

Brent Spence Bridge Replacement/Rehabilitation Project



Determination of Effects Report

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1.0 INTRODUCTION

This report presents the Determination of Effects report for historic properties located within the project Area of Potential Effects (APE) for the Brent Spence Bridge Replacement/Rehabilitation Project. The proposed project is intended to improve the operational characteristics within a 7.8-mile segment of Interstate 75 within the Commonwealth of Kentucky (state line mile 186.7) and the State of Ohio (state line mile 2.7).

The Phase I and II History/Architecture investigations for this project were conducted from June 2007 to July 2010. These investigations identified 37 historic properties within the project APE that are listed in or eligible for inclusion in the National Register of Historic Places (NRHP). Of these, 12 already were listed in the NRHP and 25 were determined to be eligible for inclusion in the NRHP. The recommended preferred alternative, Alternative I, was reviewed in order to assess effects associated with this alternative option on these 37 historic resources. The assessment of effects utilized the criteria of adverse effect defined in 36 CFR 800.5(a)(1).

The proposed undertaking will have an adverse effect on two of these properties: NRHP 86003521, the B&O Railroad Freight Terminal/Longworth Hall, located in Ohio and NRHP 93001165, the Lewisburg Historic District, located in Kentucky.

2.0 DESCRIPTION OF UNDERTAKING

Interstate 75 (I-75) within the Greater Cincinnati/Northern Kentucky region is a major thoroughfare for local and regional mobility. Locally, it connects to I-71, I-74, and US Route 50. The Brent Spence Bridge provides an interstate connection over the Ohio River and carries both I-71 and I-75 traffic. The bridge also facilitates local travel by providing access to downtown Cincinnati, Ohio, and Covington, Kentucky. Safety, congestion, and geometric problems exist on the structure and its approaches. The Brent Spence Bridge, which opened to traffic in 1963, was designed to carry 80,000 vehicles per day. Currently, approximately 160,000 vehicles per day use the Brent Spence Bridge and traffic volumes are projected to increase to 200,000 vehicles per day in 2035.

The I-75 corridor within the Greater Cincinnati/Northern Kentucky region is experiencing problems, which threaten the overall efficiency and flexibility of this vital trade corridor. Areas of concern include, but are not limited to, growing demand and congestion, land-use pressures, environmental concerns, adequate safety margins, and maintaining linkages in key mobility, trade, and national defense highways.

The I-75 corridor has been the subject of numerous planning and engineering studies over the years and is a strategic link in the region's and nation's highway network. As such, the Ohio Department of Transportation (ODOT) and the Kentucky Transportation Cabinet (KYTC), in cooperation with the Federal Highway Administration (FHWA), are proposing to improve the operational characteristics of I-75 and the Brent Spence Bridge in the Greater Cincinnati/Northern Kentucky region through a major transportation project.

2.1 Purpose and Need

The purpose of the Brent Spence Bridge Replacement/Rehabilitation Project is intended to improve the operational characteristics within the I-71/I-75 corridor for both local and through traffic. In the Greater Cincinnati/Northern Kentucky region, the I-71/I-75 corridor suffers from congestion and safety-related issues as a result of inadequate capacity to accommodate current traffic demand. The objectives of this project are to:

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

2.2 Development of Alternatives

Development of conceptual alternatives for the Brent Spence Bridge was initiated in 2003 by KYTC. These initial alternatives were documented in the *Feasibility and Constructability Study of the Replacement/ Rehabilitation of the Brent Spence Bridge* (Feasibility and Constructability Study) (May 2005). This report recommended a series of potential feasible build alternatives for replacement and/or rehabilitation of the Brent Spence Bridge structure and improvement to its approaches and surrounding transportation system. Six conceptual alternatives were recommended for further study.

In 2006, 25 conceptual alternatives, including the No Build Alternative, were developed in Step 4 of ODOT's Major Project Development Process (PDP). These 25 conceptual alternatives included the six alternatives from the Feasibility and Constructability Study. The 25 conceptual alternatives were evaluated using a two-phased screening process based on a comparative analysis. Phase one of the analysis was an evaluation of the conceptual alternatives based on the goals of the purpose and need and comments received from local governments. In phase two of the analysis, the conceptual alternatives that were not eliminated in phase one were evaluated using stakeholder goals and measures of success; design compatibility with the I-75 Mill Creek Expressway Project (HAM-75-2.30) to the north; and concurrence among government agencies obtained through a series of meetings. Some alternatives were combined into hybrid alternates and then evaluated in phase two of the analysis.

The two-phased comparative analysis eliminated 19 of the 25 conceptual alternatives from further study and evaluation. These 19 conceptual alternatives failed to meet the purpose and need goals of the project and did not adequately address the stakeholder's goals and measures of success. Additionally, these alternatives would not be compatible with the I-75 Mill Creek Expressway Project (HAM-75-2.30). Five travel lanes were needed to provide a seamless connection between the two projects.

The *Planning Study Report* (September 2006) documented the 25 conceptual alternatives and the two-phased comparative analysis. At the end of Step 4 of the PDP, a total of six conceptual alternatives, the No Build and five mainline build alternatives were recommended for further study in Step 5 of the PDP. The No Build Alternative was retained as a baseline for evaluation of the Build Alternatives. The No Build Alternative consists of minor, short-term safety and maintenance improvements to the Brent Spence Bridge and I-75 corridor, which would maintain continuing operations. The five mainline alternatives recommended for further study in the *Planning Study Report* were:

- Mainline Alternative 1 - Queensgate Alignment for I-75
- Mainline Alternative 2 - Queensgate Alignment for I-71/I-75
- Mainline Alternative 3 - New Bridge Just West for I-75
- Mainline Alternative 4 - New Bridge Just West for all Traffic
- Mainline Alternative 5 - Construct New Bridges for I-75

A variety of sub-alternatives were developed to provide options for key intersection and traffic flow areas within the project corridor. The various sub-alternatives accommodated the design requirements of the mainline alternatives:

- I-75 Northbound at KY 1120/12th Street Ramp Sub-Alternatives
- I-71/US 50 Interchange Sub-Alternatives (for I-75 Queensgate Alignment)
- I-71/I-75/US 50 Interchange Sub-Alternatives
- I-75 Ohio Collector-Distributor Road/Arterial Improvement Sub-Alternatives
- Western Hills Viaduct Interchange Sub-Alternatives

The five mainline alternatives and sub-alternatives were further developed in more detail and refined during Step 5 of the PDP. These efforts included environmental studies, traffic analysis, refinement of horizontal and vertical alignments, cost estimates, utilities coordination, and stakeholder coordination. As a result, the mainline alternatives and sub-alternatives from Step 4 as presented in the *Planning Study Report* evolved into

eight conceptual alternatives. The eight conceptual alternatives were identified as Alternatives A through H:

- Alternative A (Alternative 1, I-71/US 50 Interchange Sub-Alternative 1, Hybrid of Collector-Distributor Roads Sub-Alternative 1 and Arterial Improvements Sub-Alternative 2 from the Planning Study Report)
- Alternative B (Alternative 2, I-71/US 50 Interchange Sub-Alternative 2, Hybrid of Collector-Distributor Roads Sub-Alternative 1 and Arterial Improvements Sub-Alternative 2 from the Planning Study Report)
- Alternative C (Variation of Alternative 3, I-71/I-75/US 50 Interchange Sub-Alternative, 1, Hybrid of Collector-Distributor Roads Sub-Alternative 1 and Arterial Improvements Sub-Alternative 2 from the Planning Study Report)
- Alternative D (Variation of Alternative 3, I-71/I-75/US 50 Interchange Sub-Alternative 3, Hybrid of Collector-Distributor Roads Sub-Alternative 1 and Arterial Improvements Sub-Alternative 2 from the Planning Study Report)
- Alternative E (Variation of Alternative 3, I-71/I-75/US 50 Interchange Sub-Alternative 3, Hybrid of Collector-Distributor Roads Sub-Alternative 1 and Arterial Improvements Sub-Alternative 2 from the Planning Study Report)
- Alternative F (Variation of Alternative 4, I-71/I-75/US 50 Interchange Sub-Alternative 2, Hybrid of Collector-Distributor Roads Sub-Alternative 1 and Arterial Improvements Sub-Alternative 2 from the Planning Study Report)
- Alternative G (Variation of Alternative 4, I-71/I-75/US 50 Interchange Sub-Alternative 3, Hybrid of Collector-Distributor Roads Sub-Alternative 1 and Arterial Improvements Sub-Alternative 2 from the Planning Study Report)
- Alternative H (Alternative 5 from the Planning Study Report)

2.2.1 Recommended Feasible Alternatives

The *Conceptual Alternatives Study* (April 2009) from Step 5 recommended feasible alternatives for further study in Steps 6 and 7.

Three of the mainline alternatives, Alternatives A, F, and H, were eliminated in the early stages of Step 5 of the PDP. Alternatives A and H were eliminated from further consideration due to fatal flaws, which were identified as the alternatives were developed in more detail. Alternative F was eliminated from further consideration because it was very similar to Alternative G and did not provide any additional benefit.

Alternative B was initially developed as an alternative to mitigate Section 4(f) impacts. However, based on the adverse impacts to communities and property acquisition associated with Alternative B, as well as the overall complexity, constructability, risk, and cost, it was eliminated from further consideration in the PDP.

A combination of Alternatives C and D was recommended as a feasible alternative. Alternative E was also recommended to be developed for further study in Step 6 as a feasible alternative.

Alternatives C and D are very similar in overall design. Based on the comparative analysis in Step 5, with respect to horizontal and vertical alignments, impacts, and the flow of traffic of Alternatives C and D, it was determined that a hybrid alternative of the northbound portion of Alternative C and the southbound portion of Alternative D be

advanced for further consideration. It was recommended to increase the number of lanes for I-75 to three lanes in each direction to support the improved level of service this alternative will provide.

The Alternative E recommendation was based on the access provided to Covington and Cincinnati and the minimal amount of community impacts in comparison to the other alternatives. It was recommended to increase the number of lanes for I-75 to three lanes in each direction to support the improved level of service this alternative will provide.

Alternative G was recommended to be eliminated from further consideration due to the high costs, and residential and business displacements associated with this alternative. However, based on the analyses completed and feedback as part of community input, the following beneficial design features of Alternative G were carried forward for further analysis and incorporated into the feasible alternatives:

- access to north end of Clay Wade Bailey Bridge from I-75 southbound using a collector-distributor roadway and US 50 eastbound;
- two access points into Covington;
- access from a northbound collector-distributor roadway from Kentucky to I-71 northbound in Ohio; and
- access ramp just north of Ezzard Charles Drive for Freeman Avenue and local traffic to I-75 northbound.

2.2.2 No Build Alternative

The No Build Alternative consists of minor, short-term safety and maintenance improvements to the Brent Spence Bridge and I-75 corridor, which would maintain continuing operations all within existing right-of-way.

The No Build Alternative does not meet the purpose and need for this project. This alternative does not improve traffic flow and existing congestion will worsen. The No Build Alternative does not provide improvements for safety. Lane widths would remain and the lack of shoulders on the bridge would continue. Geometric deficiencies would not be corrected. The No Build Alternative would maintain existing connections to local, regional, and national transportation corridors but does not improve these connections.

The No Build Alternative is retained as a baseline alternative to compare with the feasible Alternatives.

2.2.3 Feasible Alternatives

The *Conceptual Alternatives Study* recommended two feasible alternatives for further study in Steps 6 and 7 of the PDP. The two feasible alternatives consist of Alternative E and of a combination of Alternatives C and D, with certain design elements of Alternative G incorporated, currently identified as Alternative I. At the beginning of Steps 6 and 7 the combination of Alternatives C and D was identified as Alternative C/D. KYTC and ODOT determined that this name was too similar to the acronym for a collector-distributor (C-D) roadway and was creating confusion. Therefore, the name of the combined alternative was changed to Alternative I in keeping with the alphabetical nomenclature of the project alternatives.

In Steps 6 and 7 the feasible alternatives were developed in more detail, which included refinement of vertical and horizontal geometries, elimination of design exceptions, and connections to the local roadway network. Connections and improvements to local roads included adding travel lanes and turn lanes, which increased the right of way limits of both feasible alternatives. The recommendations from Step 5 were also incorporated into the design of the feasible alternatives. One recommendation was to increase the number of lanes on I-71/I-75 from four to six and to add full width shoulders along the mainline. This design change also increased the right of way limits of both feasible alternatives.

The following sections describe the alignment and design features of Alternatives E and I based on the engineering refinements completed in Steps 6 and 7.

2.2.3.1 Alternative E

Alternative E utilizes the existing I-71/I-75 alignment from the southern project limits at the Dixie Highway Interchange north to the Kyles Lane Interchange. The Dixie Highway and Kyles Lane interchanges will be modified slightly to accommodate a collector-distributor roadway, which will be constructed along both sides of I-71/I-75 between the two interchanges. North of the Kyles Lane Interchange, the alignment shifts to the west to accommodate additional I-71/I-75 travel lanes. Between Kyles Lane and KY 1120/12th Street, six lanes will be provided in each direction for a total of 12 travel lanes.

Near KY 1120/12th Street, the northbound alignment separates into two routes; one for interstate traffic and one for a local collector-distributor roadway. Between Pike Street and KY 9th Street, the interstate separates into I-71 and I-75 only routes. The collector-distributor roadway will carry local traffic northbound and provide access to Covington at KY 1120/12th and 5th streets and access from KY 9th and 4th streets. The southbound collector-distributor roadway will carry traffic from Ohio over I-71/I-75 and provide access to both the interstate and into Covington at KY 9th Street.

A portion of Crescent Avenue will be closed with a new connection to Bullock Street. Access from Covington for southbound interstate traffic is located at KY 1120/12th Street. Bullock Street will be extended north from Pike Street to KY 9th, 5th, and 4th streets and Jillians Way will be extended north from Pike Street to KY 9th and 5th, and 4th streets. Bullock Street and Jillians Way will function as one way pair local frontage roadways.

A new double deck bridge will be built just west of the existing Brent Spence Bridge to carry northbound and southbound I-71 and I-75 traffic. On the upper deck, I-71 southbound will have three lanes and I-71 northbound will have two lanes. On the lower deck, I-75 will have three northbound and three southbound lanes. The existing Brent Spence Bridge will be rehabilitated to carry northbound and southbound local traffic with two lanes in the southbound direction and three lanes in the northbound direction.

In Ohio, Alternative E reconfigures I-75 through the I-71/I-75/US 50 Interchange and eliminates some of the existing access points along I-75. Existing ramps to I-71, US 50, and downtown Cincinnati will be reconfigured. The existing direct connections between I-75 to westbound and from eastbound US 50 will be maintained in Alternative E. US 50 will be reconfigured to eliminate left-hand entrances and exits. The OH 5th Street overpass will be eliminated and the 6th Street Expressway will be reconfigured as a two-

way, six-lane elevated roadway with a new signalized intersection for US 50 access and egress. Access between southbound I-71 (Fort Washington Way) and northbound I-75 will be provided near OH 9th Street as a direct connection. Both I-75 southbound and US 50 (6th Street Expressway) will have access to northbound I-71 (Fort Washington Way).

A local collector-distributor roadway will carry local traffic northbound from the existing Brent Spence Bridge and provide access to OH 2nd, 5th, and 9th streets, Winchell Avenue and access from OH 4th Street before reconnecting to I-75 just south of the Linn Street overpass. The northbound ramps from OH 6th and 9th streets to I-75 will be removed requiring traffic from these points to utilize a new local roadway parallel to I-75 and access the interstate at Bank Street. Southbound I-75 traffic will separate from the local collector-distributor roadway near Ezzard Charles Drive. The southbound collector-distributor roadway will carry traffic over I-75 to OH 7th Street, allowing traffic to either access downtown at 7th Street, travel south to OH 5th and 2nd streets, or travel across the existing Brent Spence Bridge into Covington. Access to the local southbound collector-distributor roadway will be provided at Western Avenue and at OH 4th and 8th streets.

Alternative E also improves Western and Winchell avenues to facilitate traffic flow and increase capacity. The ramps to Western Avenue and from Winchell Avenue just north of Ezzard Charles Drive will be removed. The ramp from Freeman Avenue to I-75 northbound and the ramp from I-75 southbound to Freeman Avenue will remain. Between Ezzard Charles Drive and Western Hills Viaduct, southbound I-75 will have six lanes; northbound I-75 will have five lanes. The Western Hills Viaduct Interchange will be reconfigured to provide a full movement interchange. The improved interchange will be a single point urban interchange (SPUI) design.

2.2.3.2 Alternative I

Alternative I was developed at the beginning of Steps 6 and 7 as a combination of Alternatives C and D with certain design elements of Alternative G and six travel lanes (Exhibits 1 and 2). Alternatives C and D were very similar in overall design. Based on the comparative analysis in Step 5, with respect to horizontal and vertical alignments, impacts, and the flow of traffic of Alternatives C and D, it was determined that a hybrid alternative of the northbound portion of Alternative C and the southbound portion of Alternative D be advanced for further consideration in Steps 6 and 7. It was also recommended at the end of Step 5 to increase the number of lanes for the I-71/I-75 mainline to three lanes in each direction to support the improved level of service this alternative will provide.

Alternative I utilizes the existing I-71/I-75 alignment from the southern project limits at the Dixie Highway Interchange north to the Kyles Lane Interchange. The Dixie Highway and Kyles Lane interchanges will be modified slightly to accommodate a collector-distributor roadway, which will be constructed along both sides of I-71/I-75 between the two interchanges. North of the Kyles Lane Interchange, the alignment shifts to the west to accommodate additional I-71/I-75 travel lanes. Between Kyles Lane and KY 1120/12th Street, six lanes will be provided in each direction for a total of 12 travel lanes. Near KY 1120/12th Street, the alignment northbound separates into three routes for I-71, I-75 and a local collector-distributor roadway.

In Alternative I, access into Covington from the interstate will be provided by the local collector-distributor roadway; at KY 1120/12th Street for northbound traffic and at KY 5th and 9th streets for southbound traffic. Access from Covington for northbound traffic will be provided by a ramp located between Pike Street and KY 9th Street from Jillians Way. The ramp will provide direct access to I-71 from Covington and provide access to I-75 northbound using the collector-distributor roadway through downtown Cincinnati and connecting at the merge near Ezzard Charles Drive. Access from Covington will also be provided at KY 4th Street to the northbound collector-distributor roadway. Access from Covington for southbound interstate traffic is located at KY 1120/12th Street. Bullock Street will be extended north from Pike Street to KY 9th, and 4th streets and Jillians Way will be extended north from Pike Street to KY 9th and 5th streets. Bullock Street and Jillians Way will function as one way pair local frontage roadways.

A new double deck bridge will be built just west of the existing Brent Spence Bridge to carry northbound and southbound I-75 (three lanes in each direction), two lanes for southbound I-71 and three lanes for southbound local traffic. The existing Brent Spence Bridge will be rehabilitated to carry two lanes for northbound I-71 and three lanes for northbound local traffic.

Alternative I reconfigures I-75 through the I-71/I-75/US 50 Interchange and eliminates all access to and from I-75 from KY 1120/12th Street to the Freeman Avenue overpass in the northbound direction. Alternative I eliminates access to I-75 southbound between the Freeman Avenue exit and KY 9th Street. Alternative I also eliminates access from I-75 southbound between the US 50/6th Street overpass and Kyles Lane.

In Ohio, a local collector-distributor roadway will be constructed along both sides of I-75. The local northbound collector-distributor roadway will carry local traffic from the existing bridge and provide access ramps to OH 2nd Street, I-71 northbound, US 50 westbound, OH 5th Street, and Winchell Avenue before reconnecting to I-75 just south of Ezzard Charles Drive. The northbound ramps from OH 4th Street will utilize the new local northbound collector-distributor roadway for access to I-75. The northbound ramps from OH 6th and 9th streets to I-75 will be removed requiring traffic from these two points to utilize a new local roadway parallel to I-75 connecting to Winchell Avenue and access the interstate at Bank Street. The southbound collector-distributor roadway begins near the Ezzard Charles Drive overpass and carries both downtown Covington and Cincinnati traffic. The southbound collector-distributor roadway will provide access to OH 7th, 5th and 2nd streets, as well as connecting to access ramps from Western Avenue, OH 9th Street, and US 50 eastbound. The collector-distributor roadway will continue south over the new bridge into Covington.

Between Ezzard Charles Drive and the Western Hills Viaduct, northbound I-75 will have five lanes and southbound I-75 will have six lanes, for a total of 11 travel lanes. The ramps to Western Avenue and from Winchell Avenue just north of Ezzard Charles Drive to the interstate will be eliminated. The southbound ramp to Freeman Avenue and the northbound ramp from Freeman Avenue to I-75 will remain. Alternative I also improves Western and Winchell avenues to facilitate traffic flow and increase capacity. Ramps to Western Avenue and from Winchell Avenue will be provided around the Western Hills Viaduct Interchange, which will be reconfigured to be a tight urban diamond design.

2.3 Recommended Preferred Alternative

Alternative I is the recommended preferred alternative. Both Alternatives E and I would provide greater operational improvements over the No Build Alternative due to the operations provided by their design and the capacity expansion of the additional lanes for the freeway mainline. While both feasible alternatives are better operationally than the No Build Alternative, their design, connection points and operations are different from each other.

The design features of Alternative I would provide a better freeway system from the traffic operations perspective compared to Alternative E. Alternative I contains only one location where the level of service is below level of service (LOS) D. This location is northbound I-71, where I-71 is restricted to two travel lanes and the LOS is E. Alternative E contains six freeway locations (four in Kentucky and two in Ohio) where the level of service is either LOS E or LOS F.

In Kentucky, Alternative I would provide a direct connection to KY 5th Street in Covington in the southbound direction, which Alternative E would not. Alternative E would provide a direct ramp connection in Covington to northbound I-71 and I-75. Alternative E would provide a ramp connection from the northbound C-D roadway to KY 5th Street.

In Ohio, Alternative I's design is based on a collector-distributor system, which provides free-flow movements. For example, Alternative I would provide a direct connection by way of a collector-distributor system in Ohio to northbound I-75 and I-71, which is free-flow. Alternative E's design is based on a service road system, which provides interrupted flow due to four signalized intersections.

The primary differences between Alternatives E and I in Kentucky are that in the southbound direction, motorists in Alternative I can exit to KY 5th Street, but cannot in Alternative E. In the northbound direction motorists for Alternative E have a direct ramp access connection to I-71 and to I-75, but in Alternative I they only have direct access to I-75.

Alternatives E and I have similar impacts to ecological resources, community resources, hazardous material sites, and utilities. While the feasible alternatives have similar property impacts, Alternative I would require less impact on the human environment through fewer residential and business relocations and require slightly less acreage for right-of-way. Both feasible alternatives would be compatible with existing land use plans, would support the Queensgate redevelopment plans, and help Cincinnati facilitate its economic renewal goals. Alternatives E and I differ in their impacts to Section 4(f) resources. In Kentucky, Alternative I would have a less direct physical impact to both Goebel Park and the Lewisburg Historic District than Alternative E. In Ohio, Alternative E impacts three Section 4(f) resources and Alternative I impacts to two. Given the potential to mitigate impacts to the Queensgate Playground and Ball Fields under Alternative I to the extent that recreational features and attributes are not substantially affected, Alternative I would have less overall impact to Section 4(f) resources. Overall, the impacts to Section 4(f) resources caused by Alternative E are more extensive than Alternative I.

Alternative I is recommended as the Preferred Alternative with the inclusion of the Western Hills Viaduct tight urban diamond interchange. This recommendation is based on the design features, local access features, traffic operations, estimated costs, and environmental impacts.

2.4 Bridge Design

KYTC's Bridge Type Selection Process was conducted for the new Ohio River Bridge to select the best design for the new Ohio River crossing. The results of this study are presented in the *Bridge Type Selection Report* (February 2011). The Bridge Type Selection Process is a three step process, which involves developing and analyzing numerous bridge concepts leading to a recommendation of three final bridge type alternatives. The following sections describe the Bridge Type Selection Process.

2.4.1 Step 1

The first activity of the Bridge Type Selection Process was a meeting with the Project Aesthetics Committee. On September 25, 2009, the project team met with the Aesthetics Committee to identify key visual and aesthetic criteria, which would be used to assist with evaluating bridge concepts developed during Step 1. Five key visual and aesthetic criteria were developed as a result of the Project Aesthetics Committee meeting. The five key criteria were:

- The new bridge should be visually attractive.
- The new bridge should be visible looking "through" the existing bridge (from the east).
- As much as possible, crossing the new bridge should allow views of the surrounding context (unlike existing bridge).
- The new bridge should have distinctive characteristics that identify it as a local landmark.
- The new bridge should have a visual relationship with the existing bridge.

A total of 24 bridge concepts were developed during Step 1. Through a series of meetings, the FHWA, ODOT, and KYTC identified 12 bridge concepts which met the purpose and needs of the project. These bridge concepts consisted of two truss bridges, three arch bridges and seven cable-stayed bridges.

2.4.2 Step 2

The 12 bridge concepts were presented to a combined meeting of the Project Aesthetics Committee and Project Advisory Committee on January 29, 2010. During the meeting, the bridge concepts which best met the five key visual and aesthetic criteria were identified. Additionally, various bridge components which could be incorporated into the 12 bridge concepts were presented. The 12 bridge concepts were posted on the project website to solicit public comment as well.

A one-week comment period followed the January 29th meeting, which provided the public an opportunity to comment on the 12 bridge concepts. Comments were received via email, faxes, phone calls, and postings to the project website. The comments were analyzed and used to quantify the trends in the public's preferences and concerns regarding the overall project and the various bridge concepts. Based on the results of

the January 29th meeting and the public comments received, six preliminary bridge alternatives were recommended for further study in Step 3 of the process:

1. Arch Bridge: simply supported arch with inclined arch ribs,
2. Arch Bridge: continuous arch with vertical arch ribs,
3. Cable-stayed Bridge: two towers, three vertical legs/tower,
4. Cable-stayed Bridge: two towers, three inclined legs/tower,
5. Cable-stayed Bridge: two towers, two inclined legs/tower, and
6. Cable-stayed Bridge: one tower, two vertical legs/tower.

2.4.3 Step 3

The six preliminary bridge type alternatives were presented to a combined meeting of the Project Aesthetics Committee and Project Advisory Committee on April 15, 2010. As part of the presentation, the ways in which each of the six preliminary bridge type alternatives met the key design criteria established for the bridge type selection process were discussed. The ways in which the six preliminary alternatives met the five key visual and aesthetic criteria developed by the PAC during Step 1 were also discussed.

The six bridge type alternatives were posted on the project website to solicit public comments. Additionally, a press release was issued to notify the public of the opportunity to provide comments on the alternatives. A one-week comment period followed the April 15th meeting, which provided the committee members and the public an opportunity to comment on the six bridge type alternatives. Comments were received via email, faxes, phone calls, and postings to the project website. The public comments received were analyzed and used to quantify trends for the public's preferences and concerns regarding the overall project and for the various bridge concepts.

A comparative analysis was completed for the six preliminary bridge type alternatives with respect to construction cost; constructability/construction time; maintenance and durability; major rehabilitation feasibility; maintenance of traffic; and public comment. Based on this comparative analysis, it was recommended that Alternatives 1, 3, and 6 be the Final 3 Bridge Alternatives and advance for additional technical analysis as part of Step 3 of the Bridge Type Selection Process. The reasons for the selection of these three bridge type alternatives are discussed below.

Alternative 1 was recommended to proceed through Step 3 of the Bridge Type Selection Process because it offers the lowest construction cost (\$490 million based upon Step 2 cost estimates) of all bridge type alternatives, and it was well regarded by the public via the input received from the project website and a poll by the Cincinnati Chamber of Commerce. The construction of the Ohio River crossing is on the overall project's critical path for construction. Alternative 1 has the shortest construction time of 2.5 to 3 years compared to 3.5 to 4 years for the other five bridge type alternatives.

Alternative 3 was recommended to proceed through Step 3 of the Bridge Type Selection Process because it offers the second lowest construction cost (\$570 million based upon Step 2 cost estimates), which is the lowest of the cable-stayed alternatives. Alternative 3 was well regarded by the public via the input received from the Project Aesthetics Committee and Project Advisory Committee, the project website, and the Cincinnati Chamber of Commerce poll. From the drivers' point of view, the three needle towers are

well proportioned and the vertical towers are more traditional and straightforward than the inclined tower bridge type alternatives.

Alternative 6 was recommended to proceed through Step 3 of the Bridge Type Selection Process because it is the most visible of the bridge type alternatives, especially from Cincinnati and Covington and it would serve as a landmark for the region. From the drivers' point of view, the tall and well proportioned twin-needle towers would serve as a gateway entrance to Cincinnati and Covington. This alternative was highly regarded by the public via the input received from the Cincinnati Chamber of Commerce poll, the Project Aesthetics Committee, and Project Advisory Committee. While the construction cost (\$620 million based upon Step 2 cost estimates) is the third highest of all the Bridge Type Alternatives, it is only 1.6 percent (\$10 million) higher than the fourth highest.

Upon selection and approval by FHWA, KYTC and ODOT of the Final 3 Bridge Alternatives, the project team assessed the suitability of each alternative based on more detailed examination of the structural requirements, cost, constructability, environmental impacts, aesthetics, and other key criteria. This assessment included performing significant preliminary design, preparing revised cost estimates, and preparing additional renderings for the Final 3 Bridge Alternatives.

While each of the Final 3 Bridge Alternatives has distinct characteristics, there are some elements common to all. The following is a list of these common elements:

- A bridge alignment adjacent to, and just downstream (west) of, the existing Brent Spence Bridge,
- A double-decked truss superstructure carrying two roadways on each deck, with each roadway composed of two or three 12-foot-wide lanes and two 14 foot-wide shoulders,
- An approximately 1,000-foot main span with piers outside of the main span piers of the existing Brent Spence Bridge,
- A river to superstructure clearance no lower than that of the existing Brent Spence Bridge, and
- A bridge to work in conjunction with the existing Brent Spence Bridge, to carry the Design Year 2035 traffic.

The technical analysis for the Final 3 Bridge Alternatives was presented to the Project Advisory Committee on December 17, 2010. To date, no additional comments have been received from the Project Advisory Committee.

2.5 Final 3 Bridge Alternatives

The Final 3 Bridge Alternatives are discussed in more detail below. Photo-simulations of each the Final 3 Bridge Alternatives are located in Appendix B of this report. The selection of the new Ohio River Bridge will be determined following the public hearings for the Brent Spence Bridge Replacement/Rehabilitation Project.

2.5.1 Final Bridge Alternative 1 – Tied Arch

Alternative 1 consists of a 1000-foot main span, three rib tied arch with a crown height of approximately 200 feet and a double deck truss system with a top and bottom deck

width of approximately 155 feet and 180 feet, respectively. The crown height allows for more slender, aesthetically pleasing arch ribs. The arch ties consist of three 38-foot deep trusses each located at the base of the arch ribs. Both the top and bottom truss chords carry approximate equal tension forces and provide some redundancy to the tie system. The tied arch hangers are connected to the arch ribs at the top and anchored into the truss top chords at the bottom.

The deck trusses serving as the arch ties are made continuous over the main span river piers in order to eliminate a deck joint at the spring points of the arch. To balance the horizontal forces created by the arch ribs, the top and bottom truss chords are large. In contrast, the truss diagonals are relatively small, allowing optimal visibility of the surrounding area to those driving along the bottom deck. The outer truss planes are inclined to match the slope of the outer arch ribs, providing a visually pleasing effect to those driving over the bridge, as well as to those observing from shore. The arch ribs and the deck truss chords feature architectural reveals which evoke a slender appearance to the structure and are intended to reference some of the region's prominent art deco landmarks such as Union Terminal and Carew Tower.

2.5.2 Final Bridge Alternative 3 – Two Tower Cable Stayed (3-Needle-Tower)

Alternative 3 consists of a two towered cable-stayed bridge, with each tower composed of three 335-foot tall needles and a 1000-foot main span. Each tower needle carries a plane of stay cables which in turn support a truss at the top deck level. The deck system consists of an approximately 172-foot wide double-decked, triple-trussed superstructure. The cables and truss diagonals are inclined at the same angle, which provides a smooth visual transition from the light cables to the relatively bulkier truss. In addition, the diagonals help distribute the horizontal force of the cables into the top and bottom chords of the trusses, where that load can then be carried in part by the concrete deck. This feature maximizes the efficiency of the superstructure.

At the towers, the trusses are integrally connected to the concrete needles. This connection has two main advantages. First, it minimizes the overall width of the bridge, an important consideration with historic structures to both the east and west of the span. Second, the integral truss/tower connection eliminates the requirement for costly tower bearings, which would require periodic replacement.

This alternative's clean geometry is defined by crisp, simple lines. The harp-strung cables afford drivers unfettered views of the region's other Ohio River bridges and the downtowns of Cincinnati and Covington. This bridge's austere design also serves as a counterpoint to the complicated geometry of other bridges along the riverfront without overcomplicating the downtown skyline.

2.5.3 Final Bridge Alternative 6 – Single Tower Cable Stayed (2-Needle-Tower)

Alternative 6 consists of a single tower cable stayed bridge with an approximately 1023-foot main span. The single tower is composed of two 500-foot tall needles supporting an approximately 155-foot wide double-decked truss superstructure via two planes of doubled cables, which connect to the top chord of the edge trusses. The trusses

distribute the horizontal cable load evenly to the top and bottom deck of the superstructure, a structurally efficient means of carrying these forces.

As on Alternative 3, the trusses of Alternative 6 are designed to be integral with the towers, which eliminates the necessity for a truss bearing at the tower, while also minimizing the width of the bridge.

The tower of the bridge will be one of the tallest structures on the riverfront, and will be visible from vantages on both sides of the river, despite the adjacent truss bridges upstream (east) between the new bridge location and the downtowns of Cincinnati and Covington.. As such, this bridge alternative will serve as a landmark, updating the skylines of both Cincinnati and Covington with its simple geometry producing a monumental structure.

2.5.4 Visual Impacts of Bridge Alternatives 1 and 3 on Cultural Resources

The potential viewshed of a new bridge was established for cultural resources through a computer generated viewshed analysis that identified areas currently having a view of the Brent Spence Bridge. This analysis relied solely upon available topographic data and did not consider the height and location of buildings and vegetation that may restrict views. Therefore, field investigations were conducted to verify the results of the computer analysis.

The Kentucky Heritage Council's (KHC) initial request for delineation of a viewshed Area of Potential Effects (APE) stemmed from their concern about the possible visual effects of the proposed new bridge upon historic properties in downtown Covington, particularly the John Roebling Suspension Bridge, and upon the hillsides of West Covington. The project team determined, after delineation of the viewshed APE, that the potential visual effects associated with construction of a new bridge are not significant enough to warrant intensive survey to identify all National Register of Historic Places (NRHP)-eligible properties that may be located within the viewshed APE. It is important to note that bridges have been a part of the landscape in this area since construction of the John Roebling Suspension Bridge in 1867. The subsequent construction of the C&O Railroad Bridges (Kentucky Resource KEC 107) in the 1880s, and the Brent Spence Bridge in the early 1960s serves to reinforce the fact that for more than 100 years bridges have constituted a major landscape feature in the area. Construction of a new bridge does not represent the introduction of an intrusive new element into the landscape, as it might if a new bridge were proposed in a locale that had never had a bridge. Additionally, construction of a new bridge will not alter any of the characteristics of historic properties that qualify them for inclusion in the NRHP in a manner that would diminish the integrity of any property's location, design, setting, materials, workmanship, feeling, or association. Consequently, efforts to locate historic properties within the viewshed APE have been limited to the identification of properties previously listed in the NRHP. In a letter dated May 2, 2007, KHC concurred with Kentucky Transportation Cabinet-Division of Environmental Analysis (KYTC-DEA) and FHWA that areas east of the proposed project corridor will have a limited or obstructed view of the proposed undertaking (the letter is included in Appendix C).

Bridge Alternatives 1 and 3 are somewhat taller than the current Brent Spence Bridge. However, KHC agreed that the increase in bridge height would not necessarily represent a significant alteration of the landscape.

2.5.5 Visual Impacts of Bridge Alternative 6 on Cultural Resources

Bridge Alternative 6 is significantly taller than the current Brent Spence Bridge. If built, the two-needle-tower of the design will represent the third tallest structure in the area. KHC suggests if this alternative is chosen as the preferred design, a more thorough examination of the potential effects on the viewshed would be necessary.

3.0 MEASURES TO MINIMIZE HARM INCORPORATED INTO DESIGN

Per 36 CFR 800.6, findings of adverse effect to historic properties require that efforts to resolve such effects by developing and evaluating alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects must be undertaken. Throughout the project development process measures to minimize harm to historic resources were incorporated into the design of the alternatives. This effort resulted in direct impacts to two historic resources listed in the National Register of Historic Places (NRHP), Longworth Hall (NRHP 86003521) in Ohio and the Lewisburg Historic District (NRHP 93001165) in Kentucky.

A Retaining Wall Justification report was completed in May 2011 (electronic copies of the reports are included with this report on CD). The report was prepared in conformance with the Ohio Department of Transportation (ODOT) Bridge Design Manual, Section 204.6 and the ODOT Location and Design Manual, Volume 3, Section 1404.2. The purpose of this study is to justify the need for and compare the practicality, constructability, and economics of different types of retaining wall systems or grading at various locations along this corridor. The construction of retaining walls along the southern end of the project APE will avoid the need for taking any historic properties in this area. Retaining walls will vary in height and length based on the landscape. Retaining walls will have no adverse effect on historic properties where the area's steep topography will shield the walls from view. The retaining walls will also not have adverse effects in areas where they will be visible from historic properties because these properties already have direct views of the highway that compromise their integrities. Additionally, six-foot tall fences are located in these areas to mark the boundary of the interstate right of way. Therefore, introducing a different visual element to the viewshed will not visually impact historic properties.

Impacts to Longworth Hall could not be avoided throughout the development and design of the alternatives. Therefore, measures were taken to minimize direct impacts to Longworth Hall. For Alternative I, the alignment was shifted to the east as much as possible. This resulted in the need for a design exception for the ramp from I-71 southbound/US 50 westbound to the southbound collector-distributor roadway located north of the Dunhumby Building. This ramp was designed for a speed of 35 miles per hour (mph), which violates the minimum design standard of 45 mph, therefore requiring a design exception. In order to avoid the design exception and use a flatter curve radius, the ramp would have extended farther to the west. This would have resulted in an additional 30 feet of impact to Longworth Hall.

Additionally, the southbound collector-distributor roadway and the ramp from US 50 eastbound were designed to connect into the ramp from I-71 southbound/US 50 westbound to the southbound collector-distributor roadway alignment as soon as possible so that the acceleration lanes could be tied into the lower deck of the new Ohio River Bridge. This design provided narrow right of way limits for Alternative I, which further reduced impacts to Longworth Hall.

The Lewisburg Historic District is in very close proximity to I-71/I-75, therefore impacts to the district could not be avoided throughout the development and design of the alternatives. The design of Alternative I limited impacts to the historic district as much as

possible. For example, ramp access from the interstate system was configured in a manner to reduce impacts to the district by combining geometric connections which required less property impacts. Improvements to Pike Street were also redesigned to avoid impacts to historic properties on the south side of the street. Retaining walls along I-71/75 adjacent to the Lewisburg Historic District will further reduce the amount of right of way required from the district. Retaining walls will also allow Crescent Avenue to remain open to provide access to the district.

The Access Point Study conducted in 2010 and 2011, determined that improvements were needed on Pike Street in Covington to accommodate future traffic volumes. The improvements to Pike Street include widening and adding turn lanes west of Jillians Way under I-71/I-75 and widening and realigning Pike Street through the intersection with Jillians Way continuing eastward eventually tapering into the current design of Pike Street east of Philadelphia Street. The improvements to Pike Street east of Jillians Way resulted in impacts to two additional historic properties adjacent to the south side of Pike Street: KECL 817 Boehmer Decorating Company, 533-535 Pike Street and the adjacent KECL 864 C&C Mortuary Service, 511-519 Pike Street. Both properties are eligible for listing in the NRHP for their associations with the NRHP-listed Bavarian Brewing Company (NRHP 96000281). Resource KECL 817 was the company's office building and KECL 864 was used as a garage during the brewery's period of significance. To avoid impacts to these two historic properties, the design of the Pike Street improvements was revised to remain within the current Area of Potential Effects (APE). Six lanes are proposed between Bullock Street and Jillians Way under I-71/I-75 for Pike Street, which include four turn lanes and two through lanes. There will be one through lane on Pike Street which passes under I-71/I-75 east crossing Jillians Way. This merge shifts eight feet north through the intersection with Jillians Way and realigns with existing Pike Street east of the intersection. The southern existing curb line of Pike Street will remain in place. These design changes reduced the width of right of way needed for Pike Street improvements east of Jillians Way, which avoided impacts to KECL 817 Boehmer Decorating Company, 533-535 Pike Street and to KECL 864 C&C Mortuary Service, 511-519 Pike Street.

4.0 MEASURES TO MINIMIZE HARM DURING CONSTRUCTION

Construction of the Brent Spence Bridge Replacement/Rehabilitation Project is anticipated to begin in 2014 and be complete by 2022. This section describes the potential conceptual construction phasing of the recommended preferred Alternative I. There would be no construction impacts with the No Build Alternative.

4.1 Construction Phasing Plan

A conceptual construction phasing plan and maintenance of traffic plan were developed for the recommended preferred alternative to maintain traffic operations throughout the corridor and minimize disruption to the surrounding communities. Due to the complexity of the work and the large volume of traffic that utilizes the I-71/I-75 corridor, it was imperative to create a construction sequencing plan that minimizes disruption to interstate traffic. The needs for road closures, detours, temporary widening, and temporary roadways to maintain traffic flow were determined. The phasing plan presented in this section is one possible scenario based on many assumptions. These assumptions included the creation of several contract packages for each state as listed below.

Kentucky:

- I-471 Widening and Ramp Modifications
- Kyles Lane Bridge Replacement
- Dixie Highway Bridge Replacement
- New Bridge over the Ohio River
- I-75 Reconstruction from MP 187.2 to MP 189.5
- I-75 Reconstruction from MP 189.5 to the Southern Termini of the KY 1120/12th Street Interchange
- I-75 Reconstruction from the South Termini of the KY 1120/12th Street Interchange to the New Bridge over the Ohio River and Existing Brent Spence Bridge
- Rehabilitation of the Existing Brent Spence Bridge

Ohio:

- I-71/ I-471 Ramp Modifications
- Linn Street Bridge Replacement and Gest Street Reconstruction
- Ezzard Charles Drive Bridge Replacement; Western Avenue Reconstruction; Freeman Avenue Interchange Reconstruction; Winchell Street Reconstruction; 9th Street Northbound Entrance Ramp; and the Court Street Cul-de-sac Construction
- 7th/8th/9th Street Interchange Reconstruction and the 6th Street Northbound Entrance Ramp
- I-75 Reconstruction from Findlay Street to the Northern Terminus of the Corridor and the Western Hills Viaduct Interchange Reconstruction
- I-75 Reconstruction from North of Linn Street to Findlay Street
- I-75 Reconstruction from the New Bridge Over the Ohio River and the Existing Brent Spence Bridge to North of Linn Street

Prior to beginning construction along the I-75 corridor, maintenance of traffic (MOT) construction for the I-75 project along I-471 would be performed. The I-471 MOT construction involves the modification of the ramps to I-71 and I-471, as well as improvements along I-471, to support I-75 detours and lane shifts in later phases. As part of the detour for the I-75 corridor reconstruction, I-71 traffic would be diverted to I-471 utilizing I-275 in Kentucky.

The first phase of construction along I-75 includes replacement of overpass bridges (i.e., Kyles Lane Bridge, Dixie Highway Bridge, Linn Street Bridge, Ezzard Charles Drive Bridge, Liberty Street Bridge, Findlay Street Bridge) to accommodate the widening of I-71/75 during later phases. The overpass bridges can be designed and constructed quickly, with minimal disruption to existing I-71/I-75 traffic. The first phase of construction in Kentucky also includes roadway widening between Kyles Lane and Dixie Highway to the east, the roadway widening between Dixie Highway and KY 1120/12th Street to the west, and new roadway construction between KY 1120/12th Street and the Ohio River along the outside of the interstate mainline. The first phase of construction in Ohio also includes widening the roadway to the east and west between the US 50 Interchange and Findlay Street. Due to the construction duration of the new Ohio River Bridge, construction would begin on the new bridge during this phase.

The second phase of construction in Kentucky includes roadway widening to the west between Kyles Lane and Dixie Highway, new ramp connections to Kyles Lane and Dixie Highway, roadway construction between Dixie Highway and KY 1120/12th Street along the east side of the interstate mainline, and some additional roadway work north of KY 1120/12th Street. In Ohio, the second phase of construction would include the ongoing widening construction from the first phase between the US 50 and Ezzard Charles Drive and roadway widening north of Findlay Street. Some additional overpass bridge/ramp construction would begin. The new Ohio River Bridge construction would continue. In Kentucky, there would be a short additional phase during the second phase to complete a small segment of roadway prior to beginning the third phase of construction.

The third phase of construction in Kentucky would involve completing the center roadway segment south of KY 1120/12th Street and finishing I-75 southbound mainline between KY 1120/12th Street and the Ohio River. In Ohio, the third phase of construction would be along the center roadway segment from the Ohio River north to the Western Hills Viaduct. Construction on the Western Hills Viaduct Interchange would begin during this phase. During this phase, I-75 southbound traffic would be shifted onto the lower deck of the new Ohio River Bridge.

The fourth and final phase involves shifting northbound I-75 onto the new Ohio River Bridge. In Kentucky, this will allow for the construction of northbound I-71/I-75 and collector-distributor roadway north of KY 1120/12th Street including the new connections to the existing Brent Spence Bridge. In Ohio, the fourth phase involves the construction of the majority of the downtown Cincinnati I-71/I-75 interchange including the new connections to Fort Washington Way and OH 2nd Street. The Western Hills Viaduct Interchange would be completed during this phase. The rehabilitation of the existing Brent Spence Bridge would also occur during this phase.

4.2 Measures to Minimize Harm to Resources During Construction

Any major construction project may inconvenience and disturb adjacent residents and businesses. In the case where an existing road is widened or otherwise improved, inconvenience to motorists also can occur. Without proper planning and implementation of controls, traffic disruption, loss of access, dust, noise, burning debris, and utility relocation could adversely affect the comfort and daily life of residents and visitors.

During construction of the recommended preferred alternative, access to all neighborhoods and community facilities would be maintained to the extent practical through controlled construction scheduling and/or provisions of alternate routes of entry. Any access changes would be mitigated by providing adequate signage for the access changes and, where necessary, by working with the facility throughout the construction period to provide advanced notification to the community regarding the changes.

Utilities may be impacted temporarily by the construction but it is anticipated that there will be no service interruptions. Utility impacts will be similar to that of any large construction project where temporary support of large or shallow utilities may be required. To mitigate temporary utility impacts, the Kentucky Transportation Cabinet (KYTC) and Ohio Department of Transportation (ODOT) will coordinate closely with the various utility owners in the study area throughout the design and construction phases of the project. Early coordination will decrease the chance of surprises during construction and will enable efficient phasing of the roadway, bridges, and utility work.

In order to minimize the amount of construction dust generated, the mitigation measures presented below could be followed.

Site Preparation:

- Minimize land disturbance.
- Use watering trucks to minimize dust.
- Cover trucks when hauling dirt.
- Stabilize the surface of dirt piles if they are not removed immediately.
- Use windbreaks to prevent accidental dust pollution.
- Limit vehicular paths and stabilize these temporary roads.
- Pave all unpaved construction roads and parking areas to road grade for a length no less than 50 feet from where such roads and parking areas exit the construction site. This prevents dirt from washing onto paved roadways.

Construction:

- Cover trucks when transferring materials.
- Use dust suppressants on unpaved traveled paths.
- Minimize unnecessary vehicular and machinery activities.
- Minimize dirt track-out by washing or cleaning trucks before leaving the construction site. An alternative to this strategy is to pave a few hundred feet of the exit road just before entering the public road.

Post-Construction:

- Re-vegetate any disturbed land not used.
- Remove unused material.

- Remove dirt piles.
- Re-vegetate all vehicular paths created during construction to avoid future off-road vehicular activities.

To abate or minimize expected construction noise impacts, mitigation measures could be noted directly in contract plans and specifications. Project specific construction noise abatement that could be utilized to minimize, to the greatest extent possible, the noise impact zone in areas outside the construction site boundary, include the following:

- Incorporate the needed abatement measures in the project plans and specifications.
- Limit the number and duration of idling equipment on site.
- Provide mufflers or silencers to construction equipment operated by internal combustion engines and maintain all construction equipment in good repair.
- Where possible reduce noise from all stationary site equipment and facilities by utilizing suitable enclosure.
- When possible minimize the use of back-up alarms during the nighttime hours.
- When possible scheduling of truck loading, unloading, and handling operations in order to minimize on site construction noise.

5.0 AREA OF POTENTIAL EFFECTS

The project Area of Potential Effects (APE) is located along a 7.8-mile segment of I-75 within the Commonwealth of Kentucky (state line mile 186.7) and the State of Ohio (state line mile 2.7). The project APE is shown on Exhibits 1 and 2. The northern limit of the project is 1500 feet north of the midpoint of the Western Hills Viaduct Interchange on I-75 in Cincinnati, Ohio. The southern limit of the project is 5000 feet south of the midpoint of the Dixie Highway Interchange on I-71/I-75 in Fort Wright, Kentucky. The eastern and western limits of the project generally follow the existing alignment of I-75. When a National Register of Historic Places (NRHP) listed district was located within the project APE, the project APE was expanded to encompass the entire NRHP boundary.

Due to the dramatic variations in the topography of the project area, the project team, in consultation with the Kentucky Heritage Council (KHC) and consulting parties, developed two APEs within the Kentucky Project Area. The defined project APE incorporates areas with the potential to experience direct effects as a result of the project and is largely defined by the proposed construction limits. At the request of the KHC, a viewshed APE or study area, which accounts for potential visual impacts associated with construction of a new bridge, also was defined (36 CFR Part 800.4[a][1]). The Advisory Council on Historic Preservation (ACHP) acknowledges the validity of establishing different APEs for the differing effects of a project.

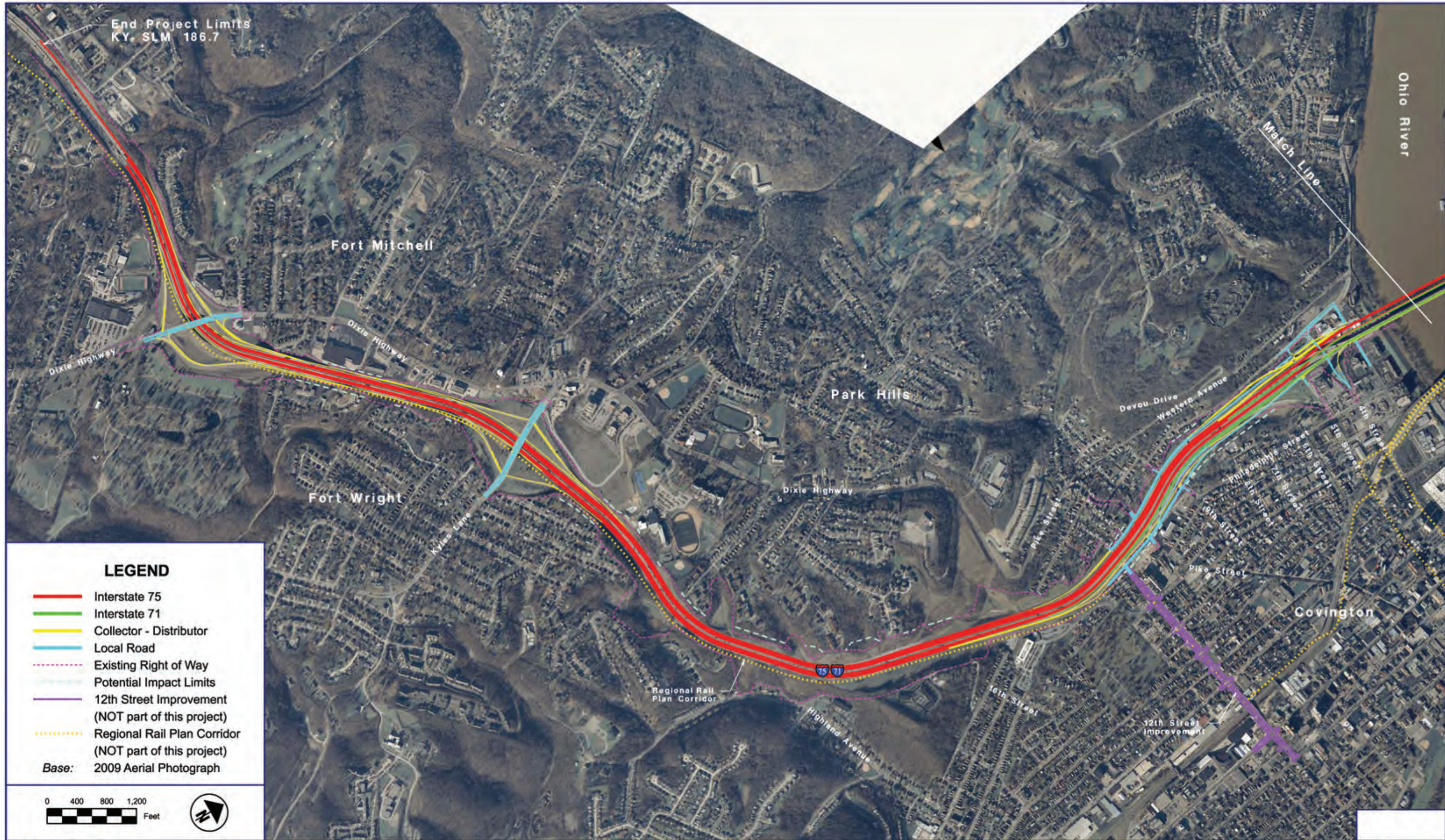
In order to identify the viewshed, a computer generated viewshed analysis was created that identified areas currently having a view of the Brent Spence Bridge. This analysis, based upon the height of the tallest points of the bridge, relies solely upon available topographic data and does not consider the height and location of buildings and vegetation that may restrict views. This analysis indicated that a considerable area located outside both the defined APE and the viewshed study area has a view of the existing bridge (or at least of its tallest points). However, because the computer analysis did not account for the presence of vegetation and other buildings that may limit actual views of the bridge, field investigations were conducted to verify the results of the computer analysis.

Field verification of the viewshed analysis data was conducted in order to more accurately define the viewshed of the existing bridge. Digital photographs and Global Positioning System (GPS) coordinates were taken from several evaluation points both inside and outside the defined APE. All previously recorded resources located within the viewshed APE were investigated to determine whether they have views of the bridge.

KHC's initial request for delineation of a viewshed APE stemmed from their concern about the possible visual effects of the proposed new bridge upon historic properties in downtown Covington, particularly the John Roebling Suspension Bridge, and upon the hillsides of West Covington. The project team determined, after delineation of the viewshed APE, that the potential visual effects associated with construction of a new bridge are not significant enough to warrant intensive survey to identify all NRHP-eligible properties that may be located within the viewshed APE. It is important to note that bridges have been a part of the landscape in this area since construction of the John Roebling Suspension Bridge in 1867. The subsequent construction of the C&O Railroad Bridges in the 1880s, and the Brent Spence Bridge in the early 1960s serves to reinforce the fact that for more than 100 years bridges have constituted a major landscape feature



Location of Project APE in Ohio



Location of Project APE in Kentucky

in the area. Construction of a new bridge does not represent the introduction of an intrusive new element into the landscape, as it might if a new bridge were proposed in a locale that had never had a bridge. Consequently, efforts to locate historic properties within the viewshed APE have been limited to the identification of properties previously listed in the NRHP. In a letter dated May 2, 2007, KHC concurred with Kentucky Transportation Cabinet-Division of Environmental Analysis (KYTC-DEA) and the Federal Highway Administration (FHWA) that areas east of the proposed project corridor will have a limited or obstructed view of the proposed undertaking, and concurred that until the project alternatives are determined and a more definitive APE is drawn, that the APE appears suitable.

However, Bridge Design Alternative 6 consists of a single tower that would be composed of two 500-foot tall needles supporting an approximately 155-foot wide double-decked truss superstructure. If built, the tower of the bridge will be one of the tallest structures on the riverfront, and will be visible from eastern vantages on both sides of the river, despite the three adjacent truss bridges to the east between downtown and the new bridge location. As such, this bridge alternative will serve as a landmark, updating the city skyline, confident that its simple geometry produces a monumental structure. If this bridge alternative is chosen as the preferred alternative, the viewshed analysis of the APE will be revisited in order to consider potential effects on the surrounding NRHP-listed and eligible resources. The viewshed analysis of the Bridge Design Alternative 6 will be deferred until the final selection is made, and then only of this alternative is selected.

6.0 CRITERION OF EFFECT

6.1 Assessing Effects to Historic Properties

In order to assess the effects of the proposed project upon historic properties, cultural resources professionals used the project's recommended preferred alternative to assess effects associated with this option upon the resources listed in or determined eligible for inclusion in the National Register of Historic Places (NRHP). The assessment of effects utilized the criteria of adverse effect defined in 36CFR800.5(a)(1). This section of the regulation states that:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the NRHP. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

Examples of adverse effects include, but are not limited to:

- physical destruction of, or damage to, all or part of the property;
- alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines;
- removal of the property from its historical location;
- change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historical features;
- neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

The assessment of effects will result in one of three findings:

- **No Historic Properties Affected:** This finding indicates that either there are no historic properties present or there are historic properties present but the undertaking will have no effect upon the characteristics that make the property NRHP-eligible.

- **No Adverse Effect:** This finding indicates that the undertaking's effects do not meet the criteria of adverse effect, or the undertaking is modified to avoid adverse effects.

- **Adverse Effect:** An adverse effect is determined if the undertaking is found to alter, directly or indirectly, the characteristics of a historic property that qualify it for NRHP eligibility by diminishing aspects of the property's integrity.

7.0 PHASED APPLICATION OF CRITERION OF EFFECT

All buildings within the project Area of Potential Effects (APE) were evaluated for their architectural integrity under Criterion C and their significance under Criteria A and B. Dates of construction for these resources were established through review of property records maintained by Hamilton County, Ohio and Kenton County, Kentucky, field observation, and cartographic research. Documentation for each property included photographs of the primary and secondary façades, property history and ownership information, building style or type, and integrity considerations. Properties less than 50 years old were not documented as part of this project.

7.1 Criteria of National Register Eligibility

Every building within the project APE was examined for its potential to meet the criteria for National Register eligibility. Four criteria are outlined for evaluating properties for eligibility and inclusion in the National Register. These criteria are:

- Criterion A: Association with events that have made a significant contribution to the broad patterns of our history;
- Criterion B: Association with the lives of persons significant in our past;
- Criterion C: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; and
- Criterion D: Yielded, or may be likely to yield, information important in prehistory or history. The application of Criterion D presupposes that the information imparted by the site is significant in history or prehistory and that at least one of the other National Register criterion is satisfied (U.S. Department of the Interior, National Park Service [USDOI-NPS 1995:2]).

7.1.1 Criteria Considerations

Certain properties, such as museum artifacts, cemeteries, birthplaces or graves of historical figures, religious properties, moved structures, reconstructions, or commemorative monuments, and properties less than 50 years old, are generally not eligible. However, they may qualify if they are part of historic districts or meet one of the following criteria exceptions. The project APE contained no resources eligible for listing in the National Register of Historic Places (NRHP) under the following criteria considerations:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

- C. A birthplace or grave of a historical figure of outstanding importance if there is no other appropriate site or building directly associated with his productive life; or
- D. A cemetery that derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- G. A property achieving significance within the past 50 years if it is of exceptional importance (USDOI-NPS 1995:2).

7.2 Assessing Integrity of Historic Properties

Retention of relevant aspects of integrity is critical to a property's significance under the NRHP Criteria for Evaluation. The National Register Bulletin *How to Apply the National Register Criteria for Evaluation* (NPS 1997) identifies the aspects of integrity and describes their relevance to the NRHP Criteria for Evaluation. The seven aspects of integrity are location, design, setting, materials, workmanship, feeling, and association. Each is described in the bulletin as follows:

Location is the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons.

Design is the combination of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property (or its significant alteration) and applies to activities as diverse as community planning, engineering, architecture, and landscape architecture. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials.

A property's design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount, and style of ornamental detailing; and arrangement and type of plantings in a designed landscape.

Design can also apply to districts, whether they are important primarily for historic association, architectural value, information potential, or a combination thereof. For districts significant primarily for historic

association or architectural value, design concerns more than just the individual buildings or structures located within the boundaries. It also applies to the way in which buildings, sites, or structures are related.

Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the *character* of the place in which the property played its historical role. It involves *how*, not just where, the property is situated and its relationship to surrounding features and open space.

Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences.

The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as: topographic features (a gorge or the crest of a hill); vegetation; simple manmade features (paths or fences); and relationships between buildings and other features or open space. These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its *surroundings*. This is particularly important for districts.

Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of particular types of materials and technologies. Indigenous materials are often the focus of regional building traditions and thereby help define an area's sense of time and place.

A property must retain the key exterior materials dating from the period of its historic significance. If the property has been rehabilitated, the historic materials and significant features must have been preserved. The property must also be an actual historic resource, not a reconstruction of a historic resource; a recent structure fabricated to look historic is not eligible. Likewise, a property whose historic features and materials have been lost and then reconstructed is usually not eligible.

Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques.

Workmanship is important because it can furnish evidence of the technology of a craft, illustrate the aesthetic principles of a historic or

prehistoric period, and reveal individual, local, regional, or national applications of both technological practices and aesthetic principles.

Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character.

Association is the direct link between an important historic event or person and a historic property. A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character.

All properties change over time. According to *How to Apply the National Register Criteria for Evaluation*, it is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. These are the features that define both *why* a property is significant and *when* it was significant.

A property that is significant for its historic association (Criteria A or B) is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).

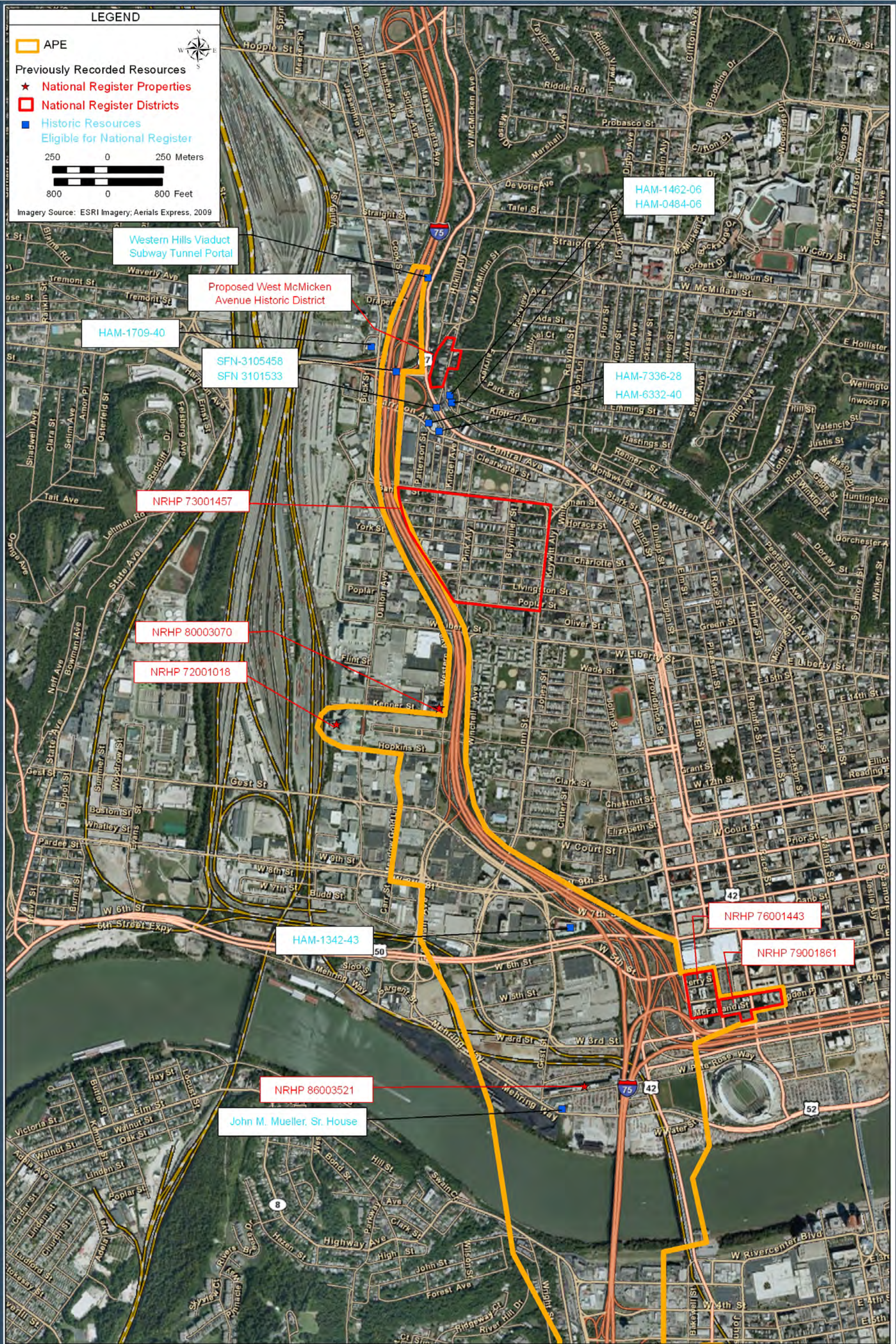
A property important for illustrating a particular architectural style or construction technique (Criterion C) must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible *if* it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.

For a historic district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. In addition, the relationships among the district's components must be substantially unchanged since the period of significance. A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment.

8.0 SUMMARY OF EFFECTS

Thirty-seven historic properties were identified within the project Area of Potential Effect (APE). Of these, 12 were already listed in the National Register of Historic Places (NRHP) and 25 were determined to be eligible for inclusion in the NRHP. Table 1 provides a list of the 37 historic properties. Exhibits 3 and 4 show the locations of the historic properties.

Historic resources listed in the NRHP that are located outside the APE were not surveyed as part of this project. Some NRHP-listed resources near the project APE, such as the Linden Grove Cemetery (NRHP 00001600) in Covington, Kentucky, are noted on Exhibits 3 and 4.



LEGEND

- APE
- Previously Recorded Resources
 - ★ National Register Properties
 - National Register Districts
 - Historic Resources Eligible for National Register

250 0 250 Meters
800 0 800 Feet

Imagery Source: ESRI Imagery; Aerials Express, 2009



Project APE Map Showing National Register of Historic Places Listed and Eligible Properties in Ohio

EXHIBIT

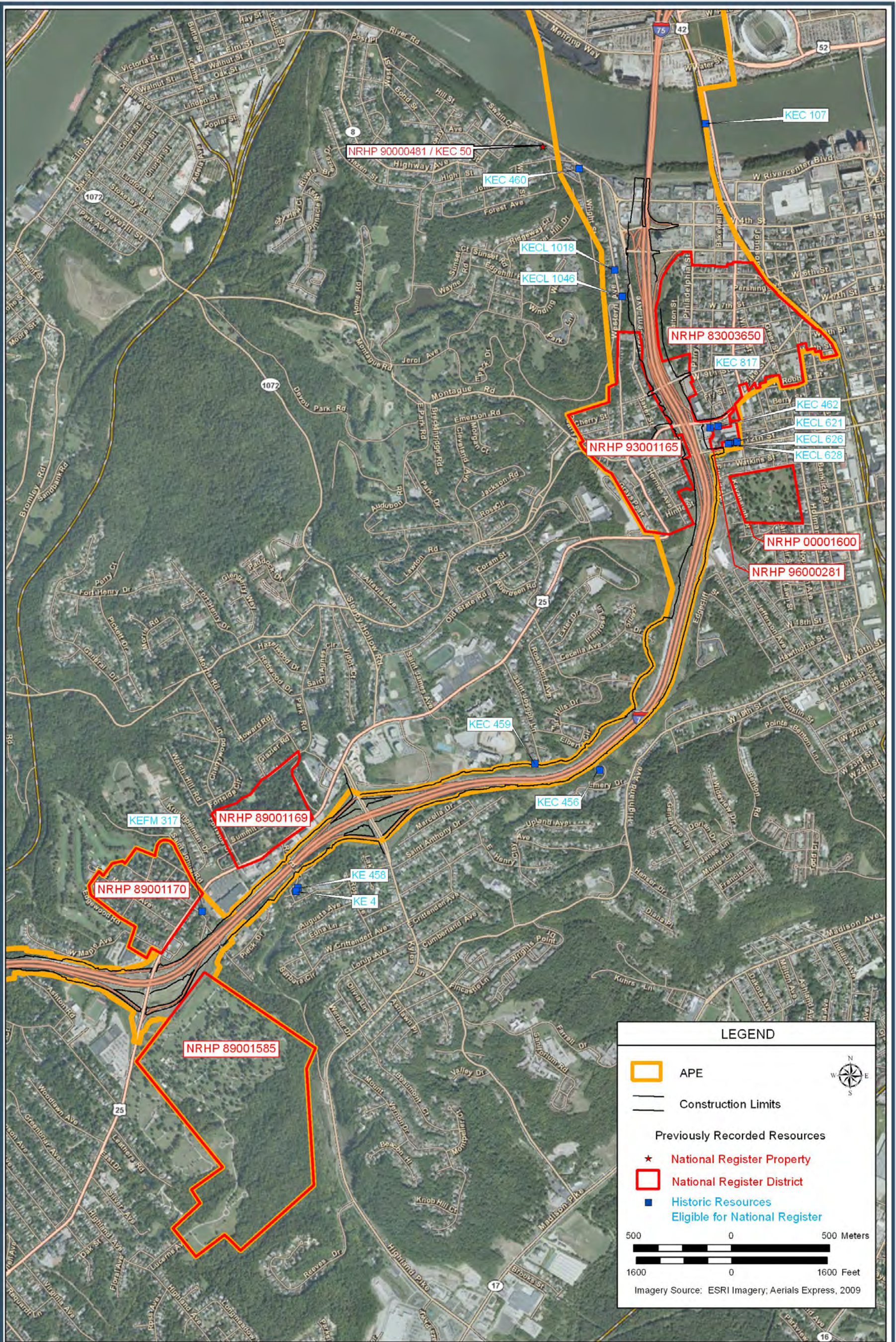


Table 1. Historic Properties Identified within the Project APE

Resource Number	Resource Name	Location	Effect
N/A	Western Hills Viaduct Subway Tunnel Portals	Central Parkway near Addison Street	No Effect
Cincinnati Historic Inventory District Form	Proposed West McMicken Avenue Historic District	2321–2411, 2342–2464 West McMicken Avenue	No Effect
HAM-1709-40	Chem-Pak, Inc. Building	2261 Spring Grove Avenue	No Effect
SFN 3105458	Western Hills Viaduct	Spans I-75 and Mill Creek Valley between Central Parkway and Harrison Avenue	No Adverse Effect
SFN 3101533	Brighton Bridge	Colerain Avenue spanning Central Parkway	No Effect
HAM-7633-28	High-Craft Printing Company	1120 Harrison Avenue	No Effect
HAM-2164-28	Central Trust - Brighton Office	1110 Harrison Avenue	No Effect
HAM-1462-06	Rummane Building	635 Kress Alley	No Effect
HAM-0484-06		650 West McMicken Avenue	No Effect
NRHP 73001457	Dayton Street Historic District	Various	No Effect
NRHP 80003070	Our Lady of Mercy	1409 Western Avenue	No Effect
NRHP 72001018	Union Terminal	1301 Western Avenue	No Effect
HAM-1342-43	Harriet Beecher Stowe Elementary School	635 West Seventh Street	No Effect
NRHP 76001443 and NRHP 79001861	West Fourth Street Historic District and Amendment	Various	No Effect
NRHP 86003521	B&O Railroad Freight Terminal/Longworth Hall	700 Pete Rose Way/Second Street	Adverse Effect
N/A	John M. Mueller, Sr. House	724 Mehring Way	No Effect
KEC 107	C&O Railroad Bridge	Spans Ohio River between the Brent Spence and Clay Wade Bailey bridges	No Effect
NRHP 90000481/ KEC 50	Kenney's Crossing	1001 Highway Avenue	No Effect
KEC 460		881 Highway Avenue	No Effect
NRHP 83003650	West Side/Main Strasse Historic District	Various	No Effect
KECL 1018		521 Western Avenue	No Effect
KECL 1046		632 Western Avenue	No Effect

Table 1. Historic Properties Identified within the Project APE

Resource Number	Resource Name	Location	Effect
NRHP 93001165	Lewisburg Historic District	Various	Adverse Effect
KECL 817	Boehmer Decorating Center	533–535 Pike Street	No Effect
KEC 462	Glier's Goetta	533 Goetta Place	No Effect
NRHP 96000281	Bavarian Brewing Company	522 West KY 1120/12 th Street	No Effect
KECL 621		504 West KY 1120/12 th Street	No Effect
KECL 626		514 West KY 1120/12 th Street	No Effect
KECL 628		516 West KY 1120/12 th Street	No Effect
KEC 456		1000 Emery Drive	No Effect
KEC 459		509 St. Joseph Lane	No Effect
KEC 458		45 Rivard Drive	No Effect
KE 4	Kennedy-Rivard Homestead	50 Rivard Drive	No Effect
NRHP 89001169	Fort Mitchell Heights Historic District	Various	No Effect
NRHP 89001170	Old Fort Mitchell Heights Historic District	Various	No Effect
KEFM 317		2 East Orchard Drive	No Effect
NRHP 89001585	Highland Cemetery Historic District	2167 Dixie Highway	No Effect

9.0 ASSESSMENT OF EFFECTS ON HISTORIC PROPERTIES

9.1 Ohio Resources

Sixteen historic properties were identified within the Ohio side of the project Area of Potential Effects (APE). These resources and any associated effects are described in more detail in the following sections.

9.1.1 Western Hills Viaduct Subway Tunnel Portals

The Western Hills Viaduct subway tunnel portals' proposed boundaries fall within the northern edge of the APE. The boundaries include the two portals, the paved access road to the north, the gravel access path to the south, and the associated portion of the retaining wall, with railing, along Central Parkway. Both portals were previously determined eligible for listing in the National Register of Historic Places (NRHP) in 2007. ODOT and OHPO concurred with this determination and the proposed boundaries in April 2007.

On February 25, 2011, the Ohio State Historic Preservation Office (OHPO) concurred, "Additional investigations and consultation will be conducted; if it is determined the preferred alternative has the potential to effect the Western Hills Viaduct Subway Portals, eligible for listing on the NRHP, or any of the contributing features of the portal, including the tunnel itself" (Campbell 2/25/2011). Alternative I, the preferred alternative, will not impact the historic property. The character defining features of the property will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of "no historic properties affected" is proposed.

9.1.2 Cincinnati Historic Inventory District Form - Proposed West McMicken Avenue Historic District

The resource consists of 21 buildings located along West McMicken Avenue between West McMillan Street and the Brighton Bridge Approach in Cincinnati, Ohio. The district is considered eligible for inclusion in the NRHP under Criterion C for its excellent examples of several architectural styles and types, including Greek Revival, Second Empire, Victorian, Italianate, and American Foursquare.

Based on data in the *Brent Spence Bridge Replacement/Rehabilitation Project Noise Study* (December 2010), noise levels at a representative site in close proximity to the West McMicken Avenue Historic District indicate that current ambient noise levels exceed the Federal Highway Administration (FHWA) noise abatement criteria (NAC) of 67 dBA for Category B land uses. Current ambient noise level is approximately 72 dBA. Future (2035) noise levels would be slightly lower with the No Build Alternative, 68 dBA in the AM Peak and 70 dBA in the PM Peak. Future (2035) noise levels for Alternative I would be 68 dBA during the AM and 69 dBA during the PM Peak Hour periods.

On February 25, 2011, the OHPO concurred the proposed historic district, West McMicken Avenue Historic District, is eligible for inclusion on the NRHP and the following historic boundaries are appropriate:

Boundaries begin at the western curb line of West McMicken Avenue south of the Warner Street steps and proceed east to the rear of the parcel boundary of 2364 West

McMicken Avenue. The boundary proceeds south following the rear line of the parcels fronting West McMicken Avenue to a point at the southeast corner of the parcel boundary of 2342 West McMicken Avenue. The boundary then continues west to the western curb line of West McMicken Avenue and turns south along the road to a point on the southern parcel boundary of 2321 West McMicken Avenue. Turning west, the boundary proceeds to the eastern curb line of Central Parkway, where it turns north, follow West McMillan Street to the northern parcel boundary of 2411 West McMicken Avenue. The boundary then turns east along said parcel to the western curb line of West McMicken Avenue, thence continuing south to the point of beginning. The proposed district includes one non-contributing building located at 2351 West McMicken Avenue and one non-contributing structure, a billboard, at 2329 West McMicken Avenue (Campbell 2/25/2011).

No impacts to the historic district are anticipated in association with Alternative I, the preferred alternative. The character defining features of the district will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.1.3 HAM-1709-40 - Chem-Pak, Inc. Building

The resource is located at 2261 Spring Grove Avenue in Cincinnati, Ohio. The building is considered eligible for inclusion in the NRHP under Criterion C as a well-preserved example of Victorian architecture adapted to an industrial building. The building retains all aspects of its historic integrity.

The impact limits for Alternative I are located east of the property, and therefore, will not cause any direct effect upon the resource. Additionally, any indirect effects of this project will not alter any of the characteristics of the property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the resource’s location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the resource.

On August 3, 2007, the OHPO concurred “The Chem-Pack Building, 2261 Spring Grove Avenue, HAM-1709-40, is eligible under Criterion C, and the recommended boundary is appropriate.” The historic boundary recommended by FHWA/ODOT on June 28, 2007, referenced by the OHPO, encompasses “the modern parcel boundary”. No impacts to the historic property are anticipated in association with Alternative I, the preferred alternative. The character defining features of the property will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.1.4 SFN 3105458 - Western Hills Viaduct

The resource spans the Mill Creek Valley between Central Parkway on the east and Harrison and Queen City avenues on the west in Cincinnati, Ohio. The structure is considered eligible for inclusion in the NRHP under Criterion A for its association with the Union Terminal project and its role in Cincinnati’s transportation planning history.

The Western Hills Viaduct would be affected under Alternative I through reconstruction of the interchange connecting I-75 to the viaduct. The tight diamond interchange in Alternative I would require reconstruction of 1,108 feet of the approach ramps of the

Western Hills Viaduct to connect with the interstate reconstruction at ground level. This will not result in any physical destruction or damage to the property, but does constitute an alteration to the property as it currently exists. The alteration will not have an adverse effect on the property because it reworks the connection to the bridge, which originally was built in 1960 with the construction of I-75. The new design differs greatly from the original 1930s concrete viaduct and will therefore not convey a false historic appearance. Consequently, the alteration will result in no adverse effect on the historic property.

On February 25, 2011, the OHPO concurred the Western Hills Viaduct, eligible for inclusion on the NRHP, historic boundaries encompass “the footprint of the bridge, including its piers, super and sub-structures, and roadway from Central Parkway on the east to just east of Beekman Street on the west” (Campbell 2/25/2011). Therefore, the proposed reconstruction of approximately 1,108 feet of the eastern approach ramps and the reworking of the connection to the 1960 section of the bridge, within the NRHP boundaries, will not adversely effect the characteristics that qualify the historic property for inclusion on the NRHP. In accordance with 36 CFR § 800, a finding of “no adverse effect” is proposed.

9.1.5 SFN 3101533 - Brighton Bridge

The Brighton Bridge connects West McMicken Avenue to Colerain and Harrison avenues at Brighton Corner, passing over Central Parkway in Cincinnati, Ohio. The Brighton Street Bridge was previously determined eligible in April 2010 as a result of the *2009 Ohio DOT Bridge Inventory Summary and Tables Survey Forms of Eligible/National Register Listed Bridges*. This eligibility determination was accepted by the FHWA, ODOT, and the OHPO.

On February 25, 2011, the OHPO concurred the appropriate historic boundaries encompass “the footprint of the bridge from the retaining wall on the east side of Central Parkway to the bridge approach beginning near the intersection of Colerain Avenue and Harrison Avenue on the southwest” (Campbell 2/25/2011). No impacts to the historic property are anticipated in association with Alternative I, the preferred alternative. The character defining features of the property will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.1.6 HAM-1462-06 - Rumman Building

The resource is located at 635 Kress Alley in Cincinnati, Ohio. The building is considered eligible for inclusion in the NRHP under Criterion C as a well-detailed example of the Italianate Style applied to a center-passage dwelling, which is an uncommon building type in Cincinnati.

On February 25, 2011, the OHPO concurred the “appropriate historic boundaries would include the legal parcel boundary of the property” (Campbell 2/25/2011). No impacts to the historic property are anticipated in association with Alternative I, the preferred alternative. The character defining features of the property will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.1.7 HAM-0484-06 - 650 West McMicken Avenue

The resource is located at 650 West McMicken Avenue in Cincinnati, Ohio. The building is considered eligible for inclusion in the NRHP under Criterion C as an ornate, stylish, and well-preserved example of the Italianate Style applied to a party-wall duplex. While the Italianate Style is well represented in Cincinnati, this building is distinguished for its wealth of robust ornamentation, high degree of integrity, and is a relatively uncommon building type within the city.

On February 25, 2011, the OHPO concurred “the appropriate historic boundaries would include the legal parcel boundary” (Campbell 2/25/2011). No impacts to the historic property are anticipated in association with Alternative I, the preferred alternative. The character defining features of the property will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.1.8 HAM-7633-28 - High-Craft Printing Company

The resource is located at 1120 Harrison Avenue in Cincinnati, Ohio. The building is considered eligible for inclusion in the NRHP under Criterion C as an example of the Neo-Classical Revival style of architecture applied to a government building dating to the 1920s.

On February 25, 2011, the OHPO concurred the High-Craft Printing Building (HAM-7366-28), historically known as the “Post Office Station B”, is eligible for listing in the NRHP (Campbell 2/25/2011). The appropriate NRHP boundaries include the footprint of the building itself.” No impacts to the historic property are anticipated in association with Alternative I, the preferred alternative. The character defining features of the property will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.1.9 HAM-2164-28 - Central Trust - Brighton Office

The resource is located at 1110 Harrison Avenue in Cincinnati, Ohio. The building is considered eligible for inclusion in the NRHP under Criterion C as an excellent example of high-style Renaissance Revival style architecture.

On February 25, 2011, the OHPO concurred the appropriate NRHP boundaries include the legal parcel boundary of the property” (Campbell 2/25/2011). No impacts to the historic property are anticipated in association with Alternative I, the preferred alternative. The character defining features of the property will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.1.10 NRHP 73001457 - Dayton Street Historic District

The resource is roughly bounded by Bank, Linn, and Poplar streets, and Winchell Avenue in Cincinnati, Ohio. In 1973, the district was listed in the NRHP under Criteria A and C for its association with urban planning and architecture in Cincinnati. Reevaluation of the district showed the Dayton Street Historic District retains historic integrity that qualified the building for inclusion in the NRHP.

On August 3, 2007, the OHPO concurred portions of the Dayton Street Historic District are located within the APE of the subject undertaking. No impacts to the historic district are anticipated in association with Alternative I, the preferred alternative. The character defining features of the historic district will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.1.11 NRHP 80003070 - Our Lady of Mercy

The resource is located at 1409 Western Avenue in Cincinnati, Ohio. The building was listed in the NRHP in 1980 under Criterion C for its architecture and association with local architect Samuel Hannaford. Reevaluation of the building showed the Our Lady of Mercy building retains historic integrity that qualified the building for inclusion in the NRHP.

On August 3, 2007, the OHPO concurred the Cincinnati Job Corps Center/Our Lady of Mercy High is eligible for inclusion on the NRHP. No impacts to the historic property are anticipated in association with Alternative I, the preferred alternative. The character defining features of the property will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.1.12 NRHP 72001018 - Union Terminal

The resource is located at the western terminus of Ezzard Charles Drive in Cincinnati, Ohio. The building was listed in the NRHP in 1972 under Criteria A and C for its association with rail transportation and architecture in Cincinnati. This property is also a National Historic Landmark as determined by the U.S. Congress on May 5, 1977. The NRHP boundary of the property encompasses the building, the fountain in front of the building, and the plaza leading to the building. Reevaluation of the building showed Union Terminal retains historic integrity that qualified the building for inclusion in the NRHP.

No impacts to the historic property are anticipated in association with Alternative I, the preferred alternative. The character defining features of the property will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.1.13 HAM-1342-43 - Harriet Beecher Stowe Elementary School

The resource is located at 635 West Seventh Street in Cincinnati, Ohio. The building is considered eligible for inclusion in the NRHP under Criterion B for its association with Dr. Jennie D. Porter, the first African-American woman to earn a Ph.D. at the University of Cincinnati. Alternative I would not directly impact the former Harriet Beecher Stowe Elementary School or land within the historic boundary of the property. The parking garage located on the property is outside of the proposed NRHP boundary.

On February 2, 2009, the OHPO concurred, “The Harriet Beecher Stowe Elementary School, 635 West 7th Street (HAM-134243) is eligible for the NRHP under Criterion B of its association with Dr. Jennie D. Porter (Campbell 2/9/2009). The boundaries for the historic property consist of the footprint of the existing building”. No impacts to the historic property are anticipated in association with Alternative I, the preferred alternative. The character defining features of the property will not be altered or

diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.1.14 NRHP 76001443 and 79001861 - West Fourth Street Historic District

The resource is located along West Fourth Street in downtown Cincinnati, Ohio. The district was listed in the NRHP in 1976 and expanded in 1979 under Criteria A and C for its association with commerce and architecture in Cincinnati. Reevaluation of the district showed the West Fourth Street Historic District retains historic integrity that qualified the building for inclusion in the NRHP.

On August 3, 2007, the OHPO concurred “Portions of the West Fourth Street Historic District are in the APE for the project.” No impacts to the historic district are anticipated in association with Alternative I, the preferred alternative. The character defining features of the historic district will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.1.15 NRHP 86003521 - B&O Railroad Freight Terminal/Longworth Hall

The resource is located at 700 Pete Rose Way in Cincinnati, Ohio, and includes the scale building to the north of the terminal. The building was listed in the NRHP in 1986 under Criteria A and C for its association with rail transportation and architecture in Cincinnati. Reevaluation of the building showed the B&O Railroad Freight Station retains historic integrity that qualified the building for inclusion in the NRHP. A photograph of the building is located in Appendix A.

The NRHP boundary includes the B&O Railroad Freight Terminal/Longworth Hall building as well as the former Scale House or Boiler Room located behind the building at its west end. The proposed alteration of the historic property constitutes a finding of “adverse effect” in accordance with 36 CFR § 800.

The undertaking requires the physical destruction of the eastern portion of Longworth Hall. Thus, the undertaking will have an adverse effect upon the NRHP-listed historic property. Alternative I would pass through 198 feet of the eastern end of the building, requiring that three, 15-foot, two 13-foot, and six 12-foot bays of the building be demolished. Alternative I would eliminate a total of 20,000 square feet of floor space. This affected section of the building is that portion which was previously altered by reducing its length and adding a five-story 30,000 square foot brick addition.

9.1.16 John M. Mueller, Sr. House

The resource is located at 724 Mehring Way in Cincinnati, Ohio. The building is considered eligible for inclusion in the NRHP under Criterion C as it represents a rare surviving example of mid- to late-nineteenth century residential architecture in this area of Cincinnati and its exterior sandstone construction material sets the house apart from other nineteenth century residential buildings located near downtown Cincinnati.

On August 3, 2007, the OHPO concurred the John Mueller House; 724 Mehring Way is eligible for inclusion on the NRHP. No impacts to the historic property are anticipated in association with Alternative I, the preferred alternative. The character defining features

of the historic property will not be altered or diminished; therefore, in accordance with 36 CFR § 800, a finding of “no historic properties affected” is proposed.

9.2 Kentucky Resources

Twenty-one historic properties were identified within the Kentucky side of the project APE. These resources and any associated effects are described in more detail in the following sections.

9.2.1 KEC 107 - C&O Railroad Bridge

The resource spans the Ohio River between the cities of Cincinnati, Ohio, and Covington, Kentucky. The bridge is located between the Brent Spence and Clay Wade Bailey bridges, and shares two piers with the Clay Wade Bailey Bridge. The resource is considered eligible for inclusion in the NRHP under Criterion C as a significant work of engineering, being the world’s second longest continuous truss bridge.

The impact limits of Alternative I are located southwest of the C&O Railroad Bridge, and therefore, will not cause any direct effect upon the property. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the bridge.

9.2.2 NRHP 90000481/KEC 50 - Kenney’s Crossing

The resource is located at 1001 Highway Avenue in Covington, Kentucky. In 1990, the building was listed in the NRHP under Criteria A and C for its association with transportation development history between Covington and Ludlow, Kentucky, and as a representative example of West Covington, Kentucky’s, early architectural heritage. Reevaluation of the building showed Kenney’s Crossing retains historic integrity that qualified the property for inclusion in the NRHP.

The impact limits of Alternative I are located northeast of Kenney’s Crossing, and therefore, will not cause any direct effect upon the property. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.3 KEC 460 - 881 Highway Avenue

Resource KEC 460 is located at 881 Highway Avenue in Covington, Kentucky. The building is considered eligible for inclusion in the NRHP under Criterion C as a good example of Italianate Style architecture that retains historic integrity.

The impact limits for Alternative I are located near Resource KEC 460, but will not cause any direct effect upon the property. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property’s location, design,

setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.4 NRHP 83003650 - West Side/Main Strasse Historic District

The West Side/Main Strasse Historic District is located in Covington, Kentucky and is roughly bounded by the C&O Railroad, 6th Street, Philadelphia Street, Goebel Park, Dalton, Pike, and Robbins streets. In 1983, the district was listed in the NRHP under Criteria A and C for its associations with Covington's commercial, educational, industrial, religious, and social history and for its extensive collection of intact late-nineteenth century urban residential architecture. Reevaluation of the district showed the West Side/Main Strasse Historic District retains historic integrity that qualified the district for inclusion in the NRHP.

The impact limits for Alternative I are located southwest of the West Side/Main Strasse Historic District, and therefore, will not cause any direct effect upon the property. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic district that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the district.

9.2.5 KECL 1018 - 521 Western Avenue

Resource KECL 1018 is located at 521 Western Avenue in Covington, Kentucky. The building is considered eligible for inclusion in the NRHP under Criterion C as an example of an uncommon early house type in Covington that retains historic integrity.

The impact limits for Alternative I are located east of Resource KECL 1018, and therefore, will not cause any direct effect upon the property. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.6 KECL 1046 - 632 Western Avenue

Resource KECL 1046 is located at 632 Western Avenue in Covington, Kentucky. The building is considered eligible for inclusion in the NRHP under Criterion C as an uncommon example of the Craftsman Style, Bungalow house type in the Covington area that retains most of its historic integrity.

The impact limits for Alternative I are located east of Resource KECL 1046, and therefore, will not cause any direct effect upon the property. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.7 NRHP 93001165 - Lewisburg Historic District

The Lewisburg Historic District is located in Covington, Kentucky, includes approximately 70 acres, and is roughly bounded by the I-71/I-75 corridor and the Covington city limits.

In 1993, the district was listed in the NRHP under Criteria A and C for its significance to suburban growth in Covington from 1840 to 1947 and for its cohesive community of domestic, institutional, and commercial architecture. At the date of listing, the historic district included 430 contributing buildings and 46 non-contributing buildings. The majority of contributing buildings are residential houses built in the Italianate, Gothic Revival, Queen Anne, Colonial Revival, Dutch Colonial Revival, and Bungalow/Craftsman styles. Other contributing buildings include the neighborhood's supporting institutional and commercial buildings. Reevaluation of the district showed the Lewisburg Historic District retains historic integrity that qualified the district for inclusion in the NRHP. Photographs of the contributing resources to the historic district that will be impacted by construction of the project are located in Appendix A.

Alternative I will intersect the eastern boundary of the Lewisburg Historic District (shown on Exhibit 6). Using the criteria of adverse effect in 36 CFR 800.5(a)(1) and guidance found in the National Register Bulletin, *How to Apply the National Register Criteria for Evaluation*, the Lewisburg Historic District was evaluated to determine how Alternative I will adversely affect the historic district.

Alternative I will result in physical destruction of or damage to all or part of the historic property. Alternative I would require the acquisition of 2.1 acres of land within the historic district boundary, affecting 28 of the 430 properties that are considered to be contributing elements to the Lewisburg Historic District. Map ID number KY-066 (620 Lewis Street) is listed as a contributing resource in the Lewisburg Historic District NRHP nomination; however, this building is no longer extant, and therefore, is no longer a contributing resource to the district. Map ID numbers KY-065, KY-074, KY-075, KY-113, KY-114, and KY-121 are not listed in the Lewisburg Historic District NRHP nomination, but are listed here as non-contributing to the district because they are vacant lots. Twenty-one parcels would be acquired as total right-of-way acquisitions with demolition of structures. Seven additional parcels would be affected through a partial or strip-take right-of-way acquisition of land, which will not require the taking of any buildings on the parcel. The list of effected properties is shown in Table 2. Additionally, the historic district would experience a change in access with the closure of Lewis Street at Pike Street.

Table 2. Alternative I Impacts on the Lewisburg Historic District

Map ID	Contributing or Non-Contributing Property	Address	Parcel ID	Total Acres	Taken Acres	Taken Percent	Partial or Total Take of Parcel	Building Impact
KY-049	Contributing	610 12 th St W	040-44-09-026.00	0.06	0.0031	5.17%	Partial - strip take along front yard	No
KY-050	Contributing	608 12 th St W	040-44-09-025.00	0.06	0.06	100.00%	Total	Yes
KY-051	Contributing	606 12 th St W	040-44-09-024.00	0.05	0.05	100.00%	Total	Yes

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Table 2. Alternative I Impacts on the Lewisburg Historic District

Map ID	Contributing or Non-Contributing Property	Address	Parcel ID	Total Acres	Taken Acres	Taken Percent	Partial or Total Take of Parcel	Building Impact
KY-052	Contributing	604 12 th St W	040-44-09-023.00	0.06	0.06	100.00%	Total	Yes
KY-053	Contributing	605 11 th St W	040-44-09-020.00	0.06	0.06	100.00%	Total	Yes
KY-054	Contributing	609 11 th St W	040-44-09-019.00	0.12	0.0017	1.42%	Partial - strip take along front yard	No
KY-055	Contributing	606 11 th St W	040-44-08-017.01	0.05	0.05	100.00%	Total	Yes
KY-056	Contributing	608 11 th St W	040-44-08-017.02	0.05	0.05	100.00%	Total	Yes
KY-057	Contributing	610-12 11 th St W	040-44-08-018.00	0.11	0.01	9.55%	Partial - strip take along back yard	No
KY-065	Non-Contributing	610-18 Pike St	040-44-06-027.00	0.31	0.31	100.00%	Total	No
KY-066	Non-Contributing	620 Lewis St	040-44-06-025.00	0.12	0.03	21.08%	Partial - strip take along front yard	No
KY-067	Contributing	622 Lewis St	040-44-06-024.00	0.11	0.11	100.00%	Total	Yes
KY-068	Contributing	624 Lewis St	040-44-06-023.00	0.10	0.10	100.00%	Total	Yes
KY-069	Contributing	626 Lewis St	040-44-06-022.00	0.10	0.10	100.00%	Total	Yes
KY-070	Contributing	628 Lewis St	040-44-06-021.00	0.09	0.09	100.00%	Total	Yes
KY-071	Contributing	630 Lewis St	040-44-06-020.00	0.08	0.08	100.00%	Total	Yes
KY-072	Non-Contributing	632-634 Lewis St	040-44-06-019.00	0.17	0.02	10.18%	Partial - strip take along front yard	No

Table 2. Alternative I Impacts on the Lewisburg Historic District

Map ID	Contributing or Non-Contributing Property	Address	Parcel ID	Total Acres	Taken Acres	Taken Percent	Partial or Total Take of Parcel	Building Impact
KY-073	Contributing	636-40 Lewis St	040-44-03-018.00	0.26	0.0002	0.08%	Partial - strip take along front yard	No
KY-074	Non-Contributing	639-41 Lewis St	040-44-07-015.01	0.28	0.28	100.00%	Total	No
KY-075	Non-Contributing	652-54 Pike St	040-44-07-015.02	0.55	0.07	13.09%	Partial - strip take along front	No
KY-076	Contributing	643 (623 in NRHP nomination) Laurel St	040-44-06-013.00	0.34	0.01	2.38%	Partial - strip take along southeast corner	No
KY-078	Contributing	639 9 th St W	040-44-06-002.00	0.11	0.01	7.45%	Partial - strip take along front yard	No
KY-079	Contributing	641-645 9 th St W	040-44-06-003.00	0.17	0.0022	1.29%	Partial - strip take along south corner	No
KY-096	Contributing	872 Crescent Ave	040-44-04-033.00	0.06	0.06	100.00%	Total	Yes
KY-113	Non-Contributing	826 Crescent Ave	040-44-04-014.00	0.04	0.04	100.00%	Total	No
KY-114	Non-Contributing	826 Crescent Ave	040-44-04-013.00	0.09	0.01	13.78%	Partial - strip take along east corner	No
KY-115	Contributing	824 Crescent Ave	040-44-04-012.00	0.06	0.06	100.00%	Total	Yes
KY-116	Contributing	822 Crescent Ave	040-44-04-011.00	0.06	0.06	100.00%	Total	Yes
KY-117	Contributing	820 Crescent Ave	040-44-04-010.01	0.06	0.06	100.00%	Total	Yes
KY-118	Contributing	818 Crescent Ave	040-44-04-009.00	0.05	0.05	100.00%	Total	Yes

Table 2. Alternative I Impacts on the Lewisburg Historic District

Map ID	Contributing or Non-Contributing Property	Address	Parcel ID	Total Acres	Taken Acres	Taken Percent	Partial or Total Take of Parcel	Building Impact
KY-119	Contributing	816 Crescent Ave	040-44-04-008.00	0.06	0.06	100.00%	Total	Yes
KY-120	Contributing	812 Crescent Ave	040-44-04-007.00	0.11	0.11	100.00%	Total	Yes
KY-121	Non-Contributing	810 Crescent Ave	040-44-04-005.00	0.05	0.05	100.00%	Total	No
KY-122	Contributing	808 Crescent Ave	040-44-04-004.00	0.06	0.06	100.00%	Total	Yes
KY-123	Contributing	806 Crescent Ave	040-44-04-003.00	0.06	0.06	100.00%	Total	Yes
KY-124	Contributing	804 Crescent Ave	040-44-04-002.00	0.06	0.06	100.00%	Total	Yes

- Alternative I will not result in alteration of the historic property in a manner not consistent with the Secretary of Interior’s Standards for the Treatment of Historic Properties. Alternative I will not require the restoration, rehabilitation, repair, maintenance, stabilization, hazardous materials remediation, or provision of handicapped access to any contributing resources within the historic district.
- Alternative I will not remove the historic property from its historic location.
- Alternative I will not introduce atmospheric or audible elements that diminish the integrity of the historic property’s significant historic features. Based on data in the *Brent Spence Bridge Replacement/Rehabilitation Project Noise Study* (December 2010), existing ambient noise levels within the Lewisburg Historic District exceed the FHWA’s noise abatement criteria (NAC) (67 dBA) for Category B land uses. Future (2035) noise levels for Alternative I would range from 68 to 72 dBA, which exceed the FHWA NAC. Future noise levels for the No Build Alternative would be lower than for Alternative I, but would still approach or exceed the NAC at most of the representative sites analyzed for the district.

In accordance with FHWA noise policies, abatement should be considered for locations where traffic-related noise impacts will occur. For this project, noise barriers have been determined to be the only potentially effective noise abatement measure and the Kentucky Transportation Cabinet (KYTC) has defined criteria for determining the feasibility and reasonableness of noise barriers. The Lewisburg Historic District was considered for a noise barrier, which was found to be feasible and reasonable for Alternative I in 2010. The proposed barrier would be approximately 521 feet in length

and 12 feet in height with the potential to reduce noise levels by up to 11 dBA. The noise wall would be constructed between the residences and the collector-distributor roadway that provides access to KY 4th Street.

The revised noise study, per the 2011 federal regulations, which will outline any and all proposed noise barriers for the project, will be completed in November 2011. While the 2010 proposed noise wall will represent a visual effect at the eastern edge of the Lewisburg Historic District, it should be noted that the existing interstate presently serves as a visual obstruction in this area, obscuring views to and from the district. The Lewisburg Historic District will benefit from the addition of a noise wall that reduces the amount of interstate traffic noise created by the undertaking. Any visual effects will be minor, and commensurate with existing conditions, in which the elevated highway structure constitutes a visual barrier. The visual effects associated with the proposed noise wall will not have an adverse visual effect upon the district, as they will not compromise the integrity of the property. The noise wall will, however, reduce traffic noise within the district, thereby mitigating new and existing noise effects. The final design and aesthetics of the noise wall, including the option of no noise wall, will be determined through public involvement meetings to be held in the future. Consulting parties will also be involved in decisions regarding the noise wall. Following the conclusion of consultation, information on the appearance and aesthetics of the noise wall will be provided.

- Alternative I will not cause neglect of the historic property, causing its deterioration. The remaining contributing properties to the historic district will continue to function as a historic district.
- Alternative I will not result in the transfer, lease, or sale of a historic property out of Federal ownership or control.

Mitigation measures in response to the adverse effects on the Lewisburg Historic District will be designed in cooperation with the consulting parties.

9.2.8 KECL 817 - Boehmer Decorating Company

The resource is located at 533–535 Pike Street in Covington, Kentucky. The building is considered eligible for inclusion in the NRHP under Criterion A for its association with the NRHP-listed Bavarian Brewing Company. The building was used by the brewery during its period of significance.

The impact limits for Alternative I and improvements to Pike Street are located west and north of Resource KECL 817, and therefore, will not cause any direct effect upon the property. A one-story, ca. 1980, building (KY-127) west of KECL 817 will be demolished as part of this project. The demolition of this building will leave only vacant lots between KECL 817 and I-71/I-75. However, KECL 817 already has a direct view of I-71/I-75 because the interstate is elevated in this area and the building is also located on a slight incline, and therefore, the project will not adversely affect the setting of the resource. The photograph below was taken from the northwest corner of KECL 817 and shows the existing view of the I-71/I-75 corridor from the building. The one-story white building shown on the photograph is KY-127, which will be demolished as part of the project. The

removal of this building will give KECL 817 a larger view of the interstate from street level; however, since KECL 817 is a two-story building, the upper story already has a wider view of the corridor. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.



View of I-71/I-75 from KECL 817 – Bohmer Decorating Company, facing west.

9.2.9 KEC 462 - Glier's Goetta

The resource is located at 533 Goetta Place in Covington, Kentucky. The building is considered eligible under Criterion A for its association with the NRHP-listed Bavarian Brewing Company. The building was used as the bottling department for the brewery from 1903 until the brewery closed in 1919 for Prohibition.

The impact limits for Alternative I are located west of Resource KEC 462, and therefore, will not cause any direct effect upon the property. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.10 NRHP 96000281 - Bavarian Brewing Company

The Bavarian Brewing Company is located at 522 West KY 1120/12th Street in Covington, Kentucky. In 1996, the building was listed in the NRHP under Criterion A for

its association with Covington's brewery history. Reevaluation of the building showed the Bavarian Brewing Company retains historic integrity that qualified the building for inclusion in the NRHP.

The impact limits for Alternative I are located west of the Bavarian Brewing Company NRHP boundary, and therefore, will not cause any direct effect upon the property (shown on Exhibit 7). Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.11 KECL 621 - 504 West KY 1120/12th Street

The resource is located at 504 West KY 1120/12th Street in Covington, Kentucky. The building is considered eligible under Criterion C as a good example of Italianate Style architecture that retains historic integrity.

The impact limits for Alternative I are located southwest of Resource KECL 621, and therefore, will not cause any direct effect upon the property. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.12 KECL 626 - 514 West KY 1120/12th Street

The resource is located at 514 West KY 1120/12th Street in Covington, Kentucky. The building is considered eligible under Criterion C as a good example of Italianate Style architecture that retains historic integrity.

The impact limits for Alternative I are located southwest of Resource KECL 626, and therefore, will not cause any direct effect upon the property. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.13 KECL 628 - 516 West KY 1120/12th Street

The resource is located at 516 West KY 1120/12th Street in Covington, Kentucky. The building is considered eligible under Criterion C as a good example of Italianate Style architecture that retains historic integrity.

The impact limits for Alternative I are located southwest of Resource KECL 628, and therefore, will not cause any direct effect upon the property. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.14 KEC 456 - 1000 Emery Drive

Resource KEC 456 is located at 1000 Emery Drive in Covington, Kentucky. The building is considered eligible under Criterion C as an uncommon example of a stuccoed Gable Front house in Covington that retains historic features.

The impact limits for Alternative I are located north of Resource KEC 456, and therefore, will not cause any direct effect upon the property. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.15 KEC 459 - 509 St. Joseph Lane

Resource KEC 459 is located at the end of St. Joseph Lane in Covington, Kentucky. The apartment building is considered eligible for inclusion in the NRHP under Criterion C as an uncommon example of the Art Deco Style in the Covington area.

The impact limits for Alternative I are located south of Resource KEC 459, and therefore, will not cause any direct effect upon the property. An approximate 36 foot retaining wall will be constructed within the right-of-way of I-71/75 in the hillside below the resource. The construction of the retaining wall will eliminate the need to take the property to complete the project. This wall will not have any direct effect upon the resource as its location within the slope of the hillside will cause it not to be visible from the building. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.16 KEC 458 - 45 Rivard Drive

Resource KEC 458 is located at 45 Rivard Drive in Covington, Kentucky. The building is considered eligible for inclusion in the NRHP under Criterion C as a good example of the Tudor Revival Style that retains most of its historic integrity.

The impact limits for Alternative I are located northwest of Resource KEC 458 and therefore, will not cause any direct effect upon the property. An approximate 16 foot retaining wall will be constructed within the right-of-way of I-71/75 to the northwest of the building. The construction of the retaining wall will eliminate the need to take the property to complete the project. This wall will not have any direct effect upon the resource as the building's integrity of setting is already compromised by direct views of the highway and 6 foot fencing in the interstate right of way. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.17 KE 4 - Kennedy-Rivard Homestead

This resource at 50 Rivard Drive is considered eligible for inclusion in the NRHP under Criteria A, B, and C for its association with early settlement in the Covington, Kentucky area, for its association with the locally prominent Kennedy and Rivard families, and as a good example of the Italianate Style.

The Kennedy-Rivard Homestead is located adjacent to the impact limits of Alternative I. The undertaking of this project will not alter, directly or indirectly, any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.18 NRHP 89001169 - Fort Mitchell Heights Historic District

The Fort Mitchell Heights Historic District is located in Fort Mitchell, Kentucky and is roughly bounded by Park Road, Barrington Road, Dixie Highway, and Fortside Drive. In 1989, the district was listed in the NRHP under Criteria A and C for its significance in local community planning and development and for its significant examples of various architectural styles. Reevaluation of the district showed the Fort Mitchell Heights Historic District retains historic integrity that qualified the district for inclusion in the NRHP.

The Fort Mitchell Heights Historic District is located adjacent to the impact limits of Alternative I. The undertaking of this project will not alter, directly or indirectly, any of the characteristics of the historic district that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the district.

9.2.19 NRHP 89001170 - Old Fort Mitchell Historic District

The Old Fort Mitchell Historic District is located in Fort Mitchell, Kentucky and is roughly bounded by East Maple Avenue, Edgewood Road, Saint Johns Road, and Dixie Highway. In 1989, the district was listed in the NRHP under Criteria A and C for its significance in local community planning and development and for its significant examples of various architectural styles. Reevaluation of the district showed the Old Fort Mitchell Historic District retains historic integrity that qualified the district for inclusion in the NRHP.

The impact limits for Alternative I are located southeast of the Old Fort Mitchell Historic District, and therefore, will not cause any direct effect upon the district. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic district that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the district.

9.2.20 KEFM 317 - 2 East Orchard Road

This resource at 2 East Orchard Road is considered eligible for inclusion in the NRHP under Criterion C as a rare example of a ca. 1850 farmhouse in Fort Mitchell, Kentucky that retains most of its historic integrity.

The impact limits for Alternative I are located southeast of Resource KEFM 317, and therefore, will not cause any direct effect upon the property. Additionally, any indirect effects of this project will not alter any of the characteristics of the historic property that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, the project will have no effect on the property.

9.2.21 NRHP 89001585 - Highland Cemetery Historic District

The Highland Cemetery Historic District is located in Fort Mitchell, Kentucky and is roughly bounded by the I-71/I-75 corridor, Highland Pike, St. Mary's Cemetery, and Dixie Highway. In 1989, the district was listed in the NRHP under Criterion C for its significant architecture and landscape architecture plan. Reevaluation of the district showed the Highland Cemetery Historic District retains historic integrity that qualified the district for inclusion in the NRHP.

In the 1990s, an I-71/I-75 corridor realignment took a portion of the northwest boundary of the Highland Cemetery Historic District, which was incorporated into the current I-71/75 right-of-way. Alternative I is within the current I-71/75 right-of-way and will have no new effects upon the district.

10.0 PROPOSED TREATMENT PLANS FOR ADVERSE EFFECTS

This effort resulted in direct impacts to two historic resources. The resources are listed in the National Register of Historic Places (NRHP), Longworth Hall in Ohio (NRHP 86003521) and the Lewisburg Historic District in Kentucky (NRHP 93001165).

The effects on these properties are discussed in Section 9.0 and shown on Exhibits 5 and 6. The locations of the work limits and historic properties in Kentucky are shown on Exhibits 7A through 7J. Additional coordination with the State Historic Preservation Offices (SHPO) of Ohio and Kentucky as well as consulting parties will be undertaken to develop appropriate mitigation measures to address the adverse effects resulting from Alternative I to these resources as described in this document. Such efforts will be documented in detail under separate cover in a Memorandum of Agreement (MOA).

10.1 Longworth Hall

Alternative I would pass through 198 feet of the eastern end of the Longworth Hall building, requiring that three, 15-foot, two 13-foot, and six 12-foot bays of the building be demolished (Exhibit 5). Alternative I would eliminate a total of 20,000 square feet of floor space. This affected section of the building is that portion which was previously altered by reducing its length and adding a five-story 30,000 square foot brick addition. In order to mitigate these effects the following mitigation options are suggested:

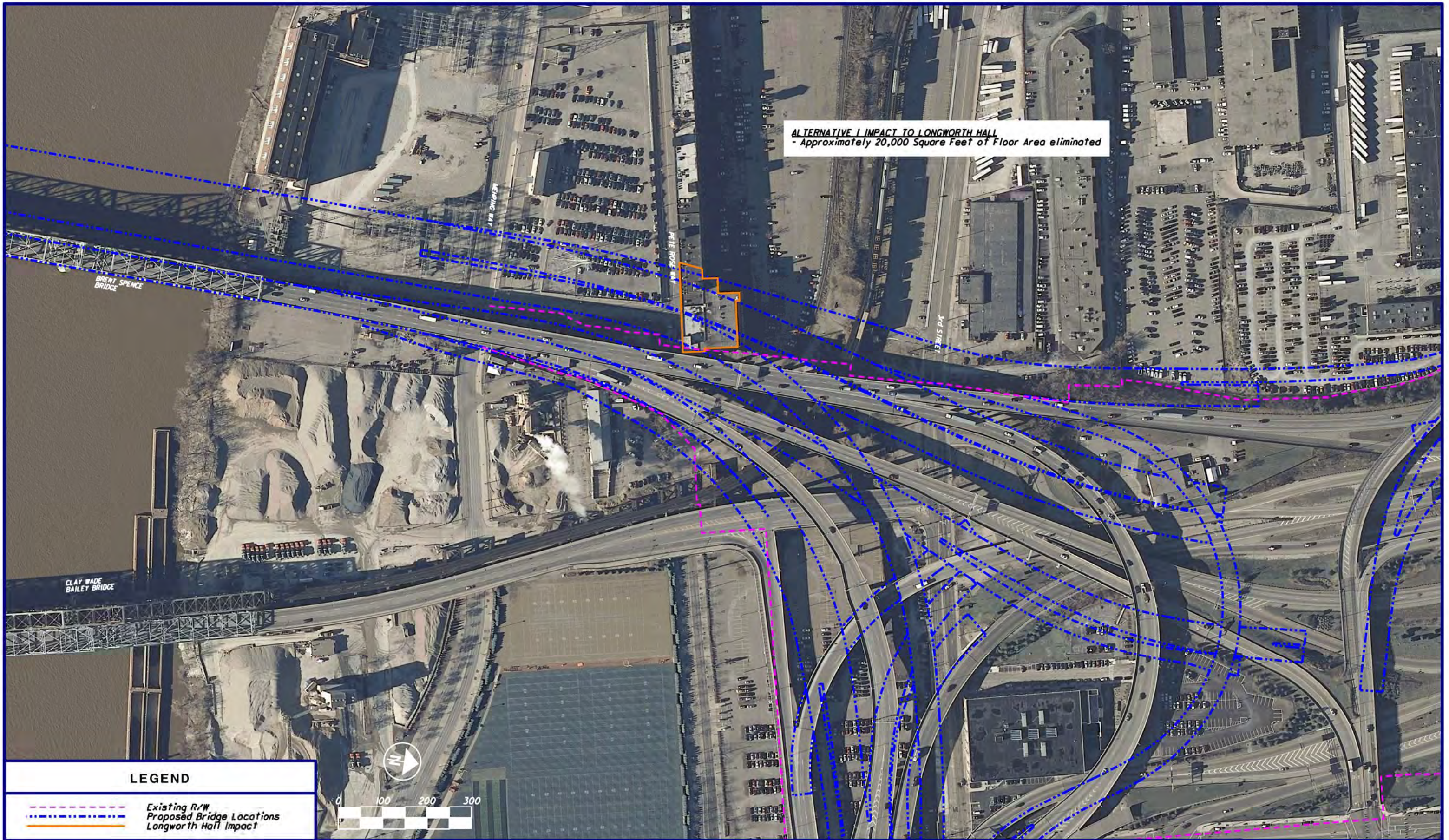
- Historic American Building Survey (HABS) Documentation of Longworth Hall.
- Reconstruct the portion of the fourth floor of the building that was demolished by fire, which would allow the building to regain historic integrity and floor space that will otherwise be lost during the construction of the bridge. This suggestion was made by Margo Warminski, with the Cincinnati Preservation Association.
- Installation of appropriate storm windows throughout the building to reduce traffic and ambient noise, reduce dust and debris from the roadway, and to protect the historic windows. This suggestion was made by Margo Warminski, with the Cincinnati Preservation Association.
- Rehabilitation of the associated scale house, located on the property north of Longworth Hall, for interpretative use.
- Contextual study of extant large scale railroad freight houses in Ohio.
- Plaque or commemorative display placed on or near the Longworth Hall building commemorating the historic significance of the property.

10.2 Lewisburg Historic District

Alternative I would require the acquisition of 2.1 acres of land within the Lewisburg Historic District boundary, affecting 28 of the 430 properties that are considered to be contributing elements to the historic district (Exhibits 6 and 7F). Twenty-one parcels would be acquired as total right-of-way acquisitions with demolition of structures. Seven additional parcels would be affected through a partial or strip-take right-of-way acquisition of land, which will not require the taking of any buildings on the parcel. The addition of a retaining wall east of Crescent Avenue will allow this street to remain open to vehicular traffic. However, Lewis Street, which provides access to the historic district,

would be closed at Pike Street (Exhibit 7F). Mitigation measures in response to the adverse effects on the Lewisburg Historic District will be designed in cooperation with the consulting parties.

ALTERNATIVE 1 IMPACT TO LONGWORTH HALL
- Approximately 20,000 Square Feet of Floor Area eliminated



LEGEND

- Existing R/W
- Proposed Bridge Locations
- Longworth Hall Impact

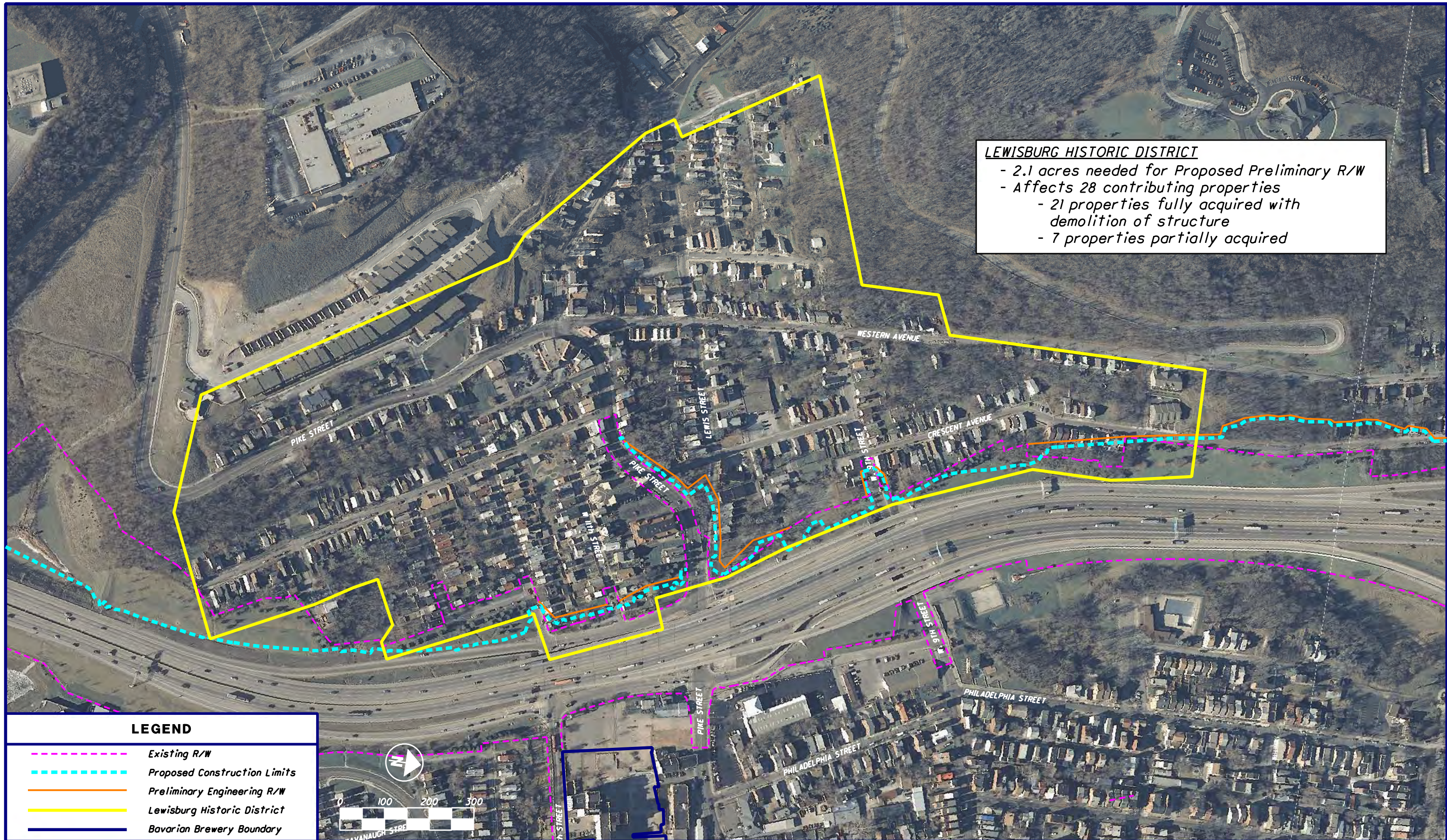
U.S. Department of Transportation
Federal Highway Administration



**CONSTRUCTION IMPACTS
TO LONGWORTH HALL**

EXHIBIT

5



LEWISBURG HISTORIC DISTRICT











- 2.1 acres needed for Proposed Preliminary R/W
- Affects 28 contributing properties
 - 21 properties fully acquired with demolition of structure
 - 7 properties partially acquired

LEGEND

- - - Existing R/W
- - - Proposed Construction Limits
- Preliminary Engineering R/W
- Lewisburg Historic District
- Bavarian Brewery Boundary





LEGEND			
	WORK LIMITS		CONTRIBUTING TO HISTORIC DISTRICT
	BUILDING TAKE		NON-CONTRIBUTING TO HISTORIC DISTRICT
	LAND TAKE		NON-HISTORIC PROPERTY
	PARCEL LINES		HISTORIC PROPERTY
	EXISTING RIGHT OF WAY		POTENTIAL RETAINING WALL



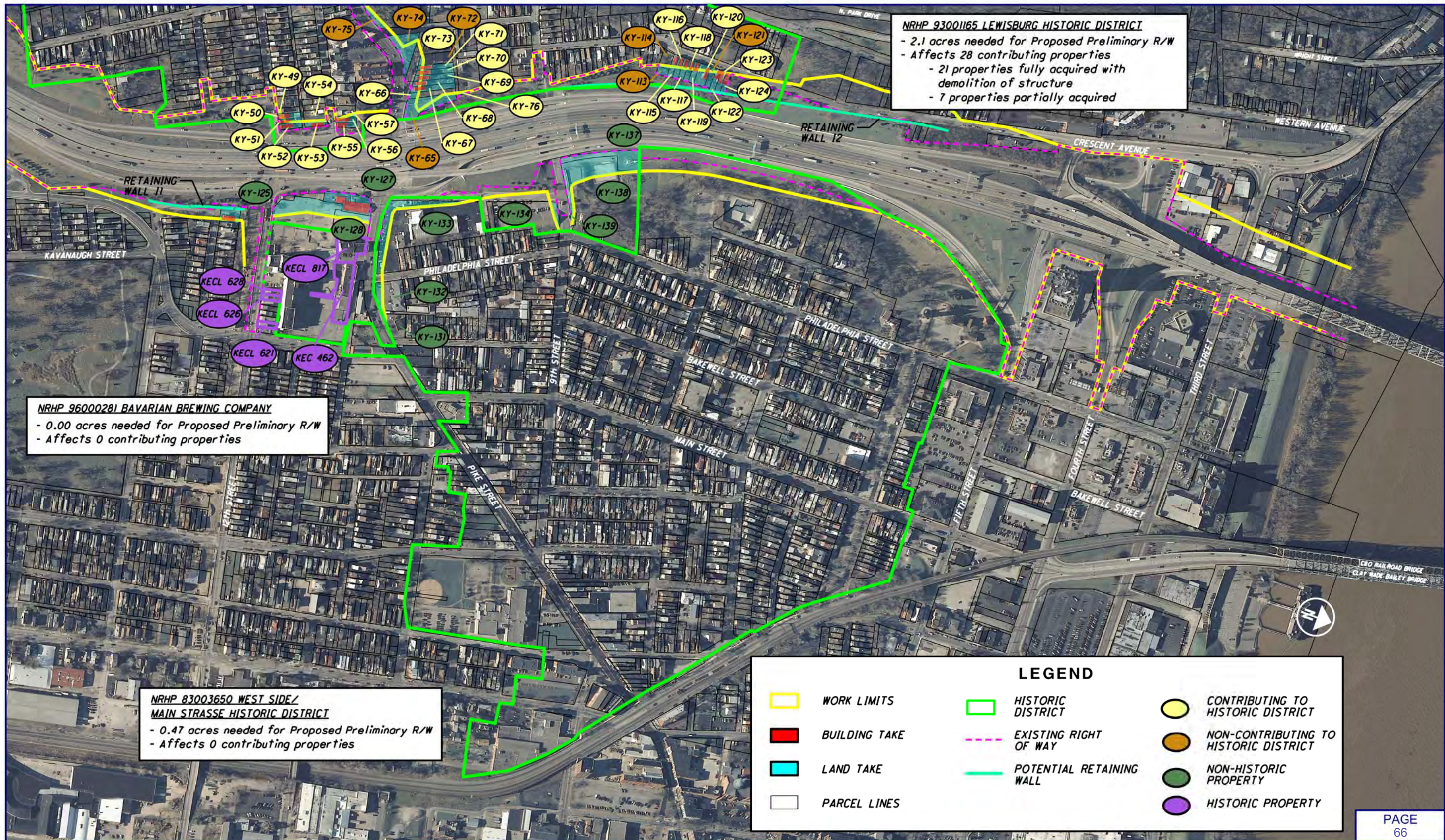
NRHP 90000481 KENNEY'S CROSSING
 - 0.00 acres needed for Proposed Preliminary R/W
 - Affects 0 contributing properties

LEGEND			
	WORK LIMITS		CONTRIBUTING TO HISTORIC DISTRICT
	BUILDING TAKE		NON-CONTRIBUTING TO HISTORIC DISTRICT
	LAND TAKE		NON-HISTORIC PROPERTY
	PARCEL LINES		HISTORIC PROPERTY
	EXISTING RIGHT OF WAY		POTENTIAL RETAINING WALL

WRP 9300165 LEWISBURG HISTORIC DISTRICT
 - 2.1 acres needed for Proposed Preliminary R/W
 - Affects 28 contributing properties
 - 21 properties fully acquired with demolition of structure
 - 7 properties partially acquired



LEGEND			
	WORK LIMITS		HISTORIC DISTRICT
	BUILDING TAKE		EXISTING RIGHT OF WAY
	LAND TAKE		POTENTIAL RETAINING WALL
	PARCEL LINES		CONTRIBUTING TO HISTORIC DISTRICT
			NON-CONTRIBUTING TO HISTORIC DISTRICT
			NON-HISTORIC PROPERTY
			HISTORIC PROPERTY



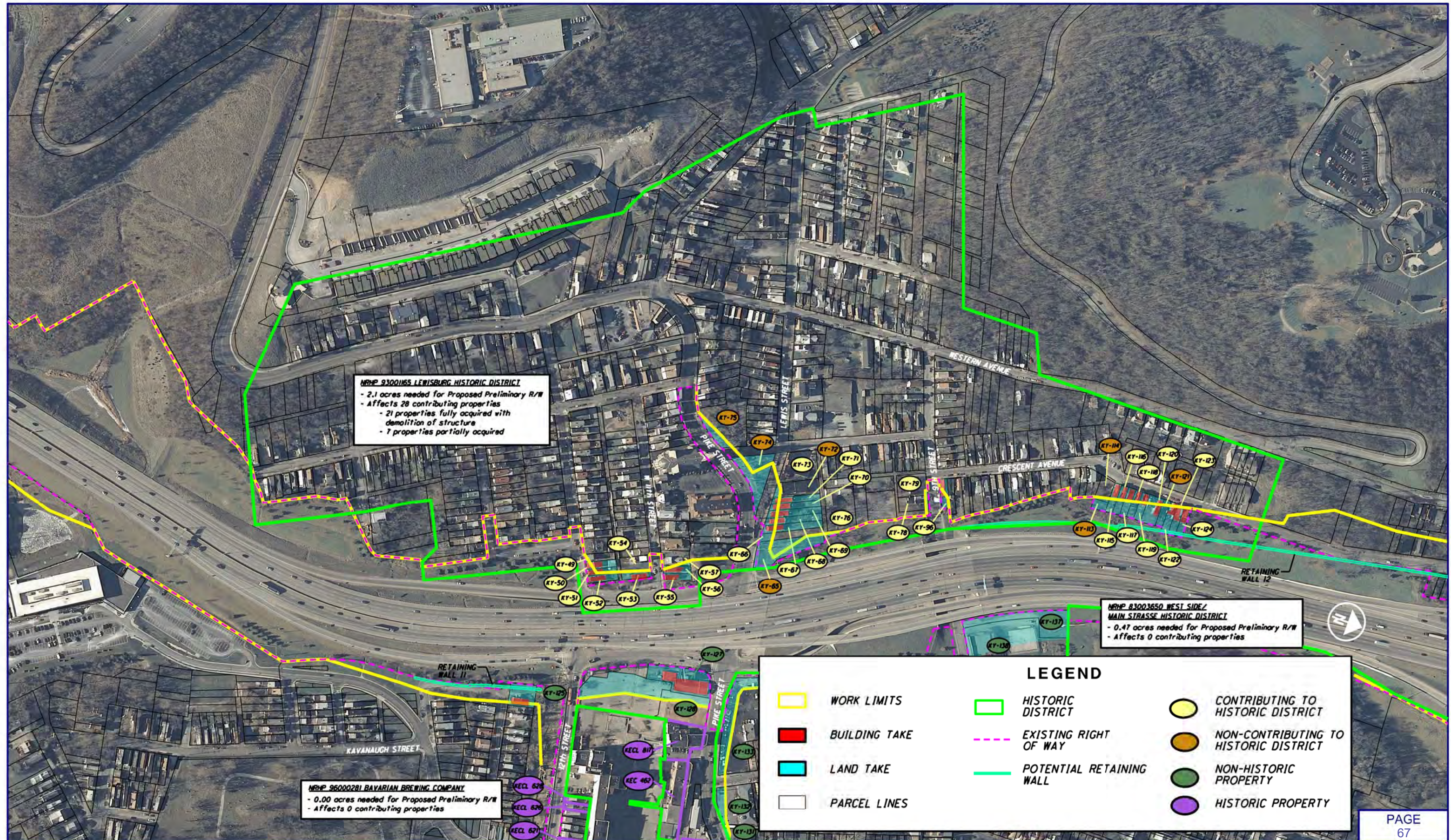
NRHP 93001165 LEWISBURG HISTORIC DISTRICT
 - 2.1 acres needed for Proposed Preliminary R/W
 - Affects 28 contributing properties
 - 21 properties fully acquired with demolition of structure
 - 7 properties partially acquired

NRHP 9600281 BAVARIAN BREWING COMPANY
 - 0.00 acres needed for Proposed Preliminary R/W
 - Affects 0 contributing properties

**NRHP 83003650 WEST SIDE/
 MAIN STRASSE HISTORIC DISTRICT**
 - 0.47 acres needed for Proposed Preliminary R/W
 - Affects 0 contributing properties

LEGEND

WORK LIMITS	HISTORIC DISTRICT	CONTRIBUTING TO HISTORIC DISTRICT
BUILDING TAKE	EXISTING RIGHT OF WAY	NON-CONTRIBUTING TO HISTORIC DISTRICT
LAND TAKE	POTENTIAL RETAINING WALL	NON-HISTORIC PROPERTY
PARCEL LINES		HISTORIC PROPERTY



NRHP 9300165 LEWISBURG HISTORIC DISTRICT
 - 2.1 acres needed for Proposed Preliminary R/W
 - Affects 28 contributing properties
 - 21 properties fully acquired with demolition of structure
 - 7 properties partially acquired

**NRHP 83003650 WEST SIDE/
 MAIN STRASSE HISTORIC DISTRICT**
 - 0.47 acres needed for Proposed Preliminary R/W
 - Affects 0 contributing properties

NRHP 96000281 BAVARIAN BREWING COMPANY
 - 0.00 acres needed for Proposed Preliminary R/W
 - Affects 0 contributing properties

LEGEND

WORK LIMITS	HISTORIC DISTRICT	CONTRIBUTING TO HISTORIC DISTRICT
BUILDING TAKE	EXISTING RIGHT OF WAY	NON-CONTRIBUTING TO HISTORIC DISTRICT
LAND TAKE	POTENTIAL RETAINING WALL	NON-HISTORIC PROPERTY
PARCEL LINES		HISTORIC PROPERTY

NRHP 93001165 LEWISBURG HISTORIC DISTRICT

- 2.1 acres needed for Proposed Preliminary R/W
- Affects 28 contributing properties
 - 21 properties fully acquired with demolition of structure
 - 7 properties partially acquired

NRHP 83003650 WEST SIDE/MAIN STRASSE HISTORIC DISTRICT

- 0.47 acres needed for Proposed Preliminary R/W
- Affects 0 contributing properties

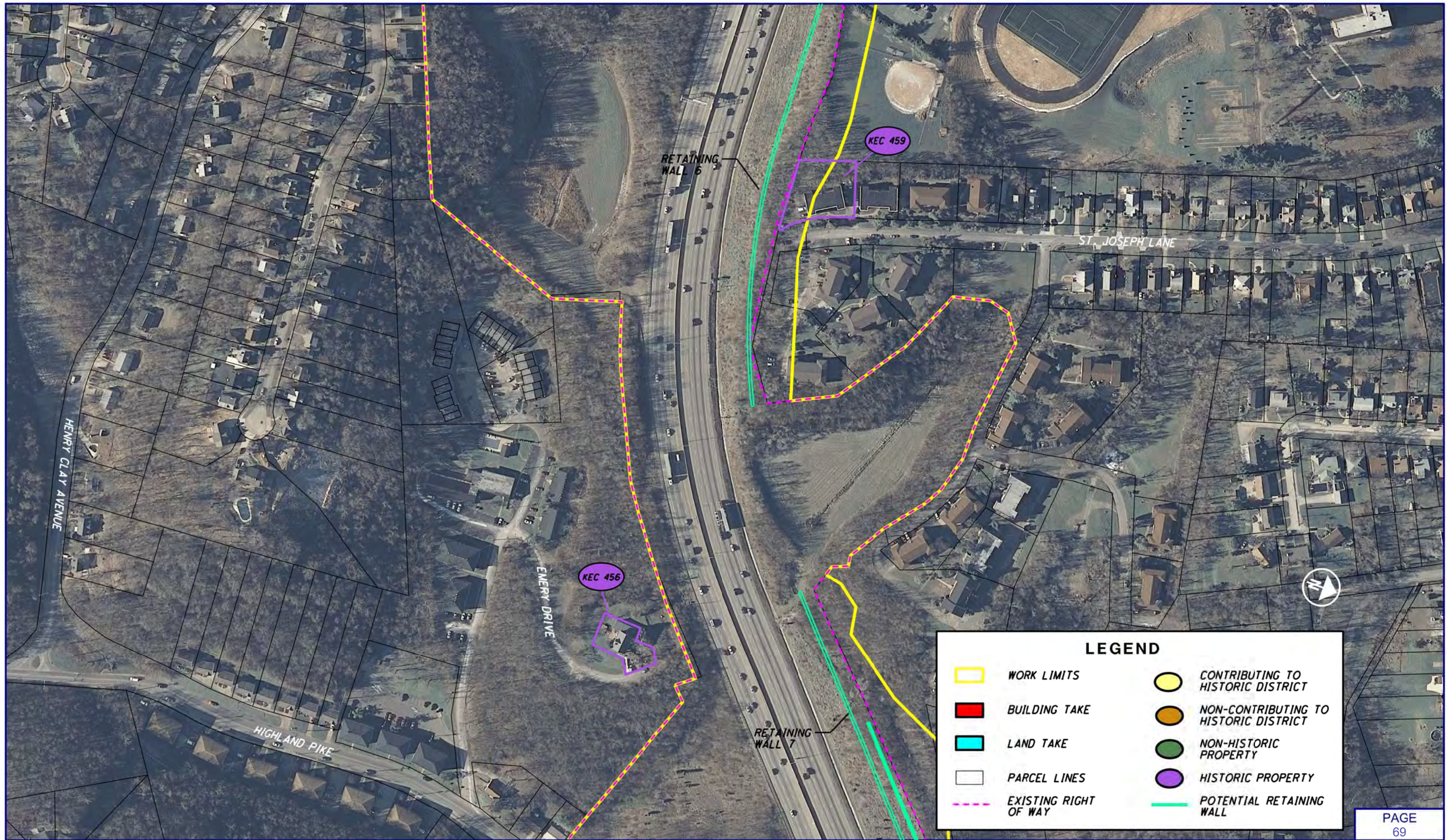
NRHP 96000281 BAVARIAN BREWING COMPANY

- 0.00 acres needed for Proposed Preliminary R/W
- Affects 0 contributing properties



LEGEND

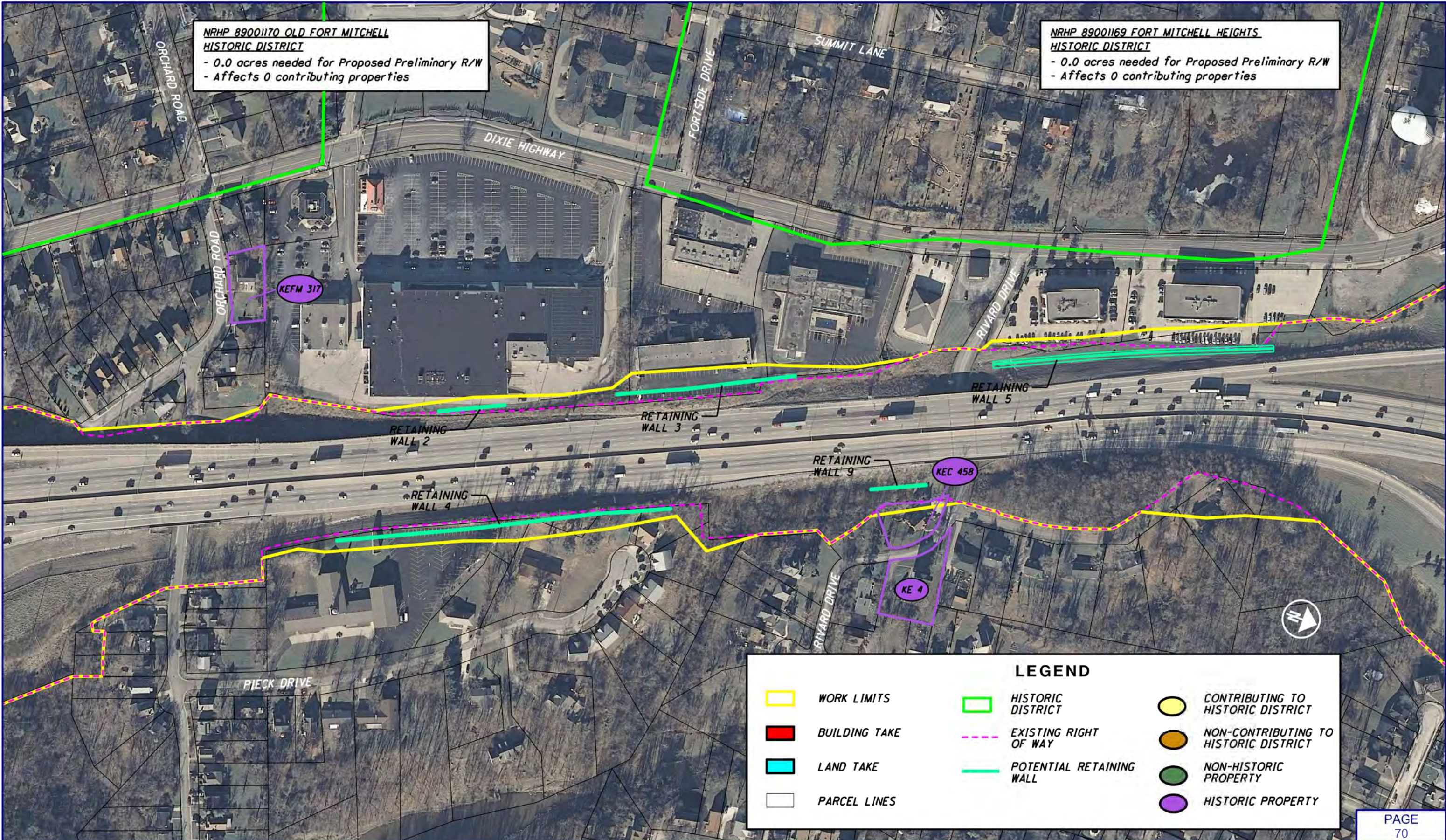
WORK LIMITS	HISTORIC DISTRICT	CONTRIBUTING TO HISTORIC DISTRICT
BUILDING TAKE	EXISTING RIGHT OF WAY	NON-CONTRIBUTING TO HISTORIC DISTRICT
LAND TAKE	POTENTIAL RETAINING WALL	NON-HISTORIC PROPERTY
PARCEL LINES		HISTORIC PROPERTY



LEGEND	
	WORK LIMITS
	BUILDING TAKE
	LAND TAKE
	PARCEL LINES
	EXISTING RIGHT OF WAY
	CONTRIBUTING TO HISTORIC DISTRICT
	NON-CONTRIBUTING TO HISTORIC DISTRICT
	NON-HISTORIC PROPERTY
	HISTORIC PROPERTY
	POTENTIAL RETAINING WALL

NRHP 89001170 OLD FORT MITCHELL HISTORIC DISTRICT
 - 0.0 acres needed for Proposed Preliminary R/W
 - Affects 0 contributing properties

NRHP 89001169 FORT MITCHELL HEIGHTS HISTORIC DISTRICT
 - 0.0 acres needed for Proposed Preliminary R/W
 - Affects 0 contributing properties




LEGEND			
	WORK LIMITS		HISTORIC DISTRICT
	BUILDING TAKE		EXISTING RIGHT OF WAY
	LAND TAKE		POTENTIAL RETAINING WALL
	PARCEL LINES		CONTRIBUTING TO HISTORIC DISTRICT
			NON-CONTRIBUTING TO HISTORIC DISTRICT
			NON-HISTORIC PROPERTY
			HISTORIC PROPERTY

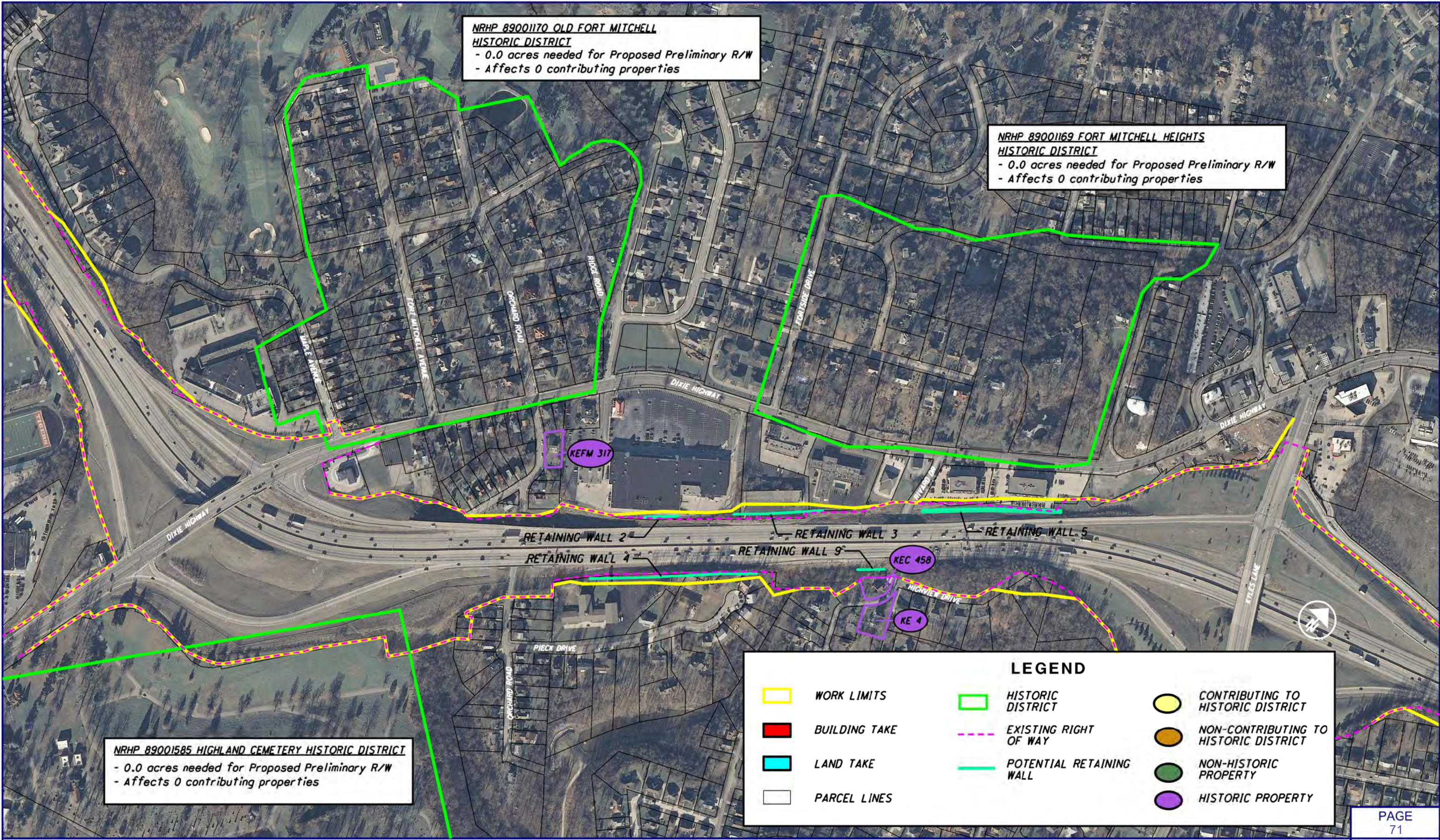
NRHP 89001170 OLD FORT MITCHELL HISTORIC DISTRICT
 - 0.0 acres needed for Proposed Preliminary R/W
 - Affects 0 contributing properties

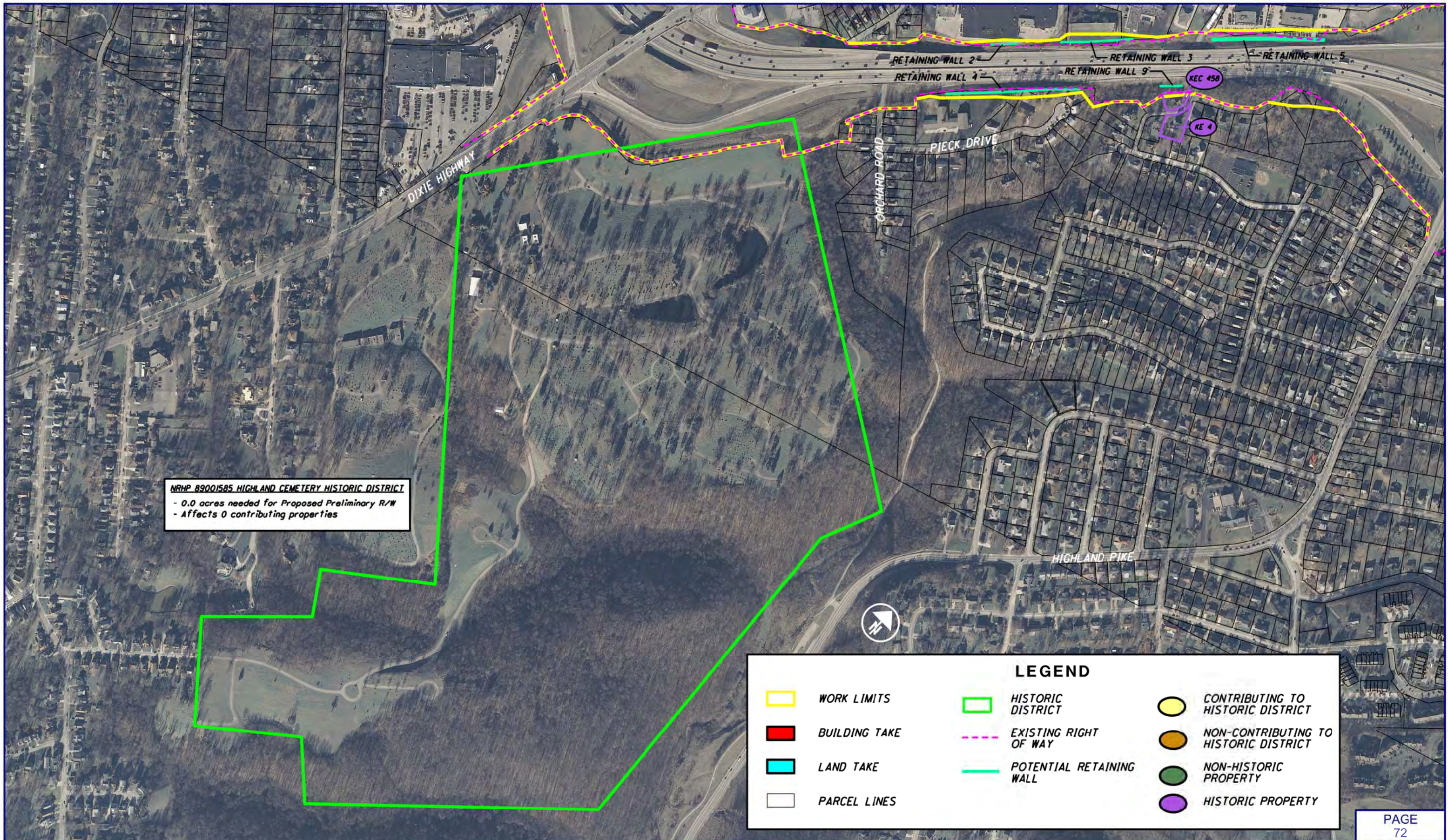
NRHP 89001169 FORT MITCHELL HEIGHTS HISTORIC DISTRICT
 - 0.0 acres needed for Proposed Preliminary R/W
 - Affects 0 contributing properties

NRHP 89001585 HIGHLAND CEMETERY HISTORIC DISTRICT
 - 0.0 acres needed for Proposed Preliminary R/W
 - Affects 0 contributing properties

LEGEND

 WORK LIMITS	 HISTORIC DISTRICT	 CONTRIBUTING TO HISTORIC DISTRICT
 BUILDING TAKE	 EXISTING RIGHT OF WAY	 NON-CONTRIBUTING TO HISTORIC DISTRICT
 LAND TAKE	 POTENTIAL RETAINING WALL	 NON-HISTORIC PROPERTY
 PARCEL LINES		 HISTORIC PROPERTY





NRHP 89001585 HIGHLAND CEMETERY HISTORIC DISTRICT
 - 0.0 acres needed for Proposed Preliminary R/W
 - Affects 0 contributing properties

LEGEND			
	WORK LIMITS		HISTORIC DISTRICT
	BUILDING TAKE		EXISTING RIGHT OF WAY
	LAND TAKE		POTENTIAL RETAINING WALL
	PARCEL LINES		CONTRIBUTING TO HISTORIC DISTRICT
			NON-CONTRIBUTING TO HISTORIC DISTRICT
			NON-HISTORIC PROPERTY
			HISTORIC PROPERTY

11.0 PUBLIC INVOLVEMENT AND AGENCY COORDINATION

Public participation for the Brent Spence Bridge Replacement/Rehabilitation Project has been in accordance with Ohio Department of Transportation's (ODOT) Major Project Development Process (PDP). Public involvement was initiated in Step 1 of the PDP and will continue through to Step 14 of the process. In Kentucky, public involvement has been in accordance with the Kentucky Transportation Cabinet's (KYTC) Project Delivery Core Process. Public involvement was initiated during the Transportation Decision Making Process and will continue through project development. All public involvement activities are communicated to, approved by, and coordinated through the project managers for KYTC and ODOT.

A Public Involvement Plan (PIP) was prepared for the Brent Spence Bridge Replacement/Rehabilitation Project for Steps 1 through 4 of the PDP, and updated in Step 5. KYTC and ODOT recognize that a proactive, effective communications effort will enhance this project's outcome. Soliciting ideas and input from stakeholders and residents will provide the constructive feedback necessary for the successful implementation of needed transportation improvements. A coordinated communications program also educates the public on the long-term benefits of the infrastructure improvements under consideration, such as increased travel safety and improved mobility.

All informational materials are updated as new information becomes available to keep information accurate and to ensure up-to-date communication is being maintained. Since public involvement is a fluid process, all communication tools used in this plan must remain flexible to meet the changing needs of the Advisory Committee and the general public. The following lists a summary of the public involvement activities that have taken place:

- Establishment of project identity,
- Establishment of an Advisory Committee,
 - Advisory Committee meetings
 - Advisory Committee survey
- Establishment of an Aesthetic Committee,
- Identification and engagement of environmental justice populations,
- Stakeholder meetings,
- Community meetings and presentations,
- Public meetings,
- Project newsletters and E-newsletters,
- Website coordination,
- Media relations,
- Project fact sheets, and
- Roving information display

11.1 Project Website, Newsletters, and Media

11.1.1 Project Website

The project website established for the Brent Spence Bridge Replacement/Rehabilitation Project is www.brentspencebridgecorridor.com. The website has been active and media coverage of alternatives and other elements of the project have generated an increase in website visits and web comments. The website is updated to reflect the latest information and technical reports associated with the project development. The project website includes a feedback link that provides an opportunity for anyone to make comments and ask questions about the project.

11.1.2 Project Newsletters

Two traditional newsletters were prepared and distributed to approximately 250 individuals and organizations to date. The first newsletter was mailed in February 2006 and provided background, project purpose, contact information, project schedule, a list of Advisory Committee member organizations, and a map of the project study area. The second was mailed in January 2007 and provided details about the alternatives that were carried forward through Step 4.

E-Newsletters were developed to facilitate communications with the Advisory Committee between general mail newsletters, public meetings, and Advisory Committee meetings. The first E-Newsletter was sent out in June 2007 and the second in August 2007. A third was distributed in advance of the Concurrence Point #2 public meetings in May 2009. Since August 2009, E-newsletters have been distributed monthly.

11.1.3 Media Relations

The media has provided positive support and accurate communication about the Brent Spence Bridge Replacement/Rehabilitation Project. It has been on the front page of various local news publications numerous times, primarily because of the scale and magnitude of the project. The coverage of the conceptual alternatives and potential design concepts for the project has been moderate. The announcement of the recommended conceptual alternatives for the project generated a significant amount of media interest. However, as cost estimates have been developed there has been an increase in concern regarding project costs and funding sources.

As the project moves forward, media relations will be maintained in order to provide information to the media so they can help communicate any messages that are important in obtaining community response. Contact with reporters is maintained by KYTC, ODOT, and the Project Team.

11.1.4 Roving Project Display

A project display was developed and available to the public at public buildings and high traffic areas within the study area with the purpose of extending project outreach efforts. This display appeared at public buildings and high traffic areas throughout 2006. Currently, the project display is used on an as needed basis.

11.2 Advisory and Aesthetic Committees

At the outset of the project, KYTC and ODOT instituted two committees to help provide guidance to the Project Team. The Advisory Committee provides input from local community and political leaders on community issues and concerns. This provides an opportunity for important issues brought up to the Advisory Committee to be communicated back to the contingencies represented by the members of the Advisory Committee.

The Project Aesthetics Committee, a sub-committee of the Advisory Committee, provides local input on the design and aesthetic appearance of the corridor and the main span of the Brent Spence Bridge. As the project moves forward, more detail is provided to and from this committee in order to give input on community values with respect to the aesthetics of the bridge.

11.2.1 Advisory Committee

A total of seven Advisory Committee meetings have been held to date:

- August 19, 2005
- October 13, 2005
- March 23, 2006
- July 27, 2006
- February 25, 2008
- April 20, 2009
- December 17, 2010

Agendas and meeting minutes for each Advisory Committee Meeting are posted to the project website.

11.2.2 Aesthetic Committee

Two Project Aesthetic Committee (PAC) meetings were held during Steps 1 through 5 of the PDP. The first meeting was held on December 16, 2005 and the second on August 29, 2006. Agendas and meeting minutes for each Aesthetic Committee meeting are posted to the project website.

Four PAC meetings were held during Steps 6 and 7 of the PDP to select the design for the new Ohio River crossing. These meetings focused on KYTC's Bridge Type Selection Process conducted for the new Ohio River Bridge. The Bridge Type Selection Process is a three step process, which involves developing and analyzing numerous bridge concepts leading to a recommendation of three final bridge type alternatives. The meetings were held on September 25, 2009, January 29, 2010, April 15, 2010, and September 20, 2010. Summaries of these four PAC meetings are presented in Table 3.

Table 3. Project Aesthetic Committee Meetings

Meeting Date	Meeting Summary
September 25, 2009	<ul style="list-style-type: none"> • Context of aesthetics in the project study area was presented • Key design criteria for the project was developed • Bridge types feasible for this location were shown, including cable-stayed, arch, and truss • Suspension bridge type is not feasible
January 29, 2010	<ul style="list-style-type: none"> • Twelve bridge concepts were presented • Committee members completed a criteria matrix for the 12 bridge concepts • Preference stated for cable-stayed bridges is a harp arrangement paired with a Pratt truss with stays parallel to the truss diagonals • Double-deck truss style bridge was not preferred • Two-legged cable-stayed towers are generally preferred over a three-legged tower option
April 15, 2010	<ul style="list-style-type: none"> • Receive feedback on six bridge type alternatives to select three final bridge alternatives • Committee presented more details of the six bridge type alternatives • Key visual and aesthetic criteria were provided to committee which was then used to evaluate the six bridge type alternatives • Cable-stayed bridges were more favorably received than the arch bridges • Aesthetics not related to the actual bridge structure were noted as just as important as the bridge aesthetics • Costs of bridges were noted as a concern
September 20, 2010	<ul style="list-style-type: none"> • Discuss aesthetic treatment of the I-75 corridor • Receive feedback for possible themes that could be applied to the project • Provide examples of project design themes, elements and treatments • Brainstorm potential aesthetic ideas

In addition, a survey was sent the Aesthetic Committee on November 9, 2010. The purpose of the survey was:

- to identify the one unifying theme for the entire corridor as well as themes for each state; and
- to develop preferences for aesthetic design elements of the project.

11.3 Public Meetings

A series of public meetings have been held for both Concurrence Point #1 to present the work completed in Steps 1 through 4 of the PDP and for Concurrence Point #2 to present the work completed up through Step 5 of the ODOT PDP.

Two public meetings were held for Concurrence Point #1 on May 2 and 4, 2006. These public meetings were held to present work completed in Steps 1 through 4 of the PDP.

The purpose of the meetings was to inform the public about the *Purpose and Need Statement* (April 2006), *Red Flag Summary* (December 2005), *Existing and Future Conditions* (February 2006), and *Conceptual Alternatives Solutions*.

Based on the public comments received, there was a general consensus that improvements are needed in the I-75 corridor. The comments provided by the public and community representatives from Concurrence Point #1 were used to refine the conceptual alternatives throughout Step 5.

Two meetings were held for Concurrence Point #2 on May 6 and 7, 2009 to present the conceptual alternatives for the project. These meetings presented the feasible alternatives recommended for further study and the results of the *Conceptual Alternatives Study*.

11.4 Public Hearings

Public hearings will be conducted at the end of Steps 6 and 7 of the PDP. These hearings will be advertised through notices in newspapers and methods previously used to advertise public meetings for the project. The focus of the hearings will be the selection of the recommended Preferred Alternative for the highway and the new bridge crossing over the Ohio River. The purpose of the hearings is to provide the public the opportunity to comment on the recommended Preferred Alternative, its impacts, and proposed mitigation strategies.

There will be two public hearings, one in Kentucky and one in Ohio. The information presented and the format of each hearing will be the same. An open house format will begin each public hearing, during this time the public will be able to view displays which illustrate alternatives, their impacts, proposed mitigation, and other important aspects of the project. A formal presentation will be given by the Project Team, which will be followed by a comment session. The public will be encouraged to provide written and/or verbal comments. A court reporter will be available to record verbal comments. A comment period of at least 14 days will follow the public hearings.

There will be a minimum 30-day comment period following the release of the Environmental Assessment (EA) prepared for this project during which the public and agencies will be given the opportunity to comment on the alternatives, the potential impacts, and proposed mitigation measures. The EA will be made available to the public in hard copy format at a number of accessible locations. The document will also be made available electronically in a common format (PDF) on the project, KYTC's and ODOT's websites. Paper and/or electronic data (CD-ROM) copies will be provided to representatives of the agencies and organizations as identified by KYTC and ODOT.

11.5 Public Comments

During Steps 6 and 7 of the PDP, the public was asked to comment on the bridge types developed for the project. KYTC's Bridge Type Selection Process was conducted for the new Ohio River Bridge to select the best design for the new Ohio River crossing. The following sections present the public comments received to date from Bridge Type Selection Process.

11.5.1 Step 1 Bridge Type Comments

The first activity of the Bridge Type Selection Process was a meeting with the Project Aesthetic Committee (PAC). On September 25, 2009, the project team met with the PAC to develop key visual and aesthetic criteria, which would be used to assist with evaluating bridge concepts developed during Step 1. Five key visual and aesthetic criteria were developed as a result of the PAC meeting. The five key criteria were:

- The new bridge should be visually attractive,
- The new bridge needs to be visible looking “through” the existing bridge (from the east),
- As much as possible, crossing the new bridge should allow views of the surrounding context (unlike existing bridge),
- The new bridge should have distinctive characteristics that identify it as a local landmark, and
- The new bridge should have a visual relationship with the existing bridge.

A total of 24 bridge concepts were developed during Step 1. Through a series of meetings, the Federal Highway Administration (FHWA), ODOT, and KYTC identified 12 bridge concepts which met the purpose and needs of the project. These bridge concepts consisted of two truss bridges, three arch bridges and seven cable-stayed bridges.

11.5.2 Step 2 Bridge Type Comments

The 12 bridge concepts were presented to a combined meeting of the PAC, Project Advisory Committee and posted on the project website to solicit public comment. Comments were received via email, faxes, phone calls, and postings to the project website. The comments were analyzed and used to quantify the trends in the public’s preferences and concerns regarding the overall project and the various bridge concepts. As a result of these activities, six alternatives were recommended for further study in Step 3 of the process:

11.5.3 Step 3 Bridge Type Comments

The six bridge type alternatives were presented to a combined meeting of the PAC and Project Advisory Committee on April 15, 2010 and posted on the project website. Additionally, a press release was issued to notify the public of the opportunity to provide comments on the alternatives. The public comments received were analyzed and used to quantify trends for the public’s preferences and concerns regarding the overall project and for the various bridge concepts.

A comparative analysis was completed for the six bridge type alternatives with respect to construction cost; constructability/construction time; maintenance and durability; major rehabilitation feasibility; maintenance of traffic; and public comment. Based on this comparative analysis, it was recommended that Alternatives 1, 3, and 6 be the final three bridge alternatives selected to proceed to preliminary design during Step 3 of the Bridge Type Selection Process.

In addition, a survey was sent the Aesthetic Committee on November 9, 2010. The purpose of the survey was two-fold: 1) to identify the one unifying theme for the entire

corridor as well as themes for each state and 2) develop preferences for aesthetic design elements of the project.

The selection of the new Ohio River Bridge will be determined following the public hearing, and the results of the Aesthetic Design survey will be incorporated into the project construction documents during detailed design.

11.6 Presentations and Meetings with Stakeholders

Project managers from KYTC and ODOT have met individually with local government officials, residential organizations, professional societies, and other interested parties in the Greater Cincinnati/Northern Kentucky region to discuss the project, answer questions, and address concerns (Table 4).

Table 4. Project Meetings and Presentations within the Greater Cincinnati-Northern Kentucky area

Date	Organization
March 15, 2007	American Society of Civil Engineers
March 22, 2007	Lewisburg Neighborhood Association
May 1, 2007	Northern Kentucky Sanitation District #1
July 27, 2007	City of Covington
September 12, 2007	City of Covington/City of Cincinnati
January 11, 2008	City of Covington/City of Cincinnati
May 15, 2008	Special Stakeholder Meeting
May 22, 2008	City of Covington
May 29, 2008	Lewisburg/Downtown Covington/Botany Hill Neighborhood Associations
June 6, 2008	Northern Kentucky Developers Day
June 24, 2008	Transportation and Infrastructure Subcommittee of Cincinnati City Council
August 25, 2008	City of Covington
March 2, 2010	Cincinnati Transportation and Infrastructure Subcommittee
April 1, 2010	City of Covington
April 7, 2010	American Council of Engineering Companies of Ohio
May 13, 2010	City of Cincinnati
May 24, 2010	Ohio Kentucky Indiana Regional Council of Governments Bridge Builders
June 10, 2010	American Society of Highway Engineers 2010 National Conference
June 15, 2010	City of Covington Caucus
August 24, 2010	Covington City Council
September 16, 2010	Botany Hills Neighborhood Association
September 23, 2010	City of Covington Business Council
October 6, 2010	American Public Works Association –Kentucky Chapter
October 12, 2010	Ft. Wright Broker Breakfast
October 13, 2010	Cincinnati Bar Association Environmental Law Seminar
October 27, 2010	Northern Kentucky Area Planning Commission
November 3, 2010	Ft. Wright City Council
November 16, 2010	Cincinnati Museum Center at Union Terminal
November 18, 2010	City of Covington
December 1, 2010	University of Cincinnati
February 17, 2011	American Society of Civil Engineers

11.7 Agency Coordination

An important element of the environmental process is the integration of the National Environmental Policy Act (NEPA) with other planning and environmental review procedures required by law or agency practice (i.e. Section 106 of the National Historic Preservation Act). KYTC, ODOT, and the FHWA have entered into agreements with federal and state resource agencies in an effort to standardize procedures for environmental investigations and project reviews, streamline the review process, and develop mitigation measures.

11.7.1 Participating and Cooperating Agencies

In accordance with Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), an Agency Coordination Plan was developed. As part of the Agency Coordination Plan, KYTC, ODOT, and FHWA invited federal, state, and local agencies to participate in the project. Agencies responded either by letter or e-mail accepting or declining the invitation to participate. Table 5 provides a list of agencies invited and whether or not they accepted the invitation to participate in the Brent Spence Bridge Replacement/ Rehabilitation Project.

Table 5. Agencies Invited to Participate

Agencies	Participating (Yes or No)
Federal	
Federal Emergency Management Agency	No
Federal Transit Administration	No
US Army Corps of Engineers	Yes
US Coast Guard	Yes
US Environmental Protection	Yes
US Fish and Wildlife Service	Yes
Ohio	
Ohio Department of Agriculture	No
Ohio Department of Natural Resources	Yes
Ohio Environmental Protection Agency	Yes
Ohio Historic Preservation Office	No
Kentucky	
Environmental and Public Protection Cabinet	No
Kentucky Cabinet for Economic Development	No
Kentucky Department of Agriculture	No
Kentucky Department Environmental Protection	Yes
Kentucky Department of Fish and Wildlife Resources	Yes
Kentucky Department of Natural Resources	No
Kentucky Environmental Education Council	No
Kentucky Environmental Quality Commission	No
Kentucky Heritage Council, State Historic Preservation Office	No
Office for Consumer & Environmental Protection	No
State Nature Preserves Commission	No

11.7.2 Natural Resources Coordination

During development of the *Red Flag Summary Report* (December 2005) coordination was initiated with federal and state natural resources agencies regarding ecological resources (Table 6). Coordination with these agencies continued throughout the PDP.

In a letter dated August 16, 2006, the US Fish and Wildlife Service (USFWS) Reynoldsburg, Ohio Office accepted the invitation to act as a participating agency and further noted that they would serve as the lead USFWS field office on the project.

Two ecological reports *Level One Ecological Survey Report – Ohio* (ODOT PID No. 75119) (March 2010) and *Ecological Survey Report – Kentucky* (KYTC Item No.6-17) (February 2010) were distributed to federal and state natural resources agencies in each respective state in April 2010. A list of agency coordination letters received and a summary of their comments regarding the ecological reports are provided in Table 7.

Table 6. Natural Resources Agency Coordination Steps 1-5

Agency	Coordination
<ul style="list-style-type: none"> • Ohio Department of Natural Resources • Kentucky Department of Fish and Wildlife Resources (KDFWR) • US Fish and Wildlife Service 	<p>Contacted to determine the presence of unique or significant ecological resources such as threatened and/or endangered species, champion trees, geologic features, natural preserves, state parks, forested or wildlife areas, breeding or non-breeding animal concentrations and rare habitat.</p>
<ul style="list-style-type: none"> • US Coast Guard 	<p>Contacted to initiate coordination on pier placement and navigation requirements for new Ohio River Bridge options.</p>
<ul style="list-style-type: none"> • US Environmental Protection Agency • Ohio Environmental Protection Agency (OEPA) • Kentucky Department of Environmental Protection 	<p>Contacted for river mile and water quality data.</p>

In addition, a jurisdictional determination field review of streams and wetlands within the study area was held on July 7, 2010. Representatives from the US Army Corps of Engineers, KYTC and ODOT attended this field review.

Ecological coordination will continue to meet the NEPA interagency coordination requirements, the US Fish and Wildlife Coordination Act requirements, Section 7 of the Endangered Species Act requirements, and to provide pre-application coordination for necessary permits.

Table 7. Agency Coordination for Ecological Resources

Agency	Correspondence Date	Comments
Kentucky Department of Fish and Wildlife Resources (KDFWR)	May 10, 2010	<ul style="list-style-type: none"> • Provided comments regarding the presence of breeding pairs of Peregrine Falcons within the study area. • Concerned that bridge construction may have negative effects on the falcons due to the proximity of the nest locations to the bridge. • The nongame branch of KDFWR can confirm if falcons are nesting on the bridge, prior to construction.
US Fish and Wildlife Service	May 11, 2010	<ul style="list-style-type: none"> • The USFWS concurs with KYTC's may affect but is not likely to adversely affect determination for the running buffalo clover. • KYTC should coordinate with the USFWS regarding the appropriate actions if trees will be cleared in areas of summer bat habitat. • The USFWS recommends that a mussel habitat reconnaissance survey be conducted under the proposed alignment site and under the existing bridge if any in-water work is required for rehabilitation of the structure. • Impacts to Trust Resources resulting from the development of staging, borrow, or waste areas or from the relocation of utilities should be coordinated with the USFWS as these are considered part of the action.
Ohio Environmental Protection Agency (OEPA)	May 20, 2010	<ul style="list-style-type: none"> • OEPA has no substantive issues with the project.
KY Department for Environmental Protection – Division of Water	May 21, 2010	<ul style="list-style-type: none"> • The Division recommends Alternative E as the Preferred Alternative. • Any water or monitoring wells, either drilled or dug in the construction corridor should be properly abandoned by a Kentucky Certified Water Well Driller to prevent the introduction of surface water directly into groundwater during construction. • A Groundwater Protection Plan may be required for construction.
KY Department for Environmental Protection – Division of Enforcement	May 21, 2010	<ul style="list-style-type: none"> • Prior to construction, all applicable permits and registrations must be in place and that KYTC remains in compliance during construction, demolition or repair activities.
Ohio Department of Natural Resources	May 24, 2010	<ul style="list-style-type: none"> • Since 2005, two more records for rare species within the study are have been

Table 7. Agency Coordination for Ecological Resources

Agency	Correspondence Date	Comments
		<p>added. These species are the Channel Darter, threatened in the Ohio River and the Peregrine Falcon, threatened in downtown Cincinnati.</p> <ul style="list-style-type: none"> • The agency recommends no in-water work between March 15 and June 30 to reduce impacts to the Channel Darter and other aquatic species and their habitat. • A detailed mussel survey should be conducted within the area of the new bridge. • The agency believes that the project will not likely impact the Peregrine Falcon.

11.7.3 Section 106 Coordination

Section 106 of 36 CFR Part 800 of the National Historic Preservation Act requires that those parties eligible to participate as consulting parties in the historic preservation review process be identified. The Section 106 process requires the coordination of findings of the Section 106 investigations with the Kentucky Heritage Council (KHC) and the Ohio Historic Preservation Office (OHPO) as well as other defined consulting parties. In 2006 individuals and organizations with interests in the affected communities and historic preservation were invited to participate as consulting parties. Consulting party application forms were also provided at the public meetings held for the project and a consulting party application form is posted on the project website. Table 8 provides a list of local, state, and federal consulting parties for the Brent Spence Bridge Replacement/Rehabilitation Project.

Table 8. Consulting Parties

Consulting Party	Ohio	Kentucky
Local Agencies	Cincinnati Historic Conservation Office Cincinnati Preservation Association Historic Southwest Ohio, Inc. - Hauck House Dayton Street Historic District Association Lower Price Hill Community Council Price Hill Civic Club West End Community Council Cincinnati Metropolitan Housing Authority Community Revitalization Agency Cincinnati Park Board	City of Covington – Mayor City of Covington – Historic Preservation Officer
Local Community Groups	Cincinnati Museum Center	Lewisburg Neighborhood Association Covington Neighborhood Services Coordination Kenton Hills Botany Hills Home Owners Association Botany Hills Neighborhood (West Covington)
State Agencies	Ohio Department of Transportation Ohio Historic Preservation Office	Kentucky Transportation Cabinet Kentucky Heritage Council
Federal Agencies	FHWA, Urban Programs Engineer	FHWA, Kentucky Division
Citizens	Jenny Edwards	None

Section 106 consulting party coordination has included written correspondence as well as meetings and site visits with consulting parties, which resulted in concurrence of a defined Area of Potential Effects (APE), impacts to cultural resources, and potential mitigation measures. The following sections present a summary of Section 106 coordination throughout the PDP.

11.7.3.1 2006 Activities

The first public involvement meetings for the Brent Spence Bridge Replacement/ Rehabilitation Project were held on May 2 and 4, 2006. These public meetings represented Concurrence Point #1 and were held to present work completed in Steps 1 through 4 of the PDP. These meetings were also the first Section 106 public meetings. The meeting advertisement specifically requested that citizens provide information about historic and archaeological resources within the study area. Exhibits showing the locations of documented cultural resources within the study area were displayed at the meetings and posted on the project website. Consulting party application forms were also provided at the public meetings and on the project website.

Meetings with consulting parties in Ohio were held on August 10 and November 16, 2006. Meetings with consulting parties in Kentucky were held on August 30 and November 29, 2006.

11.7.3.2 2007 Activities

Consulting party coordination in 2007 focused on the results of the historic architecture surveys completed in Kentucky and Ohio within the study area. Determination of eligibility recommendations by the Project Team were presented in separate historic architecture survey reports for Kentucky and Ohio properties. These reports were submitted to KHC and OHPO for review and concurrence. There were further discussions/meetings between KYTC, KHC, and ODOT and OHPO regarding the APE, viewshed APE and consulting party coordination.

The *Phase I History/Architecture Survey Report: Hamilton County, Ohio* (June 2007) was circulated to Ohio consulting parties in August 2007. The *History/Architecture Survey Report: Kenton County, Kentucky* (June 2007) was circulated to Kentucky consulting parties in November 2007. Only two consulting parties provided comments on the report.

11.7.3.3 2008 Activities

Phase II historic architecture surveys were conducted for Ohio resources and reports prepared in 2008. There were further discussions/meetings between ODOT and OHPO regarding eligibility determinations and impacts to historic resources held on October 30 and November 6, 2008.

The *History/Architecture Survey Report: Kenton County, Kentucky* was revised in accordance with agency and consulting party comments in November 2008.

11.7.3.4 2009 Activities

The second public involvement meetings for the Brent Spence Bridge Replacement/ Rehabilitation Project were held on May 6 and 7, 2009. These public meetings represented Concurrence Point #2 and were held to present work completed through Step 5 of the PDP. The meeting advertisement and handout specifically requested that citizens provide information about cultural resources within the study area. Exhibits showing the locations of documented cultural resources from the historic architecture surveys within the APE were displayed at the meetings and posted on the project website. Consulting party application forms were also provided at the public meetings and on the project website.

The *Phase II History/Architecture Survey Report: Hamilton County, Ohio* (December 2008) was submitted to OHPO for review and concurrence in January 2009. This report was circulated to consulting parties in June 2009. An *Addendum Phase II History/Architecture Survey Report: Hamilton County, Ohio* (September 2009) was submitted to OHPO for review and concurrence in September 2009. This addendum report was circulated to Ohio consulting parties in October 2009.

KHC provided comments on the revised *History/Architecture Survey Report: Kenton County, Kentucky* (November 2008) in May 2009. The study area in Kentucky was extended south to Dixie Highway Interchange and a historic architecture survey was conducted in this new area in August 2009. The *History/Architecture Survey Report: Kenton County, Kentucky* was revised to include the results of the survey in the extended study area in November 2009.

11.7.3.5 2010 Activities

The study area in Ohio in the vicinity of the Western Hills Viaduct was widened and a historic architecture survey was conducted in this expanded portion of the APE in March 2010. The *Addendum Phase I History/Architecture Survey Report for the Western Hills Viaduct* (July 2010) was submitted to OHPO for review in August 2010. This report was distributed to Ohio consulting parties in September 2010.

ODOT, OHPO, and FHWA met on July 15, 2010 to discuss impacts to Longworth Hall and the Harriet Beecher Stowe School. Information about the impacts to these resources was sent to Ohio consulting parties for comment and posted on the project website. A consulting parties meeting was held on October 7, 2010 to discuss impacts to Longworth Hall and the Harriet Beecher Stowe School and possible mitigation measures.

KYTC, the city of Covington, and FHWA held meetings to discuss impacts to the Lewisburg Historic District on April 1 and June 28, 2010.

The *History/Architecture Survey Report: Kenton County, Kentucky* (April 2010) was reviewed by FHWA and KHC in May and June 2010. KHC concurred with the report findings in July 2010. This report was distributed to consulting parties in September 2010. A Kentucky consulting parties meeting were held on October 15, 2010 to discuss impacts to the Lewisburg Historic District and possible mitigation measures.

11.7.3.6 2011 Activities

The Phase I History/Architecture Survey Addendum Report for the Western Hills Viaduct Interchange (November 2010) was submitted to OHPO for review and concurrence in January 2011. The OHPO concurred with the findings of the report on February 25, 2011. OHPO's concurrence letter was circulated to Ohio consulting parties in March 2011.

11.7.4 Section 4(f) and Section 6(f) Coordination

Section 4(f) coordination with local government officials was initiated in 2008 for Goebel Park in Kentucky and the Queensgate Playground and Ball Fields in Ohio. Section 6(f) coordination was also initiated in 2008 for Goebel Park. Mitigation of impacts to all Section 4(f) and Section 6(f) resources will continue through coordination with officials having jurisdiction over these properties.

The following coordination meetings were held with ODOT, KYTC and representatives of each facility. Details of the meetings are discussed in Section 4.13.3.1.

- September 30, 2008: representatives from KYTC and the city of Covington conducted a field review of Goebel Park and discussed potential impacts.
- November 3, 2008: representatives from the Project Team and the Cincinnati Recreation Commission conducted a field review of the Queensgate Playground and Ball Fields and discussed potential impacts.
- April 1, 2010: KYTC and FHWA met with the city of Covington concerning mitigation opportunities for impacts to Goebel Park and the Lewisburg Historic District.

- June 28, 2010: representatives from the Project Team and ODOT met with the Cincinnati Recreation Commission to discuss impacts of the feasible alternatives to the Queensgate Playground and Ball Fields and potential mitigation.
- June 28, 2010: representatives from the Project Team, KYTC and FHWA met with the city of Covington concerning mitigation opportunities for impacts to Goebel Park and the Lewisburg Historic District.
- July 15, 2010: representatives from the Project Team, ODOT, OHPO, and FHWA met to discuss impacts to Longworth Hall and the Harriet Beecher Stowe School.
- October 5, 2010: representatives from the Project Team and KYTC met with the city of Covington concerning mitigation opportunities for impacts to Goebel Park.
- October 7, 2010: representatives from the Project Team met with Ohio consulting parties to discuss impacts to Longworth Hall and the Harriet Beecher Stowe School and possible mitigation measures.
- October 15 2010: representatives from the Project Team and KYTC met with Kentucky consulting parties to discuss impacts to the Lewisburg Historic District and possible mitigation measures.
- November 22, 2010: representatives from the Project Team and ODOT met with the Cincinnati Recreation Commission to discuss mitigation opportunities for impacts to the Queensgate Playground and Ball Fields.
- December 9, 2010: representatives from the Project Team and KYTC will meet with Kentucky consulting parties to discuss impacts to the Lewisburg Historic District and possible mitigation measures.

11.8 Utility Coordination

Coordination with utility companies was initiated in 2006. The following 13 utility companies have been identified as having facilities in the study area:

- AT&T Fiber Optics,
- Cincinnati Bell (telephone),
- Cincinnati Water Works,
- Duke Energy (gas and electric),
- Insight Communications,
- Level 3 Communications, LLC,
- MCI/Verizon Fiber Optic,
- Metropolitan Sewer District (Greater Cincinnati),
- Northern Kentucky Water District,
- Qwest National Network Services,
- Sanitation District Number 1 (Northern Kentucky),
- Sprint Fiber Optic, and
- Time Warner Cable.

A utility coordination meeting was held on March 16, 2006. The purpose of the meeting was to provide initial project information and to begin coordination between the Project Team and utility companies. The result of the meeting led to the formation of a utility coordination team consisting of utility and Project Team representatives that will continue to coordinate preliminary engineering to ensure that no loss of service occurs during construction or operation. ODOT sent out letters to all utility companies on March 2, 2009 depicting potential utility impacts. In the March 2, 2009 letter, ODOT requested

the utility companies provide back an estimate of the cost to relocate their facilities.

The Project Team has continued coordination with the utility companies since the March 16, 2006 meeting. A summary of the utility coordination conducted for the project is provided in Table 9.

Table 9. Utility Coordination

Date	Description
August 21, 2009	Meeting with Sanitation District Number 1
October 16, 2009	Meeting with Duke Energy
October 26, 2009	Meeting with Duke Gas
November 16, 2009	Meeting with Metropolitan Sewer District
December 9, 2009	Meeting with Duke Energy
March 14, 2010	Meeting with Duke Energy
April 6, 2010	Meeting with Duke Energy
April 12, 2010	Meeting with Sanitation District Number 1
April 14, 2010	Meeting with Duke Energy

11.9 Railroad Coordination

The existing rail lines in the project area include:

- CSX Transportation,
- Norfolk Southern,
- Indiana and Ohio (I&O), and
- Amtrak (passenger rail).

CSX Transportation and Norfolk Southern have classification and intermodal yards in the Queensgate area of Cincinnati. CSX Transportation's Queensgate Yard has the capacity for 4,000 rail cars, and is one of the busiest freight rail yards in the Midwest.

CSX Transportation and Norfolk Southern have lines that parallel I-75. Two other railroads, Amtrak and the Indiana and Ohio Railway have "trackage rights" over these rail lines. More than 90 trains per day use the tracks in this corridor. Even though the two major railroads are competitors, they have a special operating agreement that allows each railroad to use the other's tracks due the rail congestion issues in this corridor.

Initial coordination with railroad companies provided the following clearance information:

- The required minimum overhead clearance is 23 feet, and
- The required minimum lateral clearance (from centerline of track) is 25 feet, less would require crash walls.

No additional railroad coordination has been conducted throughout the project development process because the railroads will not be impacted by the project.

12.0 SUMMARY OF SECTION 106 CONSULTATION

12.1 History/Architecture Investigations

The Phase I and II History/Architecture investigations for this project were conducted June 2007 to July 2010. These Investigations included Phase I and II reports for the Ohio side of the project and a History/Architecture Survey report for the Kentucky side. The Phase I Ohio History Architecture report identified 11 extant, previously recorded Ohio Historic Inventory (OHI) resources in the project Area of Potential Effects (APE), three of these resources also were listed in the National Register of Historic Places (NRHP). In addition, two NRHP Historic Districts were located within the project APE. A total of 16 previously unrecorded architectural resources were documented during the fieldwork. Of these resources, only one property at 724 Mehring Way was recommended eligible for inclusion in the NRHP.

The Phase I Ohio survey recommended two history/architecture resources for Phase II investigations: the Harriet Beecher Stowe Elementary School (Resource HAM-1342-43) and the previously unrecorded Hudepohl Brewery Building at 801 West 6th Street. Phase II investigations determined that the Harriet Beecher Stowe Elementary School (Resource HAM-1342-43) was recommended eligible for inclusion in the NRHP under Criterion B and that the previously unrecorded Hudepohl Brewery Building at 801 West Sixth Street was recommended not eligible for inclusion in the NRHP. The Ohio Historic Preservation Office (OHPO) and the Ohio Department of Transportation (ODOT) concurred with this recommendation in January 2009, but recommended additional research under Phase II investigations for the West Virginia Coal & Coke Company Office/scale house located at 725 West Mehring Way. Phase II investigations were completed in August 2008 to January 2009. Phase II investigations recommended the West Virginia Coal & Coke Company Office/scale house not eligible for inclusion in the NRHP; OHPO concurred with this determination in October 2009 (See Appendix C).

Kentucky History/Architecture investigations for this project were conducted July 2006 to April 2010; these investigations identified 129 architectural resources during field survey. All previously recorded resources, NRHP-listed properties, and 105 previously unrecorded historic resources were documented in the *Brent Spence Brent Replacement/Rehabilitation Project History/Architecture Report Kenton County, Kentucky*. In addition, 15 architectural resources were recommended eligible for inclusion in the NRHP. The Kentucky Heritage Council (KHC) and the Kentucky Transportation Cabinet (KYTC) concurred with these findings in July 2010 (See Appendix C).

In March 2010 to July 2010 Phase I Ohio History/Architecture investigations were conducted for the proposed design improvements to the Western Hills Viaduct Interchange. The Western Hills Viaduct improvements are considered part of the larger Brent Spence Bridge Replacement/Rehabilitation Project. A Phase I History/Architecture Survey of the Western Hills Viaduct area was completed in 2007 as part of the Phase I Ohio History/Architecture survey; however, the study area around the Western Hills Viaduct interchange changed in early 2010 to accommodate redesign of the interchange. This created the need for the specific Western Hills Viaduct Phase I History/Architecture Survey. This Phase I addendum report was completed as a revision of the Brent Spence Bridge project's APE and addressed only the Western Hills Viaduct area.

Five previously recorded OHI resources were identified within the APE addendum, and no NRHP resources were identified. Additionally, 21 properties were identified in the City of Cincinnati Historic Inventory's proposed West McMicken Avenue Historic District. Fifty-three previously unrecorded historic resources were identified within the APE. This report currently is under review by the OHPO.

12.2 Historic Resources Consultation

As part of the Section 106 of the National Historic Preservation Act of 1966, consultation of interested organizations and individuals is required. Table 9 provides the lists of consulting parties in Ohio and Kentucky. Letters sent to the consulting parties are located in Appendix D.

Section 106 Coordination for historic properties was initiated in 2006. This included written correspondence as well as meetings and site visits with consulting parties and a State Historical Preservation Office (SHPO) agency official, which resulted in concurrence of a defined APE and potential impacts on cultural resources. Meetings with consulting parties in Kentucky were held on August 30 and November 29, 2006. Meetings with consulting parties in Ohio were held on August 10 and November 16, 2006.

Meetings with the KHC and the OHPO were held to discuss eligibility determinations of historic resources within the study area and potential impacts to these resources. A meeting was held on October 30, 2007 with KHC and meetings were held on October 30, 2008 and July 15, 2010 with OHPO.

Six Phase I and Phase II history/architecture survey reports were circulated to the consulting parties for review and comment. These documents included the History/Architecture Survey Report: Kenton County, Kentucky (June 2007 and April 2010); Phase I History/Architecture Survey Report: Hamilton County, Ohio (June 2007); Phase II History/Architecture Investigations: Hamilton County, Ohio (October 2008); Phase II History/Architecture Investigations: Hamilton County, Ohio (September 2009); and Phase I History/Architecture Survey Addendum Report for the Western Hills Viaduct Interchange: Hamilton County, Ohio (June 2010). The reports were coordinated with their respective consulting parties in Kentucky and Ohio in 2007, 2009, and 2010.

Table 10. Consulting Parties

Consulting Party	Ohio	Kentucky
Local Agencies	Cincinnati Historic Conservation Office Cincinnati Preservation Association Historic Southwest Ohio, Inc. - Hauch House Dayton Street Historic District Association Lower Price Hill Community Council Price Hill Civic Club West End Community Council Cincinnati Metropolitan Housing Authority Community Revitalization Agency Cincinnati Park Board	Kenton County Fiscal Court - Judge Executive City of Covington – Mayor City of Covington – Historic Preservation
Local Community Groups	Cincinnati Museum Center	Lewisburg Neighborhood Association Covington Neighborhood Services Coordination Kenton Hills West Covington/Botany Hills Botany Hills Neighborhood (West Covington) Westside (Westside Action Coalition) Mainstrasse Village Association
State Agencies	Ohio Historic Preservation Office	Kentucky Heritage Council
Federal Agencies	FHWA, Urban Programs Engineer	FHWA, Kentucky Division

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14.0 ACRONYMS, ABBREVIATIONS, AND DEFINITIONS

Adverse Effect	The effect of a Federal undertaking that may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.
Area of Potential Effect (APE)	The geographic area within which a Federal undertaking may directly or indirectly alter the character or use of historic properties.
Association	Aspect of integrity. Association is the direct link between an important historic event or person and a historic property.
Code of Federal Regulations (CFR)	The codification of administrative laws as published in the <i>Federal Register</i> by the executive departments and agencies of the Federal government.
Criteria of Adverse Effect	The standard by which a historic property is evaluated within the context of a proposed Federal undertaking to determine if that undertaking would result in an adverse effect to the historic property.
Design	Aspect of integrity. Design is the combination of elements that create the form, plan, space, structure, and style of a property.
Feeling	Aspect of integrity. Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.
Historic District	A group of historically related buildings, structures, and/or objects that are listed in the National Register of Historic Places as a unit.
Historic Property	A property or group of properties that have been listed in or have been determined eligible for inclusion in the National Register of Historic Places. For the purpose of this report, a historic property may be a building, a group of buildings, a historic district, a structure, or a group of objects.
Indirect Effect	Impacts caused by direct effects (direct impacts) but that occur later in time and are farther in distance.
Integrity	The ability of a property to convey its historic significance. The aspects of integrity include location, design, setting, materials, workmanship, feeling, and association.

Location	Aspect of integrity. Location is the place where the historic property was constructed or the place where the historic event occurred.
Materials	Aspect of integrity. Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
National Register Criteria for Evaluation	Criteria that define the scope of the National Register of Historic Places. They identify the range of resources and kinds of significance that will qualify properties for listing in the National Register. The criteria are written broadly to recognize the wide variety of historic properties associated with our prehistory and history.
National Register of Historic Places (NRHP)	The Federal government's list of historic places deemed worthy of preservation. The list is maintained by the National Park Service and contains districts, sites, buildings, structures, and objects determined to be of historic, cultural, architectural, archeological, or engineering significance at the national, state, or local level.
No Adverse Effect	The finding that the project would alter a specific aspect of integrity for an individual historic property but the effect would not alter a characteristic that qualifies that property for inclusion in the NRHP in a manner that diminishes the significant aspect of integrity. Also the summary finding when a finding of "No Adverse Effect" is determined for any aspect of integrity for an individual historic property, but no effects are determined to be adverse.
No Effect	The finding that the proposed project would not alter a specific aspect of integrity for an individual historic property. Also the summary finding when no aspect of integrity for an individual historic property is altered.
NRHP Boundary	The boundary within which a historic property is located.
Resource	See Historic Property.
Section 106	Section 106 of the National Historic Preservation Act of 1966 (as amended) requires any Federal agency having direct or indirect jurisdiction over a Federal or federally assisted undertaking to consider the effect of that undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the NRHP. Regulations and guidelines for ensuring compliance with Section 106 are set forth in 36 CFR 800, "Section 106 Regulations, Protection of Historic Properties".
Setting	Aspect of integrity. Setting is the physical environment of a historic property.

State Historic Preservation Officer (SHPO)	The SHPO advises and assists Federal agencies in carrying out Section 106 responsibilities and cooperates with such agencies, local governments, and organizations and individuals to ensure that historic properties are considered at all levels of planning and development.
Viewshed	The view from a historic property or a portion of a historic property to its surroundings.
Workmanship	Aspect of integrity. Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

APPENDIX A:
Photographs of Affected Properties



Plate A1. View of B&O Railroad Freight Terminal/Longworth Hall, facing east.



Plate A2. View of KY-49, 610 West 12th Street, facing northwest.



Plate A3. View of KY-50, 608 West 12th Street, facing northwest.



Plate A4. View of KY-51, 606 West 12th Street, facing northwest.



Plate A5. View of KY-52, 604 West 12th Street, facing northwest.



Plate A6. View of KY-53, 605 West 11th Street, facing southeast.



Plate A7. View of KY-54, 609 West 11th Street, facing southwest.



Plate A8. View of KY-55, 606 West 11th Street, facing northwest.



Plate A9. View of KY-56, 608 West 11th Street, facing northwest.



Plate A10. View of KY-57, 610 West 11th Street, facing northwest.



Plate A11. View of KY-67, 622 Lewis Street, facing northwest.



Plate A12. View of KY-68, 624 Lewis Street, facing northwest.



Plate A13. View of KY-69, 626 Lewis Street, facing northwest.



Plate A14. View of KY-70, 628 Lewis Street, facing northwest.



Plate A15. View of KY-71, 630 Lewis Street, facing northwest.



Plate A16. View of KY-73, 636-640 Lewis Street, facing west.



Plate A17. View of KY-76, 623/643 Laurel Street, facing southwest.



Plate A18. View of KY-78, 639 West 9th Street, facing southwest.



Plate A19. View of KY-79, 641-645 West 9th Street, facing southeast.



Plate A20. View of KY-96, 872 Crescent Avenue, facing northeast.



Plate A21. View of KY-115, 824 Crescent Avenue, facing northeast.



Plate A22. View of KY-116, 822 Crescent Avenue, facing northeast.



Plate A23. View of KY-117, 820 Crescent Avenue, facing northeast.



Plate A24. View of KY-118, 818 Crescent Avenue, facing northeast.



Plate A25. View of KY-119, 816 Crescent Avenue, facing northeast.



Plate A26. View of KY-120, 812 Crescent Avenue, facing northeast.



Plate A27. View of KY-122, 808 Crescent Avenue, facing northeast.



Plate A28. View of KY-123, 806 Crescent Avenue, facing east.



Plate A29. View of KY-124, 804 Crescent Avenue, facing northeast.



Plate A30. View of 533-535 Pike Street, facing southwest.



Plate A31. View of 511-519 Pike Street, facing southeast.

APPENDIX B:
Photo-Simulations of the Final 3 Bridge Alternatives



ALTERNATIVE 1 – TIED ARCH



ALTERNATIVE 1 – TIED ARCH



ALTERNATIVE 1 – TIED ARCH



ALTERNATIVE 3 – TWO TOWER CABLE STAYED



ALTERNATIVE 3 – TWO TOWER CABLE STAYED



ALTERNATIVE 3 – TWO TOWER CABLE STAYED



ALTERNATIVE 6 – ONE TOWER CABLE STAYED



ALTERNATIVE 6 – ONE TOWER CABLE STAYED



ALTERNATIVE 6 – ONE TOWER CABLE STAYED

APPENDIX C:

**Letters of Concurrence from the Ohio Historic
Preservation Office and the Kentucky Heritage Council**



**OHIO DEPARTMENT OF TRANSPORTATION
INTER-OFFICE COMMUNICATION
Office of Environmental Services**

TO: Hans Jindal, District 8 Deputy Director **DATE:** August 10, 2007
Attention: Keith Smith, District Environmental Coordinator

FROM: *Suzanne Casbarro for*
Timothy M. Hill, Administrator, Office of Environmental Services

SUBJECT: Cultural Resource Coordination: Revised Phase I History/Architecture Report

PROJECT: HAM-75-0.00- Brent Spence Bridge PID: 75119

Enclosed is a copy of the Ohio State Historic Preservation Office (OSHPO) letter dated August 3, 2007. The OSHPO concurred with the findings in the submitted report, with two exceptions. As stated in the attached letter, the OSHPO would like to consider the views of the Consulting Parties on the eligibility of two properties; the West Virginia Coal and Coke Company, at 725 Front Street and the Panhandle Railroad Freight Depot, 603 Pete Rose Way.

If you have any questions or comments, please contact Monica Kuhn, Office of Environmental Services, at 614-466-6981.

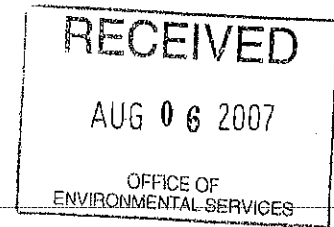
TMH:mlk

c: Keith Smith, District 8 - File – Reading File; **Major New Project coordinator**

att: August 3, 2007 letter from OHPO



August 3, 2007



Timothy M. Hill, Administrator
Office of Environmental Services
Ohio Department of Transportation
Central Office
1980 West Broad St.
Columbus, OH 43223

Subject: HAM-75-0.00, Brent Spence Bridge, PID 75119

Re: Revised History/Architecture Phase 1 Report

Dear Mr. Hill:

This is in response to your correspondence, dated June 28, 2007, regarding the proposed replacement or rehabilitation of the Brent Spence Bridge over the Ohio River and the report titled *Phase I History/Architecture Survey, Hamilton County, Ohio, ODOT PID No. 75119, HAM-71/75-0.00/0.22, KYTC Project Item No. 6-17, June 2007*. My comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

In response to the eligibility recommendations in your letter, I concur with your findings for the first six numbered items.

1. Cincinnati Union Terminal is a National Historic Landmark.
2. These buildings are listed in the National Register:
 - The Cincinnati Job Corps Center/Our Lady of Mercy High
 - The B & O Freight and Storage Building/Longworth Hall, including the Scale House pictured in plates B14-B15
 - The Ohio National Guard Armory, although listed, has been demolished
3. Portions of the Dayton Street Historic District are in the Area of Potential Effects (APE) for this project.
4. Portions of the West Fourth Street Historic District are in the APE for this project.

OHIO HISTORICAL SOCIETY

Ohio Historic Preservation Office

567 East Hudson Street, Columbus, Ohio 43211-1030 ph: 614.298.2000 fx: 614.298.2037

www.ohiohistory.org

5. The Chem-Pack Building, 2261 Spring Grove Avenue, HAM-1709-40, is eligible under Criterion C, and the recommended boundary is appropriate.
6. I concur with your recommendations that a Phase 2 study should be conducted to determine the eligibility of:
 - The Harriet Beecher Stowe Elementary School/Stowe Adult Education Center/Channel WXIX (HAM-1342-43), located at 635 West 7th Street
 - The Hudepohl Brewery Building, 801 West Sixth Street
- 6a. You state in your letter that the John Mueller House, 724 Mehring Way, is eligible under Criterion C, and I concur with this finding. Further research in the form of a Phase 2 study to determine if it is also eligible under Criterion B is not necessary at this point.
7. In your seventh item, a list of twenty properties that you find not eligible for the National Register of Historic Places, I concur with most, but not all, of your findings. I agree that these buildings are not eligible:
 1. Police Patrol Station #4, 748 W. Fourth St., HAM-2029-43
 2. West End Electric Generating Station, Front & Rose Sts., HAM-5508-43
 3. The Hennegan Company, 444 West Third St., HAM-5571-43
 4. 220 West Third St., HAM-80-44
 5. 218 West Third St., HAM-5540-44
 6. Business Information Storage Building, 318 W. Third St., HAM-5572-44
 7. 824 Mehring Way
 8. **See next paragraph**
 9. 690 West Third St
 10. 605 West Third St
 11. The Federal Equipment Building, 726 Mehring Way
 12. CG&E Building, 646 Mehring Way
 13. **See next paragraph**
 14. The Young & Bertke Company Building, 2108 Winchell
 15. 1101 Alfred St.
 16. 1130 and 1132 Draper St.
 17. 1100 Gest St.
 18. Butternut Bakery Complex, 748 West Fifth St.
 19. Queensgate Correctional Facility, 516-528 Linn St.
 20. 302 West Sixth St. Did you mean 302 West Third St.? If so, I concur.

I would like to postpone a decision on the eligibility of the eighth and thirteenth items in your seventh list, specifically on the Coal Company office and the Panhandle Railroad freight depot until we have heard or read the comments of

Timothy M. Hill
August 3, 2007
Page 3

the Consulting Parties. Perhaps the Consulting Parties have information or opinions on the historic or research value of these buildings.

8. West Virginia Coal & Coke Company, 725 Front St.

The facts, stated in the revised Phase I report, that a West Virginia mining company had a railroad, a regional distribution network, and a field office in Cincinnati suggests that this may be an important piece of Cincinnati history.


13. Panhandle Railroad Freight Depot, 603 Pete Rose Way

While this freight depot has lost some aspects of integrity, it may still be a source of information about how railroad buildings were built in the late nineteenth century. Construction details that could be noted now might be useful for determining the construction dates of other railroad buildings.

As the information in the Phase 1 report is presented to the consulting parties, we may discover that additional information changes some of the evaluations that have been made in the report, in ODOT's findings, or in the OHPO review of those findings.

If you have any questions concerning this letter, please contact me at 298-2000. Thank you for your cooperation.

Sincerely,

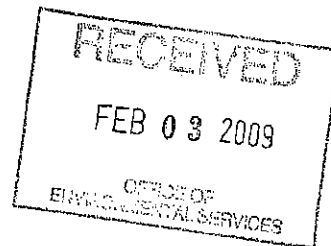


Nancy H. Campbell
History/Architecture Transportation Reviews Manager
Ohio Historic Preservation Office



OHIO DEPARTMENT OF TRANSPORTATION
Division of Planning, Office of Environmental Services
1980 West Broad Street, Columbus, Ohio 43223

REC'D BY CHFO JAN 26 2009



January 21, 2009

Mr. Mark Epstein, Department Head
Resource Protection and Review
Ohio Historic Preservation Office
567 East Hudson Street
Columbus, Ohio 43211

Attn: Nancy Campbell, ODOT Review Manager, History/Architecture
Thomas Grooms, ODOT Review Manager, Archaeology

Subject: HAM-71/75-0.00/0.22, PID 75119

Re: *History/Architecture Coordination, Brent Spence Bridge Rehabilitation Project December 2008*

Dear Mr. Epstein:

In this letter we seek your concurrence on properties we believe are eligible for the National Register of Historic Places (NRHP) which are located within the area of potential effects (APE) of the subject undertaking. The proposed project is intended to improve the operational characteristics within a 6.5 mile segment of I-75 within the Commonwealth of Kentucky (straight line mile 188.0) and the State of Ohio (straight line mile 2.7).

Phase II Report

Enclosed for your review is a paper copy of the Phase II History/Architecture Investigations (Gray & Pape Inc., December 2008). It addresses the Hudepohl Brewery Building and the Harriet Beecher Stowe Elementary School (OHI #HAM-1342-43) only.

As a result of the Phase I History/Architecture Survey, ongoing project development and consultation with the Ohio Historic Preservation Office (OHPO) and consulting parties, ODOT determined that Phase II history/architecture investigations were needed for two properties:

- The Harriet Beecher Stowe Elementary School (also known as Stowe Adult Education Center, and currently Channel WXIX, 635 West 7th Street (HAM-1342-43). It may be eligible for the National Register under Criterion B for its association with Dr. Jennie D. Porter, who was the first African-American woman to earn a Ph.D. at the University of Cincinnati. Phase II research was conducted to assess the significance of this association and to confirm that the school retains integrity.
- The Hudepohl Brewery Building, 801 West Sixth Street (also known as 505 Gest Street). Phase II research was conducted to assess its significance of this complex under Criterion A, as a 19th Century Cincinnati brewery, and to assess its integrity and boundaries.

Additionally, OHPO, in their August 3, 2007 letter, recommended additional consideration of the Panhandle Railroad Freight Depot, located at 603 Pete Rose Way and the West Virginia Coke and Coal building located at 725 Front Street, due to consulting party concerns, field review of the property took place on November 6, 2008. In the field, ODOT and OHPO staff agreed that the Panhandle Railroad Freight Depot has lost integrity due to alterations, and is not eligible for the NRHP. The West Virginia Coke and Coal company building needs Phase II research completed to determine eligibility for the NRHP based on Criterion A.

ODOT's NRHP Eligibility Recommendations

Based on the results of the Revised Phase II investigation, site visits, consultation with consulting parties, historic boundary recommendations and the NR Criteria, and in accordance with 36 CFR Part 800, ODOT is requesting concurrence with the following findings:

- The Harriet Beecher Stowe Elementary School, 635 West 7th Street (HAM-1342-43) is eligible for the NRHP under Criterion B for its association with Dr. Jennie D. Porter. The boundaries for the historic property consist of the footprint of the existing building.
- The Hudepohl Brewery Building complex, 801 West Sixth Street (also known as 505 Gest Street) is not eligible for the NRHP, largely due to its loss of integrity as a result of the demolition of portions of the complex.
- The Panhandle Railroad Freight Depot, located at 603 Pete Rose Way, is not eligible for the NRHP. Although it may have been significant under Criterion A, for its association with railroad industry in Cincinnati, it has lost integrity due to insensitive alterations.
- The West Virginia Coal and Coke Building, located at 725 Front Street, is recommended for Phase II research to determine its eligibility under Criterion A.

Conclusion

On behalf of the FHWA, and in accordance with 36 CFR Part 800.4(c), we request your response to the enclosed within 30 days after your receipt of this letter. If no objection is received within 30 days, in accordance with the Advisory Council On Historic Preservation's current regulations under 36 CFR Section 800.3(c)(4), FHWA and ODOT will proceed to the next step in the process based on these findings.

Respectfully,



Timothy M. Hill
Administrator
Office of Environmental Services

OHIO STATE HISTORIC PRESERVATION OFFICE CONCURRENCE:

Nancy H. Campbell

February 2, 2009
(Date)

TMH:mlk
Enclosure

- c: M. VonderEmbse, FHWA
Stefan Spinosa, D-8, ODOT
Keith Smith, District 8, DEC, ODOT
Noel Alcalá, Major New, OES, ODOT
Project File, w/att.
Reading File



OHIO DEPARTMENT OF TRANSPORTATION

CENTRAL OFFICE • 1980 WEST BROAD STREET • COLUMBUS, OH 43223

TED STRICKLAND, GOVERNOR • JOLENE M. MOLITORIS, DIRECTOR

September 29, 2009

Mr. Mark Epstein, Department Head
Resource Protection and Review
Ohio Historic Preservation Office
567 East Hudson Street
Columbus, Ohio 43211



Attn: Nancy Campbell, ODOT Review Manager, History/Architecture
Thomas Grooms, ODOT Review Manager, Archaeology

Subject: HAM-71/75-0.00/0.22, PID 75119

Re: *History/Architecture Coordination, Brent Spence Bridge Rehabilitation Project, Phase II addendum*

Dear Mr. Epstein:

In this letter we seek your concurrence on the eligibility of a property for the National Register of Historic Places (NRHP) which is located within the area of potential effects (APE) of the subject undertaking. The proposed project is intended to improve the operational characteristics within a 6.5 mile segment of I-75 within the Commonwealth of Kentucky (straight line mile 188.0) and the State of Ohio (straight line mile 2.7).

Phase II Report

Enclosed for your review is a paper copy of the Phase II History/Architecture Investigations (Gray & Pape Inc., September 2009). It addresses the West Virginia Coal and Coke Company building only.

As a result of the Phase I History/Architecture Survey, ongoing project development and consultation with the Ohio Historic Preservation Office (OHPO) and consulting parties, ODOT determined that Phase II history/architecture investigations were needed for two properties:

- The Harriet Beecher Stowe Elementary School (also known as Stowe Adult Education Center, and currently Channel WXIX, 635 West 7th Street (HAM-1342-43).
- The Hudepohl Brewery Building, 801 West Sixth Street (also known as 505 Gest Street).

Additionally, OHPO, in their August 3, 2007 letter, recommended additional consideration of the Panhandle Railroad Freight Depot, located at 603 Pete Rose Way and the West Virginia Coke and Coal building located at 725 Front Street, due to consulting party concerns, field review of the property took place on November 6, 2008. In the field, ODOT and OHPO staff agreed that the Panhandle Railroad Freight Depot has lost integrity due to alterations, and is not eligible for the NRHP. It was

also determined that the West Virginia Coke and Coal company building needs Phase II research completed to determine eligibility for the NRHP based on Criterion A.

ODOT's NRHP Eligibility Recommendations

Based on the results of the Revised Phase II investigation, site visits, consultation with consulting parties, historic boundary recommendations and the NR Criteria, and in accordance with 36 CFR Part 800, ODOT is requesting concurrence with the following findings:

- The West Virginia Coal and Coke Building, located at 725 Front Street, is not eligible for listing in the NRHP. It is not eligible because it is not associated with events that have made a significant contribution to the broad patterns of our history. It is also not associated with the lives of persons significant in our past, and is not significant for its architectural design.

Conclusion

On behalf of the FHWA, and in accordance with 36 CFR Part 800.4(c), we request your response to the enclosed within 30 days after your receipt of this letter. If no objection is received within 30 days, in accordance with the Advisory Council On Historic Preservation's current regulations under 36 CFR Section 800.3(c)(4), FHWA and ODOT will proceed to the next step in the process based on these findings.

Respectfully,


Timothy M. Hill
Administrator
Office of Environmental Services

OHIO STATE HISTORIC PRESERVATION OFFICE CONCURRENCE:

Nancy H. Campbell October 5, 2009

(Date)

TMH:mlb
Enclosure

- c: M. VonderEmbse, FHWA
Stefan Spinosa, D-8, ODOT
Keith Smith, District 8, DEC, ODOT
Larry Hoffman, Major New, OES, ODOT
Project File, w/att.
Reading File



OHIO DEPARTMENT OF TRANSPORTATION

CENTRAL OFFICE • 1980 WEST BROAD STREET • COLUMBUS, OH 43223
JOHN R. KASICH, GOVERNOR • JERRY WRAY, DIRECTOR

OFFICE OF ENVIRONMENTAL SERVICES

January 27, 2011

Mr. Mark Epstein, Department Head
Resource Protection and Review
Ohio Historic Preservation Office
567 East Hudson Street
Columbus, Ohio 43211



Attn: ODOT Transportation Review Managers

Subject: HAM-71/75-0.00/0.22 (PID 75119)

Re: *Phase I History/Architecture Survey Addendum Report for the western Hills Viaduct Interchange (Hamilton County, Ohio), PID: 75119*

Dear Mr. Epstein:

Enclosed is one copy of the *Phase I History/Architecture Survey Addendum Report for the western Hills Viaduct Interchange (Hamilton County, Ohio), PID: 75119*, dated November 2010. Based on the results of the enclosed survey and Section 106 consultation conducted to date, ODOT/FHWA has determined the following properties, located within the area of potential effects (APE) of the addendum area, are eligible for inclusion on the National Register of Historic Places (NRHP):

Rummane Building (HAM-1462-06) 635 Kress Alley

The building is recommended eligible for listing in the NRHP and the appropriate historic boundaries would include the legal parcel boundary of the property.

650 West McMicken Avenue (HAM-0484-06)

The building is recommended eligible for listing in the NRHP and the appropriate historic boundaries would include the legal parcel boundary.

Western Hills Viaduct (SFN 3105458)

The Western Hills Viaduct (SFN 310548) is eligible for listing in the NRHP. The appropriate historic boundaries, as described by the enclosed report, encompass: the footprint of the bridge, including its piers, super and sub-structures, and roadway from Central Parkway on the east to just east of Beekman Street on the west.

Brighton Bridge (SFN 3101533)

The Brighton Bridge (SFN 3101533) is eligible for listing in the NRHP. The appropriate historic boundaries, as described by the enclosed report, encompass the footprint of the bridge from the retaining wall on the east side of Central Parkway to the bridge approach beginning near the intersection of Colerain Avenue and Harrison Avenue on the southwest.

West McMicken Avenue Historic District

The West McMicken Avenue Historic District, as proposed by Cincinnati Preservation, is eligible for the NRHP. The appropriate historic boundaries, as described by the enclosed report, encompass:

Recommended boundaries begin at the western curb line of West McMicken Avenue south of the Warner Street steps and proceed east to the rear of the parcel boundary of 2364 West McMicken Avenue. The boundary proceeds south following the rear line of the parcels fronting West McMicken Avenue to a point at the southeast corner of the parcel boundary of 2342 West McMicken Avenue. The boundary then continues west to the western curb line of West McMicken Avenue and turns south along the road to a point on the southern parcel boundary of 2321 West McMicken Avenue. Turning west, the boundary proceeds to the eastern curb line of Central Parkway, where it turns north, follow West McMillan Street to the northern parcel boundary of 2411 West McMicken Avenue. The boundary then turns east along said parcel to the western curb line of West McMicken Avenue, thence continuing south to the point of beginning. The proposed district includes one non-contributing building located at 2351 West McMicken Avenue and one non-contributing structure, a billboard, at 2329 West McMicken Avenue.

Central Trust – Brighton Office (HAM-2164-28 revised to HAM-6332-40), 1110 Harrison Avenue

The Central Trust – Brighton Office (HAM-6332-40) is eligible for listing in the NRHP. The appropriate NRHP boundaries include the legal parcel boundary of the property.

High-Craft Printing (HAM-7366-28), 1120 Harrison Avenue

The High-Craft Printing building (HAM-7366-28), historically known as the "Post Office Station B", is eligible for listing in the NRHP. The appropriate NRHP boundaries include footprint of the building itself.

Western Hills Viaduct Subway Portal

The Western Hills Viaduct Subway Portals are eligible for inclusion on the NRHP. The appropriate historic boundaries encompass the portal openings as described by the enclosed report. In regard to the Phase I addendum report, although, a Phase II is recommended to investigate the location of the extant remnants of the Cincinnati Subway Tunnels, ODOT/FHWA has committed to the following: Additional documentation and consultation will be conducted if it is determined the preferred alternative has the potential to effect the Western Hills Viaduct Subway Portals, eligible for listing on the NRHP, or any of the contributing features of the portal, including the tunnel itself.

proceeds
nkc
2-25-11

Section 106 Determinations of Eligibility

Pursuant to 36 CFR § 800.4 and in accordance with the Advisory Council on Historic Preservation's (ACHP) current regulations, FHWA, with ODOT as their agent, request concurrence the following resources are eligible for listing on the NRHP:

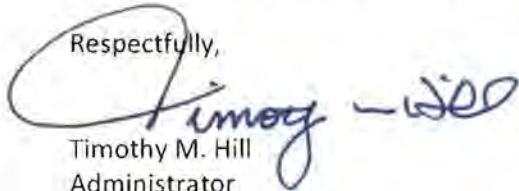
- 635 Kress Alley (Rummane Building/HAM-1462-06)
- 650 West McMicken Avenue (HAM-0484-06)
- Western Hills Viaduct (SFN 3105458)
- Brighton Bridge (SFN 3101533)
- West McMicken Avenue Historic District
- 1110 Harrison Avenue, Central Trust – Brighton Office (HAM-2164-28 revised to HAM-6332-40)
- 1120 Harrison Avenue, High-Craft Printing (HAM-7366-28)
- Western Hills Viaduct Subway Portal

Pursuant to 36 CFR § 800.4 and in accordance with the Advisory Council on Historic Preservation's (ACHP) current regulations, FHWA, with ODOT as their agent, request concurrence the following:

- Additional investigations and consultation will be conducted; if it is determined the preferred alternative has the potential to effect the Western Hills Viaduct Subway Portals, eligible for listing on the NRHP, or any of the contributing features of the portal, including the tunnel itself.
- Additional consultation will be forthcoming to determine the effect of the undertaking to properties listed on or eligible for listing on the NRHP and to resolve adverse effects in accordance with 36 CFR § 800.6.

Pursuant to 36 CFR § 800.4 and in accordance with the Advisory Council on Historic Preservation's (ACHP) current regulations, FHWA, with ODOT as their agent, request concurrence with these findings. We would appreciate the return of this letter, signed to indicate that you do not object to the finding. If no response is received within 30 days, in accordance with the ACHP current regulations, it will be presumed that the OSHPO agrees with the determinations made in the above coordination. Comments may be addressed to Susan Gasbarro, Office of Environmental Services, at susan.gasbarro@dot.state.oh.us.

Respectfully,



Timothy M. Hill
Administrator
Office of Environmental Services

OHIO STATE HISTORIC PRESERVATION OFFICE CONCURRENCE:

Nancy H. Campbell

February 25, 2011

(Date)

Mr. Epstein
HAM-71/75-0.00/0.22, PID 75119

-4-

January 27, 2011

TMH:sg
Enclosure

c: ODOT-District 8
FHWA, w/attachment
Section 106 Consulting Parties, w/attachment
Project file



MAY 7 AM 8:43

**COMMERCE CABINET
KENTUCKY HERITAGE COUNCIL**

Ernie Fletcher
Governor

The State Historic Preservation Office
300 Washington Street
Frankfort, Kentucky 40601
Phone (502) 564-7005
Fax (502) 564-5820
www.kentucky.gov

George Ward
Secretary

May 2, 2007

Mr. Anthony Goodman
Federal Highway Administration
330 West Broadway
Frankfort, KY 40601

**Re: Area of Potential Effect for I-71/I-75 Brent Spence Bridge Project, Kenton County, Kentucky
(Item No. 6-17.00)**


Dear Mr. Goodman:

The State Historic Preservation Office received for review and approval the above referenced Area of Potential Effect (APE). According to KYTC-DEA and the Gray & Pape, the areas east of the proposed project corridor, including the Roebling Bridge, will have a limited or obstructed views of this undertaking, and FHWA has determined that the viewshed to the east should be eliminated from the APE. We agree that the eastern APE boundary appears appropriate as drawn on the map provided to this office.

Until the project alternates are determined and a more definitive APE can be drawn, it is our opinion that the APE appears suitable at this time. We appreciate KYTC-DEA's statement that modifications to the APE may well be made during project development to ensure that all project impacts are assessed and evaluated. Should a more westerly alternative be selected, then we expect that every historic resource 50 years or older within an expanded APE will be evaluated as part of this project.

If you have any questions, please do not hesitate to call Janie-Rice Brother of my staff at 502-564-7005, extension 121.

Sincerely,


Donna M. Neary, Executive Director
Kentucky Heritage Council and
State Historic Preservation Officer

Cc: David Waldner, Rebecca Turner (KYTC-DEA)



FILE COPY

COMMERCE CABINET
KENTUCKY HERITAGE COUNCIL

Ernie Fletcher
Governor

The State Historic Preservation Office
300 Washington Street
Frankfort, Kentucky 40601
Phone (502) 564-7005
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September 10, 2007

George Ward
Secretary

Donna M. Neary
Executive Director and
State Historic Preservation Officer

Ms. Bernadette Dupont
Planning and Environmental Engineer
Federal Highway Administration
330 West Broadway
Frankfort, KY 40601

Re: Phase 1 History/Architecture Survey for the Brent Spence Bridge Replacement Project, Kenton County, Kentucky (Item No. 6-17.00)

Dear Ms. Dupont:

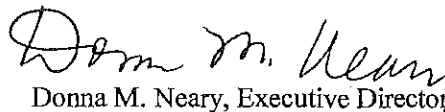
The State Historic Preservation Office has received for review and approval the above referenced report. Our review indicates that it does not meet the Kentucky Heritage Council's *Specifications for Conducting Fieldwork and Preparing Cultural Resource Assessment Reports*. As such, it is not possible for this office to make an independent evaluation of the National Register eligibility of the 54 resources documented during the course of this study.

In order for the Kentucky Heritage Council to complete its review the report needs to be revised to include the following:

- The report needs to contain a detailed description of each resource 50 years or older, which should be mapped and illustrated with at least one color photograph. The treatment of 54 resources within Appendix A, in the format of a table, is not conducive to an expedient or independent review. (*Specifications*, Chapter VI, H.2.a.1-2)
- Documentation for each site 50 years or older shall include a KHC inventory form with color or black and white photographs and negatives. Site inventory forms were not completed for this report. (*Specifications*, Chapter V, B.2.a-b)

We look forward to reviewing a revised report once these issues are addressed. Should you have any questions, feel free to contact Janie-Rice Brother of my staff at (502) 564-7005 extension 121.

Sincerely,


Donna M. Neary, Executive Director
Kentucky Heritage Council and
State Historic Preservation Officer

Cc: David Waldner, Rebecca Turner (KYTC-DEA)



COMMERCE CABINET
KENTUCKY HERITAGE COUNCIL

Ernie Fletcher
Governor

The State Historic Preservation Office
300 Washington Street
Frankfort, Kentucky 40601
Phone (502) 564-7005
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www.kentucky.gov
October 3, 2007

George Ward
Secretary
Donna M. Neary
Executive Director and
State Historic Preservation Officer

Ms. Bernadette Dupont
Planning and Environmental Engineer
Federal Highway Administration
330 West Broadway
Frankfort, KY 40601

Re: Phase 1 History/Architecture Survey for the Brent Spence Bridge Replacement Project, Kenton County, Kentucky (Item No. 6-17.00)

Dear Ms. Dupont:

The State Historic Preservation Office has received for review and approval the above referenced report. In order, to facilitate this project we have attempted to evaluate the 54 properties illustrated in this report, even though the report does not meet the Kentucky Heritage Council's *Specifications for Conducting Fieldwork and Preparing Cultural Resource Assessment Reports*.

Below is a list of properties we consider potentially eligible for listing in the National Register of Historic Places (NRHP) and for which we need additional information in order to determine if they are eligible for listing in the NRHP, either individually or as part of a district. We also request that Kentucky Historic Resources Inventory forms be completed for each of the properties that do not already have a state site number and that these forms be submitted to this office, at your earliest convenience. Finally, we request that all future historic structures survey reports generated as part of this undertaking conform to the Kentucky Heritage Council's *Specifications for Conducting Fieldwork and Preparing Cultural Resource Assessment Reports*. The fieldwork and reporting standards outlined in this document were developed in consultation with federal and state agencies as well as the consulting community, and have been widely accepted by all parties.

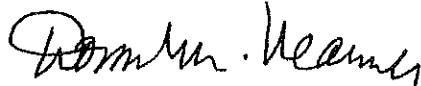
- KE-4, 50 Rivard Drive
- KEC-107, C & O Railroad Bridge
- KE-319, 3 Kyles Lane
- KEC-430, 407 Main Street
- KECL-621, 504 West 12th Street
- KECL-626, 514 West 12th Street
- KECL-628, 516 West 12th Street
- KECL-817, 533 Pike Street
- 1000 Emery Drive
- 611 Western Avenue
- 521 Western Avenue
- 609 Western Avenue
- 213 Western Avenue
- 45 Rivard Drive
- 205 Western Avenue

Ms. Dupont
Page 2
October 3, 2007

- 632 Western Avenue
- 511 Western Avenue
- 509 St. Josephs Lane
- 223 Western Avenue
- 881 Highway Avenue
- 207 Western Avenue
- 625 Crescent Avenue
- 617 Crescent Avenue
- 611 Crescent Avenue
- 527 Western Avenue
- 609 Western Avenue
- 537 Pike Street - 1060
- 533 Goetta Place

We look forward to working with FHWA on this project. Should you have any questions, feel free to contact Janie-Rice Brother of my staff at (502) 564-7005 extension 121.

Sincerely,



Donna M. Neary, Executive Director
Kentucky Heritage Council and
State Historic Preservation Officer

Cc: David Waldner, Rebecca Turner (KYTC-DEA)



STEVEN L. BESHEAR
GOVERNOR

**TOURISM, ARTS AND HERITAGE CABINET
KENTUCKY HERITAGE COUNCIL**

MARCHETA SPARROW
SECRETARY

THE STATE HISTORIC PRESERVATION OFFICE
300 WASHINGTON STREET
FRANKFORT, KENTUCKY 40601
PHONE (502) 564-7005
FAX (502) 564-5820
www.heritage.ky.gov

MARK DENNEN
ACTING EXECUTIVE DIRECTOR AND
STATE HISTORIC PRESERVATION OFFICER

May 1, 2009

Mr. Jose M. Sepulveda, Division Administrator
Kentucky Division Office
Federal Highway Administration, U.S. Department of Transportation
330 West Broadway
Frankfort, KY 40601

**Re: Phase I History/Architectural Survey for the
Brent Spence Bridge Replacement Project
Kenton County, Kentucky (KYTC Item No. 6-17.00)**

Dear Mr. Sepulveda:

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. Sec. 470f) and implementing regulations at 36 C.F.R. Part 800, the staff of the Kentucky State Historic Preservation Office received for review an application for the above referenced report on March 30, 2009. This report was prepared by Parson Brinkerhoff, but this work was largely conducted by staff of Gray & Pape with Brandon L. McCuin listed as Principal Investigator. Through communication with KYTC staff, we are of the understanding that this is a preliminary eligibility report and that a full baseline, including information from the entire construction APE will follow, detailing more precisely the project alternatives and any impacts the work will have upon the historic resources identified in this document.

The authors of this report identified 77 sites. It appears that KYTC-DEA disagreed with several of the authors' determinations, but this information is not clearly presented in the communication we received from FHWA. Furthermore, site numbers are listed in such a way that is confusing: National Register Districts are not identified in the report by KHRI survey numbers, but rather the National Register District number, making it difficult to determine which sites fall within which districts.

In letters dated September 10, 2007 and October 3, 2007, this office indicated that this survey report was not in conformance with the Kentucky Heritage Council's *Specifications for Conducting Fieldwork and Preparing Cultural Resource Assessment Reports*. Unfortunately, there are still a few deficiencies that need to be remedied in order to comply with these standards and therefore we would like to point out these discrepancies once more to ensure that the forthcoming final baseline report can be reviewed more quickly and efficiently.

- The maps reproduced in the report are at such a large scale and of poor quality as to be almost indecipherable in accurately identifying the boundaries of APE, locating identified sites, and assessing alternative's impacts. (*Specifications*, Chapter VI, F.2.a-c)
- Documentation for each site 50 years or older must include a KHC inventory form that includes a current topographic map identifying the location of each resource amongst other details. Site inventory forms were not completed for this report. (*Specifications*, Chapter V, B.2.a-b)

Despite these deficiencies, we have attempted to preliminarily assess the eligibility of some of the historic resources identified in this report with the understanding that a complete baseline will follow. However, we will withhold making

Phase I History/Architectural Survey

Brent Spence Bridge Replacement Project

any final determinations or any assessment of various project alternatives' impacts until the fully-compliant study document becomes available for our review.

We concur with some of the determinations made by FHWA, however, the listing of the sites by number in the matrix presented in your correspondence of March 25, 2009 is somewhat perplexing. We agree that Sites **KE-4, KE-319, KEC-107, KEC-459, KEC-460, KEC-462, KECL-621, KECL-626, KECL-628, KECL-817, KECL-1018, and KECL-1046** are eligible for listing in the National Register of Historic Places (NRHP). We are unaware as to what properties FHWA's listing of "Sites KECL 628-504, KECL-514, KECL-516, KECL-459-509, KEC-460-881, and KECL-1046-632" are referring. We would like to request a clarification regarding these numbers and the properties they represent.

According to the document under review, the identified National Register Districts do not have any sites numbers, rather the report labels them as single entities by their given National Register number. Therefore, **all properties within NRHP No. 83003650, NRHP No. 89001170, NRHP No. 93001165, and NRHP No. 96000281 are currently listed.**

In addition to the districts and sites aforementioned, this office finds that **Sites KEC-456, KEC-458, KECL-1053, KECL-are also eligible for listing.** Furthermore, we request additional information on Sites **KECL-1016, KECL-1032, KECL-1038, KECL-1048, KEC-1055, KEC-1059, and KECL-1060** such as deed research in order to garnish more precise construction dates, the names of past property owners, and more accurate information on the construction methods and materials present.

We look forward to reviewing the full baseline document with survey forms and working with KYTC staff to minimize the direct and indirect impacts which this project may have on significant cultural historic resources.

Should you have questions regarding these comments, please contact Danae Peckler of my staff at (502) 564-7005, extension 127.

Sincerely,



Mark Dennen
Executive Director and
State Historic Preservation Officer

Cc: David Waldner and Rebecca Turner, KYTC-DEA
Anthony Goodman, FHWA

DAP:dap



STEVEN L. BESHEAR
GOVERNOR

**TOURISM, ARTS AND HERITAGE CABINET
KENTUCKY HERITAGE COUNCIL**

MARCHETA SPARROW
SECRETARY

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MARK DENNEN
EXECUTIVE DIRECTOR AND
STATE HISTORIC PRESERVATION OFFICER

July 22, 2010

Ms. Bernadette Dupont
Transportation Specialist
U. S. Department of Transportation
Federal Highway Administration
330 West Broadway
Frankfort, KY 40601

**Re: Cultural Historic Survey for the Brent Spence Bridge Replacement Project
Kenton Co., KY (Item No. 6-17.00)**

Dear Ms. Dupont:

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (16 U. S. C. Sec. 470f) and implementing regulations at 36 C. F. R. Part 800, the Kentucky State Historic Preservation Office received for review and comment the above-referenced survey completed by Parsons Brinckerhoff in association with Gray & Pape. Brandon L. McCuin of Gray & Pape was the Principal Investigator. The project study area of the report is limited to the Kentucky side with a southern limit 5000 feet south of the midpoint of the Dixie Highway Interchange on I-71/I-75 in Fort Wright. Within the project APE 129 resources were identified.

We concur that the following identified sites **are listed** in the National Register of Historic Places: **NRHP Nos. 90000481 (KEC 50), 83003650, 89001169, 89001170, 89001585, 93001165, and 96000281.** We further concur that the following sites **are eligible** for the National Register of Historic Places: **KE 4, KEC107, KEC 456, KEC 458, KEC 459, KEC 460, KEC 462, KECL 621, KECL 626, KECL 628, KECL 817, KECL 1018, KECL 1046, and KEFM 317.**

This office had requested more information on some of the resources in response to a previously submitted report. We have reviewed the additional information provided, and **we concur that KECL 1016, KECL 1032, KECL 1038, KECL 1048, KECL 1055, KECL 1059, and KECL 1060 do not meet the criteria to be eligible for The National Register of Historic Places. We also do not concur with the finding of eligibility for resource KECL 1053.** We concur with FHWA and KYTC that the property lacks the integrity to be included in The National Register of Historic Places.

In regards to effects of the project alternatives under consideration, we concur with the findings in the report **with the exception of KEFM 317.** Neither alternative will impact the property, so there will be **No Effect** to the historic resource. We look forward to working with FHWA and KYTC to minimize the effects to other historic resources identified in the report.

Page 2

Cultural Historic Survey for the Brent Spence Bridge Replacement Project
Kenton Co., KY (Item No. 6-17.00)

If you have any questions or concerns in regards to this review, please contact Vicki Birenberg of my staff at (502) 564-7005, ext. 127.

Sincerely,



Mark Dennen
Executive Director and
State Historic Preservation Officer

cc: David Waldner – KYTC – DEA; Rebecca Turner –KYTC - DEA

MD:vmb

APPENDIX D:
Consulting Party Letters



Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

William L. (Skip) Forwood
Cincinnati Historic Conservation Office
805 Central Avenue, Suite 700
Cincinnati, Ohio 45202

Dear Consulting Partner:

Thank you for participating in the Consulting Party Process for the Brent Spence Bridge Replacement/Rehabilitation Project (HAM-71/75-0.00/0.22; KYTC Item No. 6-17) under Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR Part 800. Again, this is a consultative process, the purpose of which is to allow you a chance to comment on the historic properties that may be affected by the proposed project.

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Please provide comments on the Ohio Phase I History/Architecture report and eligibility of the two noted properties by September 28, 2007, to Stefan Spinosa (Stefan Spinosa, ODOT District 8, 505 St. Rt. 741, Lebanon, Ohio 45036 or Stefan.Spinosa@dot.state.oh.us).

Again, I thank you for participating in the Section 106 consultation process for the Brent Spence Bridge Replacement/Rehabilitation Project (HAM-71/75-0.00/0.22; KYTC Item No. 6-17).

Respectfully,

A handwritten signature in black ink, appearing to read "Stefan Spinosa".

Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

Enclosures

c: file, Rob Hans, KYTC



Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Margo Warminski
Cincinnati Preservation Association
342 West Fourth Street
Cincinnati, Ohio 45202

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Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Jane McCone
Historic Southwest Ohio, Inc. - Hauch House
P.O. Box 62475
Cincinnati, Ohio 45262

Dear Consulting Partner:

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Respectfully,

Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

Enclosures

c: file, Rob Hans, KYTC



Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Dayton Street Historic District Association
833 Dayton Street
Cincinnati, Ohio 45214

Dear Consulting Partner:

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Stefan C. Spinoso
ODOT Project Manager, Technical Services Engineer

Enclosures

c: file, Rob Hans, KYTC



Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Bob Rainey
Lower Price Hill Community Council
2175 St. Michael Street
Cincinnati, Ohio 45204

Dear Consulting Partner:

Thank you for participating in the Consulting Party Process for the Brent Spence Bridge Replacement/Rehabilitation Project (HAM-71/75-0.00/0.22; KYTC Item No. 6-17) under Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR Part 800. Again, this is a consultative process, the purpose of which is to allow you a chance to comment on the historic properties that may be affected by the proposed project.

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Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

Enclosures

c: file, Rob Hans, KYTC



Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Peter Witte
Price Hill Civic Club
P.O. Box 5096
Cincinnati, Ohio 45205

Dear Consulting Partner:

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Stefan C. Spinoso
ODOT Project Manager, Technical Services Engineer

Enclosures

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Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Robert Killins, Jr.
West End Community Council
P.O. Box 14424
Cincinnati, Ohio 45250

Dear Consulting Partner:

Thank you for participating in the Consulting Party Process for the Brent Spence Bridge Replacement/Rehabilitation Project (HAM-71/75-0.00/0.22; KYTC Item No. 6-17) under Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR Part 800. Again, this is a consultative process, the purpose of which is to allow you a chance to comment on the historic properties that may be affected by the proposed project.

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Ohio Department of Transportation

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(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Cincinnati Metropolitan Housing Authority
16 W. Central Parkway, Cincinnati, OH 45202
Cincinnati, Ohio 45202

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ODOT Project Manager, Technical Services Engineer

Enclosures

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Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Jackie Robbins
Community Revitalization Agency
1832 Freeman Avenue
Cincinnati, Ohio 45214

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ODOT Project Manager, Technical Services Engineer

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Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Steve Schuckman
Cincinnati Park Board
950 Eden Park Drive
Cincinnati, Ohio 45202

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Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Douglass W. McDonald
Cincinnati Museum Center
1301 Western Avenue
Cincinnati, Ohio 45203

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Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

Enclosures

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Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Paul Graham
ODOT, Office of Environmental Services
1980 Broad Street
Columbus, Ohio 43223

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Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

Enclosure (letter only)

c: file, Rob Hans, KYTC



Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Tim Hill
ODOT, Office of Environmental Services
1980 Broad Street
Columbus, Ohio 43223

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Stefan C. Spinoso
ODOT Project Manager, Technical Services Engineer

Enclosure (letter only)

c: file, Rob Hans, KYTC



Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Noel Alcala
ODOT, Office of Environmental Services
1980 Broad Street
Columbus, Ohio 43223

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Respectfully,

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Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

Enclosure (letter only)

c: file, Rob Hans, KYTC



Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Susan Gasbarro
ODOT, Office of Environmental Services
1980 Broad Street
Columbus, Ohio 43223

Dear Consulting Partner:

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ODOT Project Manager, Technical Services Engineer

Enclosure (letter only)

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Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

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ODOT, Office of Environmental Services
1980 Broad Street
Columbus, Ohio 43223

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Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Hans Jindal
ODOT, District Eight
505 South S.R. 741
Lebanon, Ohio 45036

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Stefan C. Spinoso
ODOT Project Manager, Technical Services Engineer

Enclosure (letter only)

c: file, Rob Hans, KYTC



Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Keith Smith
ODOT, District Eight
505 South S.R. 741
Lebanon, Ohio 45036

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Stefan C. Spinoso
ODOT Project Manager, Technical Services Engineer

Enclosure (letter only)

c: file, Rob Hans, KYTC



Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Nancy Campbell
Ohio Historic Preservation Office
567 East Hudson Street
Columbus, Ohio 43211

Dear Consulting Partner:

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Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Stacee Hans
Kentucky Transportation Cabinet, District 6
421 Buttermilk Pike
P.O. Box 17130
Covington, KY 41017

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Ohio Department of Transportation

District Eight, 505 South S.R. 741, Lebanon, Ohio 45036-9518

(513) 932-3030 or 1-800-831-2142

Production Administration

August 31, 2007

Tim Foreman
KYTC, Division of Environmental Analysis
200 Mero Street
Frankfort, KY 40622

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August 31, 2007

Mark VonderEmbse
FHWA , Urban Programs Engineer
200 N. High Street
Columbus, Ohio 43215

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August 31, 2007

Name

Organization

Address

Cincinnati, Ohio Zip Code

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OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 8 • 505 S. ST. RT. 741 • LEBANON, OH 45036 • (800) 831-2142

Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

William L. (Skip) Forwood
Cincinnati Historic Conservation Office
805 Central Avenue, Suite 700
Cincinnati, Ohio 45202

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ODOT Project Manager, Technical Services Engineer

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OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 8 • 505 S. ST. RT. 741 • LEBANON, OH 45036 • (800) 831-2142

Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Margo Warminski
Cincinnati Preservation Association
342 W. Fourth Street
Cincinnati, Ohio 45202

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OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 8 • 505 S. ST. RT. 741 • LEBANON, OH 45036 • (800) 831-2142

Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Jane McCone
Historic Southwest Ohio, Inc. - Hauch House
P.O. Box 62475
Cincinnati, Ohio 45262

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ODOT Project Manager, Technical Services Engineer

Enclosures

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OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 8 • 505 S. ST. RT. 741 • LEBANON, OH 45036 • (800) 831-2142

Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Norman P. Kattelman
Dayton Street Historic District
938 Dayton Street
Cincinnati, Ohio 45214

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Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

Enclosures

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OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 8 • 505 S. ST. RT. 741 • LEBANON, OH 45036 • (800) 831-2142

Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Norman P. Kattelman
West End Community Council
938 Dayton Street
Cincinnati, Ohio 45214

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Respectfully,

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Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

Enclosures

c: file, Rob Hans, KYTC



OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 8 • 505 S. ST. RT. 741 • LEBANON, OH 45036 • (800) 831-2142

Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Bob Rainey
Lower Price Hill Community Council
2175 St. Michael Street
Cincinnati, Ohio 45204

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Peter Witte
Price Hill Civic Club
P.O. Box 5096
Cincinnati, Ohio 45205

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OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 8 • 505 S. ST. RT. 741 • LEBANON, OH 45036 • (800) 831-2142

Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Cincinnati Metropolitan Housing Authority
16 W. Central Parkway
Cincinnati, Ohio 45202

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Enclosures

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OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 8 • 505 S. ST. RT. 741 • LEBANON, OH 45036 • (800) 831-2142

Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Jackie Robbins
Community Revitalization Agency
1832 Freeman Avenue
Cincinnati, Ohio 45214

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Steve Schuckman
Cincinnati Park Board
950 Eden Park Drive
Cincinnati, Ohio 45202

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Douglass V. McDonald
Cincinnati Museum Center
1301 Western Avenue
Cincinnati, Ohio 45203

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Jolene M. Molitoris
Director

Ted Strickland
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District 8 Deputy Director

June 2, 2009

Jenny Edwards
818 Dayton Street
Cincinnati, Ohio 45214

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Mark Vonder Embse
FHWA, Urban Programs Engineer
200 N. High Street
Columbus, Ohio 43215

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Scott Schurman
KYTC, Division of Environmental Analysis
200 Mero Street
Frankfort, Kentucky 40622

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Stacey Hans
Kentucky Transportation Cabinet, District 6
421 Buttermilk Pike
P.O. Box 17130
Covington, Kentucky 41017

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Keith Smith
ODOT, District 8 Planning and Environmental Engineer (Acting)
505 South SR 741
Lebanon, Ohio 45036

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Enclosures

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OHIO DEPARTMENT OF TRANSPORTATION

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

June 2, 2009

Stefan Spinosa
ODOT District 8, Technical Services Engineer
505 South SR 741
Lebanon, Ohio 45036

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

William L. (Skip) Forwood
Cincinnati Historic Conservation Office
805 Central Avenue, Suite 700
Cincinnati, Ohio 45202

Dear Consulting Partner:

Thank you for participating in the Consulting Party Process for the Brent Spence Bridge Replacement/Rehabilitation Project (HAM-71/75-0.00/0.22; KYTC Item No. 6-17) under Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR Part 800. Again, this is a consultative process, the purpose of which is to allow you a chance to comment on the historic properties that may be affected by the proposed project. Since our last communication with you in June of 2009, the project team has continued with project development and has completed additional evaluation of a potentially historic property within the project's study area.

The Ohio Phase II History/Architecture addendum that addresses the West Virginia Coal and Coke building only is available for review and comments. The Ohio State Historic Preservation Office (OSHPO) has reviewed this report and concurred with the findings of the Ohio Phase II History/Architecture addendum report that the property is not eligible for listing on the National Register of Historic Places. A copy of the OSHPO's concurrence letter is enclosed. Please provide comments on the eligibility of the West Virginia Coal and Coke Company, 725 Front Street. A hard copy of the Phase II report can be provided upon request.

Please provide comments on the Ohio Phase II History/Architecture report and eligibility of the noted property by November 23, 2009, to Stefan Spinosa (Stefan Spinosa, ODOT District 8, 505 St. Rt. 741, Lebanon, Ohio 45036 or Stefan.Spinosa@dot.state.oh.us).

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Enclosures

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OHIO DEPARTMENT OF TRANSPORTATION

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Margo Warminski
Cincinnati Preservation Association
342 W. Fourth Street
Cincinnati, Ohio 45202

Dear Consulting Partner:

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Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

Enclosures

cc: file, John Eckler, KYTC



OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 8 • 505 S. ST. RT. 741 • LEBANON, OH 45036 • (800) 831-2142

Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Jane McCone
Historic Southwest Ohio, Inc. - Hauch House
P.O. Box 62475
Cincinnati, Ohio 45262

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Norman P. Kattelman
Dayton Street Historic District
938 Dayton Street
Cincinnati, Ohio 45214

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Norman P. Kattelman
West End Community Council
938 Dayton Street
Cincinnati, Ohio 45214

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Bob Rainey
Lower Price Hill Community Council
2175 St. Michael Street
Cincinnati, Ohio 45204

Dear Consulting Partner:

Thank you for participating in the Consulting Party Process for the Brent Spence Bridge Replacement/Rehabilitation Project (HAM-71/75-0.00/0.22; KYTC Item No. 6-17) under Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR Part 800. Again, this is a consultative process, the purpose of which is to allow you a chance to comment on the historic properties that may be affected by the proposed project. Since our last communication with you in June of 2009, the project team has continued with project development and has completed additional evaluation of a potentially historic property within the project's study area.

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Peter Witte
Price Hill Civic Club
P.O. Box 5096
Cincinnati, Ohio 45205

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Cincinnati Metropolitan Housing Authority
16 W. Central Parkway
Cincinnati, Ohio 45202

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Jackie Robbins
Community Revitalization Agency
1832 Freeman Avenue
Cincinnati, Ohio 45214

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
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October 22, 2009

Steve Schuckman
Cincinnati Park Board
950 Eden Park Drive
Cincinnati, Ohio 45202

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Douglass V. McDonald
Cincinnati Museum Center
1301 Western Avenue
Cincinnati, Ohio 45203

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Jenny Edwards
818 Dayton Street
Cincinnati, Ohio 45214

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Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Mark Vonder Embse
FHWA, Urban Programs Engineer
200 N. High Street
Columbus, Ohio 43215

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Scott Schurman
KYTC, Division of Environmental Analysis
200 Mero Street
Frankfort, Kentucky 40622

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

October 22, 2009

Stacey Hans
Kentucky Transportation Cabinet, District 6
421 Buttermilk Pike
P.O. Box 17130
Covington, Kentucky 41017

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

William L. (Skip) Forwood
Cincinnati Historic Conservation Office
805 Central Avenue, Suite 700
Cincinnati, Ohio 45202

Dear Consulting Partner:

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Respectfully,

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Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

enclosures

c: Smith, Hoffman, John Eckler (KYTC), file



OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 8 • 505 S. ST. RT. 741 • LEBANON, OH 45036 • (800) 831-2142

Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Margo Warminski
Cincinnati Preservation Association
342 W. Fourth Street
Cincinnati, Ohio 45202

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Jane McCone
Historic Southwest Ohio, Inc. - Hauch House
P.O. Box 62475
Cincinnati, Ohio 45262

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Norman P. Kattelman
Dayton Street Historic District
West End Community Council
938 Dayton Street
Cincinnati, Ohio 45214

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Bob Rainey
Lower Price Hill Community Council
2175 St. Michael Street
Cincinnati, Ohio 45204

Dear Consulting Partner:

Thank you for participating in the Consulting Party Process for the Brent Spence Bridge Replacement/Rehabilitation Project (HAM-71/75-0.00/0.22; KYTC Item No. 6-17) under Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR Part 800. Again, this is a consultative process, the purpose of which is to allow you a chance to comment on the historic properties that may be affected by the proposed project. Since our last communication with you in June of 2009, the project team has continued with project development and has completed additional evaluation of the potentially historic properties within the project's study area.

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Peter Witte
Price Hill Civic Club
P.O. Box 5096
Cincinnati, Ohio 45205

Dear Consulting Partner:

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OHIO DEPARTMENT OF TRANSPORTATION

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Cincinnati Metropolitan Housing Authority
16 W. Central Parkway
Cincinnati, Ohio 45202

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Jolene M. Molitoris
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Ted Strickland
Governor

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District 8 Deputy Director

July 28, 2010

Jackie Robbins
Community Revitalization Agency
1832 Freeman Avenue
Cincinnati, Ohio 45214

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Steve Schuckman
Cincinnati Park Board
950 Eden Park Drive
Cincinnati, Ohio 45202

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Douglass V. McDonald
Cincinnati Museum Center
1301 Western Avenue
Cincinnati, Ohio 45203

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Jolene M. Molitoris
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Ted Strickland
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Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Jenny Edwards
818 Dayton Street
Cincinnati, Ohio 45214

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Jolene M. Molitoris
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Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Mark Vonder Embse
FHWA, Urban Programs Engineer
200 N. High Street
Columbus, Ohio 43215

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Scott Schurman
KYTC, Division of Environmental Analysis
200 Mero Street
Frankfort, Kentucky 40622

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Stacee Hans
Kentucky Transportation Cabinet, District 6
421 Buttermilk Pike
P.O. Box 17130
Covington, Kentucky 41017

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Respectfully,

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Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

enclosures

c: Smith, Hoffman, John Eckler (KYTC), file



OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 8 • 505 S. ST. RT. 741 • LEBANON, OH 45036 • (800) 831-2142

Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Keith Smith
ODOT, District 8 Planning and Environmental Engineer (Acting)
505 South SR 741
Lebanon, Ohio 45036

Dear Consulting Partner:

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OHIO DEPARTMENT OF TRANSPORTATION

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

July 28, 2010

Larry Hoffman
ODOT, Office of Environmental Services
1980 Broad Street
Columbus, Ohio 43223

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ODOT Project Manager, Technical Services Engineer

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OHIO DEPARTMENT OF TRANSPORTATION

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

William L. (Skip) Forwood
Cincinnati Historic Conservation Office
805 Central Avenue, Suite 700
Cincinnati, Ohio 45202

Dear Consulting Partner:

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Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

Enclosures
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OHIO DEPARTMENT OF TRANSPORTATION

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

Margo Warminski
Cincinnati Preservation Association
342 W. Fourth Street
Cincinnati, Ohio 45202

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

Nadine Friedman
Historic Southwest Ohio, Inc. - Hauch House
P.O. Box 62475
Cincinnati, Ohio 45262

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

Norman P. Kattelman
Dayton Street Historic District
938 Dayton Street
Cincinnati, Ohio 45214

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OHIO DEPARTMENT OF TRANSPORTATION

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

Norman P. Kattelman
West End Community Council
938 Dayton Street
Cincinnati, Ohio 45214

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OHIO DEPARTMENT OF TRANSPORTATION

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

Jack Degano
Lower Price Hill Community Council
2104 St. Michael Street
Cincinnati, Ohio 45204

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

Peter Witte
Price Hill Civic Club
P.O. Box 5096
Cincinnati, Ohio 45205

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OHIO DEPARTMENT OF TRANSPORTATION

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

Cincinnati Metropolitan Housing Authority
16 W. Central Parkway
Cincinnati, Ohio 45202

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OHIO DEPARTMENT OF TRANSPORTATION

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

Jackie Robbins
Community Revitalization Agency
1832 Freeman Avenue
Cincinnati, Ohio 45214

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Stefan C. Spinosa
ODOT Project Manager, Technical Services Engineer

Enclosures
cc: file, John Eckler, KYTC



OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 8 • 505 S. ST. RT. 741 • LEBANON, OH 45036 • (800) 831-2142

Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

Steve Schuckman
Cincinnati Park Board
950 Eden Park Drive
Cincinnati, Ohio 45202

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

Douglass V. McDonald
Cincinnati Museum Center
1301 Western Avenue
Cincinnati, Ohio 45203

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Jolene M. Molitoris
Director

Ted Strickland
Governor

Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

Jenny Edwards
818 Dayton Street
Cincinnati, Ohio 45214

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Director

Ted Strickland
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Hans R. Jindal, P.E.
District 8 Deputy Director

September 2, 2010

Mark Vonder Embse
FHWA, Urban Programs Engineer
200 N. High Street
Columbus, Ohio 43215

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Ted Strickland
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September 2, 2010

Scott Schurman
KYTC, Division of Environmental Analysis
200 Mero Street
Frankfort, Kentucky 40622

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Ted Strickland
Governor

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Keith Smith
ODOT, District 8 Planning and Environmental Engineer (Acting)
505 South SR 741
Lebanon, Ohio 45036

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Ted Strickland
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Larry Hoffman
ODOT, Office of Environmental Services
1980 Broad Street
Columbus, Ohio 43223

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Ted Strickland
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Michael Schweitzer
Longworth Hall
700 W. Pete Rose Way
Cincinnati, Ohio 45203

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Transportation Cabinet

Department of Highways, District 6 Office
421 Buttermilk Pike, P.O. Box 17130
Covington, Kentucky 41017
(859) 341-2700
www.kentucky.gov

Ernie Fletcher
Governor

Bill Nighbert
Secretary

Marc Williams
Commissioner of Highways

November 12, 2007

Ralph Drees
Kenton County Fiscal Court - Judge Executive
303 Court Street
Covington, Kentucky 41011

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KYTC Project Manager, TEBM - Planning

Enclosures

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Bill Nighbert
Secretary

Marc Williams
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November 12, 2007

Butch Callery
Mayor, City of Covington
638 Madison Avenue
Covington, Kentucky 41011

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November 12, 2007

Ashley Tongret
City of Covington, Historic Preservation
638 Madison Avenue
Covington, Kentucky 41011

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Governor

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Marc Williams
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November 12, 2007

Rebecca Weber
Lewisburg Neighborhood Association
730 Lewis Street
Covington, Kentucky 41011

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Suzann Gettys
Covington Neighborhood Services
638 Madison Avenue, Suite 407
Covington, Kentucky 41011

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Robert A. Hans, P.E.
KYTC Project Manager, TEBM - Planning

Enclosures

c: file, Stefan Spinosa, ODOT



Transportation Cabinet

Department of Highways, District 6 Office
421 Buttermilk Pike, P.O. Box 17130
Covington, Kentucky 41017
(859) 341-2700
www.kentucky.gov

Bill Nighbert
Secretary

Marc Williams
Commissioner of Highways

Ernie Fletcher
Governor

November 12, 2007

Douglass McDonald
Cincinnati Museum Center
1301 Western Avenue
Cincinnati, Ohio 45203

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Governor

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Commissioner of Highways

November 12, 2007

Joe Schamer
Kenton Hills
1209 Devou Woods Drive
Covington, Kentucky 41011

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Governor

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Marc Williams
Commissioner of Highways

November 12, 2007

Wes Bittlinger
West Covington/Botany Hills
1417 Livingston Street
Covington, Kentucky 41016

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Secretary

Marc Williams
Commissioner of Highways

November 12, 2007

Ron Einhaus
Botany Hills Neighborhood
1253 Parkway
Covington, Kentucky 41011

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Bill Nighbert
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Marc Williams
Commissioner of Highways

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November 12, 2007

Bill Clark
Westside Action Coalition
422 Watkins Street
Covington, Kentucky 41011

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November 12, 2007

Jerry Bamberger
Mainstrasse Village Association
406 West Sixth Street #201
Covington, Kentucky 41011

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Marc Williams
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November 12, 2007

Mary Murray
Federal Highway Administration - Kentucky Division
330 West Broadway
Frankfort, Kentucky 40601

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KYTC, Division of Environmental Analysis
200 Mero Street
Frankfort, Kentucky 40622

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KYTC District 6
421 Buttermilk Pike
PO Box 17130
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KYTC, Division of Environmental Analysis
200 Mero Street
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KYTC, Division of Environmental Analysis
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KYTC, Division of Environmental Analysis
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Janie Rice-Brother
Kentucky Heritage Council
300 Washington Street
Frankfort, Kentucky 40601

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David Pollack
Kentucky Heritage Council
300 Washington Street
Frankfort, Kentucky 40622

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Noel Alcala
ODOT, Office of Environmental Services
1980 Broad Street
Columbus, Ohio 43223

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Again, I thank you for participating in the Section 106 consultation process for the Brent Spence Bridge Replacement/Rehabilitation Project (KYTC Item No. 6-17).

Respectfully,

A handwritten signature in black ink that reads "Robert A. Hans".

Robert A. Hans, P.E.
KYTC Project Manager, TEBM - Planning

Enclosures

c: file, Stefan Spinosa, ODOT



TRANSPORTATION CABINET

Frankfort, Kentucky 40622
www.kentucky.gov

Steven L. Beshear
Governor

Michael W. Hancock, P.E.
Secretary

September 27, 2010

Denny Bowman
Mayor, City of Covington
638 Madison Avenue
Covington, Kentucky 41011

Dear Consulting Party:

Thank you for participating in the Consulting Party Process for the Brent Spence Bridge Replacement/Rehabilitation Project (KYTC Item No. 6-17.00) under Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR Part 800. Again, this is a consultative process, the purpose of which is to allow you a chance to comment on the historic properties that may be affected by the proposed project.

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Again, I thank you for participating in the Section 106 consultation process for the Brent Spence Bridge Replacement/Rehabilitation Project (KYTC Item No. 6-17).

Respectfully,

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John Eckler, P.E.
KYTC, District 6 Project Manager

Enclosures
cc: file, Stefan Spinosa, ODOT



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Frankfort, Kentucky 40622
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Steven L. Beshear
Governor

Michael W. Hancock, P.E.
Secretary

September 27, 2010

Beth Johnson
City of Covington, Historic Preservation
638 Madison Avenue
Covington, Kentucky 41011

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Respectfully,

John Eckler, P.E.
KYTC, District 6 Project Manager

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Steven L. Beshear
Governor

Michael W. Hancock, P.E.
Secretary

September 27, 2010

Rebecca Weber
Lewisburg Neighborhood Association
730 Lewis Street
Covington, Kentucky 41011

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John Eckler, P.E.
KYTC, District 6 Project Manager

Enclosures
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Governor

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September 27, 2010

Suzann Gettys
Covington Neighborhood Services
638 Madison Avenue, Suite 407
Covington, Kentucky 41011

Dear Consulting Party:

Thank you for participating in the Consulting Party Process for the Brent Spence Bridge Replacement/Rehabilitation Project (KYTC Item No. 6-17.00) under Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR Part 800. Again, this is a consultative process, the purpose of which is to allow you a chance to comment on the historic properties that may be affected by the proposed project.

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John Eckler, P.E.
KYTC, District 6 Project Manager

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Steven L. Beshear
Governor

Michael W. Hancock, P.E.
Secretary

September 27, 2010

Joe Schamer
Kenton Hills
1209 Devou Woods Drive
Covington, Kentucky 41011

Dear Consulting Party:

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John Eckler, P.E.
KYTC, District 6 Project Manager

Enclosures
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Steven L. Beshear
Governor

Michael W. Hancock, P.E.
Secretary

September 27, 2010

Wes Bittlinger
West Covington/Botany Hills
1417 Livingston Street
Covington, Kentucky 41016

Dear Consulting Party:

Thank you for participating in the Consulting Party Process for the Brent Spence Bridge Replacement/Rehabilitation Project (KYTC Item No. 6-17.00) under Section 106 of the National Historic Preservation Act and the implementing regulations at 36 CFR Part 800. Again, this is a consultative process, the purpose of which is to allow you a chance to comment on the historic properties that may be affected by the proposed project.

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John Eckler, P.E.
KYTC, District 6 Project Manager

Enclosures
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Steven L. Beshear
Governor

Michael W. Hancock, P.E.
Secretary

September 27, 2010

Ron Einhaus
Botany Hills Neighborhood
1253 Parkway
Covington, Kentucky 41011

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John Eckler, P.E.
KYTC, District 6 Project Manager

Enclosures
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Steven L. Beshear
Governor

Michael W. Hancock, P.E.
Secretary

September 27, 2010

Bernadette Dupont
Federal Highway Administration - Kentucky Division
330 West Broadway
Frankfort, Kentucky 40601

Dear Consulting Party:

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John Eckler, P.E.
KYTC, District 6 Project Manager

Enclosures
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Steven L. Beshear
Governor

Michael W. Hancock, P.E.
Secretary

September 27, 2010

Scott Schurman
KYTC, Division of Environmental Analysis
200 Mero Street
Frankfort, Kentucky 40622

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Frankfort, Kentucky 40622
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Steven L. Beshear
Governor

Michael W. Hancock, P.E.
Secretary

September 27, 2010

Rebecca Turner
KYTC, Division of Environmental Analysis
200 Mero Street
Frankfort, Kentucky 40622

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John Eckler, P.E.
KYTC, District 6 Project Manager

Enclosures
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Frankfort, Kentucky 40622
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Steven L. Beshear
Governor

Michael W. Hancock, P.E.
Secretary

September 27, 2010

David Waldner
KYTC, Division of Environmental Analysis
200 Mero Street
Frankfort, Kentucky 40622

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John Eckler, P.E.
KYTC, District 6 Project Manager

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Steven L. Beshear
Governor

Michael W. Hancock, P.E.
Secretary

September 27, 2010

Mark Dennan
Kentucky Heritage Council, SHPO
300 Washington Street
Frankfort, Kentucky 40622

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