species; therefore, each state will incorporate separate minimization and mitigation measures.	
				In Kentucky, the mitigation measures include providing a contribution to the Imperiled Bat Conservation Fund, which will offset project-related impacts to terrestrial habitats by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts. Tree removal in Kentucky will be minimized, and no tree removal will occur from June 1 to July 31 when federally listed bats may be using those habitats. In addition, measures to protect stream areas in Kentucky will be implemented both during and after construction.	
				In Ohio, the mitigation measures include avoiding tree removal in excess of what is required to implement the project safely. No tree removal in Ohio will occur from April 1 through September 30, when federally and state listed bats may be using those habitats. Ohio standards and specifications related to lighting; dust control; and water quality, wetland, and stream protection will also minimize and mitigate effects to federally and state listed bat species.	



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		B-146-2	02/22/2024 - What are we doing about runoff in an area where combined sewer overflows are an issue?	Refined Alternative I (Concept I-W) will separate all interstate stormwater runoff in the project corridor from existing combined sewer systems in both Kentucky and Ohio and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding in the communities in surrounding the Brent Spence Bridge (BSB) Corridor Project.	Utilities (4.12.1)
		B-146-3	02/22/2024 - And there's been a lot of updates in the science of greenhouse gas emissions, of things like fine particulate matter.	The evaluation of greenhouse gases and climate change prepared for the supplemental Environmental Assessment followed the guidance issued by the Council on Environmental Quality using methodologies discussed and in consultation with the U.S. Environmental Protection Agency (USEPA). The analysis was conducted at a quantitatively high level using USEPA's Motor Vehicle Emission Simulator (MOVES). MOVES is USEPA's official model for state implementation plans and transportation conformity analyses and is listed by the U.S. Department of Transportation as the most common approach for modeling greenhouse gas emissions for transportation projects. The greenhouse gas emissions analysis was conducted using travel demand models for the project's approved certified traffic. The analysis concluded that greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	Particulate Matter (4.6.3) Emissions Burdens Analysis (4.6.5) Greenhouse Gases and Climate Change (4.7)
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	



ID	Name	No.	Comment	Response	Reference ¹
				The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for particulate matter that is 2.5 micrometers or less in diameter (PM2.5). As such, PM2.5 conformity requirements do not apply, and additional PM2.5 analysis is not required for Refined Alternative I (Concept I-W).	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no-build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
		B-146-4	02/22/2024 - I have heard no mention of microplastics and other things that are shed from tires on highways and what that's doing to the communities there.	The design, construction, and maintenance of the BSB Corridor Project will be in accordance with applicable water quality regulations. Although there are no current regulations based on microplastics, ODOT and KYTC are working to improve water quality through stormwater runoff management across all projects in their respective states. KYTC and ODOT have incorporated environmental commitments into the project that require the resident engineer and contractor to develop best management practices (BMPs) prior to onsite activities to	Utilities (4.12.1)



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				ensure continuous erosion control throughout the construction and post-construction period.	
		B-146-5	02/22/2024 - I'm not sure why there's not more consideration of sound walls all through the West End and Queensgate and even Camp Washington where communities already been cut off and polluted by highway expansion.	ODOT evaluated noise for Refined Alternative I (Concept I-W) and documented the results in a <i>Noise Analysis</i> <i>Report</i> (October 2023). The Ohio analysis identified noise impacts at three isolated residences in the Camp Washington neighborhood; however, the impacted residences are spaced over a distance of about 2,000 feet. Noise mitigation for isolated residences is not cost effective per ODOT's noise policy, and noise mitigation is not proposed for these residences. The Ohio analysis also identified noise impacts at the Cincinnati Job Corps, which is in the Queensgate neighborhood. Noise barriers were evaluated for the Cincinnati Job Corps but were not found to be cost effective per ODOT's noise policy; therefore, noise mitigation is not proposed in this location. The Ohio noise study found five noise barriers to be feasible and reasonable per ODOT's <i>Analysis and</i> <i>Abatement of Highway Traffic Noise Policy Statement</i> (ODOT noise policy), and ODOT is proposing noise barriers to mitigate noise impacts in the West End neighborhood. In addition, ODOT has committed to constructing 57-inch barriers on the Liberty Street, Findlay Street, and Bank Street bridge parapets. These barriers will be 15 inches taller than standard ODOT bridge barriers, and the increased height will further reduce tire pavement noise. In accordance with the ODOT <i>Analysis and Abatement of Highway Traffic Noise Policy</i> <i>Statement</i> , ODOT will conduct noise abatement public involvement with property owners and tenants who would benefit from proposed noise barriers in Ohio during the detailed design phases of the project.	Noise - Ohio (4.8.2)
		B-146-6	02/22/2024 - So, yeah, I love the comment earlier about how we can do more to go above and beyond in these communities. We need to reconnect these communities while we have the chance, you know, connecting things like	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing	Purpose and Need (2.)



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			the streetcar to the, across the Ezzard Charles Bridge. I like that idea. We've talked to ODOT about doing things like skate parks that connect	local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75.	Additional Refinements (3.3)
			communities and get young kids in, and we can make 'em green, but there doesn't really seem to be a ton of interest in that.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor. Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage	Neighborhood and Community Cohesion (4.1.2) Public Hearing (5.5)
				improvements. In consideration of feedback provided by the City of Cincinnati Department of Transportation and Engineering, ODOT will design and construct the non-deck components for the new Ezzard Charles Drive bridge over I-75 to not preclude potential future streetcar route expansion. The design modification will not change the footprint or the environmental impacts of the project.	
				ODOT has met with representatives from the Cincinnati City Manager's Office, the Cincinnati Skate Park Project, and Cincinnati Center City Development Corporation (3CDC) to discuss potential skate park opportunities throughout the city as part of separate efforts that are not related to the BSB Corridor Project. ODOT will continue to work with the City and the Cincinnati Skate Park Project	



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				as part of its routine governmental interactions within the City of Cincinnati.	
		B-146-7	02/22/2024 - I only heard that there's very little mention of what's gonna happen with Queensgate Playfield. It sounds like that's kind of a done deal, but it's still gonna have impacts for the kids that play there right now. So how do we go above and beyond and build more play areas, more parks for the kids that live in these neighborhoods that are gonna be impacted beyond just, you know, buying a piece of the property and reconfiguring the baseball diamond.	The refinements incorporated into Refined Alternative I (Concept I-W) do not change the impacts to the Queensgate Playground and Ball Field that were identified in the 2012 Environmental Assessment and Finding of No Significant Impact. In 2014, ODOT acquired 0.72 acre of permanent right-of-way and easement from the Queensgate Playground and Ball Field, including outfield areas for the ball fields that existed at that time. Trees and shrubs along the southern edge of the park will also be removed during the construction of the highway, retaining wall, and a proposed noise barrier. Impacts were mitigated by compensating the City of Cincinnati for the land, relocation of recreational facilities, preparation of construction plans for the ball field reconfiguration, and construction monitoring of the mitigation. A noise barrier is also proposed to mitigate noise impacts. If noise public involvement concludes that a noise barrier will not be built, then ODOT has committed to installing limited access right-of-way fencing along the park and highway boundary.	Queensgate Playground and Ball Field (4.13.7)
		B-146-8	02/22/2024 - This is a once in a lifetime opportunity for the ODOT and for Kentucky Department of Transportation and both the states to, to actually improve neighborhoods that were damaged by highways in the past.	Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity	Future Design Refinements (3.7)



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				across the interstate; and building the project with a context sensitive design that fits within the community.	
B-147	Laber, Ryan	B-147-1	02/22/2024 - I'm calling in to make a comment on part of Bridge Forward Cincinnati. Of course, we are a pro-build, pro- bridge group, and as such, we're asking for basically a good working partnership with ODOT and the whole project team. And so in that spirit, I got kind of two comments to make. The first one is, this summer Bridge Forward hosted a public meeting at Union Terminal, and 150 people attended for this meeting. We flew in national experts to share their perspectives about the project. The experts included Fred Wagner, who is the former Chief Counsel at Federal Highway Administration during the Obama presidency, and is now a partner at Venable, LLP and Environmental Law Firm in D.C. We also flew in Gloria Jeff, who is the current livability director at Minnesota DOT, and the former deputy administration. We extended invitation to the project team and to the current local Federal Highway Administration folks, but were disappointed that nobody attended the public meeting that we hosted.	The meeting referenced by the commenter was privately sponsored and was not an official project meeting for the Brent Spence Bridge (BSB) Corridor Project. As such, representatives from FHWA, KYTC, and ODOT did not attend.	N/A
		B-147-2	02/22/2024 - Secondly, we understand the project team is open to hearing public comments or comments on the project from Cincinnati's elected officials about the Brent Spence Project. But in talks with elected officials just this week, I've heard their understanding from ODOT that the Bridge Forward proposal would necessarily shut down I-75 for a year or add a half a billion dollars in project costs. And that's their current understanding. That's not our understanding. We haven't seen those kind of comments in	KYTC and ODOT were not parties to the conversations referenced by the commenter; therefore, no response, other than to document the comment as received, can be provided. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community	Purpose and Need (2.) Alternatives (3.) Future Design Refinements (3.7) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
			writing. So as a pro-bridge group, a pro-build group, we're asking for a, a productive partnership. Those are my comments.	benefits. Features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices.	Public Comments (5.1.1)
				Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing BSB for local traffic as part of the collector-distributor roadway system and a new double- decker companion bridge to the west for through (interstate) traffic. In addition, performance-based design principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District.	
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public	



ID	Name	No.	Comment	Response	Reference ¹
				investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary (January 2024)</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
B-148	Daniel	B-148-1	02/22/2024 - I'm a local resident, and my question is, well, first I received a flyer in the mail that says, investing in local communities, growing America's economy. And my question is, how exactly are you investing in the local communities? And for the record, I do not think that grant money is investing in local communities if that grant money is used for paying for damages that you are creating. That's my comment.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several refinements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown Cincinnati area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; incorporating aesthetic treatments throughout the corridor; and incorporating drainage improvements. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion.	Purpose and Need (2.) Neighborhood and Community Cohesion (4.1.2)



ID	Name	No.	Comment	Response	Reference ¹
B-149	Anthony	B-149-1	02/22/2024 - I oppose the, the bridge project entirely because I think it's a waste of taxpayer dollars in the first place.	The commenter's opposition to the Brent Spence Bridge (BSB) Corridor Project has been included in the project record.	N/A
		B-149-2	02/22/2024 - But given that you're hell on, on creating a, a companion bridge, you owe it to, to the local residents to do your absolute finest work and collaborate with the groups that have put in a, a really unreasonable amount of time, like Bridge Forward. I'm not part of the group, but they're an amazing group. It's, it's incredible to see what they've been able to put together, honestly, in spite of ODOT, which is really sad because ODOT should be a leader in transportation, but unfortunately, they're kind of, they're kind of just a, a leader for their own benefit right now, unfortunately, it seems like.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. Features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices. Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing BSB for local traffic as part of the collector-distributor roadway system and a new double- decker companion bridge to the west for through (interstate) traffic. In addition, performance-based design principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District.	Purpose and Need (2.) Alternatives (3.) Future Design Refinements (3.7) Travel Patterns and Access (4.1.4) Public Comments (5.1.1)

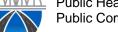


ID	Name	No.	Comment	Response	Reference ¹
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community. As part of the public involvement conducted for the	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary (January 2024)</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
		B-149-3	02/22/2024 - So, I hope that ODOT will kind of wake up, move toward mass transit rather than dirty transit, which is what this is. It's an expansion of, of over-reliance on private vehicles, on trucking rather than, than rail transit and, and it's a mistake.	In 2004, the Ohio-Indiana-Kentucky Regional Council of Governments and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, neither expanded transit routes nor passenger rail would meet the project purpose	Purpose and Need (2.) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				and need, and they are not considered to be reasonable alternatives for the BSB Corridor Project.	
				The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-149-4	02/22/2024 - So, I hope you'll, I hope you'll work with toward the bridge, the bridge forward plan, because that's the best you can do with, with a bad idea.	During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	Future Design Refinements (3.7)
B-150	Lance, Marsha	B-150-1	02/22/2024 - I am a Newport, Kentucky resident. I'm happy to see a project move forward that would improve traffic flow and in	KYTC and ODOT have incorporated environmental commitments into the project to protect streams and rivers. Best management practices (BMPs) will be	Streams and Rivers (4.2.2)





ID	Name	No.	Comment	Response	Reference ¹
			access to the transportation areas around Northern Kentucky and Cincinnati. My only concern, I'm not an informed citizen per se, I haven't read the documentation, but I'm hoping that there are mitigations that are being put in place to protect the water quality levels of the Ohio River throughout the protection, throughout the production phase where we are gonna have a lot of things, I think I, I assume, dropping into the river and settlement and sediment and, and the, the disruptions to the habitats you've mentioned. So, I just hope that along the way, some of the public information that will come out will be the plans to address water quality issues for the river and the river habitat. And then also if there are funds available, it would be nice to see cleanup and improvement of the river along both sides of the river because it is such a lovely area for the public to gather on both sides. We have parks down there near the water, places to walk, and I think the most of the citizens in the area would like to see those kinds of opportunities expanded and improved and enhanced for, you know, physical wellbeing of being outdoors in our outdoor spaces. And the river is certainly one of those important spaces to us. Thank you to all and everybody who's working on this project. I'm cheering you on and hoping that everyone does their very best for the communities that are involved in this.	developed by the resident engineer and contractor prior to onsite activities to ensure continuous erosion control throughout the construction and post-construction period. In addition, areas of the stream banks that are disturbed by construction will be reseeded, and new grass will be established. Under existing conditions, all of the runoff from the I-71/ I-75 corridor in Kentucky flows into a combined sewer system, creating flooding in surrounding areas and contributing to overflow events. While only runoff from new impervious area is required to be separated, KYTC has committed to separating all interstate runoff from the existing combined sewer system. Modeling shows that these separation efforts will substantially reduce the volume flowing into the combined sewer system, reducing the frequency of combined sewer overflows into surrounding waterways. In Ohio, existing combined sewers flood Mill Creek with sewage during extreme rain events. ODOT is coordinating with the Metropolitan Sewer District to build storm sewers that will separate I-75 runoff from combined sewer overflows into Mill Creek. ODOT will also provide BMPs to address water quality treatment requirements in Ohio. These measures are anticipated to result in long-term improvements to water quality in the project area. Impacts to water quality will also be addressed as part of the Section 401 Water Quality Certification and the National Pollutant Discharge Elimination System permitting processes. Refined Alternative I (Concept I-W) will disturb or remove 90 acres of forested habitat. The definition for forested habitat includes a wide range of trees and shrubs, some as small as 3-inches in diameter, and it also includes dead trees that are still standing. A large portion of the forested habitat impacted by Refined Alternative I (Concept I-W) is located within the existing right-of-way, is	Terrestrial Habitat (4.2.3) Utilities (4.12.1) Permits (4.15)



ID	Name	No.	Comment	Response	Reference ¹
				near to the existing interstate, and is near or within highly developed urban areas.	
				The removal of up to 90 acres of forested habitat will result in the loss of potential foraging or maternity areas for the Indiana bat, the northern long-eared bat, and the tricolored bat. The removal of up to 4.38 acres of riparian habitat will result in the loss of potential foraging areas for the gray bat. Measures incorporated into the project to minimize and mitigate impacts to threatened or endangered bat species will also minimize and mitigate impacts to terrestrial habitat. These include minimizing tree removal and mitigating habitat loss in Kentucky through a contribution to the Imperiled Bat Conservation Fund. The Imperiled Bat Conservation Fund will offset project-related impacts to terrestrial habitats by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts.	
B-151	Stu, Mahlin	B-151-1	02/22/2024 - This new bridge will be a gateway to Ohio and the North, as well as a gateway to Kentucky and the South. It should be a SPECTACULAR structure a bridge to put Greater Cincinnati on this list: https://www.architecturaldigest.com/gallery/mo st-beautiful-bridges-in-the-world	KYTC, ODOT, and the project Aesthetics Committee are coordinating the design of the new companion bridge to ensure that it is an iconic, aesthetically pleasing structure. Refined Alternative I (Concept I-W) incorporates flexibility in the bridge types to allow the progressive design-build team to pursue innovative and cost-effective designs to the greatest extent possible. The bridge types for Refined Alternative I (Concept I-W) are broadly described as an "arch bridge" and a "cable-stayed bridge."	Visual Resources (4.9)
				KYTC and ODOT will determine the final bridge type for the new companion bridge based on a technical evaluation performed by the design-build team. Once the bridge type is determined, information regarding the decision will be made available to the public, and the project Aesthetics Committee will be engaged to provide feedback on the aesthetic elements of the new companion bridge and the existing Brent Spence Bridge. KYTC and ODOT will also continue to engage the project	



ID	Name	No.	Comment	Response	Reference ¹
				Aesthetics Committee for final confirmation of the aesthetic treatments included in Phase III of the project.	
B-152	Crane, Ryan	B-152-1	02/22/2024 - On January 25, 2023, I was among a number of signatories to a letter submitted to the Federal Highway Administration regarding deficiencies in the environmental approval process for the Brent Spence Corridor Project. A copy of this letter is available here: https://www.sustainablecincy.org/news/concern s-over-brent-spence-corridor-projects- compliance-with-civil-rights-and-environmental- justice-regulations. I wish to reiterate the concerns outlined in that letter and incorporate that letter as public comment on the Supplemental Environmental Assessment (SEA).	A copy of this comment was also submitted on March 8, 2024. The concerns raised in the January 2023 letter from the Coalition for Transit and Sustainable Development were addressed during the project's National Environmental Policy Act (NEPA) review. Details regarding how those concerns were addressed were provided in the supplemental Environmental Assessment (EA) and the <u>Public Involvement Summary</u> (January 2024). A copy of the Coalition for Transit and Sustainable Development letter is also provided in Appendix I of the <u>Public</u> <u>Involvement Summary</u> .	Public Comments (5.1.1)
		B-152-2	02/22/2024 - The Supplemental Environmental Assessment fails to adequately address and resolve serious deficiencies in the submissions provided for this project under the National Environmental Policy Act (NEPA), and the Brent Spence Corridor Project requires a full Environmental Impact Study at minimum. Allowing this project to proceed under a Finding of No Significant Impact (FONSI) with supplemental assessments is not appropriate. It is a violation of NEPA for an agency to fail to rigorously consider and objectively evaluate all reasonable alternatives to the proposed project. The determination of reasonable alternatives is considered a critical part of the NEPA process since "one obvious way for an agency to slip past the strictures of NEPA is to contrive a purpose so slender as to define competing 'reasonable alternatives' out of consideration (and even out of existence)."	In accordance with the NEPA, an EA was originally prepared for the Brent Spence Bridge (BSB) Corridor Project in the Commonwealth of Kentucky and the State of Ohio in March 2012. A Finding of No Significant Impact (FONSI) was approved by FHWA on August 9, 2012. The alternatives evaluation for the BSB Corridor Project was documented in the 2012 EA and remains applicable to the project. Reevaluations completed in 2015 and 2018 concluded that the 2012 FONSI remained valid. The supplemental EA has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional NEPA reevaluation and coordination efforts that have occurred since the 2012 EA/FONSI. The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not	Introduction (1.) Development of Refinement Concepts (3.2) Additional Refinements (3.3) Project Refinements (Appendix A)

ID	Name	No.	Comment	Response	Reference ¹
			Simmons v. United States Army Corps of Engineers, 120 F.3d 664, 666 (7 th Cir. 1997). The existence of a viable but unexamined alternative renders the environmental review inadequate. See Envtl. Def. Ctr. V. Bureau of Ocean Energy Mgmt., 36 F.4 th 850, 877 (9 th Cir. 2022).	expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. In addition, detailed descriptions of the refinements incorporated into the project since the 2012 EA/FONSI are provided in the supplemental EA, and further supporting documentation is provided in its appendices.	
				The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	
		B-152-3	02/22/2024 - The submissions must also include a full and fair discussion of any irreversible or irretrievable commitment of resources which would be involved in the proposed action. In this case, the proposed action involves the expenditure of around \$4 billion in state and federal funds. While the SEA includes a cost analysis, it does not include a cost analysis comparing the ODOT preferred option with the reasonable, viable, but unexamined alternative of tolling the bridge in a no-build scenario. This is presumably because such a comparative cost analysis would demonstrate the clear superiority of the roadway pricing option from the standpoint of prudent management of taxpayer dollars. The avoidance of this comparison is not a full and fair discussion of the irretrievable commitment of public resources.	Applicable regulations do not require the supplemental EA to include separate discussion of irreversible or irretrievable commitments of resources or comparative cost analyses. In any event, the supplemental EA updates relevant information from the 2012 EA/FONSI, provides detailed discussion of potential impacts of Refined Alternative I (Concept I-W), and includes extensive environmental commitments outlining minimization and mitigation measures for unavoidable impacts. Tolling the existing BSB is not considered to be a reasonable alternative for the BSB Corridor Project, and the project does not include tolling.	Introduction (1.) Funding (1.2.1)

BRENT SPENCE

ID	Name	No.	Comment	Response	Reference ¹
		B-152-4	 02/22/2024 - Tolling the Brent Spence Bridge in a No-Build Scenario is a Viable and Reasonable Alternative. Tolling is frequently used to finance infrastructure projects of this type. Tolling is therefore a reasonable and viable option on the Brent Spence Bridge, and tolling was in fact previously studied as a financing mechanism for this exact project. It was also used to fund a nearly identical project in Louisville. Any form of roadway pricing can be expected to decrease traffic relative to the toll-free alternative, and the FHWA itself promotes roadway pricing as a way to manage the waste associated with traffic congestion. According to the FHWA Center for Innovative Finance Support, authority to toll a currently toll-free bridge exists under 23 U.S.C. 129(a)(1)(E) if the bridge is reconstructed, and this authority applies to bridges both on and off the Interstate system. "Reconstruction" includes major work to correct major safety defects and to improve the functional operation of the facility. Local government entities, including individual cities, may also seek tolling authority under the FHWA Value Pricing Pilot Program. While Kentucky law prohibits tolling the bridge as part of a financing plan or development agreement, it does not seem possible for Kentucky law to prohibit tolling of the Brent Spence Bridge or its approaches in the state of Ohio. It also seems that permitting the tolling of the Louisville Ohio River Bridges project while prohibiting tolling of the Ohio – Kentucky river crossing might be discriminatory from an interstate commerce perspective. The Kentucky law directly favors in-state Kentucky logistics firms and northern Kentucky commuters who work in southwestern Ohio. 	Previous tolling studies conducted by KYTC and ODOT indicate tolling the BSB Corridor would not meet the project purpose and need due to unmet travel demand. In addition, tolling would cause traffic diversion in local communities. The studies showed increased traffic primarily on the bridges crossing the Ohio River in the immediate vicinity of the cities of Covington, Cincinnati, and Newport with lower traffic diversion to 1-275. During previous tolling studies for the BSB Corridor Project, local interests concentrated primarily in northern Kentucky expressed concern about the impacts of tolling and associated traffic diversion. In response to these concerns, the Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. Therefore, tolling the existing BSB is not considered to be a reasonable alternative for the BSB Corridor Project, and the project does not include tolling. Previous study efforts related to tolling are posted on the "Documents" page of the project website under the years 2013, 2014, and 2015.	Funding (1.2.1)

ID	Name	No.	Comment	Response	Reference ¹
			When tolling is considered as a financing option for infrastructure projects, agencies have the ability to commission an investment grade analysis (IGA) in order to forecast toll revenues which will pay for the bonds used to fund the project. These IGA's tend to be rigorous as they are used to sell a bond product to sophisticated investors. According to Joe Cortwright at City Observatory:		
			Financial markets and the federal government, who are asked to loan money up-front (with a promise to be repaid by future tolls) simply refuse to believe state highway department traffic forecasts. Instead, they insist that states pay for an "investment grade" traffic and revenue forecast. You can't sell toll-backed bonds on private financial markets, and you can't even apply for federal TIFIA loans, without first getting an investment grade forecast. ("Flying blind: Why leaders need an investment grade analysis." Joe Cortwright, City Observatory 1/6/2022)		
			If an investment grade analysis is required for projects involving debt-financing with tolls because state DOT traffic forecasts are unreliable, it is unreasonable for taxpayers to rely on these DOT models just because the project is funded solely with taxpayer money as an equity investment without promise of future repayment. Accepting a lesser degree of rigor in fully taxpayer-funded projects serves only to mislead the taxpayer as an unsophisticated "equity investor" in the infrastructure project. Why are bond financiers treated differently than the average American taxpayer?		
			These IGA's routinely predict a much more dramatic impact of price on traffic volume than that impact which is predicted by state DOT models. Pricing is therefore much more		



ID	Name	No.	Comment	Response	Reference ¹
			effective at controlling congestion than state DOT's would have the general public believe. According to Cortwright, "As a result, investment grade analyses invariably predict lower levels of traffic than the models used by state highway departments. Because traffic levels are lower, tolls have to be higher to produce any given amount of revenue." It is this impact which would explain the result witnessed by KYTC in Louisville, where the doubling of lanes across the Ohio River with the addition of tolls resulted in the destruction of approximately half of the pre-construction traffic volume – an egregious mismanagement of taxpayer funds. Perhaps KYTC could examine the data from their project in Louisville to inform their approach to the Brent Spence Corridor Project.		
		B-152-5	02/22/2024 - If state DOT traffic models are deemed unreliable for purposes of toll-related financing, they should be considered unreliable for purposes of project design and determination of need. The existence of a different modeling process referred to as "investment grade" indicates that the data or assumptions regarding future traffic volumes provided by ODOT and KYTC in their non- investment grade analysis are unreliable or incorrect. This is because an alternative, superior and more accurate method of analysis clearly exists. All data and assumptions submitted to the federal government and to the general public should be investment grade. Describing an analysis as "investment grade" is just another way of saying that the analysis is "rigorous." Conversely, a non-investment grade analysis is not rigorous. The choice of a non- investment grade analysis and the omission of the alternative investment grade type, without a	Certified traffic projections for the BSB Corridor Project were prepared according to the most current state and federal requirements, guidelines, and practices. The certified traffic projections were utilized to prepare an <u>Interchange Modification Study Addendum</u> (December 2023), which concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods. Previous tolling studies conducted by KYTC and ODOT indicate tolling the BSB Corridor would not meet the project purpose and need due to unmet travel demand. These previous studies, which include toll finance and traffic modeling scenarios, are posted on the "Documents" page of the project website under the years 2013, 2014, and 2015.	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
			clear explanation as to why an inferior method was chosen, may be considered arbitrary or capricious. Other modeling techniques are also available, such as dynamic traffic assignment, which purports to be more accurate and precise in modeling congested traffic networks. The agencies must explain why these other techniques have not been used to inform decision-making for this project. They must also explain why their modeling projects traffic volumes well above the capacity of the bridge in a no build scenario.		
			Below is a graph compiling publicly available traffic forecasting data provided by the state agencies, compared to the most recent actually measured traffic volumes. As the saying goes in modeling, "garbage in, garbage out." The state agencies seem to be providing the public and the federal government with "garbage out." "To take the required "hard look" at a proposed project's effects, an agency may not rely on incorrect assumptions or data in an EIS. 40 C.F.R. § 1500.1(b) ("Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA.")." Native Ecosystems Council v. U.S. Forest Serv, 418 F.3d 953, 964 (9 th Cir. 2005) "Where the information in the initial EIS was so incomplete or misleading that the decision maker and the public could not make an informed comparison of the alternatives, revision of an EIS may be necessary to provide a reasonable, good faith, and objective presentation of the subjects required by NEPA." Animal Defense Council v. Hodel, 840		
			F.2d 1432, 1439 (9 th Cir. 1988) [The comment included a graph with the years 2005 to 2050 along the horizontal axis and		



ID	Name	No.	Comment	Response	Reference ¹
			traffic volumes from 120k to 250k along the vertical axis.]		
			Data available here and from the Coalition for Transit and Sustainable Development upon requesaps.arcgis.com/stories/7f73496d7e5b49 5ab8e07742c0311cc0.		
			The basic economic principles at play here are again summed up by Cortwright in his examination of a project in the Pacific Northwest:		
			The Oregon and Washington highway departments prepared traffic and toll estimates for the Columbia River Crossing's Final Environmental Impact Statement published in 2011. Those estimates were that the I-5 bridges would carry 178,000 vehicles per day in 2030, and that minimum tolls would be \$1.34 to pay for about one-third of the cost of the project. The Investment Grade Analysis for this project, prepared by CDM Smith on behalf of the two agencies in 2013 estimated that in 2030, the I-5 bridges would carry just 95,000 vehicles per day in 2030, and that tolls would be a minimum of \$2.60 each way in order to cover a third of project costs. In short, the initial highway department estimates overstated future traffic levels by double, and understated needed tolls by half.		
			The starkly different figures in the investment grade analysis called into question the size of the project, which was predicated on the exaggerated highway department forecasts. If a tolled bridge would carry dramatically fewer vehicles than the existing bridge, there was no justification for building an expensive wider structure and approaches. The money spent expanding capacity on the bridge would be wasted because fewer vehicles would use it.		



ID	Name	No.	Comment	Response	Reference ¹
			This dynamic is essentially identical to the result observed in the Louisville project. Why KYTC asks us to repeat their Louisville mistake in Cincinnati is unclear.		
		B-152-6	02/22/2024 - The stated purpose of the Brent Spence Corridor project includes a number of different objectives, including addressing congestion and improving geometric deficiencies. However, as noted above, it is an error to so narrowly define the project scope such that only one solution is possible. For example, it is conceivable that the congestion component of this project could be managed with, in all likelihood, a relatively modest toll, and the revenue from that toll used to finance correction of geometric deficiencies or other areas of DOT concern. The toll price could also be adjusted to reduce traffic volume to the point that the number of travel lanes on the Brent Spence Bridge could be reduced. This would allow the replacement of the original shoulders. Such is the power of market forces. "Rigorous analysis" of the effect of toll price on traffic volumes in a no-build scenario would be part of the "objective evaluation" of reasonable alternatives to the proposed BSCP. The American taxpayer deserves as much rigor as do sophisticated bond investors when it comes to the deployment of billions in taxpayer dollars. The objective evaluation should occur through the use of an Investment Grade Analysis, which would help decision makers assess whether this project is even necessary.	The purpose and need for the BSB Corridor Project is unchanged from the approved 2012 EA/FONSI, is adequately supported, and does not preclude consideration of a reasonable range of alternatives. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Tolling the existing BSB is not considered to be a reasonable alternative for the BSB Corridor Project, and the project does not include tolling.	Funding (1.2.1) Purpose and Need (2.)
B-153	Hunt, Laura	B-153-1	02/22/2024 - This new bridge will serve the American economy for decades. It should be the best in every aspect and a source of	The commenter's support for the Brent Spence Bridge Corridor Project has been included in the project record.	N/A



ID	Name	No.	Comment	Response	Reference ¹
			regional pride. Delays by regulatory and climate interests should not be tolerated.		
B-154	Anonymous	B-154-1	02/22/2024 - Will the cut in the hill in NKY be straightened out? Unless police enforce trucks using the I275 highways, we will still have multiple accidents no matter where the bridge is built or reshaped.	Refined Alternative I (Concept I-W) will provide approximately the same grade, or steepness, along the area known as the "cut-in-the-hill." Refined Alternative I (Concept I-W) provides six lanes for northbound and six lanes for southbound interstate traffic through the "cut-in- the-hill." Traffic operational analyses prepared for Refined Alternative I (Concept I-W) include consideration of roadway grades on various roadway sections. The traffic operational analyses, which are documented in an <i>Interchange Modification Study Addendum</i> (December 2023), concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations along the area known as the "cut-in-the-hill" for all projected trips in the project area through the year 2049. In 2005, KYTC and ODOT conducted a <i>Feasibility and Constructability Study of the Replacement/Rehabilitation of the Brent Spence Bridge</i> . Among other considerations, the study evaluated the impacts and costs of prohibiting all through trucks on the existing Brent Spence Bridge (BSB). The study concluded that the issue of diverting trucks from the existing BSB has regional implications in terms of increased traffic on a number of travel corridors, and such prohibitions would increase costs to the users. In 2007, and as part of a separate study, the Ohio- Kentucky-Indiana Regional Council of Governments (OKI), the Metropolitan Planning Organization (MPO) for the area, completed a <i>Brent Spence Bridge Truck Ban Analysis</i> . A ban on through trucks on the northern Kentucky portion of I-71/I-75 was found to have no substantial benefits. The volumes of diverted traffic were relatively small compared to the overall volume, and the impact on severe crashes within the system was minor. Furthermore, operating costs to the trucking industry would negatively impact the region. The deployment of a truck ban would also present difficulties in terms of enforcement. Therefore, diverting truck traffic would not	Purpose and Need (2.) Design Criteria (3.4) Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
				be effective and is not considered to be a reasonable alternative for the BSB Corridor Project.	
B-155	trainersbelt	B-155-1	02/22/2024 - Public comments	The comment was considered unclear, and no response, other than to document the comment as received, can be provided.	N/A
B-156	Anonymous	B-156-1	02/22/2024 - Listening to the virtual presentation, Jodi Heflin is talking about taking property, reducing park space & disrupting bats. Where are you relocating the bats? I only heard that you were throwing money at groups that support bats	Refined Alternative I (Concept I-W) incorporates several measures to minimize and mitigate effects on the Indiana bat, gray bat, the northern long-eared bat, little brown bat, and tricolored bat. Ohio and Kentucky follow separate policies, programmatic agreements, and regulations concerning these species; therefore, each state will incorporate separate minimization and mitigation measures.	Threatened or Endangered Species (4.2.4)
				In Kentucky, the mitigation measures include providing a contribution to the Imperiled Bat Conservation Fund, which will offset project-related impacts to terrestrial habitats by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts. Tree removal in Kentucky will be minimized, and no tree removal will occur from June 1 to July 31 when federally listed bats may be using those habitats. In addition, measures to protect stream areas in Kentucky will be implemented both during and after construction.	
				In Ohio, the mitigation measures include avoiding tree removal in excess of what is required to implement the project safely. No tree removal in Ohio will occur from April 1 through September 30, when federally and state listed bats may be using those habitats. Ohio standards and specifications related to lighting; dust control; and water quality, wetland, and stream protection will also minimize and mitigate effects to federally and state listed bat species.	
				The supplemental Environmental Assessment presents assumed potential habitat for threatened and endangered bat species. Because trees will only be removed during	



ID	Name	No.	Comment	Response	Reference ¹
				times of year when federally and state listed bats are not expected to be utilizing those habitats, relocation of bat species will not occur. Relocating bats may cause more harm and could result in additional take of these species.	
B-157	Johns, Steve	B-157-1	02/22/2024 - Thank you for the opportunity to go on the record opposing the approval of the amended EIS for the Brent Spence Bridge project. Please find below my comments that I request that you include in the record.	The commenter's opposition to the Brent Spence Bridge Corridor Project has been included in the project record.	N/A
		B-157-2	 02/22/2024 - My daughter is a currently a senior at Walnut Hills High School and she might go to college at UC - what if, for argument's sake, she started dating a Beechwood High School boy and was trying to get from the football game back to UC. The array of signs she would encounter as she was heading north from Kyles Lane would be more than challenging for a new driver. Google maps would be yelling at her to merge across three lanes of traffic in a mile to stay on I-75. And she would be trying to get across not just regular traffic but three lanes of semis putting on their Jake breaks as they are barreling down the cut in the hill. Please rethink this project so my daughter doesn't die after seeing her boyfriend score a touchdown. My aunt lives in Detroit. Sometimes she likes to head south to get a break from the Michigan winter. She likes to drive in the right lane to stay at a safe speed. When she passes the western hills viaduct she will see a perplexing array of signs. She will have to cut across three lanes of traffic - full of semis - and speeding left lane drivers trying to exit into downtown. 	The project will install new signing on I-71/I-75 throughout the project area. The design and locations of highway signs will be finalized during detailed design and in accordance with current design standards and guidelines. The traffic operational analyses, which are documented in an <u>Interchange Modification Study Addendum</u> (December 2023), did not identify extensive weaving maneuvers associated with the design of Refined Alternative I (Concept I-W). Refined Alternative I (Concept I-W) will improve safety on the roadways in the project area by including measures to reduce congestion-related crashes. In addition, the collector-distributor roadway system will improve safety by separating through and local traffic and keeping them separate for longer distances, thus reducing weaving movements that increase the risk of crashes. The removal of left-hand exits and other design deficiencies such as substandard shoulders are also expected to improve safety and reduce crashes by further reducing weaving movements and by providing a larger buffer for vehicles. The <u>Interchange Modification Study Addendum</u> documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's <u>Interactive Highway Safety Design Model</u> .	Design Criteria (3.4) Traffic (3.8) Refined Alternative I (Concept I-W) and Purpose and Need (3.9)

ID	Name	No.	Comment	Response	Reference ¹
		B-157-3	02/22/2024 - I can't speak as personally to the former residents of the Kenyon Barr neighborhood whose lives were shattered when I-75 was first built where their neighborhood used to be located, but I can say that this proposed project will decrease the life spans of those who live in adjacent neighborhoods like the West End. Please rethink this project so that the residents of the West End don't have to die before their time.	KYTC and ODOT evaluated the effects of Refined Alternative I (Concept I-W) on health burdens in disadvantaged communities in a <u>Socioeconomic</u> <u>Technical Report</u> (January 2024). The analysis concluded that Refined Alternative I (Concept I-W) will not further contribute to health burdens; rather, Refined Alternative I (Concept I-W) may result in potential better health outcomes for those with asthma, diabetes, heart disease, or low life expectancy due to improved access to healthcare destinations, improved options for active transportation, and improved air quality due to improved traffic flow and reduced vehicle idling. Refined Alternative I (Concept I-W) was evaluated for cumulative effects. When considered with other past, present, and reasonably foreseeable projects, Refined Alternative I (Concept I-W) is expected to result in a minor contribution to cumulative impacts.	Disadvantaged Communities (4.1.9) Cumulative Effects (4.10.2)
		B-157-4	02/22/2024 - The accidents, injuries and deaths that you anticipate this design reducing will actually go up given the high speeds the project will allow.	The <u>Interchange Modification Study Addendum</u> documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's <i>Interactive</i> <i>Highway Safety Design Model</i> . The analysis concluded that Refined Alternative I (Concept I-W) will reduce crashes on the existing BSB, the I-71/I-75 mainline in Kentucky, the I-75 mainline in Ohio, and locations of notable changes incorporated into Refined Alternative I (Concept I-W).	Traffic (3.8)
		B-157-5	02/22/2024 - Apart from these flaws in the design, the EIS from 2012 can't just be "updated" given the changes we have seen in the past decade. Remote work is here and autonomous vehicles are on the horizon. The new bridge will be technically obsolete before it is completed. A completely new environmental document is needed before the FHWA can authorize construction of the project.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to	Introduction (1.)



ID	Name	No.	Comment	Response	Reference ¹
				provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	
B-158	Tussey, Olivia	B-158-1	02/22/2024 - Hello Governor. My name is Olivia Tussey- I'm actually [REDACTED] goddaughter, so I met Winnie a handful of times before they gave her to your family! I'm reaching out in hopes to call on you to get the Transportation Cabinet to reevaluate the Brent Spence Bridge plan. I'm a Lexington native who is in the Masters of Community Planning program at the University of Cincinnati (living in northern Kentucky near Bellevue now), and I plan to go into transportation planning. I am particularly passionate about active transportation and transit, and how building up those systems can help us reach sustainability goals and build stronger communities. I have been incredibly disappointed to find out that at the same time that the federal and state governments say they are working toward fewer carbon emissions, transportation engineers are yet again pushing forward a project that expands an inherently broken transportation system, under the time-and- again disproven argument that adding more lanes helps with congestion.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. The <u>Interchange Modification Study Addendum</u> (December 2023) concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods. KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. Greenhouse gas emissions (also called carbon dioxide equivalent emissions) were calculated from projected carbon dioxide, nitrous oxide, and methane gas emissions weighted according to the global warming potential of each gas as defined by USEPA in MOVES. Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050	Purpose and Need (2.) Traffic (3.8) Greenhouse Gases and Climate Change (4.7)



ID	Name	No.	Comment	Response	Reference ¹
				build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
		B-158-2	02/22/2024 - The environmental impact analysis for this project was completed over a decade ago. This is unacceptable; at the very least, an updated one must be undertaken before this project moves forward.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	Introduction (1.)
		B-158-3	02/22/2024 - ODOT and KTYC should investigate congestion pricing in a no-build scenario in their consideration of alternatives to this project. While Kentucky state law prohibits the use of tolling to finance an expansion project of this type ("a development agreement or financial plan"), no regulation exists which would prohibit the use of tolling for congestion relief in a no-build scenario. Use of tolling as a financing mechanism was used in a similar project in Louisville, and the presence of tolling resulted in a significant decrease in traffic	Congestion pricing is a form of tolling. Previous tolling studies conducted by KYTC and ODOT indicate tolling the Brent Spence Bridge (BSB) Corridor would not meet the project purpose and need due to unmet travel demand. In addition, tolling would cause traffic diversion in local communities. The studies showed increased traffic primarily on the bridges crossing the Ohio River in the immediate vicinity of the cities of Covington, Cincinnati, and Newport with lower traffic diversion to I-275. During previous tolling studies for the BSB Corridor Project, local interests concentrated primarily in northern Kentucky expressed concern about the impacts of tolling and	Funding (1.2.1)



ID	Name	No.	Comment	Response	Reference ¹
			across a previously un-tolled river crossing. Evidence in the field of urban planning, including direct experience in the state of Kentucky, supports the use of congestion pricing or tolling as a "reasonable alternative" to highway widening for congestion relief, and no consideration of this alternative has been made in the development of the BSCP. The Federal Highway Administration Office of Operations promotes congestion pricing as a "way of harnessing the power of the market to reduce the waste associated with traffic congestion."	associated traffic diversion. In response to these concerns, the Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. Therefore, congestion pricing (which is a form of tolling) in a no-build scenario is not considered to be a reasonable alternative for the BSB Corridor Project, and the project does not include tolling. Previous study efforts related to tolling are posted on the "Documents" page of the project website under the years 2013, 2014, and 2015.	
		B-158-4	02/24/2024 - With regard to the DOT claims of great need for greater truck traffic capacity, they rely on an outdated 2004 study/report. The actual traffic counts, indicate that traffic counts overall, have not been increasing as repeatedly projected by ODOT or KYTC. More congestion can't be solved with the current plan.	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT, KYTC, and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI). Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
				between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods. Traffic projections prepared during the preparation of the 2012 EA estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	
		B-158-5	02/22/2024 - There's a fundamental flaw in the design of the region's traffic network: all the traffic is funneled into one major route. As the ODOT Brent Spence project manager acknowledged years ago, "We could continue to build lanes on 75, but they would fill because of the nature of the traffic network in the region." In other words, this region cannot build its way out of the traffic congestion issues without fundamental changes in the design of the overall network or by investing in other modes such as bus, light-rail, and better biking/walking infrastructure.	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, neither expanded transit routes nor passenger rail would meet the project purpose and need, and they are not considered to be reasonable alternatives for the BSB Corridor Project. The Initiative concluded that a highway improvement project was necessary to address capacity issues on I-75, including the BSB Corridor. While the original findings of	Purpose and Need (2.) Travel Patterns and Access (4.1.4)

ID	Name	No.	Comment	Response	Reference ¹
				the Initiative called for four lane continuity in each direction on I-75, traffic analyses completed as part of ODOT's Millcreek Expressway and Thru the Valley projects determined that five lanes were needed south of the I-74/I-75 interchange. This change was approved by OKI. The BSB Corridor Project addresses the highway component of the Initiative by improving interchanges and providing the number of lanes previously approved by OKI.	
				Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. The transit component included in the Initiative must be developed and championed regionally, and ODOT and KYTC are ready to support this when it is advanced at a regional level.	
				Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the communities surrounding the project area. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental EA. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	



ID	Name	No.	Comment	Response	Reference ¹
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-158-6	02/22/2024 - I truly hope my message doesn't fall on deaf ears. As a 23 year old person, I am constantly dismayed by the state of the world and this project is proving to me and many others yet again that profit and outdated politics mean more to most people in power than the interests of the people and the dire need to do better for the future of the planet. I have much respect for you and your love for the state, even though I wish you could take more progressive stances on many topics. I desperately hope there is something you can do. If not, at least I gave it a shot. Thank you for hearing me out.	The supplemental EA was made available for public review on January 26, 2024, and a public comment period concluded on March 8, 2024. KYTC, ODOT, and FHWA will consider all comments received before making a final decision on the supplemental EA. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	Public Hearing (5.5)
B-159	Walpe, Paul	B-159-1	02/23/2024 - What is the reason to build a second bridge next to the present bridge, thus cramming an increasing traffic load onto an already overloaded section of highway, which, presently, endures difficult topography. Are you all sadists or have you never driven this section? I used to race cars and I felt more comfortable on a race track than I do driving on this section of I75.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum (December 2023)</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by	Project Description (1.1) Traffic (3.8) Refined Alternative I (Concept I-W) and Purpose and Need (3.9)



ID	Name	No.	Comment	Response	Reference ¹
				travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
				Refined Alternative I (Concept I-W) will construct a collector-distributor (C-D) roadway system between West 12 th Street/Martin Luther King (MLK) Jr. Boulevard in Kentucky and Ezzard Charles Drive in Ohio. A new 107-foot-wide double-decker companion bridge will be built to the west of the existing BSB, with all I-71 and I-75 traffic on the new bridge and all C-D traffic on the existing BSB. The new companion bridge will carry five lanes of combined southbound I-71 and I-75 traffic on the lower deck and five lanes of combined northbound I-71 and I-75 traffic on the upper deck. The existing BSB will be rehabilitated and reconfigured to carry three lanes of traffic on each deck as part of the C-D roadway system.	
				Placing interstate traffic on the new companion bridge and local traffic on the existing BSB as part of the C-D roadway system will improve safety by separating through and local traffic and keeping them separate for longer distances, thus reducing weaving movements that increase the risk of crashes. The removal of left-hand exits and other design deficiencies such as substandard shoulders are also expected to improve safety and reduce	



ID	Name	No.	Comment	Response	Reference ¹
				crashes by further reducing weaving movements and by providing a larger buffer for vehicles.	
		B-159-2	02/23/2024 - I'd like to be on a mail list.	This individual was added to the project mailing list and will receive future project updates.	Ongoing Public & Stakeholder Involvement (5.6)
B-160	Anonymous	B-160-1	02/23/2024 - If this project goes through, are the materials used going to be able to support future alternative transportation, such as a streetcar?	In consideration of feedback provided by the City of Cincinnati Department of Transportation and Engineering, ODOT will design and construct the non-deck components for the new Ezzard Charles Drive bridge over I-75 to not preclude potential future streetcar route expansion. The design modification will not change the footprint or the environmental impacts of the project.	Public Hearing (5.5)
B-161	Bibee, Bruce	B-161-1	02/23/2024 - Perhaps local governments should take a new look at street intersections. Local government already owns these pieces of property and the airspace above them - land that runs from the inside edge of the sidewalk, parkway if any, curb and gutter, and the street itself - including the underground portions of this area. Where two streets intersect, this is a substantial amount of land and typically already has built up infrastructure (meaning no environmental impact studies are typically needed to build additional infrastructure). Most traditional infrastructure was built bit-by-bit on an as needed basis with little attention paid to how these bits might interact - especially since in many cases different agencies of the government and public utilities were responsible for the build-out - and continuing responsibilities for maintenance. Already used for many kinds of infrastructure, it would be a useful exercise to see how intersections might be improved by integrating new technology into both large and small intersections. Perhaps the	ODOT has closely coordinated the design of local connections to and from the Brent Spence Bridge corridor with local municipalities. Intersections and traffic control within the project limits will be designed and constructed in accordance with current design standards and processes. Modifications to local roadways and intersections outside of the project area are the responsibility of the City of Cincinnati.	Design Criteria (3.4)



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			often cluttered visual intersection space could benefit from a redesign of the infrastructure that often supports existing lights and signage (not to mention trees and utility poles). This might be accomplished by replacing the plethora of vertical poles supporting such items with a pair of non-corroding tapered parabolic aluminum pipes that each run from corner to corner and tie together above the center of the intersection supporting a small to medium sized platform. The area on top of the platform can support an array of photovoltaic panels to supply power to the platform and its related equipment - including a small landing and recharging area for municipal drones and any aerials that might be used to collect and repeat signals to assist in providing all members of the public with high speed communications access. The area below the platform could be used for sensors and signage that can be placed above ground level sight lines to improve driver visibility and awareness. Typically, permanent location signage can be given improved visibility by making it larger with an easier to read font and better contrast - and by insuring that the programs in self-driving vehicles can also read it. A further improvement would be that its GPS coordinates would be clearly visible both on top and under the platform. Both traffic and parking control signage might be moved to high visibility LED panels which would only display when in effect - and could be changed easily to reflect changing circumstances.		
		B-161-2	02/23/2024 - Parking restrictions for high traffic periods or other activities such as street sweeping might need the facility to set off car alarms for vehicles in affected locations to alert vehicle owners that a sign has come on and action is needed with respect to their now	In response to portions of the comment related to pedestrians and speed control measures, Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. In support of the KYTC <i>Complete Streets</i> ,	Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
			illegally parked vehicle - and perhaps an optional ability to send a text message to the owners phone. Both traffic control and security/safety street lights would be supported by the platform, as would security cameras that monitor traffic, including 'red light' fixed cameras which include LIDAR to detect speed and read license plate data, and microphones which can monitor decibel level (often an issue in residential areas and also associated with vehicle speed) while also acting as nodes in a ShotSpotter type network. The fixed cameras would also have the ability to note the status of traffic lights and signage so that drivers cited for violations cannot argue that the light or sign was not on when a still video grab was made (possibly as simple as a small fixed mirror). The sensor array under the platform could also have a tilt/pan/zoom high definition day/night camera with an auxiliary directional ('shotgun') microphone that could follow suspicious or illegal movement as defined by an AI application. This capability could give law enforcement an almost instant ability to be virtually on the scene of a 911 complaint while providing a 911 operator visual information to supplement voice communications in order to make better informed decisions - especially where public disturbance problems arise. Such a system would allow law enforcement to capture such instances as drive by and other shooting incidents especially in areas where the local witnesses are uncooperative, unobservant, and or intimidated and therefore do not provide information on the incident. Such a camera could also be used by many agencies to monitor municipal infrastructure for needed maintenance without having to send personnel out to the site to physically inspect the area. In addition to lights, signage, and	Roads, and Highways Policy, the ODOT Multimodal Design Guide, and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) Regional Complete Streets Policy, Refined Alternative I (Concept I-W) will promote safety for bicyclists and pedestrians. The frontage roads and ramp connections with local streets are being designed as lower-speed urban roadways, which will encourage drivers to decelerate to safe speeds prior to reaching bicycle and pedestrian crossings. Furthermore, the buffer distance between automobile traffic and sidewalks and shared-use paths will be increased, improving bicyclist and pedestrian safety and comfort. Finally, lighting will be installed in underpass areas to improve safety and security for pedestrians and bicyclists. The remaining portions of the comment were considered unclear, and no response, other than to document the comment as received, can be provided.	

ID	Name	No.	Comment	Response	Reference ¹
			cameras, the structure could also support large		
			convex mirrors designed to allow drivers to see		
			if there was approaching cross traffic - a cheap safety feature that does not need power. All of		
			these sensors would primarily surveil only		
			public areas so there would be little intrusion		
			into private areas - thus avoiding many		
			concerns about privacy issues. Needless to say		
			that these sensors would produce a vast		
			amount of normal and uninteresting video		
			which would typically be retained for only a		
			short period of time before being overwritten by		
			more recent material. The exception would be if		
			there is some kind of criminal activity noted		
			(excessive speed for example) or reported, at		
			which time the video sequence can be archived for later use in an investigation. Miscreants		
			fleeing the scene of some nefarious activity		
			could be easily tracked remotely with no need		
			for a high speed chase that might endanger the		
			community - and without the need to let them		
			get away either. Law enforcement could then		
			be vectored to an intercept where there are		
			minimal civilians who might be injured in a		
			confrontation. In addition to using cellular		
			towers to notify the public of emergency		
			conditions, a loudspeaker array could be added		
			under the platform to broadcast public safety announcements to affected populations for		
			various kinds of emergency situations. If street		
			racing is an issue, the sensors at intersections		
			can alert the authorities and document, in		
			detail, the illegal and unsafe activity that is		
			going on. When building out new infrastructure,		
			passive speed control measures can also be		
			considered - both speed bumps and less		
			obtrusive speed 'dips' which can also help with		
			drainage. Such platforms can easily extend the		
			range and time on station for police (and other)		
			first responder drones by giving them a local		



D	Name	No.	Comment	Response	Reference ¹
			place to land and recharge without having to		
			return to a central location until after		
			recharging*. With the increased use of delivery		
			drones, these UAVs would also have a place to make an emergency landing which would not		
			endanger the public. With sturdy poles		
			supporting high platforms, this infrastructure		
			could be easily leveraged by providing		
			overhead pedestrian walkways by adding		
			lightweight walkways at an appropriate height		
			accessed by spiral staircases. This could		
			improve safety, especially for children, by		
			separating people from street traffic.The		
			walkways could be kept lightweight and low		
			maintenance by using expanded aluminum		
			large hole mesh which would not collect dirt or water - also used on the stair treads. For those		
			not wanting to use the walkways, the traditional		
			crosswalks would still be available with ramps		
			for wheelchair and stroller access. Once such a		
			system is being planned, it is likely that other		
			uses could be considered - large photovoltaic		
			arrays might be considered to power municipal		
			facilities and possibly feed the local grid to help		
			with the current climate crisis. *It was recently		
			noted in the New York Times - "In large cities, a		
			small number of streets account for an outsize number of violent crimes. Those streets are		
			usually in segregated Black neighborhoods		
			that, because of structural racism, have		
			suffered from decades of disinvestment and		
			physical and economic decline Without		
			changing these physical spaces in which crime		
			occurs, violence-prevention efforts are		
			incomplete." — Eugenia C. South. Municipal		
			investment in the above intersection		
			infrastructure will put the eyes and ears of law		
			enforcement and other agencies into these		
			areas and make the communities safer - and this will also contribute to having cooperative		



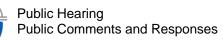
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			witnesses in the area as well as a quicker response time - possibly by using small inexpensive drones for tracking and documentation. With the cover provided by electronic monitoring, it is likely that human witnesses will be more likely to come forward as gangs of miscreants will not know where the information is coming from and therefore less likely to retaliate against witnesses. This can be especially true where (often stolen) vehicles are used in crime - especially 'drive by' gun violence where apprehension is often difficult due to lack of timely information. Feel free to share. Have a good day.		
B-162	Clements, Nichole		02/23/2024 - The Banklick Watershed Council is a local nonprofit that has been working to restore Banklick Creek and reduce pollution within the creek. The Banklick Watershed is just south of the Willow Run watershed along I- 75/71 in Northern Kentucky.	The commenter's support for the stormwater mitigation and enhancement measures incorporated into Refined Alternative I (Concept I-W) has been included in the project record.	Utilities (4.12.1)
			After reviewing the recently released environmental report, we would like to commend the Kentucky Transportation Cabinet on their commitment to separating the stormwater runoff out of the combined sewer system. This will be a huge benefit for reducing sewage overflows and flooding issues in the Willow Run Watershed.		
		B-162-2	02/23/2024 - Since the Banklick Watershed does not have combined sewers in this area, our stormwater concerns differ slightly from those in the Willow Run watershed. In the Banklick, we have separate storm sewer systems, which pipes stormwater runoff directly into the local creeks.	KYTC will coordinate with the Sanitation District No. 1 of Northern Kentucky (SD1) during detailed design on stormwater management and erosion control within the project limits that impact Moser's Branch Creek, a tributary to Banklick Creek.	Utilities (4.12.1)



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			 Over the past several years, we have witnessed a concerning increase in erosion, bank failures, landslides, and suspended solids within Banklick Creek. Studies have shown that excessive stormwater runoff and changes to the hydrology within the watershed is a major cause. This means that runoff from developed areas is a primary source of excess stormwater that is damaging our creek. The I-75/71 corridor crosses over a tributary to the Banklick called Moser's Branch Creek. Moser's Branch flows under the highway between the Kyles Lane and Dixie Highway exits. It flows through the Fort Wright Nature Preserve and Highland Cemetery Nature Trails. Moser's Branch then flows along Highland Pike (1072) down toward KY 17 where it combines with Horse Branch Creek and the mainstem of the Banklick. 		
			Moser's Branch is notorious for its previous landslides and overburdened hillsides. Historical slippage has caused destruction of the sewer line, sidewalks, parking area, and creek habitat.		
			We are concerned that the work being done for the Brent Spence bridge project will exacerbate our ongoing challenges in this area. The Banklick Watershed Council has invested millions of dollars in restoring the Banklick Watershed and without thoughtful consideration of how flows are released into the creeks, it could threaten our progress.		
			We are asking that the KYTC improve the existing and future stormwater management in this area to protect against further erosion, by designing to SD1's standards for stream channel protection. Typically, all this entails is adjusting the size of the stormwater outlets		



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			from detention areas to minimize erosive discharge into the Creek. This simple step would have a tremendous benefit for the downstream areas. We appreciate your consideration of our concerns and the minor design updates that could have a tremendous benefit to our stream restoration efforts.		
B-163	Tussey, Olivia	B-163-1	 02/24/2024 - I am a current final-semester graduate student at the University of Cincinnati getting my Masters in Community Planning. I am originally from Lexington and live in Northern Kentucky now. My more specific interest is in the intersection of sustainability and active transportation, and how an overhaul of the transportation system in the US (particularly in cities, where there is so much opportunity and excitement for transit but most authorities and governments are beholden to the interests of cars over people) would not only create more walkable and equitable communities, but would also have a positive environmental impact. As such, I am quite disappointed and alarmed by the Brent Spence expansion project, and wanted to share my thoughts as to why alternatives must be explored, if not for the sake of the community, then at least for the sake of avoiding the deep ironies and inconsistencies in pushing forward a project such as this. ODOT and KYTC should investigate congestion pricing in a no-build scenario in their consideration of alternatives to this project. While Kentucky state law prohibits the use of tolling to finance an expansion project of this type ("a development agreement or financial plan"), no regulation exists which 	Congestion pricing is a form of tolling. Previous tolling studies conducted by KYTC and ODOT indicate tolling the Brent Spence Bridge (BSB) Corridor would not meet the project purpose and need due to unmet travel demand. In addition, tolling would cause traffic diversion in local communities. The studies showed increased traffic primarily on the bridges crossing the Ohio River in the immediate vicinity of the cities of Covington, Cincinnati, and Newport with lower traffic diversion to I-275. During previous tolling studies for the BSB Corridor Project, local interests concentrated primarily in northern Kentucky expressed concern about the impacts of tolling and associated traffic diversion. In response to these concerns, the Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. Therefore, congestion pricing (which is a form of tolling) in a no-build scenario is not considered to be a reasonable alternative for the BSB Corridor Project, and the project does not include tolling. Previous study efforts related to tolling are posted on the "Documents" page of the project website under the years 2013, 2014, and 2015.	Funding (1.2.1)



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			would prohibit the use of tolling for congestion relief in a no-build scenario. Use of tolling as a financing mechanism was used in a similar project in Louisville, and the presence of tolling resulted in a significant decrease in traffic across a previously un-tolled river crossing. Evidence in the field of urban planning, including direct experience in the state of Kentucky, supports the use of congestion pricing or tolling as a "reasonable alternative" to highway widening for congestion relief, and no consideration of this alternative has been made in the development of the BSCP. The Federal Highway Administration Office of Operations promotes congestion pricing as a "way of harnessing the power of the market to reduce the waste associated with traffic congestion."		
		B-163-2	02/24/2024 - The parties involved have reduced the number of homes that will be demolished but in doing so they are subjecting the remaining residents to a lifetime of increased air pollution.	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	Air Quality (4.6)
				KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <u>Quantitative MSAT Analysis Report</u> (August 2023). The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in	



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				emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses	



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				such as schools, parks and recreation areas, and hospitals.	
		B-163-3	02/24/2024 - The freeway expansion project will further damage and harm the minority residents (primarily Black and Hispanic) who live in higher concentration in the immediate area of the project in both Cincinnati, Ohio and Covington and Park Hills, KY. It is ironic to me and many others that Cincinnati issued an apology to the West End for its history of destroying the community with the construction of the highways, at the same time that this project was being pushed through which will only cause further damage to the community. That sentiment now comes across as only surface-level and for appearances.	 An Environmental Justice Analysis Report (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on environmental justice populations: No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; No adverse indirect and cumulative effects; No disproportionately high and adverse relocation, noise, or temporary construction effects; and Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood. 	Environmental Justice (4.1.7)
		B-163-4	02/24/2024 - The Green House Gas emissions from construction must be considered, a massive amount during the years of construction, which will continue adding to the planet's heating every year for perhaps the next century, and undercounting of ongoing GHG emissions due to inadequate treatment of induced traffic.	The evaluation of greenhouse gases and climate change prepared for the supplemental Environmental Assessment (EA) followed the guidance issued by the Council on Environmental Quality using methodologies discussed and in consultation with the U.S. Environmental Protection Agency (USEPA). The analysis was conducted at a quantitatively high level using USEPA's MOtor Vehicle Emission Simulator (MOVES). MOVES is USEPA's official model for state implementation plans and transportation conformity analyses and is listed by the U.S. Department of Transportation as the most common approach for modeling greenhouse gas emissions for transportation projects.	Greenhouse Gases and Climate Chang (4.7) Construction Impacts (4.11)



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				KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted using travel demand models for the project's approved certified traffic.	
				Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				In addition, roadway construction can contribute to the total greenhouse gas footprint of on-road transportation, including emissions from extraction, transportation, and production of roadway construction materials, and emissions from fuel used onsite from construction equipment and vehicles. Construction emissions can also include greenhouse gas emissions from roadway resurfacing and reconstruction, routine maintenance, and traffic delay resulting from construction activity.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate	



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				temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
				Avoidance, minimization, and mitigation measures incorporated into the project's environmental commitments will help to address greenhouse gas emissions during construction. These measures include developing detailed traffic management, maintenance of traffic, and incident management plans to minimize traffic congestion; requiring ultra-low sulfur diesel fuel for all diesel-powered construction equipment; prohibiting the burning of any materials on the construction site; minimizing idling time for diesel-powered equipment to the greatest extent practicable; and using solar power for digital signs to the greatest extent possible.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
		B-163-5	02/24/2024 - It is very telling that the Environmental Impact Statement being used as a reference point for this project is over a decade old, and says that such a project would have no negative environmental or human impact when that is so clearly untrue. It is in	The supplemental EA has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental	Introduction (1.)



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			poor taste and practice to not have a newer statement created.	commitments (enhancements and mitigation), and additional National Environmental Policy Act reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W).	
		B-163-6	02/24/2024 - It is also so crucial to note that part of why the project was proposed in the first place was to handle projected increases in trucking transportation, but the projected increases in traffic volume that were used back then to justify the need for adding a new 10- lane bridge have not even occurred. More congestion can't be solved with the current plan, (as has been shown time and again in examples of widening projects around the country). This is especially true given the inherent nature of this corridor.	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT, KYTC, and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI). Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum (December 2023)</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors,	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
				including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods. Traffic projections prepared during the preparation of the 2012 EA estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	
		B-163-7	02/24/2024 - There's a fundamental flaw in the design of the region's traffic network: all the traffic is funneled into one major route. As the ODOT Brent Spence project manager acknowledged years ago, "We could continue to build lanes on 75, but they would fill because of the nature of the traffic network in the region." In other words, this region cannot build its way out of the traffic congestion issues without fundamental changes in the design of the overall network or by investing in other modes such as bus, light-rail, and better biking/walking infrastructure.	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, neither expanded transit routes nor passenger rail would meet the project purpose and need, and they are not considered to be reasonable alternatives for the BSB Corridor Project. The Initiative concluded that a highway improvement project was necessary to address capacity issues on I-75, including the BSB Corridor. While the original findings of the Initiative called for four lane continuity in each	Purpose and Need (2.) Travel Patterns and Access (4.1.4)



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				direction on I-75, traffic analyses completed as part of ODOT's Millcreek Expressway and Thru the Valley projects determined that five lanes were needed south of the I-74/I-75 interchange. This change was approved by OKI. The BSB Corridor Project addresses the highway component of the Initiative by improving interchanges and providing the number of lanes previously approved by OKI.	
				Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. The transit component included in the Initiative must be developed and championed regionally, and ODOT and KYTC are ready to support this when it is advanced at a regional level.	
				Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the communities surrounding the project area. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental EA. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	



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				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-163-8	 02/24/2024 - Overall, this project just seems like a prime example of the fact that transportation engineers have a very narrow view of the way that transportation actually impacts people, and that urban planners should more often be the people making these decisions. I am just 23 and I, along with most people in my generation, feel a deep, gutwrenching despair over the state of the world every single day. Knowing that this project was set forth by groups that simultaneously say that they are on a mission to reduce emissions is sickening to me, but unfortunately not at all surprising. It is proof to me that politics as they are today is so much about pleasing lobbies and keeping to the status quo, even when the status quo is not only harming people but also a proven ineffective way of handling things. This project is a step backward from everything that is known about climate and sustainability issues, the actual conditions of the region, the current data on trucking, and the interests of the people who live here as well as future generations around the world. I, along with so many millions of others in my generation, am desperately grasping for any opportunity at a world that isn't falling apart. It is so disheartening and disappointing to see a project like this be proposed by leaders who say that they care about issues of sustainability 	The supplemental EA has been prepared consistent with 23 CFR §§ 771.129 and 771.130. The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W).	Introduction (1.)



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			implore you with everything in me to consider them.		
			I truly hope my message to you doesn't fall on deaf ears. If it does, at least I tried.		
B-164	Anonymous	B-164-1	02/24/2024 - ODOT should investigate congestion pricing in a no-build scenario in their consideration of alternatives to this project. While Kentucky state law prohibits the use of tolling to finance an expansion project of this type ("a development agreement or financial plan"), no regulation exists which would prohibit the use of tolling for congestion relief in a no-build scenario. Use of tolling as a financing mechanism was used in a similar project in Louisville, and the presence of tolling resulted in a significant decrease in traffic across a previously un-tolled river crossing. Evidence in the field of urban planning, including direct experience in the state of Kentucky, supports the use of congestion pricing or tolling as a "reasonable alternative" to highway widening for congestion relief, and no consideration of this alternative has been made in the development of the BSCP. The Federal Highway Administration Office of Operations promotes congestion pricing as a "way of harnessing the power of the market to reduce the waste associated with traffic congestion."	Congestion pricing is a form of tolling. Previous tolling studies conducted by KYTC and ODOT indicate tolling the Brent Spence Bridge (BSB) Corridor would not meet the project purpose and need due to unmet travel demand. In addition, tolling would cause traffic diversion in local communities. The studies showed increased traffic primarily on the bridges crossing the Ohio River in the immediate vicinity of the cities of Covington, Cincinnati, and Newport with lower traffic diversion to I-275. During previous tolling studies for the BSB Corridor Project, local interests concentrated primarily in northern Kentucky expressed concern about the impacts of tolling and associated traffic diversion. In response to these concerns, the Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. Therefore, congestion pricing (which is a form of tolling) in a no-build scenario is not considered to be a reasonable alternative for the BSB Corridor Project, and the project does not include tolling. Previous study efforts related to tolling are posted on the "Documents" page of the project website under the years 2013, 2014, and 2015.	Funding (1.2.1)
		B-164-2	02/25/2024 - ODOT should consider any alternative that involves transit expansion, that would allow a smaller highway improvement/expansion project.	In 2004, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation</u> <u>Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not	Purpose and Need (2.)



ID	Name	No.	Comment	Response	Reference ¹
				address capacity issues on I-71/I-75. Therefore, expanded transit would not meet the project purpose and need and are not considered to be a reasonable alternative for the BSB Corridor Project.	
		B-164-3	02/25/2024 - With regard to the DOT claims of great need for greater truck traffic capacity, they rely on an outdated 2004 study/report. The actual traffic counts, indicate that traffic counts overall, have not been increasing as repeatedly projected by ODOT or KYTC.	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT, KYTC, and OKI. Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019.	Traffic (3.8)
				KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum (December 2023)</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making	
				from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u>	



ID	Name	No.	Comment	Response	Reference ¹
				<u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
				Traffic projections prepared during the preparation of the 2012 Environmental Assessment (EA) estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	
		B-164-4	02/25/2024 - ODOT should investigate, through formal technical feasibility studies, narrowing the right of way and reconnecting city streets to reduce impact of the interstate highway through the West End neighborhood. This would facilitate the long-term rehabilitation of this community and bring the project in alignment with stated USDOT objectives of reconnecting communities that have been adversely impacted by prior infrastructure projects.	Refined Alternative I (Concept I-W) requires one commercial relocation (a small printing shop) in the West End neighborhood. In addition, the footprint of Refined Alternative I (Concept I-W) has been reduced and requires only minor amounts of strip right-of-way in the West End neighborhood. Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements to provide additional community benefits, including reducing the project footprint,	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2) Travel Patterns and Access (4.1.4) Public Comments (5.1.1)



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				incorporating aesthetic treatments throughout the corridor; and providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods in Ohio.	
				Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
		B-164-5	02/25/2024 - More congestion can't be solved with the current plan. There's a fundamental flaw in the design of the region's traffic network: all the traffic is funneled into one major route. As the ODOT Brent Spence project manager acknowledged years ago, "We could continue to build lanes on 75, but they would fill because of the nature of the traffic network in the	The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, neither expanded transit routes nor passenger rail would meet the project purpose and need. and they are not considered to be reasonable alternatives for the BSB Corridor Project.	Purpose and Need (2.) Travel Patterns and Access (4.1.4)



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			region." In other words, this region cannot build its way out of the traffic congestion issues without fundamental changes in the design of the overall network or by investing in other modes such as bus, light-rail, and better biking/walking infrastructure.	The Initiative concluded that a highway improvement project was necessary to address capacity issues on I-75, including the BSB Corridor. While the original findings of the Initiative called for four lane continuity in each direction on I-75, traffic analyses completed as part of ODOT's Millcreek Expressway and Thru the Valley projects determined that five lanes were needed south of the I-74/I-75 interchange. This change was approved by OKI. The BSB Corridor Project addresses the highway component of the Initiative by improving interchanges and providing the number of lanes previously approved by OKI.	
				Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. The transit component included in the Initiative must be developed and championed regionally, and ODOT and KYTC are ready to support this when it is advanced at a regional level.	
				Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the communities surrounding the project area. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental EA. Refined Alternative I (Concept I-W) is compatible with local transit services,	



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				does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-164-6	02/25/2024 - ODOT reduced the number of homes that will be demolished but in doing so they are subjecting the remaining residents to a lifetime of increased air pollution.	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	Air Quality (4.6)
				KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <i>Quantitative MSAT Analysis Report (August 2023).</i> The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that	



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				modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-164-7	02/25/2024 - The freeway expansion project will further damage and harm the minority residents (primarily Black and Hispanic) who live in higher concentration in the immediate	An <u>Environmental Justice Analysis Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The analysis	Environmental Justice (4.1.7)



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			area of the project in both Cincinnati, Ohio and Covington and Park Hills, KY.	concluded that Refined Alternative I (Concept I-W) would result in the following effects on environmental justice populations:	
				 No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; 	
				- No adverse indirect and cumulative effects;	
				 No disproportionately high and adverse relocation, noise, or temporary construction effects; and 	
				- Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood.	
		B-164-8	02/25/2024 - ODOT needs to consider the Green House Gas emissions from construction, a massive amount during the years of construction, which will continue adding to the planet's heating every year for perhaps the next century, and undercounting of ongoing GHG emissions due to inadequate treatment of induced traffic.	The evaluation of greenhouse gases and climate change prepared for the supplemental EA followed the guidance issued by the Council on Environmental Quality using methodologies discussed and in consultation with the U.S. Environmental Protection Agency (USEPA). The analysis was conducted at a quantitatively high level using USEPA's MOtor Vehicle Emission Simulator (MOVES). MOVES is USEPA's official model for state implementation plans and transportation conformity analyses and is listed by the U.S. Department of Transportation as the most common approach for modeling greenhouse gas emissions for transportation projects.	Greenhouse Gases and Climate Change (4.7) Construction Impacts (4.11)
				KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted using travel demand models for the project's approved certified traffic.	



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				Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				In addition, roadway construction can contribute to the total greenhouse gas footprint of on-road transportation, including emissions from extraction, transportation, and production of roadway construction materials, and emissions from fuel used onsite from construction equipment and vehicles. Construction emissions can also include greenhouse gas emissions from roadway resurfacing and reconstruction, routine maintenance, and traffic delay resulting from construction activity.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses	



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				such as schools, parks and recreation areas, and hospitals.	
				Avoidance, minimization, and mitigation measures incorporated into the project's environmental commitments will help to address greenhouse gas emissions during construction. These measures include developing detailed traffic management, maintenance of traffic, and incident management plans to minimize traffic congestion; requiring ultra-low sulfur diesel fuel for all diesel-powered construction equipment; prohibiting the burning of any materials on the construction site; minimizing idling time for diesel-powered equipment to the greatest extent practicable; and using solar power for digital signs to the greatest extent possible.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
B-165	Patil, Arnand	B-165-1	02/26/2024 - I would really like to see the highway capped and have a local street network built on top of it.	ODOT and KYTC have considered options for capping I-75 in Ohio, which is documented in the <i>Public</i> <i>Involvement Summary</i> (January 2024). Once the interstate passes over the Ohio River, it cannot descend directly into downtown Cincinnati. South of 5 th Street, I-75 must stay elevated to cross active CSX rail lines between Pete Rose Way and 3 rd Street. In addition, any design requires accommodating a complicated system of mainline and ramp movements to provide local access and continuity along I-71, I-75, and US-50. Depressing the roadway to support a freeway cap while meeting these geometric constraints would require steep roadway grades that would not meet design standards. Such steep	Public Comment Outcomes (5.1.2)



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				grades would present traffic operational and safety concerns, particularly considering the high volumes of heavy truck traffic traveling through the corridor.	
				Between 5 th Street and Ezzard Charles Drive, including portions of the West End neighborhood, there are several areas where 1-75 is relatively level with the surrounding land uses. A freeway cap could be constructed either by leaving 1-75 at the current elevation or by lowering the interstate. If the existing 1-75 elevation is maintained, a freeway cap would need to be constructed 20 to 30 feet over the highway to provide adequate clearance for the freeway lanes. Given the proximity of Western Avenue and Winchell Avenue, the freeway cap would either need to extend over these roads, or Western and Winchell avenues would need to be raised up to be level with the top of the cap. Transitioning from the top of the highway cap back to the elevations of the surrounding land uses in a way that provides accessible and open connections east and west of 1-75 would substantially increase the project's footprint beyond what is considered reasonable and would impact low-income housing, schools, parks, historic structures, commercial and industrial businesses, and local streets. These impacts could be reduced through the extensive use of retaining walls along either 1-75 or Western and Winchell avenues. However, the retaining walls would render the cap inaccessible from surrounding land uses and would only serve to create an even greater barrier through downtown Cincinnati and the West End neighborhood. Building a freeway cap by lowering 1-75 would avoid the need for retaining walls; however, the interstate would need to be lowered by 20 to 30 feet, which would require prohibitively steep grades to meet the geometric constraints of the CSX rail lines. Furthermore, capping the highway would likely require the removal of 1-75 connections with 5 th Street, 6 th Street, 7 th Street, and 8 th Street and would not be able to accommodate US-50, which is an important regional connection.	



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				I-75 is elevated above the surrounding land uses in the portions of the West End neighborhood that are north of Ezzard Charles Drive. Capping the highway in this area would further exacerbate the concerns with geometric feasibility, impacts to surrounding land uses, and local accessibility discussed for portions of I-75 to the south.	
		B-165-2	02/26/2024 - Many years ago, I-75 decimated the West End, and to this day, the neighborhood has not recovered to the same vibrancy before the highway. This is the one chance we have to make a significant positive change for the West End neighborhood and the City as a whole. Our transportation networks don't have to come at a cost for the people in its immediate surroundings - it's possible that they can have a net positive effect overall. This type of project only happens once every 50 years, so if we don't do it correct this time, it's going to be a long time before we get another chance to do it right.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several enhancements to further benefit surrounding communities. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit on community cohesion in the West End neighborhood due to the incorporation of aesthetic enhancements, proposed noise barriers, and drainage improvements. Refined Alternative I (Concept I-W) will also build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	Purpose and Need (2.) Neighborhood and Community Cohesion (4.1.2) Cumulative Effects (4.10.2)
				Refined Alternative I (Concept I-W) was evaluated for cumulative effects specific to the West End neighborhood. Cincinnati's West End, now partitioned into the Queensgate and West End neighborhoods, is an area that was historically impacted by urban renewal plans that were common in the United States in the mid-twentieth century. Refined Alternative I (Concept I-W) requires one commercial relocation (a small printing shop) in the West End neighborhood. In addition, the footprint of Refined	



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				Alternative I (Concept I-W) has been reduced and requires only minor amounts of strip right-of-way in the West End neighborhood. Refined Alternative I (Concept I-W) will not add to or exacerbate any adverse effects in the West End community from prior actions or events. In recognition of the history of City-sponsored urban renewal and the original Mill Creek Expressway (I-75) construction and as an enhancement in the West End neighborhood, ODOT will work with the City of Cincinnati, which includes the West End Community Council, to develop content for an interpretive display describing the West End community in relation to historic City urban renewal and the Millcreek Expressway construction and to identify a location in proximity to the I-75 corridor to install the display.	
		B-165-3	02/26/2024 - Please cap the highway and built a local street network on top of it! The extra land would be absolutely monumental to Cincinnati and allow for major economic opportunity and City growth.	ODOT and KYTC have considered options for capping I-75 in Ohio, which is documented in the <u>Public</u> <u>Involvement Summary</u> . Freeway caps were not found to be feasible due to issues related to traffic operations, safety, geometric design, accommodating local connections, and impacts to surrounding land uses. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several refinements to provide additional developable land. Refined Alternative I (Concept I-W) reconfigures the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati. ODOT has also committed to building an additional 50 feet of green space on each side of the Ezzard Charles Drive bridge over I-75 that could support potential future civic space or retail development by the City of Cincinnati.	Purpose and Need (2.) Future Design Refinements (3.7) Public Comment Outcomes (5.1.2)
				side of the Ezzard Charles Drive bridge over I-75 that could support potential future civic space or retail	



ID	Name	No.	Comment	Response	Reference ¹
				Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
		B-165-4	02/26/2024 - The current changes to the interchange are fine, but there is still tons of room for improvement. I personally think that, in general, \$3.6B would be a lot more useful being put towards creating a transit network in the Greater Cincinnati area; it would allow for a ton of economic potential and movement of a lot more people than a highway ever could. Although this project is probably not going to be cancelled and money put elsewhere, I'd encourage the state and federal government to really think about where large infrastructure money and grants should be going. Having a rapid transit network would be a lot more impactful positively both economically and transportation-wise to the Greater Cincinnati area than an extra lane on a bridge.	In 2004, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <i>North South Transportation</i> <i>Initiative</i> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit routes would not meet the project purpose and need and are not considered to be a reasonable alternative for the BSB Corridor Project. Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington CBD neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared- use paths incorporated into Refined Alternative I	Purpose and Need (2.) Travel Patterns and Access (4.1.4)

ID	Name	No.	Comment	Response	Reference ¹
				(Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-165-5	02/26/2024 - More vehicle traffic being funneled through our City area, both on the highway and the surrounding street network, will negatively affect the health of everyone living in the City. There is clear evidence at this point in time that more vehicle traffic is correlated with negative outcomes in respiratory health, heart disease, stress, anxiety, mental health, and so much more. Knowing that these things are true, it's irresponsible for the state to continue building hostile infrastructure projects like highway expansions through urban areas, where there are tons of people breathing in more traffic- related pollutants than ever. And all for one extra lane of traffic, which can only realistically move around 1.5k more people per hour.	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone. KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <u>Quantitative MSAT Analysis Report</u> (August 2023). The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less	Air Quality (4.6)

ID	Name	No.	Comment	Response	Reference ¹
			Trains can do tenfold that and without drastically hurting the health of the communities living in its immediate surroundings.	when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and	



ID	Name	No.	Comment	Response	Reference ¹
				local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-165-6	02/26/2024 - I think there's definitely value in having a bridge that doesn't have 11 foot lanes and a lack of shoulders. I think there's good reason to expand the bridge to have proper lane widths and shoulders, but having a whole new twin bridge seems overkill overall, when modifying the current bridge would accomplish a similar goal and be a lot cheaper.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Refined Alternative I (Concept I-W) will rehabilitate and reconfigure the existing double-decker BSB to reduce the number of lanes on each deck from four to three and provide inside and outside shoulders. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum (December 2023)</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. OKI's regional travel demand model also includes projected population and employment growth. The <i>Interchange Modification Study Addendum</i> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips	Project Descriptions (1.1) Purpose and Need (2.) Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
				in the project area through the year 2049, with a few minor exceptions during peak travel periods.	
		B-165-7	02/26/2024 - Additionally, a photo-enforced 45 mph speed limit would essentially achieve the same safety benefits that adding shoulders and proper lane widths would.	The speed limits on I-71/I-75 and the collector-distributor roadways will be established in accordance with current laws and design standards and processes.	Design Criteria (3.4)
		B-165-8	02/26/2024 - Also, congestion pricing would also fix the rush hour traffic by diverting unnecessary traffic over to I-275 and encouraging people to adjust their travel hours, which would render most of the \$3.6B being spent on this project entirely unnecessary, so I feel like overall the entire project is somewhat of a waste of money, unless changes like capping the highway are being made.	Congestion pricing is a form of tolling. Previous tolling studies conducted by KYTC and ODOT indicate tolling the BSB Corridor would not meet the project purpose and need due to unmet travel demand. In addition, tolling would cause traffic diversion in local communities. The studies showed increased traffic primarily on the bridges crossing the Ohio River in the immediate vicinity of the cities of Covington, Cincinnati, and Newport with lower traffic diversion to I-275. During previous tolling studies for the BSB Corridor Project, local interests concentrated primarily in northern Kentucky expressed concern about the impacts of tolling and associated traffic diversion. In response to these concerns, the Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. Therefore, tolling the existing BSB is not considered to be a reasonable alternative for the BSB Corridor Project, and the project does not include tolling. Previous study efforts related to tolling are posted on the "Documents" page of the project website under the years 2013, 2014, and 2015.	Funding (1.2.1)
B-166	Yount, Jeff	B-166-1	02/26/2024 - I was wanting to know if there will be a need to hire bridge inspectors for this project and where to go to apply for such positions.	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for	Economy and Employment (4.1.6)



ID	Name	No.	Comment	Response	Reference ¹
				businesses and individuals who want to work on the project.	
				Construction inspection services for the Brent Spence Bridge Corridor Project have already been contracted out by ODOT and KYTC.	
B-167	Boeckman, Carl	B-167-1	 02/26/2024 - The time to build the bridge is now! I attended the meeting at Longworth Hall, in Cincinnati, on February 21, 2024. The meeting started at 5:30 p.m. and I was one of the first persons to sign in. I did not speak at the meeting. I had attended the previous meeting that was held. At the Covington, KY Radisson Hotel last year. I am very interested in transportation issues. I am a lifetime member of the National Motorists Association. I am not representing that organization today. I have presented expert testimony before the Ohio Legislature. I am convinced that the transportation cabinets have given considerable thought to the environmental plan may not be perfect or give the environmentalists everything that they have requested. It has been 20 years since this project was proposed. At some time, the project must proceed. I notice massive traffic congestion on the southbound lanes of I-71, in Ohio. This congestion starts at the bridge and extends back to Ezzard Charles Drive and beyond. There is congestion on the northbound lanes of I-75, in Kentucky, close to the bridge. Vehicles that are not moving create stagnate pollution. The new companion bridge would eliminate congestion. 	The commenter's support for the Brent Spence Bridge (BSB) Corridor Project has been included in the project record. Certified traffic projections for the BSB Corridor Project were prepared according to the most current state and federal requirements, guidelines, and practices. The certified traffic projections were utilized to prepare an <i>Interchange Modification Study Addendum (December 2023)</i> , which concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods.	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
		B-167-2	02/26/2024 - The bridge needs to remain toll free. Besides the fact that no one wants to pay a toll tolls will entice drivers to avoid the bridge and seek out another bridge. The other bridges will suffer wear and there will be traffic congestion (and pollution) when the drivers are searching for other bridges.	The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. The BSB Corridor Project does not include tolling.	Funding (1.2.1)
		B-167-3	02/26/2024 - I am disappointed that the size of the bridge has been reduced by 65 feet. Motorists deserve a safe bridge. Some years ago, A driver ran out of gas on the bridge. He was struck by another vehicle and ended up being knocked over the bridge. Several years ago, a truck fire caused the bridge to be closed for several days.	The selected alternative described in the 2012 Environmental Assessment and Finding of No Significant Impact provided a new companion bridge that accommodated traffic traveling in opposite directions on the lower deck and separated on the upper deck. This traffic configuration required a center median with associated shoulders and center bridge supports. Refined Alternative I (Concept I-W) reconfigures how traffic will travel across the Ohio River. Traffic will travel in only one direction on each deck of the new companion bridge, which eliminates the need for a center median and center bridge supports. These refinements allowed the width of the new companion bridge to be reduced from 172 feet to 107 feet, substantially reducing the project footprint and costs. The new companion bridge will be designed in accordance with current design standards and processes. Refined Alternative I (Concept I-W) will improve safety on the roadways in the project area by including measures to reduce congestion-related crashes. In addition, the collector-distributor roadway system will improve safety by separating through and local traffic and keeping them separate for longer distances, thus reducing weaving movements that increase the risk of crashes. The removal of left-hand exits and other design deficiencies such as substandard shoulders are also expected to improve safety and reduce crashes by further reducing weaving movements and by providing a larger buffer for vehicles. The Interchange Modification Study Addendum documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's Interactive Highway Safety Design Model.	Additional Refinements (3.3) Design Criteria (3.4) Traffic (3.8) Refined Alternative I (Concept I-W) and Purpose and Need (3.9)



ID	Name	No.	Comment	Response	Reference ¹
		B-167-4	02/26/2024 - One suggestion would be to lessen the congestion that will be inevitably occur over the scope of this massive construction project. Please keep the motoring public informed through the media and ARTIMIS signs. Our local media outlets are very receptive to press releases.	Refined Alternative I (Concept I-W) is expected to result in temporary impacts for all transportation modes due to increased traffic on local roads, access restrictions, and detours. Temporary construction impacts will be minimized and mitigated to the greatest extent practicable through the development of traffic management, maintenance of traffic, and incident management plans, which will include the use of ARTIMIS signs and other variable electronic message boards.	Construction Impacts (4.11)
				During construction, a project website will provide regular project updates regarding maintenance of traffic plans, current traffic patterns, upcoming changes, etc. Information about construction sequencing, project highlights, and construction schedules will also be shared with the public through social media, e-newsletters, local media, presentations to local groups, and virtual project updates.	
		B-167-5	02/26/2024 - I appreciate all of the work that the transportation cabinets have performed. Let's build an aesthetically pleasing bridge.	KYTC, ODOT, and the project Aesthetics Committee are coordinating the design of the new companion bridge to ensure that it is an iconic, aesthetically pleasing structure. Once the final bridge type is determined, the project Aesthetics Committee will be engaged to provide feedback on the aesthetic elements of the new companion bridge and the existing BSB.	Visual Resources (4.9)
B-168	Anderson, Scott	B-168-1	02/26/2024 - As I am currently writing my dissertation (and future book) on the Black Brigade of Cincinnati's service in the Siege of Cincinnati during the Civil War, I was particularly intrigued by a recent vote of the City of Fort Wright to propose naming the new bridge "The Black Brigade of Cincinnati Bridge" (resolution: https://www.fortwright.com/Portals/fortwright/Do cuments/Res%2001- 2024%20(2p).pdf?ver=2024-01-05-091938- 410). This naming proposal would recognize the enlistment of men whose very act of service	While the new companion bridge may be formally named, the process for naming the new bridge has not yet been established. KYTC and ODOT have established a Bi-State Management Team to focus on procurement, financing, and project communications, and the Bi-State Management Team will continue working together to deliver the Brent Spence Bridge Corridor Project.	Project History (1.2)



ID	Name	No.	Comment	Response	Reference ¹
	 was intimately tied into the act of crossing the river, serving as a historical nod to both the state of Ohio and the commonwealth of Kentucky. It also would, along with the monument in Smale Riverfront Park, stand as a way to honor the "first formal organization of African Americans actually employed for military purposes in the North during the Civil War." I was unable to find if the proposal had been successfully transmitted or if any names at all were currently being considered for the new span. Do you know whether "The Black Brigade of Cincinnati Bridge" is under consideration? Any assistance you can provide would be greatly appreciated. 		 river, serving as a historical nod to both the state of Ohio and the commonwealth of Kentucky. It also would, along with the monument in Smale Riverfront Park, stand as a way to honor the "first formal organization of African Americans actually employed for military purposes in the North during the Civil War." I was unable to find if the proposal had been successfully transmitted or if any names at all were currently being considered for the new span. Do you know whether "The Black Brigade of Cincinnati Bridge" is under consideration? Any assistance you can provide 		
B-169	Flynn, Liz	B-169-1	02/27/2024 - I reside on the east side of Cincinnati. While recognizing traffic demand exceeds current capacity through the corridor in question, I have serious concerns about the project as proposed. First, the environmental impact study is already outdated at 10+ years in age and will be even more irrelevant by the time this project is completed almost as many years in the future.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	Introduction (1.)
		B-169-2	02/27/2024 - Second, any assessment of similar projects I have seen has only concluded that adding multiple lanes of traffic is akin to a band aid that eventually falls off and in the not	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
			to distant future we will be contemplating yet another similar project.	certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-169-3	02/27/2024 - Air quality in the Ohio Valley will only worsen with the additional traffic, hitting the neighborhoods nearest the highway hardest, which are likely to be in the lower socio-economic category and also likely battling other health conditions but also affecting all of us breathing the air.	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	Environmental Justice (4.1.7) Socioeconomic Groups (4.1.8) Air Quality (4.6)
				KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT)	



ID	Name	No.	Comment	Response	Reference ¹
				compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <i>Quantitative MSAT Analysis Report</i> (August 2023). The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	

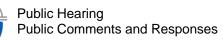


ID	Name	No.	Comment	Response	Reference ¹
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
				An <u>Environmental Justice Analysis Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The analysis concluded that Refined Alternative I (Concept I-W) will not have an adverse effect on air quality for environmental justice populations. A <u>Socioeconomic Technical Report</u> (January 2024) was also prepared to assess the effects of Refined Alternative I (Concept I-W) on older adults, individuals with limited English proficiency, adults with disabilities, and zero-car households. The analysis concluded that Refined Alternative I (Concept I-W) would have no effects on air quality for the socioeconomic populations and groups included in the analysis.	
		B-169-4	02/27/2024 - This approach is antiquated, backward thinking, lacking in creativity and inspiration, and does a disservice to our community. We should be looking for ways to building infrastructure to relieve local traffic via mass transit (light rail) and encouraging commuters to bike (e-bike incentives) that would benefit the health (physical and mental) of our residents and economies of both sides of	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit would not meet the project purpose and need and are not	Purpose and Need (2.) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
			the river by encouraging easier, safer and healthier transit.	considered to be a reasonable alternative for the BSB Corridor Project.	
				Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental EA. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
B-170	Holman, Victor	B-170-1	02/28/2024 - How do I Become A Construction Worker On The Brence Spence Bridge Corridor Project U.S.Navy Pershing Gulf Veteran Victor Holman [REDACTED] Industrial Millwrights Bull Rigger 15 Years plus.	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at	Economy and Employment (4.1.6)





ID	Name	No.	Comment	Response	Reference ¹
				https://walshkokosing.com/. The "Work With Us" page on the project website also contains links to resources for businesses and individuals who want to work on the project.	
B-171	Droganes, Sam	B-171-1	 02/29/2024 - I hope you will add my comments to the final NEPA decision. I recently received a card indicating I could email you so I am. I wish you would tell the decision makers to stop studying, overstudying, considering the impact on every bug that will be killed and every ounce of carbon that will hit the air and get the bridge built. I have watched this area for more than 40 years, be the best at studying bridges and worst at actually getting a bridge built. When I was in high school there was a federal grant to build three bridges across the Ohio, one in Maysville, one in Louisville and one in Covington. The only stipulation was that the bridge had to be built within 10 years or the money went away. What happened? Maysville started immediately, Louisville started a little later, but both cities got a new bridge basically paid for with federal funds. But Covington and Cincinnati squandered that money and opportunity, because in 10 years they could not agree on where to put a damn bridge. When the new or replacement for the Brent Spence first was seriously discussed it was less than a billion dollars. Now I understand it is beyond 3.5 billion. Meanwhile I read an article in The Economist about three years ago that Russia, a supposedly backward country, compared to our land of the free and home of the overregulated, the Russians built the longest bridge over water, at the time, in under four years and for about 1 billion USD. 	The commenter's support for the Brent Spence Bridge Corridor Project has been included in the project record.	N/A



ID	Name	No.	Comment	Response	Reference ¹
			How do these things make me feel as a former Northern Kentucky business owner, citizen, resident, Kentuckian and patriotic American? It makes me feel like the powers that be in this area are incompetent and too concerned with doing stupid things that cost money, rather than simply doing the work of getting the bridge built, which will benefit a giant swath of the community.		
			I could go on but I hope you get the point. Build the bridge and stop talking about it. I will say two good things about the current project. One it is good and the way it should be, that the tolling idea was tossed out. And secondly they did pick the best option, to upgrade the current Brent Spence for I-71 and build the new one, for I-75. Now if it just gets built! Frankly I will believe it when I see it. Thank you for considering these thoughts.		
B-172	Pierce, Steph	B-172-1	03/01/2024 - I was hoping to get in contact with the persons(s) in charge of hiring vendors for the marketing/video/social media/pre/post- construction video work. I have reached out several times to the following e-mail: WalshKokosingBrentSpence@walshgroup.com Is there another contact e-mail or phone number that I can use to reach out?	Businesses and individuals interested in working on the project may reach out directly to the design-build team using the following email address: <u>WalshKokosingBrent</u> <u>Spence@walshgroup.com</u> . You can also visit the Walsh Kokosing Design-Build Team website at <u>https://walshkokosing.com/</u> . The " <u>Work With Us</u> " page on the project website also contains links to resources for businesses and individuals who want to work on the project.	Economy and Employment (4.1.6)
				The project team followed up with the Walsh-Kokosing design-build team to make sure they had the commenter's information.	
B-173	Meyer, John W.	B-173-1	03/01/2024 - My wife and I live in a community called "The Views" in Covington ([REDACTED] Grays Peak) and we tried to sell our condo for the past 5 months without success. The feedback we are getting is that potential buyers	KYTC evaluated noise for Refined Alternative I (Concept I-W) in accordance with its <i>Noise Analysis and Abatement Policy</i> . As a result of those studies, KYTC is proposing seven noise barriers to mitigate noise impacts in Kentucky. In accordance with KYTC's noise policy,	Noise - Kentucky (4.8.1)



ID	Name	No.	Comment	Response	Reference ¹
		the combination of the current bridge and the companion bridge. I know some sound barriers are included in the project, but not all the way we		noise sensitive receptors within 500 feet of the project corridor were analyzed for noise impacts. The address provided by the commenter is approximately 3,000 feet west of I-71/I-75 and beyond the analysis area for the Brent Spence Bridge Corridor Project.	
B-174	Lentz, David	B-174-1	03/04/2024 - I am concerned and appalled that the Brent Spence replacement bridge will have not accommodation for rail transport. I am talking about passenger rail service not freight trains, which would be too heavy. Passenger rail trains are much lighter and can easily be built into the bridge structure. I am thinking about rail service out to the airport. This will be especially useful to people who have no car and the rest of us for that matter who would desire a fast convenient way to get to the airport. Please think of the future and provide a portion of the bridge dedicated to light rail service. It will save energy, reduce pollution and provide transportation to all Cincinnatians!	In 2004, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation</u> <u>Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and need and is not considered to be a reasonable alternative for the Brent Spence Bridge Corridor Project. The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	Purpose and Need (2.)
B-175	Anonymous	B-175-1	03/04/2024 - While the bridge is necessary, Cincinnati needs to reexamine its strategy. Instead of just increasing lanes, we should add dedicated public transportation lines as well as pedestrian and biking paths. This would lower	In 2004, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation</u> <u>Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative	Purpose and Need (2.) Travel Patterns and Access (4.1.4)

ID	Name	No.	Comment	Response	Reference ¹
			the environmental impact as well as lower the transportation impact on the bridge.	concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit would not meet the project purpose and need and are not considered to be a reasonable alternative for the Brent Spence Bridge (BSB) Corridor Project.	
				Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	



ID	Name	No.	Comment	Response	Reference ¹
B-176	Anonymous	B-176-1	03/04/2024 - My understanding is that there will be 16 lanes of traffic, but no other method of crossing the bridge. I think it would be fantastic to have the light rail system extended to go over the bridge. In addition, a way to bicycle or walk.	In 2004, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation</u> <u>Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and need and is not considered to be a reasonable alternative for the Brent Spence Bridge (BSB) Corridor Project.	Purpose and Need (2.) Future Design Refinements (3.7) Public Comment Outcomes (5.1.2)
				The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	
				Pedestrian and bicycle accommodations will not be permitted on the new companion bridge or the existing BSB because of the proximity of a reasonable crossing at the Clay Wade Bailey Bridge. Preliminary investigations indicate that adding bike lanes to the Clay Wade Bailey Bridge may be feasible. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. KYTC and ODOT have committed to evaluate reconfiguring the lanes on the Clay Wade Bailey Bridge to add bicycle lanes during the innovation process.	
		B-176-2	03/04/2024 - I am concerned about the toxic metals in the wastewater and would like to know how that will be mitigated. We have a	ODOT and KYTC are working to improve water quality through stormwater runoff management across all projects in their respective states. In northern Kentucky,	Utilities (4.12.1)



ID	Name	No.	Comment	Response	Reference ¹
			once in a lifetime opportunity to make this a bridge of the future: Clean, accessible, and safe.	transportation projects must address the quantity of stormwater runoff by separating interstate runoff from combined sewer systems. While only runoff from new impervious area is required to be separated, KYTC will separate all interstate runoff from the BSB corridor from the existing combined sewer system.	
				In the Cincinnati area, transportation projects must address both the quantity and quality of stormwater runoff, both by separating stormwater runoff from combined sewer systems and providing measures known as best management practices (BMPs) to reduce stormwater pollutants. The project will separate highway drainage from the existing combined sewer system in Ohio, and ODOT will partner with the Metropolitan Sewer District of Greater Cincinnati to build infrastructure to drain directly to Mill Creek and/or the Ohio River. To address water quality treatment requirements in Ohio, vegetated options for stormwater BMPs will be utilized to the maximum extent practicable. Given the dense urban land use in the project area, the majority of the stormwater BMP treatment requirements will be addressed via off-site mitigation. In late 2022, ODOT and Ohio Environmental Protection Agency began discussions regarding providing offsite mitigation at a 1.5:1 ratio in the I-74 median within the same watershed as Phases I and II of the BSB Corridor Project. The technical review of the offsite mitigation will be completed during detailed design, and ODOT will continue to coordinate with Ohio Environmental Protection Agency as each project phase progresses through detailed design.	
B-177	Baker, Aubrey	B-177-1	03/04/2024 - Trying to get information about my first cuz jumped off the Cincinnati bridge Saturday night around 10:00 pm trying to get some news about it. I live in Barbourville ky Thank you for your help.	The comment is not related to the Brent Spence Bridge Corridor Project, and no response, other than to document the comment as received, can be provided.	N/A



ID	Name	No.	Comment	Response	Reference ¹
B-178	Friedman, Jef	B-178-1	03/04/2024 - Can you please tell me when work is due to start on the Brent Spence bridge? Why is it taking so long? Thank you.	Construction on Phase III of the Brent Spence Bridge Corridor Project (Dixie Highway in Kentucky to Linn Street in Ohio) is expected to begin in 2025 and be substantially complete by 2030. Construction on Phase II (Linn Street to Findlay Street in Ohio) is expected to begin in 2026 with completion in 2031. Construction of Phase I (Findlay Street to Marshall Avenue in Ohio) is expected to begin in 2029 and be completed in 2032. The construction timeframes are typical for large, complex urban interstate widening projects and for the construction of a new double decker companion bridge spanning the Ohio River. The project schedule is determined by a number of factors, including the need to obtain environmental approval for the project, the time needed for detailed design, and the availability of funding.	Project Description (1.1)
B-179	Kugler, Kathy	B-179-1	03/05/2024 - I support making this bridge multimodal. No more 18 lanes.	The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. Pedestrian and bicycle accommodations will not be permitted on the new companion bridge or the existing Brent Spence Bridge (BSB) because of the proximity of a reasonable crossing at the Clay Wade Bailey Bridge. Preliminary investigations indicate that adding bike lanes to the Clay Wade Bailey Bridge may be feasible. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the designbuild team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. KYTC and ODOT have committed to evaluate reconfiguring the lanes on the Clay Wade Bailey Bridge to add bicycle lanes during the innovation process.	Purpose and Need (2.) Future Design Refinements (3.7) Traffic (3.8) Travel Patterns and Access (4.1.4) Public Comment Outcomes (5.1.2)



ID	Name	No.	Comment	Response	Reference ¹
				the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the Ohio- Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum (December 2023)</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <i>Interchange Modification Study Addendum</i> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-179-2	03/05/2024 - I support verification with science that this increase lanes will not increase water pollution, air pollution and climate no act worse poor neighborhoods in its patchy.	The final portions of this comment were considered unclear, and no response, other than to document the comment as received, can be provided. Responses to the remaining portions of the comment are provided below. The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed	Ecological Resources (4.2) Air Quality (4.6) Greenhouse Gases and Climate Change (4.7)



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				site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. These include updated ecological surveys, new and updated air quality studies, and new consideration of greenhouse gases and climate change.	Utilities (4.12.1)
				ODOT and KYTC are working to improve water quality through stormwater runoff management across all projects in their respective states. In northern Kentucky, transportation projects must address the quantity of stormwater runoff by separating interstate runoff from combined sewer systems. While only runoff from new impervious area is required to be separated, KYTC will separate all interstate runoff from the BSB corridor from the existing combined sewer system.	
				In the Cincinnati area, transportation projects must address both the quantity and quality of stormwater runoff, both by separating stormwater runoff from combined sewer systems and providing measures known as best management practices (BMPs) to reduce stormwater pollutants. The project will separate highway drainage from the existing combined sewer system in Ohio, and ODOT will partner with the Metropolitan Sewer District of Greater Cincinnati to build infrastructure to drain directly to Mill Creek and/or the Ohio River. To address water quality treatment requirements in Ohio, vegetated options for stormwater BMPs will be utilized to the maximum extent practicable. Given the dense urban land use in the project area, the majority of the stormwater BMP treatment requirements will be addressed via off-site	



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				mitigation. In late 2022, ODOT and Ohio Environmental Protection Agency began discussions regarding providing offsite mitigation at a 1.5:1 ratio in the I-74 median within the same watershed as Phases I and II of the BSB Corridor Project. The technical review of the offsite mitigation will be completed during detailed design, and ODOT will continue to coordinate with Ohio Environmental Protection Agency as each project phase progresses through detailed design.	
				Finally, KYTC and ODOT have incorporated environmental commitments into the project that require the resident engineer and contractor to develop BMPs prior to onsite activities to ensure continuous erosion control throughout the construction and post-construction period.	
				Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	
				KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a <u>Quantitative MSAT Analysis Report</u> (August 2023). The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario.	
				Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and	

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				Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	



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				KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic.	
				Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
		B-179-3	03/05/2024 - Bridge Forward plan gives us a better way.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. Features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network	Purpose and Need (2.) Alternatives (3.) Future Design Refinements (3.7) Public Comments (5.1.1)



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				of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <u>Public Involvement Summary</u> (January 2024). During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
		B-179-4	03/05/2024 - Just increasing lanes is wrong.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors.	Purpose and Need (2.)
		B-179-5	03/05/2024 - Light rail is not the same as heavy freight. Please make the bridge light rail right now .	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project.	Purpose and Need (2.)
				The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are	



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				ready to support this when it is advanced at a regional level.	
		B-179-6	03/05/2024 - By using less lane and connecting the lane not used we can reinvigorate those neighborhoods destroyed by the past build.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. All existing local street connections across I-71/I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits, such as reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; incorporating aesthetic treatments throughout the corridor, and providing new and improved pedestrian and bicycle infrastructure will improve access in and between the neighborhoods in the project area. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Travel Patterns and Access (4.1.4) Public Comments (5.1.1)



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				developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
		B-179-7	03/05/2024 - We have a chance and responsibility to those affected who use it least. Poor folks with no car are getting health impairments. Older drivers having all those merges will be more at risk to have accidents or will stop using the bridge. Please make this a bridge for a healthy future not just a quick and costly fix to the current problem.	 An Environmental Justice Analysis Report (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on environmental justice populations: No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; No adverse indirect and cumulative effects; No disproportionately high and adverse relocation, noise, or temporary construction effects; and Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood. A Socioeconomic Technical Report (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on older adults, individuals with limited English proficiency, adults with disabilities, and zero-car households. The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on these socioeconomic populations and groups: No impacts to community resources; pedestrian, bicycle, and transit access and mobility; safety; air quality; stormwater; and workforce development; No indirect impacts; 	Environmental Justice (4.1.7) Socioeconomic Groups (4.1.8) Traffic (3.8) Refined Alternative I (Concept I-W) and Purpose and Need (3.9)



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				- No substantial noise impacts;	
				 Minimal relocation and greenhouses gases and climate change impacts; 	
				 Minor vehicular access and mobility; visual setting; cumulative; and temporary construction impacts; and 	
				- Benefits due to mitigation and enhancements for parks and historic properties; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics and visual character; and direct and indirect workforce enhancements.	
				Refined Alternative I (Concept I-W) will improve safety on the roadways in the project area by including measures to reduce congestion-related crashes. In addition, the collector-distributor roadway system will improve safety by separating through and local traffic and keeping them separate for longer distances, thus reducing weaving movements that increase the risk of crashes. The removal of left-hand exits and other design deficiencies such as substandard shoulders are also expected to improve safety and reduce crashes by further reducing weaving movements and by providing a larger buffer for vehicles. The <u>Interchange Modification Study Addendum</u> documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's Interactive Highway Safety Design Model.	
B-180	Jahnke, Sherry	B-180-1	03/05/2024 - My husband and I have lived at [REDACTED] Rivard Drive in Fort Wright, KY for over 35 years. We lived through the nightmare of the changing of the cut of the hill- including the late night road work, noise, and the constant pounding of heavy machinery during the total revamping of the highway. That made the highway one lane closer to us, and destroyed our quiet park like setting. Then, years later we lived through the changing of the	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results in a <u>Traffic</u> <u>Noise Assessment: Brent Spence Bridge Corridor Project</u> <u>Kentucky Southern Section</u> (August 2023). As a result of that study, KYTC is proposing a noise barrier to reduce noise levels at the address provided by the commenter. The proposed noise barrier will be 20 feet in height and will help to provide some of the visual screening described by the commenter. During detailed design, and in accordance with the KYTC Noise Analysis and	Noise - Kentucky (4.8.1) Construction Impacts (4.11)



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			 interchanges in Northern KY. This added an access road, which put I-75 even closer to us. Now, the noise is impossible. A sound study was done years ago, and our house failed miserably-decibel levels were way above the norm. Now, finally we HAVE BEEN PROMISED A SOUND BARRIER! Unfortunately, it will be the last thing done during this project. If everyone is so concerned about the quality of life during this project, why can't something be done for the comfort and peace of the folks living through this? (for the third time) Can they possibly have the barrier installed earlier in the project? They will do the work at night to make it easier for commuters, but it is horrible for folks trying to sleep at nightbeeping, digging, scraping, plus the bright work lights are not good for sleep. A sound barrier earlier would make this project a little more bearable. Also, we are concerned with the type of sound barrier we receive. We would like it as thick and tall as we can get. The reason for a tall barrier is due to the constant flashing of lights we have dealt with for years. We have businesses and highway lights across I-75 from us, and every time a northbound truck passes our home, the lights are blocked-for a few seconds-then they return. Our bedroom is like sleeping with a strobe light-we have room darkening blinds and curtains, but the flashing is still very noticeable, especially while the screening trees are baresuch as now. So, if we received a taller wall, maybe it would block more of the light. (and of course, whatever material is the best for sound blocking would be wonderful) We haven't been able to hold a normal conversation on our deck for years-it usually turns into a scream fest! 	Abatement Policy, a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise barriers (benefitted receptors) at each location where they are proposed in Kentucky. Noise sensitive receptors will also be subjected to short- term, temporary noise impacts associated with the construction phase of Refined Alternative I (Concept I-W). Construction noise will generate temporary noise impacts on adjacent and nearby properties, particularly those in residential land use. Depending on project circumstances, options are available to minimize temporary noise impacts. In addition, consideration of construction noise minimization and mitigation (as necessary) is required pursuant to Title 23 of the Code of Federal Regulations (CFR) section 772.19. During design development, in addition to evaluating parameters such as cost, schedule, access, traffic impacts, safety, risk, etc., the project team has committed to considering construction noise abatement in areas where noise sensitive receptors are present. This includes evaluating the possibility of building noise barriers earlier in the construction process. Other examples of design decisions that could address construction noise impacts include foundation type selection, installation methodology, storage and staging areas, phasing of work, maintenance of traffic, and incentives. During construction, the project team has committed to incorporating proactive and reactive measures to address construction noise. This will be accomplished through equipment selection and maintenance, potential screening/shielding/barriers, scheduling of work, education of staff, and the development and implementation of the project's communication plan.	



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			Thank you for your time. If we sound grumpy, I guess we are. We love our 95 year old home. But, we have been dealing with I-75 for too many years. We know the construction will be horrible, but we know it is needed. A sound barrier before all the massive construction would make our lives better. Either way, we will be VERY glad to have the sound/light barrier-if we live long enough to see it!		
B-181	Wendel, Richard	B-181-1	03/06/2024 - Please see attached letter from the Columbia Tusculum Community Council supporting the Bridge Forward plan for the Brent Spence Corridor.	The comment references and includes a copy of a Columbia Tusculum Community Council letter dated February 19, 2024 that was directed to the Cincinnati City Council indicating support for concepts developed by Bridge Forward. Therefore, no response, other than to document the attachment as received, is provided.	Public Hearing (5.5)
				KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including those provided by the City of Cincinnati and Bridge Forward, prior to FHWA making a final decision on the supplemental Environmental Assessment. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	
B-182	Cohn, Carol	B-182-1	03/06/2024 - Increase from 8 to 16 lanes will only increase the volume of traffic and congestion on the bridge.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange</i> <i>Modification Study Addendum (December 2023)</i> , and the	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
				methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-182-2	03/06/2024 - Please consider a light rail system.	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project. The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit	Purpose and Need (2.)



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				component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	
		B-182-3	03/06/2024 - Low income and minority neighborhoods would be negatively impacted by the project as they already are impacted by sewer runoff.	An <u>Environmental Justice Analysis Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on environmental justice populations:	Environmental Justice (4.1.7)
				 No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; 	
				- No adverse indirect and cumulative effects;	
				 No disproportionately high and adverse relocation, noise, or temporary construction effects; and 	
				- Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood.	
		B-182-4	03/06/2024 - Increase in traffic volume would increase air pollution and consequently increase the level of asthma which is already high in at-risk neighborhoods.	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	Air Quality (4.6)
				KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios and documented the results in a	



ID	Name	No.	Comment	Response	Reference ¹
				Quantitative MSAT Analysis Report (August 2023). The emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no- build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no- build scenarios is not considered to be significant, and Refined Alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased	



ID	Name	No.	Comment	Response	Reference ¹
				emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-182-5	03/06/2024 - 90 acres of forest would be destroyed having a negative impact on fauna and flora in the area.	Refined Alternative I (Concept I-W) will disturb or remove 90 acres of forested habitat. The definition for forested habitat includes a wide range of trees and shrubs, some as small as 3-inches in diameter, and it also includes dead trees that are still standing. A large portion of the forested habitat impacted by Refined Alternative I (Concept I-W) is located within the existing right-of-way, is near to the existing interstate, and is near or within highly developed urban areas.	Terrestrial Habitat (4.2.3)
				The removal of up to 90 acres of forested habitat will result in the loss of potential foraging or maternity areas for the Indiana bat, the northern long-eared bat, and the tricolored bat. The removal of up to 4.38 acres of riparian habitat will result in the loss of potential foraging areas for the gray bat. Measures incorporated into the project to minimize and mitigate impacts to threatened or endangered bat species will also minimize and mitigate impacts to terrestrial habitat. These include minimizing tree removal and mitigating habitat loss in Kentucky through a contribution to the Imperiled Bat Conservation Fund. The Imperiled Bat Conservation Fund will offset project-related impacts to terrestrial habitats by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts.	



ID	Name	No.	Comment	Response	Reference ¹
B-183	Steigerwald, Tim	B-183-1	 03/06/2024 - We have been monitoring the great work on the Brent Spence bridge and I-75 corridor improvements. It sounds like you are making great progress. Last week our team studied the details around our corporate office (we are at [REDACTED] Court St.), and our building fronts the right-ofway on the 9th St. ramp to I-75 north along Winchell Ave. We noticed sound barriers that appear to cover a good part of our building along that right-of-way. We would like to understand more about the proposed design at this location. Can you let Brian and me know who we could meet with to understand the design intent, and share our comments? 	ODOT evaluated noise for Refined Alternative I (Concept I-W) and documented the results in a <u>Noise</u> <u>Analysis Report</u> (October 2023). The study found five noise barriers to be feasible and reasonable per ODOT's <u>Analysis and Abatement of Highway Traffic Noise Policy</u> <u>Statement</u> (ODOT noise policy), and ODOT is proposing noise barriers to mitigate noise impacts east of I-75 in the West End neighborhood. A short portion of the southernmost proposed noise barrier extends along the frontage of the property referenced by the commenter. In accordance with the ODOT <u>Analysis and Abatement of Highway Traffic Noise Policy Statement</u> , ODOT will conduct noise abatement public involvement with property owners and tenants who would benefit from proposed noise barriers in Ohio during the detailed design phases of the project. Inquiries about the project design can be directed to ODOT Brent Spence Bridge Corridor Project Manager: <u>Tom.Arnold@dot.ohio.gov</u> .	Noise - Ohio (4.8.2)
B-184	Weidl, Gerhard (Garry)	B-184-1	 03/06/2024 - Stacee, nice to speak with you about the BSBC noise barriers. He's the email I submitted to the Covington Commissions on that subject and a potential pocket park. A). BSBC - Noise Barrier Gap I attended both Public Hearings for the BSBC & was shocked to learn that there is a huge open gap, between Watkins & Hinde Sts, in the planned western most noise barrier wall that will run along the Bullock/12th St. I-75 South entrance ramp on the right hand side just before Hinde St, along southeastern Lewisburg. *(See: Figure 8: Refined Alternative I (Concept I-W) - Sheet 4 of 8) This gap is at the bottom of a rising, megaphone shaped valley up the hills and then 	KYTC evaluated noise for Refined Alternative I (Concept I-W) and documented the results for the portions of the corridor that include Watkins Street and Hinde Street in a <u>Traffic Noise Impact Analysis: Brent</u> <u>Spence Bridge Corridor Project Kentucky – Northern</u> <u>Section (August 2023)</u> and a <u>Noise Analysis Technical</u> <u>Memorandum Kentucky – Northern Section</u> (November 2022). As a result of those studies, KYTC is proposing a noise barrier on the west side of I-71/I-75 from West 3 rd Street to south of Hermes Avenue, which includes the area referenced by the commenter. The noise barrier in this area consists of several stand-alone noise walls. The proposed noise walls are located immediately adjacent to I-71/I-75 in the vicinity of Watkins Street and at the top of the slope west of the interstate in the vicinity of Hermes Avenue. The placement of the stand-alone noise walls was determined based on a barrier analysis and was determined to provide the greatest noise reduction in this	Noise - Kentucky (4.8.1)

BRENT SPENCE

ID	Name	No.	Comment	Response	Reference ¹
			 bounded by Hermes Ave (on the West), Watkins St (on the North) & Hinde St (what's left of it on the South) which severely amplifies the traffic noise to those 27 back yards, porches & homes as well as those up to Pike St and beyond to the West. I know this, since I have lived at 1240 Hermes Ave since before I- 75was built. This noise has been a problem since I-75 went in 65 yrs age & has increased as the highway has further encroached on this valley & Lewisburg. Unfortunately also, several years ago a new owner, Gabe Holdings LLC, purchased the 3/4 acre property at 617 Hinde St and suddenly clear cut the entire mature Forest constituting much of the hillside & bottomland of this valley without any permission, allowing the trees to just rot on the ground with only a small fine if any, I believe. This of course has only resulted in increased highway noise along with aesthetic loss & desolation you can still see, even from the Bullock I-75 South entrance ramp. It's about time action is being taken to deal with the noise barriers & I believe it's essential there be a "gap free" solid barrier whether earthen, transparent , solid wall or any combination thereof to help minimize this problem. Planners point out there is a second noise wall east of the Bullock entrance ramp as well, but I believe it alone Is inadequate by itself, since it ends so close to the huge open gap, the noise also coming from the northbound traffic, those trucks heavily accelerating to get up the hill & from noise in the cut in the hill in general, which may all reflect off the walls as planned & migrate to this planned huge open gap & up the valley as it currently does & has for 60+ yrs…helping to destroy a neighborhood all along. 	noise sensitive area. The proposed noise barrier was found to be feasible and reasonable when situated in the existing topography. During detailed design, and in accordance with the KYTC <i>Noise Analysis and Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from noise and noise/visual screening barriers (benefitted receptors) at each location where they are proposed in Kentucky. KYTC will further evaluate the space between the stand alone noise walls in the area referenced by the commenter during detailed design and the noise public involvement process. Comments regarding tree removal by private landowners are unrelated to the Brent Spence Bridge Corridor Project; therefore, no response, other than to document the comment as received, can be provided.	



ID	Name	No.	Comment	Response	Reference ¹
			Please help by supporting the need for a continuous gap free wall with the KYTC. I've also made this request in writing in the comments drop boxes at the public meetings as well. Ideally, I believe the western most noise barrier should be continuous from Bullock & 12 th Sts to the cut in the hill.		
			PS: * To Find Fig.84/8: 1) go to - "public input.com/BSBC" 2) - Documents: Supplemental Environmental Assessment - Part 1.pdf. 3) TABLE OF CONTENTS 4) LIST OF FIGURES 5) Figure 1: BSB Corridor Project Overview 6). Scroll to: - Figure 8: Refined Alternative I (Concept I-W) - Sheet 4 of 8.		
		B-184-2	03/06/2024 - B). POCKET PARK Proposal - please consider the valley area discussed above, bounded by Hermes Ave (on west), Watkins & Hinde Sts (on north & south) & affected by the BSBC project, as an area for either a reforested park area with a hiking trail, picnicking, playground, soccer/ball field, etcplease consider:	Refined Alternative I (Concept I-W) will not impact the area referenced in the comment. The comment was directed to the City of Covington, which is responsible for developing and maintaining public parks in the Lewisburg area. Therefore, no response, other than to document the comment as received, can be provided.	N/A
			- there are 3 or 4 property owners that might possibly be persuaded to sell/donate a significant portion of their property; if 4 agreed @ 1 acre available) - composed of hillsides & bottomland) most of which was taken care of & mowed before & after I-75 went through - but eventually as I75 noise continued to increasedthe result became trees, bushes, etc3 owner @ 0.9 acre , 1 @ 0.6 acre (617 Hinde St), 3 at 607,609 & 615 Watkins St @ 0.35 acre .		
			- perhaps Covington could leverage funding, soil, etc, et althat might be needed to build out a potential pocket park in Lewisburg to help		



ID	Name	No.	Comment	Response	Reference ¹
			replace the 0.6 acre loss at Goeble & mitigate the impact on Lewisburg residents & children over the decades & going forward.		
			 Lewisburg & other neighborhoods on west side had ball fields: 3 at Goeble; 1 at Covington Park (with stands & roofing @ 9th & Bullock?); 1 at Watkins & Bullock; 1 at Goldenrod (Bullock below cut in the hill) now have none! BSBC - Goeble Park looses 0.6 acres; Lewisburg Pocket Park - @ 0.4-1.0 acre potential? Valley bounded by Hermes Ave , Watkins & Hinde Sts. For potential pocket park. Existing Right Of Ways ROW - apparent for an Alley from Hinde St - south to north to 627 & 629 Watkins St ; Roadway(?) - Hinde St - (east end turns & runs from south to north to 611,613 & 615 Watkins St.). 		
B-185	Anonymous	B-185-1	03/06/2024 - Dear ODOT, I am writing to request that you produce an environmental impact statement for the Brent Spence Project.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act (NEPA) reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	Introduction (1.)
				The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined	



ID	Name	No.	Comment	Response	Reference ¹
				Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	
		B-185-2	03/06/2024 - As a 22-year-old Cincinnati resident who has been paying taxes for the past 4 years, I deserve to have my voice heard.	KYTC, ODOT, and FHWA will consider all comments received during the public comment period prior to FHWA making a final decision on the supplemental EA. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	Public Hearing (5.5)
		B-185-3	03/06/2024 - I did not even know that this project was going on until my professor at the University of Cincinnati brought this up in class. I am disappointed by this epistemic injustice. This information has been gatekept from young people which doesn't seem fair as we will have to deal with this bridge for the rest of our lives and our generation cares about this planet.	KYTC and ODOT have conducted extensive public involvement during the development of the Brent Spence Bridge (BSB) Corridor Project, as documented in the <u>Public Involvement Summary</u> (January 2024). Efforts have included: updating the project website; establishing social media accounts; distributing e-newsletters; conducting 12 small-scale and 4 broad-scale targeted environmental justice/neighborhood outreach meetings; and holding 2 open-house style project update meetings.	Public Involvement and Agency Coordination (5.)
				Members of the public were also provided the opportunity to review the supplemental EA, attend in-person and virtual public hearings, and provide comments to KYTC and ODOT during the 30-day public availability period. To make sure that all populations were aware of these opportunities, postcards advertising the availability of the supplemental EA and the public hearings were delivered to nearly 50,000 mailboxes in the greater Cincinnati/Northern Kentucky area.	



ID	Name	No.	Comment	Response	Reference ¹
				KYTC and ODOT have evaluated and responded to all comments received during the project's development. The design of Refined Alternative I (Concept I-W) has been refined in several locations in direct response to public comments.	
				Public involvement will continue to occur during the design and construction of the project. Furthermore, KYTC and ODOT will continue coordinating with the Project Advisory Committee and local agencies and stakeholders, who will continue to act as liaisons to the communities immediately affected by the project.	
		B-185-4	03/06/2024 - This decision will tear neighborhoods apart. Are we going to repeat the historic harms of the past?	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several enhancements further benefit surrounding communities. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	Neighborhood and Community Cohesion (4.1.2) Cumulative Effects (4.10.2)
				Refined Alternative I (Concept I-W) results in a minor contribution to cumulative business displacements; stormwater runoff; and loss of parkland, wetlands, streams, and threatened and endangered species habitat. Based on the evaluation of direct impacts contained in the supplemental EA, Refined Alternative I (Concept I-W) will improve community cohesion, improve traffic flow and safety for all modes of travel, provide additional economic opportunities, improve air quality, abate noise, improve aesthetics, and reduce flooding and storm sewer overflows, which will offset negative cumulative effects resulting from Refined Alternative I (Concept I-W). Therefore, when considered with other past, present, and reasonably foreseeable projects, Refined Alternative I	



ID	Name	No.	Comment	Response	Reference ¹
				(Concept I-W) is expected to result in a minor contribution to cumulative impacts.	
		B-185-5	03/06/2024 - Flowers are blooming in Antarctica, the ocean is the hottest it's ever been, and flowers started blooming in February. We don't have the time to wait, we don't have the time to be complicit, we want an inhabitable Earth in the next 30 years.	The intent of the comment as it pertains to the BSB Corridor Project was considered unclear, and no response, other than to document the comment as received, can be provided.	N/A
B-186	Anonymous	B-186-1	03/06/2024 - We should be considering the environmental impact on all residents.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. The supplemental EA evaluates the project's potential direct, indirect, and cumulative effects on all residents within the project area, including, but not limited to, minorities, low-income individuals, older adults, individuals with limited English proficiency, zero-car households, adults with disabilities, and children.	Introduction (1.)
		B-186-2	03/06/2024 - Increasing the amount of vehicles will only increase exhaust and noise pollution. There should be no semi engine braking aloud. Sound barriers are essential.	Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for	Air Quality (4.6) Noise (4.8)



ID	Name	No.	Comment	Response	Reference ¹
				PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	
				KYTC and ODOT also conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. The results are documented in a <i>Quantitative MSAT Analysis Report</i> (<i>August 2023</i>), which concluded that emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no-build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build scenario. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no-build scenarios is not considered to be significant, and Refined alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios using MOVES and travel demand models for the project's approved certified traffic. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050	



ID	Name	No.	Comment	Response	Reference ¹
				build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
				KYTC and ODOT evaluated noise for Refined Alternative I (Concept I-W) in accordance with their respective state noise policies. As a result of those studies, KYTC is proposing seven noise barriers to mitigate noise impacts in Kentucky, and ODOT is proposing five noise barriers to mitigate noise impacts in Ohio. Recognizing from neighborhood outreach efforts that traffic noise is a primary concern of area residents, KYTC conducted technical studies to evaluate additional noise/visual screening barriers where noise impacts were predicted but noise barriers were not warranted. Based on the technical feasibility and public comments received during outreach activities, KYTC is proposing two additional noise/visual screening barriers in Kentucky.	



ID	Name	No.	Comment	Response	Reference ¹
				In accordance with the KYTC <i>Noise Analysis and</i> <i>Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from proposed noise barriers and noise/visual screening barriers during the detailed design phase of the Brent Spence Bridge (BSB) Corridor Project. In accordance with the ODOT <i>Analysis and Abatement of</i> <i>Highway Traffic Noise Policy Statement</i> , ODOT will conduct noise abatement public involvement with property owners and tenants who would benefit from proposed noise barriers in Ohio during the detailed design phases of the project.	
				Construction noise is expected to generate temporary noise impacts on adjacent and nearby properties, particularly those in residential land use. During construction, the project team has committed to incorporating proactive and reactive measures to address construction noise. This will be accomplished through equipment selection and maintenance, potential screening/shielding/barriers, scheduling of work, education of staff, and the development and implementation of the project's communication plan.	
				KYTC has reviewed the legalities associated with the competing perspectives of safety and noise for engine compression brakes, or "jake brakes." This review revealed that "jake brakes" are authorized to be on vehicles as long as the braking system complies with both state and federal laws pertaining to noise standards. It has been determined that KYTC does not have the legal authority to restrict the use of "jake brakes" as a safety device on commercial vehicles. Likewise, according to an opinion issued by the Ohio Office of the Attorney General, local regulations restricting the use of engine brakes to control noise for motor carriers engaged in interstate commerce "may be inconsistent with federal law, and thus preempted and unenforceable." For this reason, ODOT will not install NO ENGINE BRAKE signs on the mainline and ramps of interstate routes.	



ID	Name	No.	Comment	Response	Reference ¹
		B-186-3	03/06/2024 - Prioritize river cities and their ease of travel. Many of us live and work in a small radius but still need transportation to get around.	It is unclear how this comment pertains to the BSB Corridor Project; therefore, no response, other than to document the comment as received, can be provided.	N/A
		B-186-4	03/06/2024 - Be considerate when building, be fast, and make it a beautiful bridge, we can do better than the brent spence.	During construction, the area surrounding the I-71/I-75 corridor will be temporarily impacted by increased traffic on local roads, reduced access, and detours due to construction activities. These impacts are anticipated to some extent for all modes of transportation, including vehicular, pedestrian, bicycle, and transit. Refined Alternative I (Concept I-W) is expected to result in temporary impacts for all transportation modes due to increased traffic on local roads, access restrictions, and detours. It is also expected to result in temporary utility impacts, air quality effects, noise increases, and erosion and sediment increases. Temporary economic and employment benefits are expected due to construction job creation and increased sale of construction-related supplies and services. Temporary construction impacts will be minimized and mitigated to the greatest extent practicable through the development of traffic management, maintenance of traffic, and incident management plans; coordination with local cities, transit agencies, and the regional incident management task force; notifications/outreach to public and trucking companies; and implementation of a dust control plan, measures to monitor and protect air quality, manage construction noise, and best management practices for erosion and sediment control. During construction, a project website will provide regular project updates regarding maintenance of traffic plans, current traffic patterns, upcoming changes, etc. Information about construction sequencing, project highlights, and construction schedules will also be shared with the public through social media, e-newsletters, local media, presentations to local groups, and virtual project updates.	Visual Resources (4.9) Construction Impacts (4.11)



ID	Name	No.	Comment	Response	Reference ¹
				KYTC, ODOT, and the project Aesthetics Committee are coordinating the design of the new companion bridge to ensure that it is an iconic, aesthetically pleasing structure. Once the final bridge type is determined, the project Aesthetics Committee will be engaged to provide feedback on the aesthetic elements of the new companion bridge and the existing BSB.	
		B-186-5	03/06/2024 - Also require the railroad to fix up and paint their bridge along with the elevated connectors in the city.	The maintenance and repair of bridges carrying railroads within the project limits is the responsibility of the railroad owners. Therefore, the BSB Corridor Project does not include painting or repair of any railroad bridges. Paint conditions of bridges that are maintained by KYTC or ODOT will be improved as part of the project.	Railroads (4.12.2)
		B-186-6	03/06/2024 - Also, it would be beneficial to covington, and cincinnati to have exit that quickly access gas stations/conveneince store and easily get back on the road. This may help gain some type of revenue from the increased vehicle traffic, more sales taxes collected = more services provided for thay city's residents.	Refined Alternative I (Concept I-W) will add a collector- distributor roadway system to connect interstate traffic to and from the local street network. Vehicles will exit from the interstate to the collector-distributor roadway system to access commercial establishments on local streets and will reenter the interstate via the collector-distributor roadway system.	Economy and Employment (4.1.6) Construction Impacts (4.11)
				Refined Alternative I (Concept I-W) is expected to result in net economic and employment benefits due to minimal effects on revenues from property taxes or property owner income from rental properties; no expected impacts on property values or the attractiveness of rental properties; net benefits to workforce development and employment; and improved infrastructure to support national freight movement. The construction of Refined Alternative I (Concept I-W) is expected to result in temporary increases in employment due to construction job creation. Temporary economic benefits are also anticipated due to increased sale of construction supplies, materials, equipment, and fuel from local and regional sources and increased revenue for businesses providing services to construction crews.	



ID	Name	No.	Comment	Response	Reference ¹
B-187	Keck, Yana	B-187-1	03/07/2024 – Just curious as to why there will be so many lanes? Are they really needed?	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8)
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Project population and employment growth are also incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods.	
		B-187-2	03/07/2024 - Will there be separate bus and/or truck lanes (for safety)?	Refined Alternative I (Concept I-W) does not include dedicated lanes for buses. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide	Traffic (3.8) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
				Refined Alternative I (Concept I-W) also does not include dedicated lanes for trucks. The <u>Interchange Modification</u> <u>Study Addendum</u> documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's Interactive Highway Safety Design Model, which considers roadway speeds and the number of trucks traveling on the interstate system. The safety analysis concluded that Refined Alternative I (Concept I-W) will reduce crashes on the existing BSB, the I-71/I-75 mainline in Kentucky, the I-75 mainline in Ohio, and locations of notable changes incorporated into Refined Alternative I (Concept I-W).	
B-188	Lurk, Dylan	B-188-1	03/08/2024 - I am writing to express my disapproval of the draft SEA for the Brent Spence Bridge Corridor Project. I do not feel this project adequately abates the impacts to the local communities that host this project.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act (NEPA) reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of	Introduction (1.) Social and Economic Resources (4.1) Environmental Commitments (Section 6. and ES-Table II)



ID	Name	No.	Comment	Response	Reference ¹
				refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	
				The supplemental EA evaluates the project's potential direct, indirect, and cumulative effects on all residents within the project area, including, but not limited to, surrounding neighborhoods, minorities, low-income individuals, older adults, individuals with limited English proficiency, zero-car households, adults with disabilities, and children. In addition, environmental commitments have been incorporated into the project to minimize and mitigate unavoidable impacts and to provide additional enhancements for local communities.	
		B-188-2	03/08/2024 - Specifically: 1. On the Ohio side, there have been no accommodations to mitigate the noise and pollution impacts to residents of downtown, specifically in the Historic West 4 th St District. Please take steps to shield downtown residents from noise and pollution.	ODOT evaluated noise for Refined Alternative I (Concept I-W) and documented the results in a <u>Noise</u> <u>Analysis Report</u> (October 2023). The Ohio analysis identified noise impacts at an apartment building, which is in the same block of 4 th Street that was referenced by the commenter. Noise barriers were evaluated for the apartment building but were not found to be feasible or reasonable per ODOT's noise policy. Noise impacts were identified for this apartment building because the sound levels in both the existing (2029) condition and the proposed (2049) conditions exceed noise abatement criteria established by FHWA. Although noise levels are higher than established noise abatement criteria for both the existing and proposed conditions, Refined Alternative I (Concept I-W) will only increase noise levels in this area by a maximum of 1.3 decibels. According to ODOT's noise policy, the average person cannot detect an increase or decrease in sound pressure level of less than 3 decibels. Therefore, while noise mitigation is not proposed in the area referenced by the commenter, Refined Alternative I (Concept I-W) is not anticipated to create a perceptible increase in noise levels in this area.	Noise – Ohio (4.8.2) Air Quality (4.6)



ID	Name	No.	Comment	Response	Reference ¹
				Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone.	
				KYTC and ODOT also conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. The results are documented in a <i>Quantitative MSAT Analysis Report</i> (<i>August 2023</i>), which concluded that the emissions for all analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no-build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build scenario. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no-build scenarios is not considered to be significant, and Refined alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions.	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios using MOVES and travel demand models for the project's approved certified traffic. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the	



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				area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-188-3	03/08/2024 - 2. Moreover, I believe the design does not adequately slow vehicles entering/exiting the downtown street grid as they transition to/from the interstate or local expressways. Please implement design features to ensure traffic has been slowed prior to entering the street grid and does not accelerate until they have departed the downtown street grid.	During detailed design of Phase III of the Brent Spence Bridge (BSB) Corridor Project, the final geometry and design speeds of the collector-distributor roadways will be established in accordance with ODOT, KYTC, and FHWA requirements and procedures. Ramp connections with local streets are being designed as lower-speed urban roadways, which will encourage drivers to decelerate to safe speeds prior to reaching the local street system.	Design Criteria (3.4) Future Design Refinements (3.7)



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				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. One of the design-build contract objectives that will be considered during the evaluation of innovation concepts includes building the project with a context sensitive design that fits within the community. Consistent with that objective, the design of the ramps between the collector-distributor system and the local street network will be further evaluated during the innovation period to develop designs that promote traffic calming and lower speeds as vehicles enter the urban core and connect to the local street network.	
		B-188-4	03/08/2024 - 3. What still remains unclear to me is how there is a need to increase the capacity from a current 8 lane capacity to a combined 16 lanes of capacity between the new bridge and the collector-distributor. When traffic counts have been declining for years, I do not see why there is a need to increase capacity at all. But to double the lanes crossing the river is absolutely excessive and a gross overreach of tax payer dollars. 6 lanes of collector-distributor crossing the river is wildly excessive. The user count on the CD over the river will be sparsely used at best.	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT, KYTC, and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI). Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum (December 2023)</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals,	Traffic (3.8)

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				households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods. Traffic projections prepared during the preparation of the 2012 EA estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	
		B-188-5	03/08/2024 - I am concerned this will be a drain of maintenance funds as well as result in excessive speeding and other risky maneuvers by drivers.	KYTC and ODOT will be responsible for maintaining the project after work is completed. Maintenance will be part of ODOT's and KYTC's normal operating procedures, and funding will be set aside as part of each state's budgetary process. In addition, ODOT and KYTC have established <i>Transportation Asset Management Plans</i> that describe how each state manages its assets. The maintenance of the BSB Corridor Project will be in accordance with each state's <i>Transportation Asset Management Plan</i> . The design of Refined Alternative I (Concept I-W) was developed in accordance with the most current versions of the KYTC <i>Highway Design Guidance Manual</i> and the	Funding (1.2.1) Design Criteria (3.4) Traffic (3.8) Refined Alternative I (Concept I-W) and Purpose and Need (3.9)



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				ODOT <i>Location and Design Manual</i> . The speed limits on I-71/I-75 and the collector-distributor roadways will be established in accordance with current laws and design standards and processes.	
				Refined Alternative I (Concept I-W) will improve safety on the roadways in the project area by including measures to reduce congestion-related crashes. In addition, the collector-distributor roadway system will improve safety by separating through and local traffic and keeping them separate for longer distances, thus reducing weaving movements that increase the risk of crashes. The removal of left-hand exits and other design deficiencies such as substandard shoulders are also expected to improve safety and reduce crashes by further reducing weaving movements and by providing a larger buffer for vehicles. The <u>Interchange Modification Study Addendum</u> documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's Interactive Highway Safety Design Model.	
		B-188-6	03/08/2024 - Please adequately abate these concerns with a reduction in lanes or fully close the Clay-Wade-Baily bridge to vehicle traffic, converting it fully to pedestrian and bike users. Then, all Clay-Wade-Baily vehicles will use the CD to maneuver between Cincinnati and Covington.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that the number of lanes included in Refined Alternative I (Concept I-W) is necessary to meet the project purpose and need.	Purpose and Need (2.) Future Design Refinements (3.7) Travel Patterns and Access
				Closing the Clay Wade Bailey Bridge to vehicular traffic would not support the project purpose and need. The Clay Wade Bailey Bridge services as a key local connector between the cities of Covington and Cincinnati. It also supports the resilience of the local and regional transportation network by providing additional options for crossing the Ohio River. Preliminary investigations indicate that adding bike lanes to the Clay Wade Bailey Bridge may be feasible. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build	(4.1.4) Public Comment Outcomes (5.1.2)



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				team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. KYTC and ODOT have committed to evaluate reconfiguring the lanes on the Clay Wade Bailey Bridge to add bicycle lanes during the innovation process.	
		B-188-7	03/08/2024 - 4. Please work to reduce the curviness of the ramp network between 71, 75, 50, and all contributing ramps on the Ohio side. At present, there is still a lot of wasted space being allocated to accommodate the curves which causes the width of the right of way to be unnecessarily increased. Please reduce this to be as small as possible by straightening the alignment.	The design of Refined Alternative I (Concept I-W), including the layout of the ramp network in downtown Cincinnati, was developed in accordance with the most current versions of the KYTC <i>Highway Design Guidance</i> <i>Manual</i> and the ODOT <i>Location and Design Manual</i> . KYTC and ODOT have worked to incorporate several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land formerly occupied by the dunnhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts during the project's Phase III progressive design-build contract include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	Design Criteria (3.4) Future Design Refinements (3.7)
		B-188-8	03/08/2024 - 5. On the Kentucky side, there is a net loss of land in Gobel Park. This is a treasured and unique community asset. Moreover, the highway is expanding closer into the park which will contribute noise and detract	Refined Alternative I (Concept I-W) will acquire 2.84 acres of permanent right-of-way, including 360 feet of walking trails, two basketball courts, and associated resources from the Goebel Park Complex. KYTC has worked with the City of Covington to develop mitigation measures for	Goebel Park Complex (4.13.3)



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			from the visual aesthetics of the park. Please fully conceal visually and audibly all indications of the highway from Gobel Park. Imagine creating so incompatible with surrounding land uses that a giant wall with marginal impact at best has been created.	unavoidable impacts to the Goebel Park Complex. Impacts will be mitigated through the provision of 2.23 acres of replacement land; reconstruction of the walking trail within the complex; and a financial commitment from KYTC for the development of a new Goebel Park Complex Master Plan, replacement and enhancement of the basketball courts or other outdoor recreation facilities within the park, and a relocated outdoor pool and associated facilities or other comparable aquatic facility serving the same purpose within the park. Proposed noise/visual screening barriers will provide enhanced noise reduction and improve the viewshed in the Goebel Park Complex due to the incorporation of aesthetic treatments on the barriers. During detailed design, KYTC has committed to coordinating the composition of the barriers with the City of Covington to determine where transparent noise barriers would be beneficial to preserve views of Goebel Park from the highway, particularly the Clock Tower located in the center of the park. In addition, the separation of interstate runoff from the combined sewer system will reduce	
		B-188-9	03/08/2024 - 6. At best, I support the Bridge Forward vision and request that their vision and design be implemented to the fullest extent possible, including the goals of providing minimized connection distances across the interstate at all points, increase the connection points, for pedestrians and bikers across the interstate, and improve the quality of life of the host neighborhoods.	flooding and combined sewer overflows in the complex. Refined Alternative I (Concept I-W) meets the project purpose and need and maintains or improves existing local connections. In addition, features incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward. These include minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices. Features incorporated into Refined Alternative I (Concept I-W) include reconfiguring the river crossing to use the existing BSB for local traffic as part of the collector-distributor roadway system and a new double- decker companion bridge to the west for through (interstate) traffic. In addition, performance-based design	Purpose and Need (2.) Alternatives (3.) Future Design Refinements (3.7) Public Comments (5.1.1)



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				principles have been incorporated into the design of Refined Alternative I (Concept I-W), substantially reducing the project's footprint and associated impacts. Multimodal facilities have been incorporated into Refined Alternative I (Concept I-W), and KYTC and ODOT are continuing to coordinate the project with the cities of Cincinnati and Covington to address local concerns while further reducing the highway's footprint and impacts to the communities in the project area. Finally, Refined Alternative I (Concept I-W) reconfigures the ramps in downtown Cincinnati to open up approximately 10 acres of land for potential redevelopment and/or public use directly adjacent to the Cincinnati Central Business District.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary (January 2024)</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
		B-188-10	03/08/2024 - 7. Finally, I request a full Environmental Impact Study be conducted due to the supplemental EIS not adequately abating the concerns of the local communities that host this interstate and the ensuing 8 years of construction.	The supplemental EA has been prepared consistent with 23 CFR §§ 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional NEPA reevaluation and coordination efforts that have occurred since the 2012 EA/FONSI. The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and	Introduction (1.) Social and Economic Resources (4.1) Construction Impacts (4.11) Environmental Commitments (Section 6. and ES-Table II)



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				federal requirements. The supplemental EA evaluates the project's potential direct, indirect, and cumulative effects on all residents within the project area, including during construction. In addition, environmental commitments have been incorporated into the project to minimize and mitigate unavoidable impacts and to provide additional enhancements for local communities.	
				The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	
		B-188-11	03/08/2024 - P.S. Why is the comment field on this form only 3 lines long? This is purposefully discouraging meaningful, thoughtful comments from the public.	It is unclear what comment field is being referenced by the commenter. The format utilized to submit this specific comment allowed for an unlimited number of characters, as did all platforms for submitting electronic comments. Printed comment forms provided greater than three lines for comments and prominently featured the following statement: "Please attach additional pages if needed."	N/A
B-189	Nightingale, Jeanne	B-189-1	03/08/2024 - I have reviewed your study of environmental impacts, and I would like to make a suggestion to minimize further impacts on air and water quality, native habitat, safe stormwater runoff, aesthetic quality of bridge footprint, plus environmental justice concerns.	Environmental commitments have been incorporated into the project to minimize and mitigate unavoidable impacts and to provide additional enhancements for local communities, including environmental justice communities. These include measures to mitigate temporary air quality impacts during construction, protect water quality, and mitigate for the removal of habitat for federally and state threatened or endangered species. Enhancements incorporated into the project include the separation of all interstate stormwater runoff in the project area from existing combined sewer systems and the incorporation of aesthetic treatments throughout the	Environmental Commitments (Section 6. and ES-Table II)



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				corridor. A complete list of the mitigation and enhancement measures incorporated into Refined Alternative I (Concept I-W) is provided in the supplemental Environmental Assessment.	
		B-189-2	03/08/2024 - From reading your assessment of environmental impacts, it is the view of many of us that your are not sufficiently addressing the consequences of global climate change which will have dire impacts in the near future.	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic.	Greenhouse Gases and Climate Change (4.7)
				Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The	



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				design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
		B-189-3	03/08/2024 - We recommend considering the use of Grassed Swales as a landscape feature along the built sites of the bridge. These dedicated green areas will be used instead of dense urban re development which will only add to adverse environmental and health impacts through heat-island effects. Grassy swales consists of green infrastructure used commonly along public roadways and bridge intersections as a low cost remedy that produces maximal results. https://lakesuperiorstreams.org/stormwater/tool kit/swales.html A grassed swale is a graded and engineered landscape feature appearing as a linear, shallow, open channel with trapezoidal or parabolic shape. The swale is vegetated with flood tolerant, erosion resistant plants Function as a linear wetlands - Reduce peak flows and runoff velocity and promote infiltration Reduce erosion Are easy to design. Can be built in relatively impervious soils or in seasonally saturated soils or intersecting water table - Trap and remove sediments and other pollutants with increased efficiency and thus improve water quality Create visually appealing and beneficial habitat between uplands and surface waters - Are less expensive to build and maintain than a traditional curb and gutter system - Provide effective pretreatment of stormwater passing through for further processing by additional stormwater management practices. The design of grassed swales promotes the conveyance of storm water at a slower, controlled rate and acts as a filter medium removing pollutants and allowing stormwater infiltration. When properly	The drainage infrastructure for the Brent Spence Bridge (BSB) Corridor Project will be designed in accordance with the most current versions of the KYTC <i>Highway Design Guidance Manual</i> and the ODOT <i>Location and Design Manual</i> . ODOT and KYTC are working to improve water quality through stormwater runoff management across all projects in their respective states. In northern Kentucky, transportation projects must address the quantity of stormwater runoff by separating interstate runoff from combined sewer systems. While only runoff from new impervious area is required to be separated, KYTC will separate all interstate runoff from the existing combined sewer system. In the Cincinnati area, transportation projects must address both the quantity and quality of stormwater runoff from combined sewer system. In the Cincinnati area, transportation projects must address both the quantity and quality of stormwater runoff from combined sewer systems and providing measures known as best management practices (BMPs) to reduce stormwater pollutants. The project will separate highway drainage from the existing combined sewer system in Ohio, and ODOT will partner with the Metropolitan Sewer District of Greater Cincinnati to build infrastructure to drain directly to Mill Creek and/or the Ohio River. To address water quality treatment requirements in Ohio, vegetated options for stormwater BMPs will be utilized to the maximum extent practicable. Given the dense urban land use in the project area, providing vegetative swales in the BSB corridor in Ohio would require additional impacts to surrounding properties. Therefore, the majority of the stormwater BMP treatment requirements will be addressed via off-site mitigation. In late 2022, ODOT and Ohio Environmental Protection Agency began discussions regarding providing offsite mitigation at a 1.5:1 ratio in the I-74 median within the same watershed as Phases I and II of the BSB Corridor Project. The technical review of the	Design Criteria (3.4) Utilities (4.12.1)

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			designed to accommodate a predetermined storm event volume, a grassed swale results in a significant improvement over the traditional drainage ditch in both slowing and cleaning of water. In swales, stormwater is slowed by strategic placement of check-dams [446 KB pdf file], new window] that encourage ponding and these ponds in turn facilitates water quality improvements through infiltration, filtration and sedimentary deposition. Collected stormwater is expected to drain away through the soil within several hours or days.	offsite mitigation will be completed during detailed design, and ODOT will continue to coordinate with Ohio Environmental Protection Agency as each project phase progresses through detailed design. Finally, KYTC and ODOT have incorporated environmental commitments into the project that require the resident engineer and contractor to develop BMPs prior to onsite activities to ensure continuous erosion control throughout the construction and post-construction period.	
		B-189-4	03/08/2024 - We further recommend – with an eye on the lifetime of the bridge and given the prospect of fewer private automobiles – providing a dedicated lane on the bridge for public transport.	Refined Alternative I (Concept I-W) does not include dedicated lanes for buses. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	Travel Patterns and Access (4.1.4)
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
B-190	Meyer, David	B-190-1	03/08/2024 - The traffic projections are showing a predicted 40% increase in traffic out to 2050. With the recent data suggesting that traffic is decreasing, the projections should probably be revisited. Even if they aren't revisited, the project seems to be doubling (or	Existing and historic traffic counts for the Brent Spence Bridge (BSB) were compiled using a variety of data generated by ODOT, KYTC, and the Ohio-Kentucky- Indiana Regional Council of Governments (OKI). Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to	Traffic (3.8)



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			more) lanes for a 40% traffic increase. This seems like a gross overdesign in an urban area where the impacts to overdesign are severe. Please reduce the number of lanes. The great thing is, doing so will reduce the cost.	factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre- COVID base year of 2019. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum (December 2023)</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projectors, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods. Traffic projections prepared during the preparation of the 2012 Environmental Assessment estimated that 197,000 vehicles per day would travel across	



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				certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	
B-191	Koenig, Eric	B-191-1	03/08/2024 - If we could we should tear this highway out and divert the traffic around the city basin. This roadway's original construction destroyed communities, it continues to be a source of immense pollution contributing to the city's ozone issues in warm months, these pollutants are concentrated in areas where the most impoverished and susceptible populations to asthma in our city reside.	The project's purpose and need includes improving traffic flow and levels of service, improving safety, and correcting geometric deficiencies. Under the existing conditions, there are not enough lanes on I-71/I-75 to serve all the traffic attempting to travel through the corridor. As a result, the area serves as a bottleneck that constrains the number of vehicles that can pass through during peak periods, resulting in slowed traffic and backups across the Brent Spence Bridge (BSB). Traffic data for the project was developed using the Ohio- Kentucky-Indiana (OKI) Regional Council of Governments regional travel-demand model, which assigns routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. The regional travel demand model indicates about 70 percent of the traffic in the BSB corridor has origins and destinations north of the I-71/I-75 split in Kentucky and south of I-275 in Ohio. Alternatives that remove the highway and divert all traffic would not address congestion for the high proportion of local traffic utilizing the BSB corridor.	Purpose and Need (2.)
				The BSB corridor is a major route for regional and local mobility. Regionally, the BSB carries both I-71 and I-75 traffic over the Ohio River and connects to I-74, I-275, and US-50. The BSB corridor also facilitates local travel by providing access to Covington in Kentucky and downtown Cincinnati in Ohio. Alternatives that remove the highway would divert traffic away from, rather than maintain, connections to key regional and national transportation corridors.	



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				Given the above, diverting traffic would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project.	
		B-191-2	03/08/2024 - If we cannot tear this roadway out and restore our city, we need to minimize its food print and its affects on those living near it. This includes caps/tunnels and sound walls to minimize sound and particulate pollution.	Environmental commitments have been incorporated into the project to minimize and mitigate unavoidable impacts and to provide additional enhancements for local communities. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements. In addition, KYTC and ODOT have worked to incorporate several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land formerly occupied by the dunnhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Air Quality (4.6) Noise (4.8) Public Comment Outcomes (5.1.2) Environmental Commitments (Section 6. and ES-Table II)



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				ODOT and KYTC have considered options for capping I-75 in Ohio, which is documented in the <u>Public</u> <u>Involvement Summary</u> (January 2024). Freeway caps were not found to be feasible due to issues related to traffic operations, safety, geometric design, accommodating local connections, and impacts to surrounding land uses.	
				KYTC and ODOT evaluated noise for Refined Alternative I (Concept I-W) in accordance with their respective state noise policies. As a result of those studies, KYTC is proposing seven noise barriers to mitigate noise impacts in Kentucky, and ODOT is proposing five noise barriers to mitigate noise impacts in Ohio. Recognizing from neighborhood outreach efforts that traffic noise is a primary concern of area residents, KYTC conducted technical studies to evaluate additional noise/visual screening barriers where noise impacts were predicted but noise barriers were not warranted. Based on the technical feasibility and public comments received during outreach activities, KYTC is proposing two additional noise/visual screening barriers in Kentucky.	
				In accordance with the KYTC <i>Noise Analysis and</i> <i>Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from proposed noise barriers and noise/visual screening barriers during the detailed design phase of the BSB Corridor Project. In accordance with the ODOT <i>Analysis and Abatement of Highway Traffic Noise</i> <i>Policy Statement</i> , ODOT will conduct noise abatement public involvement with property owners and tenants who would benefit from proposed noise barriers in Ohio during the detailed design phases of the project.	
				Construction noise is expected to generate temporary noise impacts on adjacent and nearby properties, particularly those in residential land use. During construction, the project team has committed to incorporating proactive and reactive measures to address construction noise. This will be accomplished through equipment selection and maintenance, potential	



ID	Name	No.	Comment	Response	Reference ¹
				screening/shielding/barriers, scheduling of work, education of staff, and the development and implementation of the project's communication plan.	
				Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5. To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of PM2.5 for 2020 existing, 2050 no-build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring	



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				program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
B-192	Park, Robert	B-192-1	03/08/2024 - There are four foundational concerns regarding the proposed designs for the BSB project: 1. Excessive capacity: 16 lanes represent a 100% increase; 12 lanes (50% increase) would be appropriate for any reasonably projected capacity need.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected population and employment growth are also incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <i>Interchange Modification Study Addendum</i> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
		B-192-2	03/08/2024 - 2. No allowance for public transit lanes: bus rapid transit (BRT) or light-weight commuter rail (NOT freight rail).	In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, neither bus rapid transit nor passenger rail would meet the project purpose and need, and they are not considered to be reasonable alternatives for the BSB Corridor Project.	Purpose and Need (2.) Travel Patterns and Access (4.1.4)
				The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	
				Refined Alternative I (Concept I-W) does not include dedicated lanes for buses. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment (EA). Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths,	



ID	Name	No.	Comment	Response	Reference ¹
				and bicycle lanes will enhance connections to existing bus stops.	
		B-192-3	03/08/2024 - 3. No consideration of one-way bridge traffic, for example make the old bridge one-way going north and the new bridge one- way going south (together with two north/south transit lanes).	The alternatives analysis completed during the development of the 2012 EA and Finding of No Significant Impact (FONSI) for the BSB Corridor Project considered 25 configurations for moving traffic across the Ohio River, including the no-build condition. The alternatives evaluation concluded that there is not sufficient capacity on the existing BSB to accommodate all northbound or southbound traffic in the corridor. The alternatives evaluation for the BSB Corridor Project was documented in the 2012 EA and remains applicable to the project. Reevaluations completed in 2015 and 2018 concluded that the 2012 FONSI remained valid. The concept of accommodating all northbound traffic on one bridge and all southbound traffic on the other bridge was considered during a performance-based design workshop held in December 2019. However, the concept was not investigated further due to concerns that the existing BSB could not accommodate the necessary traffic volumes while still addressing geometric deficiencies such as the lack of shoulders on the existing bridge. The selected alternative described in the 2012 EA/FONSI	Project History (1.2) Additional Refinements (3.3)
				The selected alternative described in the 2012 EA/FONSI provided a new companion bridge that accommodated traffic traveling in opposite directions on the lower deck and separated on the upper deck. This traffic configuration required a center median with associated shoulders and center bridge supports. Refined Alternative I (Concept I-W) reconfigures how traffic will travel across the Ohio River. Traffic will travel in only one direction on each deck of the new companion bridge, which eliminates the need for a center median and center bridge supports. These refinements allowed the width of the new companion bridge to be reduced from 172 feet to 107 feet, substantially reducing the project footprint and costs.	



ID	Name	No.	Comment	Response	Reference ¹
				Although Refined Alternative I (Concept I-W) does not include dedicated lanes for buses, the project is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
		B-192-4	03/08/2024 - 4. Unlike for Covington, there has been no commitment to include a trunk stormwater line along the I-75 corridor which would permit very significant opportunities for stormwater management, including sewer separation. At present for large areas of the city approaching the Ohio River there is almost no infrastructure that conveys stormwater uncontaminated with sanitary sewerage to natural waterways as opposed to sewer treatment facilities.	ODOT and the Metropolitan Sewer District of Greater Cincinnati (MSD) have held multiple coordination meetings to discuss drainage design for the BSB Corridor project. The stormwater system along the BSB corridor in Ohio will be completely replaced, and the new system will be designed to meet current ODOT standards. The project will separate highway drainage from the existing combined sewer system in Ohio, and ODOT will partner with MSD to build infrastructure to drain directly to Mill Creek and/or the Ohio River.	Utilities (4.12.1
		B-192-5	03/08/2024 - At an earlier BSB open house, when asked about the one-way option, one of the lead design officials claimed that the old bridge with 4 lanes on each deck could not be feasibly integrated into the design if one-way. Well, now the design there calls for 3 lanes on each deck. A twelve-lane design with a one- way configuration would greatly simplify the ramp design, at lower cost, with smaller project foot-print, yet was never considered in any of the many design options reviewed.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. The <u>Interchange</u> <u>Modification Study Addendum</u> concluded that the number of lanes included in Refined Alternative I (Concept I-W) is necessary to meet the project purpose and need. The concept of accommodating all northbound traffic on one bridge and all southbound traffic on the other bridge was considered during the alternatives evaluation for the 2012 EA and during a subsequent performance-based design workshop. These activities concluded that the existing BSB cannot accommodate the necessary traffic volumes while still addressing geometric deficiencies such as the lack of shoulders on the existing bridge.	Project History (1.2) Additional Refinements (3.3) Traffic (3.8)
		B-192-6	03/08/2024 - This preferred design would also make feasible and affordable the deck over I-	ODOT and KYTC have considered options for capping I-75 in Ohio, which is documented in the <u>Public</u> <u>Involvement Summary</u> (January 2024). Freeway caps were not found to be feasible due to issues related to	Public Comment



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			75 in downtown Cincinnati that others have advocated.	traffic operations, safety, geometric design, accommodating local connections, and impacts to surrounding land uses.	Outcomes (5.1.2)
		B-192-7	03/08/2024 - The Governor of Ohio has publicly deferred to Cincinnati interests on the BSB design choices. The Hamilton County Board of Commissioners has deferred to the City Council. Making the wrong decisions here risks creation of a massively disruptive and expensive white elephant that fails to deliver on the full potential benefits of the new bridge.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several refinements into the project's design, including reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75; and incorporating aesthetic treatments throughout the corridor. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT, including ideas proposed by the City of Cincinnati. Innovations that improve project quality, reduce costs, shorten schedule, support design-build contract objectives, and have support at the local level may be incorporated into the project.	Purpose and Need (2.) Alternatives (3.) Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2) Public Comments (5.1.1)
		B-192-8	03/08/2024 - Ignoring the stormwater opportunity when the city and county are under a federal consent decree to address the problem is a major policy lapse.	Both KYTC and ODOT are separating all interstate runoff in the BSB corridor from existing combined sewer systems. KYTC and ODOT have committed to further coordinating stormwater details with local municipalities and their respective sanitary and sewer districts during the final design phases of the project.	Utilities (4.12.1)
B-193	Wood, Brendan	B-193-1	03/08/2024 - Please do the following: 1) Conduct a full environmental study	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130	Introduction (1.)



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				and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	
		B-193-2	03/08/2024 - 2) Reconnect the city grid	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. In addition, KYTC and ODOT are continuing to coordinate local connections with the cities in the project corridor. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors.	Future Design Refinements (3.7) Travel Patterns and Access (4.1.4)
				Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge (BSB) Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: improving neighborhood connectivity across the	



ID Nan	ne No.	Comment	Response	Reference ¹
			interstate; and building the project with a context sensitive design that fits within the community.	
	B-193-3	03/08/2024 - 3) Minimize added lanes Highway expansion has been proven to induce demand and worsen congestion. This would work directly against the 1 st purpose of the project and will negatively impact the citizens of the region. Many things have changed since the original study was conducted in 2012 and the traffic projections have been proven repeatedly to be inflated.	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT, KYTC, and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI). Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum (December 2023)</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange</u> <i>Modification Study Addendum</i> concluded that Refined	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
				Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
				Traffic projections prepared during the preparation of the 2012 EA estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	
		B-193-4	03/08/2024 - The original highway project destroyed large swathes of downtown Cincinnati, and this project has a chance to repair a small part of that. Focus on reconnecting Queensgate with the rest of downtown Cincinnati by improving the street grid that has been interfered with by the highway.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to benefit the surrounding communities, including reducing the project footprint, reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; incorporating aesthetic treatments throughout the corridor; and providing new and rebuilt sidewalks, shared-use paths, and/or bike lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods in Ohio. Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	Purpose and Need (2.) Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2) Travel Patterns and Access (4.1.4) Public Comments (5.1.1)

ID	Name	No.	Comment	Response	Reference ¹
				During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating concepts that are consistent with design-build contract objectives to improve neighborhood connectivity across the interstate and build the project with a context sensitive design that fits within the community.	
		B-193-5	03/08/2024 - Given that this project will inevitably happen given the poor state of the Brent Spence bridge & the political pressure to make this happen, minimize the number of additional lanes by replacing the Brent Spence bridge instead of adding the new bridge as a companion bridge. One more lane (or 5 in each direction in this case) will not solve our traffic challenges.	In 2015, as part of continuing value engineering efforts, KYTC and ODOT developed a concept (called Whiz Bang Concept 4) that eliminated the existing BSB and placed all traffic on a new double-decker bridge to the west. The bridge would have eight lanes on each level, with interstate and local traffic separated on the structure in five and three lanes, respectively. This concept was evaluated for traffic operations, local connectivity in Kentucky, and cost. The analysis determined the existing BSB has a long remaining life, and removing it to build a wider companion bridge would not be cost effective. Therefore, Whiz Bang Concept 4 was removed from further study in October 2019. The <u>Interchange Modification Study Addendum</u> concluded that the number of lanes included in Refined Alternative I (Concept I-W) is necessary to meet the project purpose and need.	Development of Refinement Concepts (3.2) Traffic (3.8)
B-194	Butler, Matt	B-194-1	 03/08/2024 - Please find attached four documents to be included as public comment on the SEA for the Brent Spence Corridor Expansion Project. 1. CTSD SEA Comments with Maps 3-8- 2024.pdf 2. Letter-to-FHWA.pdf (Title VI letter) 3. Letter-to-FHWA Followup with census maps.pdf 4. Public Comments on the BSB Project to Cincinnati City Council 3-8-2024 9-46AM.pdf 	Responses to the comments presented in Attachment 1 are provided below. Attachment 2 is a copy of a January 31, 2023 letter to FHWA from the Coalition for Transit and Sustainable Development. The concerns raised in the January 2023 letter from the Coalition for Transit and Sustainable Development were addressed during the project's National Environmental Policy Act (NEPA) review. Details regarding how those concerns were addressed were provided in the supplemental Environmental Assessment (EA) and the <u>Public Involvement Summary</u> (January 2024). A copy of the Coalition for Transit and Sustainable	Public and Stakeholder Involvement (5.1) Public Hearing (5.5)



ID	Name	No.	Comment	Response	Reference ¹
			Sustainable Development, thank you for your	Development letter is also provided in Appendix I of the <u>Public Involvement Summary</u> .	
			attention to this matter.	Attachment 3 is a copy of a letter dated May 10, 2023 to follow up on prior correspondence. The FHWA Office of Civil Rights is responding as part of a separate process. Therefore, no response, other than to document the attachment as received, is provided.	
				Attachment 4 included copies of 155 individual submissions which are titled "Comments to Cincinnati City Council Regarding the Brent Spence Corridor Project." Therefore, no response, other than to document the attached documents as received, is provided.	
				KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including those provided by the City of Cincinnati, prior to FHWA making a final decision on the supplemental EA. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	
		B-194-203/08/2024 - These comments are submitted by the Coalition For Transit and Sustainable Development in response to the Supplemental Environmental Assessment (SEA) for this Project dated January 12, 2024. For the reasons set forth below, we believe that a full Environmental Impact Statement (EIS) is required for this Project.The purpose of an environmental assessment is to determine whether a proposed agency action will have significant impacts on the human or natural environment, in which case a full Environmental Impact Statement is required.	The supplemental EA has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional NEPA reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. Updated studies include: new	Introduction (1.) Development of Refinement Concepts (3.2) Additional Refinements (3.3) Traffic (3.8) Environmental Justice (4.1.7) Greenhouse Gases and	

ID	Name	No.	Comment	Response	Reference ¹
			Introduction: The Federal Highway Administration determined back in August of 2012 that the then preferred alternative would have no significant impact on the human or natural environment. Almost a dozen years have passed since then, and much has changed over that time. The projected increases in traffic volume that were used then to justify the need for adding a new 10-lane bridge across the Ohio River have not occurred. The combination of the covid epidemic and the widespread adoption of video technology for working virtually has reduced commuting traffic volumes. Scientific knowledge and understanding of the impacts of greenhouse gas emissions has advanced, as has recognition of the need to reduce such emissions in order to limit the magnitude of the enormous risks and harms resulting from climate change. Federal policies to address racial and ethnic inequity and disparities, including environmental injustice, have been strengthened. Moreover, the currently preferred alternative has changed in numerous ways from what was evaluated in 2012.	traffic projections and an <u>Interchange Modification Study</u> <u>Addendum</u> (December 2023), a new greenhouse gas emissions and climate change analysis, an <u>Environmental</u> <u>Justice Analysis Report</u> (January 2024). In addition, detailed descriptions of the refinements incorporated into the project since the 2012 EA/FONSI are provided in the supplemental EA, and further supporting documentation is provided in its appendices. The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR §§ 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	Climate Change (4.7) Project Refinements (Appendix A)
		B-194-3	 03/08/2024 - About a year ago, the Environmental Protection Agency on February 15, 2023, raised a number of serious concerns over a preliminary draft of the Supplemental Environmental Assessment: "Determining the appropriate level of NEPA analysis is FHWA's decision and responsibility. EPA is not requesting an EIS based on materials provided to date. Pursuant to CEQ NEPA regulations (40 CFR 1501.6), if FHWA is unable to mitigate impacts to a less than significant and reach a defensible mitigated Finding of No Significant Impact (FONSI), then 	The U.S. Environmental Protection Agency (USEPA) is a federal cooperating agency for the Brent Spence Bridge (BSB) Corridor Project. FHWA held regular coordination meetings for federal participating and cooperating agencies throughout the development of the supplemental EA. Cooperating agencies were afforded the opportunity to review and provide comments on multiple drafts of the supplemental EA. FHWA has addressed all comments received from federal cooperating agencies have been notified of the opportunity to offer feedback on the supplemental EA during the public availability period, and individual	Participating & Cooperating Agencies (5.4)



ID	Name	No.	Comment	Response	Reference ¹
			 an EIS would be required. EPA is concerned with potentially significant construction and operational air quality and noise impacts on low-income and minority communities that have already experienced longstanding environmental impacts from I-71/I-75. EPA is also concerned with impacts from induced travel demand, induced development/growth, and direct and indirect releases of greenhouse gases. On January 9, 2023, Council on Environmental Quality (CEQ) published interim guidance to assist federal agencies in assessing and disclosing climate change impacts during environmental reviews. See https://www.federalregister.gov/documents/202 3/01/09/2023-00158/national- environmental-policy-actguidance-on-consideration-of-greenhouse-gas-emissions- and-climate for further information." While the Supplemental Environmental Assessment addresses some of these issues, it totally misses the mark on some, and it is incomplete, insufficient or misleading as to others. 	responses will be prepared for any comments received from participating and cooperating agencies.	
		B-194-4	03/08/2024 - It cannot support a Finding of No Significant Impacts (FONSI). Reasonable alternatives were not considered, a number of important impacts were not considered at all, others were inadequately considered, and some of the impacts of the project that were identified are not to be mitigated. As a result, a finding of no significant impacts cannot be made, and an EIS must be prepared.	The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	Introduction (1.)
		B-194-5	03/08/2024 - ODOT's obligation to take affirmative action to mitigate prior discriminatory harms: Construction of the original I-75 project through a predominantly	Refined Alternative I (Concept I-W) was evaluated for cumulative effects specific to environmental justice (EJ) populations in accordance with the U.S. Department of Transportation Order 5610.2C and FHWA 6640.23A,	Environmental Justice (4.1.7)



ID	Name	No.	Comment	Response	Reference ¹
			Black community concluded in 1963 and created ongoing disproportionate negative impacts on low-income communities and communities of color. The ODOT application for federal funding under the Multimodal Project Discretionary Grant program shows that the entire project impact area in the state of Ohio is made up of areas designated as Areas of Persistent Poverty, Historically Disadvantaged Communities, or both. Of note, the West End neighborhood is designated as both a Historically Disadvantaged Community and an Area of Persistent Poverty, and it was this neighborhood that was most severely impacted by the razing of properties during the initial construction of the interstate in the City of Cincinnati. Where prior discriminatory practice or usage has tended to subject individuals to discrimination under any program or activity to which Title VI applies, the applicant or recipient, in this case ODOT, "must take affirmative action to remove or overcome the effects of the prior discriminatory practice or usage." 49 C.F.R. § 21.5(b)(7).	 which define disproportionately high and adverse effects. The EJ analysis also followed FHWA's <i>Guidance on</i> <i>Environmental Justice and NEPA</i> (December 16, 2011). Refined Alternative I (Concept I-W) will result in a minor contribution to cumulative residential and commercial displacements and a cumulative loss of parkland and historic resources in these communities. These minor cumulative effects will be experienced by all populations and communities, including EJ populations and non-EJ populations. Cincinnati's West End, now partitioned into the Queensgate and West End neighborhoods, is an area with known EJ populations that was historically impacted by urban renewal plans that were common in the United States in the mid-twentieth century. Refined Alternative I (Concept I-W) requires one commercial relocation (a small printing shop) in the West End neighborhood. In addition, the footprint of Refined Alternative I (Concept I-W) has been reduced and requires only minor amounts of strip right-of-way in the West End neighborhood. Refined Alternative I (Concept I-W) has been reduced and requires only minor amounts of strip right-of-way in the West End neighborhood. Refined Alternative I (Concept I-W) will not add to or exacerbate any adverse effects in the West End community from prior actions or events. In recognition of the history of City-sponsored urban renewal and the original Mill Creek Expressway (I-75) construction and as an enhancement in the West End neighborhood, ODOT will work with the City of Cincinnati, which includes the West End Community Council, to develop content for an interpretive display describing the West End community in relation to historic City urban renewal and the Millcreek Expressway construction and to identify a location in proximity to the I-75 corridor to install the display. Refined Alternative I (Concept I-W) will improve community cohesion; improve traffic flow and safety for all modes of travel; improve air quality; abate noise; reduce floodi	Cumulative Effects (4.10.2)



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				no adverse cumulative effects on EJ populations are expected to occur as a result of Refined Alternative I (Concept I-W), and a determination of disproportionately high and adverse effects is not warranted.	
		B-194-6	03/08/2024 - EPA's Environmental Justice Screening Tools Demonstrate the Ongoing Harm to These Communities: The SEA, at page 75, sets forth the DOTs" EJ Study Area. Interestingly, that Study Area diverges as far from the Construction area as approximately 2.5 miles to the east and 2 miles to the southeast to include all of Census Blocks, 35,36, 44, 45, 46, 52, 53, 54, 62, 68. (each of which are designated as non-EJ blocks). Meanwhile, EJ Blocks 1, 4, and 63 line the entire western edge of the Construction zone in Ohio, and all of EJ Block 63 hugs a significant length of the western edge in Kentucky. In Ohio, on the east side of the Construction zone, EJ Blocks 5, 6, 11. 14, and 24 are immediately adjacent and line the great majority of its length, and EJ Blocks 12 and 13 fall within ¼ and ½ mile east of the Construction zone. In Kentucky, EJ Blocks 39, 47, and 64 lie immediately adjacent to the east side of the Construction zone, It should not need to be pointed out that the air pollution, noise, and dust impacts from construction of the project, and from operation of a greatly expanded highway would be much more intense and serious in areas closer to the highway – the area of actual construction and traffic than in areas farther from these activities. The SEA pays no attention to this and repeatedly simply compares the number of affected EJ and non-EJ blocks in assessing	An <i>Environmental Justice Analysis Report</i> was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (EJ) populations. The EJ analysis was conducted in accordance with the United States Department of Transportation Order 5610.2C and FHWA Order 6640.23A, which define disproportionately high and adverse effects. The EJ analysis also followed FHWA's <i>Guidance on Environmental Justice and NEPA</i> (December 16, 2011). The study area for the EJ analysis was established in consideration of the project's traffic influence area, natural and human-made geographic boundaries, and general demographic composition. The EJ study area encompasses and is larger than the project study area for the supplemental EA. Expanding the EJ study area beyond the project study area provides the most conservative approach to the EJ analysis by capturing the fullest range of potential effects. In accordance with FHWA's <i>Guidance on Environmental Justice and NEPA</i> (December 16, 2011), consideration must be given to avoidance, minimization, and mitigation when evaluating whether an adverse effect to an EJ population will occur. A determination regarding disproportionately high and adverse after mitigation and benefits are considered. The EJ analysis concluded that Refined Alternative I (Concept I-W) is not anticipated to result in an adverse effect on air quality in EJ communities, and a determination of disproportionately high and adverse effects for air quality is not warranted.	Environmenta Justice (4.1.7

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			 whether impacts on EJ communities are disproportionate. The SEA erroneously discounts the project's harms to nearby minority residents: The Supplemental Environmental Assessment attempts to discount environmental justice concerns regarding disproportionate adverse impacts on minority communities by claiming any harms to minority populations will not be predominately borne by minority populations and are not appreciably more severe or greater in magnitude than those experienced by nonminority populations. This completely ignores the fact that the States and the Region are highly segregated, and the fact that the residents in these minority neighborhoods are already disproportionately harmed by existing pollution. 	KYTC and ODOT evaluated noise for Refined Alternative I (Concept I-W). In accordance with their respective state noise policies, noise sensitive receptors within 500 feet of the project corridor were analyzed for noise impacts. The EJ analysis concluded that noise impacts resulting from Refined Alternative I (Concept I-W) will not be predominately borne by EJ populations. In addition, proposed noise barriers will mitigate noise impacts and proposed noise/visual screening barriers will provide enhanced sound reduction in both EJ and non-EJ communities. Given the above, adverse noise effects on EJ populations are not anticipated to be appreciably more severe or greater in magnitude than the adverse noise effects that will be suffered by the non-EJ population. Therefore, noise impacts will not result in a disproportionately high and adverse effect on EJ populations. The EJ analysis concluded that temporary access and mobility, noise, and air quality (dust) impacts during construction would result in adverse effects on both EJ and non-EJ communities. Impacts are anticipated to be the most disruptive in the 24 census block groups that are directly adjacent to the project corridor, 12 (50 percent) of which contain minority and/or low-income populations. However, these impacts will be minimized to the greatest extent practicable through proactive communication with local cities and the public and the development of a traffic management plan, a dust control plan, and other measures to minimize and prevent discharge of dust, measures to minimize and prevent dis	



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				disproportionately high and adverse effect on EJ populations.	
		B-194-7	03/08/2024 - Census Data Documents the Racial Segregation: The neighborhoods along the expansion corridor in Covington and Cincinnati are more dominated by Black and Hispanic minorities than most other parts of those Cities, and much more dominated by those minorities than the population of either state.	The EJ analysis for the supplemental EA was conducted in accordance with all applicable federal and state guidelines. Where differences in methodology occur, the most conservative and inclusive approach was followed. The <u>Environmental Justice Analysis Report</u> provides a detailed description of the methodology employed in the analysis of the effects of Refined Alternative I (Concept I-W) on EJ populations.	Environmental Justice (4.1.7)
			The US Census Population total for 2020 are that the State of Kentucky had 4,505,836 residents, 82.4% non-Hispanic white, 9.7% Black, 1.7% Asian, and 4.6% Hispanic. Of the state's 437,066 Black residents, 23,407 or 5.3% of them lived in the 3-county N Kentucky region, where they make up 5.8% of the region's 398,108 population. 11,254 Black residents, 48% of those in the 3-county region, were concentrated in Kenton County, where they made up 6.7% of the County's 169,064 population. 4,668 of those living in Kenton County, were further concentrated in the City of Covington, where they made up 11.4% of the City's 40,950 population. In Census tracts 607, 650, 651 which straddle the eastern side of the Brent Spence Bridge Corridor Expansion area in Covington, Black residents reside in a greater proportion 14.1%, 13.1%, and 33.1% than their share of the city's population and in a much greater proportion than their share of the state's population. Of the state's 207,268 Hispanic residents, 17,757 or 8.6% of them lived in the 3-county N Kentucky region, where they make up 4.7% of the region's 398,108 population. 7,741 Hispanic residents, 43.5% of those in the 3-county region, were concentrated in Kenton County, where they	The demographic makeup of the EJ study area was identified using census data from the 5-year American Community Survey estimates for 2016-2020. Demographics were analyzed at the block group level, as defined by the U.S. Census Bureau 2020 decennial census geographic boundaries. In accordance with Executive Order 12898 and the <i>Promising Practices for EJ Methodologies in NEPA</i> <i>Reviews: Report of the Federal Interagency Working</i> <i>Group on Environmental Justice & NEPA Committee</i> (Promising Practices Report) (March 2016), minority and low-income populations within the EJ study area were identified using a meaningfully greater analysis, which identifies areas where the minority or low-income population percentage is meaningfully greater than the minority or low-income populations within an established reference community. For this project, the EJ study area was chosen as the reference community, and any percentage higher than the reference community was deemed to be meaningfully greater. Orders issued by USDOT and FHWA define low-income as a person whose median household income is at or below the Department of Health and Human Services guidelines. The EJ analysis for the supplemental EA designates low-income as 1.99 times the poverty thresholds established by the U.S. Census Bureau. This represents a more inclusive definition for low-income that	

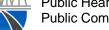
ID	Name	No.	Comment	Response	Reference ¹
			made up 4.6% of the County's 169,064 population. 3,481 of those living in Kenton County, were further concentrated in the City of Covington, where they made up 8.5% of the City's 40,950 population. In Census tracts 616, 650, 607 which straddle the western and eastern side of the Brent Spence Bridge Corridor Expansion area in Covington, Hispanic residents reside in a greater proportion 17.5%, 12.6%, and 9.6% than their share of the city's population and in a much greater proportion than their share of the state's population. The US Census Population total for 2020 are that the state of Ohio had 11,799,448 residents, 80.9% non-Hispanic white, 13.3% Black, 2.7% Asian, and 4.5% Hispanic. Of the state's 1,569,326 Black residents, 286,813 or 18.3% of them lived in the 4-county SW Ohio region, where they make up 17.2% of the region's 1,671,934 population. 227,978 Black residents, 79.5% of those in the 4-county region, were concentrated in Hamilton County, where they made up 27.5% of the County's 830,639 population. 122,567 of those living in Hamilton County, were further concentrated in the City of Cincinnati, where they made up 39.6% of the City's 309,317 population. In Census tracts 263, 269, 2, and 264 which straddle the eastern and western side of the Brent Spence Bridge Corridor Expansion area in Cincinnati, Black residents reside in a greater proportion 47.8%, 76.7%, 86.0% and 76.2% than their share of the city's population and in a much greater proportion than their share of the state's population. Of the state's 530,957 Hispanic residents, 74,209 or 14.0% of them lived in the 4-county SW Ohio region, where they make up 4.4% of the region's 1,671,934 population. 36,250 Hispanic residents, 48.8% of those in the 4-county	exceeds the minimum federal poverty guidelines and represents a strong commitment by KYTC and ODOT to going above and beyond in addressing EJ on the BSB Corridor Project. Minority populations are concentrated in the southeastern portion of the EJ study area in Kentucky and throughout the EJ study area in Ohio. Low-income populations are broadly dispersed throughout the EJ study area and are located directly adjacent to the project corridor. Mapping showing the locations of census block groups with minority and low-income populations in the EJ study area is included in the supplemental EA.	



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			region, were concentrated in Hamilton County, where they made up 4.4% of the County's 830,639 population. 14,228 of those living in Hamilton County, were further concentrated in the City of Cincinnati, where they made up 4.6% of the City's 309,317 population. In Census tracts 263, 92, and 93 which straddle and are adjacent to the western side of the Brent Spence Bridge Corridor Expansion area in Cincinnati, Hispanic residents reside in a greater proportion 6.1%, 31.4%, and 15.6% than their share of the city's population and in a much greater proportion than their share of the state's population.		
		B-194-8	 03/08/2024 - The EPA's EJA Screening Tool Documents Already Existing Harms: The U.S. Environmental Protection Agency Environmental Justice Screening Tool (available at https://ejscreen.epa.gov/mapper) ranks census blocks and tracts by percentile, compared to either the nation, or the state in which they are located, with EJ Indexes for exposure to air pollutants (PM 2.5, ozone, diesel particulate material, air toxics cancer risk, air toxics respiratory health) and by Socioeconomic Indexes for people of color, low income, and Health Disparities (Asthma). The census areas adjacent to or almost adjacent to the project corridor with higher proportions of minority residents repeatedly are identified by the EPA as in the 99-100 percentile, or the 90- 95 percentile rankings of these indexes. Thus, the EPA EJ Map People of Color vs. State confirms that the DOTs' EJ Census blocks correspond to relatively high concentrations of minority residents (ranging from the 70th percentile to the 100th percentile in their respective states. See below. 	 In accordance with FHWA's <i>Guidance on Environmental Justice and NEPA</i> (December 16, 2011), consideration must be given to avoidance, minimization, and mitigation when evaluating whether an adverse effect to an EJ population will occur. A determination regarding disproportionately high and adverse effects with respect to minority and/or low-income populations is only required if the effects remain adverse after mitigation and benefits are considered. The EJ analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on EJ populations: No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; No adverse indirect and cumulative effects; No disproportionately high and adverse relocation, noise, or temporary construction effects; and Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle 	Environmental Justice (4.1.7) Socioeconomic Groups (4.1.8)

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			 [Comment included a map with the title: People of Color VS State.] The EPA EJ Map Low Income vs. State presents a fairly similar pattern, but with higher percentiles prevalent near the highway in Ohio (compared to the "People of Color" map), and slightly lower percentiles prevalent along the highway in Kentucky (compared to "People of Color"). See below. [Comment included a map with the title: Low Income VS State.] The EPA EJ map Percentage of Households with No Vehicle Access unsurprisingly presents a largely similar pattern. Thus, 40-54% of the households in Ohio in substantial areas west and east of the highway north of the Ohio River; in Kentucky, west of the highway there are considerably lower %s of households with no access to vehicles, but east of the highway, there are a series of blocks, some immediately adjacent to the highway and others within ½ to 1 ½ miles from the highway with between 32.7% and 40.8% having no access to vehicles. Those areas correspond to the DOTs' EJ Census blocks. See below. [Comment included a map with the title: Percentage of Households with No Vehicle Access.] The EPA EJ Map Health Disparities: Asthma vs. Nation identifies the Areas west and east of the highway in Ohio (excluding the downtown area must north of the Ohio River) as being within the 95-100 percentile compared to the nation's population with respect to prevalence of asthma. In Kentucky, immediately west of the highway and immediately east of the highway and immediately east of the highway in Ohio (excluding the downtown area must north of the Ohio River) as being within the 95-100 percentile compared to the nation's population with respect to prevalence of asthma. In Kentucky, immediately west of the highway and immediately east of the highway and immediately west of the highway and immediately west of the highway and immediately	combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood. A <u>Socioeconomic Technical Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on several populations and groups, including zero-car households. The analysis concluded that Refined Alternative I (Concept I-W) would have no impacts to pedestrian, bicycle, and transit access and mobility.	





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			highway and near to the Ohio River, the prevalence of asthma ranges in the 80-100 percentile, and between the 95-100 percentile further south along the highway and through the series of EJ census blocks as one moves west and north from there. See below.		
			[Comment included a map with the title: Health Disparities: Asthma VS Nation.]		
			The EPA EJ Map Air Toxics Respiratory vs. State, is largely similar to the Asthma Map, with the same general pattern of the areas identified in the SEA as Ohio EJ Census Blocks overwhelmingly being in the 95-100 percentile range, and the Kentucky EJ Census Blocks falling in the 80-100 percentile ranges. See Below.		
			[Comment included a map with the title: Air Toxics Resp VS State.]		
			The EPA EJ Maps Air Toxics Respiratory vs. State and Air Toxics Cancer Risk vs. State show similar patterns of SEA EJ Census blocks being in the highest or near highest percentiles in their respective states. See two maps below.		
			[Comment included a duplicate map with the title: Air Toxics Resp VS State.]		
			[Comment included a map with the title: Air Toxics Cancer Risk VS State.]		
			The EPA EJ Maps regarding air quality provide insight into at least some of the factors resulting in the health disparities evidenced above. While the EPA Maps regarding PM2.5 vs. State, Diesel PM vs. State, and Ozone vs. State each differ in some respects, they all show the pattern of patterns in which the 95- 100 percentile, 90-95 percentile, and 80-90 percentile areas largely correspond with the		



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			SEA's EJ Census Blocks. See three maps below.		
			[Comment included a map with the title: Diesel PM VS State.]		
			[Comment included a map with the title: Ozone VS State.]		
			[Comment included a map with the title: PM2.5 VS State.]		
			The SEA completely fails to address the fact that disproportionate impacts exist if the magnitude of the adverse effect is appreciably greater on persons of color than on white persons. As already noted above, very many of the EJ areas are located immediately adjacent to or otherwise close to the highway Construction zone itself. They will be harmed and burdened much more by the noise, air pollution, dust, and disruption resulting from the many years during which the project would be constructed, than will the residents of the disproportionately majority areas farther from the highway itself, where those impacts are dissipated or even eliminated as a result of distance. The SEA acknowledges that the 1-W Alternative will result in increased traffic volumes, compared to non- build. That will result in more noise, air pollution, and dust than if the project is not constructed – and these harms will more significantly impact the residents of the nearby EJ areas during the long lifetime of an expanded highway.		
		B-194-9	03/08/2024 - In addition, the EPA environmental justice screens themselves – which the transportation agencies apparently did not even bother to collect, much less to consider in the SEA – show far greater already existing burdens related to pollution and	The <u>Environmental Justice Analysis Report</u> presents data from the USEPA environmental justice mapping and screening tool (EJ Screen) for PM2.5, diesel particulate matter in the air, and the air toxics respiratory hazard index. Environmental indicators synthesized by USEPA	Environmental Justice (4.1.7)



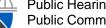
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			adverse health effects in Black and Latinx neighborhoods. Even assuming (incorrectly) for the purpose of argument that a similar percentage of white residents might have the same pollution exposure, the adverse effects are almost certainly disproportionately greater on persons of color. The higher poverty rates and fewer assets generally available to Black and Latinx residents, will also increase the magnitude of the harms to them. Consider insufficient income or wealth to afford air conditioners, air filters, or adequate medical care and treatment. Where, as here, a discriminatory effect exists, Title VI requires agencies to "ensure that mitigation measures are taken and documented to eliminate or minimize the disparate impact. Where a disparate impact cannot be eliminated, [agencies] shall ensure that the activity will only be undertaken if a substantial legitimate justification for the action exists and is documented and that the activity is the least discriminatory alternative. (U.S. Dept of Transportation Order 1000.12C, U.S.DOT Title VI Program (June 11, 2021) at Ch. I, Sec. 7).	show that pollutant levels are relatively high when compared to statewide data for Kentucky and Ohio. To further evaluate air quality considerations for EJ populations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no-build, and 2050 build scenarios. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the EJ study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the EJ study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Twenty (20) percent of the census block groups with minority and/or low-income populations in the EJ study area are in Kenton County; therefore, the slightly greater level of PM2.5 when the 2050 build scenario is compared to the 2050 no-build scenario will not be predominately borne by EJ populations nor is it appreciably more severe or greater in magnitude than the level of PM2.5 emissions for the non-EJ population. Given the above, Refined Alternative I (Concept I-W) is not anticipated to result in an adverse effect on air quality in EJ communities, and a determination of disproportionately high and adverse effect for air quality is not warranted. The EJ analysis concluded that the temporary and permanent adverse effects to EJ populations will be minor, will not be predominately borne by EJ populations, and are not appreciably more severe or greater in magnitude than those experienced by non-EJ populations. In addition, EJ communities have been, and will continue to be, provided full and fair participation in the transportation decision-making process. Therefore, Refined Alternative I (Concept I-W) will not cause disproportionately high and adverse effects on any minority or low-income populations in accordance with the provisions of Executive Order 12898 and FHWA Order 6	

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				mitigation, and enhancement measures have been incorporated into Refined Alternative I (Concept I-W) to reduce adverse effects and provide additional benefits.	
		B-194-10	 03/08/2024 - Failure to include a reasonable alternative which included investments in and expansion of public transit as a means of reducing the amount of highway expansion: Federal law states that "all agencies of the Federal Government shall — study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." 42 U.S.C. § 4332 (E). Under 23 C.F.R. § 771.105(c), it is the government's policy that "[a]Iternative courses of action be evaluated and decisions be made in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation; of the social, economic, and environmental impacts of the proposed transportation improvement; and of national, State, and local environmental protection goals." As public comments and the history of this project demonstrate, there are significant conflicts concerning reasonable alternative uses of available resources, significant social, economic and environmental impacts of the action, and a significant failure to follow environmental protection goals, including those related to climate change and environmental justice. Yet the agencies entirely failed to evaluate an alternative that does not expand capacity, that rebuilds and makes focused improvements to the existing roadway, and that increases transit, would meet the purpose and need of the project. Improving transit – and 	In March 2015, KYTC and ODOT prepared a <u>Cost</u> <u>Savings Study</u> that evaluated options for scaling back the project to primarily address the safety and design deficiencies of the existing BSB with minimal construction on I-71/I-75 to tie into the new/rehabilitated structures. However, these concepts were removed from further consideration because they did not address traffic operational issues throughout the corridor and created safety concerns due to lane drops on I-71/I-75. In 2004, the Ohio-Indiana-Kentucky Regional Council of Governments and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit routes would not meet the project purpose and need and are not considered to be a reasonable alternative for the BSB Corridor Project. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental EA. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access. Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that	Purpose and Need (2.) Travel Patterns and Access (4.1.4) Environmental Justice (4.1.7) Socioeconomic Groups (4.1.8)

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			thus considering a transit-inclusive alternative - is also required to ensure that communities of color receive a fair share of the benefits of transportation system investments.	use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
			 Refusing to consider a transit alternative can be – and here is - the result of an inappropriately biased process. "[O]verburdened mass transportation systems" are one of the issues that "affect the urban 'environment" Trinity Episcopal School Corp. v. Romney, 523 F.2d 88, 93 (2d Cir. 1975) (internal citations omitted). See also First National Bank of Chicago v. Richardson, 484 F.2d 1369, 1377-8 (7th Cir. 1973) (internal citations omitted): "Of necessity, NEPA must be construed to include protection of the quality of life for city residents, particularly in view of the profound influences of population growth, high-density urbanization, [and] industrial expansion [In the inner city] many of our most severe environmental problems interact with social and economic conditions which the Nation is also 	The <u>Environmental Justice Analysis Report</u> concluded that Refined Alternative I (Concept I-W) would not result in adverse effects on pedestrian, bicycle, or transit access and mobility for EJ populations. The <u>Socioeconomic</u> <u>Technical Report</u> concluded that Refined Alternative I (Concept I-W) would have no impacts to pedestrian, bicycle, and transit access and mobility for zero-car households.	
			seeking to improve" The failure to consider a transit inclusive alternative is also indefensible in light of long- standing FHWA policy:		
			"The following range of alternatives should be considered when determining reasonable alternatives: Mass Transit: This alternative includes those reasonable and feasible transit options (bus systems, rail, etc.) even though they may not be within the existing FHWA funding authority. It should be considered on all proposed major highway projects in urbanized areas over 200,000 population [T]he relationship of the project to other Federal actions which may serve or adversely affect the		



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			ethnic or minority population should be identified."		
			"Guidance for Preparing and Processing Environmental and Section 4(F) Documents," FHWA Technical Advisory T 6640.8A (Oct. 30, 1987) ("Advisory T 6640.8A") at Sec. V.E.3 (emphasis added). The requirement to consider transit to meet some or all the project need is true even if mass transit in the area is not a "sure thing." Davis v. Mineta, 302 F.3d 1104, 1121-2 (10 th Cir. 2002). See also, Utahns for Better Transp. v. U.S. Dept. of Transp., 305 F.3d 1152, 1170-71 (10 th Cir. 2002) (agency should have considered reasonable alternatives including implementing transit improvements before highway improvements, and integrating highway and transit improvements). To fully consider such alternatives requires a careful evaluation of costs and benefits, and consideration of whether resources targeted for a road project might instead "be effectively directed toward expansion of mass transit and other traffic management strategies" in ways that avoid adverse impacts. Davis, 302 F.3d at 1122. Moreover, the state agencies could recommend that some federal Surface Transportation Program dollars which might be used for highway construction instead be used, as allowed by federal law, to support transit capital improvements, see, e.g., 23 U.S.C. § 133(b)(1)(c).		
			Further, as a federal court made clear to USDOT in 2009, in the highway context agencies must evaluate less harmful alternatives to address transportation capacity needs.		
			"[D]efendants cannot use the need for additional capacity on Highway 164 as a		

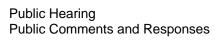


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			reason for refusing to study alternative means of providing that capacity. The very point of the reasonable alternatives exercise is to determine whether less destructive alternatives might achieve the purpose of the project. Here, defendants seem to have simply assumed that Highway 164 must be expanded to four lanes because local transportation plans document the need for additional capacity. Again, however, defendants must examine whether it is possible to provide this capacity through an alternative that is less environmentally destructive than expanding the highway to four lanes." Highway J Citizens Group v. USDOT, 656 F.Supp.2d 868, 892 (E.D. Wis. 2009), citing Simmons v. Army Corps, 120 F.3d 664, 668-70 (7 th Cir. 1997).		
			Title VI and environmental justice require the agencies to consider alternatives that will have fewer disproportionate adverse effects on communities of color, and doing so also comports with the agencies' own policies, including policies focused on urban residents. Moreover, improving transit – and thus considering a highway and transit expansion alternative - is also required to ensure that communities of color receive a fair share of the benefits of transportation system investments. In the absence of transit expansion, the minority residents in the primary study area who disproportionately do not own private vehicles or have drivers licenses will bear more of the burdens of construction, pollution, etc. while receiving proportionately fewer benefits.		
			A federal court long ago made clear that agencies "must consider such alternatives to the proposed action as may partially or completely meet the proposal's goal and it must evaluate their comparative merits."		

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			Natural Resources Defense Council, Inc. v. Callaway, 524 F.2d 79 (2d Cir. 1975) (emphasis added). In another case, a court rejected an EIS for a proposed highway reconstruction and widening project due to its failure to afford adequate consideration to an alternative that would partially meet the stated purpose and need. The DOT justified its failure to consider the suggested bypass alternative on the ground that the project had two goals, repairing and upgrading the road, and the bypass would only accomplish the second purpose. The court found the EIS' discussion of alternatives inadequate, concluding that NEPA does not permit the agency to eliminate from discussion or consideration a whole range of alternatives merely because they would achieve only some of the purposes of a multi- purpose project. Town of Matthews v. U.S. Dept. of Transp., 527 F. Supp 1055, 1057 (W.D.N.C. 1981). See also Natural Resources Defense Council, Inc. v. Morton, 458 F.2d 827 (D.C. Cir. 1972)(stating that "(it is not) appropriate to disregard alternatives merely because they do not offer a complete solution to the problem.)		
		B-194-11	03/08/2024 - These principles are all the more applicable here, since the SEA clearly reveals that the proposed alternatives it has considered fail to offer a complete solution to the stated problem, and to the stated purpose and need. For example, while addressing design and safety shortcomings of the current highway, the selected alternative, Refined Alternative 1, includes 55 "design exceptions" from the agencies' standards. (SEA p. 28). Moreover, induced traffic caused by the dramatic increase in travel lanes, which the	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Required design exceptions will be finalized during the detailed design of each construction phase. FHWA, KYTC, and ODOT will further evaluate potential design exceptions based on the context of the facility, needs of the various project users, safety, mobility, human and environmental impacts, project costs, and other impacts prior to approval.	Purpose and Need (2.) Design Exceptions (3.5) Traffic (3.8)



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			agencies have not properly considered or addressed, will inevitably result in a return to congested conditions after a few years, so the project's congestion elimination goal will not actually be achieved.	The Interchange Modification Study Addendum documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's Interactive Highway Safety Design Model. The analysis compared the safety of Refined Alternative I (Concept I-W) to the no- build condition. The analysis concluded that Refined Alternative I (Concept I-W) will reduce crashes on the existing BSB, the I-71/I-75 mainline in Kentucky, the I-75 mainline in Ohio, and locations of notable changes incorporated into Refined Alternative I (Concept I-W). The Interchange Modification Study Addendum concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-194-12	03/08/2024 - The SEA inadequately addresses air pollution impacts of the project. There is an extensive body of research documenting the negative effects of air pollution - particularly traffic-related air pollutants - and the disproportionate burden of air pollution on communities of color and low-income communities - including a higher COVID-19 mortality rate. "Traffic Related Air Pollution and the Burden of Childhood Asthma in the Contiguous United States in 2000 and 2010" (data sets available at https://carteehdata.org/library/webapp/trap- asthma-usa) Achakalwisut et al., "Global, national, and urban burdens of pediatric asthma incidence attributable to ambient NO ₂ pollution: estimates from global datasets," Lancet Planet Health (2019 "Finding pollution- and who it impacts most- in Houston," Environmental Defense Fund (June 3, 2020); Bell ML et al. "Challenges and recommendations for the study of	Traffic projections for the BSB Corridor Project were updated during the preparation of the supplemental EA. The comment appears to potentially reference traffic projections from prior studies. Air quality evaluations of Refined Alternative I (Concept I-W) considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. All areas in both states are currently in attainment for carbon monoxide. As such, carbon monoxide conformity requirements do not apply to transportation projects in Kentucky or Ohio, and no additional analysis related to carbon monoxide is required for Refined Alternative I (Concept I-W). In November 2022, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) completed a regional emissions and air quality conformity analysis demonstrating that the 2021-2024 Transportation Improvement Program and 2050 Metropolitan Transportation Plan conform to all applicable USEPA approved State Implementation Plans for air quality. The	Air Quality (4.6)



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			 socioeconomic factors and air pollution health effects," Environmental Science and Policy 2005 8:525–33; O'Neill MS et al. "Health, wealth, and air pollution: advancing theory and methods," Environmental Health Perspectives 2003;111:1861–70; Brender JD et al., "Residential proximity to environmental hazards and adverse health outcomes." Am. J. Public Health 2011;101:S37–52; Chakraborty J. "Automobiles, air toxics, and adverse health risks: environmental inequities in Tampa Bay, Florida," Annals of the Assoc. of Amer. Geographers 2009, 99:674–97; Gunier RB, et al., "Traffic density in California: socioeconomic and ethnic differences among potentially exposed children," Journal of Exposure Analysis & Environ. Epidemiol. 2003;13:240–46; Tegan K. Boehmer, "Residential proximity to major highways - United States, 2010," CDC Division of Environmental Hazards and Health Effects (2013); Xiao Wu and Rachel C. Nethery, "Exposure to air pollution and COVID-19 mortality in the United States," Harvard T.H. Chan School of Public Health (April 2020). The SEA asserts that there will not be any significant adverse air pollution impacts of the project, based in part on the region's recent attainment or maintenance designations for particular pollutants. However, current levels of unhealthful air pollutants are the result of daily traffic volumes in this corridor that ranged between 2017 and 2021. The agencies predict daily volumes of 233,000 in 2035, about 50% higher than those recent years' actual counts. While they project gradual replacement of today's fleets of relatively highly polluting vehicles with vehicles that will emit fewer pollutants per mile year after year into the future, they are also projecting growth in traffic 	 BSB Corridor Project is included in OKI's air quality conforming 2021-2024 Transportation Improvement Program and 2050 Metropolitan Transportation Plan. Furthermore, the design concept and scope of Refined Alternative I (Concept I-W) have not changed substantially from what is described in the Transportation Improvement Program. Therefore, no additional transportation conformity analysis is required related to ozone for Refined Alternative I (Concept I-W). Based on the most current designations, the project area is not located in a PM2.5 nonattainment or maintenance area. As such, PM2.5 conformity requirements do not apply, and additional PM2.5 analysis is not required for Refined Alternative I (Concept I-W). KYTC and ODOT conducted a quantitative emissions analysis of nine mobile source air toxics (MSAT) compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios using USEPA's MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. The results are documented in a <i>Quantitative MSAT Analysis Report</i> (<i>August 2023</i>), which concluded that emissions for all analyzed MSAT pollutants are projected to be less when the 2050 no-build and 2050 build scenario is compared to the 2050 no-build scenario is compared to the 2050 no-build scenario is compared to the 2050 build scenario is compared to the 2050 no-build scenario is compared to the 2050 build acenario is compared to the 2050 build and 2050 build acenario is compared to the 2050 build scenario is compared to the 2050 no-build scenario is compared to the 2050 build scenario is compared to	

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			volumes over the coming decade that will inevitably dramatically increase the amount of air pollution from vehicles driving in this corridor.	modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios using MOVES and travel demand models for the project's approved certified traffic. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant. Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-194-13	03/08/2024 - Failure to reasonably assess induced travel demand: The SEA asserts that constructing 16 highway lanes crossing the	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for	Traffic (3.8)



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			 Ohio River in this corridor where only 8 currently exist, and constructing numerous additional lanes on both ends of the bridges – ending up with as many as 20 parallel lanes in the project corridor where only 10 currently exist will lead to traffic volumes in 2050 that will be only 1.7% higher than the no-build option. Clearly the agencies have closed their eyes to the long-understood existence of induced demand. That is, " If you build more highway capacity, they will come and use it." For a time, congestion will ease, and more and more people will decide to get in their cars and use that added capacity. The first order result is causing people to take longer or entirely new vehicle trips that would not have taken place if additional highway infrastructure had not been constructed and made available "for free" to motorists. If not for the added highway infrastructure, they would have walked, biked, taken transit, or simply not taken those particular trips at all. The nature of this "generated traffic" has been explained as follows: "Traffic engineers often compare traffic to a fluid, assuming that a certain volume must flow through the road system, but it is more appropriate to compare urban traffic to a gas that expands to fill available space (Jacobsen 1997). Traffic volumes increase to the point that congestion tends to maintain equilibrium: traffic volumes increase to the point that congestion delays discourage additional peak-period vehicle trips. Expanding congested roads attracts latent demand, trips from other routes, times and modes, and encourage longer and more frequent travel. This is called generated traffic, referring to additional peak-period vehicle traffic on a particular road. This consists in part of induced travel, which refers to absolute increases in 	the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <i>Interchange Modification Study Addendum</i> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	

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			vehicle miles travel (VMT) compared with what would otherwise occur (Hills 1996).		
			Generated traffic reflects the economic "law of demand," which states that consumption of a good increases as its price declines. Roadway improvements that reduce the user costs of driving (i.e., the price) encourage more vehicle use. In the short-run generated traffic represents a shift along the demand curve; reduced congestion reduces travel time and vehicle operating costs. Over the long run induced travel represents an outward shift in the demand curve as transport systems and land use patterns become more automobile dependent, so people must drive more to maintain a given level of accessibility to goods, services and activities (Lee 1999).		
			Litman, "Generated Traffic and Induced Travel: Implications for Transport Planning,"Victoria Transport Policy Institute (July 18, 2017) at p. 2		
			Litman's article also summarizes numerous studies of the effects of this latent demand in cities around the world, including short-term reductions in congestion, followed by increases in the number and length of vehicle trips, particularly during peak periods, that reduces or eliminates the initial congestion improvements over time are summarized at pages 6-11.		
			This has certainly been the experience of many U.S. cities in recent decades. "In 2015, \$1 billion project to widen a 10-mile stretch of Interstate 405 through Los Angeles was completed. For a period, 'congestion was relieved,' said Tony Tavares, the director of Caltrans, California's Department of Transportation. But that relief did not last. Rush hour traffic soon rebounded, he said." Eden		



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			Weingart, "Widening Highways Doesn't Fix Traffic," New York Times (Jan. 6, 2023). See also Katie Wilson, "How Fighting Congestion Can Create Congestion," Crosscut, (Oct. 20, 2021);and "The Congestion Con," T4America (2020).		
			"'It's a pretty basic economic principle that if you reduce the price of a good then people will consume more of it,' Susan Handy, a professor of environmental science and policy at the University of California, Davis, said. 'That's essentially what we're doing when we expand freeways.'		
			The concept of induced traffic has been around since the 1960s, but in a 2009 study, researchers confirmed what transportation experts had observed for years: In a metropolitan area, when road capacity increases by 1 percent, the number of cars on the road after a few years also increases by 1 percent. (Weingart, at p. 5)."		
			In Houston, after the Katy Freeway in Houston was expanded in 2008, "the project was hailed as a success. But within five years, peak hour travel times on the freeway were longer than before the expansion. Matt Turner, an economics professor at Brown University and co-author of the 2009 study on congestion, said adding lanes is a fine solution if the goal is to get more cars on the road. But most highway expansion projects, including those in progress in Texas, cite reducing traffic as a primary goal. "If you keep adding lanes because you want to reduce traffic congestion, you have to be really determined not to learn from history," Dr. Turner said. (Weingart at p. 9).		
			Efforts to quantify the effects of induced demand have been undertaken by the Institute		



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			 of Transportation Studies at the University of California, Davis (ITS-Davis) through its National Center for Sustainable Transportation (NCST). NCST has developed an Induced Travel Calculator (Calculator) as a method for estimating the additional vehicle miles traveled (VMT) induced by expanding the capacity of major roadways. While ITS-Davis initiated the project to support Caltrans, the application can now be used to estimate induced demand for other regions of the country. (https://travelcalculator.ncst.ucdavis.edu/about.html) The tool enables users to estimate the VMT induced annually as a result of expanding capacity of interstate highways, other freeways and expressways and other principal arterials. While the tool is limited to certain facility types and conditions, it has the ability to estimate induced VMT for highway capacity expansion, such as that proposed by adding additional through lanes to the I-75/I-71 corridor. The Calculator produces a statistical range (95% confidence level, +/-20%) of induced VMT. Data sources and specifications for the equation include Lane Miles Added, Facility Type, State, and Metropolitan Statistical Area (MSA). (Calculator at: https://shift.rmi.org) For this project, the following data was entered into the Calculator to estimate "Induced Demand". Results are also provided below. Lane Miles Added: approximately 26 miles of added interstate highway Facility Type: Interstate Highway State, MSA: Ohio, Cincinnati Lane Miles Added: approximately 4 miles of added principal arterials Facility Type: principal arterials Facility Type: principal arterials 		



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			Results of these inputs show the added through lanes would result in about 136 million additional vehicle miles travelled per year (the midpoint of the calculator's estimated range of 109-164 million). The agencies need to fully consider all of the impacts of these additional vehicle miles that would occur simply because of the great increase in traffic infrastructure that the project would provide.		
		B-194-14	03/08/2024 - EPA has issued more stringent air quality standards for particulate pollution, in order to protect public health: On February 7, 2024, the EPA "strengthened the National Ambient Air Quality Standards for Particulate Matter (PM NAAQS) to protect millions of Americans from harmful and costly health impacts, such as heart attacks and premature death. Particle or soot pollution is one of the most dangerous forms of air pollution, and an extensive body of science links it to a range of serious and sometimes deadly illnesses. EPA is setting the level of the primary (health-based) annual PM2.5 standard at 9.0 micrograms per cubic meter to provide increased public health protection, consistent with the available health science." See https://www.epa.gov/pm- pollution/final-reconsideration- national- ambient-air-quality-standards-particulate- matter-pm While the region may now be in attainment status for PM2.5, after years of being designated as nonattainment or maintenance, the SEA did not acknowledge that EPA had long proposed the tighter 9.0 ug/m3standard. This is important for several reasons. First, the SEA acknowledges that the project will cause PM2.5 pollution to increase by 3% compared to the No Build option. Second, the failure of the SEA to adequately address the large increase in vehicle miles	Based on the most current designations, the project area is not located in a PM2.5 nonattainment or maintenance area. As such, PM2.5 conformity requirements do not apply, and additional PM2.5 analysis is not required for Refined Alternative I (Concept I-W). Although additional PM2.5 analysis is not required, the levels of PM2.5 were modeled as part of an emissions burdens analysis that KYTC and ODOT prepared to further evaluate air quality considerations for Refined Alternative I (Concept I-W). The emissions burdens analysis modeled the levels of PM2.5 and other pollutants in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios using the travel demand models for the project's approved certified traffic. When the 2050 build scenario is compared to the 2050 no-build scenario, PM2.5 is anticipated to be less or approximately the same in Campbell and Hamilton counties. In Kenton County, PM2.5 is anticipated to be slightly greater (2.8 percent) due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). However, the 2.8 percent difference in PM2.5 emissions is less than the associated 3.4 percent difference in vehicle miles of travel in Kenton County. In addition, PM2.5 in Kenton County is anticipated to decrease by 85.1 and 84.6 percent when the 2050 no- build and build scenarios are compared to the 2020 existing scenario, respectively. Since the future scenarios are anticipated to have a substantial decrease in	Particulate Matter (4.6.3) Emissions Burdens Analysis (4.6.5) Construction Impacts (4.11)

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			traveled as a result of induced travel demand means that its estimates of the impact of the project on air pollution, including PM2.5 are too low. Third, the reported annual PM2.5 concentration for Cincinnati for 2021 was 10.0 ug/m3, which is 11% more than the level which the EPA has determined is necessary to protect human health. Fourth, air monitoring results for PM2.5 are available at IQAir, and as of 3 pm on February 19, 2024, the concentration of PM2.5 was 11 ug/m3.This is 22% above the standard that EPA has established to protect public health. The agencies' projection that traffic volumes on the corridor will increase by about 50% over roughly the next decade also needs to be factored in here. An accurate assessment of the project's impact on air pollution, including proper consideration of induced travel demand, and the dramatically increased future traffic volumes predicted by the agencies is essential to determine the actual impacts of the project. This has not been done.	emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant. During construction, KYTC and ODOT will develop and implement an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals. As described in Section 4.11.7 of the supplemental EA, the program will monitor levels of PM2.5, nitrogen dioxide, and carbon monoxide during construction activities. If the data show that air quality levels are approaching a concern level that may result in an exceedance of the 24-hour National Ambient Air Quality Standard (NAAQS) for PM2.5, the 1-hour NAAQS for nitrogen dioxide, or the 8-hour NAAQS for carbon monoxide, then project-related operational and/or mechanical deficiencies will be identified and corrected, as required, if they are determined to be contributing factors. If the data result in any air quality levels that exceed the above-stated NAAQS for PM2.5, nitrogen dioxide, or carbon monoxide that are caused by project-related emissions, then the applicable construction activities will be suspended until the deficiencies are identified and corrected. Additional details related to the ambient air quality monitoring program will be determined during detailed design, including locations, times, and durations of air quality monitoring; protocols to address any exceedances of the NAAQS should they be observed; and how monitoring and enforcement data will be made available to the public.	
		B-194-15	03/08/2024 - Noise, dust and mobility impacts will not be mitigated to insignificant levels: Continual exposure to traffic noise can cause health effects, including increasing the risk of depression., Orban E, et al., "Residential road traffic noise and high depressive symptoms after five years of follow-up: results from the	KYTC and ODOT evaluated noise for Refined Alternative I (Concept I-W) in accordance with their current noise manuals and policies and the certified traffic projections prepared for the project. The A-weighted decibel (dBA) is accepted by FHWA, KYTC, and ODOT as the preferred sound weighting method for assessing human exposure from traffic noise. Where noise impacts were identified,	Noise (4.8)



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			Heinz Nixdorf Recall Study," Environ. Health Perspect. 124:578-585; It is therefore critical that noise and health risks, and any racial or environmental disproportion of them, be assessed. The SEA admits at pages 192-193 that there are numerous areas along the project corridor that will be affected by noise levels higher than the agencies' established standards. Furthermore, while the SEA indicates that noise barriers were considered for several of those impacted sections of the corridor, there were areas that will be significantly impacted by increased noise for which effective noise barriers could be designed and installed, but the agencies do not plan to instruct them because of the cost. That includes, for one example, the Cincinnati Job Corps Training center west of the highway. (SEA p. 194). That alone contradicts the finding of no significant adverse impact. Noise impacts are also likely to be more significant than the SEA predicts because of the agencies' projection of considerable growth in traffic volumes and SEA's inadequate consideration of induced travel demand.	noise barriers were evaluated to determine if they were feasible. Under KYTC's noise policy, a noise barrier is feasible if it provides a minimum 5 dBA reduction for at least three of the impacted receptors. Under ODOT's noise policy, a noise barrier is feasible if it provides a minimum 5 dBA reduction for at least 40 percent of the impacted receptors. In addition, the noise barrier must not pose any overriding engineering, constructability, safety, or maintenance issues to be considered feasible. If a barrier was found to be feasible per the applicable noise policy, KYTC and ODOT then evaluated whether the noise barrier was reasonable. A noise barrier is reasonable under each state's policy if it meets specific noise reduction design goals, is cost effective, and comports with appropriate public engagement. Under KYTC's noise policy, a noise barrier is considered reasonable if it achieves a noise reduction design goal of 7 dBA for a minimum of 50 percent of the front row benefited receptors and has a cost per benefited receptor of \$40,000 or less. Under ODOT's noise policy, a noise barrier is reasonable if it achieves a noise reduction design goal of 7 dBA for at least one benefited receptor and has a cost per benefitted receptor of \$56,000 or less. For the cost reasonability calculation, areas other than single-family residences were converted into an equivalent number of receptors based on the receiver's use. A noise barrier must be found to be both feasible and reasonable in accordance with 23 CFR part 772 and the applicable state noise policy to be recommended for construction. If a noise barrier is found to be feasible and meets the noise reduction design goals and cost-effective reasonableness criteria, KYTC and ODOT will then coordinate with the property owners and tenants who would benefit from the barrier before making the final decision about whether it will be built. As a result of the noise studies, KYTC is proposing seven noise barriers to mitigate noise impacts in Kentucky, and ODOT is proposing	



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				outreach efforts that traffic noise is a primary concern of area residents, KYTC conducted technical studies to evaluate additional noise/visual screening barriers where noise impacts were predicted but noise barriers were not warranted. Based on the technical feasibility and public comments received during outreach activities, KYTC is proposing two additional noise/visual screening barriers in Kentucky. Noise/visual screening barriers do not meet one or more of the reasonability criteria but are proposed enhancements to provide noise reduction above and beyond the requirements of 23 CFR part 772 and the applicable state noise policy.	
				The Ohio analysis evaluated noise levels at several covered pavilions and patio areas with tables at the Cincinnati Job Corps, a location that is referenced by the commenter. Noise barriers were evaluated for the Cincinnati Job Corps and were found to meet the minimum feasible criterion. However, the noise barrier was estimated to cost \$242,640 per benefited receptor, which far exceeds the cost reasonable criterion of \$56,000 per benefitted receptor. Therefore, noise mitigation is not proposed for the Cincinnati Job Corps.	
				The noise studies prepared for Refined Alternative I (Concept I-W) predicted noise impacts at over 2,000 noise sensitive receptors in the project area. Noise barriers or noise/visual screening barriers are not proposed for only 116 of the over 2,000 impacted noise sensitive receptors. Therefore, the large majority of the noise impacts in the project area will be mitigated by proposed noise barriers or receive enhanced sound reduction from proposed noise/visual screening barriers.	
				In accordance with the KYTC <i>Noise Analysis and</i> <i>Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from proposed noise barriers and noise/visual screening barriers during the detailed design phase of the BSB Corridor Project. In accordance with the ODOT <i>Analysis and Abatement of Highway Traffic Noise</i>	



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			<i>Policy Statement</i> , ODOT will conduct noise abatement public involvement with property owners and tenants who would benefit from proposed noise barriers in Ohio during the detailed design phases of the project.	
	B-194-	 03/08/2024 - Moreover, the SEA suggests that various mitigation measures will be put in place to reduce the impact of noise, dust, other air pollutants, access and congestion problems and other impacts during the many years of construction. (SEA p. 90)., However, these efforts to minimize these impacts "to the greatest extent practicable" does not suggest, much less demonstrate that these impacts will be "insignificant." but there is nothing in the SEA to support the conclusion that these harms to nearby residents, students, and businesses from noise, dust, other pollutants and obstacles to mobility during those many years will be mitigated to an "insignificant" level. The SEA admits at page 90 that "ODOT has also committed to restore roadways impacted by increased traffic during construction to pre-construction condition, which will primarily benefit EJ communities. Therefore, the temporary construction impacts will not result in a disproportionately high and adverse effect on EJ populations." Read that a couple of times. What ODOT admits is that the areas whose roads will be damaged (and congested, and likely gridlocked) during the extra unhealthy exhaust emissions from cars and trucks that will be routed through their neighborhood. They will primarily be the ones listening to the engine and road noise from those extra vehicles in their neighborhoods. And it will primarily be the 	Refined Alternative I (Concept I-W) is expected to result in temporary impacts for all transportation modes due to increased traffic on local roads, access restrictions, and detours. It is also expected to result in temporary utility impacts, air quality effects, noise increases, and erosion and sediment increases. Temporary economic and employment benefits are expected due to construction job creation and increased sale of construction-related supplies and services. Temporary construction impacts will be minimized and mitigated to the greatest extent practicable through the development of traffic management, maintenance of traffic, and incident management plans; coordination with local cities, transit agencies, and the regional incident management task force; notifications/outreach to public and trucking companies; and implementation of a dust control plan, measures to monitor and protect air quality, manage construction noise, and best management practices for erosion and sediment control. During construction sequencing, project highlights, and construction schedules will also be shared with the public through social media, e-newsletters, local media, presentations to local groups, and virtual project updates. A complete list of the environmental commitments incorporated into the project to minimize and mitigate temporary construction impacts is provided in Section 4.11.7 of the supplemental EA.	Environmenta Justice (4.1.7) Construction Impacts (4.11)

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			roads in their neighborhoods that will be congested and sometimes gridlocked during construction. What has ODOT promised as "mitigation" for all of those adverse impacts? In essence, they are saying: "When the project is finished construction, we will fix the roads we may have damaged or destroyed." That does not mitigate or reduce or compensate for any of these identified impacts – all it does is fix the roads that will be damaged because of constructing the project. If anything, this alone demonstrates that a finding of no significant impact cannot be issued for this project.	impacts are anticipated during construction, resulting in adverse effects on both EJ and non-EJ communities. Impacts are anticipated to be the most disruptive in the 24 census block groups that are directly adjacent to the project corridor, 12 (50 percent) of which contain minority and/or low-income populations. However, these impacts will be minimized to the greatest extent practicable through proactive communication with local cities and the public and the development of a traffic management plan, maintenance of traffic plans, an incident management plan, a dust control plan and other measures to minimize and prevent discharge of dust, measures to minimize and prevent diesel emissions, an ambient air quality monitoring program, and measures to manage construction noise. These measures will minimize construction-related disruptions in both EJ and non-EJ communities. ODOT has also committed to restore roadways impacted by increased traffic during construction to pre-construction conditions, which will primarily benefit EJ communities. Therefore, the temporary construction impacts will not result in a disproportionately high and adverse effect on EJ populations.	
		B-194-17	03/08/2024 - The SEA Fails to Adequately Address Greenhouse Gas Emissions and Climate Change: The SEA fails to even mention the Greenhouse Gas Emissions from construction – those resulting from producing and transporting the concrete, steel, asphalt, and other materials to the site, fueling the heavy equipment used to demolish existing infrastructure and to construct the billions of dollars of new infrastructure, operating lighting for night construction, and the like. Those emissions will be front-loaded, occurring during the first 4-8 years, and those emissions will remain in the atmosphere for as long as a century and will continue to cause additional	Traffic projections for the BSB Corridor Project were updated during the preparation of the supplemental EA. The comment appears to potentially reference traffic projections from prior studies. The evaluation of greenhouse gases and climate change prepared for the supplemental EA followed the guidance issued by the Council on Environmental Quality using methodologies discussed and in consultation with USEPA. The analysis was conducted at a quantitatively high level using USEPA's MOVES, which is USEPA's official model for state implementation plans and transportation conformity analyses and is listed by the U.S. Department of Transportation as the most common approach for modeling greenhouse gas emissions for transportation projects.	Greenhouse Gases and Climate Change (4.7) Construction Impacts (4.11)



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			warming year after year, adding to the resulting climate change impacts. With respect to greenhouse gas emissions from use of the expanded highway corridor, the SEA's failure to adequately account for the induced travel that will result from the expanded highways renders its estimates unreliably low. The reductions over time in the agencies' projected emissions result from factors entirely independent of this project federal fuel efficiency and exhaust emission standards and gradual replacement of current vehicles by newer vehicles with lower emissions. However, they project dramatically higher volumes of traffic in the future in this corridor than currently exist, an increase in daily traffic volume by 50% by 2035 from volumes in 2017-2021 and admit that the preferred alternative will result in 1.7% more traffic than the no build scenario. Moreover, the impacts of climate change are not limited only to those living in the immediate vicinity of the emission sources, and climate change has been recognized by both state and federal governments as disproportionately impacting low-income and minority communities.	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted using travel demand models for the project's approved certified traffic. Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions resulting from Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change. In addition, roadway construction can contribute to the total greenhouse gas footprint of on-road transportation, including emissions from extraction, transportation, and production of roadway construction materials, and emissions from fuel used onsite from construction equipment and vehicles. Construction activity. Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and vehicles. Construction activity.	



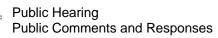
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				Avoidance, minimization, and mitigation measures incorporated into the project's environmental commitments will help to address greenhouse gas emissions during construction. These measures include developing detailed traffic management, maintenance of traffic, and incident management plans to minimize traffic congestion; requiring ultra-low sulfur diesel fuel for all diesel-powered construction equipment; prohibiting the burning of any materials on the construction site; minimizing idling time for diesel-powered equipment to the greatest extent practicable; and using solar power for digital signs to the greatest extent possible.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
		B-194-18	03/08/2024 - Traffic projections used to justify the need for a new 10-lane bridge are unreliable and absurd: Wildly inaccurate traffic projections are being used to justify a boondoggle project that only exacerbates the harms that were inflicted on minority communities when the Interstate was first constructed. Here is a graph showing in red, the highway agencies' predictions for daily automobile counts on the Bridge, and comparing the projections with the actual history of traffic counts there.	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT, KYTC, and OKI. Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. Traffic projections prepared during the preparation of the 2012 EA estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the	Purpose and Need (2.) Traffic (3.8)



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			 [The comment included a chart titled: Brent Spence Bridge Average Daily Automobile Count.] Daily automobile traffic grew from about 160K in 2005 to almost 180K in 2014, then dropped to about 135K in 2015, recovered to about 160K by 2017, and then declined again to a about 150K in 2021 and 2022, for a net decrease of about 6% over 17 years. [The comment included a table of traffic projections from various sources for various years.] The SEA says virtually nothing about the disruption caused by the pandemic, or that transformative changes had taken place over the last three plus years. The upheaval in living, working, shopping, recreating, and traveling, or any effects that all this might have in the long term on the need for expanding highways through the Cincinnati area is barely mentioned. Nor is there anything in the SEA, or its Appendices, that reflects any significant effort to assess the nature and size of current and likely future travel behaviors that would change the expected traffic demand on this corridor. This is an issue of great magnitude, rendering the agencies' astonishingly high future traffic projections even more arbitrary and unreasonable. Nor does the SEA discuss alternative methods, much less best practices, to reduce VMT, even if traffic volumes were to return to pre-pandemic levels. Increasing transit is clearly one method. Research shows that even relatively small declines in single occupancy vehicle travel - due to even modest shifts to transit – can significantly reduce traffic congestion. (Emily Badger, "A Little More 	no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region. The Initiative considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, transit alternatives would not meet the project purpose and need and are not considered to be a reasonable alternative for the BSB Corridor Project.	



ID	Name	No.	Comment	Response	Reference ¹
			Remote Work Could Change Rush Hour a Lot," New York Times (June 11, 2021)).		
		B-194-19	03/08/2024 - The failure to consider tolling to reduce congestion and eliminate/reduce the need for adding lanes. The stated purpose of this highway expansion project is to reduce congestion along the Brent Spence Corridor, allegedly justified by the agencies' inflated projections of increased future traffic demands. Neither ODOT nor OKI discuss the use of tolling or congestion pricing in a no-build scenario in their consideration of alternatives to this project. The Federal Highway Administration Office of Operations promotes congestion pricing as a "way of harnessing the power of the market to reduce the waste associated with traffic congestion." ("Welcome to the FHWA Congestion Pricing Website." Federal Highway Administration Office of Operations. https://ops.fhwa.dot.gov/congestionpricing/) While Kentucky state law may prohibit the use of tolling to finance an expansion project of this type ("a development agreement or financial plan"), no regulation exists which would prohibit the use of tolling for congestion relief in a no- build scenario. Tolling on the Ohio side of the Bridge, where Kentucky law does not apply, was not considered, making the agencies' consideration of alternatives fatally deficient. Use of tolling as a financing mechanism occurred in a similar project in Louisville, and the charging of tolls resulted in a significant decrease in traffic across a previously un-tolled river crossing. Evidence in the field of urban planning, including direct experience in the state of Kentucky, supports the use of congestion pricing or tolling as a "reasonable alternative" to highway widening for congestion	Previous tolling studies conducted by KYTC and ODOT indicate tolling the BSB Corridor would not meet the project purpose and need due to unmet travel demand. In addition, tolling would cause traffic diversion in local communities. The studies showed increased traffic primarily on the bridges crossing the Ohio River in the immediate vicinity of the cities of Covington, Cincinnati, and Newport with lower traffic diversion to I-275. During previous tolling studies for the BSB Corridor Project, local interests concentrated primarily in northern Kentucky expressed concern about the impacts of tolling and associated traffic diversion. In response to these concerns, the Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. Therefore, tolling the existing BSB is not considered to be a reasonable alternative for the BSB Corridor Project, and the project does not include tolling.	Funding (1.2.1)



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			relief, and no consideration of this alternative has been made in the development of the BSCP. Even if tolling might not eliminate the need for some highway improvements, it would certainly eliminate the need to build a new 10- lane bridge across the Ohio River.		
		B-194-20	03/08/2024 - Stormwater and water quality impacts of the project have not been adequately considered. This project proposes to add almost 40 miles of highway lane miles, plus uncounted miles of on and off ramps, in a corridor with the Ohio River at its center. The SEA assures us that this will reduce flooding and water quality impacts. The EPA raised concerns about increased chlorides and metals in runoff from an expanded highway. See SEA Part 2, page B160. However, as far as we could tell, the SEA contains not a word about the impacts on water quality of salting all of this additional roadway during winter snow or ice storms. Nor does it mention the increased toxic pollution from tire wear, brake wear, and other particulate and toxic pollutants from the increased traffic that the highway expansion will bring to this corridor. When it rains, these pollutants will add to the pollutant loads in the River. Fine particulates from tire wear, sometimes described as tire dust, have been found to be particularly toxic to various species of fish, at extremely low concentrations. See: "Tyre dust: the 'stealth pollutant' that's becoming a huge threat to ocean life," The Guardian, July 25, 2022, (available at: https://www.theguardian.com/environment/202 2/jul/25/tyre-dust-the-stealth- pollutant- becoming-a-huge-threat-to-ocean-life), and "How tyre emissions hide in plain sight," Emissions Analytics, (available at	The design, construction, and maintenance of the BSB Corridor Project will be in accordance with applicable water quality regulations. ODOT and KYTC are working to improve water quality through stormwater runoff management across all projects in their respective states. In northern Kentucky, transportation projects must address the quantity of stormwater runoff by separating interstate runoff from combined sewer systems. While only runoff from new impervious area is required to be separated, KYTC will separate all interstate runoff from the BSB corridor from the existing combined sewer system. In the Cincinnati area, transportation projects must address both the quantity and quality of stormwater runoff, both by separating stormwater runoff from combined sewer systems and providing measures known as best management practices (BMPs) to reduce stormwater pollutants. The project will separate highway drainage from the existing combined sewer District of Greater Cincinnati to build infrastructure to drain directly to Mill Creek and/or the Ohio River. To address water quality treatment requirements in Ohio, vegetated options for stormwater BMPs will be utilized to the maximum extent practicable. Given the dense urban land use in the project area, providing vegetative swales in the BSB corridor in Ohio would require additional impacts to surrounding properties. Therefore, the majority of the stormwater BMP treatment requirements will be addressed via off-site mitigation. In late 2022, ODOT and Ohio Environmental Protection Agency began discussions regarding providing offsite mitigation at a 1.5:1 ratio in the	Design Criteria (3.4) Utilities (4.12.1) Permits (4.15)

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			https://www.emissionsanalytics.com/news/how- tyre-emissions- hide-in-plain-sight). The addition of so many lane miles of high- traffic roads, and the induced traffic that that will create, will result in considerable extra tire wear during the lifetime of the expanded highway, and the SEA has not considered the impact of this at all.	 I-74 median within the same watershed as Phases I and II of the BSB Corridor Project. The technical review of the offsite mitigation will be completed during detailed design, and ODOT will continue to coordinate with Ohio Environmental Protection Agency as each project phase progresses through detailed design. Finally, KYTC and ODOT have incorporated environmental commitments into the project that require the resident engineer and contractor to develop BMPs prior to onsite activities to ensure continuous erosion control throughout the construction and post-construction period. Impacts to water quality will also be addressed as part of the Section 401 Water Quality Certification and the National Pollutant Discharge Elimination System permitting processes. 	
		B-194-21	 03/08/2024 - The Highway Expansion Would disturb or destroy habitat of several protected bat species. The SEA states at p. 139 regarding the federally protected gray bat: "Refined Alternative I (Concept I-W) will disturb or remove 4.38 acres of riparian forested habitat, which will result in the loss of potential foraging areas for the gray bat. Effects caused by the removal of this habitat will be offset by the minimization and mitigation measures described below. Therefore, the effect determination for the proposed project is "may affect, not likely to adversely affect" the gray bat." The SEA at page 139 further states regarding the federally protected Indiana bat "Approximately 90.00 acres of forested habitat that will be removed by Refined Alternative I (Concept I-W) may serve as foraging or maternity areas for Indiana bats, including 	The measures incorporated into the project's environmental commitments to minimize and mitigate the effects on the Indiana bat, gray bat, the northern long- eared bat, little brown bat, and tricolored bat that are described in the supplemental EA and quoted by the commenter. Ohio and Kentucky follow separate policies, programmatic agreements, and regulations concerning these species; therefore, each state will incorporate separate minimization and mitigation measures. In Kentucky, the mitigation measures include providing a contribution to the Imperiled Bat Conservation Fund, which will offset project-related impacts to terrestrial habitats by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts. Tree removal in Kentucky will be minimized, and no tree removal will occur from June 1 to July 31 when federally listed bats may be using those habitats. In addition, measures to protect stream areas in Kentucky will be implemented both during and after construction.	Threatened or Endangered Species (4.2.4)

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			 74.20 acres in Kentucky and 15.80 acres in Ohio." Given the nature of the project, its location, and the commitment to adhere to seasonal tree clearing restrictions (described in the minimization and mitigation measures below), the effect determination for the portion of the proposed project in Kentucky is "may affect, and likely to adversely affect" the Indiana bat. The clearing of 15.80 acres of suitable wooded habitat is all located within 100 feet of the edge of pavement. Seasonal tree clearing commitments described in the minimize impacts to Indiana bat habitat in Ohio. Therefore, the effect determination for the portion of the proposed project in Chio is "may affect, but not likely to adversely affect" the Indiana bat. At pages 139-140, it states regarding the federally protected northern long-eared bat (NLEB): "Refined Alternative I (Concept I-W) will disturb or remove 90.00 acres of forested habitat for the NLEB Seasonal tree clearing commitments described in the minimization and mitigation measures below will minimize impacts to NLEB habitat. Therefore, the effect determination and mitigation adversely affect" the Indiana bat."" 	In Ohio, the mitigation measures include avoiding tree removal in excess of what is required to implement the project safely. No tree removal in Ohio will occur from April 1 through September 30, when federally and state listed bats may be using those habitats. Ohio standards and specifications related to lighting; dust control; and water quality, wetland, and stream protection will also minimize and mitigate effects to federally and state listed bat species. KYTC and ODOT prepared a <i>Biological Assessment</i> (<i>October 2022</i>) outlining the anticipated impacts and proposed avoidance, minimization, and mitigation measures for Refined Alternative I (Concept I-W). The U.S. Fish and Wildlife Service (USFWS), and USFWS concurred with the findings of the <i>Biological Assessment</i> and determined that the requirements of Section 7 of the Endangered Species Act have been fulfilled. FHWA also coordinated with USFWS regarding the project's effects on the tricolored bat. The Commonwealth of Kentucky does not require formal coordination with state agencies for threatened or endangered species. In Ohio, a <i>Level 1 Ecological Survey Report (OH)</i> (<i>October 2022</i>) was coordinated with USFWS, the U.S. Army Corps of Engineers (USACE), the Ohio Department of Natural Resources (ODNR), and the Ohio Environmental Protection Agency (OEPA). No comments were received from USFWS, USACE, and OEPA. ODNR concurred with the effect findings for state listed species and the measures incorporated into the project to minimize and mitigate effects to state listed species.	

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			that may contain suitable roosting habitat for the tricolored bat, including approximately 74.20 acres in Kentucky and 15.80 acres in Ohio.		
			impacts to the tricolored bat are primarily anticipated to result from the removal of the 90.00 acres of wooded habitat that may potentially serve as summer maternity, roosting, and foraging habitat. Measures incorporated into the project to avoid, minimize, and mitigate impacts to the Indiana bat, the NLEB, and the gray bat will similarly reduce and minimize the likelihood of potential project impacts to the tricolored bat FHWA has determined that the project may affect but is not likely to jeopardize the continued existence of the tricolored bat, nor will it result in the destruction or adverse modification of critical habitat proposed to be designated for the species."		
			In summary, the SEA acknowledges that the removal of 90 acres of forested habitat is likely to adversely affect the Indiana bat in Kentucky, may affect the tricolored bat but is not likely to jeopardize the continued existence of the tricolored bat, and asserts that it is not likely to adversely affect the gray bat in Ohio or the NLEB. The SEA admits that clearing 90 acres of forested bat habitat may affect each of these faderally protocted appealing (and it would seem		
			federally protected species (and it would seem, the additional state protected little brown and tricolored bats). There is a real difference between on the one hand, committing to do the tree clearing consistent with a number of measures to reduce impacts (pages 145-147) and making a contribution to a bat supporting organization – and on the other hand, demonstrating that these minimization or		



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			mitigation measures would actually reduce adverse impacts to being "insignificant."		
		B-194-22	03/08/2024 - A Civil Rights Complaint Regarding This Project is Pending. The Coalition filed a Civil Rights Act, Title VI Complaint with the Highway Administration regarding this project on January 23, 2023,Complaint 2023-0134. A letter with additional information was submitted to the Office of Civil Rights on May 10, 2023. Copies of the Complaint and of the later submission are attached to these comments, as they are relevant to the SEA's discussion and conclusions regarding socioeconomic impacts, equity, and environmental justice. We respectfully suggest that it would be inconsistent for the FHWA to issue a finding of no significant impact and/or a record of decision regarding this project while a Civil Rights investigation regarding the project is pending.	The supplemental EA was prepared pursuant to NEPA. The FHWA Office of Civil Rights is responding to the referenced correspondence as part of a separate process.	N/A
		B-194-23	03/08/2024 - Adoption of Comments by Other Organizations. We agree with and adopt the comments submitted by the Sierra Club Miami Group Ohio Chapter, and by Bridge Forward in response to the SEA, without repeating and setting them forth in this document.	KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including those provided by the organizations and groups referenced by the commenter, prior to FHWA making a final decision on the supplemental EA. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	Public Hearing (5.5)
		B-194-24	03/08/2024 – Conclusion. For all of the above reasons, we submit that the Spence Brent Bridge Corridor Project, Refined Alternative 1- W, would result in significant impacts to the natural and human environments, and that the	The supplemental EA has been prepared consistent with Title 23 CFR §§ 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental	Introduction (1



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			Supplemental Environmental Assessment does not demonstrate that approval of the Project would result in no significant impacts to the environment. As a result, the agencies are required to prepare a full Environmental Impact Statement, and to take necessary "hard look" at the entire range of issues raised by the Project.	commitments (enhancements and mitigation), and additional NEPA reevaluation and coordination efforts that have occurred since the 2012 EA/FONSI. The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	
				The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	
B-195	Meyer, David	B-195-1	03/08/2024 - Thank you for all the hard work and time being spent on this very important project. Generally, I am very supportive of the project happening and the public money being spent. The current corridor infrastructure has many flaws that I believe the latest design will significantly improve. The addition of freeway safety shoulders, the return of land to the City of Cincinnati, the improvement of overpass and underpass crossings for active transportation users are all fantastic. That said, I also believe the latest design has shortcomings that I hope will be addressed. I believe the project is oversized, and shrinking it will have significant benefits now and into the future. The southbound 75 exit to Seventh Street currently shows 2 freeway lanes exiting from the mainline (shown in blue in Exhibit A). This	Existing and historic traffic counts for the Brent Spence Bridge (BSB) were compiled using a variety of data generated by ODOT, KYTC, and the Ohio-Kentucky- Indiana Regional Council of Governments (OKI). Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre- COVID base year of 2019. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an	Traffic (3.8)

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			may have made sense pre-pandemic, but it no longer does. I am aware that the 7 th Street exit will take on the traffic from the 5 th Street exit which is being eliminated. However, data from ODOT's website shows the following: • 2018, 5 th Street – AM peak hour = 620, rest of the day 250 per hour with no PM peak • 2018, 7 th Street – AM peak hour = 1100, rest of the day 200 per hour with no PM peak • 2021, 5 th Street – AM peak hour = 425, rest of the day 225 per hour with no PM peak • 2021, 7 th Street – AM peak hour = 550, rest of the day 200 per hour with no PM peak • 2021, 7 th Street – AM peak hour = 550, rest of the day 200 per hour with no PM peak • 2021, 7 th Street – AM peak hour = 550, rest of the day 200 per hour with no PM peak Pre-pandemic one freeway exit lane would have worked for the existing AM peak traffic, but it's understandable that normal traffic growth could justify a second lane. Post pandemic, the proposed two exit lanes make no sense. Due to the office to residential conversions occurring downtown it is almost inconceivable that we could return to pre- pandemic AM peak traffic volume levels. Because of more people living downtown, leased office space would likely need to be higher than pre-pandemic levels to generate pre-pandemic level traffic. Traffic may have increased from 2021, but at the very least a new count should be collected to see where volumes are right now. Please consider removing a lane from southbound 75 to 7 th Street. This reduced lane can carry back to the Western Hills Viaduct connecting to the existing 5 SB lanes instead of growing to 6 lanes. I think the southbound exit ramp is the most pronounced example of local traffic being overestimated. But the trend likely exists for all downtown exits in Cincinnati and Covington. Really a revisit to all local traffic projections and lane analyses is warranted.	Interchange Modification Study Addendum (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The Interchange Modification Study Addendum used the updated traffic projections to vet and confirm the number of lanes on the interstate, ramps, collector-distributor roadways, frontage roads, and local street intersections in the project area. The Interchange Modification Study Addendum (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods.	

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		B-195-2	 03/08/2024 - It is also my opinion that thru traffic lanes should be reduced as well. This is less based on data, and more based on policy and principle. I am aware that lots of work has gone into regional travel demand models for this project. However, instead of expanding freeways for traffic growth, we should be focusing on alternative modes of travel for the future. I'm going to focus on I-75 because I feel the 2 freeway lanes in each direction for I-71 through the project area is appropriate. I-75 is becoming an 8-lane freeway north of I-74. I don't have significant issue with this, but I also feel that if there's 8 lanes of travel demand, then there's enough travel demand to support public transit on that corridor. Same with I-71/75 in Kentucky. We need to implement meaningful public transit along this corridor so that it is never necessary to go to a 10-lane (or more) freeway. Sure, it will require lots of planning and it won't be cheap, and it won't take off right away. But if we start soon and do it well, it will be robust enough in 20 years to prevent the need for that 5th lane in each direction. Considering ODOT is spending over \$900 million to go from 6 lanes to 8 lanes – the money spent on public transit will be well worth it to prevent another two decades of construction and expense. This speaks to the BSB project because it is apparent that the BSB corridor is being designed for 40+ years of growth. But designing for that much growth shouldn't be necessary because we should instead be planning and building robust public transit for our busiest corridors. Three through lanes on I-75 in each direction over the bridge is too many. Please consider reducing it to two 	Traffic operational analysis for Refined Alternative I (Concept I-W) used certified traffic projections for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <i>North South Transportation Initiative</i> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit alone would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project. The Initiative concluded that a highway improvement project was necessary to address capacity issues on I-75, including the BSB Corridor. While the original findings of the Initiative called for four lane continuity in each direction on I-75, traffic analyses completed as part of ODDT's Millcreek Expressway and Thru the Valley projects determined that five lanes were needed south of the I-74/I-75 interchange. This change was approved by OKI. The BSB Corridor Project addresses the highway component of the Initiative by improving interchanges and providing the number of lanes previously approved by OKI. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. The transit component included in the Initiative must be developed and championed regionally, and ODOT and KYTC are ready to support this when it is advanced at a regional level.	Purpose and Need (2.) Traffic (3.8) Travel Patterns and Access (4.1.4)

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			through lanes in each direction. The separating of local traffic will allow two exclusive I-75 lanes to function acceptably today, and the public transit implementation will prevent it from failing in the future.	The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-195-3	03/08/2024 - In the southbound direction is it possible to connect the I-75 thru lanes to the local bridge lanes immediately south of the 5 th Street overpass, as shown in magenta in Exhibit A? This would be a right lane drop exit where only two I-75 lanes would continue onto the new bridge. If possible, I feel there are significant advantages to this. In the current design the Covington exits are combined with the downtown Cincinnati exits at a split at Ezzard Charles. This early exit will add Covington to very crowded signage that will be easy for drivers to miss. Instead the split at Ezzard Charles should only be for for US 50 and all Cincinnati exits (7 th , 3 rd , 2 nd). Then the left three I-75 SB lanes would simply be signed "I-75 South to Kentucky". After that the right hand lane drop happens which is signed "All Covington Exits". This is much more intuitive for drivers. Also, as I mentioned, I feel there	The receipt of Exhibit A, which shows schematically the connection and changes in lane use described by the commenter, is acknowledged. The suggested connection would present geometric, constructability, and cost concerns due to the need to build an additional bridge over multiple ramp roadways in a highly constrained area. In addition, the required roadway grades and addition of another merge between the areas where US-50 and I-71 merge into the southbound collector-distributor system would present additional safety concerns. As a result, the connection and associated changes in lane use described by the commenter would not meet the project purpose and need, and they are not recommended for further consideration. The project will install new signing on I-71/I-75 throughout the project area. The design and locations of highway signs, including signing and wayfinding for the collector-distributor roadway system, will be finalized during	Design Criteria (3.4)

ID	Name	No.	Comment	Response	Reference ¹
			should only be two I-75 lanes on the new bridge. However, the Covington lane drop exit would provide a relief valve for thru 75 for the few times that congestion may occur. This would make the new bridge 8 lanes instead of 10 (reducing the cost).	detailed design and in accordance with current design standards and guidelines.	
		B-195-4	03/08/2024 - See Exhibit B for 71/75 suggestions in Covington. I won't write a lot here because this email is already super long. Removing a thru lane from I-75 is recommended and will reduce the truly staggering number of lanes in Covington. Separating the Cincinnati local exits from the Covington local exits will make things more intuitive – same as recommended in the previous paragraph for SB 75. Some local access lane reductions are recommended as well. Altogether, the lane reductions will reduce the impact to adjacent properties including Goebel Park.	The receipt of Exhibit B, which shows schematically the suggested changes in Covington, is acknowledged. The suggested new exit would result in additional property impacts and costs due to the need to widen the bridge over West 12 th Street, West 11th Street, and West Pike Street in Covington. The number of lanes on the mainline interstate and the collector-distributor system were vetted and confirmed using updated traffic projections in the <i>Interchange Modification Study Addendum</i> . Therefore, the suggested changes in Covington that are described by the commenter would result in greater impacts and costs and would not meet the project purpose and need; therefore, they are not recommended for further consideration. The project will install new signing on I-71/I-75 throughout the project area. The design and locations of highway signs, including signing and wayfinding for the collector-distributor roadway system, will be finalized during detailed design and in accordance with current design	Design Criteria (3.4)
		B-195-5	03/08/2024 - These recommended lane reductions have the great side effect of reducing the cost of the project. The leftover money can be diverted to smaller local safety projects which tend to have a greater impact and ROI towards the current critical Vision Zero goals. I'm really hoping that these lane reductions will be meaningfully considered. The smaller footprint along with the proposed	standards and guidelines. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked with the City of Covington and the City of Cincinnati to incorporate several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7)



ID	Name	No.	Comment	Response	Reference ¹
			context sensitive design for the project. I'm certainly happy and willing to discuss these ideas further.	criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge.	
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; and minimizing the footprint of the interstate system to maximize potential developable space.	
B-196	Zaffer, Alexis Kidd	B-196-1	03/08/2024 - Greetings Members of Council, On behalf of Seven Hills Neighborhood Houses, please find attached our support letter for the Bridge Forward project proposal. As mentioned in our proposal last week, Seven Hills believes that this project is critical to West End Renewed. This is also one project that various organizations within our neighborhood agree upon. We hope you will join all of us and support the Bridge Forward project.	The comment consists of a copy of an email (dated March 8, 2024) and a letter (dated March 6, 2024) that were directed to the Cincinnati City Council indicating support for concepts developed by Bridge Forward. Therefore, no response, other than to document the attachment as received, is provided. KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including those provided by the City of Cincinnati and Bridge Forward, prior to FHWA making a final decision on the supplemental Environmental Assessment. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	Public Hearing (5.5)
B-197	Zaffer, Alexis Kidd	B-197-1	03/08/2024 - Attached is the support letter provided by Robert Killins Jr.	The comment references and includes a letter dated March 7, 2024 that was directed to the Cincinnati City	Public Hearing (5.5)



ID	Name	No.	Comment	Response	Reference ¹
				Council indicating support for concepts developed by Bridge Forward. Therefore, no response, other than to document the attachment as received, is provided.	
				KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including those provided by the City of Cincinnati and Bridge Forward, prior to FHWA making a final decision on the supplemental Environmental Assessment. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	
B-198	Beltran, Daniella	B-198-1	03/08/2024 - I am a Cincinnati resident and urban planning professional. I have been following this project and appreciate the revisions and updates made to minimize the amount of land dedicated to vehicular travel. I question the traffic projections that are based on assumptions that as population increases so does personal vehicle ownership and use at an equal rate. On the contrary, population increases make public transit and alternative modes more feasible and efficient.	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic</i> <i>Forecasting Manual</i> , and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> (December 2023), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	Traffic (3.8)
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected population and employment growth incorporated into OKI's regional travel demand model. The <u>Interchange Modification Study</u> <u>Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year	



ID	Name	No.	Comment	Response	Reference ¹
				2049, with a few minor exceptions during peak travel periods.	
		B-198-2	03/08/2024 - I recognize a new bridge is needed. I ask that ODOT and project participants seriously consider and incorporate the concepts posed by the Bridge Forward campaign, specifically those that describe ways to build a street grid to connect Downtown Cincinnati with Queensgate and the West End. The original construction of I-75 did a tremendous amount of harm to these formerly dense neighborhoods. It is imperative that this reconstruction project create new connections that allow place building. New gridded streets enable development and cohesion. This is critical to the future of this region.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. In addition, ODOT is continuing to coordinate local connections with the City of Cincinnati. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporated into Refined Alternative I (Concept I-W) address many of the priorities articulated by Bridge Forward, including minimizing the footprint of the highway; using the interstate primarily as an efficient processor of regional, through traffic; providing a network of safe, multimodal streets for local traffic; and using only modern, progressive engineering practices. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be	Purpose and Need (2.) Alternatives (3 Future Design Refinements (3.7) Neighborhood and Communit Cohesion (4.1.2) Travel Patterns and Access (4.1.4) Public Comments (5.1.1)



ID	Name	No.	Comment	Response	Reference ¹
				incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary (January 2024)</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
		B-198-3	03/08/2024 - Current designs also lack dedicated and protected space for micro- mobility. E-bike, scooters, hoverboards, and I expect soon enough golf carts are and will be ways that people get around the Cincinnati area. All of us taxpayers who don't own personal vehicles deserve to safely make use of public streets. Please incorporate dedicated space for this existing range of users.	Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Westside, Mainstrasse, Lewisburg, Botany Hills, and Covington Central Business District (CBD) neighborhoods in Kentucky and the Cincinnati CBD Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared-use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks. These accommodations will also support other forms of micromobility within the project area.	Travel Patterns and Access (4.1.4)
B-199	Gressley, David	B-199-1	03/08/2024 - I would like to see two infrastructural amenities included with the Brent Spence Bridge:	Due to design and maintenance considerations, trees will not be planted on the new companion bridge. Areas within the interstate right-of-way will be vegetated in accordance	Visual Resources (4.9)



ID	Name	No.	Comment	Response	Reference ¹
			1. Include as much green space for trees as possible in all buffer areas and be the first interstate bridge that allows for trees to be planted in an allée across the Ohio River. See this link for possibilities: https://www.minnpost.com/cityscape/2023/02/b etter-design-can-reduce-the-useof-road-salt- preventing-pollution-in-minnesotas-water/	with the KYTC Standard Specifications and the ODOT Construction and Material Specifications. ODOT and KYTC will continue coordinating with the Ohio, Covington, and Fort Wright/Fort Mitchell Aesthetic Subcommittees to finalize landscaping plans in those portions of the Brent Spence Bridge (BSB) Corridor.	
		B-199-2	03/08/2024 - 2. Design the bridge with provisions to add a light rail link so Metro's rail link will be able to serve Covington and northern Kentucky if we should ever get such a luxury.	In 2004, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation</u> <u>Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, passenger rail would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project. The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	Purpose and Need (2.)
B-200	Laber, Ryan	B-200-1	03/08/2024 - Bridge Forward Cincinnati ("Bridge Forward" and/or "BF") is communicating 40 comments, which are the opinions of multiple BF members, regarding the draft SEA. The comments have been compiled into this consolidated letter. We ask that each individual comment be given its due consideration and response, and that the	Each point outlined in the Bridge Forward Cincinnati letter dated March 8, 2024 is provided a response below.	N/A



ID	Name	No.	Comment	Response	Reference ¹
			totality of the comments considered together result in new environmental commitments for the Project.		
		B-200-2	03/08/2024 - Introductory Comments 1. Currently, the Brent Spence Bridge Corridor ("BSBC") in the urban core of Cincinnati is an infrastructure barrier, which "can be defined as all forms of transport infrastructure that reduce or remove opportunities for movement from one location to another," including highways. There are no local street east-west connections between the CBD and Queesgate, anywhere between 3 rd Street and the 6 th Street Expressway, and all of the east-west connections between the 6 th Street Expressway and Linn Street to the north take the form of high-speed directional ramps. There are only three accessible pedestrian connections between 3 rd Street and Linn Street, which are located along the high-speed ramps of the 6 th Street Expressway, the 7 th Street Viaduct, and the 8 th Street Viaduct, and these pedestrian connections average over a third of a mile in length each from block to block.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. In addition, ODOT is continuing to coordinate local connections with the City of Cincinnati.	Travel Pattern and Access (4.1.4)
		B-200-3	03/08/2024 - 2. As currently proposed, the Project does nothing to alleviate this infrastructure barrier in the area just discussed; no new east-west connections in this area are proposed; the barrier remains for the lifespan of the Project.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge (BSB) Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support	Purpose and Need (2.) Future Design Refinements (3.7)



ID	Name	No.	Comment	Response	Reference ¹
				design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community.	
		B-200-4	03/08/2024 - 3. It is well-documented that the local host neighborhoods of the Project are socio-economically and environmentally challenged. See the letter submitted by Bridge Forward dated 3/4/23 (pdf pages 16-38, especially pdf pages 23-25) as well as communications from the Coalition for Transit and Sustainable Development ("CTSD") and other groups. As noted in the BF letter, Census Tract 2 bordering the Project is even considered to be a Transportation Disadvantaged Census Tract by USDOT. Infrastructure barriers cause harm to their host communities, by cutting off people and business from opportunities of all kinds. This reality applies to the BSBC host communities too. Leaving the BSBC infrastructure barrier in place ensures continued harm done to the local host community for the lifespan of the Project.	Refined Alternative I (Concept I-W) meets the project purpose and need. Refined Alternative I (Concept I-W) maintains all existing vehicular connections across I-75 in Ohio. Refined Alternative I (Concept I-W) also incorporates the following features to maintain and enhance pedestrian and bicycle connections in Ohio: a reconstructed sidewalk on 3 rd Street; a new shared-use path on 6 th Street; maintaining the existing 7 th Street connection to Gest Street with a new shared-use path connecting to Central Avenue; a new shared-use path on 8 th /9 th Street; a new sidewalk, shared-use paths, and/or bike lanes on Linn Street; a connection between Freeman Avenue and West Court Street via a sidewalk and a new pedestrian bridge; a new sidewalk and shared-use path on the Ezzard Charles Bridge; and reconstructed sidewalks and buffered bike lanes on Liberty Street, Findlay Street, Bank Street, and Harrison Avenue.	Travel Patterns and Access (4.1.4)
		B-200-5	03/08/2024 - 4. Accordingly, the SEA must consider the long term effect of the Project, rather than just the impact of the Project. Coming rulemaking from the Council on Environmental Quality (CEQ) emphasizes effect, asking for stronger consideration of long-term impacts. For this Project, which will be in service for likely 100 years, and which will cost taxpayers nearly \$4 billion, the long-term environmental effects that BF is raising must be considered paramount.	The supplemental EA has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act (NEPA) reevaluation and coordination efforts that have occurred since the 2012 Environmental Assessment (EA) and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of	Introduction (1.) Environmental Commitments (Section 6. and ES-Table II)



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				potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI.	
				The supplemental EA evaluates the potential direct, indirect, and cumulative effects of the entire 7.8-mile BSB Corridor Project. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). Environmental commitments have been incorporated into the project to minimize and mitigate unavoidable impacts and to provide additional enhancements for local communities.	
		B-200-6	03/08/2024 - 5. As is well-documented, the construction of the original BSBC in Cincinnati's urban core contributed to the displacement of over 25,000 residents – most of whom were Black –and to the shuttering of hundreds of businesses, resulting in widespread destruction of community and familial wealth. The Project is the first massive reinvestment in the same Corridor and is inextricably linked to the past history of the Corridor. There is an obligation to affirmatively right some of these past wrongs.	Refined Alternative I (Concept I-W) was evaluated for cumulative effects specific to minority and low-income (environmental justice) populations. Refined Alternative I (Concept I-W) will result in a minor contribution to cumulative residential and commercial displacements and a cumulative loss of parkland and historic resources in these communities. These minor cumulative effects will be experienced by all populations and communities, including environmental justice (EJ) populations and non- EJ populations. Cincinnati's West End, now partitioned into the Queensgate and West End neighborhoods, is an area with known EJ populations that was historically impacted by urban renewal plans that were common in the United States in the mid-twentieth century. Refined Alternative I (Concept I-W) requires one commercial relocation (a small printing shop) in the West End neighborhood. In addition, the footprint of Refined Alternative I (Concept I-W) has been reduced and requires only minor amounts of strip right-of-way in the West End neighborhood. Refined Alternative I (Concept I-W) will not add to or exacerbate any adverse effects in the West End neighborhood. Refined Alternative I (Concept I-W) will not add to or exacerbate any adverse effects in the West End community from prior actions or events. In recognition of the history of City-sponsored urban renewal and the original Mill Creek Expressway (I-75) construction and as	Environmental Justice (4.1.7) Cumulative Effects (4.10.2)



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				an enhancement in the West End neighborhood, ODOT will work with the City of Cincinnati, which includes the West End Community Council, to develop content for an interpretive display describing the West End community in relation to historic City urban renewal and the Millcreek Expressway construction and to identify a location in proximity to the I-75 corridor to install the display.	
				Refined Alternative I (Concept I-W) will improve community cohesion; improve traffic flow and safety for all modes of travel; improve air quality; abate noise; reduce flooding and combined sewer overflows; improve aesthetics; and provide additional economic opportunities, which will help to offset any cumulative effects from past, present, and reasonably foreseeable actions. Therefore, no adverse cumulative effects on EJ populations are expected to occur as a result of Refined Alternative I (Concept I-W).	
		B-200-7	03/08/2024 - 6. Bridge Forward is a pro-build, pro-bridge, pro-Project group, because we believe affirmative action to correct the existing BSBC infrastructure barrier is obligatory for ensuring just environmental conditions for the local host communities of the BSBC.	No response to this comment, other than to acknowledge the priorities of the Bridge Forward group, can be provided.	N/A
		B-200-8	03/08/2024 - 7. However, we believe that the Project, from its conception, has not taken seriously enough the need to correct the existing infrastructure barrier. For example, during discussion of how the Project will impact the adjacent transportation disadvantaged communities –which are located within Cincinnati's urban core adjacent to the region's economic engine, the CBD – the BSMT's MPDG application narrative (pdf pages 167- 195) states that the Project will "reduce barriers to local economic opportunity, including for disadvantaged communities, through better connections [via the interstate] to regional job	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to benefit surrounding communities, such as reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; incorporating aesthetic treatments throughout the corridor, and providing new and improved pedestrian and bicycle infrastructure that will improve	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7)



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			opportunities" (application page 14; pdf page 184). And, "I-75 directly connects disadvantaged neighborhoods in Covington and Cincinnati to the greater region and key employment centers, education facilities, and health/cultural institutions" (application page 17; pdf page 187). Instead, BF believes that the Project is obligated to better serve local residents by delivering a context sensitive design that reverses the existing BSBC infrastructure barrier, unlocking opportunities, for instance, that local residents could, but for the BSBC barrier, walk to. We feel this would be a stronger proposal than the provision of a means, via the interstate, to exit the local neighborhood quickly.	access in and between the neighborhoods in the project area. Some of the design-build contract objectives that KYTC and ODOT will consider during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	
		B-200-9	03/08/2024 - 8. Furthermore, Cincinnati's urban core is landlocked, with the Ohio River to the south, Mt. Adams' topography to the east, a National Historic District which limits new construction to the north, and the BSBC to the west. In fact, the BSBC in Cincinnati's urban core occupies roughly 55 acres of extremely valuable real estate that is not being put to its highest and best use, thereby limiting the economic potential of the region and specifically the impacted host communities discussed above. Fortunately, in the BSMT's MPDG application (pdf pages 167-195), there is a commitment to support "sustainable development patterns" (application page 2; pdf page 172), as well as a commitment to "support integrated land use, economic development and transportation planning" (application page 15; pdf page 15). To honor these commitments, we ask for flexibility and an innovative approach during the design phase of the Project to ensure that substantial additional	Based on coordination with the City of Cincinnati, Refined Alternative I (Concept I-W) incorporates minor reconfigurations to the 2 nd Street, 3 rd Street, 4 th Street, 5 th Street, 6 th Street, and 7 th Street ramps in downtown Cincinnati that will open up approximately 10 acres of land for potential redevelopment and/or public use. Based on further coordination with the City, ODOT has committed to building a wider bridge on Ezzard Charles Drive over I-75. The widened bridge will provide an additional 50 feet of green space on each side that could support potential future civic space or retail development by the City of Cincinnati. ODOT will fund the cost of the bridge design and will share the construction cost with the City. ODOT and the City will develop cost sharing and maintenance agreements prior to construction. One of the design-build contract objectives that KYTC and ODOT will consider during the evaluation of innovation concepts is minimizing the footprint of the interstate system to maximize potential developable space. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract	Additional Refinements (3.3) Future Design Refinements (3.7)

ID	Name	No.	Comment	Response	Reference ¹
			land be returned to the City from the BSBC's sprawling footprint.	objectives, and have support at the local level may be incorporated into the project.	
	B-200-10	B-200-10	03/08/2024 - 9. However, current Project plans show that there has been no update to the horizontal alignment of the I-75 mainline. Instead, the planned mainline continues to unnecessarily bow/bend to the east immediately adjacent to the CBD, despite years of engagement from our group asking for additional innovation and additional land returned. If innovation with respect to the mainline alignment is limited, benefits in terms of land returned will also be limited.	The design of Refined Alternative I (Concept I-W), including the layout of the interstate mainline and the ramp network in downtown Cincinnati, was developed in accordance with the most current versions of the KYTC <i>Highway Design Guidance Manual</i> and the ODOT <i>Location and Design Manual</i> . Some of the design-build contract objectives KYTC and ODOT will consider during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	Design Criteria (3.4) Future Design Refinements (3.7)
		B-200-11	 03/08/2024 – Comments Related to Public Involvement 10. Bridge Forward has been proactive in reaching out to the community to discuss the Project and the implications and opportunities therein. We have done so consistent with standards established in USDOT's October, 2022, Promising Practices for Meaningful Public Involvement in Transportation Decision- Making, and with the USDOT's September, 2023, Equity Action Plan 2023 Update. In the later publication, it is stated that: "Agencies are often focused on compliance when it comes to public involvement. Measures of inputs, such as number of meetings, are not distinguished 	KYTC and ODOT have conducted extensive public involvement during the development of the BSB Corridor Project, as documented in the <u>Public Involvement</u> <u>Summary</u> (January 2024). Public involvement will continue to occur during the design and construction of the project. Furthermore, KYTC and ODOT will continue coordinating with the Project Advisory Committee and local agencies and stakeholders, who will continue to act as liaisons to the communities immediately affected by the project.	Public and Stakeholder Involvement (5.1) Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)



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			from measures of impacts, such as changes to a proposed plan or project." That has not been		
			the case with Bf. We began our outreach		
			efforts with community members in early 2021,		
			even approaching Cincinnati Mayoral candidate		
			Aftab Pureval at that time. And, we have		
			updated our thinking and our proposed vision for this project based on input from multiple		
			community members. The following are a few		
			documented instances of community		
			engagement by BF and community support for		
			BF:		
			a. Multiple presentations to Community		
			Councils, resulting in letters of support from the West End Community Council, Camp		
			Washington Community Council, Over-the-		
			Rhine Community Council, Downtown		
			Residents' Council Inc., Mt. Auburn Community		
			Council, and Columbia Tusculum Community		
			Council, as well as a letter of support from important West End institution Seven Hills		
			Neighborhood D558Houses (pdf pages 196-		
			208).		
			b. Multiple community meetings and meetings		
			with important local institutions documented in		
			our 4/24/23 Community Engagement & Participation Plan (pdf pages 209-555).		
			c. A large town hall held at Messer		
			Construction's headquarters in the West End		
			on 3/4/23.		
			d. Bridge Forward is supported in the Cincinnati		
			Metropolitan Housing Authority's Choice Neighborhood Plan sponsored by the US		
			Department of Housing and Urban		
			Development.		
			e. Community Conversation Event, attended by		
			about 150 people, held at Union Terminal on		
			June 21, 2023.		
			f. Supported by the Cincinnati Regional Business Committee (CRBC).		



ID	Name	No.	Comment	Response	Reference ¹
			 g. Over 800 letters of support sent in support of the Bridge Forward vision, including Westway Emails and Cincinnati Process Improvement Emails, which were organized by members of the Bridge Forward coalition (see pdf pages 556-687 for letters of support sent since the last batch of letters released to the BSMT on 10/30/23 and therefore not yet included in the Public Involvement Summary). h. Gave (4) presentations to the Cincinnati Council Committee on Climate, Environment, & Infrastructure ("CE&I") during 2023. i. 36 of 64 (56%) of public comments given to CE&I at City Hall in 2023 were explicitly in support of BF. j. Online survey with 374 total responses informing the BF vision (see pdf pages 688-1120 for survey responses released to the BSMT on 2/21/23 and therefore not yet included in the Public Involvement Summary). The vast majority of respondents want local government to represent their interests in the Project, and the vast majority of respondents agree that "with funding secured, take the time to get the design right before starting construction." k. BF has been substantially featured in multiple news articles (see pdf pages 1121-1329). l. The Bridge Forward public involvement effort has been a herculean effort, made in good faith, to attempt to improve the environmental impact of the Project for the local Cincinnati community in addition to the needs of regional through traffic, worthy of a nearly \$4 billion investment of taxpayer money. 		



ID	Name	No.	Comment	Response	Reference ¹
			3/4/23 at Messer Construction's headquarters in the West End neighborhood of Cincinnati.]		
			[The comment included three photographs with the caption: Three photos taken during the community Conversation Event at Union Terminal on 6/21/23.]		
		B-200-12	03/08/2024 - 11. In contrast, we do not feel that the BSMT, especially in Ohio, has been adequately receptive to public involvement. Bridge Forward has filled the void. As stated in the SEA, "the project was placed on hold in 2015, with no substantial public comments received between 2015 and 2021" (SEA page 269). Since then, the SEA documents public involvement in two main camps: those who support the BF, pro-build concept of reduced footprint and increased connections, and those who want a no-build solution. Starting in 2021 with a letter from the West End Community Council dated 10/25/2021, and as conveyed above, the wider BF coalition and supporters at large have made herculean efforts to engage with the BSMT in good faith to develop a concept that addresses the express desires and needs of the community. Unfortunately, the only committed outcomes from this public involvement documented in Section 5.1.2 of the SEA are related to the return of approximately 10 acres of land (which is discussed below), restoration of roadways damaged during construction, a wider bridge on Ezzard Charles (which we applaud but which has never been a focus of BF), and a commitment to re-evaluate design concepts. As will be discussed below, we believe hard commitments, not commitments to re-evaluate, in response to public involvement are required before the approval of this SEA.	KYTC and ODOT have conducted extensive public involvement during the development of the BSB Corridor Project, as documented in the <u>Public Involvement</u> <u>Summary</u> . Efforts have included: updating the project website; establishing social media accounts; distributing e-newsletters; conducting 12 small-scale and 4 broad- scale targeted EJ/neighborhood outreach meetings; and holding 2 open-house style project update meetings. KYTC and ODOT have evaluated and responded to all comments received during the project's development. Members of the public were also provided the opportunity to review the supplemental EA, attend in-person and virtual public hearings, and provide comments to KYTC and ODOT during the 30-day public availability period. To make sure that all populations were aware of these opportunities, postcards advertising the availability of the supplemental EA and the public hearings were delivered to nearly 50,000 mailboxes in the greater Cincinnati/Northern Kentucky area. Public involvement will continue to occur during the design and construction of the project. Furthermore, KYTC and ODOT will continue to act as liaisons to the communities immediately affected by the project. Community members generally supported the refinements, mitigation, and enhancements incorporated into Refined Alternative I (Concept I-W), including the reduction of the project footprint, additional developable land, additional noise and noise/visual screening barriers, measures to reduce flooding and combined sewer	Future Design Refinements (3.7) Public and Stakeholder Involvement (5.1) Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)

ID	Name	No.	Comment	Response	Reference ¹
				overflows, new and improved multimodal facilities, and aesthetic features. Throughout the project's development, the public offered additional feedback and suggestions. KYTC and ODOT have incorporated several refinements into Refined Alternative I (Concept I-W) in direct response to the additional comments and feedback that were gathered, including the refinements referenced by the commenter. These refinements are incorporated into the environmental commitments for the project.	
				As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have also held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
		B-200-13	03/08/2024 - 12. There are two clear instances where the concerns of citizens who have spoken up in favor of the BF vision were minimized. On July 28, 2023 an ODOT spokesperson said "Bridge Forward's proposal will be treated as one of the hundreds of public comments that have been received." And, on September 6, 2023, an ODOT spokesperson says that ODOT "plan[s] to engage the Walsh Kokosing team with all public comments. Bridge Forward is one of those public comments." The BF vision is significant because it resonates with so many concerned citizens – and in fact the stated goals of the IIJA – and therefore should not be minimized.	KYTC and ODOT have considered and prepared responses to all public comments, including several concepts submitted by Bridge Forward, which are included in the <u>Public Involvement Summary</u> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	Future Design Refinements (3.7) Public Comments (5.1.1)



ID	Name	No.	Comment	Response	Reference ¹
		B-200-14	03/08/2024 - 13. Additionally, in late 2022, an ODOT project manager told the Vice President of the West End Community Council that ODOT "believes BF is only two guys" and that BF – and therefore its constituents as well – were being treated accordingly.	KYTC and ODOT have considered and prepared responses to all public comments, including several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	Future Design Refinements (3.7) Public Comments (5.1.1)
		B-200-15	 03/08/2024 - 14. The SEA correctly states some of BF's goals (minimizing footprint; using interstate for regional through traffic; providing safe multi-modal streets for local traffic; using progressive engineering practices), but other BF goals previously communicated directly from BF (see 3/4/23 letter) as well as from our members and supporters in the Westway Emails and Cincinnati Process Improvement Emails are absent from the SEA discussion. These goals are: a. Maximize the number of local streets that are designed according to the NACTO Urban Street Design Guide or similar; b. Maximize the number of pedestrian connections between the CBD, Queensgate, and the West End, and minimize the walking distance of each of those connections; c. Maximize the amount of walkable street frontage that is conducive to street facing development within and adjacent to the project footprint; d. Incorporate, in the adjacent communities, of features/elements that serve to memorialize the historic lower West End neighborhood and the systematic displacement of tens of thousands of Black residents, in part, to make way for I-75's construction through the City of Cincinnati; (i) We applaud commitment #31 in the SEA; thank you. e. Minimize the number of lane miles using 	KYTC and ODOT acknowledge the priorities of the Bridge Forward group. All comments received from Bridge Forward and its members and supporters, including the Westway Emails and the Cincinnati Process Improvement Emails, were considered. Details regarding how those concerns are addressed were provided in the supplemental EA and the <i>Public Involvement Summary</i> . The <i>Public Involvement Summary</i> includes copies of Bridge Forward comments in Appendix K, the Westway Emails and the detailed response prepared by KYTC and ODOT in Appendix L, and the Cincinnati Process Improvement Emails in Appendix N.	Public Comments (5.1.1)



ID	Name	No.	Comment	Response	Reference ¹
			high-speed directional ramp; and f. Achieve best expenditure of public dollars measured in life-cycle return on investment.		
		B-200-16	03/08/2024 – 15. In fact, BF has always been clear about the major tenants of our vision. In the Working Position Paper – which was never represented as either a final product or as an engineering proposal – there are renderings of the Columbus, Ohio, Columbus Crossroads/Downtown Ramp Up project at I-70 and I-71. BF is not a radical group. We have simply wanted to see the best practices being implemented in other parts of the country and being discussed by leaders such as Secretary Buttigieg implemented in our local community. We see that the type of vision BF has been promoting is demonstrably possible by ODOT District 6's own work in Columbus. Cincinnati deserves the same quality work as Columbus is receiving.	No response to this comment, other than to acknowledge the vision of the Bridge Forward group, can be provided.	N/A
		B-200-17	03/08/2024 - 16. On June 21, 2023, Bridge Forward volunteers staffed a Community Conversation Event, attended by about 150 people, held at Union Terminal on June 21, 2023. Prominent national figures presented in a panel discussion, including former FHWA Chief Council and current Partner at Venable LLP, an environmental law firm in DC, Fred Wagner, as well as former FHWA Deputy Administrator and current Livability Director at Minnesota DOT, Gloria Jeff. Then a public forum-style conversation was had among attendees. Leaders of the BSMT as well as the local FHWA were invited to attend by BF members and by a Cincinnati City Councilmember, but they affirmatively declined to attend, which was very disappointing (see pdf pages 1337-1342).	The meeting referenced by the commenter was privately sponsored and was not an official project meeting for the BSB Corridor Project. Representatives from FHWA, KYTC, and ODOT did not attend.	N/A



ID	Name	No.	Comment	Response	Reference ¹
		B-200-18	03/08/2024 - 17. Following a good amount of communication in early 2022 between BF and the BSMT, BF heard very little if anything from the BSMT; until, on October 5, 2022, ODOT released a pair of feasibility studies of BF concepts to the press as press releases. This pair of feasibility studies/press releases are labeled "Response to public comment – Working Position Paper: Redesign of the Brent Spence Bridge Project" and "Response to public comment – Brent Spence Bridge Project and "Response to public comment – Working Cincinnati Westway Design Improvements" in the project record. No BF members were consulted during the review of BF concepts nor during the preparation of the feasibility studies. However, the press releases had been pre-coordinated with the Cincinnati Regional Chamber (see pdf page 107). The BSMT had decided to coordinate design change efforts with the Chamber instead of with BF. The press releases did not explore opportunities to achieve the general goals of the BF vision, but instead assigned undue engineering constraints to the overall concepts presented by BF members (e.g. a 4 th Street overpass over 1-75). The handling of these feasibility studied damaged BF's reputation publicly. It seems this action by the BSMT was designed to limit public engagement – by concerned citizens, businesses, and governments – in support of BF-style visions for the Project.	All comments received from Bridge Forward were considered. Details regarding how those concerns were addressed are provided in the supplemental EA and the <u>Public Involvement Summary</u> . As referenced by the commenter, KYTC and ODOT prepared detailed responses to several of the concepts submitted by Bridge Forward and made them publicly available. Due to public interest in the concepts being put forth by Bridge Forward, the public was notified that responses to comments had been posted on the project website. Representatives from government agencies, community groups, and businesses with vested interests in the project area also provided feedback on the BSB Corridor Project through the Project Advisory Committee. ODOT coordinated with the Cincinnati USA Regional Chamber of Commerce and other members pf the Project Advisory Committee throughout the project's development. KYTC and ODOT will continue to coordinate with the Project Advisory Committee to provide project updates and gather feedback during design and construction of the project.	Public Comments (5.1.1) Local Agency Coordination (5.2)
		B-200-19	03/08/2024 - 18. In response, BF submitted a letter dated 3/4/23 to the FHWA. Included in this letter were rebuttals to the two feasibility studies, pointing out undue assumptions and lack of foundation in conclusions made in the studies. Still, the SEA includes verbatim language from the two feasibility studies under	Responses to the subtopics listed by the commenter are provided below. a. KYTC and ODOT have considered substantial design improvements throughout the project's development, and substantial refinements have been incorporated into Refined Alternative I (Concept I-W). KYTC and ODOT will	Project History (1.2) Alternatives (3.)



ID	Name	No.	Comment	Response	Reference ¹
			 the sections titled Bridge Forward Coalition, Westway Emails, and Refinements Considered and Dismissed (SEA pages 270, 272, and 278- 279). Therefore, we are resubmitting the 3/4/23 letter and its appendices (see pdf pages 16- 166). Within the context of the entire 3/4/23 letter, the following subtopics of that letter should each be considered as individual comments to the SEA, as opinions of BF: a. III/A. The Project's decade-old FONSI has commonly been cited as reason why substantial design improvements cannot be considered. b. III/B. The City of Cincinnati was advised that it could not obtain Project Cooperating Agency status. c. III/C. ODOT released incomplete analyses of Bridge Forward's vision to the press, without first engaging with Bridge Forward. d. III/D. Favored organizations have invited to participate in the project development process, while Bridge Forward and other community groups have intentionally been excluded. e. III/F. November 10, 2022, press conference mischaracterizes the scale recent ODOT-led of design improvements. f. III/F. Timing of the Project's environmental process does not allow for subsequent changes in the Project development process or the Project has been advertised as "set in stone." h. III/H. Outreach to neighborhoods has been inadequate. i. III/J. Foundational EIS and traffic forecasts were disregarded when developing Certified Traffic for the Project. j. III/J. IIJA and Justice40 priorities are not being addressed. 	 continue to consider design refinements during the evaluation of innovation concepts for the Phase III progressive design-build contract. b. The City of Cincinnati does not meet the requirements for a cooperating agency for the BSB Corridor Project because it does not have jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for a major federal action that may significantly affect the quality of the human environment. On May 26, 2023, FHWA issued additional participating agency invitations to local agencies, including the City of Cincinnati, which accepted the invitation. c. ODOT considers all public comments and releases responses to public comments on a monthly basis and at key public involvement milestones (such as the conclusion of the targeted EJ/neighborhood outreach, the open-house project update meetings, and the public hearings). d. KYTC and ODOT have coordinated with representatives from government agencies, community groups, and businesses with vested interests in the project area. These coordinating efforts include the activities of the Project Advisory Committee (PAC). The PAC was formed early in the project development process (during the development of the 2012 EA/FONSI) to better align the project with regional and community needs. The role of the PAC is to review various components of the project and offer feedback to allow the views of the community to be addressed as the project is developed and implemented. The PAC members act as liaisons between their respective organizations and communities and the project team. The PAC also assists with distributing information provided by the project team to their respective community members. All PAC meetings are open to the public, and the public is provided the opportunity to offer comments during each PAC meeting. As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held 	Future Design Refinements (3.7) Traffic (3.8) Disadvantaged Communities (4.1.9) Public and Stakeholder Involvement (5.1) Participating & Cooperating Agencies (5.4)

ID	Name	No.	Comment	Response	Reference ¹
			 k. IV/A. Consider appointing a special project coordinator/liaison of national importance to be heavily involved in the Project. I. IV/B. Launch independent analyses of the items listed herein to help provide the BSMT and the selected DBT with as much useful and timely information as possible. m. IV/C. Include the specific procurement language listed herein in an addendum to the current Request for Proposals (RFP) for a design-build team (DBT). 	 multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. No community groups have been excluded from providing feedback on the BSB Corridor Project. e. The press conference referenced by the commenter was held in conjunction with the City of Cincinnati to announce refinements incorporated into the project to open up approximately 10 acres of land for potential future redevelopment and/or public space. No response to this comment, other than to acknowledge the opinion expressed therein, can be provided. 	
				f. The timing of the project's environmental process has not unduly constrained project development activities. KYTC and ODOT began preparing a supplemental EA in 2021, and the NEPA process is anticipated to conclude in April 2024. Public involvement will continue to occur during the design and construction of the project.	
				g. The project has not been advertised as set in stone. KYTC and ODOT have encouraged public feedback and have incorporated several refinements into Refined Alternative I (Concept I-W) in direct response to comments and feedback that were gathered.	
				h. Opportunities for local communities to offer feedback about the project occurred during 16 targeted EJ/neighborhood outreach meetings in late 2022 and open-house project update meetings in August 2023. All meetings were attended by residents of the targeted neighborhoods. Residents of local neighborhoods were provided the opportunity to review the supplemental EA, attend in-person and virtual public hearings, and provide comments to KYTC and ODOT during the 30-day public availability period. To make sure that all populations were aware of these opportunities, postcards advertising the availability of the supplemental EA and the public hearings were delivered to nearly 50,000 mailboxes in the greater Cincinnati/Northern Kentucky area. Public involvement will continue to occur during the design and construction of the project.	



ID	Name	No.	Comment	Response	Reference ¹
				i. KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the Ohio- Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record.	
				j. KYTC and ODOT evaluated the effects of Refined Alternative I (Concept I-W) on disadvantaged communities to address the priorities of the Infrastructure Investment and Jobs Act and the Justice40 Initiative. The results of the analysis were documented in a <u>Socioeconomic Technical Report</u> (January 2024) and summarized in the supplemental EA.	
				k. Officials and staff at all levels of FHWA, KYTC, and ODOT have been heavily involved in the BSB Corridor Project.	
				I. All comments received from Bridge Forward were considered by qualified ODOT staff and their engineering consultants. Independent analysis was not required. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	
				m. The objectives incorporated into the progressive design-build contract reflect several of the ideas offered by Bridge Forward. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	



ID	Name	No.	Comment	Response	Reference ¹
		B-200-20	03/08/2024 - 19. Still, the BSMT utilized a similar tactic on August 29, 2023, in response to a BF coalition engineer's initial pass at a designed manifestation of the BF vision: releasing a negative feasibility study directly to the press. This is not how a typical, productive, or good-faith design process is conducted. That day, the Cincinnati Enquirer published an article about the feasibility study (see pdf pages 1301-1303). The article concluded with a quote from then-Ohio House Representative Bill Seitz: "The burden would now seem to fall on the Bridge Forward people to come up with the extra money and to answer the issues around constructability." Instead, we ask for the BSMT to work with us in a productive and transparent manner to determine solutions to issues such as constructability. A community group of stakeholders should not be expected to answer for technical questions such as constructability concerns.	As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project and have dedicated the personnel and provided technical expertise necessary to examine and respond to Bridge Forward Concepts. Due to public interest in the concepts being put forth by Bridge Forward, the public was notified when responses to comments were posted on the project website.	Public Comments (5.1.1)
		B-200-21	03/08/2024 - 20. BF disagrees with the assessment in the SEA that two design refinements must be dismissed. The two design refinements are: "Depress I-75 and extend local streets across the highway to form an urban street grid" (SEA page 278) as well as "Cap I-75 through downtown Cincinnati and the West End neighborhood" (SEA page 279). Many of the statements in the SEA justifying such dismissal are overly broad or dependent upon undue design constraints. A thorough examination of this type of hurried conclusion within a feasibility study is provided in the 3/4/23 letter, section III/C (see pdf pages 27- 29) as well as its referenced Exhibits G and H (see pdf pages 119-159). In the case of the SEA, on SEA page 279, it is stated that: "Building a freeway cap by lowering I-75 would	The information provided in the supplemental EA accurately responds to the comments that were received during public involvement activities. During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration. Bridge Forward's latest concepts incorporate an extension of 5 th Street in downtown Cincinnati; therefore, this concept will be evaluated during the innovation period.	Future Design Refinements (3.7) Public Comment Outcomes (5.1.2)



ID	Name	No.	Comment	Response	Reference ¹
			avoid the need for retaining walls [supporting either I-75 or Western or Winchell Avenues]; however, the interstate would need to be lowered by 20 to 30 feet, which would require prohibitively steep grades to meet the geometric constraints of the CSX rail lines." However, in working with Fischer Management and Kaskaskia Engineering, we understand that a local 5 th Street overpass, connecting the east and west sides of the BSBC is indeed feasible. We believe, therefore, there has been insufficient study of design alternatives forming the conclusion of this SEA. And, given the early engagement of our group and the submission of our letter over a year ago, we believe that timeline cannot be a barrier to a transparent, good-faith investigation of design improvements.		
		B-200-22	03/08/2024 - Comments Related to City of Cincinnati and Hamilton County Involvement 21. The BSMT has, for a very long time, touted the fact that "KYTC and ODOT have closely coordinated the project with the City of Cincinnati" (SEA page 273). However, it seems to BF that the BSMT has decided to closely coordinate specifically with the City's Department of Transportation & Engineering ("DOTE"), but not with other relevant areas of City government such as City Council, Community Councils, the Department of City Planning, the Community and Economic Development Department, and the Office of Environment & Sustainability. The Project, having a nearly decade-long construction schedule and costing taxpayers nearly \$4 billion, demands a more holistic partnership with the City. This is critical too, because we have been advised by the BSMT that it is the	ODOT's primary point of contact for transportation projects within the City of Cincinnati has been, and will continue to be, the Cincinnati Department of Transportation and Engineering (DOTE). Through this coordination, KYTC and ODOT have been informed that the Cincinnati DOTE is coordinating with other city departments and providing consolidated feedback on the project to KYTC and ODOT. KYTC and ODOT have considered all input provided by the City of Cincinnati.	Local Agency Coordination (5.2)



ID	Name	No.	Comment	Response	Reference ¹
			City that must speak for the public interest on this Project.		
		B-200-23	03/08/2024 - 22. We do agree that the BSMT leadership and DOTE leadership have coordinated closely (see pdf pages 1333- 1359). However, in the few weeks leading up to the submission of this letter, members of BF have met with multiple City Councilmembers to discuss the BF vision. These City Councilmembers expressed concerns about the BF vision that they say were communicated to them directly by ODOT. These concerns included statements that the BF concept would necessarily "shut down I-75 for a year during construction" and that the BF concept would "cost an extra \$500 million." The Cincinnati Mayor has repeated similar concerns to BF, and he has therefore viewed BF as an annoyance rather than as a coalition of constituents representing the views of Project stakeholders. BF members have received no such warnings of these precise cost or maintenance of traffic concerns from the BSMT. The latest figures we have been provided indicate a cost premium for the BF concept of around \$100M. And, even if these cost and maintenance of traffic concerns are based on initial renderings of the BF concept produced by E volunteers, the BF concept has been advanced by Kaskaskia Engineering and communicated to the BSMT by Fischer Management. We hear from Governor DeWine that the State is awaiting further direction from Council5, but Council has not been honestly kept up to date on the current status of the BF concepts by the BSMT. Additionally, Councilmembers, who are supposed to set the	KYTC and ODOT were not parties to the conversations or impressions referenced by the commenter; therefore, no response, other than to document the comment as received, can be provided. As the commenter points out, ODOT has closely coordinated with the City of Cincinnati. ODOT's primary point of contact for transportation projects within the City of Cincinnati has been, and will continue to be, the Cincinnati DOTE. KYTC and ODOT have considered all input provided by the City of Cincinnati.	Local Agency Coordination (5.2)



ID	Name	No.	Comment	Response	Reference ¹
			policy of the City, should not be expected to make technical engineering trade-off decisions based on incomplete analyses; they should be invited to dictate desired Project outcomes and objectives first, then be updated on implications subsequently.		
		B-200-24	03/08/2024 - 23. DOTE has said that it is relying heavily on its Advisory Committee (distinct from the BSMT's Project Advisory Committee) to receive input on the Project. However, a review of Advisory Committee meeting minutes as well as FOIA requests (see pdf pages 1360-1375) indicate that very little, if any, actionable input is received from the Advisory Committee members and then passed along to the BSMT. No substantial opportunity to influence the process has been afforded to the Advisory Committee members. It seems that only a handful of the 15 Committee members attend each monthly meeting.	The Advisory Committee referenced by the commenter was established by the Cincinnati DOTE and is independent of KYTC and ODOT activities on the BSB Corridor Project. Therefore, no response, other than to document the comment as received, can be provided.	N/A
		B-200-25	03/08/2024 - 24. Similarly, the recommended design change that DOTE released on 10/19/23, adding a one-way frontage road to the east side of I-75 and adding one intersection on the west side of I-75, was positive in that it indicated some degree of design and cost flexibility. It also indicated that DOTE is aware of the BF constituency. However, as far as BF can tell (again based on FOIA requests, see pdf page 1363), there was not a public demand for the 10/19/23 proposal. Also, no members of Council were alerted to this proposal before it was released to the press and to the BSMT, although BF had been presenting at the CE&I multiple times in the weeks leading up to 10/19/23.	The recommended design changes that are referenced by the commenter were submitted as potential innovation concepts for the progressive design-build contract and are being evaluated as part of the innovation period for that contract. KYTC and ODOT were not parties to the activities referenced by the commenter; therefore, no response, other than to document the comment as received, can be provided.	Future Design Refinements (3.7)



ID	Name	No.	Comment	Response	Reference ¹
		B-200-26	03/08/2024 - 25. In neither the SEA nor any of the Pubic Involvement Summary documents is there a mention of the City of Cincinnati's resolution dated May 10, 2023. The resolution is included on pdf pages 1376-1389. Why has this important resolution been excluded entirely? The resolution resolves to: a. "advocate for ODOT to consider additional improvements throughout the existing progressive design-build process that could further reduce the width of the total right-of- way, streamline and reduce the footprint of downtown entry/exit points, improve existing pedestrian and bicycle access and safety, and potentially return additional developable land or greenspaces to public use, including reviewing and considering various innovative concepts submitted to ODOT," and b. "supporting and encouraging efforts to explore the feasibility of additional proposals with the understanding that this once-in-a- century infrastructure project will impact the future of Cincinnati's growth and development for decade to come," and c. "request ODOT report back to Council on the outcome of ODOT's evaluation of the cost, feasibility, and other pertinent considerations of alternative proposals, including that shown on Attachment A," and d. "copies of this resolution be provided to [ODOT], [KYTC], and [FHWA]" In response, has the BMST responded to Council with an evaluation of multiple proposals achieving the aims set forth, as requested? In doing so, we hope it is understood that Council should not expected to provide engineered solutions, only desired outcomes and objectives.	The resolution referenced by the commenter was not received as a public comment on the BSB Corridor Project; therefore, it was not expressly included in the supplemental EA or the <i>Public Involvement Summary</i> . Several objectives incorporated into the progressive design-build contract are in line with the objectives outlined in section a of the resolution. These include building the project with a context sensitive design that fits within the community; maximize the public investment in the project by minimizing the footprint; minimizing the footprint of the interstate system to maximize potential developable space; improve neighborhood connectivity across the interstate; and minimizing physical intrusion and impact. KYTC and ODOT will evaluate innovation concepts submitted by the City of Cincinnati during the innovation period for the progressive design-build contract. The remaining sections of the resolution will be addressed as part of the evaluation of innovation concepts. When innovations are proposed, KYTC and ODOT will share recommendations with key stakeholders such as the City of Cincinnati, the City of Covington, the city of Park Hills, the City of Fort Wright, the City of Fort Mitchell, Hamilton County, and Kenton County and will gather feedback from local agencies that may be affected by any changes. Each local entity will be responsible for soliciting public feedback on innovations as part of their review and comment process.	Future Design Refinements (3.7) Public Comments (5.1.1) Ongoing Public & Stakeholder Coordination (5.6)

BRENT SPENCE

ID	Name	No.	Comment	Response	Reference ¹
		B-200-27	03/08/2024 - 26. Similarly, in neither the SEA nor any of the Pubic Involvement Summary documents is there a mention of the Hamilton County Board of Commissioner's resolution dated June 15, 2023. The resolution is included on pdf pages 1390-1393. Why has this important resolution been excluded entirely? The resolution resolves "support for assessing all options to reclaim additional and for community and economic purposes throughout the BSBC; advocate[s] for improvements throughout the existing progressive design- build process that could further reduce the width of the total needed project right-of-way, streamline and reduce the footprint of downtown entry/exit points, improve existing pedestrian and bicycle access and safety, minimize the impact on the County's air, water, and land resources, especially to the broader sewer and stormwater system, and potentially restore additional developable land or greenspaces for public use. This includes reviewing and considering various innovative concepts submitted to ODOT" In response, has the BMST responded to the Board with an evaluation of multiple proposals achieving the aims set forth, as requested? In doing so, we hope it is understood that Board should not expected to provide engineered solutions, only desired outcomes and objectives.	The resolution referenced by the commenter was provided as a comment during the public comment period for the supplemental EA. As a participating agency for the BSB Corridor Project, the Hamilton County Board of Commissions will receive a formal written response.	Participating & Cooperating Agencies (5.4) Public Hearing (5.5)
		B-200-28	03/08/2024 - Comments Related to Desired Environmental Commitments 27. Bridge Forward believes that groups such as the Sierra Club, the CTSD, and the US EPA have all communicated very serious issues related to the environmental impacts of the Project. Our conclusion is that a net-neutral impact consistent with a FONSI can be achieved if additional environmental	The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA. KYTC, ODOT, and FHWA will consider all comments received during the public comment period prior to FHWA making a final	Introduction (1.) Public Hearing (5.5)



ID	Name	No.	Comment	Response	Reference ¹
			commitments are made before the SEA is approved.	decision on the supplemental EA. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	
		B-200-29	03/08/2024 - 28. Bridge Forward does feel that the public involvement process conducted by the BSMT has been flawed though, for the reasons conveyed above, and therefore, environmental commitments are required at this time, to ensure that future process flaws do not prevent the realization of the net-neutral impact that BF describes herein.	The public involvement for the BSB Corridor Project has been conducted in accordance with the project <i>Public</i> <i>Engagement Plan</i> and applicable federal and state requirements and guidance.	Public and Stakeholder Involvement (5.1)
		B-200-30	03/08/2024 - 29. Bridge Forward enthusiastically accepts the mandate from multiple – likely even a plurality of – public commentors on this Project who have urged the BSMT to "work with BF" or to "use the BF plan." BF does represent those commentors as it relates the environmental commitments proposed herein.	As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have also held multiple working sessions with Bridge Forward to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary</i> . During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration.	Public and Stakeholder Involvement (5.1) Ongoing Public & Stakeholder Involvement (5.6)
		B-200-31	03/08/2024 - 30. Bridge Forward believes the following three design Outcomes, which are feasible per the BF-endorsed Kaskaskia Engineering plans submitted by the Fischer Management Team, must become environmental commitments: a. Realignment of I-75 to reduce interstate and infrastructure footprint, decreasing the width by at least 200 feet compared to alternative I-W; b. Creation of local urban access roads along I- 75, from 3 rd /4 th Street to 9 th Street, using	KYTC and ODOT have incorporated an environmental commitment into the project to evaluate concepts submitted by Bridge Forward during the innovation process for the Phase III progressive design-build contract. The concepts described by the commenter will be evaluated during the innovation process. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	Environmental Commitments (Section 6. and ES-Table II)



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			creative solutions to facilitate traffic flow; and c. Establishment of a local street linking 5 th Street with I-75 access roads on both sides of the highway. Note: a conservative factor of safety has been applied to the quantities in these three Outcomes (e.g. the engineered plans show that the width of the BSBC can in fact be reduced by greater than 200 feet). We have selected these Outcomes because they promise to, in turn: d. Deliver billions of dollars of economic impact as explained in the Karp Strategies study, discussed below; e. Ensure that land returned to the City from the footprint of the existing BSBC is usable and developable, by provision of a local street grid on all sides of the land, ensuring street frontage, pedestrian access, fire truck access, etc; f. Return substantial additional land; g. Remove the BSBC infrastructure barrier and unlock development potential in Queensgate; and h. Reduce walking distance from the CBD to Queensgate, south of 7 th Street (measured from western edge of acreage returned) from approximately 1,500 feet to 500 feet.	Per 23 CFR § 771.109(b)(1), KYTC and ODOT, in cooperation with FHWA, are responsible for implementing mitigation measures stated as commitments in the supplemental EA and the final environmental decision documents unless FHWA approves of their deletion or modification in writing. FHWA will ensure that this is accomplished as a part of its stewardship and oversight responsibilities. KYTC, ODOT, and FHWA have developed a <i>Project</i> <i>Management Plan</i> for the BSB Corridor Project, which will be updated as the project phases advance. Among other items, the <i>Project Management Plan</i> establishes protocols for environmental compliance monitoring. Per the BSB Corridor <i>Project Management Plan</i> , ODOT and KYTC will meet all commitments and project-specific mitigation and enhancement items included in the project's environmental clearance.	

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		B-200-32	 03/08/2024 - 31. Furthermore, these Objectives from the PDB procurement document must be translated to environmental commitments, based on all comments received during the public involvement process and based on continued engagement with Cincinnati City Council, the Hamilton County Board of Commissioners, Sierra Club, CTSD, etc: a. Build a project with a context sensitive design that fits within the community; b. Maximize the public investment in the Project by minimizing the footprint/Minimize the footprint of the interstate system to maximize potential developable space; c. Improve neighborhood connectivity across the interstate; d. Provide strong aesthetic value along the project corridor/Improve local road aesthetics when crossing the interstate; e. Minimize physical intrusion and impact; and f. Design for improved quality of life. 	The objectives listed by the commenter and several other objectives are reflected in existing environmental commitments in the supplemental EA and incorporated into the progressive design-build contract. KYTC and ODOT will conduct a thorough evaluation of innovation concepts before making any final decisions. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	Future Design Refinements (3.7) Environmental Commitments (Section 6. and ES-Table II)
		B-200-33	03/08/2024 - 32. To ensure design flexibility, Scenario Testing must be completed before Certified Traffic is finalized.	The certified traffic for the BSB Corridor Project has been finalized, and the <i>Interchange Modification Study</i> <u>Addendum</u> was approved in December 2023.	Traffic (3.8)
		B-200-34	03/08/2024 - 33. As it relates to the need to provide transit, as related to the communication in the 3/4/23 letter, section III/I (pdf pages 33- 34), BF believes that sacrificial slabs should be installed over and along the BSBC wherever it is reasonably imaginable that the Cincinnati Streetcar or other rail transit may be one day routed.	In consideration of feedback provided by the Cincinnati DOTE, ODOT will design and construct the non-deck components for the new Ezzard Charles Drive bridge over I-75 to not preclude potential future streetcar route expansion. The design modification will not change the footprint or the environmental impacts of the project.	Public Hearing (5.5)
		B-200-35	03/08/2024 – 34. As it relates to greenhouse gas ("GHG") emissions and climate change impacts of the Project, BF believes that (i) by	The evaluation of greenhouse gases and climate change prepared for the supplemental EA followed the guidance issued by the Council on Environmental Quality using	Greenhouse Gases and



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			reducing the BSBC footprint thereby creating the opportunity for dense development in the CBD and (ii) by removing the BSBC infrastructure barrier thereby unlocking the dense development potential in Queensgate, smart growth principles will be advanced through the Project, thereby reducing the need for GHG-intensive suburban sprawl and deforestation. Beyond this, BF believes that the BSMT could commit to procuring exclusively low-emission concrete, thus demonstrating demand for this product and driving innovation for it. Additionally, the Project could be designed & constructed according to the Institute for Sustainable Infrastructure's Envision standard.	methodologies discussed and in consultation with the U.S. Environmental Protection Agency (USEPA). The analysis was conducted at a quantitatively high level using USEPA's MOtor Vehicle Emission Simulator (MOVES). MOVES is USEPA's official model for state implementation plans and transportation conformity analyses and is listed by the U.S. Department of Transportation as the most common approach for modeling greenhouse gas emissions for transportation projects. KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to decrease in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W). In addition, the on-road transportation, including emissions from extraction, transportation, and production of roadway construction can contribute to the total greenhouse gas footprint of on-road transportation, including emissions from extraction, transportation, and production of roadway construction emissions can also	Climate Change (4.7) Construction Impacts (4.11)



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				include greenhouse gas emissions from roadway resurfacing and reconstruction, routine maintenance, and traffic delay resulting from construction activity.	
				Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
				Avoidance, minimization, and mitigation measures incorporated into the project's environmental commitments will help to address greenhouse gas emissions during construction. These measures include developing detailed traffic management, maintenance of traffic, and incident management plans to minimize traffic congestion; requiring ultra-low sulfur diesel fuel for all diesel-powered construction equipment; prohibiting the burning of any materials on the construction site; minimizing idling time for diesel-powered equipment to the greatest extent practicable; and using solar power for digital signs to the greatest extent possible.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined	



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				Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
		B-200-36	03/08/2024 - 35. As it relates to economic justice for local BSBC host communities, we believe that the positive economic impact of the BF vision will be substantial. Please see the attached economic impact study of the BF vision, prepared by Karp Strategies, showing billions of dollars of impact from our vision (see pdf pages 1394-1438). Additionally, a land value capture scheme benefiting the entire Queensgate and West End neighborhoods – much like the TIF districts extending north- south from the CBD to Over-the-Rhine – could possibly be established, ensuring that the developable Queensgate neighborhood as well as the established West End neighborhood both benefit. Additionally, a community land trust could be established for certain real estate in the area of the BSBC.	During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project.	Future Design Refinements (3.7)
		B-200-37	03/08/2024 - 36. We believe the ultimately selected Project design must deliver the best life-cycle value to all stakeholders, consistent with progressive design-build contracting principles. We suggest that the BSMT engage an expert in value-capture schemes to work with Project stakeholders, such as the City of Cincinnati Community and Economic Development Department and The Port, to ensure financing any cost premium associated with desired project outcomes stated above is not an issue.	KYTC and ODOT will be utilizing existing procedures in the development of project cost estimates. Costs will be shared with local governments participating in the cost of the project activities. The funding needed from local governments will need to be identified and provided through the local government practices.	Funding (1.2.1) Cost Estimates (3.6)
		B-200-38	03/08/2024 - 37. On August 28, 2023, ODOT Director Jack Marchbanks stated in a letter: "From an environmental standpoint, ODOT views the Bridge Forward June 2023 concept	Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for Phase III will develop innovation concepts that will be evaluated by KYTC and ODOT.	Future Design Refinements (3.7)



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		B-200-39	as a refinement to the current design, and evaluating this concept is not anticipated to cause a delay." We appreciate these comments, and we believe that a full and transparent design process must be commenced demonstrating to stakeholders, including BF, the exact design options available that achieve BF vision outcomes and objectives. Honesty, transparency, partnership, and a can-do spirit of ingenuity are crucial going forward.	Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. When innovations are proposed, KYTC and ODOT will share recommendations with key stakeholders such as the City of Cincinnati, the City of Covington, the City of Park Hills, the City of Fort Wright, the City of Fort Mitchell, Hamilton County, and Kenton County and will gather feedback from local agencies that may be affected by any changes. Each local entity will be responsible for soliciting public feedback on innovations as part of their review and comment process. When KYTC, ODOT, and FHWA determine that an innovation will be incorporated into the project, the public will be informed of the decision. Information provided to the public will include a description of the innovation, an explanation of the expected benefits, and the rationale for the decision. If an innovation requires additional coordination or reevaluation to meet NEPA requirements, KYTC, ODOT, and FHWA will conduct those activities in accordance with all federal requirements.	
		B-200-39	03/08/2024 - 38. BF regrets that its suggested language for inclusion in the PDB contract, submitted in the 3/4/23 letter, section IV/C (pdf pages 37-38), could not be included in the PDB contract. However, we believe that a fully optimized, transparent, and productive process necessitates commitments consistent with the recommendations of that language, which we hereby include in this comment without repeating it.	Bridge Forward's comments were considered when establishing the design-build contract objectives for the progressive design-build process.	Future Design Refinements (3.7)
		B-200-40	03/08/2024 - 39. The SEA states that "elected officials in the City of Cincinnati will continue to be afforded opportunities to provide feedback on the project" (page 273). We appreciate that	The public comment period for the supplemental EA concluded on March 8, 2024. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the	Public Hearing (5.5) Ongoing Public & Stakeholder



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			the deadline for additional input for Cincinnati City Council, and hopefully the Hamilton County Board of Commissioners as well, is not 3/8/24, especially since Cincinnati Councilmembers must be updated Bridge Forward volunteers on the current opportunities related to the BF vision, as discussed above.	outcome of the comments received during the public availability period for the supplemental EA. KYTC and ODOT will continue to coordinate the project with local stakeholders to address local concerns as the project moves through the detailed design and construction phases.	Involvement (5.6)
		B-200-41	03/08/2024 – 40. Without a doubt, achieving the Outcomes and Objectives with this Project desired by BF and members of the community, discussed above, will require a spirit of ingenuity, and BF stands ready to be supportive.	No response, other than to acknowledge the commenter's sentiments and support, can be provided.	N/A
B-201	Barnett, David	B-201-1	03/08/2024 - Cincinnati should consider every possibility in the development of green spaces through a full public ODOT/EIS review when opportunities arise like thisa pollution corridor where adjacent neighborhood effects are obvious. The fact that the space may attract beneficial but threatened species, bats among others, plus an opportunity to landscape with native thrivable plants is a huge plus in cumulatively facing threats to our environment and neighborhoods.	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act (NEPA) reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. These include a new <u>Quantitative MSAT Analysis Report</u> (August 2023), a new emissions burdens analysis, updated threatened or endangered species studies and coordination, updated terrestrial habitat assessment, and an updated cumulative effects assessment, among others.	Introduction (1.) Social and Economic Resources (4.1) Terrestrial Habitat (4.2.3) Threatened or Endangered Species (4.2.4) Air Quality (4.6) Cumulative Effects (4.10.2)

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				The supplemental EA evaluates the project's potential direct, indirect, and cumulative effects on all residents within the project area, including, but not limited to, surrounding neighborhoods, minorities, low-income individuals, older adults, individuals with limited English proficiency, zero-car households, adults with disabilities, and children. In addition, environmental commitments have been incorporated into the project to minimize and mitigate unavoidable impacts and to provide additional enhancements for local communities.	
				The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	
				Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Refined Alternative I (Concept I-W) incorporates measures to avoid, minimize, and mitigate impacts to green spaces in the project area. The project will avoid green spaces surrounding the Firefighters Memorial in Cincinnati. The project was refined to avoid tree removal in the portions of Ezzard Charles Park that are located in existing tree lawns. As part of the mitigation measures for the Goebel Park Complex in Kentucky, KYTC is providing \$100,000 to the City of Covington for the development of a new Goebel Park Master Plan. The new Master Plan will document the future plans, uses, and location of facilities in the Goebel Park Complex, including green spaces. In addition, KYTC and ODOT have worked to incorporate several	



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				enhancements to further benefit surrounding communities and potentially provide additional green space. Refined Alternative I (Concept I-W) reconfigures the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati. ODOT has also committed to building an additional 50 feet of green space on each side of the Ezzard Charles Drive bridge over I-75 that could support potential future civic space or retail development by the City of Cincinnati.	
				Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build objectives, and have support at the local level may be incorporated into the project. Some of the design-build objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; building the project with a context sensitive design that fits within the community; create best environmental outcomes; and design for sustained quality of life.	
B-202	Northern Kentucky Sierra Club Group	B-202-1	03/08/2024 - It is a known fact that fossil fuel- powered engines in our automobiles and trucks are one of the primary contributors to environmental pollution. Emissions from combustion engines are released into the air while volatile organic chemicals and heavy metals are deposited onto the roadways which end up polluting soils and waterways due to stormwater runoff. These pollutants contribute to greenhouse gas (GHG) formation, smog and more polluted rivers and ground water. Pollution issues are particularly exaggerated in	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire Brent Spence Bridge (BSB) Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio Traffic Forecasting Manual, and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <u>Interchange</u> <u>Modification Study Addendum</u> (December 2023), and the	Purpose and Need (2.) Traffic (3.8) Travel Patterns and Access (4.1.4)



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	urban areas where there are many highways and the traffic burden is especially heavy.	methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
	 When the Brent Spence Bridge was built in 1963, it was designed to carry 80,000 vehicles per day. Currently, the amount of traffic that crosses the BSB is more than double that amount. This leads to significant traffic congestion due to the convergence of 2 major interstates (1-71 and 1-75), steadily increasing traffic burden and an absence of emergency lanes to clear accidents. The outdated structure of the BSB causes daily traffic backups from Florence, KY to Mitchell Avenue in Cincinnati, OH and beyond. The amount of traffic-related air pollution (TRAP) that is produced daily is not only from the normal flow of traffic, but also from the stop and go/idling traffic when combustion engines produce substantially more pollution per mile than they do at normal highway speeds. Daily TRAP in/around the Brent Spence Bridge places our local population at an increased risk of poor health outcomes and the polluted stormwater runoff impacts our natural environment, including the Ohio River, a major source of aquatic life and drinking water. There is an urgent need to fix the BSB traffic problem. In 1991, the Intermodal Surface Transportation Efficiency Act (ISTEA) was signed into law. The chief goal of this legislation was to develop a "National Intermodal Transportation System that is economically efficient and environmentally sound, provides the foundation for the nation to compete in the global economy, and will move people and goods in an energy-efficient manner". The intermodal approach promoted limiting new roads and road-widenings in order to reduce driving, 	When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods. Refined Alternative I (Concept I-W) will reduce bottlenecks by regional and national transportation corridors. Refined Alternative I (Concept I-W) will reduce bottlenecks by reducing congestion and improving traffic operations throughout the project area. Refined Alternative I (Concept I-W) will reduce bottlenecks by reducing congestion and improving traffic operations throughout the project area. Refined Alternative I (Concept I-W) will reduce bottlenecks by reducing congestion and improving traffic operations throughout the project area. Refined Alternative I (Concept I-W) will also help to provide lane continuity, particularly where it will tie into the Mill Creek Expressway Project to the north and I-71 to the east. In addition, Refined Alternative I (Concept I-W) will rebuild every interchange within the project area, which will help to improve traffic flow on entrance and exit ramps. In 2004, OKI and the Miami Valley Regional Planning commission (MVRPC) completed a major planning study	
	No.	 urban areas where there are many highways and the traffic burden is especially heavy. When the Brent Spence Bridge was built in 1963, it was designed to carry 80,000 vehicles per day. Currently, the amount of traffic that crosses the BSB is more than double that amount. This leads to significant traffic congestion due to the convergence of 2 major interstates (1-71 and 1-75), steadily increasing traffic burden and an absence of emergency lanes to clear accidents. The outdated structure of the BSB causes daily traffic backups from Florence, KY to Mitchell Avenue in Cincinnati, OH and beyond. The amount of traffic-related air pollution (TRAP) that is produced daily is not only from the normal flow of traffic, but also from the stop and go/idling traffic when combustion engines produce substantially more pollution per mile than they do at normal highway speeds. Daily TRAP in/around the Brent Spence Bridge places our local population at an increased risk of poor health outcomes and the polluted stormwater runoff impacts our natural environment, including the Ohio River, a major source of aquatic life and drinking water. There is an urgent need to fix the BSB traffic problem. In 1991, the Intermodal Surface Transportation Efficiency Act (ISTEA) was signed into law. The chief goal of this legislation was to develop a "National Intermodal Transportation System that is economically efficient and environmentally sound, provides the foundation for the nation to compete in the global economy, and will move people and goods in an energy-efficient manner". The intermodal approach promoted limiting new roads and 	 urban areas where there are many highways and the traffic burden is especially heavy. When the Brent Spence Bridge was built in 1963, it was designed to carry 80,000 vehicles per day. Currently, the amount of traffic that amount. This leads to significant traffic congestion due to the convergence of 2 major interstates (1-71 and 1-75), steadly increasing traffic burden and an absence of emergency lanes to clear accidents. The outdated structure of the BSB causes daily traffic backups from Florence, KY to Mitchell Avenue in Cincinnati, OH and beyond. The amount of traffic that also sence of an gooding traffic when combustion engines produce substantially more pollution per mile than they do at normal highway speeds. Daily TRAP in/around the Brent Spence Bridge places our local population at an increased Bit aftor to pollation at an increased Bit aftor by the use of a caudic dirking water. There is an urgent need to fix the BSB traffic problem. In 1991, the Intermodal Surface Transportation for all project area. Refined Alternative I (Concept I-W) will reduce durips) through the year 2049, with a few minor exceptions during peak travel periods. Refined Alternative I (Concept I-W) will reduce durips). The chief goal of this legislation was to develop a "National Intermodal Transportation System that is economically efficient and environmentally sound, provides the foundaria of consportation corridors. Refined Alternative I (Concept I-W) will also help to provide lane continuity, particulary where it that is economically efficient and environmentally sound, provides the foundaria of transportation for the nation to compete in the global economy, and will move popele and good in an energy-efficient maner". The intermodal approach promoted limiting new roads and roads and rampore traffic flow on enrance and exit transp.

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	highways are build or extra lanes more drivers often drive on roads have avoided before because of the traffic. This supports the induced of theory - adding more lanes reduce congestion in the short term but u draws more cars onto the highway the same congestion issues. More environmentally friendly traffic solu- fixing bottlenecks, remove lane re improving on and off ramp traffic for promoting ridesharing by creating during high traffic periods and incu- transportation options. If we wish pollution and GHG emissions, 199 we need to make better use of the		highways are build or extra lanes are added, more drivers often drive on roads they might have avoided before because of too much traffic. This supports the induced demand theory - adding more lanes reduces traffic congestion in the short term but ultimately draws more cars onto the highways, leading to the same congestion issues. More environmentally friendly traffic solutions include fixing bottlenecks, remove lane reductions, improving on and off ramp traffic flow, promoting ridesharing by creating HOV lanes during high traffic periods and increasing public transportation options. If we wish to reduce pollution and GHG emissions, 1991 ISTEA said we need to make better use of the road space we already have. We need to travel smarter.	 (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, high-occupancy vehicle (HOV) lanes, and others. The Initiative concluded that, given the amount of traffic in the corridor in the future, any additional lanes on the interstate mainline would be better utilized as general purpose lanes. The Initiative also concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, neither HOV lanes nor expanded transit would meet the project purpose and need, and they are not considered to be reasonable alternatives for the BSB Corridor Project. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment (EA). Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access. 	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-202-2	03/08/2024 - We acknowledge the need for the BSB to be renovated. We appreciate the attempt to minimize the footprint and environmental impact of the project by highlighting Refined Alternative I (Concept I- W). However, there will still be environmental impacts with decreased air quality, increased greenhouse gas emissions and increased	Air quality studies prepared for Refined Alternative I (Concept I-W) utilized 2020 existing, 2050 no-build, and 2050 build traffic forecasts that were developed using the OKI travel demand model of record. The OKI travel demand model of record was also used to develop the certified traffic projections that were used for the traffic operational analyses for the project. The air quality studies concluded that Refined Alternative I (Concept I-W)	Air Quality (4.6) Greenhouse Gases and Climate Change (4.7) Utilities (4.12.1)



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			stormwater runoff due to increased traffic volume.	is not anticipated to further degrade, and may improve, overall air quality in the project area.	
				KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic.	
				Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				Refined Alternative I (Concept I-W) incorporates measures that will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	



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				Refined Alternative I (Concept I-W) will separate all interstate stormwater runoff in the project corridor from existing combined sewer systems in both Kentucky and Ohio. KYTC has also committed to implementing measures to address surcharging in the Peaselburg neighborhood in Kentucky. ODOT will also include best management practices for water quality treatment in Ohio.	
		B-202-3	03/08/2024 - Additionally, the loss of 2.38 acres of Kentucky wetlands and 74.20 acres of Kentucky terrestrial habitat will affect local wildlife including specific bat populations, mussels, and other native species. Contribution to the Imperiled Bat Conservation fund is not a solution for managing the disruption to the bat population around the BSB. There is no description in the Environmental Assessment of mitigations if nesting peregrine falcons are found on the existing BSB.	Permanent wetland impacts will be mitigated via the KYTC Bath County/Ova Arnett advanced mitigation site or the Kentucky Department of Fish and Wildlife Resources in-lieu fee mitigation program. Permanent stream impacts, including impacts to the Ohio River, will be mitigated via the Licking River Mitigation Bank. Refined Alternative I (Concept I-W) will also implement best management practices for sediment and erosion control to further protect wetlands and streams. Environmental commitments have been incorporated into the project to minimize and mitigate the effects on the Indiana bat, gray bat, the northern long-eared bat, little brown bat, and tricolored bat. Ohio and Kentucky follow separate policies, programmatic agreements, and regulations concerning these species; therefore, each state will incorporate separate minimization and mitigation measures. In Kentucky, the mitigation measures include providing a contribution to the Imperiled Bat Conservation Fund, which will offset project-related impacts to terrestrial habitats by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts. Tree removal in Kentucky will be minimized, and no tree removal will occur from June 1 to July 31 when federally listed bats may be using those habitats. In addition, measures to protect stream areas in Kentucky will be implemented both during and after construction. In Ohio, the mitigation measures include avoiding tree removal in excess of what is required to implement the	Wetlands (4.2.1) Streams and Rivers (4.2.2) Threatened or Endangered Species (4.2.4)



ID	Name	No.	Comment	Response	Reference ¹
				project safely. No tree removal in Ohio will occur from April 1 through September 30, when federally and state listed bats may be using those habitats. Ohio standards and specifications related to lighting; dust control; and water quality, wetland, and stream protection will also minimize and mitigate effects to federally and state listed bat species.	
				Environmental commitments incorporated into the project include mussel salvage (relocation) within areas of direct impact and appropriate salvage zone buffers that will be conducted per the <i>Ohio Mussel Survey Protocol</i> .	
				No peregrine activity had been observed on the existing BSB in 2021 or 2022. KYTC and ODOT have committed to coordinating with the Kentucky Department of Fish and Wildlife Resources in the spring prior to the rehabilitation of the existing BSB or the demolition of the bridge approaches to address potential nesting of peregrine falcons. If nesting peregrine falcons are found, appropriate measures will be developed in conjunction with the Kentucky Department of Fish and Wildlife.	
		B-202-4	03/08/2024 - There is no description of the best management practices that will be used for managing sediment and erosion control.	Best management practices for sediment and erosion control will be finalized during the project's detailed design phase. Erosion and sediment control will be managed according to the requirements of KYTC's <i>Standard</i> <i>Specifications</i> and ODOT's <i>Construction and Material</i> <i>Specifications</i> , including ODOT's Supplemental Specification 832 Temporary Sediment and Erosion Control. KYTC and ODOT will also manage erosion and sediment control through each state's permitting process for the National Pollutant Discharge Elimination System. Best management practices will also be in accordance with the most current versions of KYTC's Highway Design Guidance Manual and ODOT's Location and Design Manual, Volume 2.	Construction Impacts (4.11) Utilities (4.12.1)



ID	Name	No.	Comment	Response	Reference ¹
		B-202-5	03/08/2024 - Air quality will be impacted both during construction and long-term. There are no details in the EA on what the air quality monitoring programs or mitigation strategies will be when air quality is deemed to be poor.	The air quality studies concluded that Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area. Temporary dust and air quality impacts are anticipated during construction. To mitigate these effects, KYTC and ODOT will develop and implement a dust control plan and other measures to minimize and prevent discharge of dust in the atmosphere. During construction, measures will also be implemented to minimize diesel emissions and to protect sensitive receptors from impacts of diesel exhaust fumes. During construction, KYTC and ODOT will develop and implement an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals. As described in Section 4.11.7 of the supplemental EA, the program will monitor levels of particulate matter that is 2.5 micrometers or less in diameter (PM2.5), nitrogen dioxide, and carbon monoxide during construction activities. If the data show that air quality levels are approaching a concern level that may result in an exceedance of the 24-hour National Ambient Air Quality Standard (NAAQS) for PM2.5, the 1-hour NAAQS for nitrogen dioxide, or the 8-hour NAAQS for carbon monoxide, then project-related operational and/or mechanical deficiencies will be identified and corrected, as required, if they are determined to be contributing factors. If the data result in any air quality levels that exceed the above-stated NAAQS for PM2.5, nitrogen dioxide, or carbon monoxide that are caused by project-related emissions, then the applicable construction activities will be suspended until the deficiencies are identified and corrected. Additional details related to the ambient air quality monitoring program will be determined during detailed design, including locations, times, and durations of air quality monitoring; protocols to address any exceedances of the NAAQS should they be	Air Quality (4.6) Construction Impacts (4.11)



ID	Name	No.	Comment	Response	Reference ¹
				observed; and how monitoring and enforcement data will be made available to the public.	
		B-202-6	03/08/2024 - We also must question the necessity for such a large scale for the Brent Spence Bridge Corridor Project as currently proposed, covering 8 miles of interstate highway instead of more limited highway milage each side of the bridge in addition to the bridge itself. The larger the project scale, the greater we expect the negative environmental impacts during construction. While most citizens are likely well aware of the necessity of upgrading the bridge itself and that highways each side will need significant modifications to accommodate that, most are likely unaware that the proposed project will include expansion and modification of 8 miles of the interstate highway. In Kentucky the expansions and modifications are planned all the way to the Dixie Highway interchange, far from the Brent Spence Bridge itself.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. An <u>Interchange Modification Study Addendum</u> used the updated traffic projections to vet and confirm the number of lanes on the interstate, ramps, collector-distributor roadways, frontage roads, and local street intersections in the project area. The <u>Interchange Modification Study</u> <u>Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area through the year 2049, with a few minor exceptions during peak travel periods. Details about the entire 7.8-mile BSB Corridor Project have been provided in public involvement activities throughout the project's development, including in targeted neighborhood outreach meetings held in Fort Wright and Fort Mitchell in Kentucky. Information about the entire 7.8-mile BSB Corridor Project is also provided on the project website: <u>www.brentspencebridgecorridor.com</u> . Public involvement for the BSB Corridor Project is documented in the <u>Public Involvement Summary</u> (January 2024).	Purpose and Need (2.) Traffic (3.8) Public and Stakeholder Involvement (5.1)
		B-202-7	 03/08/2024 - We support a BSB project that improves the traffic situation AND the conditions of our local environment. So we request that: A study to estimate the anticipated increased volume of traffic be done, based on what we 	Certified traffic projections for the BSB Corridor Project were prepared according to the most current state and federal requirements, guidelines, and practices. The <u>Interchange Modification Study Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips (including induced trips) in the project area through the	Traffic (3.8)



ID	Name	No.	Comment	Response	Reference ¹
			assumed and learned from the 1991 ISTEA legislation	year 2049, with a few minor exceptions during peak travel periods.	
		B-202-8	03/08/2024 - • A full Environmental Impact Statement (EIS) be prepared and	The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in Title 40 of the Code of Federal Regulations (CFR) section 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final National Environmental Policy Act determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	Introduction (1.)
		B-202-9	03/08/2024 - • Full details of best management practices be disclosed.	Best management practices for sediment and erosion control will be finalized during the project's detailed design phase and according to the requirements of KYTC's <i>Highway Design Guidance Manual</i> and <i>Standard</i> <i>Specifications</i> and ODOT's <i>Construction and Material</i> <i>Specifications</i> , Supplemental Specifications, and <i>Location</i> <i>and Design Manual</i> . Best management practices will also be finalized through each state's permitting process for the National Pollutant Discharge Elimination System.	Ecological Resources (4.2) Construction Impacts (4.11) Utilities (4.12.1)
B-203	203 Wendel, Richard B-203-1 03/08/2024 - ODOT should conduct a full Environmental Impact Statement. The previous assessment is out of date, and doesn't reflect the true environmental impact.		Environmental Impact Statement. The previous assessment is out of date, and doesn't reflect	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act (NEPA) reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included	Introduction (1.)



ID	Name	No.	Comment	Response	Reference ¹
				in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	
				The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	
		B-203-2	03/08/2024 - It simply does not make sense that by widening the highway, the environmental impact will not be significant. There will be more cars, more trucks, and the environment will suffer as a consequence - both from CO2 emissions, and from particulate matter. This will make air quality worse in the Cincinnati area.	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic. Greenhouse gas emissions (also called carbon dioxide equivalent emissions) were calculated from projected carbon dioxide, nitrous oxide, and methane gas emissions weighted according to the global warming potential of each gas as defined by USEPA in MOVES.	Particulate Matter (4.6.3) Emissions Burdens Analysis (4.6.5) Greenhouse Gases and Climate Change (4.7)
				Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle	



ID	Name	No.	Comment	Response	Reference ¹
				miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
				The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for particulate matter that is 2.5 micrometers or less in diameter (PM2.5). As such, PM2.5 conformity requirements do not apply, and additional PM2.5 analysis is not required for Refined Alternative I (Concept I-W).	
				To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no- build, and 2050 build scenarios. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the study area are expected to be	



ID	Name	No.	Comment	Response	Reference ¹
				less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenarios is not considered to be significant.	
		B-203-3	03/08/2024 - There are so many better ways that could be pursued to address the perceived traffic issue. Either congestion pricing (tolling) or improved public transportation. Both are more much more sustainable, and can be accomplished without 8+ years of construction.	The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. The Brent Spence Bridge (BSB) Corridor Project does not include congestion pricing because it is a form of tolling and is therefore prohibited in Kentucky. In 2004, the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation</u> <u>Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative also concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project. The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental Environmental Assessment. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	Funding (1.2.1) Purpose and Need (2.) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-203-4	03/08/2024 - At the very least, the damage from the highway must be mitigated. On the Cincinnati side, so much land is consumed in the I-75 interchange. This needs to minimized, and connections over to Queensgate/the west end following the existing street grid need to happen. This would open up Cincinnati for more development and economic opportunity - a goal ODOT ought to care about - along with minimizing the environmental impact (the footprint) of the highway. This is a very expensive project. We must get it right.	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. All existing local street connections across I-71/I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Refined Alternative I (Concept I-W) incorporates several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land formerly occupied by the dunnhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge. In addition, ODOT has worked with the City of Cincinnati to incorporate several enhancements to provide additional community benefits, such as reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; incorporating aesthetic treatments throughout the corridor, and providing new and improved pedestrian and bicycle infrastructure will	Purpose and Need (2.) Additional Refinements (3.3) Future Design Refinements (3.7) Travel Patterns and Access (4.1.4) Public Comments (5.1.1)



ID	Name	No.	Comment	Response	Reference ¹
				improve access in and between the neighborhoods in the project area.	
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; minimizing the footprint of the interstate system to maximize potential developable space; improving neighborhood connectivity across the interstate; building the project with a context sensitive design that fits within the community; and creating best environmental outcomes.	
B-204	Robinson, Jody	B-204-1	03/08/2024 - I don't believe the findings of the January 2024 Supplemental Environmental Assessment adequately determine that this project does not have significant impacts on the human and natural environments, so I am requesting a full and transparent Environmental Impact Statement be undertaken. All of this is in addition to questioning why our community's health and vitality has to suffer from pass- through traffic through the heart of our cities, furthering the divide caused by the creation of the highways and their continual expansion.	The analysis documented in the supplemental Environmental Assessment (EA) has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in Title 40 of the Code of Federal Regulations (CFR) section 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final National Environmental Policy Act (NEPA) determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	Introduction (1.)



ID	Name	No.	Comment	Response	Reference ¹
		B-204-2	03/08/2024 - ODOT's own marketing names the Brent Spence corridor as one of the worst trucking bottlenecks in the country, while the FHWA's latest report rated it 54 and the trucking industry's lobby group at 15. I am concerned that public perception and not the fact is driving the overbuilding of the corridor at taxpayers and Cincinnatian's expense with limited ability to maintain the infrastructure we already have.	The Brent Spence Bridge (BSB) corridor forms a critical freight route connecting Canada to Florida, carrying more than \$1 billion of freight every day and more than \$400 billion of freight every year. Traffic congestion continues to hamper freight movement throughout the BSB corridor as evidenced by its ranking at 15 on the American Transportation Research Institute's list of the nation's top truck bottlenecks for the year 2023. KYTC and ODOT will be responsible for maintaining the project after work is completed. Maintenance will be part of ODOT's and KYTC's normal operating procedures, and funding will be set aside as part of each state's budgetary process. In addition, ODOT and KYTC have established <i>Transportation Asset Management Plans</i> that describe how each state manages its assets. The maintenance of the BSB Corridor Project will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	Project Description (1.1) Funding (1.2.1)
		B-204-3	 03/08/2024 - We have been left to question multiple issues: [Note: The commenter's list of issues has been reordered and grouped to facilitate an efficient response. All issues listed by the commenter are included with corresponding responses.] lack of including transit lack of options other than massive lane additions lack of consideration of congestion tolling and/or use of the I-275 beltway that was used in the past for trucks to bypass the bridge corridor 	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. The Kentucky General Assembly passed legislation in April 2015 that prohibited the authorization of tolls for any project involving the interstate highway system that connects the Commonwealth of Kentucky with the State of Ohio. The BSB Corridor Project does not include congestion pricing because it is a form of tolling and is therefore prohibited in Kentucky. In 2005, KYTC and ODOT conducted a <u>Feasibility and Constructability Study of the Replacement/Rehabilitation of the Brent Spence Bridge</u> . Among other considerations, the study evaluated the impacts and costs of prohibiting all through trucks on the existing BSB. The study concluded that the issue of diverting trucks from the existing BSB has regional implications in terms of	Purpose and Need (2.) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
				increased traffic on a number of travel corridors, and such prohibitions would increase costs to the users.	
				In 2007, and as part of a separate study, the Ohio- Kentucky-Indiana Regional Council of Governments (OKI), the Metropolitan Planning Organization (MPO) for the area, completed a <u>Brent Spence Bridge Truck Ban</u> <u>Analysis</u> . A ban on through trucks on the northern Kentucky portion of I-71/I-75 was found to have no substantial benefits. The volumes of diverted traffic were relatively small compared to the overall volume, and the impact on severe crashes within the system was minor. Furthermore, operating costs to the trucking industry would negatively impact the region. The deployment of a truck ban would also present difficulties in terms of enforcement. Therefore, diverting truck traffic would not be effective and is not considered to be a reasonable alternative for the BSB Corridor Project.	
				In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <u>North South Transportation Initiative</u> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative also concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, expanded transit would not meet the project purpose and need and is not considered to be a reasonable alternative for the BSB Corridor Project.	
				The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental EA. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	



ID	Name	No.	Comment	Response	Reference ¹
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
		B-204-4	03/08/2024 - • a record of inaccurate traffic projections • induce demand • recognizing induced demand • overbuilding highways encourages costly sprawl	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT, KYTC, and OKI. Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019.	Traffic (3.8)
				KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049 certified traffic projections were used to prepare an <i>Interchange Modification Study Addendum</i> (<i>December</i> <i>2023</i>), and the methodology for developing the certified traffic projections is detailed in Appendix E of that report.	
				When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase traffic volumes in the BSB corridor. Some of that increase is due to travelers shifting trips they were already making	



ID	Name	No.	Comment	Response	Reference ¹
				from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips).	
				The <u>Interchange Modification Study Addendum</u> used the updated traffic projections to vet and confirm the number of lanes on the interstate, ramps, collector-distributor roadways, frontage roads, and local street intersections in the project area. The <u>Interchange Modification Study</u> <u>Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
				Traffic projections prepared during the preparation of the 2012 EA estimated that 197,000 vehicles per day would travel across the existing BSB by the year 2035 under the no-build scenario. The current certified traffic projections estimate a slightly lower volume of 183,000 vehicles per day by the year 2049, also under the no-build scenario. This decrease is due to lower existing traffic volumes in the corridor and lower expected rates of population and employment growth in the OKI region.	
		B-204-5	03/08/2024 - • the ability for the cities of Cincinnati and Covington's west sides to be an integrated and prosperous part of the community	Environmental commitments have been incorporated into the project to minimize and mitigate unavoidable impacts and to provide additional enhancements for local communities. As a result, Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	Future Design Refinements (3.7) Neighborhood and Community Cohesion (4.1.2)
				Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract	



ID	Name	No.	Comment	Response	Reference ¹
				objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximizing public investment by minimizing the project footprint; improving neighborhood connectivity across the interstate; minimizing physical intrusion and impact; building the project with a context sensitive design that fits within the community; creating best environmental outcomes; and designing for sustained quality of life.	
		B-204-6	 03/08/2024 - • furthering of racial, ethnic, and wealth disparities • correcting prior discriminatory harms • environmental justice impacts on minorities and lower-income residents • health disparities 	An <u>Environmental Justice Analysis Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The environmental justice (EJ) analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on EJ populations:	Environmental Justice (4.1.7) Cumulative Effects (4.10.2)
				 No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; 	
				- No adverse indirect and cumulative effects;	
				 No disproportionately high and adverse relocation, noise, or temporary construction effects; and 	
				- Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood.	
				Refined Alternative I (Concept I-W) was evaluated for cumulative effects specific to EJ populations. Refined Alternative I (Concept I-W) will result in a minor contribution to cumulative residential and commercial displacements and a cumulative loss of parkland and	



ID	Name	No.	Comment	Response	Reference ¹
				historic resources in these communities. These minor cumulative effects will be experienced by all populations and communities, including EJ populations and non-EJ populations.	
				Cincinnati's West End, now partitioned into the Queensgate and West End neighborhoods, is an area with known EJ populations that was historically impacted by urban renewal plans that were common in the United States in the mid-twentieth century. Refined Alternative I (Concept I-W) requires one commercial relocation (a small printing shop) in the West End neighborhood. In addition, the footprint of Refined Alternative I (Concept I-W) has been reduced and requires only minor amounts of strip right-of-way in the West End neighborhood. Refined Alternative I (Concept I-W) will not add to or exacerbate any adverse effects in the West End community from prior actions or events. In recognition of the history of City-sponsored urban renewal and the original Mill Creek Expressway (I-75) construction and as an enhancement in the West End neighborhood, ODOT will work with the City of Cincinnati, which includes the West End Community Council, to develop content for an interpretive display describing the West End community in relation to historic City urban renewal and the Millcreek Expressway construction and to identify a location in proximity to the I-75 corridor to install the display.	
				Refined Alternative I (Concept I-W) will improve community cohesion; improve traffic flow and safety for all modes of travel; improve air quality; abate noise; reduce flooding and combined sewer overflows; improve aesthetics; and provide additional economic opportunities, which will help to offset any cumulative effects from past, present, and reasonably foreseeable actions. Therefore, no adverse cumulative effects on EJ populations are expected to occur as a result of Refined Alternative I (Concept I-W).	



ID	Name	No.	Comment	Response	Reference ¹
		B-204-7	03/08/2024 - • natural habitats of endangered species	The removal of up to 90 acres of forested habitat will result in the loss of potential foraging or maternity areas for the Indiana bat, the northern long-eared bat, and the tricolored bat. The removal of up to 4.38 acres of riparian habitat will result in the loss of potential foraging areas for the gray bat. Construction in the Ohio River will impact habitat for state listed mussel species.	Threatened or Endangered Species (4.2.4)
				Environmental commitments have been incorporated into the project to minimize and mitigate the effects on threatened or endangered species. Ohio and Kentucky follow separate policies, programmatic agreements, and regulations concerning these species; therefore, each state will incorporate separate minimization and mitigation measures for the Indiana bat, gray bat, the northern long- eared bat, little brown bat, and tricolored bat.	
				In Kentucky, the mitigation measures include providing a contribution to the Imperiled Bat Conservation Fund, which will offset project-related impacts to terrestrial habitats by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts. Tree removal in Kentucky will be minimized, and no tree removal will occur from June 1 to July 31 when federally listed bats may be using those habitats. In addition, measures to protect stream areas in Kentucky will be implemented both during and after construction.	
				In Ohio, the mitigation measures include avoiding tree removal in excess of what is required to implement the project safely. No tree removal in Ohio will occur from April 1 through September 30, when federally and state listed bats may be using those habitats. Ohio standards and specifications related to lighting; dust control; and water quality, wetland, and stream protection will also minimize and mitigate effects to federally and state listed bat species.	
				Environmental commitments incorporated into the project include mussel salvage (relocation) within areas of direct	



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				impact and appropriate salvage zone buffers that will be conducted per the <i>Ohio Mussel Survey Protocol</i> .	
		B-204-8	 03/08/2024 - • potential level of greenhouse gas emissions and other particulates • protecting public health while we are already experiencing standards above EPA-acceptable levels • meeting climate change goals 	KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions analysis was conducted at a quantitatively high level using the U.S. Environmental Protection Agency's (USEPA's) MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic.	Air Quality (4.6) Greenhouse Gases and Climate Change (4.7)
				Greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to be 0.7 percent greater when the 2050 build condition is compared to the 2050 no-build condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change.	
				Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined	



ID	Name	No.	Comment	Response	Reference ¹
				Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan.</i>	
				Air quality studies prepared for Refined Alternative I (Concept I-W) utilized 2020 existing, 2050 no-build, and 2050 build traffic forecasts that were developed using the OKI travel demand model of record. The OKI travel demand model of record was also used to develop the certified traffic projections that were used for the traffic operational analyses for the project. The air quality studies concluded that Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in the project area.	
		B-204-9	03/08/2024 - • noise pollution	KYTC and ODOT evaluated noise for Refined Alternative I (Concept I-W) in accordance with their respective state noise policies. As a result of those studies, KYTC is proposing seven noise barriers to mitigate noise impacts in Kentucky, and ODOT is proposing five noise barriers to mitigate noise impacts in Ohio. Recognizing from neighborhood outreach efforts that traffic noise is a primary concern of area residents, KYTC conducted technical studies to evaluate additional noise/visual screening barriers where noise impacts were predicted but noise barriers were not warranted. Based on the technical feasibility and public comments received during outreach activities, KYTC is proposing two additional noise/visual screening barriers in Kentucky.	Noise (4.8)
				In accordance with the KYTC <i>Noise Analysis and</i> <i>Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from proposed noise barriers and noise/visual screening barriers during the detailed design phase of the BSB Corridor Project. In accordance with the ODOT <i>Analysis and Abatement of Highway Traffic Noise</i> <i>Policy Statement</i> , ODOT will conduct noise abatement public involvement with property owners and tenants who would benefit from proposed noise barriers in Ohio during the detailed design phases of the project.	



ID	Name	No.	Comment	Response	Reference ¹
		B-204-10	03/08/2024 - • construction related impacts	Refined Alternative I (Concept I-W) is expected to result in temporary impacts for all transportation modes due to increased traffic on local roads, access restrictions, and detours. It is also expected to result in temporary utility impacts, air quality effects, noise increases, and erosion and sediment increases. Temporary economic and employment benefits are expected due to construction job creation and increased sale of construction-related supplies and services. Temporary construction impacts will be minimized and mitigated to the greatest extent practicable through the development of traffic management, maintenance of traffic, and incident management plans; coordination with local cities, transit agencies, and the regional incident management task force; notifications/outreach to public and trucking companies; and implementation of a dust control plan, measures to monitor and protect air quality, manage construction noise, and best management practices for erosion and sediment control. During construction, a project website will provide regular project updates regarding maintenance of traffic plans, current traffic patterns, upcoming changes, etc. Information about construction schedules will also be shared with the public through social media, e-newsletters, local media, presentations to local groups, and virtual project updates. A complete list of the environmental commitments incorporated into the project to minimize and mitigate temporary construction impacts is provided in Section 4.11.7 of the supplemental EA.	Construction Impacts (4.11)
		B-204-11	03/08/2024 - • storm-water runoff • impact of dramatically more pavement	Refined Alternative I (Concept I-W) will separate all interstate stormwater runoff in the project corridor from existing combined sewer systems in both Kentucky and Ohio. KYTC has also committed to implementing measures to address surcharging in the Peaselburg neighborhood in Kentucky. ODOT will also include best management practices for water quality treatment in Ohio.	Utilities (4.12.1)



ID	Name	No.	Comment	Response	Reference ¹
		B-204-12	03/08/2024 - • the ability for any intervention to address the existing I-71/I-75 design • meeting public engagement requirements of the people most impacted by the project	KYTC and ODOT have conducted extensive public involvement during the development of the BSB Corridor Project, as documented in the <u>Public Involvement</u> <u>Summary</u> (January 2024). Efforts have included: updating the project website; establishing social media accounts; distributing e-newsletters; conducting 12 small-scale and 4 broad-scale targeted EJ/neighborhood outreach meetings; and holding 2 open-house style project update meetings. KYTC and ODOT have evaluated and responded to all comments received during the project's development.	Public and Stakeholder Involvement (5.1) Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)
				Members of the public were also provided the opportunity to review the supplemental EA, attend in-person and virtual public hearings, and provide comments to KYTC and ODOT during the 30-day public availability period. To make sure that all populations were aware of these opportunities, postcards advertising the availability of the supplemental EA and the public hearings were delivered to nearly 50,000 mailboxes in the greater Cincinnati/Northern Kentucky area. Public involvement will continue to occur during the design and construction of the project.	
				Community members generally supported the refinements, mitigation, and enhancements incorporated into Refined Alternative I (Concept I-W), including the reduction of the project footprint, additional developable land, additional noise and noise/visual screening barriers, measures to reduce flooding and combined sewer overflows, new and improved multimodal facilities, and aesthetic features. Throughout the project's development, the public offered additional feedback and suggestions. KYTC and ODOT have incorporated several refinements into Refined Alternative I (Concept I-W) in direct response to the additional comments and feedback that were gathered.	
				KYTC and ODOT are committed to a robust public and stakeholder involvement process during the design and construction of the BSB Corridor Project. To facilitate	



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				public involvement and outreach, the project <i>Public</i> <i>Engagement Plan</i> will be updated to guide public and stakeholder engagement (including EJ populations, identified socioeconomic populations and groups, and disadvantaged communities) during detailed design and construction.	
		B-204-13	03/08/2024 - I am happy to share the details behind this list of concerns. Once again, please do a full EIS before moving forward with this project without a point of return.	The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA.	Introduction (1.)
B-205	Fischer, Greg (Technical Team)	B-205-1	03/08/2024 - Support for USDOT Priorities: Our region is supportive of USDOT's stated priorities, particularly those of Transformative Projects, Wealth Creation, Safety, Power of Community, Equity, and Meaningful Public Involvement. A \$3.6B project should accomplish all of these goals.	The Brent Spence Bridge (BSB) Corridor project supports U.S. Department of Transportation priorities. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors.	Purpose and Need (2.)
		B-205-2	03/08/2024 - Transformative Projects: The Brent Spence Bridge Corridor Project has the potential to create a lasting positive and transformative effect for the citizens of the Greater Cincinnati region, including those most directly impacted by its construction and reconfiguration. Neglecting this moment of opportunity would squander a century's worth of potential progress and disregard the significance of righting a historic wrong. The livability of our community is at stake.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. An <u>Environmental Justice Analysis Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on environmental justice (EJ) populations. The EJ analysis was conducted in accordance with the U.S. Department of Transportation Order 5610.2C and FHWA Order 6640.23A, which define disproportionately high and adverse effects. The EJ analysis also followed	Purpose and Need (2.) Neighborhood and Community Cohesion (4.1.2) Travel Patterns and Access (4.1.4)



ID	Name	No.	Comment	Response	Reference ¹
			This is not an unreasonable request. Our team has gone to unprecedented lengths to be specific in stating desired outcomes.	FHWA's Guidance on Environmental Justice and the National Environmental Policy Act (NEPA) (December 16, 2011).	Environmental Justice (4.1.7)
			 Wealth Creation: Almost 75 years ago, the West End neighborhood, a predominately minority community, was essentially demolished by construction of Interstate 75, eliminating generational wealth in the form of small business and home ownership. The City of Cincinnati recently issued a public apology to the West End community for its complicity in this decision-making. Narrowing the cross section of I-75 through use of retaining walls, and creating a street grid, provides an opportunity for this legacy neighborhood to expand and benefit from access to valuable real estate in walkable proximity. Power of Community, Equity, and Meaningful Public Involvement: Although much of project development predated USDOT's October 2022 release of "Promising Practices for Meaningful Public Involvement in Transportation Decision- Making", the January 2021 launch of the "Justice40" initiative, the January 2021 release of Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities, and the February 2023 release of Executive Order 14091: Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, these orders, initiatives and guidance existed during the period of time the Supplemental Environmental Analysis was conducted and should have guided it. Considering how the project performs for the community provides much opportunity to 	 The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on EJ populations: No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; No adverse indirect effects; No disproportionately high and adverse relocation, noise, or temporary construction effects; and Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood. Refined Alternative I (Concept I-W) was evaluated for cumulative effects specific to EJ populations. Refined Alternative I (Concept I-W) will result in a minor contribution to cumulative residential and commercial displacements and a cumulative loss of parkland and historic resources in these communities. These minor cumulative effects will be experienced by all populations and communities, including EJ populations and non-EJ populations. Cincinnati's West End, now partitioned into the Queensgate and West End neighborhoods, is an area with known EJ populations that was historically impacted by urban renewal plans that were common in the United States in the mid-twentieth century. Refined Alternative I (Concept I-W) requires one commercial relocation (a small printing shop) in the West End neighborhood. In addition, the footprint of Refined Alternative I 	

Public Hearing Public Comments and Responses

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			 address the goals of reconnecting downtown to the former West End neighborhood now known as Queensgate, and improving walkability, pedestrian and micro-mobility safety. However, these goals have not been given adequate consideration in project design. The document relies solely on the economic benefit of construction period job training and inclusion programs instead of the true measure being the lasting effects of the project itself on the community to satisfy obligations under Justice40. 	amounts of strip right-of-way in the West End neighborhood. Refined Alternative I (Concept I-W) will not add to or exacerbate any adverse effects in the West End community from prior actions or events. In recognition of the history of City-sponsored urban renewal and the original Mill Creek Expressway (I-75) construction and as an enhancement in the West End neighborhood, ODOT will work with the City of Cincinnati, which includes the West End Community Council, to develop content for an interpretive display describing the West End community in relation to historic City urban renewal and the Millcreek Expressway construction and to identify a location in proximity to the I-75 corridor to install the display.	
			There was a missed opportunity during both scoping and public engagement to understand and work with those who will be most burdened, most impacted, and most importantly need the opportunity to improve their quality of life. The true measure of success of the policies noted above is where the benefits are experienced after the project is completed. This opportunity was compartmentalized under "Environmental Justice" evaluation and dismissed as not	Refined Alternative I (Concept I-W) will improve community cohesion; improve traffic flow and safety for all modes of travel; improve air quality; abate noise; reduce flooding and combined sewer overflows; improve aesthetics; and provide additional economic opportunities, which will help to offset any cumulative effects from past, present, and reasonably foreseeable actions. Therefore, no adverse cumulative effects on EJ populations are expected to occur as a result of Refined Alternative I (Concept I-W).	
			 having a disparate negative impact. The document states that "In recognition of city-sponsored urban renewal and the original Mill Creek Expressway construction and as an enhancement in the West End neighborhood, ODOT will work with the City of Cincinnati, which includes the West End Community Council, to develop content for an interpretive display describing the West End community in relation to historic city urban renewal and the Mill Creek Expressway construction and to identify a location in proximity to the I-75 corridor to install the display." Although acknowledging past transgressions is a noble undertaking and should be pursued, 	The project has incorporated robust engagement of EJ populations. Opportunities for EJ communities to offer feedback about the project occurred during 16 targeted EJ/neighborhood outreach meetings in late 2022 and open-house project update meetings in August 2023. All meetings were attended by residents of the targeted neighborhoods. Community members generally supported the refinements, mitigation, and enhancements incorporated into Refined Alternative I (Concept I-W), including the reduction of the project footprint, the incorporation of additional noise/visual screening barriers, measures to reduce flooding and combined sewer overflows, new and improved multimodal facilities, additional developable land, and aesthetic features. During the EJ outreach comment period, community members offered additional feedback and suggestions.	

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			this does nothing to address Indirect and Cumulative effects on the neighborhood. The West End Community would be better served by narrowing the footprint of the facility and giving it back a walkable community.	Every comment was evaluated by the project team, and individual responses were prepared and published on the project website. Furthermore, the project team incorporated several refinements into Refined Alternative I (Concept I-W) in direct response to the comments received. Unanticipated additional impacts on EJ populations were not identified during the EJ outreach.	
				Minority and low-income individuals were provided the opportunity to review the supplemental EA, attend in- person and virtual public hearings, and provide comments to KYTC and ODOT during the 30-day public availability period. To make sure that all populations were aware of these opportunities, postcards advertising the availability of the supplemental EA and the public hearings were delivered to nearly 50,000 mailboxes in the EJ study area. Public involvement will continue to occur during the design and construction of the project. Furthermore, KYTC and ODOT will continue coordinating with the Project Advisory Committee and local agencies and stakeholders, who will continue to act as liaisons to the communities immediately affected by the project.	
				Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained, including in West End. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. The new and improved pedestrian and bicycle infrastructure will improve access in and between the Cincinnati Central Business District (CBD) Riverfront, Queensgate, and West End neighborhoods in Ohio. New bicycle lanes and shared- use paths incorporated into Refined Alternative I (Concept I-W) will also support future planned improvements of regional pedestrian and bicycle networks. In addition, ODOT is continuing to coordinate local connections with the City of Cincinnati.	



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				Refined Alternative I (Concept I-W) is anticipated to have a net benefit to community cohesion due to the incorporation of aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements.	
		B-205-3	03/08/2024 - Safety: Replacing the existing system of high-speed free-flow entrance and exit ramps to and from city streets with a local access road, or "street grid" provides a safer environment for vehicular, pedestrian and micro-mobility traffic, and encourages modal shift without compromising functionality and performance. This request is reasonable and not outside the norms for similar projects. ODOT builds ramps that by geometric design encourage a speed in excess of the posted speed limit, resulting in a dangerous mixture of high-speed vehicular traffic entering an urban environment where lower-speed local streets service transit and pedestrians. The highest priority is not delivering SOVs as fast as possible, but improving the human experience once arrived.	Refined Alternative I (Concept I-W) will improve vehicular safety by including measures to reduce congestion-related crashes. In addition, the collector-distributor roadway system will improve safety by separating through and local traffic and keeping them separate for longer distances, thus reducing weaving movements that increase the risk of crashes. The removal of left-hand exits and other design deficiencies such as substandard shoulders are also expected to improve safety and reduce crashes by further reducing weaving movements and by providing a larger buffer for vehicles. In addition, two existing one-way bridges on Ezzard Charles Drive over I-75 in West End will be replaced with one combined two-way bridge to reduce the high number of wrong-way crashes occurring at this location. The <u>Interchange Modification Study Addendum</u> (December 2023) documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's Interactive Highway Safety Design Model. In support of the KYTC Complete Streets, Roads, and Highways Policy, the ODOT Multimodal Design Guide, and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) Regional Complete Streets Policy, Refined Alternative I (Concept I-W) will promote safety for bicyclists and pedestrians. The ramp connections with local streets are being designed as lower-speed urban roadways, which will encourage drivers to decelerate to safe speeds prior to reaching bicyclist and pedestrian safety and pedestrian safety and pedestrian	Traffic (3.8) Refined Alternative I (Concept I-W) and Purpose and Need (3.9) Travel Patterns and Access (4.1.4)



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				underpass areas to improve safety and security for pedestrians and bicyclists.	
				Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. New and improved pedestrian and bicycle infrastructure is also provided on local streets that are parallel to or cross I-75. In addition, ODOT is continuing to coordinate local connections with the City of Cincinnati.	
		B-205-4	 03/08/2024 - Purpose and Need: Purpose and Need for the project remain as was written in May 2006. There is no evidence that scoping has been updated during the past eighteen years, in fact an offer by the City of Covington KY, to participate in updated scoping efforts was rejected by the Bi-State Management Team as the sole responsibility and purview of the the state DOTs. It appears that the Bi-State Management Team established its authority but failed to execute its responsibility. The project Purpose and Need Statement is narrowly constructed to support the interests of the State DOTs: Improve traffic flow and level of service. Improve safety: Correct geometric deficiencies; and Maintain connections to key regional and national transportation corridors. There is no doubt that the proposed solution (Refined Alternative I also known as I-W) accomplishes these purposes, but it does not accomplish the greater good for the impacted communities discussed above under "Support for USDOT Priorities", or the goals articulated 	The project purpose and need is unchanged from what was presented in the approved 2012 EA/FONSI. The 2012 EA/FONSI demonstrated that Selected Alternative I met the project purpose and need. Refined Alternative I (Concept I-W) reduces the project footprint, improves the project's functionality, and does not substantially change the key design components of Selected Alternative I (from the 2012 EA/FONSI). Therefore, Refined Alternative I (Concept I-W) continues to meet the project purpose and need. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives (which are listed by the commenter), and have support at the local level may be incorporated into the project. The supplemental EA has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact	Introduction (1.) Purpose and Need (2.) Development of Refinement Concepts (3.2) Additional Refinements (3.3) Future Design Refinements (3.7) Refined Alternative I (Concept I-W) and Purpose and Need (3.9) Project Refinements (Appendix A)

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			 as Contract Objectives in the Progressive Design Build Request for Proposals: 1. Maximize the Project scope within the programmed funding amounts through innovation, design optimization and effective risk mitigation; 2. Build a project with a context sensitive design that fits within the community; 3. Maximize the public investment in the Project by minimizing the footprint; 4. Minimize the footprint of the interstate system to maximize potential developable space; 5. Improve neighborhood connectivity across the interstate; 6. Minimize traffic distribution during construction, with minimal detours or diversion of traffic to the local streets; 7. Provide opportunities for Workforce Development and DBE utilization; 8. Provide strong aesthetic value along the Project corridor; 9. Achieve effective project delivery; 10. Minimize physical intrusion and impact; 11. Create best environmental outcomes; 12. Design for sustained quality of life; 13. Improve the local road aesthetics when crossing the interstate; and 14. Open the traffic on the new Companion Bride by July 15, 2029. These goals were developed prior to issuance of the DSEA, but none were carried forward into the DESA document. Instead, the DSEA and associated public hearing presentation emphasized that "nothing has changed" since the 2012 EA/FONSI. This assertion is clearly not correct and if this claim shaped and constrained the work performed in the DESA, it is severely troubling. 	changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional NEPA reevaluation and coordination efforts that have occurred since the 2012 EA/FONSI. The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. Detailed descriptions of the refinements incorporated into the project since the 2012 EA/FONSI are provided in the supplemental EA, and further supporting documentation is provided in its appendices.	



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		B-205-5	03/08/2024 - SEA Procedural Deficiencies: We appreciate that much time and effort went into updating the 2012 Environmental Assessment, However, the DSEA document is a total of 317 pages, excluding 74 pages of Table of Contents and Executive Summary, 275 pages of appendices, and 39 additional Supporting Plans, Documents and Reports incorporated by reference and enumerated on pages viii and ix of the Table of Contents. Its length may indeed be a detriment to the public's understanding of the most important issues. The presumptive page limit for an Environmental Assessment is 75 pages. Not only does this document exceed the presumptive page limit for an EA, but also it exceeds the presumptive page limit for an EIS of "unusual scope or complexity". It appears to be an EA trying to legitimize why it is not an EIS. The reason it is not an EIS is that the real work of an EIS was not accomplished during scoping or meaningful public involvement. This is not to advocate that an EIS is required, or the page count be shortened, but to note that after 20 years of study, and missing several published completion dates for the DSEA, the process allows only a total of 30 days of public comment, and a mere 15 days following the public hearings. It appears that the development team is trying to make up lapsed time by limiting the ability of the public to digest and comment on the massive document.	The supplemental EA has been prepared pursuant to NEPA and applicable regulations. The public availability, public hearings, and comment period for the supplemental EA were conducted in accordance with the project <i>Public Engagement Plan</i> and applicable federal and state requirements and guidance. KYTC and ODOT have conducted extensive public involvement during the development of the BSB Corridor Project, as documented in the <i>Public Involvement</i> <i>Summary</i> (<i>January 2024</i>). Efforts have included: updating the project website; establishing social media accounts; distributing e-newsletters; conducting 12 small-scale and 4 broad-scale targeted EJ/neighborhood outreach meetings; and holding 2 open-house style project update meetings. KYTC and ODOT have evaluated and responded to all comments received during the project's development. The design of Refined Alternative I (Concept I-W) has been refined in several locations in direct response to public comments. Information about ongoing project activities will be shared with the public through project website updates, social media, e-newsletters, local media, presentations to local groups, and virtual project updates. In addition, KYTC and ODOT will establish multiple methods for the public to make inquiries about the project during detailed design and construction (including via the project website, email, direct mailings, and phone) and will provide timely responses to inquiries that are received. KYTC and ODOT will also continue coordinating with the Project Advisory Committee and local agencies and stakeholders, who will continue to act as liaisons to the communities immediately affected by the project.	Introduction (1.) Public and Stakeholder Involvement (5.1) Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)
		B-205-6	03/08/2024 - CEQ Guidance: In 2011, the Council on Environmental Quality issued guidance that "use of mitigation may allow the agency to comply with NEPA's procedural requirements by issuing an EA and a Finding of	The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W) as proposed. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA and the	Environmental Commitments (Section 6. and ES-Table II)



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			No Significant Impact (FONSI), or 'mitigated FONSI,' based on the agency's commitment to ensure the mitigation that supports the FONSI is performed, thereby avoiding the need to prepare an EIS. CEQ Rule 76 FR 3843 states that mitigation commitments (environmental commitments discussed on pages 288 through 317 of the DSEA and ES-Table II: Environmental Commitments) should be explicitly described as ongoing commitments and should specify measurable performance standards and adequate mechanisms for implementation, monitoring and reporting. Although there is assignment of responsibility for mitigation measures in ES-Table II, there is no discussion of performance measures (how successful mitigation is defined going forward), no identification of funding sources for monitoring ongoing compliance, no discussion of enforcement measures or what remediation would be possible if the mitigation measures were unsuccessful, and no documentation of consultation with, or agreement of appropriate stakeholders. A properly designed project with a narrower footprint would alleviate the need for many of the environmental commitments, this is a model already adopted around the country, and would shift the conversation from mitigation of impacts to project benefits.	 outcome of the comments received during the public availability period for the supplemental EA. The final NEPA decision for the BSB Corridor Project will include a final, comprehensive list of environmental commitments incorporated into the project. Per 23 CFR § 771.109(b)(1), KYTC and ODOT, in cooperation with FHWA, are responsible for implementing mitigation measures stated as commitments in the supplemental EA and the final environmental decision documents unless FHWA approves of their deletion or modification in writing. FHWA will ensure that this is accomplished as a part of its stewardship and oversight responsibilities. The BSB Corridor Project has been designated a Major Project by FHWA. As such, Title 23 of the United States Code section 106(h)(2) requires the development of a <i>Project Management Plan</i>. For more information about <i>Project Management Plans</i>, please visit: https://www.fhwa.dot.gov/majorprojects/pmp/index.cfm. KYTC, ODOT, and FHWA have developed a <i>Project Management Plan</i> for the BSB Corridor Project, which will be updated as the project phases advance. Among other items, the <i>Project Management Plan</i> emointoring. Per the BSB Corridor <i>Project Management Plan</i>, ODOT and KYTC will meet all commitments and project-specific mitigation and enhancement items included in the project's environmental clearance. The ODOT project managers for the Phase I, II, and III contracts, and the KYTC project manager for the Phase III contract will track and enforce implementation of the environmental commitments for the BSB Corridor Project will be evaluated and documented at the conclusion of the final design and construction phases of each contract. The project mitigation measures and environmental commitments (including permits) will be reviewed at the 	

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				pre-construction meetings with ODOT's construction staff, KYTC's construction staff, and the contractors. The BSB Corridor Project will be reviewed during construction by ODOT's district staff and KYTC's district staff to ensure that the mitigation measures and environmental commitments are carried out and to determine if additional mitigation measures and environmental commitments are needed. In addition, monthly status reports submitted to FHWA will include updates on mitigation measure and environmental commitment monitoring and status.	
		B-205-7	03/08/2024 – Coordination: Again, the "Utility Coordination Model" with compliant bureaucrats has been substituted for actively engaging the real stakeholders. ODOT has confirmed that its sole point of contact for City of Cincinnati decision making is the City Department of Transportation and Engineering. Cincinnati is organized under a City Manager form of municipal governance wherein the administration has almost no accountability to the policy makers of Cincinnati City Council. The Mayor of the City of Cincinnati's only real authority is to hire or fire the City Manager with approval of Council.	ODOT's primary point of contact for transportation projects within the City of Cincinnati has been, and will continue to be, the Cincinnati Department of Transportation and Engineering (DOTE). Through this coordination, KYTC and ODOT have been informed that the Cincinnati DOTE is coordinating with other city departments and providing consolidated feedback on the project to KYTC and ODOT. ODOT is coordinating drainage design and stormwater management details with the Metropolitan Sewer District of greater Cincinnati (MSD) and is coordinating stormwater treatment requirements with the Ohio Environmental Protection Agency (OEPA).	Utilities (4.12.1) Local Agency Coordination (5.2) Participating & Cooperating Agencies (5.4) Ongoing Public & Stakeholder Involvement (5.6)
			 approval of Council. Absent that, Council is required to issue an ordinance to require compliance with its policy decisions. It has already issued a resolution supporting creation of a street grid, but apparently behind the scenes, this is not being supported by the City administration. Similarly, ODOT has identified the Metropolitan Sewer District as it's point of contact for all things stormwater or water quality related. Hamilton County is the Owner of the Metropolitan Sewer District (District), and the City of Cincinnati (City) is its Operating Agent. Hamilton County is responsible to the 	The U.S. Environmental Protection Agency (USEPA) is a federal cooperating agency for the BSB Corridor Project. FHWA held regular coordination meetings for federal participating and cooperating agencies throughout the development of the supplemental EA. The City of Cincinnati, the Hamilton County Engineer, the Hamilton County Regional Planning Commission, and OEPA are participating agencies for the BSB Corridor Project. All cooperating and participating agencies were notified of the opportunity to offer feedback on the supplemental EA during the public availability period, and individual responses will be prepared for any comments received from participating and cooperating agencies.	

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			ratepayers for judiciously managing the District's budget and complying with the Combined Sewer System Consent Decree. The City is primarily interested ODOT's contribution towards the District's long term asset management obligations as noted in the "10142950 East Branch Ohio River Interceptor Extension Business Case Evaluation". ODOT has failed to effectively consult with the broader water resource community. Neither the agencies, including ORSANCO, USEPA, OEPA, nor Non-Governmental Organizations including Sierra Club, Mill Creek Alliance, and Rivers Unlimited, were involved in developing a water resource plan for the project that would mitigate significant direct and cumulative effects of toxic highway stormwater runoff in Ohio. Narrow scoping and identification of "decision makers" is antithetical to the intent of NEPA.	Points of contact for Hamilton County have already been established through its membership on the BSB Corridor Project Advisory Committee and its status as a participating agency during the environmental process. As part of its commitment to ongoing coordination with local agencies, ODOT will work with Hamilton County to establish appropriate timeframes to schedule meetings to further discuss stormwater measures that are being developed in conjunction with MSD. ODOT anticipates these meetings will occur during the plan development for Phases I and II and during the proof-of-concept and project development portions of the Phase III progressive design-build project. KYTC and ODOT will continue to coordinate water quality issues with OEPA, including through the Section 401 Water Quality Certification process and National Pollutant Discharge Elimination System permitting process. KYTC and ODOT received comments from other individuals and organizations related to stormwater and water quality through public involvement activities conducted for the BSB Corridor Project, including the comment period for the supplemental EA. KYTC and ODOT have considered and responded to all public comments received during the project's development. KYTC and ODOT will continue to coordinate with the Project Advisory Committee and appropriate local city, county, planning, and transit agencies throughout the procurement, final design, and construction phases of the project.	
		B-205-8	 03/08/2024 - Denying requests for Cooperating Agency Status: Proving there are no significant impacts is not the purpose of an EA/Mitigated FONSI, the purpose is resolving those potential impacts. Hamilton County requested Cooperating Agency status, based on "Jurisdiction by Law, and Special Expertise", but its request was denied by FHWA. The intent of the request was 	On February 15, 2023, the Hamilton County Board of Commissioners submitted a request to FHWA to be designated a cooperating agency for the BSB Corridor Project. On March 24, 2023, FHWA declined the request because the Hamilton County Board of Commissioners does not have jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for a major federal action that may significantly affect the quality of the	Participating & Cooperating Agencies (5.4) Local Agency Coordination (5.2) Ongoing Public & Stakeholder

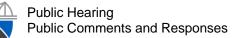


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			to resolve regional water quantity and quality resource issues early in the process so as not to cause delay after issuance of the DSEA. The City of Cincinnati also explored Cooperating Agency status based on FHWA Ohio Division's suggestion that this would be an appropriate avenue of participation. The idea was rebuffed by ODOT. These local agencies were attempting to assert their interests at a stage when there would be the least amount of impact to the schedule. Instead FHWA chose to retain control of the review process until after the DSEA was issued.	human environment. On May 26, 2023, FHWA issued additional participating agency invitations to local agencies, including the Hamilton County Engineer, the Hamilton County Board of Commissioners, and the City of Cincinnati, all of which accepted the invitation. All participating agencies were provided the opportunity to offer feedback on the supplemental EA during the public availability period, and individual responses will be prepared for any comments received from participating agencies. ODOT and the City of Cincinnati met regularly with local stakeholders to discuss the BSB Corridor Project. In addition, both Hamilton County and the City of Cincinnati are members of the Project Advisory Committee, which was established to provide opportunities for representatives from government agencies, community groups, and businesses with vested interests in the project area to provide feedback on the BSB Corridor Project. Three Project Advisory Committee Meetings were held between 2022 and 2024. KYTC and ODOT will continue to coordinate with the Project Advisory Committee to provide project updates and gather feedback during design and construction of the project.	Involvement (5.6)
		B-205-9	03/08/2024 – Summary: We urge you to acknowledge and honestly assess the alternative that has been advocated by multiple parties and to provide a true and meaningful evaluation of what is being promised to our community. This is something that we should be openly dealing with now to be efficient and protective of time and process.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Refined Alternative I (Concept I-W) represents the base design for the BSB Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support design-build contract objectives, and have support at the local level may be incorporated into the project. During the evaluation of innovation concepts, KYTC and ODOT have committed to	Purpose and Need (2.) Future Design Refinements (3.7)



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				further evaluating comments and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration and developed by the Greg Fischer BSB Technical Team.	
		B-205-10	03/08/2024 - It is our conclusion that the DSEA does not adequately address changes in either Law and Regulation, or in current conditions and community needs and expectations. These deficiencies can be cured during conceptual and detailed design through adequately constructed environmental commitments as outlined and described above by the Council on Environmental Quality. As offered previously, our team is available to collaborate with the Bi- State Management Team and its Design-Build Team to arrive at a supportable Finding of No Significant Impact.	The supplemental EA has been prepared consistent with 23 CFR §§ 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional NEPA reevaluation and coordination efforts that have occurred since the 2012 EA/FONSI. The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements.	Introduction (1.)
B-206	Butler, Matt	B-206-1	03/08/2024 – Here's some additional comments on the BSB Expansion project.	The attachment included copies of eleven individual submissions which are titled "Comments to Cincinnati City Council Regarding the Brent Spence Corridor Project." Therefore, no response, other than to document the attached documents as received, is provided. KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including those provided by the City of Cincinnati, prior to FHWA making a final decision on the supplemental Environmental Assessment. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	Public Hearing (5.5)
B-207	Fischer, Greg	B-207-1	03/08/2024 - As an enthusiastic Brent Spence Bridge Corridor Project supporter in response to issuance of the Brent Spence Bridge	Refined Alternative I (Concept I-W) will change how through (interstate) traffic and local traffic travel through the corridor while maintaining most existing travel	Purpose and Need (2.)





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			Corridor Project Draft Supplemental Environmental Assessment. Our community is grateful that the Department selected the Brent Spence Bridge Corridor Project to advance through programs created under the Bi- Partisan Infrastructure Law. We are also grateful to the State of Ohio and the Commonwealth of Kentucky for their financial support, as well as the persistence of the Ohio, Kentucky, Indiana Metropolitan Planning Organization and the Greater Cincinnati Chamber of Commerce for making certain that the project remains a priority at all levels of government. We are asking that the Bi-State Management Team explicitly commit to resolving any engineering challenges that may arise in delivering the specific outcomes we are requesting, and to preparing an engineer's opinion of probable costs associated with these outcomes in order that the City of Cincinnati residents and leadership can have a rewarding and factually based discussion about return on investment. These requested outcomes are: 1. Realignment of 1-75 to reduce interstate and infrastructure footprint, decreasing the width by at least 200 feet compared with Refined Alternative I. 2. Creation of local urban access roads along I- 75, from 3 rd Street to 9 th Street, restoring the street grid. 3. Extension of a local street linking 5 th Street with 1-75 access roads on both sides of the interstate.	connections and accommodating minor rerouting of traffic where access points are modified. In Ohio, all existing local street connections across I-75 are maintained. In addition, ODOT is continuing to coordinate local connections with the City of Cincinnati. Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked with the City of Covington and the City of Cincinnati to incorporate several refinements that reduce the project's overall footprint, including optimizing interchange geometry by utilizing the land formerly occupied by the dunhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge. Refined Alternative I (Concept I-W) represents the base design for the Brent Spence Bridge (BSB) Corridor Project. It is anticipated that the design-build team for the Phase III progressive design-build contract will develop innovation concepts (design refinements) that will be evaluated by KYTC and ODOT. Innovations that improve project quality, reduce costs, shorten schedule, support the design-build contract objectives, and have support at the local level may be incorporated into the project. Some of the design-build contract objectives that will be considered during the evaluation of innovation concepts include: minimizing physical intrusion and impact; maximize potential developable space; improving neighborhood connectivity across the interstate; and building the project with a context sensitive design that fits within the community. During the evaluation of innovation concepts, KYTC and ODOT have committed to further evaluating comments	Additional Refinements (3.3) Future Design Refinements (3.7) Travel Patterns and Access (4.1.4)

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				and concepts submitted by Bridge Forward, including the latest concepts submitted for consideration and developed by the Greg Fischer BSB Technical Team.	
				KYTC and ODOT will consider costs when evaluating innovation concepts. After the evaluation of innovation concepts is complete and KYTC and ODOT have made the final decisions about innovations to incorporate into the project, an opinion of probable cost will be prepared for the overall project. The purpose of the opinion of probable cost is to confirm that the design is staying within the programmed funding for the project.	
		B-207-2	 03/08/2024 - As with many undertakings, this one has been a stop and start activity due to policy considerations and funding constraints. It has been 20 years since the first feasibility study was performed. Much has changed during this time, as was acknowledged by FHWA in its decision to perform a Supplemental Environmental Analysis. Following passage of the BIL in 2021, I was approached by Bridge Forward, a local group advocating for better Urban Livability, with a concept that would potentially improve local community outcomes. This concept suggested narrowing the footprint of the Bridges' (existing and companion) approaches and landings on the Ohio side of the river. As a Civil Engineer, home builder and member of the regional business community, I was intrigued by the potential benefits and hired an intern to review the feasibility of the concept. 	KYTC and ODOT have conducted extensive public involvement during the development of the BSB Corridor Project, as documented in the <u>Public Involvement</u> <u>Summary</u> (January 2024). Efforts have included: updating the project website; establishing social media accounts; distributing e-newsletters; conducting 12 small-scale and 4 broad-scale targeted environmental justice/neighborhood outreach meetings; and holding 2 open-house style project update meetings. KYTC and ODOT have evaluated and responded to all comments received during the project's development. Members of the public were also provided the opportunity to review the supplemental Environmental Assessment (EA), attend in-person and virtual public hearings, and provide comments to KYTC and ODOT during the 30-day public availability period. To make sure that all populations were aware of these opportunities, postcards advertising the availability of the supplemental EA and the public hearings were delivered to nearly 50,000 mailboxes in the greater Cincinnati/Northern Kentucky area.	Public and Stakeholder Involvement (5.1) Public Hearing (5.5) Ongoing Public & Stakeholder Involvement (5.6)
			In their understandable eagerness to secure DOT funding following the bi-state application for discretionary funds, local institutional leaders discouraged public discussion about revisions to alternatives considered in the 2012 NEPA decision, stating that they did not want to	Community members generally supported the refinements, mitigation, and enhancements incorporated into Refined Alternative I (Concept I-W), including the reduction of the project footprint, additional developable land, additional noise and noise/visual screening barriers, measures to reduce flooding and combined sewer	

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			"reopen" NEPA to public comment, thus chilling public discussion and by citing the grant funding selection criteria of "project readiness" quote for mega projects seeking federal transportation dollars in the 2022 cycle. NEPA was nonetheless quote reopened quote by FHWA, but the discouragement of public discussion resulted in at least a year of reluctance by business, civic, and elected leaders to engage in any public conversation, or raise questions about the project's importance to, impacts on, or opportunities to do better for the local community.	overflows, new and improved multimodal facilities, and aesthetic features. Throughout the project's development, the public offered additional feedback and suggestions. KYTC and ODOT have incorporated several refinements into Refined Alternative I (Concept I-W) in direct response to the additional comments and feedback that were gathered, including the refinements referenced by the commenter. These refinements are incorporated into the environmental commitments for the project. As part of the public involvement conducted for the project, ODOT and the City of Cincinnati have also held multiple working sessions with Bridge Forward and the Greg Fischer Technical Management Team to discuss their ideas about the BSB Corridor Project. KYTC and ODOT have prepared detailed responses to several concepts submitted by Bridge Forward, which are included in the <i>Public Involvement Summary</i> . Information about ongoing project activities will be shared with the public through project website updates, social media, e-newsletters, local media, presentations to local groups, and virtual project updates. In addition, KYTC and ODOT will establish multiple methods for the public to make inquiries about the project during detailed design and construction (including via the project website, email, direct mailings, and phone) and will provide timely responses to inquiries that are received. Representatives from government agencies, community groups, and businesses with vested interests in the project area also provided feedback on the BSB Corridor Project through the Project Advisory Committee. KYTC and ODOT will continue to coordinate with the Project Advisory Committee to provide project updates and gather feedback during design and construction of the project.	
		B-207-3	03/08/2024 - In 2022, I elected to engage a group of independent professionals, well known to ODOT, to advise me about the Federal and	No response, other than to acknowledge the history of the commenter's efforts related to the BSB Corridor Project is acknowledged, can be provided.	N/A



th o d p te Ir ir f E E th	State DOT's project development process and the National Environmental Policy Act process. did so because I thought there were apportunities to improve the project design and lelivery outcomes in accordance with USDOT priorities and in better alignment with the core enants of NEPA, without delaying the project. In 2023 I retained an experienced and qualified independent design firm to evaluate both the Refinements to Selected Alternative" (that had ed the USDOT to decide a Supplemental Environmental Analysis was necessary), and		
te b D a 2 S	he concepts proposed by Bridge Forward, bringing them to a comparable level of echnical engineering development. I did this because time was critical: the Progressive Design Build Contract (for which my team had idvocated) was to be awarded May 1, 2023, and Notice to Proceed was to occur on July 15, 2023; And the Bi-State Management Team had ignaled their openness to engagement with		
S u th a c e o a M w a b	Subsequently, I retained a New York based orban planning and economics firm to evaluate the economic and value creation opportunities associated with the proposed alternative concepts in support of the business case for expanding local resources to improve project outcomes. Opportunities for value capture were also examined. My team of professionals was instructed to work creatively and constructively with ODOT and local officials to discover and illuminate tetter solutions of greater value to our		
	ti s u ti a c c e c c a M v v a b c c f	the City Regional Business Council. Subsequently, I retained a New York based urban planning and economics firm to evaluate the economic and value creation opportunities associated with the proposed alternative concepts in support of the business case for expanding local resources to improve project outcomes. Opportunities for value capture were also examined. My team of professionals was instructed to work creatively and constructively with ODOT and local officials to discover and illuminate better solutions of greater value to our community. All of the outputs and documents from my team have been made available to ODOT.	 the City Regional Business Council. Subsequently, I retained a New York based urban planning and economics firm to evaluate the economic and value creation opportunities associated with the proposed alternative concepts in support of the business case for expanding local resources to improve project outcomes. Opportunities for value capture were also examined. My team of professionals was instructed to work creatively and constructively with ODOT and local officials to discover and illuminate better solutions of greater value to our community. All of the outputs and documents from my team have been made available to

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			I then supported a well-attended community conversation, public outreach and information exchange convened by City of Cincinnati Council Member Meeka Owens, Chair of the City of Cincinnati Climate, Environment and Infrastructure Committee to discuss equity, desired outcomes, and achievability.		
			This is objectively the only window we have during the next century to improve the livability of our most at risk communities in a broad swath of our city that has suffered the most from transportation barriers.		
			I have expended significant personal time and resources on this effort because I believe that when given the opportunity to make transformative change, it is our responsibility to step up and advocate for that change.		
		B-207-4	03/08/2024 - I am attaching a report from my consulting team that should be included as comments about the Brent Spence Bridge Corridor Supplemental Environmental Analysis.	The report referenced by the commenter was received under separate cover (see Comment B-205). KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including those referenced by the commenter, prior to FHWA making a final decision on the supplemental EA. A detailed summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	Public Hearing (5.5)
		B-207-5	03/08/2024 - It is critical that the community understand what it is being asked to accept. The DSEA, as currently proposed leaves significant doubt about the specifics of how the environmental commitments will be achieved. We believe these concerns can be resolved during the progressive design build process, and that an Environmental Impact Statement is	The final National Environmental Policy Act decision for the BSB Corridor Project will include a final, comprehensive list of environmental commitments incorporated into the project. Per 23 CFR § 771.109(b)(1), KYTC and ODOT, in cooperation with FHWA, are responsible for implementing mitigation measures stated as commitments in the supplemental EA and the final environmental decision documents unless FHWA	Environmental Commitments (Section 6. and ES-Table II)



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			not required. However, strengthening of environmental commitments is necessary to advance the project.	approves of their deletion or modification in writing. FHWA will ensure that this is accomplished as a part of its stewardship and oversight responsibilities.	
				The BSB Corridor Project has been designated a Major Project by FHWA. As such, Title 23 of the United States Code section 106(h)(2) requires the development of a <i>Project Management Plan.</i> For more information about <i>Project Management Plans</i> , please visit: https://www.fhwa.dot.gov/majorprojects/pmp/index.cfm.	
				KYTC, ODOT, and FHWA have developed a <i>Project</i> <i>Management Plan</i> for the BSB Corridor Project, which will be updated as the project phases advance. Among other items, the <i>Project Management Plan</i> establishes protocols for environmental compliance monitoring.	
				Per the BSB Corridor <i>Project Management Plan</i> , ODOT and KYTC will meet all commitments and project-specific mitigation and enhancement items included in the project's environmental clearance. The ODOT project managers for the Phase I, II, and III contracts and the KYTC project manager for the Phase III contract will track and enforce implementation of the environmental commitments listed in the supplemental EA and the final environmental decision documents. Compliance with the environmental mitigation and enhancement commitments for the BSB Corridor Project will be evaluated and documented at the conclusion of the final design and construction phases of each contract.	
				The project mitigation measures and environmental commitments (including permits) will be reviewed at the pre-construction meetings with ODOT's construction staff, KYTC's construction staff, and the contractors. The BSB Corridor Project will be reviewed during construction by ODOT's district staff and KYTC's district staff to ensure that the mitigation measures and environmental commitments are carried out and to determine if additional mitigation measures and environmental commitments are needed. In addition, monthly status reports submitted to FHWA will include updates on	



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				mitigation measure and environmental commitment monitoring and status.	
B-208	Sierra Club Miami Group	B-208-1	 03/08/2024 - These comments on the January 12, 2024 Supplemental Environmental Assessment (SEA) prepared pursuant to the National Environmental Policy Act (NEPA) for the proposed Brent Spence Bridge Project (the "Project") are respectfully submitted on behalf of the Sierra Club Miami Group with additional comments to be submitted by the Ohio Sierra Club staff on behalf of Ohio's more than 125,000 members and supporters. Our members are concerned about the Project's potential to result in significant negative impacts to public health and the environment. In particular, the Project can be expected to result in significant impacts to air quality, water quality, historically disadvantaged communities, and to the global environment. While the proposed SEA addresses these and other topics, it does not adequately identify or discuss the full range of impacts that can be expected from the Project. As such, the SEA does not support a Finding Of No Significant Impact (FONSI). A full Environmental Impact Statement is required to adequately address the concerns outlined in our comments below and concerns raised by other concerned parties in the community (e.g. Bridge Forward and the Greater Cincinnati Coalition for Transit and Sustainable Development. The SEA, like the 2012 FONSI, must cover the entire project, not just the bridge construction. The analysis needs to be expanded to the entire corridor and the future ongoing impacts - for some 100 years of the operation of the bridge. The SEA must address anticipated changes in environmental regulations such as 	The supplemental Environmental Assessment (EA) has been prepared consistent with Title 23 of the Code of Federal Regulations (CFR) sections 771.129 and 771.130 and assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), further environmental commitments (enhancements and mitigation), and additional National Environmental Policy Act (NEPA) reevaluation and coordination efforts that have occurred since the 2012 EA and Finding of No Significant Impact (FONSI). The supplemental EA is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2012 EA/FONSI. The supplemental EA evaluates the potential direct, indirect, and cumulative effects of the entire 7.8-mile Brent Spence Bridge (BSB) Corridor Project. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. These include updated ecological surveys, new and updated air quality studies, new studies related to disadvantaged communities, updated stormwater studies and coordination, and the evaluation of indirect and cumulative effects. The supplemental EA evaluates indirect effects that are "reasonably foreseeable," or highly likely to occur because the project was built. The supplemental EA evaluates cumulative effects that potentially occur from adding the impacts from other past, present, and reasonably foreseeable projects. The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental assessments is to provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact. FHWA will make the	Introduction (1.) Disadvantaged Communities (4.1.9) Wetlands (4.2.1) Streams and Rivers (4.2.2) Air Quality (4.6) Indirect Effects (4.10.1) Cumulative Effects (4.10.2) Utilities (4.12.1) Public Hearing (5.5)

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			new stormwater or air pollution rules in proposed alternatives.	final NEPA determination based on the information and analyses presented in the supplemental EA and the outcome of the comments received during the public availability period for the supplemental EA. KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including those provided by other individuals associated with the Sierra Club, prior to FHWA making a final decision on the supplemental EA.	
		B-208-2	 03/08/2024 - 1. Project History and Flawed Planning The proposed Project was first envisioned in 2004. In 2012, the Federal Highway Administration (FHWA) certified an Environmental Assessment (EA) and issued a FONSI for the Project. In the subsequent decade-plus, both the 2012 EA and FONSI have become stale and irrelevant to current traffic patterns and the needs of a rapidly aging population as well as the needs of the Environmental Justice communities who are ill-served by a massive \$3.6 billion investment in a single mode of transportation that they cannot or should not use (i.e. highway driving). Traffic data do not support doubling highway capacity over the Ohio River from 8 current lanes to 16 lanes. Furthermore, the work done on the I-75 corridor in Greater Cincinnati to date shows that the environmental impact of new highway construction has been significant. The project has increased air pollution due to the construction and the sequencing of the project. Dust from the project has not been controlled. The increased number of lanes has resulted in more air pollution, including carbon dioxide. Water pollution in Mill Creek has increased due 	In accordance with NEPA, an EA was originally prepared for the BSB Corridor Project in the Commonwealth of Kentucky and the State of Ohio in March 2012. A FONSI was approved by FHWA on August 9, 2012. Reevaluations completed in 2015 and 2018 concluded that the 2012 FONSI remained valid. More than three years have passed since the 2012 FONSI and subsequent reevaluations of its validity. Project refinements have also occurred in response to public comments and further study, though they remain within the project footprint and impacts evaluated in the 2012 EA/FONSI. The supplemental EA has been prepared consistent with 23 CFR §§ 771.129 and 771.130. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. These include new traffic projections and an <i>Interchange Modification Study Addendum (December 2023)</i> , new and improved multimodal features, new and updated air quality studies, new consideration of greenhouse gas emissions and climate change. updated stormwater studies and coordination, and an updated cumulative effects analysis. The supplemental EA also evaluates the project's potential direct, indirect, and cumulative effects on all residents within the project areas, including, but not limited to, minorities, low-income individuals, older adults, individuals with limited English proficiency, zero-car households, adults with disabilities, and children. In	Traffic (3.8) Travel Patterns and Access (4.1.4) Environmental Justice (4.1.7) Socioeconomic Groups (4.1.8) Children (4.1.10) Air Quality (4.6) Greenhouse Gases and Climate Chang (4.7) Cumulative Effects (4.10.2) Utilities (4.12.1)

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			 to increased sedimentation and runoff. Increased stormwater and sediment have gone to the Wastewater Treatment Plant, its pipes and increased sewer overflows. The landslide at the Mitchell Avenue exit continues to slide and will need remediation. The lack of adequate stormwater controls along I-75 Northbound south of the Mitchell Avenue exit allowed runoff from the hillside to pour over and thru the Jersey barriers sending stormwater and mud across the highway. Also, it is extremely disturbing that the Project has caused one death from the Hopple Street "catastrophic pancake collapse." Ohio's rejection of rail in the corridor in the early 2000s contributes to the current adverse environmental impacts. The lack of multimodal transportation options in the current Project severely limit the benefits to be derived by EJ communities and will exacerbate the current climate crisis by increasing greenhouse gas emissions. 	addition, environmental commitments have been incorporated into the project to minimize and mitigate unavoidable impacts and to provide additional enhancements for local communities.	
		B-208-3	 03/08/2024 - 2. Purpose & Need The Project's purported Purpose & Need were identified in the 2012 FONSI: Improve traffic flow and level of service; Improve safety; Correct geometric deficiencies; and Maintain connections to key regional and national transportation corridors. 	Existing and historic traffic counts for the BSB were compiled using a variety of data generated by ODOT, KYTC, and the Ohio-Kentucky-Indiana Regional Council of Governments (OKI). Counts collected during 2020 and 2021 were not considered to be reflective of the travel demand in the corridor due to factors related to the COVID pandemic. The traffic projections for the BSB Corridor Project utilize a pre-COVID base year of 2019.	Traffic (3.8)
			We strongly disagree with the traffic projections that form the basis of the Purpose & Need and the plans to double highway capacity from 8 lanes crossing the Ohio River to 16 lanes with additional new lanes on the Kentucky and Ohio approaches. An analysis of traffic counts dating back to 2014 shows steady to declining traffic volumes (Figs 1A-C). The U.S EPA response	KYTC and ODOT developed design-level no-build and build certified traffic for the years 2029 and 2049, which reflected the anticipated opening day and design years for the entire BSB Corridor Project based on the most current project development. The certified traffic projections were based on existing 2019 traffic counts in the BSB corridor, the Ohio <i>Traffic Forecasting Manual</i> , and the OKI regional travel demand model of record. The 2029 and 2049	



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			 (SEA Part 2) clearly identifies "induced demand" as a concern with adding highway capacity and the impact additional highway traffic has on EJ communities. At a bare minimum, the companion bridge should be reduced to 4 lanes in each direction whereas traffic trends suggest 3 lanes in each direction would suffice to meet future demand for single vehicles as well as transit options to connect Ohio and Kentucky communities. [The comment includes a graph with the caption: Fig. 1A Traffic volumes on the Brent Spence Bridge from 2014-2023.] [The comment includes a map with the caption: Fig. 1B. Map showing area where data was abstracted from https://odot.public.ms2soft.com/TDMS.UI_Core /trafficviewer] [The comment includes a map with the caption: Fig. 1C OKI Traffic count data 2013 to 2021] 	certified traffic projections were used to prepare an <u>Interchange Modification Study Addendum</u> , and the methodology for developing the certified traffic projections is detailed in Appendix E of that report. When developing the traffic projections, OKI's regional travel demand model was used to assign routes used by travelers based on detailed information for individuals, households, number of lanes, projected trips, and calculated travel times. Projected traffic increases between 2019 and 2049 are due to several factors, including population and employment growth incorporated into OKI's regional travel demand model. Traffic projections prepared for Refined Alternative I (Concept I-W) also show that adding lanes will increase is due to travelers shifting trips they were already making from other congested routes. In addition, some travelers will make new trips they would not have made without the highway improvements (induced trips). The <u>Interchange Modification Study Addendum</u> used the updated traffic projections to vet and confirm the number of lanes on the interstate, ramps, collector-distributor roadways, frontage roads, and local street intersections in the project area. The <u>Interchange Modification Study</u> <u>Addendum</u> concluded that Refined Alternative I (Concept I-W) will provide acceptable traffic operations for all projected trips in the project area (including induced trips) through the year 2049, with a few minor exceptions during peak travel periods.	
		B-208-4	03/08/2024 - Safety will be impaired by bridge and access design Doubling highway capacity over the Ohio River from 8 lanes to 16 lanes in the preferred alternative I-W sets up an unsafe series of merges and lane changes on both sides of the river. Extensive research has demonstrated the high risks associated with merging and diverging traffic. Mergia et al. (2013)	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. Refined Alternative I (Concept I-W) will improve vehicular safety by including measures to reduce congestion- related crashes. In addition, the collector-distributor	Purpose and Need (2.) Refined Alternative I (Concept I-W) and Purpose and Need (3.9)

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			 specifically addressed the factors associated with higher injury severity in Ohio freeway accidents. Not surprisingly, semi-truck traffic was identified as one factor, but increasing the number of highway lanes was another significant factor with women and the elderly disproportionately affected. Pande and Abdel-Aty (2006) studied accidents along I-4 in Florida and concluded that "all sideswipe collisions and the angle crashes that occur on the inner lanesof the freeway may be attributed to lane-changing maneuvers." Zhang et al. (2022) calculated a 40% increase in accident severity around multi-lane interchanges and a 21% increase in severity for accidents in the left-most lane. The key factor was increased speed as congestion decreases. The SEA addresses only reduced congestion, but not does consider the impact of higher speeds and the merger of high-speed semitrucks merging back into lanes used by both through traffic and local traffic. It is clear that Preferred Alternative I-W does not meet the Stated Purpose and Need to improve safety. Interestingly, OKI data actually indicate there are other areas in much greater need of safety enhancements (Fig. 2). [The comment includes a map with the caption: Fig.2 Regional crash rates derived from https://gis.oki.org/crashrates/ The Crash Rate app lists the five-year averages of fatalities, injuries and crash rates per 100 million vehicle miles traveled on all public roads in the OKI region. Filtered by Interstates and major highways] 	roadway system will improve safety by separating through and local traffic and keeping them separate for longer distances, thus reducing weaving movements that increase the risk of crashes. The removal of left-hand exits and other design deficiencies such as substandard shoulders are also expected to improve safety and reduce crashes by further reducing weaving movements and by providing a larger buffer for vehicles. In addition, two existing one-way bridges on Ezzard Charles Drive over I-75 will be replaced with one combined two-way bridge to reduce the high number of wrong-way crashes occurring at this location. The <u>Interchange Modification Study</u> <u>Addendum</u> documents a detailed safety analysis that was conducted for the BSB Corridor Project using FHWA's <u>Interactive Highway Safety Design Model</u> . The analysis concluded that Refined Alternative I (Concept I-W) will reduce crashes on the existing BSB, the I-71/I-75 mainline in Kentucky, the I-75 mainline in Ohio, and locations of notable changes incorporated into Refined Alternative I (Concept I-W). In support of the KYTC Complete Streets, Roads, and Highways Policy, the ODT Multimodal Design Guide, and the OKI Regional Complete Streets Policy, Refined Alternative I (Concept I-W) will promote safety for bicyclists and pedestrians. The frontage roads and ramp connections with local streets are being designed as lower-speed urban roadways, which will encourage drivers to decelerate to safe speeds prior to reaching bicycle and pedestrian crossings. Furthermore, the buffer distance between automobile traffic and sidewalks and shared-use paths will be increased, improving bicyclist and pedestrian safety and comfort. Finally, lighting will be installed in underpass areas to improve safety and security for pedestrians and bicyclists.	
		B-208-5	03/08/2024 - 3. Alternatives CEQ NEPA regulations describe the importance of the alternatives analysis: "This	The alternatives analysis completed during the development of the 2012 EA/FONSI for the BSB Corridor Project considered 25 alternatives and over 25 sub-	Introduction (1.)

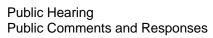


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			 section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (Sec. 1502.15) and the Environmental Consequences (Sec. 1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus, sharply defining the issues and providing a clear basis for choice among options by the decision-maker and the public." FHWA Technical Advisory T 6640.8A guidance recommends that the Alternatives Analysis section of environmental documents begin with a concise discussion of how and why the "reasonable alternatives" were developed for detailed study, and explain why other alternatives were eliminated. The SEA does not include a reasonable range of alternatives to the proposed Project. The SEA fails to discuss an alternative with fewer lanes than the "preferred alternative." The SEA fails to discuss an alternative that would minimize the Project's footprint, reduce negative impacts and increase safety. The SEA fails to allow for future transit/rail as an alternative, thereby shutting off avenues and choices for better movement of goods and people and significantly improving air and water quality. The SEA does not address alternatives to serve the high number of low-income, minority, elderly and no-car households in the Project corridor (Fig. 3). The small number of sidewalk and cycling enhancements do nothing to connect residents to jobs and services and provide no options for crossing the Ohio River other than vehicular traffic. The SEA does not address or meet the needs 	alternatives, including the no-build condition. Alternatives with fewer lanes were removed from further study because they could not accommodate the projected traffic demand. The alternatives evaluation for the BSB Corridor Project was documented in the 2012 EA and remains applicable to the project. Reevaluations completed in 2015 and 2018 concluded that the 2012 FONSI remained valid. The supplemental EA assesses updated regulatory requirements, changed site conditions, design refinements to the previously selected alternative, impact changes (mostly reductions), and further environmental commitments (enhancements and mitigation), that have occurred since the 2012 EA/FONSI. Refined Alternative I (Concept I-W) incorporates several refinements that reduce the project's overall footprint and associated impacts, including optimizing interchange geometry by utilizing the land formerly occupied by the dunnhumby USA headquarters, reducing shoulder widths to match updated design criteria, designing to appropriate speeds to reduce the required radii of curvature, constructing retaining walls, and reducing the width of the companion bridge. In 2004, OKI and the Miami Valley Regional Planning Commission (MVRPC) completed a major planning study known as the <i>North South Transportation Initiative</i> (Initiative) that considered highway improvements in addition to transit improvements such as express bus, commuter rail, and others. The Initiative concluded that transit improvements alone would not address capacity issues on I-71/I-75. Therefore, neither transit expansions nor passenger rail would meet the project purpose and need, and they are not considered to be reasonable alternatives for the BSB Corridor Project. The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Ini	Project History (1.2) Purpose and Need (2.) Alternatives (3.) Travel Patterns and Access (4.1.4) Environmental Justice (4.1.7) Socioeconomic Groups (4.1.8)

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			of the nearly 23% of residents in the corridor who do not have reliable access to a car (Fig. 3).	and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	
			[The comment includes a map with the caption: Fig. 3 OKI Environmental Justice map https://gis.oki.org/ej/]	The Southwest Ohio Regional Transit Authority (SORTA) and the Transit Authority of Northern Kentucky (TANK) have been involved in the development of the project and encouraged to provide feedback as members of the Project Advisory Committee. TANK also accepted an invitation to be a participating agency during the preparation of the supplemental EA. Refined Alternative I (Concept I-W) is compatible with local transit services, does not preclude future transit plans and will not result in permanent or detrimental effects on transit access.	
				Refined Alternative I (Concept I-W) is expected to provide an overall public benefit for transit in the area by reducing congestion and improving reliability for bus routes that use the existing BSB for 210 trips every weekday. In addition, new and improved sidewalks, shared-use paths, and bicycle lanes will enhance connections to existing bus stops.	
				An <u>Environmental Justice Analysis Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (environmental justice) populations. The analysis concluded that Refined Alternative I (Concept I-W) would not result in adverse effects on pedestrian, bicycle, or transit access and mobility in environmental justice (EJ) communities.	
				A <u>Socioeconomic Technical Report</u> (January 2024) was prepared to assess the effects of Refined Alternative I (Concept I-W) on several populations and groups, including older adults, individuals with limited English proficiency, adults with disabilities, and zero-car households. The analysis concluded that Refined Alternative I (Concept I-W) would have no impacts to pedestrian, bicycle, and transit access and mobility for these populations and groups.	



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		B-208-6	03/08/2025 - We concur with concerns raised by U.S. EPA during its review of the NEPA Analysis. "EPA is concerned with potentially significant construction and operational air quality and noise impacts on low-income and minority communities that have already experienced longstanding environmental impacts from I-71/I-75. EPA is also concerned with impacts from induced travel demand, induced development/growth, and direct and indirect releases of greenhouse gases." Mitigation plans (p. B5-156 Supplemental Environmental Assessment Appendices) recommended by U.S. EPA include planting coniferous trees along the roadways; however, the long-term benefits of these plantings are in doubt because conifers are most susceptible to particulate air pollution (Sidor et al. 2021).	The U.S. Environmental Protection Agency (USEPA) is a federal cooperating agency for the BSB Corridor Project. FHWA has addressed all comments received from federal cooperating agencies. All cooperating and participating agencies have been notified of the opportunity to offer feedback on the supplemental EA during the public availability period, and individual responses will be prepared for any comments received from participating and cooperating agencies.	Participating & Cooperating Agencies (5.4)
		B-208-7	 03/08/2024 - 4.0 Environmental Resources, Impacts & Mitigation The SEA does not adequately identify or analyze the full breadth of environmental impacts that can be expected to emanate from the proposed Project. Highway runoff issues I-75 specific data. Environmental engineers sampled stormwater runoff and snow melt runoff along I-75 in Cincinnati, OH and reported levels of toxic heavy metals in excess of Ohio EPA regulatory limits (Table 1). Sansalone and Buchberger (1996, 1997) noted that the composition of the runoff was affected by both the type of precipitation and the intensity of the rainfall events. [The comment includes a table with the caption: Table 1. Toxic metal concentrations measured in I-75 highway runoff (Sansalone 	The design, construction, and maintenance of the BSB Corridor Project will be in accordance with applicable water quality regulations. Although there are no current regulations based on tire particulates, ODOT and KYTC are working to improve water quality through stormwater runoff management across all projects in their respective states. In northern Kentucky, transportation projects must address the quantity of stormwater runoff by separating interstate runoff from combined sewer systems. While only runoff from new impervious area is required to be separated, KYTC will separate all interstate runoff from the BSB corridor from the existing combined sewer system. In the Cincinnati area, transportation projects must address both the quantity and quality of stormwater runoff, both by separating stormwater runoff from combined sewer systems and providing measures known as best management practices (BMPs) to reduce stormwater pollutants. The project will separate highway drainage from the existing combined sewer system in	Design Criteria (3.4) Construction Impacts (4.11) Utilities (4.12.1) Permits (4.15)



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			and Buchberger 1997. Characterization of solid and metal element distributions in urban highway stormwater. War.Sci. T~ch. Vol. 36. No. 8-9. pp. 155-160] In the subsequent decades, considerably more research has been conducted on the issue of toxics in highway runoff. These studies have documented issues related to toxic metals, particulates, and organic compounds related to vehicular traffic. [The comment cites six supporting sources.] Despite this wealth of research, the issue of toxic metals and organic compounds in highway runoff is not addressed in the SEA. There is no specific reference about which BMPs would be used to treat runoff, and there is no evidence that current methods are sufficient to reduce the risks from both metals and organic toxics. Mitigation plans described in the Supplemental Environment Assessment (p. 219) are vague and do not include quantification of stormwater pollutants, detailed descriptions of mitigation measures and their effectiveness, performance standards to verify effectiveness. The SEA promises that "The stormwater system along the BSB corridor will be completely replaced" However, plans divulged during meetings with ODOT and MSD suggest that a 150+ year-old sewer that is frequently flooded will be the primary conduit for removing highway runoff. Please see 4.12.1 Metropolitan Sewer District (MSD) for additional information on issues related to stormwater and treatment issues. Tire wear and production of toxic 6-PPD quinones. The additive 6-PPD has been used for over 40 years and "is assumed to be ubiquitous in roadway runoff." Tire wear and	Ohio, and ODOT will partner with the Metropolitan Sewer District of Greater Cincinnati (MSD) to build infrastructure to drain directly to Mill Creek and/or the Ohio River. To address water quality treatment requirements in Ohio, vegetated options for stormwater BMPs will be utilized to the maximum extent practicable. Given the dense urban land use in the project area, providing vegetative swales in the BSB corridor in Ohio would require additional impacts to surrounding properties. Therefore, the majority of the stormwater BMP treatment requirements will be addressed via off-site mitigation. In late 2022, ODOT and Ohio Environmental Protection Agency began discussions regarding providing offsite mitigation at a 1.5:1 ratio in the 1-74 median within the same watershed as Phases I and II of the BSB Corridor Project. The technical review of the offsite mitigation will be completed during detailed design, and ODOT will continue to coordinate with Ohio Environmental Protection Agency as each project phase progresses through detailed design. The existing sewer referenced by the commenter is outside the project area and owned by MSD. During detailed design, MSD will inspect and make recommendations on needed repairs for this piece of infrastructure. The required work for the separation of interstate stormwater runoff that will be incorporated into the BSB Corridor Project will be finalized during detailed design and through ongoing coordination between ODOT and MSD. MSD will continue to own and maintain this sewer. Finally, KYTC and ODOT have incorporated environmental commitments into the project that require the resident engineer and contractor to develop BMPs prior to onsite activities to ensure continuous erosion control throughout the construction and post-construction period. Best management practices for sediment and erosion control will be finalized during the project's detailed design phase. Erosion and sediment control will be managed according to the requirements of KYTC's <i>Standard Specifications</i> and ODOT	

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			environmental oxidation accelerated by ozone transforms 6-PPD in the highly reactive and toxic product 6-PPD quinone has demonstrated lethality to Coho salmon at low levels and is toxic to rainbow trout, King salmon and potentially other aquatic species. Tire particulates have been found in fish samples nationwide. [The comment cites two supporting sources.]	Material Specifications, including ODOT's Supplemental Specification 832 Temporary Sediment and Erosion Control. KYTC and ODOT will also manage erosion and sediment control through each state's permitting process for the National Pollutant Discharge Elimination System. Best management practices will also be in accordance with the most current versions of KYTC's Highway Design Guidance Manual a ODOT's Location and Design Manual, Volume 2.	
			Given that the AASHTO 2023 problem statement was submitted by ODOT staff member Tim Hill, it is inconceivable that the risks associated with tire debris and the toxic effects of 6-PPD quinone were unknown to ODOT. However, these risks are not included in either the original or Supplemental Environmental Assessment.	Impacts to water quality will also be addressed as part of the Section 401 Water Quality Certification and the National Pollutant Discharge Elimination System permitting processes.	
			Unique risks to Mill Creek. The Mill Creek, which runs parallel to I-75 in Greater Cincinnati has been considered on of the nation's most impaired waterways. Recent findings confirm that the creek is under environmental stress from numerous factors including high chloride concentrations from runoff and the impact of sewer overflows (Fig. 4)		
			[The comment includes a map with the caption: Fig. 4. Mill Creek locations of combined sewer overflows, pump station overflows and sanitary sewer overflows.]		
			These combined impacts leave the creek particularly vulnerable to additional environmental pollutants on aquatic life, particularly in key areas such as primary headwater habitat (Fig. 5)		
			[The comment includes a map with the caption: Fig. 5. Map highlighting areas along the Mill		



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			Creek which are impaired for aquatic life. PHW = primary headwater habitat.]		
			[The comment cites one supporting source.]		
		B-208-8	03/08/2024 - 4.1 Social & Economic Resources 4.1.1 Land Use Advocates for expanded access to land in Queensgate and the West End of Cincinnati (e.g. Bridge Forward) have presented alternatives that would improve connectivity to communities adversely impacted by the construction of I-75 (Fig. 2); however, their alternatives to greatly expand the amount of developable land and economic opportunities have not received due consideration. The SEA only considers training opportunities for EJ communities in the construction aspect of the Project whereas the Bridge Forward concepts would provide significantly more long-term, economic benefits to disadvantaged communities.	Refined Alternative I (Concept I-W) meets the project purpose and need, which is to improve traffic flow and level of service; improve safety; correct geometric deficiencies; and maintain connections to key regional and national transportation corridors. In addition, KYTC and ODOT have worked to incorporate several enhancements to provide additional community benefits. These include reducing the project footprint; reconfiguring the ramps in the downtown area to open up about 10 acres of additional land for potential future redevelopment or public use by the City of Cincinnati; building a wider bridge on Ezzard Charles Drive over I-75 that could support potential future civic space or retail development by the City of Cincinnati; and establishing goals for disadvantaged business enterprise participation, on-the-job training, and workforce development the progressive design-build contract.	Purpose and Need (2.) Additional Refinements (3.3) Economy and Employment (4.1.6)
		B-208-9	03/08/2024 - 4.1.2 Neighborhood and Community Cohesion The SEA (ES-Table I) perceives no impact from "limited residential displacements," parks, churches, and hospitals. How can that be? Page ES-5 lists residential and commercial relocations. How is separation of highway runoff a mitigation for taking 51.18 acres? Noise is already a concern and will increase as traffic volumes increase. Noise barriers are not a visual aesthetic and don't always reduce noise. They merely displace the energy, impacting additional areas in the corridor.	Given the limited number of residential relocations (4) and the distribution throughout the project area, the residential relocations required by Refined Alternative I (Concept I-W) are not anticipated to impact community cohesion. Ongoing acquisition activities in Kentucky and Ohio have indicated that affected businesses will be able to relocate within the same geographic area if so desired, either in existing structures or new construction. Furthermore, the businesses to be relocated do not serve unique community needs. None of the commercial relocations is expected to result in substantial job loss or economic impact. The only major employer required to relocate is the dunnhumby USA headquarters; however, in anticipation of the BSB Corridor Project, a new expanded headquarters (currently under new ownership and called	Neighborhood and Communit Cohesion (4.1.2) Travel Patterns and Access (4.1.4) Noise (4.8)



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				84.51°) has already been built about one-half mile east of its previous location. Therefore, the commercial relocations required by Refined Alternative I (Concept I-W) are not anticipated to impact community cohesion.	
				Refined Alternative I (Concept I-W) will build new and/or reconstruct existing sidewalks, shared-use paths, and bicycle lanes on local streets that are parallel to or cross I-71/I-75. These improvements will increase the options available to pedestrians and bicyclists, which will enhance community connectivity along and across the I-71/I-75 corridor.	
				KYTC and ODOT evaluated noise for Refined Alternative I (Concept I-W) in accordance with their respective state noise policies. KYTC is proposing seven noise barriers to mitigate noise impacts in Kentucky, and ODOT is proposing five noise barriers to mitigate noise impacts in Ohio. In addition, KYTC is proposing two noise/visual screening barriers to provide enhanced sound reduction in Kentucky. Public meetings and surveys will be conducted with the property owners and tenants who will benefit from noise and noise/visual screening barriers (benefitted receptors) at each location where they are proposed.	
				Refined Alternative I (Concept I-W) incorporates aesthetic enhancements, multimodal facilities, noise reduction measures, and drainage improvements that will reduce combined sewer overflows and flooding in residential areas adjacent to I-71/I-75. Given the above, Refined Alternative I (Concept I-W) is expected to result in net improvements to community cohesion throughout the project area.	
				The separation of stormwater runoff from existing combined sewer systems is not mitigation for land acquisition. In the context of neighborhood and community cohesion, the separation of stormwater runoff from existing combined sewer systems provides a	



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				community benefit due to reduced flooding and combined sewer overflows.	
		B-208-10	03/08/2024 - 4.1.7 Environmental Justice page ES-5 and ES-6 EJ 4.1.9 Disadvantaged Communities pages ES-6 ad ES-7 4.1.10 Children page ES-7 We disagree with the conclusions in Sections 4.1.7, 4.19 and 4.1.10 in their entirety. Air quality is certain to be degraded, and EJ communities, the elderly and children are already negatively impacted by traffic-related air pollution. The community has been exposed to unhealthy levels of PM2.5 and ozone for years (https://www.lung.org/media/press- releases/sota-cincinnati-fy22). The effects of this persistent pollution has been devastating. Asthma-related hospital admissions for children in Hamilton County, OH were 88 times higher in low-income neighborhoods compared with the highest income neighborhoods (Beck et al. 2013). The same study found the entire county had admission rates 2.5 times higher than the national average and more than 10 times higher than the national average in the most affected neighborhoods. These data cannot be ignored when assessing the public health impact of additional traffic through the many low-income neighborhoods along the BSB corridor already heavily impacted by PM2.5 from diesel exhaust (Figs. 6A-C) [The comment includes a map with the caption: Fig. 6A. U.S. EPA EJ map showing high concentrations of diesel particulate matter.] [The comment includes a map with the caption: Fig. 6B. OKI Long-Range Plan 2050 EJ map of Tristate poverty.]	 An Environmental Justice Analysis Report was prepared to assess the effects of Refined Alternative I (Concept I-W) on EJ populations. The EJ analysis was conducted in accordance with the U.S. Department of Transportation Order 5610.2C and FHWA Order 6640.23A, which define disproportionately high and adverse effects. The EJ analysis also followed FHWA's <i>Guidance on Environmental Justice and NEPA</i> (December 16, 2011). The analysis concluded that Refined Alternative I (Concept I-W) would result in the following effects on EJ populations: No adverse effects on community resources, access and mobility, safety, air quality, stormwater, visual setting, and workforce development; No adverse indirect and cumulative effects; and Net benefits due to mitigation and enhancements for parks and Longworth Hall; improved access, mobility, and safety for all modes of travel; reduced vehicle emissions; reduced noise; reduced flooding and combined sewer overflows; improved aesthetics; direct and indirect workforce enhancements; and an interpretive display in the West End neighborhood. Specific to air quality effects on EJ populations, evaluations considered particulate matter that is 2.5 micrometers or less in diameter (PM2.5), carbon monoxide, and ozone. The project area is in attainment with National Ambient Air Quality Standards (NAAQS) for PM2.5 and carbon monoxide, and the project is in conformance with the NAAQS for ozone. In addition, a <i>Quantitative MSAT Analysis Report (August 2023)</i> concluded that Refined Alternative I (Concept I-W) is not 	Environmental Justice (4.1.7) Socioeconomic Groups (4.1.8) Children (4.1.10)

BRENT SPENCE Public Hearing Public Comments and Responses

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			 Federal law requires highway planners to address known health disparities related to traffic-related air pollution in EJ communities. The SEA does not articulate any plan to address the existing or expected additional disparities. Nearly all comments in SEA regarding EJ issues refer for workforce development. This is grossly insufficient, since only healthy workers are likely to benefit for high-intensity construction jobs, and those jobs would only provide short-term economic benefits. The community as a whole will continue to suffer. [The comment includes a map with the caption: Fig. 6C. OKI EJ map showing concentrations of minorities in BSB corridor.] Summary of research findings regarding health disparities and traffic-related air pollution There is a wealth of scientific research identifying the health disparities associated with pollutants generated by highway traffic. A sample of the findings are summarized here to support our position that the SEA does not adequately address the increased risks to human health and the Environmental Justice issues associated with living in close proximity to heavily trafficked highways. Many of the disorders linked to traffic-related air pollution are not even mentioned in the SEA; therefore, any proposed mitigation must be considered inadequate. [The comment cites eight supporting sources.] 	 anticipated to have an appreciable impact on mobile source air toxics (MSAT) emissions. To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 nobuild, and 2050 build scenarios. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the EJ study area are expected to be substantially reduced. When the 2050 build scenario is compared to the 2050 no-build scenario, vehicle emissions throughout the EJ study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Twenty (20) percent of the census block groups with minority and/or low-income populations in the EJ study area are in Kenton County; therefore, the slightly greater level of PM2.5 when the 2050 build scenario will not be predominately borne by EJ populations nor is it appreciably more severe or greater in magnitude than the level of PM2.5 emissions for the non-EJ population. A <u>Socioeconomic Technical Report</u> was prepared to assess the effects of Refined Alternative I (Concept I-W) on several populations and groups, including older adults, individuals with limited English proficiency, adults with disabilities, and zero-car households. The analysis concluded that Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality for these populations and groups. Likewise, Refined Alternative I (Concept I-W) is not anticipated to further degrade, and may improve, overall air quality in areas utilized by children. Temporary construction-related air quality impacts in areas with EJ populations, socioeconomic populations and groups, and children are expected due to increased dust and mobile source emissions from increased traffic 	

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				congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-208-11	03/08/2024 - 4.2 Ecological Resources 4.2.4 Threatened or Endangered Species The SEA proposed mitigation does nothing to protect wetlands or wildlife in the BSB Corridor. Action is needed to protect local habitats. This is especially important given the known risks to threatened and endangered species in the area (Fig. 7) and the inability of no-car households to access nature preserves and parks great distances from their homes. [The comment includes a map with the caption: Fig. 7 Critical habitat in project corridor derived from https://gis.oki.org/er/#center= 39.08970109162804,-84.45568084716797 &zoom=12&basemap=streetsBasemap&layers =etrSpecies,streamsHabitat,streamsSpecial]	Completely avoiding wetland impacts would require shifting the I-71/I-75 mainline in Kentucky, which would substantially increase project costs and would create greater impacts to existing homes and businesses and stormwater management facilities east of the highway. Therefore, completely avoiding the wetlands was not practicable. The project includes environmental commitments that require the resident engineer and contractor to develop BMPs prior to onsite activities to ensure continuous erosion control to protect water quality throughout the construction and post-construction period, which will minimize potential for impacts to wetlands. Further avoidance and minimization efforts will be investigated during the project's progressive design-build contract, the Section 404 permitting process, and the Section 401 Water Quality Certification process. Refinements incorporated into Refined Alternative I (Concept I-W) have reduced stream impacts. Further avoidance and minimization of impacts to streams and rivers will be investigated during the project's progressive design-build contract, the Section 404 permitting process, and the Section 401 Water Quality Certification process. Permanent wetland impacts will be mitigated via the KYTC Bath County/Ova Arnett advanced mitigation site or the Kentucky Department of Fish and Wildlife Resources in-lieu fee mitigation program. Permanent stream impacts, including impacts to the Ohio River, will be mitigated via	Wetlands (4.2.1) Streams and Rivers (4.2.2) Threatened or Endangered Species (4.2.4)

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				the Licking River Mitigation Bank. Refined Alternative I (Concept I-W) will also implement best management practices for sediment and erosion control to further protect wetlands and streams.	
				Refinements incorporated into Refined Alternative I (Concept I-W) have also reduced the impacts to terrestrial habitats. The removal of up to 90 acres of forested habitat will result in the loss of potential foraging or maternity areas for the Indiana bat, the northern long-eared bat, and the tricolored bat. The removal of up to 4.38 acres of riparian habitat will result in the loss of potential foraging areas for the gray bat. Construction in the Ohio River will impact habitat for state listed mussel species. Refined Alternative I (Concept I-W) will not affect or change access to habitat areas, nature preserves, or parks.	
				Environmental commitments have been incorporated into the project to minimize and mitigate the effects on threatened or endangered species. Ohio and Kentucky follow separate policies, programmatic agreements, and regulations concerning these species; therefore, each state will incorporate separate minimization and mitigation measures for the Indiana bat, gray bat, the northern long- eared bat, little brown bat, and tricolored bat.	
				In Kentucky, the mitigation measures include providing a contribution to the Imperiled Bat Conservation Fund, which will offset project-related impacts to terrestrial habitats by acquiring and protecting forested habitat, providing habitat management and improvement, and providing focused research and monitoring efforts. Tree removal in Kentucky will be minimized, and no tree removal will occur from June 1 to July 31 when federally listed bats may be using those habitats. In addition, measures to protect stream areas in Kentucky will be implemented both during and after construction.	
				In Ohio, the mitigation measures include avoiding tree removal in excess of what is required to implement the project safely. No tree removal in Ohio will occur from April 1 through September 30, when federally and state	



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				 listed bats may be using those habitats. Ohio standards and specifications related to lighting; dust control; and water quality, wetland, and stream protection will also minimize and mitigate effects to federally and state listed bat species. Environmental commitments incorporated into the project include mussel salvage (relocation) within areas of direct impact and appropriate salvage zone buffers that will be conducted per the <i>Ohio Mussel Survey Protocol</i>. 	
		B-208-12	03/08/2024 - Floodplains - The Ohio River floods. The increased take of land means more impermeable surface and less capacity for floodwaters. Climate change indicates that flooding will increase. The SEA does not address how the community will be affected and damaged by flooding.	A regulated floodway is present along the north and south banks of the Ohio River, and piers for the new companion bridge will be constructed in the floodway. Hydraulic analyses will be completed based on the bridge type selected during the project's design-build phase to determine floodplain impacts and permitting requirements. Floodplain permits will be obtained from the City of Cincinnati and the City of Covington for impacts to the floodplain of the Ohio River before construction activities impacting floodplains/floodways occur. If the hydraulic analyses identify floodway impacts, a Conditional Letter of Map Revision/Letter of Map Revision will be obtained from the Federal Emergency Management Agency.	Floodplains (4.2.5) Permits (4.15)
		B-208-13	03/08/2024 - 4.4 Regulated Materials. How is contaminated soil and groundwater going to be addressed? What contingency plans are in place for spills during construction and from increased truck traffic through the corridor?	The project includes an environmental commitment that plan notes will be developed during detailed design for underground storage tank removal, petroleum contaminated soil and groundwater, solid waste, and abandonment of existing groundwater monitoring wells. The project also includes an environmental commitment that requires the preparation of a Spill Prevention Control and Countermeasures Plan that is acceptable to KYTC, ODOT, and the Kentucky Department for Environmental Protection. This plan will define, at minimum, protocols for the managing, handling, and disposing of oil spills, including contact with emergency response personnel, safety data sheets, and copies of agreements with agencies that would be part of a spill-response effort. The plan will also outline communication protocols to ensure	Regulated Materials (4.4) Drinking Water (4.2.7)



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			proper and timely notification of nearby public drinking water supplies in the event of a spill.	
	B-208-14	 03/08/2024 - 4.6 Air Quality We strongly disagree with the SEA conclusion of minimal and potentially improved air quality. We concur with comments submitted by the Greater Cincinnati Coalition for Transit and Sustainable Development regarding degradation of air quality and submit additional comments and documentation here. Nitrogen oxides are highly toxic and reactive gases that undergo photo-oxidation to produce ground-level ozone, which is a priority pollutant. Vehicular traffic is the primary contributor to NOx pollution (Fig. 8) The Greater Cincinnati area suffers from repeated exceedances of National Ambient Air Quality Standards, and even when levels are "moderate," those with asthma, COPD and other respiratory illnesses are at higher risk of adverse health effects. Using the same U.S. EPA MOVES data to calculate the impact of SEA traffic projections, we determined that there would be a significant increase in NOx (Table 2). [The comment includes a table with the caption: Fig. 8. Highway traffic contributes more than half of all NOx pollution, which is a major contributor to ground-level ozone.] [The comment includes a table with the caption: Table 1. Estimates of additional NOx pollution attributable to increased traffic in the BSB corridor. Assuming only 50,000 more vehicles per day, the amount of benzo[a]pyrene released in the corridor would be the equivalent of smoking 8,468,000,000 cigarettes each year. Benzo[a]pyrene (BaP) is a Group 1 carcinogen 	Air quality evaluations of Refined Alternative I (Concept I-W) considered PM2.5, carbon monoxide, and ozone. All areas in both states are currently in attainment for carbon monoxide. As such, carbon monoxide conformity requirements do not apply to transportation projects in Kentucky or Ohio, and no additional analysis related to carbon monoxide is required for Refined Alternative I (Concept I-W). In November 2022, OKI completed a regional emissions and air quality conformity analysis demonstrating that the 2021-2024 Transportation Improvement Program and 2050 Metropolitan Transportation Plan conform to all applicable USEPA approved State Implementation Plans for air quality. The BSB Corridor Project is included in OKI's air quality conforming 2021-2024 Transportation Improvement Program and 2050 Metropolitan Transportation Plan. Furthermore, the design concept and scope of Refined Alternative I (Concept I-W) have not changed substantially from what is described in the Transportation Improvement Program. Therefore, no additional transportation conformity analysis is required related to ozone for Refined Alternative I (Concept I-W). Based on the most current designations, the project area is not located in a PM2.5 nonattainment or maintenance area. As such, PM2.5 conformity requirements do not apply, and additional PM2.5 analysis is not required for Refined Alternative I (Concept I-W). KYTC and ODOT conducted a quantitative emissions analysis of nine MSAT compounds for the 2020 existing, 2050 no-build, and 2050 build scenarios using USEPA's MOtor Vehicle Emission Simulator (MOVES) and travel demand models for the project's approved certified traffic, and documented the results in a <u>Quantitative MSAT</u> <i>Analysis Report</i> (August 2023). The emissions for all	Air Quality (4.6)

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			(IARC 2018) and ranked 8 th on the U.S. government's Priority Pollutants List while the entire class of compounds (polycyclic aromatic hydrocarbons/PAHs) ranks 9 th (ASTDR 2019). The most detailed human studies used personal monitors and measurements of PAHs in cord blood to assess prenatal exposures in non-smoking women exposed to high levels of air pollution during pregnancy. Exposed children were followed through adolescence and consistently showed cognitive deficits and behavioral problems (Perera et al. 2018; 2014; 2012). Margolis et al. (2021) recently reported associations between prenatal PAH exposures and impaired performance on tests of language, spelling and math. These adverse outcomes can be exacerbated by early life stress in at-risk populations (Pagliaccio et al. 2020). Biotransformation of ingested or inhaled PAHs results in reactive metabolites that can form DNA adducts, increasing the risk of mutations leading to cancer or birth defects (Mallah et al. 2022a, Kim et al. 2013). Other adverse human health outcomes associated with PAH exposure include stunted growth in exposed children (Jedrychowski et al. 2015), metabolic syndrome (Zhang et al. 2020), immune suppression (Tooker et al. 2021, Burchiel & Luster 2001), hypertension in both adults (Wang et al. 2022) and children (Liu et al. 2022). Data from the United States National Health and Nutrition Examination Survey (NHANES) demonstrated that PAH exposures vary across ethnic groups with Hispanic and non-Hispanic Black populations at highest risk (Wang et al. 2022). [The comment cites 18 supporting sources.]	 analyzed MSAT pollutants are projected to decrease when the 2050 no-build and 2050 build scenarios are compared to the 2020 existing scenario. Eight MSAT pollutant emissions are projected to be less when the 2050 build scenario is compared to the 2050 no-build scenario. Polycyclic organic matter is anticipated to be 0.5 percent greater when the 2050 build scenario is compared to the 2050 no-build scenario. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference between the 2050 build and 2050 no-build scenarios is not considered to be significant, and Refined alternative I (Concept I-W) is not anticipated to have an appreciable impact on MSAT emissions. To further evaluate air quality considerations, KYTC and ODOT completed an emissions burdens analysis that modeled the levels of volatile organic compounds, nitrogen oxides, and PM2.5 for 2020 existing, 2050 no-build, and 2050 build scenarios using MOVES and travel demand models for the project's approved certified traffic. Refined Alternative I (Concept I-W) will improve traffic flow and reduce traffic congestion and vehicle idling in the area transportation network, which is expected to reduce vehicle emissions and improve local air quality. When the 2050 build scenario is compared to the 2020 existing scenario, vehicle emissions throughout the study area are expected to be less or approximately the same, with slightly greater levels of PM2.5 in Kenton County. Since the future scenarios are anticipated to have a substantial decrease in emissions when compared to the 2020 existing scenario, the minor difference for PM2.5 in Kenton County between the 2050 build and 2050 no-build scenario is not considered to be significant. Temporary construction-related air quality impacts are expected due to increased dust and mobile source 	

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				emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals.	
		B-208-15	 03/08/2024 - 4.7 Greenhouse Gases & Climate Change We strongly disagree with the SEA conclusion of minimal effects on greenhouse gas emissions and climate change and concur with comments submitted by the Greater Cincinnati Coalition for Transit and Sustainable Development. We submit additional comments and documentation here. The average passenger vehicle emits 4.6 metric tons of carbon dioxide a year, and transportation accounts for the largest percentage of greenhouse gas emissions (Fig. 9) [The comment includes a chart with the caption: Fig. 9. Proportion of greenhouse gases attributable to transportation and other sectors. Source: https://www.epa.gov/greenvehicles/greenhouse -gas-emissions-typical-passenger-vehicle] Using the same U.S. EPA MOVES data to calculate the impact of SEA traffic projections, we determined that the increase in greenhouse gas emissions would be substantial (Table 3). 	The evaluation of greenhouse gases and climate change prepared for the supplemental EA followed the guidance issued by the Council on Environmental Quality using methodologies discussed and in consultation with USEPA. The analysis was conducted at a quantitatively high level using USEPA's MOVES, which is USEPA's official model for state implementation plans and transportation conformity analyses and is listed by the U.S. Department of Transportation as the most common approach for modeling greenhouse gas emissions for transportation projects. KYTC and ODOT conducted an analysis that modeled the quantity of greenhouse gas emissions expected to occur in Campbell, Kenton, and Hamilton counties for the 2020 existing, 2050 no-build, and 2050 build scenarios. The greenhouse gas emissions are expected to decrease by approximately 10 percent for both the 2050 no-build and 2050 build scenarios when compared to the 2020 existing scenario. These reductions are primarily due to the implementation of the latest federal emissions standards coupled with fleet turnover. Greenhouse gas emissions are expected to the 2050 no-build	Greenhouse Gases and Climate Change (4.7)

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			Our calculations used the most favorable emission levels assuming significant reductions in emissions for all vehicle types by 2030 and current data on percentage of cars, light-duty and heavy-duty trucks on the road. Given the longevity of vehicles, it is highly likely these are gross under-estimates of the actual impact. [The comment includes a table with the caption: Table 3. Estimated carbon dioxide emissions based on traffic projections in SEA. Calculations are based on 8 miles (corridor length) * kg carbon dioxide per mile per vehicle type * 365 days] The lack of a specific plan for highway stormwater obviously does not tell us if the unknown plan will protect from flooding and be adequate to address climate change storms. The mitigation here is inadequate. ODOT and FHWA must include analysis of climate change impacts on the stormwater system. ODOT's TAMP (Transportation Asset Management Plan) and the Ohio DOT Infrastructure Resiliency Plan (referenced in the TAMP) merely suggest ODOT might need to prepare for climate change and might make some plans. The SEA lacks serious attention to the climate impact of the BSB Corridor, itself and any plans or policies to mitigate. The mitigation, page ES-11, is "project implemented in accordance with KYTC and ODOT Transportation Asset Plans", is meaningless as there are no plans to actually mitigate or create solutions to increase resiliency in the face of climate change.	condition. This is primarily due to an increase in vehicle miles of travel that will occur throughout the area transportation network as a result of Refined Alternative I (Concept I-W). In addition, the 0.7 percent difference in greenhouse gas emissions is less than the associated 1.7 percent difference in total vehicle miles of travel. Therefore, greenhouse gas emissions resulting from Refined Alternative I (Concept I-W) are expected to have minimal effects on climate change. Refined Alternative I (Concept I-W) will separate highway runoff from combined sewer systems and will address surcharging in the Peaselburg neighborhood. These measures will reduce combined sewer overflows and flooding and thereby promote climate resilience in the project area. In addition, KYTC and ODOT address issues related to climate change on a statewide level through their <i>Transportation Asset Management Plans</i> . The design, construction, and maintenance of Refined Alternative I (Concept I-W) will be in accordance with each state's <i>Transportation Asset Management Plan</i> .	
		B-208-16	03/08/2024 – 4.8 Noise Multiple commenters at the February 2024 public meetings addressed concerns about noise pollution, particularly in Northern	KYTC, ODOT, and FHWA will consider all comments received during the public comment period, including any comments pertaining to noise, prior to FHWA making a final decision on the supplemental EA. A detailed	Noise (4.8)



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			Kentucky, and asserted that proposed mitigation measures will not be adequate to avoid or even minimize the impacts of noise pollution on surrounding populations.	summary providing responses to all public and agency comments will be incorporated into the final environmental document. In addition, KYTC and ODOT will provide written responses to each participating or cooperating agency who submitted comments.	
				KYTC and ODOT evaluated noise for Refined Alternative I (Concept I-W) in accordance with their respective state noise policies. As a result of those studies, KYTC is proposing seven noise barriers to mitigate noise impacts in Kentucky, and ODOT is proposing five noise barriers to mitigate noise impacts in Ohio. Recognizing from neighborhood outreach efforts that traffic noise is a primary concern of area residents, KYTC conducted technical studies to evaluate additional noise/visual screening barriers where noise impacts were predicted but noise barriers were not warranted. Based on the technical feasibility and public comments received during outreach activities, KYTC is proposing two additional noise/visual screening barriers in Kentucky.	
				In accordance with the KYTC <i>Noise Analysis and</i> <i>Abatement Policy</i> , a noise abatement public meeting and surveys will be conducted with the property owners and tenants who will benefit from proposed noise barriers and noise/visual screening barriers during the detailed design phase of the BSB Corridor Project. In accordance with the ODOT <i>Analysis and Abatement of Highway Traffic Noise</i> <i>Policy Statement</i> , ODOT will conduct noise abatement public involvement with property owners and tenants who would benefit from proposed noise barriers in Ohio during the detailed design phases of the project.	
				Construction noise is expected to generate temporary noise impacts on adjacent and nearby properties, particularly those in residential land use. During construction, the project team has committed to incorporating proactive and reactive measures to address construction noise. This will be accomplished through equipment selection and maintenance, potential screening/shielding/barriers, scheduling of work,	



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				education of staff, and the development and implementation of the project's communication plan.	
		B-208-17	03/08/2024 - 4.9 Visual Resources 4.10 Indirect & Cumulative Effects ODOT lacks useful BMPs and therefore this mitigation is useless. ODOT and FHWA must create standard for sediment and erosion control, improve existing work practices, continuously monitor for any damages and correct the system to meet performance standards. The cumulative impacts of stormwater continuing to be sent to combined sewers throughout this project has been extremely damaging and there is no mitigation in the SEA to address that. The cumulative impacts of the ongoing environmental assaults that will continue throughout the life cycle of the Project Corridor are not being described or addressed.	 Best management practices for sediment and erosion control will be finalized during the project's detailed design phase. Erosion and sediment control will be managed according to the requirements of KYTC's <i>Standard Specifications</i>, including ODOT's <i>Construction and Material Specifications</i>, including ODOT's Supplemental Specification <i>832 Temporary Sediment and Erosion Control.</i> KYTC and ODOT will also manage erosion and sediment control through each state's permitting process for the National Pollutant Discharge Elimination System. Best management practices will also be in accordance with the most current versions of KYTC's <i>Highway Design Guidance Manual</i> a ODOT's <i>Location and Design Manual, Volume 2.</i> Both KYTC and ODOT are separating all interstate runoff in the BSB corridor from existing combined sewer systems, which will reduce combined sewer overflows in the Ohio River and Mill Creek and will result in cumulative improvements to water quality. For the supplemental EA, the horizon year for the cumulative effects assessment has been extended to 2050, which corresponds to the regional planning horizon for OKI's long-range transportation plan. The planned, programmed, and committed actions included in the cumulative effects assessment were updated based on a review of OKI's 2050 Metropolitan Transportation Plan documents. The supplemental EA concluded that Refined Alternative I (Concept I-W) would result in a minor contribution to cumulative business displacements; residential displacements; historic properties impacts; stormwater runoff; and loss of parkland, wetlands, streams, and threatened and endangered species habitat. Based on the evaluation of direct impacts contained in the supplemental EA, Refined Alternative I (Concept I-W) will improve community cohesion, improve traffic flow and 	Cumulative Effects (4.10.2) Construction Impacts (4.11) Utilities (4.12.1)



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				safety for all modes of travel, provide additional economic opportunities, improve air quality, abate noise, improve aesthetics, and reduce flooding and storm sewer overflows, which will offset negative cumulative effects resulting from Refined Alternative I (Concept I-W). Given the above, when considered with other past, present, and reasonably foreseeable projects, Refined Alternative I (Concept I-W) is expected to result in a minor contribution to cumulative impacts.	
		B-208-18	03/08/2024 - 4.11 Construction The SEA does not address stormwater and under the existing FONSI has not properly managed dust, erosion and sediment, air pollution or stormwater.	Temporary construction-related air quality impacts are expected due to increased dust and mobile source emissions from construction equipment and increased emissions from increased traffic congestion during construction. Environmental commitments have been incorporated into the project to minimize and mitigate temporary construction impacts. Temporary air quality effects will be minimized by following federal, state, and local regulations regarding dust and emission controls. In addition, KYTC and ODOT will develop and implement a dust control plan and an ambient air quality monitoring program for sensitive areas in the corridor, including areas utilized by children and other sensitive land uses such as schools, parks and recreation areas, and hospitals. Construction activities such as removing vegetation and soil may cause increased erosion and sedimentation. Erosion and sediment control will be managed according to the requirements of KYTC's <i>Standard Specifications</i> , including ODOT's SS <i>832 Temporary Sediment and Erosion Control.</i> KYTC and ODOT will also manage erosion and sediment control through each state's permitting process for the National Pollutant Discharge Elimination System.	Construction Impacts (4.11)
		B-208-19	03/08/2024 - 4.12 Utilities & Railroads 4.12.1 Metropolitan Sewer District (MSD) Background	The project will be designed, constructed and maintained with applicable stormwater requirements. In the Cincinnati	Environmental Justice (4.1.7)



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			Historically, Metropolitan Sewer District (MSD) has allowed extensive connections from stormwater pipes and inlets to combined sewer pipes as well as piping creeks directly into combined sewer pipes. Sanitary sewers have also been allowed to take in stormwater and extensive inflow and infiltration exists across the sewer shed. The impact of roads and highways (all impermeable) discharging stormwater into combined sewers is a major part of the Metropolitan Sewer District's (MSD) high volume of stormwater, requiring both collection and treatment at the Waste Water Plants. Some efforts have been made to limit stormwater going into the combined system. Or temporarily allowing stormwater to be separated and but then still going back into the combined system (Hopple Street and Martin Luther King interchange). Moreover, significant materials (debris, metal, vehicle parts, road salt and other pollutants) accumulate along roadways which are not swept or cleared before rainfall. The environmental impact of highway and road stormwater runoff going into local rivers includes large amounts of untreated sewage and highway pollutants. The burden of these environmental impacts is borne by the MSD ratepayers, especially in consent decree projects, waste water treatment and backup of sewage and stormwater going onto residents and business's property and backing up basements. The whole community is also adversely affected by ongong poor water quality. The impact of climate change to heavy (high volume, intense rainfall) localized flooding is critical to both preventing flooding on 1-75 and also addressing impacts of stormwater	area, transportation projects must address both the quantity and quality of stormwater runoff, both by separating stormwater runoff from combined sewer systems and providing BMPs to reduce stormwater pollutants. ODOT and MSD have held multiple coordination meetings to discuss drainage design. The stormwater system along the BSB corridor in Ohio will be completely replaced, and the new system will be designed to meet current ODOT standards. The project will separate highway drainage from the existing combined sewer system in Ohio, and ODOT will partner with MSD to build infrastructure to drain directly to Mill Creek and/or the Ohio River. To address water quality treatment requirements in Ohio, vegetated options for stormwater BMPs will be utilized to the maximum extent practicable. Given the dense urban land use in the project area, the majority of the stormwater BMP treatment requirements will be addressed via off-site mitigation. In late 2022, ODOT and Ohio Environmental Protection Agency began discussions regarding providing offsite mitigation at a 1.5:1 ratio in the I-74 median within the same watershed as Phases I and II of the BSB Corridor Project. The technical review of the offsite mitigation will be completed during detailed design, and ODOT will continue to coordinate with Ohio Environmental Protection Agency as each project phase progresses through detailed design. The existing McClean sewer referenced by the commenter is outside the project area and owned by MSD. During detailed design, MSD will inspect and make recommendations on needed repairs for this piece of infrastructure. The required work for the separation of interstate stormwater runoff that will be incorporated into the BSB Corridor Project will be finalized during detailed design and through ongoing coordination between ODOT and MSD. MSD will continue to own and maintain this sewer. Best management practices for sediment and erosion control will be finalized during the project's detailed design phase. Erosion and sediment control will be	Socioeconomic Groups (4.1.8) Construction Impacts (4.11) Utilities (4.12.1) Public Involvement and Agency Coordination (5.) Environmental Commitments (Section 6. and ES-Table II)

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ID	Name	No.	Commentpollutants and flow into rivers and streams. As the impacts of climate change increase the region will be less able to cope with the volume of polluted water and what should be a resource to provide water during drought will not be of adequate water quality.The history of shifting the burden of stormwater pollution continues to be harmful to environmental justice communities, and includes no vehicle households. No vehicle household pay for overflow pollution costs partly through sewer fees, even though they do not drive. These burdens have been going on for years.Inadequacies of the SEA The Supplemental Environmental Assessment does not adequately address numerous aspects.• the adverse legacy issue of poor/non- existent/detrimental stormwater management stormwater management seen to date in the I- 75 widening/BSB Project• stormwater pollution control consistent with addressing current impacts and future requirements, such that the waters of the region are not polluted by highway runoff • erosion from high volume discharges	Responseaccording to the requirements of ODOT's Construction and Material Specifications, including ODOT's Supplemental Specification 832 Temporary Sediment and Erosion Control. ODOT will also manage erosion and sediment control through the permitting process for the National Pollutant Discharge Elimination System. Best management practices will also be in accordance with the most current version of ODOT's Location and Design Manual, Volume 2. Highway spills during the operation of the project following the construction period will be managed according to existing policies and procedures. ODOT will own and conduct maintenance of interstate drainage and stormwater infrastructure after work is completed as part of its normal operating procedures. The maintenance of the BSB Corridor Project will be in accordance with statewide practices and ODOT's Transportation Asset Management Plan. ODOT's Transportation Asset Management Plan includes inventory and/or inspection solutions to actively manage post-construction BMPs, which are storm water structural elements designed to reduce pollution caused by precipitation runoff.An Environmental Justice Analysis Report was prepared to assess the effects of Refined Alternative I (Concept I-W) on low-income and minority (EJ) populations. The analysis concluded that Refined Alternative I (Concept I-W) would not result in adverse stormwater effects in EJ communities.	Reference ¹
			 impacts of the ODOT proposal for separating stormwater and preventing it from entering the combined sewer system from the immediate footprint of the highway and the sewersheds the Project goes thru. The specifics of "separation of highway stormwater runoff" are left to some future design and lacks information on what the principles and requirements that the possible future design would include. The lack of 	A <u>Socioeconomic Technical Report</u> was prepared to assess the effects of Refined Alternative I (Concept I-W) on several populations and groups, including zero-car households. The analysis concluded that Refined Alternative I (Concept I-W) would have no stormwater impacts for zero-car households. The final NEPA decision for the BSB Corridor Project will include a final, comprehensive list of environmental commitments incorporated into the project, including	
			specificity is so extreme that the Project would not necessarily separate all the stormwater runoff from the highway. The SEA refers only to	environmental commitments related to stormwater. Per 23 CFR § 771.109(b)(1), KYTC and ODOT, in	

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			 "reduce flooding and combined sewer overflows". Elimination of stormwater-caused combined sewer overflows is essential and well as protecting the community from flooding on the interstate. There is no mention of highway spills during the future use of the highway (only construction spills are mentioned) that will be conveyed to communities and the environment if not captured and treated. BMPs for stormwater management and water quality are undefined. BMPs will only be those in the ODOT manual. ODOT's BMPs and ODOT's MS4 permit both lack performance standards, monitoring to ensure compliance and requirements to make any necessary changes to ensure performance standards are met. Stormwater and sediment management during construction has been poor to date. Construction at Sharon Rd and I-75 left drivers dealing with dirt and dust and muddy runoff for weeks. The NB Mitchell Avenue Exit still has landslides that should never have happened. During construction stormwater has escaped Jersey barriers and dumping volumes of muddy water on the highway and erosion along the adjacent hillside. Far better planning and monitoring needs to be built into the project, rather than leaving it up to "the resident engineer and contractor." Unknown amounts of dirt have been discharged to Mill Creek and the air during construction. Off-site mitigation will not address the inadequacy of discharging polluted stormwater into Mill Creek and the Ohio River adjacent to the Project. Leaving mitigation to some vague future plan does not tell us how this proposed mitigation will perform, how it will be or require modifications if performance standards are not met, how much pollution will actually be 	 cooperation with FHWA, are responsible for implementing mitigation measures stated as commitments in the supplemental EA and the final environmental decision documents unless FHWA approves of their deletion or modification in writing. FHWA will ensure that this is accomplished as a part of its stewardship and oversight responsibilities. The BSB Corridor Project has been designated a Major Project by FHWA. As such, Title 23 of the United States Code section 106(h)(2) requires the development of a <i>Project Management Plan</i>. For more information about <i>Project Management Plan</i>, please visit: https://www.fhwa.dot.gov/majorprojects/pmp/index.cfm. KYTC, ODOT, and FHWA have developed a <i>Project Management Plan</i> for the BSB Corridor Project, which will be updated as the project phases advance. Among other items, the <i>Project Management Plan</i> establishes protocols for environmental compliance monitoring. Per the BSB Corridor <i>Project Management Plan</i>, ODOT and KYTC will meet all commitments and project-specific mitigation and enhancement items included in the project's environmental clearance. The ODOT project managers for the Phase I, II, and III contract will track and enforce implementation of the environmental compliance with the environmental decision documents. Compliance with the environmental mitigation and enhancement commitments for the BSB Corridor Project will be evaluated and documented at the conclusion of the final design and construction phases of each contract. The project mitigation measures and environmental commitments (including permits) will be reviewed at the pre-construction staff, and the contractors. The BSB Corridor Project will be reviewed during construction by ODOT's district staff and KYTC's district staff to ensure that the mitigation measures and environmental 	

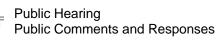
Public Hearing Public Comments and Responses

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			 removed from the receiving stream if mitigation is done and how does that compare to the pollution from stormwater entering the Ohio and Mill Creek currently. The SEA states that "ODOT will partner with MSD to build infrastructure to drain directly to Mill Creek and/or the Ohio River." Details are lacking and proposals we have heard about are insufficiently developed and agreed to. ODOT has a plan to install a pump station and build a collector pipe to the Ohio River. Few details are known about this plan. In short, the MSD proposal for a new stormpipe to go to the very old McLean sewer (condition unknown) and then to the Ohio River or Mill Creek, requires removal of sanitary line inputs, (partial separation) from the McLean sewer. The McLean sewer would then have modifications to take the sanitary sewage north and then west to the Wastewater Treatment Plant (WWTP) and the then south direction storm-only McLean sewer section would go to the Ohio River or Mill Creek (Fig. 10) [The comment includes a map with the caption: Fig. 10. Proposed plans to divert stormwater from I-75 into aging McLean Sewer.] Numerous questions remain about which project will be selected and the impact of various liabilities and costs. which entity would be the owner of the project pieces, who maintains the assets into the future, the condition of the McLean sewer. It is over 150 years old in some sections (Fig. 11) and some sections have never been assessed and other sections have never been assessed for years, who rehabilitates any sections in poor condition & who pays, 	 commitments are carried out and to determine if additional mitigation measures and environmental commitments are needed. In addition, monthly status reports submitted to FHWA will include updates on mitigation measure and environmental commitment monitoring and status. KYTC and ODOT have conducted extensive public involvement during the development of the BSB Corridor Project, as documented in the <i>Public Involvement Summary (January 2024)</i>. Efforts have included: updating the project website; establishing social media accounts; distributing e-newsletters; conducting 12 small-scale and 4 broad-scale targeted environmental justice/neighborhood outreach meetings; and holding 2 open-house style project update meetings. Members of the public were also provided the opportunity to review the supplemental EA, attend in-person and virtual public hearings, and provide comments to KYTC and ODOT during the 30-day public availability period. Appendix D of the <i>Public Involvement Summary</i> includes a tabulation of outreach efforts, including meetings between ODOT and the Sierra Club to discuss the project approach to stormwater on September 8, 2023 and October 19, 2023. KYTC and ODOT have evaluated and responded to all comments. Public involvement will continue to occur during the design of Refined Alternative I (Concept I-W) has been refined in several locations in direct response to public comments. Public involvement will continue to act as liaisons to the communities immediately affected by the project. ODOT has met with MSD on several occasions to discuss potential stormwater outfalls using existing MSD facilities. 	



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	Name		 who will separate sanitary sewage from the McLean storm-only sewer in that sewershed, who pays for that, can stormwater actually go to the Ohio River during high water, who puts in pollution control, pays for it and maintains it into the future – including addressing any new stormwater regulations. ODOT's Transportation Asset Management Plan (TAMP) does not address stormwater management assets other than culverts and inlets. The TAMP does not address stormwater management assets, constructed wetlands, water reuse, etc). How will ODOT manage any non-gray BMP infrastructure? There is no real benefit-cost analysis of the two options (ODOT's and MSDs) for addressing stormwater (Figs. 11 and 12) [The comment includes a map with the caption: Fig. 11. Illustration showing age of McLean sewer sections.] [The comment includes a map with the caption: Fig. 12. Proposed plan to divert stormwater into Mill Creek; report 10e-level-1-ecological-survey only talks about Ohio River and species. It is not a pollution-related report that would include impacts of toxic stormwater runoff. 	Response FHWA has addressed all comments received from federal cooperating agencies.	Kelerence
			 the project has been lacking. Information about stormwater management has been lacking and difficult to get. Decisions appear to have been made, or delayed without consideration of public input. Another example of this is the US EPA letter to Laura S. Leffler from David Ogulei, Acting 		



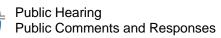


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			NEPA Supervisor Tribal and Multi-media Programs Office, Office of the Regional Administrator, Preliminary Supplemental Draft Environmental Assessment for the Brent Spence Bridge Corridor Project, Covington, Kenton County, Kentucky, and Cincinnati, Hamilton County, Ohio was not available to the public until the SEA was released. The letter states "Our recommendations address purpose and need, alternatives analysis, appropriate level of NEPA analysis, air quality, noise, vibrations, light impacts, EJ, outreach to unhoused populations, relocation, impacts from demolition, roadside vegetation and vegetative barriers, children's environmental health impacts, climate change, stormwater management, water quality and aquatic life use impacts, pollinators and native plant species, and mitigation." The recommendations in the letter have not been addressed by the SEA.		
		B-208-20	03/08/2024 - What Must be Done to Correct the Flawed SEA Regarding Stormwater and Sewers ODOT and FHWA must immediately establish the City of Cincinnati and Hamilton County, in an open, public manner, as cooperating agencies. While this is out of the sequence and process of Project, many of the flaws in the SEA could have been addressed during this process.	The City of Cincinnati, the Hamilton County Engineer, and the Hamilton County Regional Planning Commission are participating agencies for the BSB Corridor Project. All cooperating and participating agencies were notified of the opportunity to offer feedback on the supplemental EA during the public availability period, and individual responses will be prepared for any comments received from participating and cooperating agencies. Points of contact for Hamilton County have already been established through its membership on the BSB Corridor Project Advisory Committee and its status as a participating agency during the environmental process. As part of its commitment to ongoing coordination with local agencies, ODOT will work with Hamilton County to establish appropriate timeframes to schedule meetings to further discuss stormwater measures that are being developed in conjunction with MSD. ODOT anticipates these meetings will occur during the plan development for Phases I and II and during the proof-of-concept and	Local Agency Coordination (5.2) Participating & Cooperating Agencies (5.4) Ongoing Public & Stakeholder Involvement (5.6)



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				project development portions of the Phase III progressive design-build project.	
				KYTC and ODOT will continue to coordinate with the Project Advisory Committee and appropriate local city, county, planning, and transit agencies throughout the procurement, final design, and construction phases of the project.	
		B-208-21	03/08/2024 - ODOT and FHWA must be fully transparent about the Project. ODOT and FHWA must release any and all additional documents in its possession and allow for public comment.	The supplemental EA and the supporting documents that are incorporated by reference are posted on the " <u>Documents</u> " page of the project website.	N/A
		B-208-22	 03/08/2024 - ODOT and FHWA have not complied with US EPA Stormwater Management recommendations in the letter to Leffler. We list these for your convenience. Since storm frequency and intensity have increased over the decades and are projected to continue to escalate due to climate change, stormwater systems should be designed to store, retain, and infiltrate a greater volume of runoff in the project area. For instance, detention areas should be sized to accommodate larger storm events. Where roads cross rivers and streams, uncontrolled stormwater runoff can erode banks and transport sediment into waterways. Excessive sediment loads alter the specific water quality and habitat characteristics fish populations and other biological communities need for survival. Implement appropriate stormwater and erosion control best management practices during and after construction to control erosion associated with construction activities and to minimize stormwater impacts to affected waterbodies. Provide more details and include more stringent measures to minimize erosion 	USEPA is a federal cooperating agency for the BSB Corridor Project. FHWA has addressed all comments received from federal cooperating agencies. All cooperating and participating agencies have been notified of the opportunity to offer feedback on the supplemental EA during the public availability period, and individual responses will be prepared for any comments received from participating and cooperating agencies.	Participating & Cooperating Agencies (5.4)





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			 and associated water quality impacts during construction. EPA reiterates its 2012 recommendation that the forthcoming NEPA document identify specific measures, beyond silt fences, that FHWA will use to ensure the standard specifications and special provisions will be successfully implemented by construction contractors in a timely manner. FHWA should consider using a variety of stormwater management practices often referred to as "green infrastructure" or "low impact development" practices. For more information, see https://www.epa.gov/green-infrastructure. See also EPA's Adaptation Resource Center for information on resiliency and adaptation measures. EPA reiterates its 2012 recommendation that the forthcoming NEPA document clarify the projected volume of runoff and contaminant loads. FHWA should determine whether the levels of contaminants – especially soluables such as road salt and metals – will reach acute or chronic levels for intolerant aquatic life species. For instance, studies show mussel glochidia can experience chronic and acute adverse effects from increases in chloride To reduce or avoid stormwater impacts, EPA recommends capturing and pretreating stormwater runoff from the low-permeability surfaces of this project. The forthcoming NEPA document should quantify this polutant reduction and discuss the associated benefits to aquatic life uses. 		

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			friendly plants within the proposed project's right-of-way. • Describe the specific terms of mitigation to demonstrate that such measures will offset known impacts from the project. For instance, the EA should include the wetland mitigation ratio and whether fee-in-lieu projects will be conducted in the same watershed. • Commit to mitigation measures and associated monitoring and maintenance arrangements, including a list of entities that will manage proposed mitigation measures. escribe the specific terms of mitigation to demonstrate that such measures will offset known impacts from the project. For instance, the EA should include the wetland mitigation ratio and whether fee-in-lieu projects will be conducted in the same watershed. • Commit to mitigation measures and associated monitoring and maintenance arrangements, including a list of entities that will manage proposed mitigation measures and associated monitoring and maintenance arrangements, including a list of entities that will manage proposed mitigation measures.		
		B-208-23	 03/08/2024 - The Clean Water Act requires our waterways to be fishable and swimmable. There are numerous studies showing the adverse impacts from stormwater pollution. The studies in listed in the footnote and their references are only a small subset of the studies that have been done, yet ODOT lacks any performance standards for a project that will likely still be operating 100 years from now. Recent studies have shown the extensive problem of PFAS type families of chemicals, microbeads, and others to be of concern and should not continue to be ignored. ODOT Stormwater Management Program's Annual Report exemplifies the lack of attention to stormwater pollution. ODOT's Stormwater 	The design, construction, and maintenance of stormwater infrastructure will be in accordance with applicable laws, policies, and procedures. Impacts to water quality will also be addressed as part of the Section 401 Water Quality Certification and the National Pollutant Discharge Elimination System permitting processes. Per the BSB Corridor <i>Project Management Plan</i> , ODOT and KYTC will meet all commitments and project-specific mitigation and enhancement items included in the project's environmental clearance, including those related to stormwater. The ODOT project managers for the Phase I, Phase II, and Phase III contracts and the KYTC project manager for the Phase III contract will track and enforce implementation of the environmental commitments listed in the supplemental EA and the final environmental decision documents.	Utilities (4.12.1) Permits (4.15) Environmental Commitments (Section 6. and ES-Table II)

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			Management Program is wholly inadequate to address stormwater pollution. ODOT and FHWA must address each of the above information needs and the actions to mitigate and stop the damage from all stormwater pollution, including historic pollution, and describe specific performance standards, not just use the limited BMPs in ODOT's manual, that will be used, not just during construction but also throughout the ongoing operation of the I-75/BSB corridor. This information and proposed actions need to be made available for public comment. This work cannot wait until the design phase.	The BSB Corridor Project will be reviewed during construction by ODOT's district staff and KYTC's district staff to ensure that the mitigation measures are carried out and to determine if additional mitigation items are needed. In addition, monthly status reports submitted to FHWA will include updates on environmental commitment monitoring. Information regarding compliance with the project's environmental commitments will be made publicly available at appropriate milestones during the design and construction of the Phase I, Phase II, and Phase III contracts.	
			ODOT must stop stormwater discharges to combined sewers.		
			ODOT and FHWA must implement a stormwater pollution removal system with specific performance standards (including the impact of "first flush" of pollutants), ongoing monitoring and procedures for modifying these controls if performance standards are not met. This work cannot wait until the design phase.		
			ODOT and FHWA must address the historic legacy of discharging highway discharges into combined sewer systems and remove highway stormwater from the combined or sanitary sewer system, and treat the stormwater pollution to specific performance standards, before it is discharged to anybody of water. ODOT and FHWA must have open discussion and comment with the public about the overall stormwater management system.		
			ODOT and FHWA must follow the Council on Environmental Quality Guidance on Mitigated FONSI. ODOT and FHWA must get an agreement with the MSD, Cincinnati, Board of Hamilton County Commissioners and the public		



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			on the stormwater management and pollution treatment for the entire project.		
			ODOT and FHWA must consider the BSB project as a 100-year project. The decisions made about this project will continue to impact this region for a century. We must be forward looking in protecting the environment and public health in our decision making. Putting the burden of stormwater runoff costs and pollution on the ratepayers of Hamilton County is unjust and must be ended through this project and the past legacy costs to Hamilton County ratepayers must be mitigated. Spills on highways must also be addressed as		
			part of stormwater pollution and mitigation.		
			[The comment cites four supporting sources.]		
		B-208-24	03/08/2024 - 4.12.2 Railroads The Project must be designed to accommodate future light rail projects and/or streetcar usage.	The project has not incorporated passenger rail into the design because it is not supported by the project's purpose and need, and there are no current plans for new	Purpose and Need (2.)
				rail in the region. New passenger rail facilities would need to be evaluated as part of a separate project. The transit component included in the Initiative must be developed and championed regionally, and KYTC and ODOT are ready to support this when it is advanced at a regional level.	Public Hearing (5.5)
				In consideration of feedback provided by the City of Cincinnati Department of Transportation and Engineering, ODOT will design and construct the non-deck components for the new Ezzard Charles Drive bridge over I-75 to not preclude potential future streetcar route expansion. The design modification will not change the footprint or the environmental impacts of the project.	
		B-208-25	03/08/2024 - 4.13 Section 4(f) Properties Can impacts to parks be avoided or further mitigated?	As documented in the supplemental EA, Refined Alternative I (Concept I-W) has avoided and minimized impacts to publicly owned parks. Proposed mitigation	Section 4(f) (4.13)



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				measures for unavoidable impacts to public parks are compensatory to the impact to the properties.	
		B-208-26	03/08/2024 - 4.13.5 Longworth Hall Is it necessary to demolish part of Longworth Hall?	Avoidance alternatives for Longworth Hall were evaluated in the supplemental EA. The avoidance evaluation did not identify any measures to further reduce impacts on Longworth Hall.	Avoidance Alternatives (4.13.14)
		B-208-27	03/08/2024 - CONCLUSION Thank you for this opportunity to comment on the Supplemental Environmental Assessment for the proposed Brent Spence Bridge Project. The Sierra Club Miami Group has advocated for sustainable transportation solutions in Hamilton County and Northern Kentucky for decades, and we have followed this proposed Project since its inception. We are deeply disappointed in the conclusions reached in the 2012 FONSI, and we have demonstrated that a thorough review of the scientific literature and other relevant documents and data do not support the conclusions of the 2024 SEA. We urge you to follow both the letter and spirit of NEPA which would require a complete Environmental Impact Statement to ensure that all concerns raised in this document and those submitted by the organizations Bridge Forward and the Greater Cincinnati Coalition for Transit and Sustainable Development are appropriately and thoroughly addressed prior to construction.	The supplemental EA has been prepared consistent with 23 CFR §§ 771.129 and 771.130. All of the environmental studies prepared for the 2012 EA have been reexamined and updated to meet current state and federal requirements. Subject matter experts were involved in the preparation of the studies completed in the preparation of the supplemental EA. The analysis documented in the supplemental EA has not identified any significant effects resulting from Refined Alternative I (Concept I-W). As described in 40 CFR § 1508.9, one purpose of environmental impact statement or a finding of no significant impact. FHWA will make the final NEPA determination based on the information and analyses presented in the supplemental EA.	Introduction (1.)

1. Column provides reference to section(s) within the revised supplemental EA (May 2024) that are related to the comment using the following format: Section Title (Section Number).

