



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

Federal Highway Administration
Kentucky Division
330 West Broadway
Frankfort KY, 40601
502-223-6720

Federal Highway Administration
Ohio Division
200 North High Street, Room 328
Columbus, OH, 43215
614-280-6896

May 14, 2026

In Reply Refer To:
HDA-OH

ELECTRONIC CORRESPONDENCE ONLY

Pamela Boratyn, Director
Ohio Department of Transportation
1980 West Broad Street
Columbus, OH 43223

Subject: Brent Spence Bridge Corridor Project Re-evaluation #3 [KYTC Project Item No. 6-17;
ODOT PID 89068]

Dear Director Boratyn:

The Federal Highway Administration (FHWA) has received your transmittal with the documentation titled “Brent Spence Bridge Corridor Project, Re-evaluation 3,” dated May 14, 2026, and including supporting documents in appendices.

In accordance with FHWA 23 CFR 771.129, this document was prepared by the Ohio Department of Transportation (ODOT) and Kentucky Transportation Cabinet (KYTC) to evaluate proposed changes to the approved action and associated impacts by addressing all current environmental requirements. The purpose of this re-evaluation is to document the consultation with FHWA to establish whether the approved environmental document, including the revised Supplemental Environmental Assessment (SEA) and the Finding of No Significant Impact (FONSI), executed May 8, 2024 [2024 SEA/FONSI], and associated documentation remain valid.

Following approval of Re-evaluation #1 on August 13, 2025, and Re-evaluation #2 on March 6, 2026, design progression led to additional design refinements in Ohio and Kentucky to support construction access and staging and to accommodate right-of-way (ROW) constraints. Further, additional consultation is described for archaeological resources in Kentucky, as are clarifications related to exhibits in previous documentation. Lastly, FHWA understands that environmental commitments included in the existing approved environmental documentation will apply to these activities, and certain existing commitments have been clarified or revised based on additional coordination; however, no additional commitments have been identified based on the project changes presented in this re-evaluation.

After review of the documentation, we concur with the KYTC and ODOT's conclusion that the approved environmental documentation, the 2024 SEA/FONSI, is still valid for the Brent Spence Bridge Corridor Project and no significant impacts exist to warrant preparation of a supplemental environmental document or additional documentation outside of this re-evaluation.

Sincerely,

Shundreka Givan
Division Administrator
Federal Highway Administration
Kentucky Division

David L. Snyder
Division Administrator
Federal Highway Administration
Ohio Division



Re-evaluation 3

TO: FHWA
FROM: Bi-state Management Team
DATE: May 14, 2026
RE: Brent Spence Bridge Corridor Project | ODOT PID 89068 | KYTC Project Item No. 6-17

1. Introduction

On May 8, 2024, the Federal Highway Administration (FHWA) approved a [Revised Supplemental Environmental Assessment](#) (SEA) and [Finding of No Significant Impact \(FONSI\)](#) (hereinafter referred to as the 2024 SEA/FONSI) for the Brent Spence Bridge (BSB) Corridor Project. The SEA accounted for updated regulatory requirements, changed site conditions, incorporated design refinements to the previously selected alternative, updated impacts due to changes (mostly reductions), further developed environmental commitments (enhancements and mitigation), and included additional National Environmental Policy Act (NEPA) re-evaluation and coordination efforts that had occurred since the original [2012 FONSI](#) was issued.

In accordance with 23 Code of Federal Regulations (CFR) 771.129, re-evaluations for the BSB Corridor Project are prepared to disclose and assess changes since issuance of the 2024 SEA/FONSI and subsequently approved re-evaluations and to confirm whether the 2024 NEPA decision remains valid.

2. Project Design Refinements and Supplemental Consultation

Following approval of [Re-evaluation 2](#) on March 6, 2026, design progression led to additional design refinements in Ohio and Kentucky to support construction access and staging and accommodate right-of-way (ROW) constraints. Section 2.1 and Section 2.2 describe these refinements. Section 2.2 also addresses an exhibit correction. Section 2.3 summarizes additional consultation required for archaeological resources in Kentucky.

For purposes of this re-evaluation, design refinements are referred to collectively as Re-eval 3 Design. For comparison purposes, design changes analyzed through Re-evaluation 2 are referred to collectively as Re-eval 2 Design.



2.1 Barge Mooring Piles

Barges are proposed to facilitate construction of the new companion bridge and rehabilitation of the existing BSB. To allow barges to moor in the Ohio River, piles are needed to provide an anchor point. As part of the U.S. Coast Guard (USCG) Bridge Permit application, conceptual barge mooring locations for the BSB Corridor Project were initially included in the temporary work plan that was submitted to the USCG on July 18, 2025, with receipt confirmed on July 29, 2025. USCG coordination has occurred throughout the project, and the temporary work plan was provided to inform the Bridge Permit application review and receive preliminary feedback. Since the initial application submittal to the USCG, design progression and ongoing coordination with the USCG resulted in refinements to the barge mooring piling layout. The layout reflected in this re-evaluation was submitted to the USCG on April 16, 2026, with receipt confirmed on April 24, 2026 (**Attachment 3**). The USCG Bridge Permit was issued on April 27, 2026. USCG work condition approval of the temporary work plan is required prior to installing the temporary mooring pilings.

Based on design progression, a total of 32 6-foot-diameter steel piles—nine in Ohio and 23 in Kentucky—will be driven directly into the riverbed from barges. **Attachment 1, Exhibit 1**, illustrates the location of the mooring pilings. It also illustrates the temporary works, including temporary trestle, in Ohio which were analyzed in [Re-evaluation 1](#) (August 2025), but were not included in a corresponding exhibit. **Attachment 1, Exhibit 2**, illustrates a typical detail for a temporary mooring piling.

Piles will be driven with a vibratory and/or impact hammer through overburden approximately to the top of weathered rock. It is expected that sufficient overburden exists, such that no drilling and anchoring into rock (i.e., filling with concrete or other material) is required. Piles will remain in place for the duration of construction, which is anticipated to be up to eight years. Following construction, temporary piles will be removed with a vibratory hammer and crane. If piles cannot be fully extracted, they will be cut below mudline to a depth approved by the USCG.

2.2 Cincinnati Sidewalks and Shared-use Paths

Concept I-W, as detailed in the [2024 SEA/FONSI](#), proposed a share-used path (SUP) along West 7th Street in Cincinnati, Ohio. Based on design progression, and through coordination with the City of Cincinnati, it was determined that ROW constraints made an SUP infeasible; therefore, a sidewalk will be constructed along West 7th Street. This change is reflected in **Attachment 4** (see Sheet 6 of 8).

In addition, **Attachment 4** includes corrections¹ to a previous exhibit included in [Re-evaluation 1](#) (August 2025) as Exhibit 13 in Appendix A. Since Re-evaluation 1, a mapping error was identified where proposed sidewalks and SUPs were not depicted correctly in Cincinnati. **Table 1** summarizes the corrections to the

¹Sheets 6 and 7 depict the correction. No other updates were required. The full corridor-wide exhibit is provided for context.



exhibit. Other than along West 7th Street, no design refinements or changes are associated with the exhibit correction, and there are no changes in previous analyses associated with the correction.

Table 1: Summary of Corridor Exhibit Corrections (Attachment 4)

Sheet Number	Street	Re-evaluation 1 (Appendix A: Exhibit 13)	Corrected Exhibit (Re-evaluation 3, Attachment 4)
Sheet 6	West 5 th Street	<ul style="list-style-type: none"> • East of I-75: sidewalk on north side of street 	<ul style="list-style-type: none"> • East of I-75: SUP on north side of street
Sheet 6	West 6 th Street	<ul style="list-style-type: none"> • East of I-75: sidewalk both sides of street • West of I-75: Sidewalk north side of street 	<ul style="list-style-type: none"> • East of I-75: sidewalk on south side of street • SUP from Central Avenue to Gest Street, extending across I-75
Sheet 6	West 7 th Street	<ul style="list-style-type: none"> • East of I-75: sidewalk both sides of street • West of I-75: sidewalk south side of street 	<ul style="list-style-type: none"> • No change east of I-75 • Sidewalk on south side of street from Burke Way to Gest Street extending across I-75 •
Sheet 6	West 9 th Street (east of I-75) West 8 th Street (west of I-75) Gest Street	<ul style="list-style-type: none"> • East of I-75: SUP on north side, sidewalk on south side of street • West of I-75: <ul style="list-style-type: none"> ○ Along West 8th Street: SUP on north and south side of street ○ Along Gest St, north and south of West 8th Street: SUP on west side of street; south of West 8th Street, sidewalk on east side of street 	<ul style="list-style-type: none"> • East of I-75: no change on south side of street • SUP on north side of street from Mound Street to the south side of Gest Street, extending across I-75 • West of I-75: <ul style="list-style-type: none"> ○ Along West 8th Street: sidewalk along north side, SUP on south side ○ Along Gest Street, north of West 8th Street, sidewalk on west side; south of West 8th Street, no change
Sheet 6	Northbound new local street between West 5 th Street and West 9 th Street	<ul style="list-style-type: none"> • East of I-75: sidewalk on east side of road from West 5th Street to West 9th Street 	<ul style="list-style-type: none"> • East of I-75: SUP on east side of road from West 5th Street to West 9th Street



Sheet Number	Street	Re-evaluation 1 (Appendix A: Exhibit 13)	Corrected Exhibit (Re-evaluation 3, Attachment 4)
Sheet 7	Ezzard Charles Drive	<ul style="list-style-type: none"> • East of I-75: sidewalk extending west along north side of street until Winchell Avenue • SUP on north side of street from Western Avenue extending across I-75 until Winchell Avenue • Sidewalk on south side of street from Western Avenue extending across I-75 until Winchell Avenue 	<ul style="list-style-type: none"> • East of I-75: <ul style="list-style-type: none"> ○ No change on north side of street ○ Sidewalk on south side of street extending until Winchell Avenue • No change extending across I-75
Sheet 7	Linn Street	<ul style="list-style-type: none"> • Sidewalk both sides of street, except on the Linn Street bridge 	<ul style="list-style-type: none"> • SUP both sides of street extending over the Linn Street bridge
Sheet 7	Gest Street	<ul style="list-style-type: none"> • SUP on west side of street 	<ul style="list-style-type: none"> • Sidewalk on west side of street

2.3 Kentucky Archaeological Resources

[Re-evaluation 1](#) (August 2025) included design progression that expanded construction limits in Kentucky along Crescent/Highway Avenue (Area 1); West 3rd, 4th, and 5th streets (Areas 2–4); northbound I-75 (Area 5); and along the Ohio River (Area 6) (**Attachment 2**, page 2). Areas 1–4 involve work within the existing ROW, total 3.53, 3.91, 1.52, and 0.07 acres respectively, and are associated with repaving, sidewalk improvements, striping, signage, and in-place replacement of existing utilities. Area 5, totaling 1.40 acres, is located within proposed ROW previously identified in Re-evaluation 1 to construct stormwater improvements. Lastly, Area 6, totaling 25.66 acres, includes clearing and grubbing along the Ohio River to support the construction staging and haul road.

These design refinements were disclosed and evaluated for all resources in Re-evaluation 1. Based on subsequent coordination and further review, KYTC determined that the Kentucky archaeological resources Area of Potential Effect (APE) did not fully reflect the extent of ground-disturbing activities associated with these six areas. While no additional design refinements or modifications have occurred within these areas since Re-evaluation 1, this re-evaluation provides additional documentation and disclosure related to the expansion of the archaeological APE in Kentucky and summarizes supplemental consultation undertaken to support compliance with Section 106 of the National Historic Preservation Act.



3. Environmental Resources, Impacts, and Mitigation and Enhancement Measures

Section 3 assesses changes to the affected environment, impacts, and mitigation and enhancement measures based on the project changes described in Section 2. Environmental resource topics not addressed in this re-evaluation remain unchanged in terms of impacts, analyses, findings, and coordination as disclosed in the 2024 SEA/FONSI and approved re-evaluation(s).

3.1 Social and Economic Resources

Land Use

As described in Section 2.1, temporary mooring pilings will be required to facilitate barge access for construction. Right of entry will be obtained from two property owners (Hamilton County, Ohio, and Duke Energy) for the nine piles in Ohio. In Kentucky, 14 piles are located on property owned by the City of Covington and are within temporary easements previously identified in [Re-evaluation 1](#) (August 2025). The remaining nine piles in Kentucky are in the portion of the Ohio River owned by the State of Kentucky, and no easements or ROW are required by the State of Kentucky. Therefore, Re-eval 3 Design does not require additional easements or ROW acquisition.

Attachment 4 illustrates the existing and proposed ROW and easements for the project.

Travel Patterns and Access

Re-eval 3 Design does not introduce major changes to pedestrian and bicycle travel patterns and access. As described in Section 2.2, based on design progression, due to ROW constraints along West 7th Street, a sidewalk will be installed instead of an SUP. This will maintain existing pedestrian and bicycle access across I-75 at West 7th Street. See Section 4, Environmental Commitments, for further details on commitments related to West 7th Street.

The remainder of the changes described in Section 2.2 are not design refinements, but rather corrections and clarifications to mapping. Consistent with the findings of [Re-evaluation 1](#) (August 2025), the new and improved pedestrian and bicycle infrastructure incorporated into the project is anticipated to benefit pedestrian and bicycle mobility.



3.2 Ecological Resources

Streams and Rivers

Based on the changes described in Section 2.1, 32 6-foot-diameter piles will be driven into the Ohio River to facilitate barge mooring during construction: nine in Ohio and 23 in Kentucky. Per coordination with the U.S. Army Corps of Engineers (USACE), the pilings are integral to the bridge work and are not regulated by the USACE under Section 10 of the Rivers and Harbors Act or Section 404 of the Clean Water Act (**Attachment 1**). As described in Section 2.1, following construction the temporary piles will be removed with a vibratory hammer and crane. If piles cannot be fully extracted, they will be cut below mudline to a depth approved by the USCG.

Once the USACE confirmed that the barge mooring pilings were not regulated by the USACE under Section 10 or Section 404, that determination was shared with the state agencies responsible for the Section 401 Water Quality Certification (Kentucky Division of Water and Ohio Environmental Protection Agency; **Attachment 3**).

Ohio River Navigation

As described in Section 2.1, conceptual barge mooring locations were initially included in the temporary work plan that was submitted to the USCG in July 2025. USCG coordination has occurred throughout the project, and the temporary work plan was provided to inform the Bridge Permit review and to receive preliminary feedback. Since the initial application submittal to the USCG, design progression and ongoing coordination with the USCG resulted in refinements to the barge mooring pile layout. The most recent layout, which is reflected in this re-evaluation, was submitted to the USCG on April 16, 2026, with receipt confirmed on April 24, 2026 (**Attachment 3**). On April 27, 2026, the USCG issued the Bridge Permit. USCG work condition approval of the temporary work plan is required prior to installing the temporary mooring pilings.

Consistent with the 2024 SEA/FONSI, the navigation channel of the Ohio River will be maintained during construction. In accordance with 2024 SEA/FONSI Commitment 40, FHWA notified the National Park Service (NPS) on May 6, 2026, of access restrictions affecting the Lewis and Clark National Historic Trail (NHT) and requested input on the placement and design of advanced notification signage to alert trail users of project-related activities or access restrictions in the Ohio River. NPS coordination is ongoing. The notification also acknowledged that the auto route associated with the Lewis and Clark NHT transits the project area; however, no current signs for wayfinding are within the project area. Mapping of the Lewis and Clark NHT can be viewed online on the [Lewis and Clark NHT Visitor Centers and Museums Map](#).

To comply with SEA/FONSI Commitment 40, a total of eight advanced notification signs will be installed upstream and downstream of the companion bridge and existing BSB to notify users of bridge construction. These will be placed along the Ohio River at 300-foot and one-mile intervals, amounting to four signs upstream and four signs downstream. Signs will be installed above the ordinary high water mark. In addition, a total of three signs will be installed to notify users that they must use the navigation channel. These signs will be placed at the Smale Riverfront Park, Riverwalk Trailhead (formerly Riverfront Commons Trail), and Cincinnati Jr. Rowing Club. **Attachment 1, Exhibit 3**, illustrates the planned



signage locations. Access and placement of all signs will be coordinated with property owners and are anticipated to be accomplished through right of entry agreements. All signs will be in place for the duration of construction and will be removed upon completion of construction. In addition, marine operations, such as marinas, within five miles upstream and downstream of construction activity will be notified of work activities and access restrictions.

Threatened or Endangered Species

In the fall of 2025, BioSurvey Group conducted a mussel salvage and relocation in project impact areas, during which 60 live non-listed mussels across 12 species were collected, demonstrating low mussel density within impact areas. These findings, as well as a review of existing conditions of the project impact areas, are detailed in *Brent Spence Bridge Corridor Project – Mussel Relocation Report* (BioSurvey Group 2025). As described in Section 3.2, a total of 32 pilings will be installed in the Ohio River—nine in Ohio and 23 in Kentucky. Of this, five piles in Ohio and 13 piles in Kentucky fall outside the 2025 mussel salvage and relocation area (**Attachment 1: Exhibit 4**).²

Based on the 2025 survey results, the estimated mussel density within the salvage areas in the right descending bank of the Ohio River is 0.001 mussels/m², corresponding to approximately 0.02 mussels within the proposed piling direct impact areas. Estimated mussel density within the salvage areas in the left descending bank of the Ohio River is 0.012 mussels/m², corresponding to approximately 0.31 mussels within the proposed piling direct impact areas. Using the estimated mussel density in both right and left descending banks and a 5-meter salvage buffer around each piling, fewer than one mussel (approximately 0.33) is estimated to occur within the direct piling impact areas. If the areas were salvaged with a 5-meter buffer around each piling per the Ohio Mussel Survey Protocol, approximately 14 mussels may be located in the salvage zones. These estimates are based on observed mussel densities from the 2025 salvage effort and represent the best available information for the BSB Corridor Project. None of the pilings are located in the areas of highest mussel density downstream of the pier and closer to the center of the channel.

While the substrate and flow regime of the Ohio River provides suitable habitat for federally listed mussel species, none were found during the 2022 pre-construction mussel survey or the more extensive mussel salvage effort undertaken by the project team in 2025, which suggests probable absence from the area of direct impact and subsequent buffer areas. With implementation of sediment and erosion control measures during construction³, suitable habitat will likely continue to support mussel species in the future. Given this, KYTC made a “may affect, not likely to adversely affect” determination for all listed mussel species (**Attachment 3**). This determination is consistent with [Re-evaluation 1](#) (August 2025). In a letter

² KYTC correspondence with USFWS describes pile locations as the right descending bank (Ohio) and left descending bank (Kentucky); however, these descriptors do not accurately correspond to the state boundaries.

³ 2024 SEA/FONSI Commitment 8 and Commitment 32

dated April 8, 2026, the U.S. Fish and Wildlife Service (USFWS) concluded that the requirements of Section 7 of the Endangered Species Act (ESA) have been fulfilled by the project (**Attachment 3**).

In addition, additional mussel salvage for federally listed and non-federally listed species was evaluated to determine compliance with 2024 SEA/FONSI Commitment 8.a, which requires mussel salvage (relocation) in accordance with the Ohio Mussel Survey Protocol. Based on the aforementioned assessment using observed mussel densities and the conclusion of probable absence within the area of direct impact and associated buffer areas, as well as USFWS' conclusion that the requirements of Section 7 of the ESA have been satisfied, it was determined that further mussel salvage for the temporary mooring pilings was not required. The Ohio Department of Natural Resources concurred with this determination in an email dated March 10, 2026 (**Attachment 3**).

While not required for the temporary mooring pilings within this re-evaluation, 2024 SEA/FONSI Commitment 8.a remains applicable for the overall BSB Corridor Project.

3.3 Cultural Resources

There are no changes to history/architecture resources in either state and no changes to archaeological resources in Ohio.

As described in Section 2.3, six areas totaling approximately 36.09 acres were identified in Kentucky that fall outside areas previously surveyed for archaeological resources as part of the BSB Corridor Project. Areas 1–4 are in previously disturbed existing ROW. Area 5 involves new ROW; however, the area does not retain archaeological integrity due to residential landscape modifications and eroded steep slopes. Area 6 is located along the Ohio Riverbank, where an archaeological survey was conducted in 2015 to support construction of the Riverfront Commons Trail (now known as the Riverwalk). That investigation included backhoe trenching and did not identify intact buried surfaces or archaeological sites. Four structural features—two poured concrete wall foundations associated with a coal incline and a possible section of brick street and sidewalk dating to circa 1900—were identified and determined not significant. The Kentucky State Historic Preservation Office (SHPO) concurred with these findings on November 9, 2015.

Based on KYTC's review of current mapping, aerials, development and utilities, as well as historic mapping and recent archaeological documentation for the BSB Corridor Project, no previously recorded sites were identified within or immediately adjacent to the project footprint. In a letter dated March 27, 2026, KYTC requested concurrence from the Kentucky SHPO that these additional areas do not retain integrity and do not warrant a Phase I archaeological survey. The Kentucky SHPO concurred on April 1, 2026. In a letter dated April 22, 2026, FHWA re-initiated consultation with 14 tribes regarding these changes and KYTC's findings and requested comments by May 13, 2026. The tribes consulted included the Absentee-Shawnee Tribe of Oklahoma, Cherokee Nation, Delaware Tribe of Indians, Eastern Band of Cherokee Indians, Eastern Shawnee Tribe of Oklahoma, Osage Nation, Miami Tribe of Oklahoma, Peoria Tribe of Indians of Oklahoma, Pokagon Band of Potawatomi, United Keetoowah Band of Cherokee Indians, Saginaw Chippewa Indian Tribe of Michigan, Wyandotte Nation, the Shawnee Tribe, and Seneca Nation of Indians. To date, one tribe has responded (Shawnee Tribe) and indicated they have no issues or concerns at this time. No other responses have been received.



Section 106 consultation is provided in **Attachment 2**, including a representative tribal consultation letter. Due to the revised archaeological APE in Kentucky, an administrative update to the Section 106 Programmatic Agreement (PA) will be completed. The update will be limited to Exhibit 1 of the PA to reflect the revised archaeological APE consistent with consultation conducted as part of this re-evaluation. The Advisory Council on Historic Preservation and consulting parties will be notified of the update.

3.4 Permits

As noted in Section 3.2, the temporary piles associated with barge moorings are not USACE-regulated activities under Section 10 of the Rivers and Harbors Act or Section 404 of the Clean Water Act. Therefore, no permit amendments or new permits are required.

As noted in Section 2.1, the USCG issued the Bridge Permit on April 27, 2026.

4. Environmental Commitments

The progress and status of the 2024 SEA/FONSI commitments and approved re-evaluation(s) are being tracked separately in the BSB Corridor Project Environmental Commitment Tracking spreadsheet and are reported to FHWA at agreed-upon intervals. Updates on commitments will also be provided to the public in accordance with 2024 SEA/FONSI Commitment 61. Therefore, the status of the 2024 SEA/FONSI commitments are not detailed in this re-evaluation unless they are changed from or result in a change in impacts from what was disclosed in the 2024 SEA/FONSI or approved re-evaluation(s).

There are no new commitments as a result of this re-evaluation. Changes in existing commitments since the 2024 SEA/FONSI and approved re-evaluation(s) are reflected as ~~striketrough~~ for removed text and underline for added text, as well as the reasoning for the changes described in blue text below the commitment, as provided immediately below.

- 2.e. Shared use paths will be built across I-75 on 6th Street, ~~7th Street~~, 9th Street, Linn Street, and Ezzard Charles Drive and sidewalk will be built across I-75 on 7th Street.

Re-evaluation revisions: Based on coordination with the City of Cincinnati, the proposed SUP on West 7th Street will be a sidewalk due to the constrained ROW.

68. The following measures will be implemented to minimize harm to the Queensgate Playground and Ball Field:

- a. ~~f.~~ The contractor shall notify Maddi Nuss at the Cincinnati Recreation Commission to coordinate prior to work commencing in Queensgate Park and Ball Field.
- b. ~~g.~~ The contractor shall be responsible for any damages to the playground equipment or grounds and any disturbance to the playground will be restored.



-
- c. h. The contractor shall remove and reinstall the existing baseball field fence and windscreen. Any damage to any unremoved portion of the fence or windscreen will be repaired in kind by the contractor.
- d. i. All restoration within the baseball field fence shall be sodding with topsoil.
- e. j. The contractor shall coordinate fence and irrigation replacement with the Cincinnati Recreation Commission.

Re-evaluation revisions: Sub-items were incorrectly listed in Re-evaluation 2. For clarity in documentation, the listing sequence has been corrected.

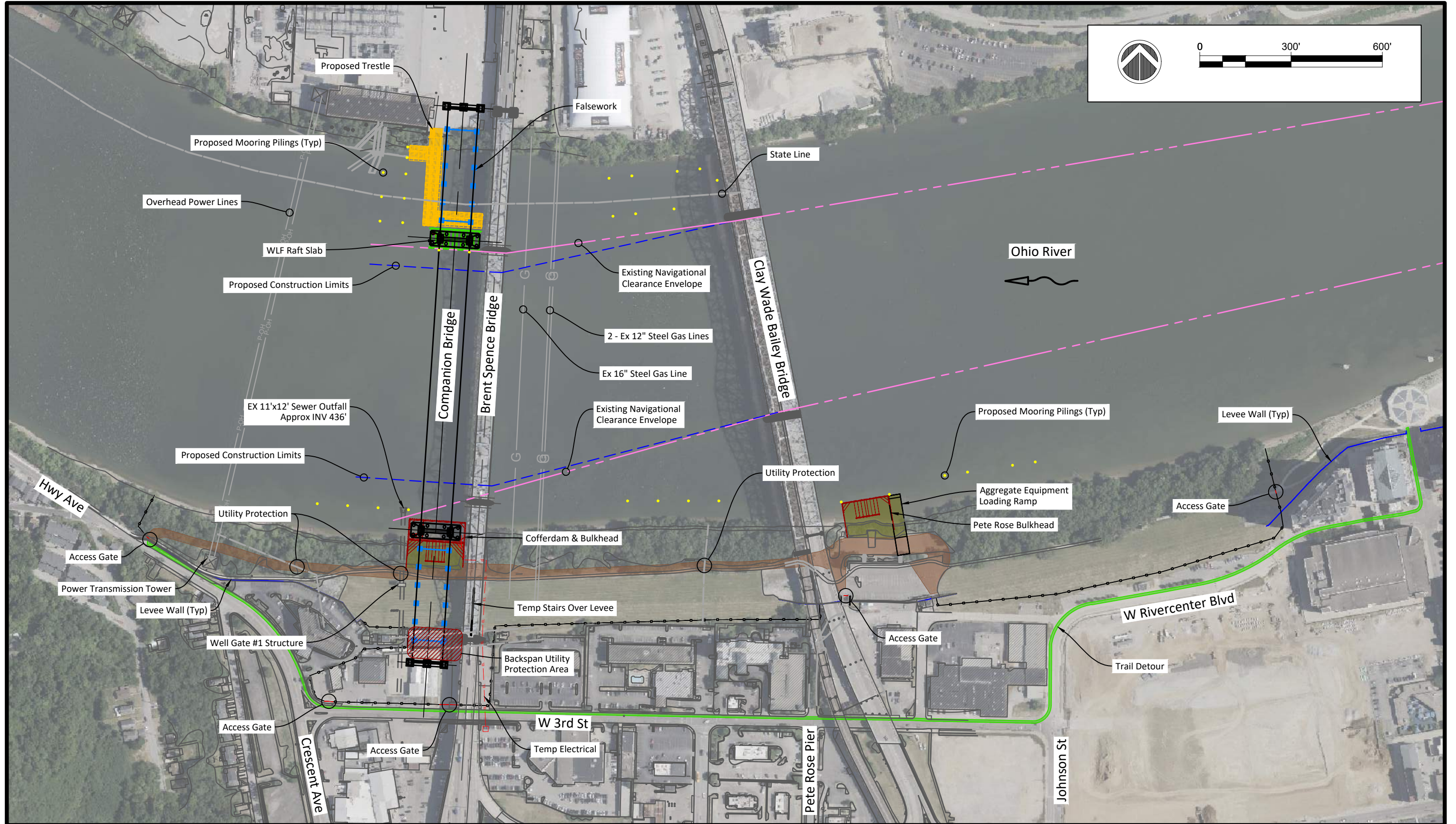
5. Conclusion

KYTC and ODOT have concluded that the May 8, 2024, FONSI is still valid for the BSB Corridor Project and no significant impacts exist to warrant preparation of a supplemental NEPA document or additional NEPA documentation outside of this re-evaluation.



Attachment 1: Ohio River Barge Mooring and Signage Exhibits

EXHIBIT 1: Barge Mooring Piling Layout

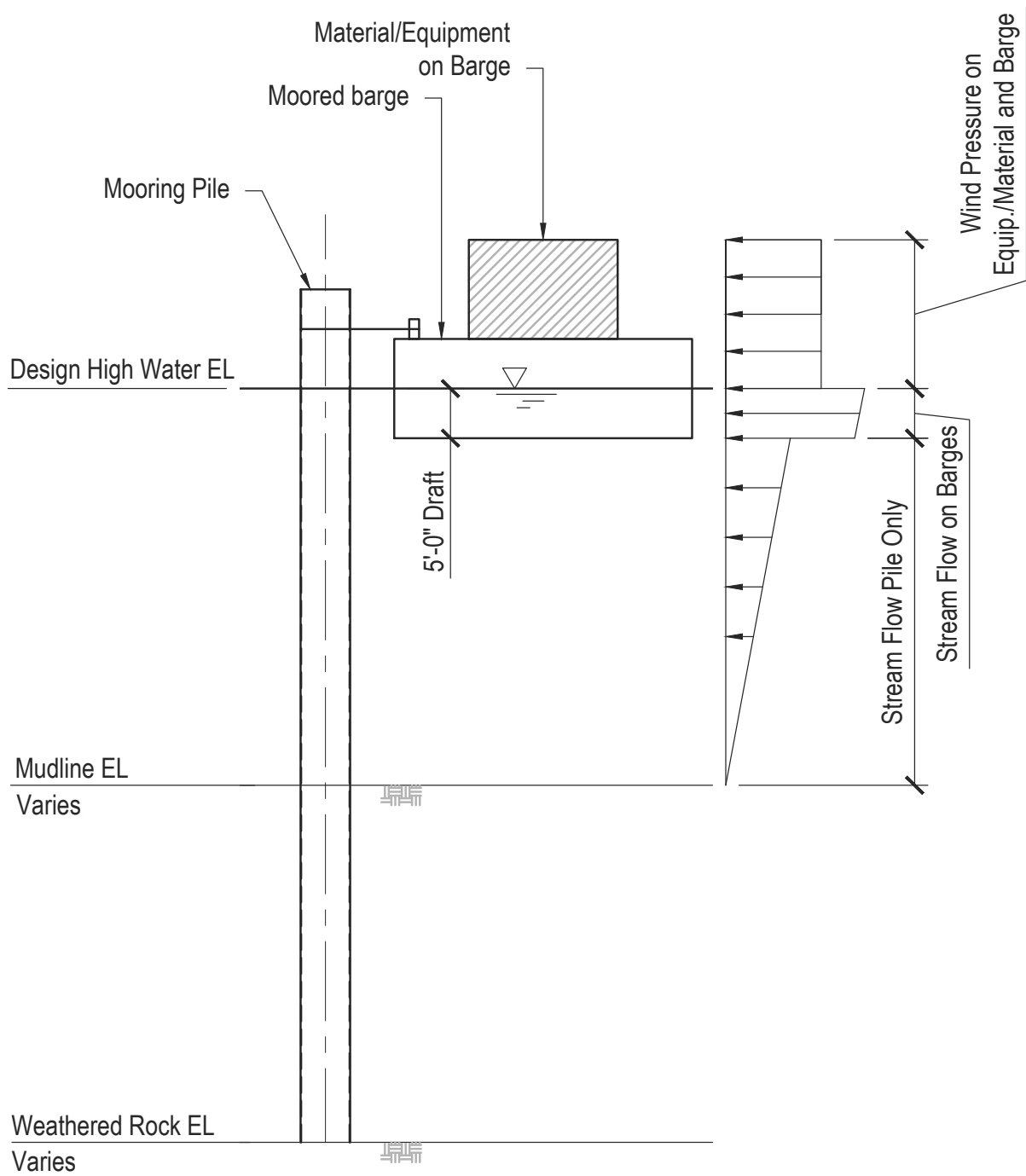


Overall Access Exhibit Plan.dwg Plot Date: 2/19/2026 4:16 PM Plot Scale: 1:300



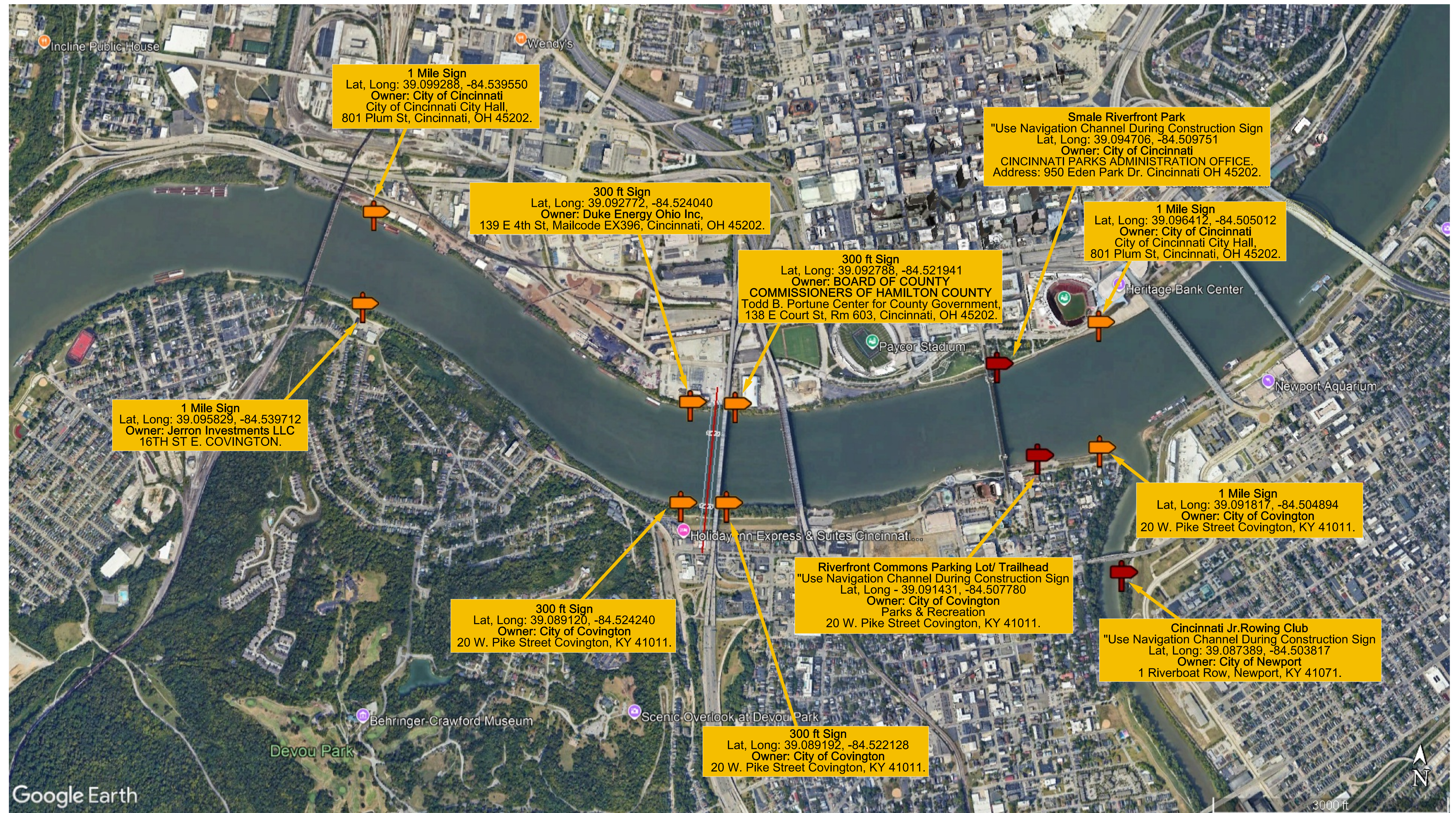
**Brent Spence Bridge Corridor Project
Overall Access Concept Plan**

EXHIBIT 2: Typical Barge Mooring Piling Detail



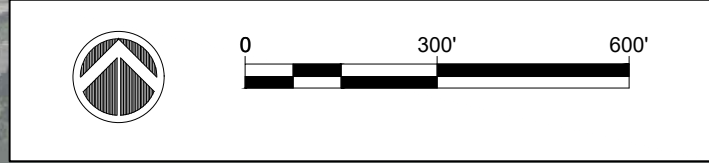
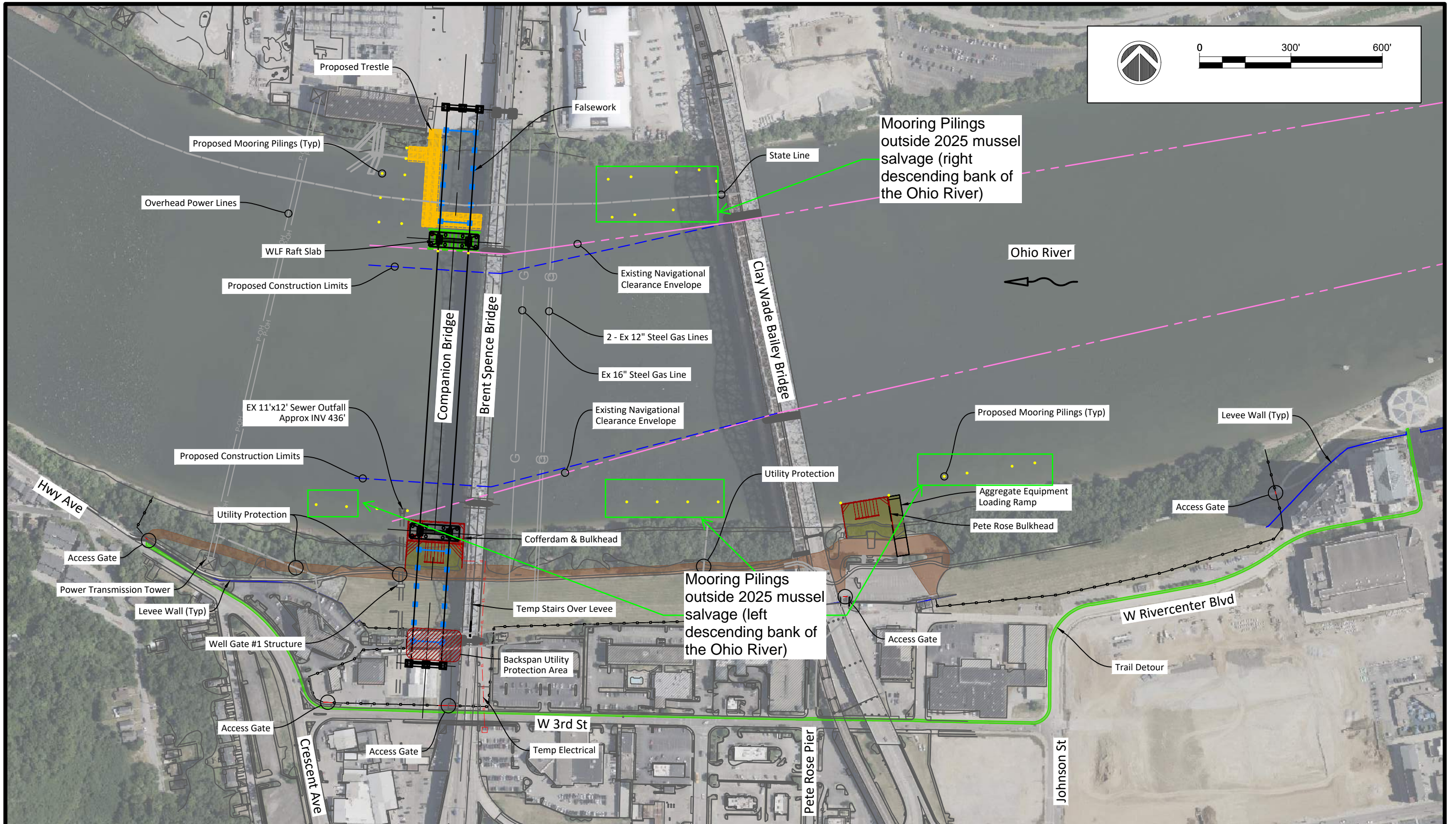
MOORING PILE LOADING

EXHIBIT 3: Ohio River Navigation Advanced Notification Signage



	REVISION	DATE		PREPARED BY DATE: 04/01/2026 DESIGNED BY: J. BURNS CHECKED BY: B. CHUNG DETAILED BY: S. SONGER B. CHUNG	ENVIRONMENTAL COMMITMENT 40 RECREATION & CONSTRUCTION SIGNS CROSSING OHIO RIVER	ROUTE	ITEM NO.	COUNTY OF
						I-75	6-17	KENTON
							SHEET NO.	DRAWING NUMBER
							S015XX	29083

EXHIBIT 4: Barge Mooring Pilings Outside 2025 Mussel Salvage Areas



Overall Access Exhibit Plan.dwg Plot Date: 2/19/2026 4:16 PM Plot Scale: 1:300



**Brent Spence Bridge Corridor Project
Overall Access Concept Plan**



Attachment 2: Kentucky Section 106 Consultation

Becky Rude

From: Baughman, Pamela <pamela.baughman@dot.gov>
Sent: Wednesday, May 6, 2026 12:07 PM
To: Becky Rude; Schneider, Erica; Jason.Watkins@dot.ohio.gov
Cc: Toni, Melissa (FHWA); Lowry, Sara (FHWA); Robinson, Camille (FHWA)
Subject: Fwd: Section 106 Consultation - Brent Spence Bridge Corridor Project

Categories: Reference

External Email: Use caution when clicking on links, replying, or opening attachments.

Please see below regarding a reply from the Shawnee Tribe for BSBCP.

Thanks,
Pam



Pamela Baughman
Environmental Program Manager
FHWA Ohio Division
U.S. Department of Transportation
(614) 280-6835 (office)
pamela.baughman@dot.gov

----- Forwarded message -----

From: Laserfiche Notification <donotreply@laserfiche.com>
Date: Wed, May 6, 2026 at 12:21 PM
Subject: Section 106 Consultation - Brent Spence Bridge Corridor Project
To: <pamela.baughman@dot.gov>

This email is in response to Brent Spence Bridge Corridor Project.

The Shawnee Tribe's Tribal Historic Preservation Department has the following response to this project:

The Shawnee Tribe has no issues or concerns at this time. Please continue with the project as planned.

If you have any questions, you may contact me via email at Section106@shawnee-tribe.com

Thank you for giving us the opportunity to comment on this project

Becky Rude

From: Hans, Stacey D (KYTC) <Stacey.hans@ky.gov>
Sent: Thursday, April 23, 2026 8:58 AM
To: Becky Rude
Subject: FW: Section 106 Consultation, Brent Spence Bridge Corridor Project, OH-KY, Update for Re-evaluation #3
Attachments: Absentee-Shawnee_2026 04 22 Tribal Notification BSB Updated Studies - Re-eval 3.pdf

External Email: Use caution when clicking on links, replying, or opening attachments.

From: Baughman, Pamela <pamela.baughman@dot.gov>
Sent: Wednesday, April 22, 2026 5:09 PM
To: 106nagpra@astribe.com
Cc: Jason.Watkins@dot.ohio.gov; Erica.Schneider@dot.ohio.gov; Hans, Stacey D (KYTC) <Stacey.hans@ky.gov>; Shields, Carl R (KYTC) <Carl.Shields@ky.gov>; Givan, Shundreka (FHWA) <shundreka.givan@dot.gov>; Robinson Camille (FHWA) <Camille.Robinson@dot.gov>; Lowry, Sara (FHWA) <sara.lowry@dot.gov>; Snyder, David (FHWA) <david.snyder@dot.gov>
Subject: Section 106 Consultation, Brent Spence Bridge Corridor Project, OH-KY, Update for Re-evaluation #3

****CAUTION** PDF attachments may contain links to malicious sites. Please contact the COT Service Desk ServiceCorrespondence@ky.gov for any assistance.**

Good afternoon,

The Federal Highway Administration (FHWA), Kentucky and Ohio Divisions, would like to continue consultation for the proposed Brent Spence Bridge Corridor project carrying Interstates 71 & 75 over the Ohio River, an undertaking subject to Section 106 of the National Historic Preservation Act (NHPA), as amended, and implementing regulations at 36 CFR Part 800: Protection of Historic Properties.

In previous consultation, FHWA provided updated studies completed to support the 2024 SEA/FONSI, as well as notification of the preparation and subsequent execution of a Section 106 project-specific Programmatic Agreement (PA). As part of this re-evaluation, additional updated studies have been completed and are summarized for each state in the attached correspondence.

Please see attached correspondence for more information, in addition to the attached enclosures. FHWA is also providing a link for access to studies completed relating to cultural resources for further detail and reference; this link to access reports will be provided in a separate transmittal following this email. If you have any trouble accessing this link, please let us know.

FHWA invites you to review the enclosed documentation and provide any comments, questions, or concerns on the updated studies for the re-evaluation. **We respectfully request a response by May 13, 2026; however, should you need more time to review and respond, please let us know.**

Please contact us or ODOT with any questions, requests for additional information, or any views you may wish to share on the project and its potential to affect properties of religious and cultural significance to your tribe. As the contact for tribal consultation at the FHWA Ohio Division, my contact information is provided below. The ODOT Tribal Liaison is Jason Watkins, who can be reached at Jason.watkins@dot.ohio.gov or (614) 466-5105.

Thanks,

Pam



Pamela Baughman
Environmental Program Manager
FHWA Ohio Division
U.S. Department of Transportation
(614) 280-6835 (office)
pamela.baughman@dot.gov



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

Ohio Division

April 22, 2026

200 North High Street, Room 328
Columbus, OH 43215
614-280-6896

In Reply Refer To:
HDA-OH

ELECTRONIC CORRESPONDENCE ONLY

Absentee Shawnee Tribe of Oklahoma
2025 S. Gordon Cooper Drive
Shawnee, OK 74801-9381

Subject: Section 106 Consultation, Brent Spence Bridge Corridor, ODOT PID Number: 89068, KYTC Item Number: 6-17, Updates and Changes related to a Third Re-evaluation

Dear Governor Johnson:

The Federal Highway Administration (FHWA), Kentucky and Ohio Divisions, would like to continue consultation for the proposed Brent Spence Bridge Corridor project carrying Interstates 71 & 75 over the Ohio River, an undertaking subject to Section 106 of the National Historic Preservation Act (NHPA), as amended, and implementing regulations at 36 CFR Part 800: Protection of Historic Properties. The Project is located in Kenton County, Kentucky and Hamilton County, Ohio. Attached, please find a map showing the project location and general study area. Additional information on the Project is available on the project website: <https://brentspencebridgecorridor.com/>.

The project was most recently evaluated in a Supplemental Environmental Assessment (SEA) resulting in a May 8, 2024 Finding of No Significant Impact (FONSI) identifying Refined Alternative I (Concept I-W) as the preferred alternative for the BSB Corridor Project. Since 2024, FHWA has completed two re-evaluations of the SEA/FONSI. The first re-evaluation was completed on August 13, 2025, and the second re-evaluation was completed on March 6, 2026. The FHWA, in cooperation with Ohio Department of Transportation (ODOT) and the Kentucky Transportation Cabinet (KYTC), are currently processing a third re-evaluation in accordance with the National Environmental Policy Act (NEPA). This re-evaluation is intended to provide an analysis of potential impacts of refined project activities that were not expressly included in the approved 2024 SEA/FONSI.

In previous consultation, FHWA provided updated studies completed to support the 2024 SEA/FONSI, as well as notification of the preparation and subsequent execution of a Section 106 project-specific Programmatic Agreement (PA). The PA provides for consistent application of the Section 106 process between the two states, includes the previously agreed-upon mitigation measures for the resolution of adverse effects to historic properties in Kentucky and Ohio, and provides stipulations which are environmental commitments for the design-build phase of the project, including avoidance of known above ground historic resources and monitoring in areas with potential for archaeological resources, including during geotechnical boring in the Ohio

River. In addition, provisions are included for post-review and unanticipated discoveries and the treatment of human remains.

As part of this re-evaluation, additional updated studies have been completed and are summarized for each state below. Copies of any reports and coordination related to these studies are being provided for further detail and are linked in the supporting email for this transmittal.

- **Kentucky.** Based on the results of all archaeological survey work within the Kentucky portion of the project, no prehistoric/Native American sites have been documented. As discussed in the SEA/FONSI, two small areas under the parking lot of the Kenton County Government Offices had a pending archaeology evaluation. These areas were considered to contain late 19th century residential deposits associated with a contemporaneous brewery. A stipulation to complete this work was originally provided in the PA and in the project environmental commitments. During the first re-evaluation, the APE in Kentucky was expanded to encompass design and construction method refinements resulting from detailed design progression. Review by KYTC and coordination with the Kentucky State Historic Preservation Office (KY SHPO) resulted in a finding that none of the additional areas have previously recorded sites within or immediately adjacent to the APE and do not retain integrity to warrant additional survey; KY SHPO concurred on April 10, 2025. KYTC also documented that the two areas of pending archaeology evaluation for historic resources did not warrant the further stipulated survey, based on additional research, leading to a more informed understanding of historic disturbances. KY SHPO concurred on May 6, 2025, that the stipulation for the pending evaluation is fulfilled without further evaluation.

As part of this third re-evaluation, the APE has expanded to include additional areas in Kentucky and within the Ohio River based on recent design updates. Six areas are described in the attached correspondence dated March 27, 2026, from KYTC to KY SHPO. KYTC concludes that the areas either do not retain archaeological integrity or have previously been archaeologically surveyed, with investigations not identifying intact buried surfaces or sites. KY SHPO concurred with this finding on April 1, 2026. All referenced previous archaeological survey reports are also provided in the linked attachments.

Lastly, as part of design development, the project team has identified temporary barge mooring locations to be used during the construction of the companion bridge adjacent to the existing Brent Spence Bridge over the Ohio River. These pilings would be located on the right and left banks of the river (see attached mapping and typical section), and each piling will be steel, approximately 6' in diameter, driven directly into the riverbed from barges. It is expected that no drilling or anchoring into rock or filling with concrete or other material will be required with these pilings. No additional archaeological investigation or monitoring is being proposed for these temporary mooring pilings in the Ohio River; however, all project construction will be subject to the stipulations of the PA and environmental commitments related to post-review and unanticipated discoveries and the treatment of human remains.

- **Ohio.** In Ohio, the project lies in industrial/commercial setting through the downtown metropolitan area of the City of Cincinnati. Previous archaeological investigations have

identified heavily modified soils and altered land surfaces throughout the entire project area, a result of multiple waves of commercial and industrial development. An expansion of the APE for a watermain relocation in Ohio during the second re-evaluation resulted in additional consultation with the Ohio State Historic Preservation Office (OH SHPO) regarding potential remnant streetcar lines, brick pavers, stone curbs and sidewalks, masonry sewer lines, and incidental artifacts found in disturbed fill contexts. OH SHPO concurred on October 23, 2025, that these such 19th-20th century infrastructure-related features do not meet the eligibility criteria of an individual or contributing element to a historic property of district and do not require further coordination or documentation. However, for all other deposits or resources that do not fall under the description of common 19th-20th century infrastructure related features, ODOT will follow the post-review unanticipated discoveries plan for Ohio in accordance with the project's PA and environmental commitments in the 2024 SEA/FONSI.

There are no additional changes to the APE in Ohio being considered for this third re-evaluation. However, ODOT may still be required to conduct soil borings during the design phase of the project in the river bottom area and has committed to have those samples reviewed by a geomorphologist/archaeologist for evidence of buried archaeological deposits and/ or undisturbed original landforms. If such situations are identified, an archaeological investigation strategy will be developed and implemented for the horizontal and vertical footprint of the bridge supports and construction work limits. Based on prior consultation, a stipulation to complete this work, as needed, is provided in the PA and an environmental commitment is included in the SEA/FONSI.

The Section 106 PA is also being administratively updated to reflect the updated APE for the overall project, and an updated copy will be submitted to your office for your records once completed. FHWA invites you to review the enclosed documentation and provide any comments, questions, or concerns on the updated studies for the re-evaluation. **We respectfully request a response by May 13, 2026; however, should you need more time to review and respond, please let us know.**

Please contact us or ODOT with any questions, requests for additional information, or any views you may wish to share on the project and its potential to affect properties of religious and cultural significance to your tribe. The contact for tribal consultation at the FHWA Ohio Division is **Environmental Program Manager Pamela Baughman**, who can be reached at pamela.baughman@dot.gov or (614) 280-6835. The ODOT Tribal Liaison is Jason Watkins, who can be reached at Jason.watkins@dot.ohio.gov or (614) 466-5105.

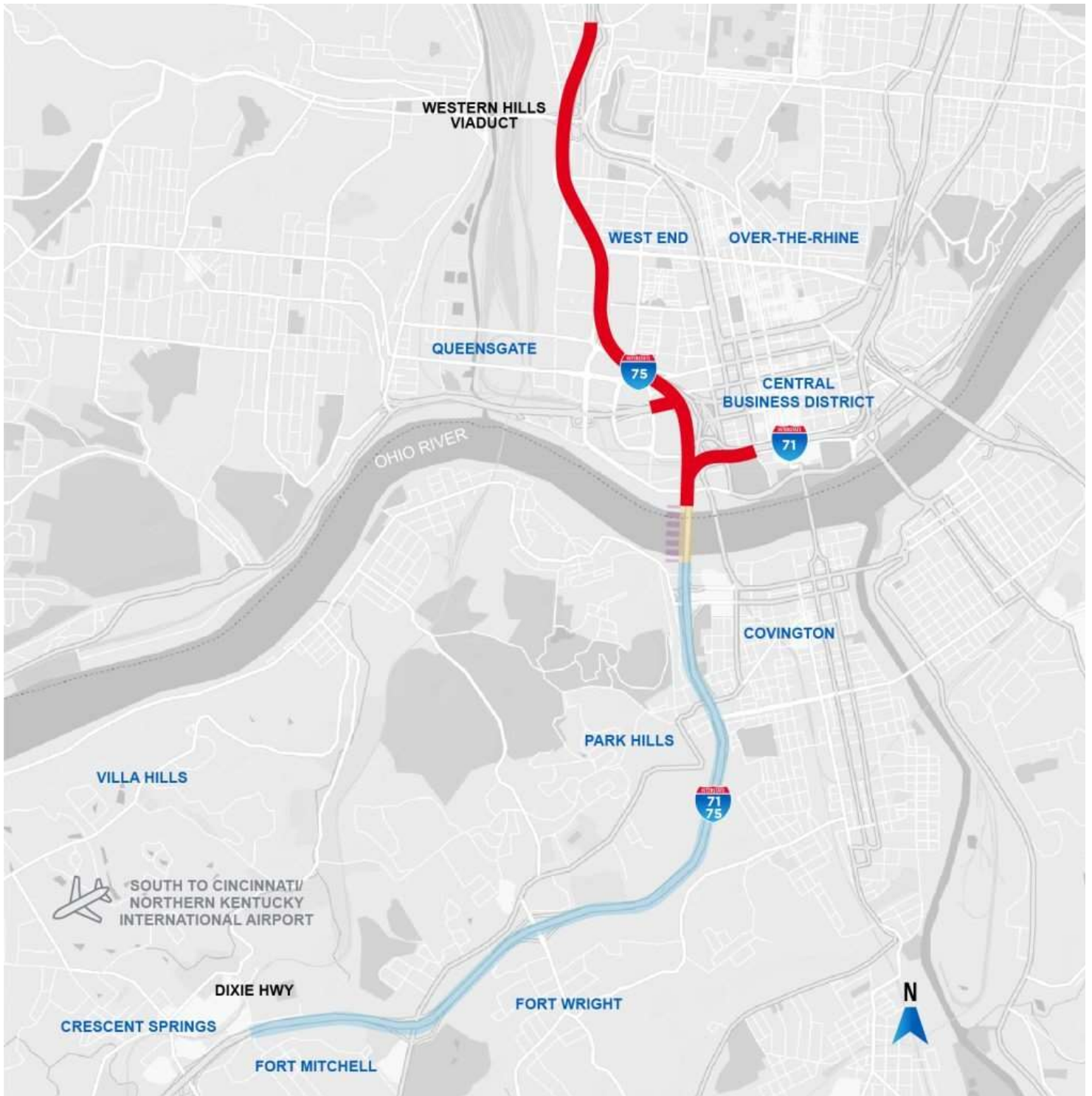
Sincerely,

PAMELA ANNE
JOHNSON
BAUGHMAN

Digitally signed by PAMELA
ANNE JOHNSON
BAUGHMAN
Date: 2026.04.22 16:30:59
-04'00'

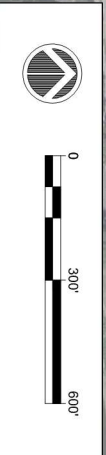
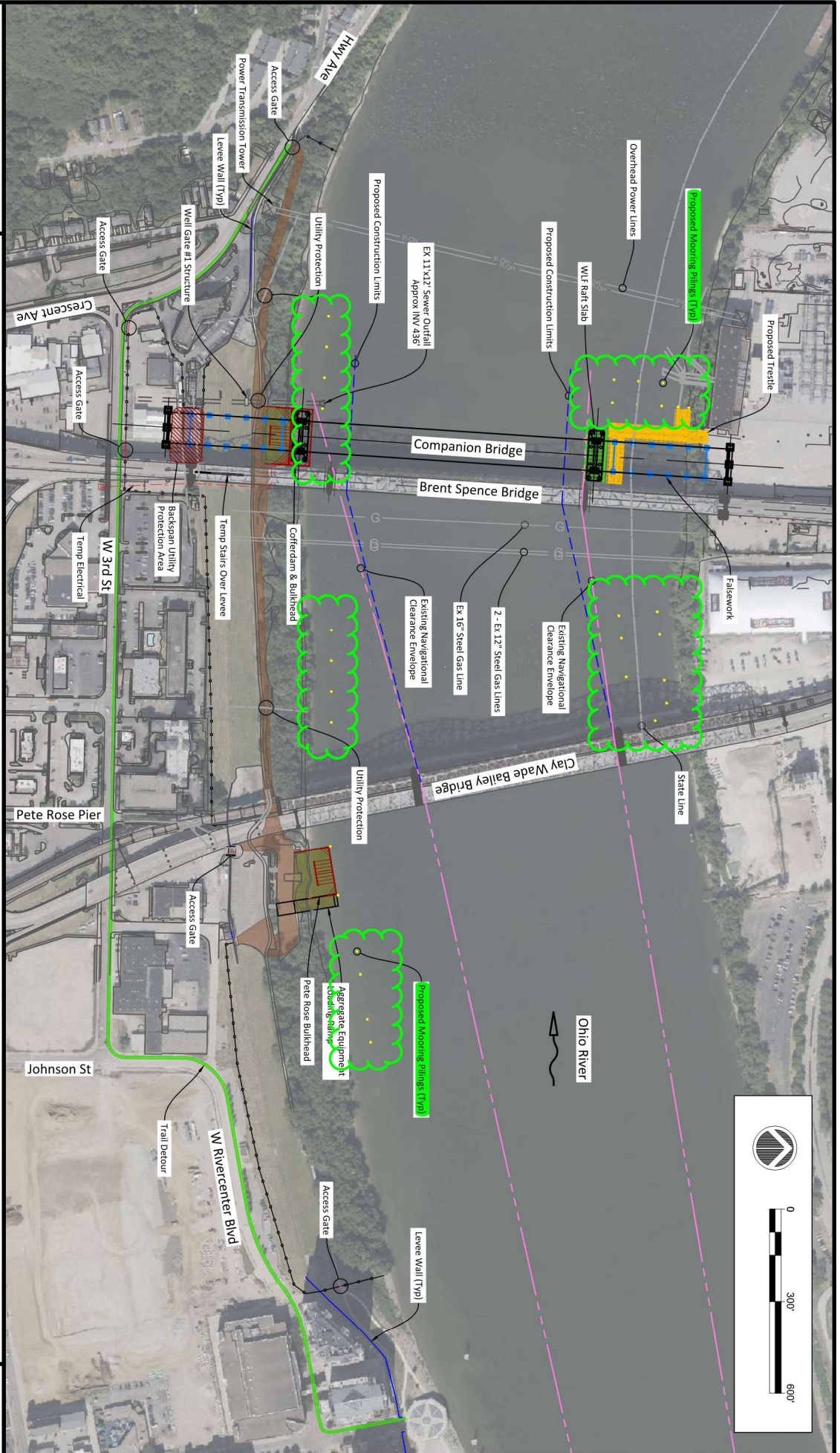
For: David L. Snyder
Division Administrator

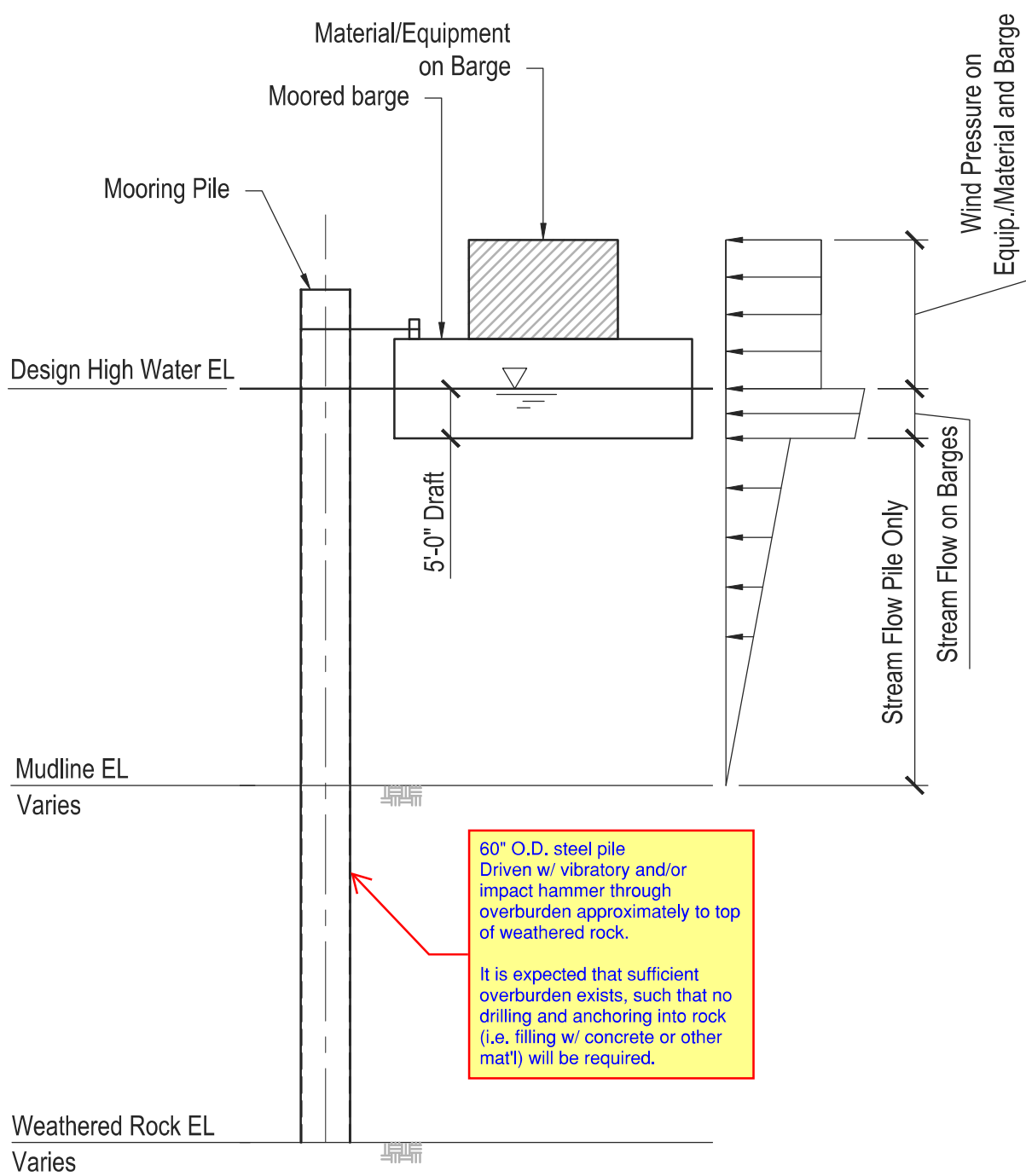
Enclosures





Brent Spence Bridge Corridor Project Overall Access Concept Plan





MOORING PILE LOADING



ANDY BESHEAR
GOVERNOR

TOURISM, ARTS AND HERITAGE CABINET
KENTUCKY HERITAGE COUNCIL
THE STATE HISTORIC PRESERVATION OFFICE

LINDY CASEBIER
SECRETARY

JACQUELINE COLEMAN
LT. GOVERNOR

410 HIGH STREET
FRANKFORT, KENTUCKY 40601
(502) 564-7005
www.heritage.ky.gov

CRAIG A. POTTS
EXECUTIVE DIRECTOR &
STATE HISTORIC PRESERVATION OFFICER

April 1, 2026

Daniel R. Peake, Director
Division of Environmental Analysis
Kentucky Transportation Cabinet
200 Mero Street
Frankfort, Kentucky 40622

RE: Information on six new areas within the Archaeological APE of the Brent Spence Bridge Project
Kenton County, Kentucky
KYTC Item #: 6-17.00

Dear Mr. Peake,

Thank you for your recent digital submission of documentation concerning the above-referenced project. We understand the Federal Highway Administration is the lead federal agency. Recent design updates have added six new areas to the area of potential effect (APE) for the Brent Spence Bridge project in Covington, Kenton County, KY, totaling 36 acres. Area 1-4 involve portions of Crescent Ave, W 3rd, W 4th, and W 5th Streets, and will be subjected to repaving, sidewalk improvements, striping, signage, and in-place replacement of existing utilities. Area 5 is a leveled and eroded slope adjacent to N I-75. Area 6 includes the bank of the Ohio River previously surveyed and cleared by this office in 2015 (KHC# 45436).

Based on previous survey and extensive disturbance by road/commercial construction, erosion, landscaping, and utility installation, KYTC recommends these areas do not retain archaeological integrity and that an archaeological survey is **not warranted**. We concur with this determination.

In the unlikely event that human remains are encountered during construction, all work should cease immediately, and the Kentucky Heritage Council and county coroner should be contacted.



An Equal Opportunity Employer M/F/D

RE: Information on six new areas within the Archaeological APE of the Brent Spence
Bridge Project
Kenton County, Kentucky
KYTC Item #: 6-17

Should you have any questions or concerns, or should plans for this undertaking change, please feel free to contact Ellis Codd of my staff at ellis.codd@ky.gov.

Sincerely,



Craig Potts
Executive Director and
State Historic Preservation Officer

KHC#: 260376

CP: ec

e-cc: Carl Shields (KYTC), Vanessa Hanvey (KYTC)





Andy Beshear
GOVERNOR

TRANSPORTATION CABINET

200 Mero Street
Frankfort, Kentucky 40601

Jim Gray
SECRETARY

March 27, 2026

Mr. Craig Potts
Executive Director and SHPO
410 High Street
Frankfort, KY 40601

SUBJECT: Information on six new areas within the Archaeological APE of the Brent Spence Bridge Project
Kenton County, Kentucky
KYTC Item Number 6-17.00

Dear Mr. Potts,

The Kentucky Transportation Cabinet, on behalf of the Federal Highway Administration is submitting for your staff's review and concurrence information on six (6) new areas identified that fall outside what has been previously coordinated with your office. These were identified following recent design updates on the Brent Spence Bridge project in Kenton County, Kentucky.

Areas 1-4 involve work within the existing right-of-way (ROW), and are associated with repaving, sidewalk improvements, striping, signage, and in-place replacement of existing utilities. Area 5 involves new ROW but does not retain archaeological integrity due to residential landscape modifications and eroded steep slopes. Area 6 involves tree cutting and removal along the Ohio Riverbank. This area received an archaeological survey for the proposed Riverfront Commons Trail in 2015. A series of backhoe trenches did not identify intact buried surfaces and no sites were documented. Four structural features that include two poured concrete wall foundations associated with a coal incline and a possible section of brick street and sidewalk dating to circa 1900 were identified. These structural features lacked significance. Your office concurred with the findings on November 9, 2015. A copy of that 2015 report and SHPO concurrence letter are included.

Based on mapping, aerials, current development and utilities, an examination of historic mapping and recent archaeological documentation for this project, archaeologists within this Division have compiled information to show these areas do not retain integrity and would not warrant a Phase I archaeological survey. This information is included in the attached document that provides mapping, location information and acreage, and the nature of disturbance or the absence of archaeological deposits. This information would typically be provided within a PA2 form, but this project is not considered a small-scale project under the Section 106 Programmatic Agreement.

We ask for your concurrence that these areas do not retain archaeological integrity and that an archaeological survey would not be warranted. Should you have any questions, please contact Carl Shields of my staff at Carl.Shields@ky.gov.

Sincerely,

Daniel R Peake

Daniel R. Peake, Director
Division of Environmental Analysis

DRP/crs

Enclosure

cc: Stacey Hans, Scott Schurman



Andy Beshear
GOVERNOR

TRANSPORTATION CABINET

200 Mero Street
Frankfort, Kentucky 40601

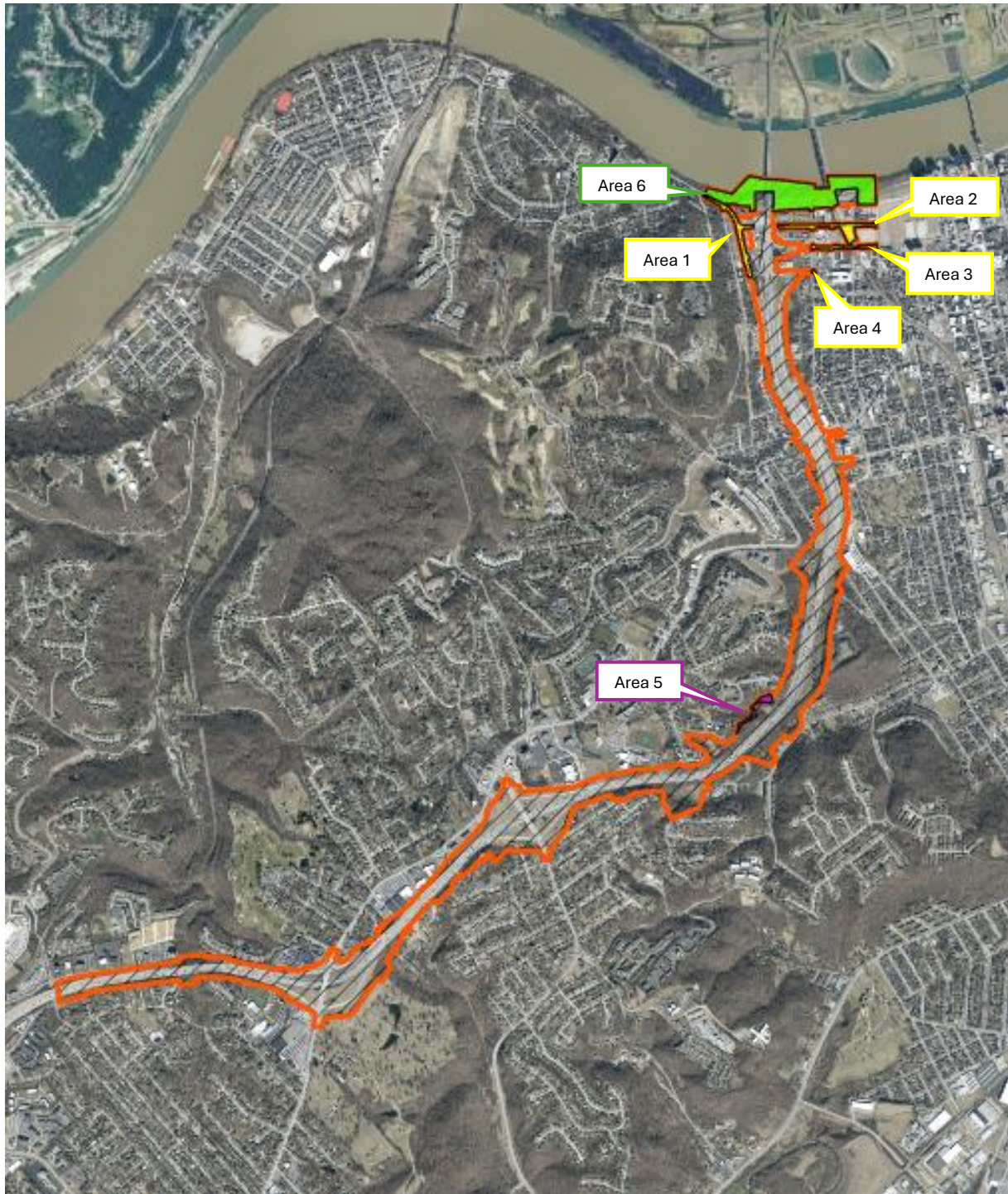
Jim Gray
SECRETARY

Following recent design updates on the Brent Spence Bridge project in Kenton County, Kentucky (6-17.00), six (6) new areas were identified that fall outside what has been previously coordinated with your office. These locations are mostly located across the northern quarter of the project footprint. All locations are shown in the associated mapping. Most of these new areas (Areas 1-4) involve work within the existing right-of-way (ROW), and are associated with repaving, sidewalk improvements, striping, signage, and in-place replacement of existing utilities. One area (Area 5) involves new ROW but does not retain archaeological integrity due to residential landscape modifications and eroded steep slopes. A sixth area (Area 6) involves tree cutting and removal along the Ohio Riverbank. While this sixth area is outside what was previously coordinated, it received an archaeological survey for the proposed Riverfront Commons Trail in 2015. A series of backhoe trenches did not identify intact buried surfaces, no sites were documented, and there were no historic properties affected. SHPO concurred with the findings of the report.

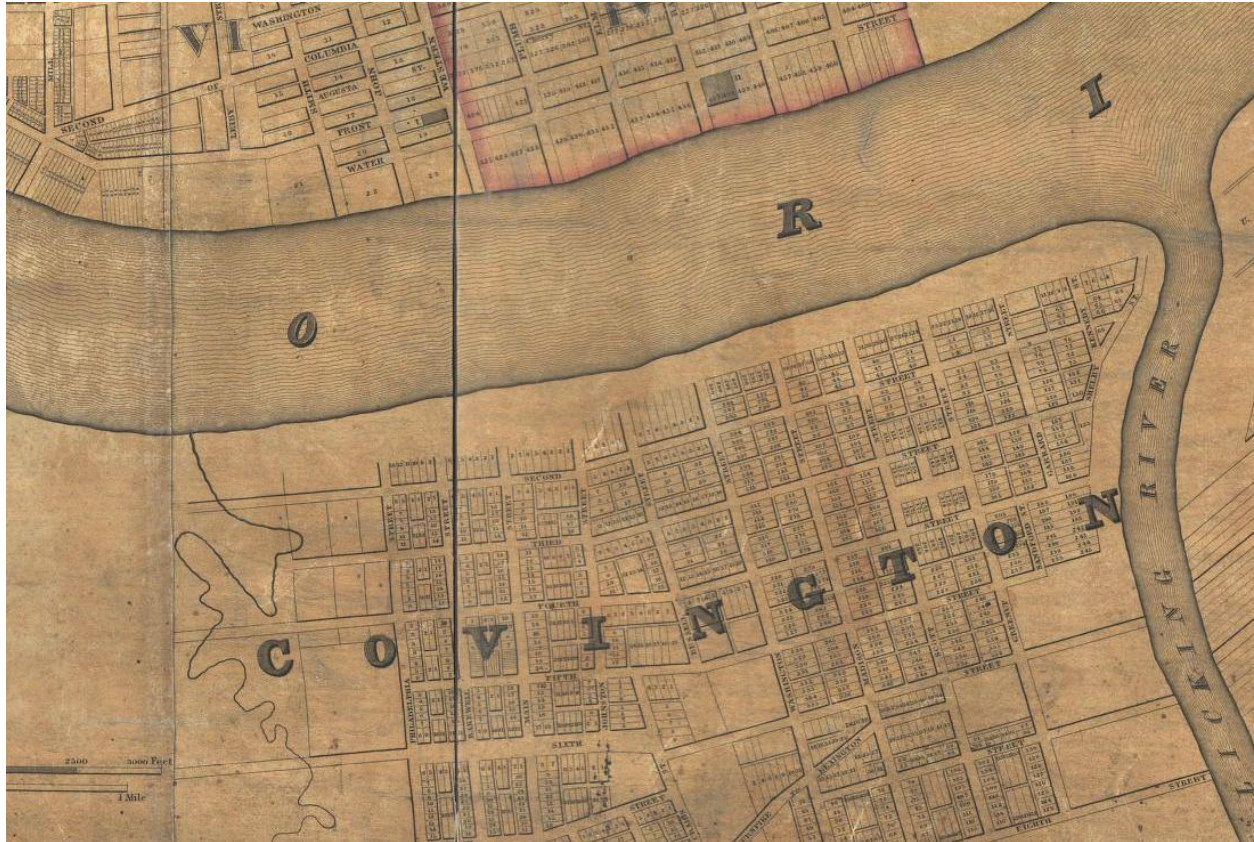
Mapping for the individual locations is provided below, along with the specific location information, acreage, and a description of the setting that indicates why it would not retain archaeological integrity or not require an archaeological survey.

Historic photos, aerials and mapping, Sanborn maps, archived highway plans, and previous archaeological reports for this project were reviewed when considering archaeological potential. None of these locations have previously recorded sites within their footprint.

===



Location of Areas 1-6 within the proposed 6-17 Brent Spence Bridge Project. Shown on a recent aerial image.



1833 Map of Cincinnati. This map shows the early layout of the Covington street grid, which remains mostly unchanged. Note the Willow Run drainage on the left of the map, which is the general location of the current interstate and Brent Spence Bridge.

<https://www.loc.gov/item/2004629233/>



1886 Sanborn map. This map shows the continuation of the Covington street grid, which remains mostly unchanged. Steelworks, a rolling mill, a dry dock, and coal yards are present along the bank and levee of the Ohio River. Note the Willow Run drainage on the left of the map, which is the general location of the current interstate and Brent Spence Bridge.

https://www.loc.gov/item/sanborn03152_001/



1914 USGS topographic map (West Cincinnati, OH). This map shows the continuation of the Covington street grid, which remains mostly unchanged. Note the Willow Run drainage on the left of the map, which is the general location of the current interstate and Brent Spence Bridge.

<https://ngmdb.usgs.gov/topoview/viewer/#18/39.08832/-84.52398>

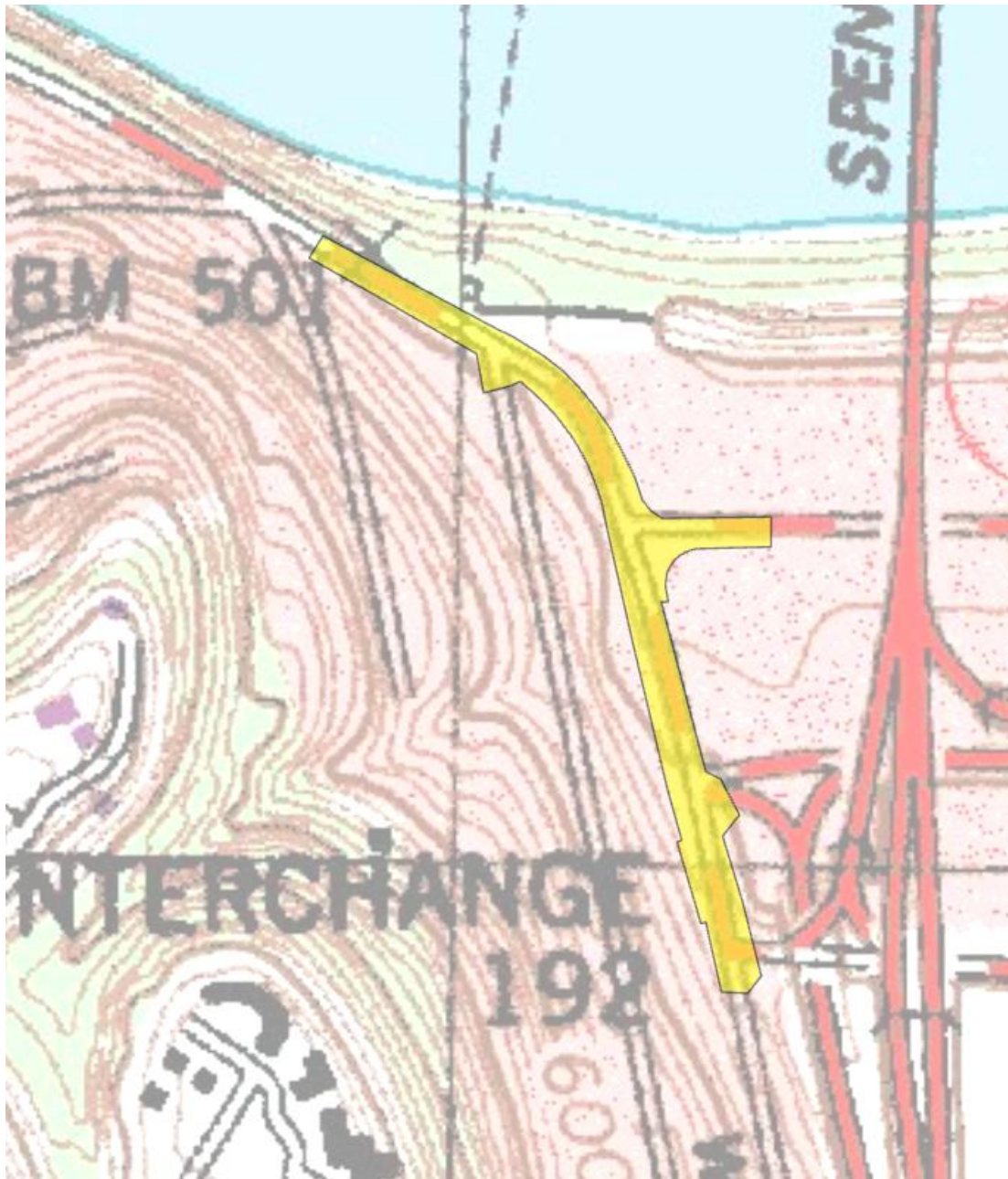


Oblique aerial photo showing construction of the interstate and Brent Spence Bridge, circa 1963. View looking northwest, downstream on the Ohio River. The image shows the Covington street grid, which remains mostly unchanged.

<https://www.nkyviews.com/kenton4/kenton3467.html>

Area 1: 39.087560N 084.524592W; Acres: 3.53

This area is on existing ROW. It includes a portion of Crescent Avenue, and includes tie-ins with West 3rd, 4th, and 5th Streets. Proposed work is associated with repaving, sidewalk improvements, striping, signage, and in-place replacement of existing utilities. The area has been previously disturbed by road construction and improvements, utilities, and commercial development. There are no previously recorded sites within this footprint.



Location of Area 1 on USGS topographic map.



Location of Area 1 on a LiDAR-derived digital elevation model.



Location of Area 1 on a recent aerial image.



View of Crescent Ave. from the south end looking north, near the W. 5th Street intersection.



View of Crescent Ave. from the south looking north, near the W. 4th Street intersection.



View of Crescent Ave. from the south looking north, near the W. 3rd Street intersection.



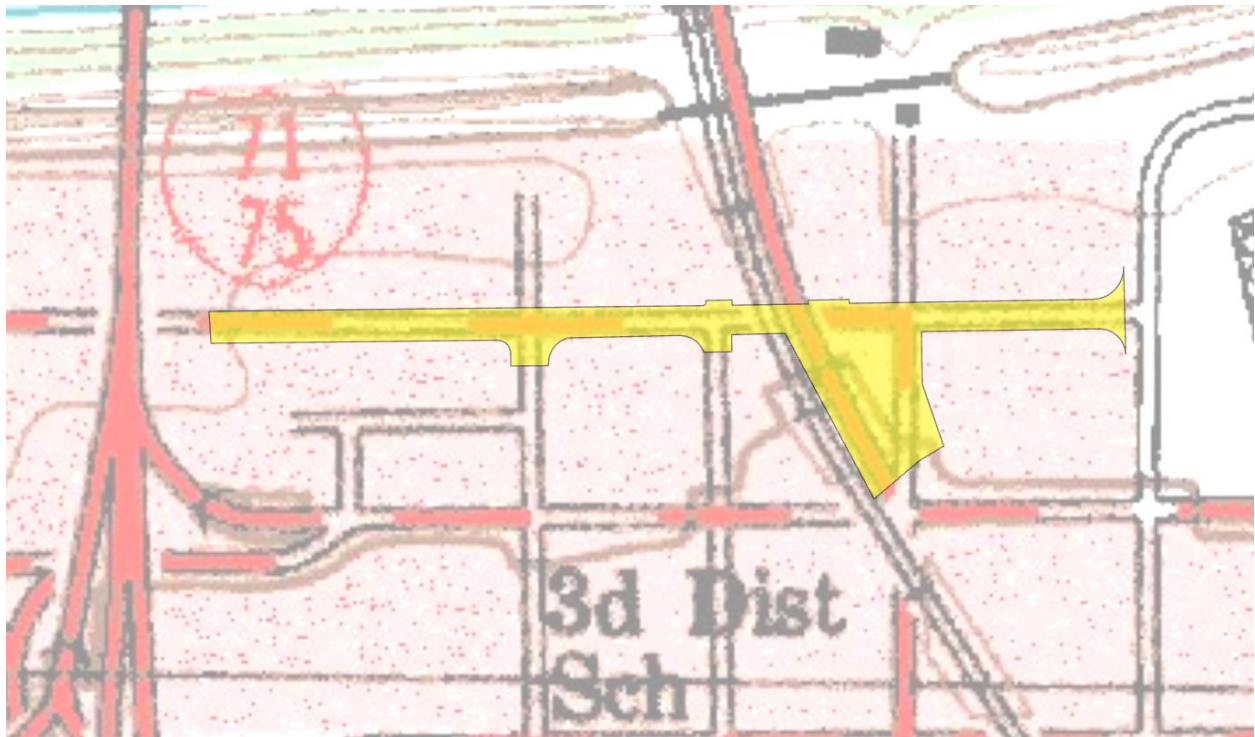
View of Crescent Ave. and W. 3rd Street intersection. Taken from W. 3rd Street looking west.



View of Crescent Ave. from the north end looking east. Note the floodwall on the left.

Area 2: 39.087575N 084.518821W; Acres: 3.91

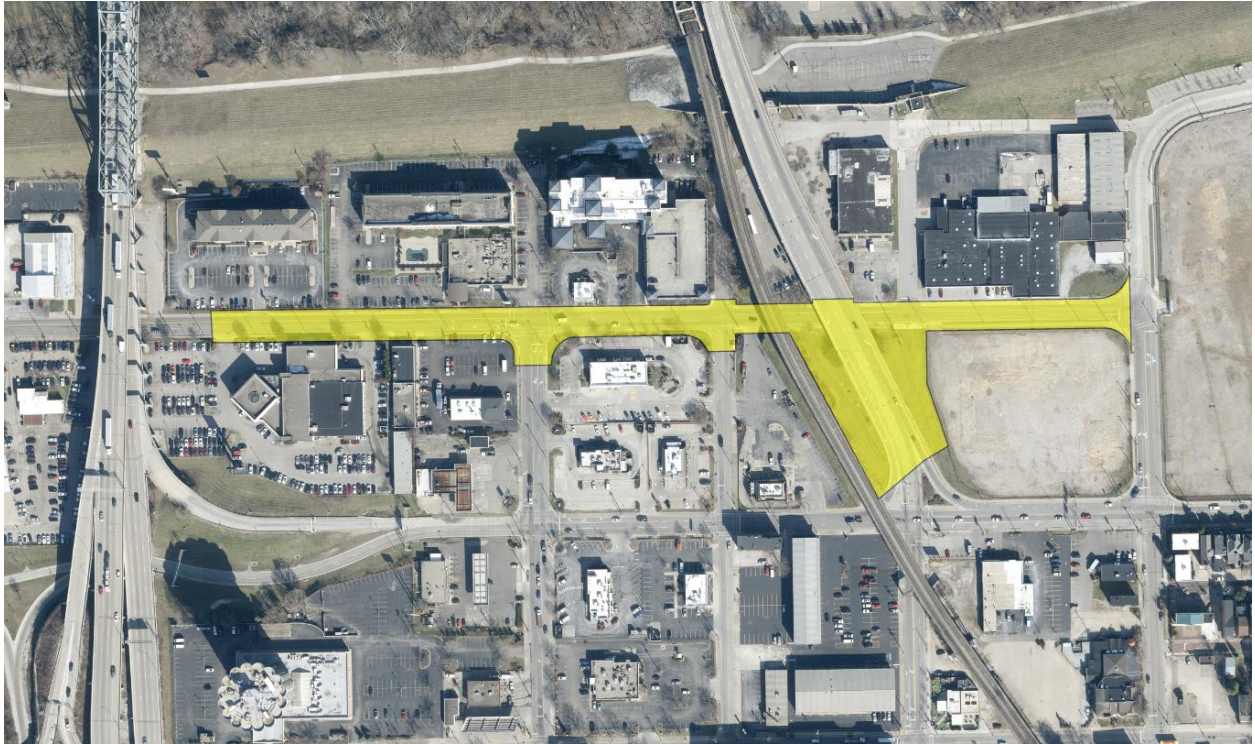
This area is on existing ROW. It includes a portion of West 3rd Street and includes tie-ins with Philadelphia Street, Bakewell Street, and Johnson Street. It also includes the on-ramp/off-ramp to the Clay Wade Bailey Bridge (US 127). Proposed work is associated with repaving, sidewalk improvements, striping, signage, and in-place replacement of existing utilities. The area has been previously disturbed by road construction and improvements, utilities, and commercial development. There are no previously recorded sites within this footprint.



Location of Area 2 on a USGS topographic map.



Location of Area 2 on a LiDAR-derived digital elevation model.



Location of Area 2 on a recent aerial image.



West end of Area 2 looking east on West 3rd Street.



View of West 3rd Street and Philadelphia Street intersection, looking west.



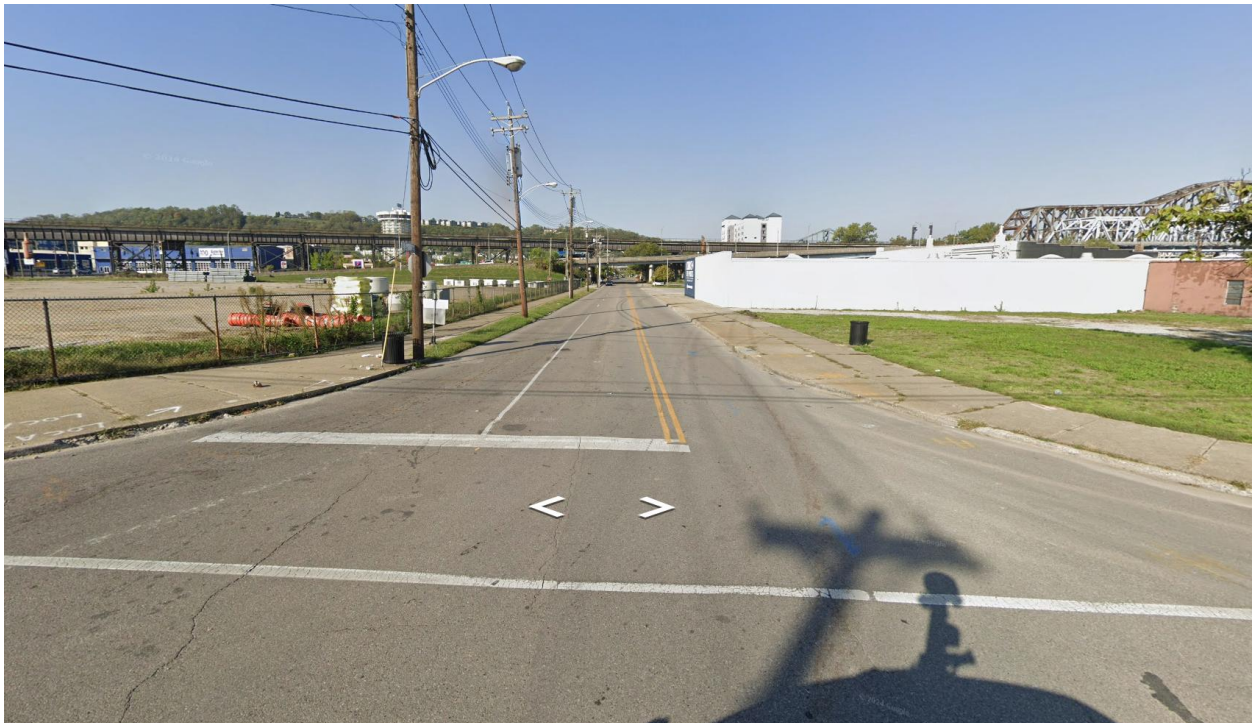
View of the railroad bridge area over West 3rd Street, looking west.



View of the east side of the northbound on-ramp of US 127 to the Clay Wade Bailey Bridge. Looking north.



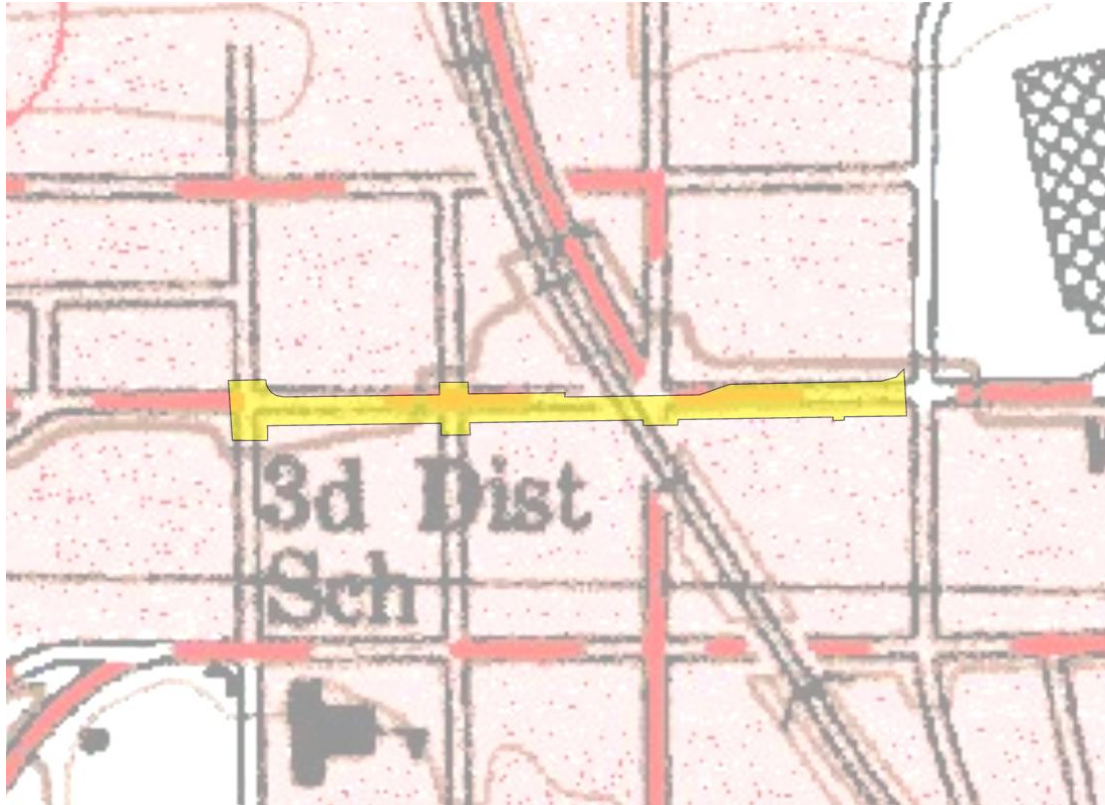
View of the west side of the southbound off-ramp of US 127 from the Clay Wade Bailey Bridge. Looking north. Elevated rail line to the left.



East end of Area 2 looking west from the West 3rd Street/Johnson Street intersection.

Area 3: 39.086513N 084.518272W; Acres: 1.52

This area is on existing ROW. It includes a portion of West 4th Street and includes tie-ins with Philadelphia Street, Bakewell Street, Main, and Johnson Street. Proposed work is associated with repaving, sidewalk improvements, striping, signage, and in-place replacement of existing utilities. The area has been previously disturbed by road construction and improvements, utilities, and commercial development. There are no previously recorded sites within this footprint.



Location of Area 3 on a USGS topographic map.



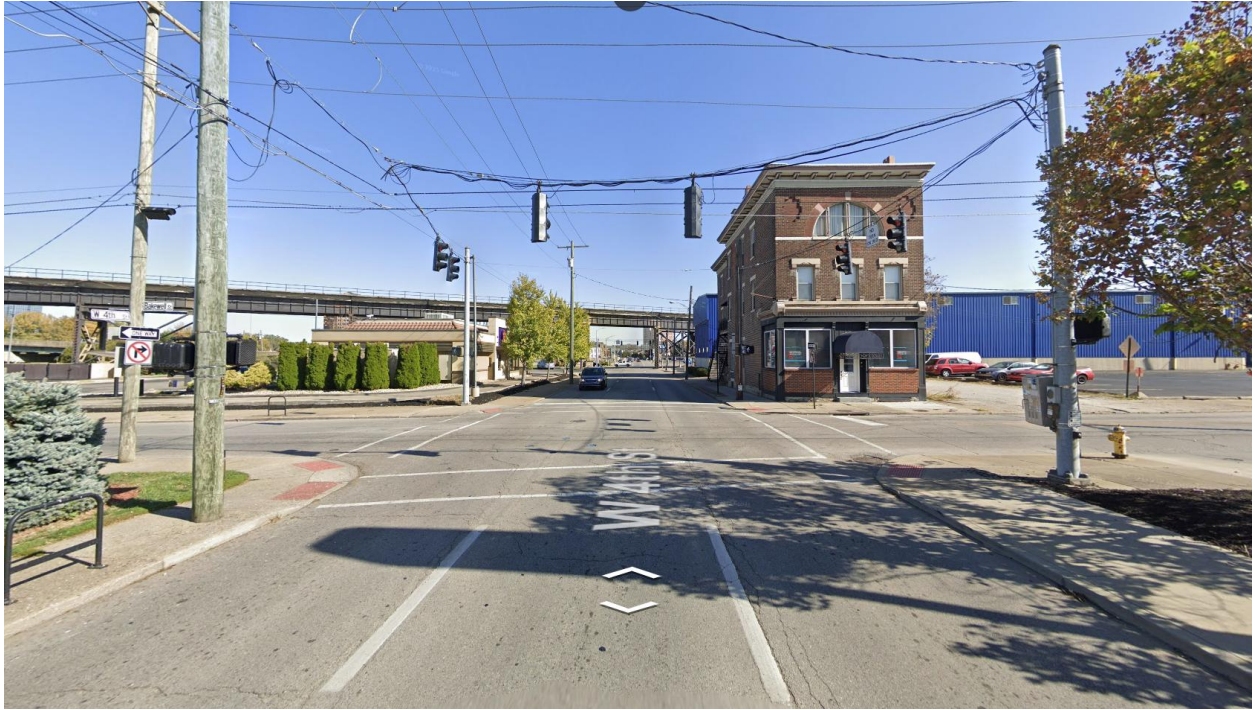
Location of Area 3 on a LiDAR-derived digital elevation model.



Location of Area 3 on a recent aerial image.



West end of Area 3/West 4th Street looking east.



Middle of Area 3 looking east at the West 4th Street/Bakewell Street intersection.



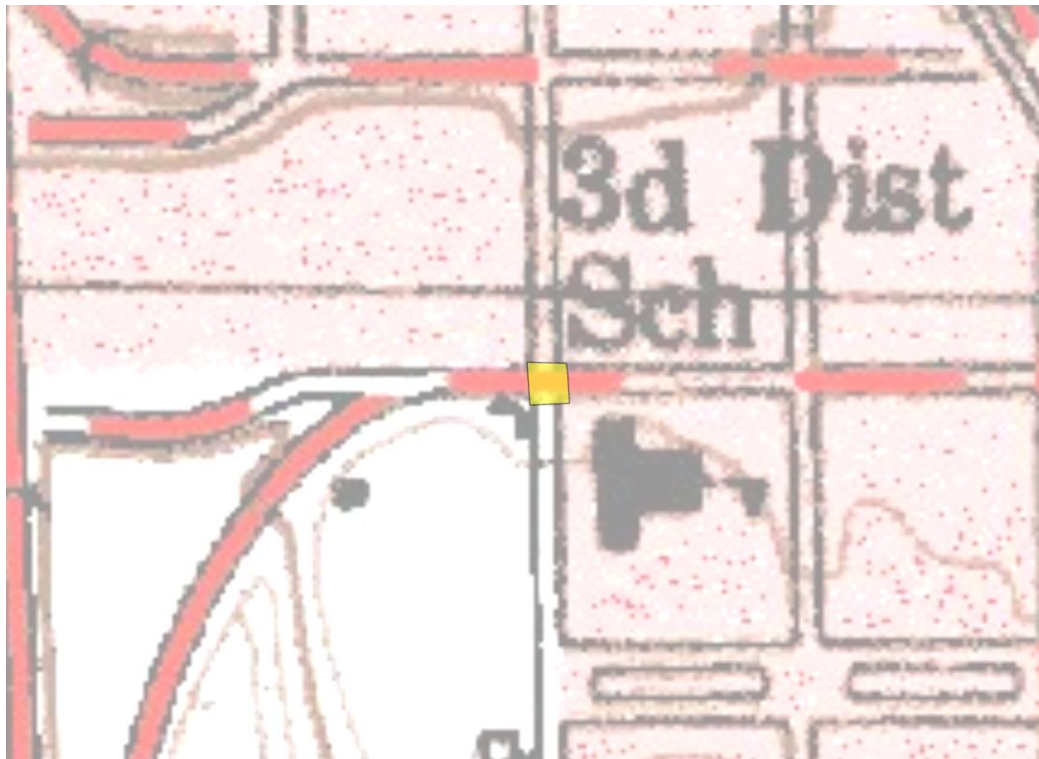
Middle of Area 3 looking east at the Rail overpass and intersection with Main Street.



East end of Area 3 looking west at the West 4th Street/Johnson Street intersection.

Area 4: 39.085381N 084.520042W; Acres: 0.07

This area is on existing ROW. It includes the intersection of West 5th Street and Philadelphia Street. Proposed work is associated with repaving, sidewalk improvements, striping, signage, and in-place replacement of existing utilities. The area has been previously disturbed by road construction and improvements, utilities, and commercial development. There are no previously recorded sites within this footprint.



Location of Area 4 on USGS topographic map.



Location of Area 4 on a LiDAR-derived digital elevation model.



Location of Area 4 on a recent aerial image.



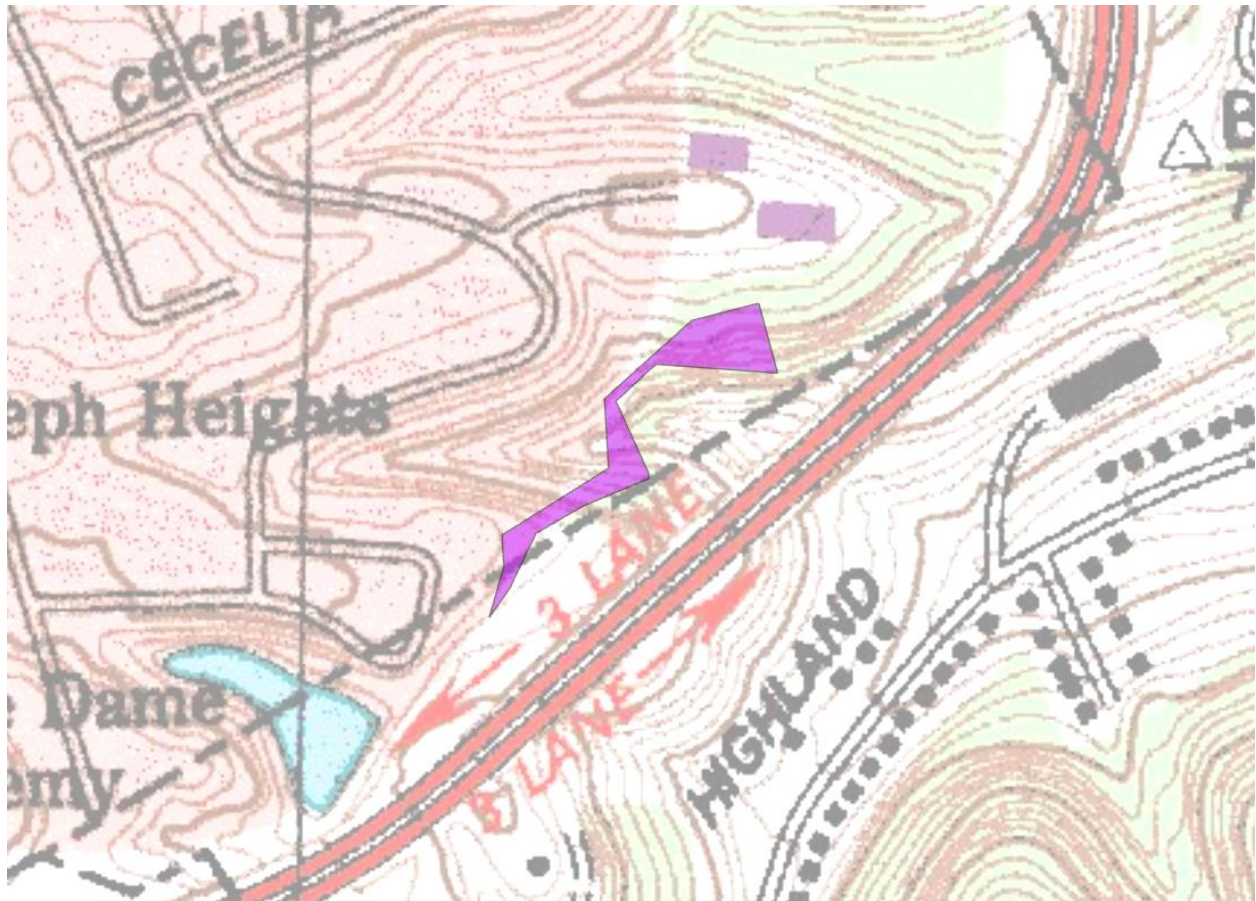
Area 4 looking east at the West 5th Street/Philadelphia Street intersection.



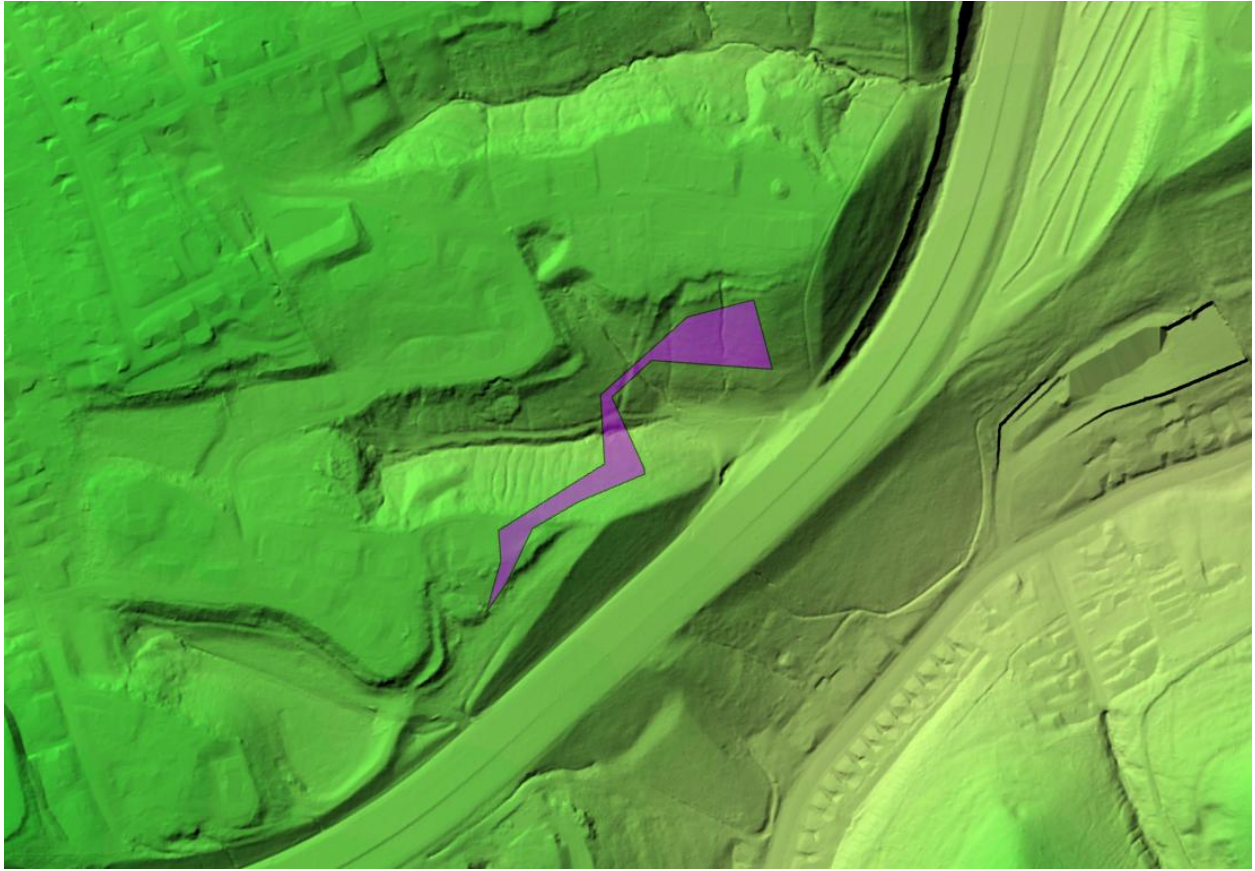
Area 4 looking north at the West 5th Street/Philadelphia Street intersection.

Area 5: 39.063996N 084.524137W; Acres: 1.4

This area is new ROW adjacent to northbound I-75. The upland ridge portion has been disturbed by leveling the landform for residential development. Steep, eroded slopes comprise the remaining areas. The adjacent 2011 archaeological survey shovel probed a nearby level area and conducted pedestrian survey on the slopes. No intact soils or archaeological sites were documented in this area. Though currently wooded, the steep, eroded slopes clearly be seen in LiDAR.



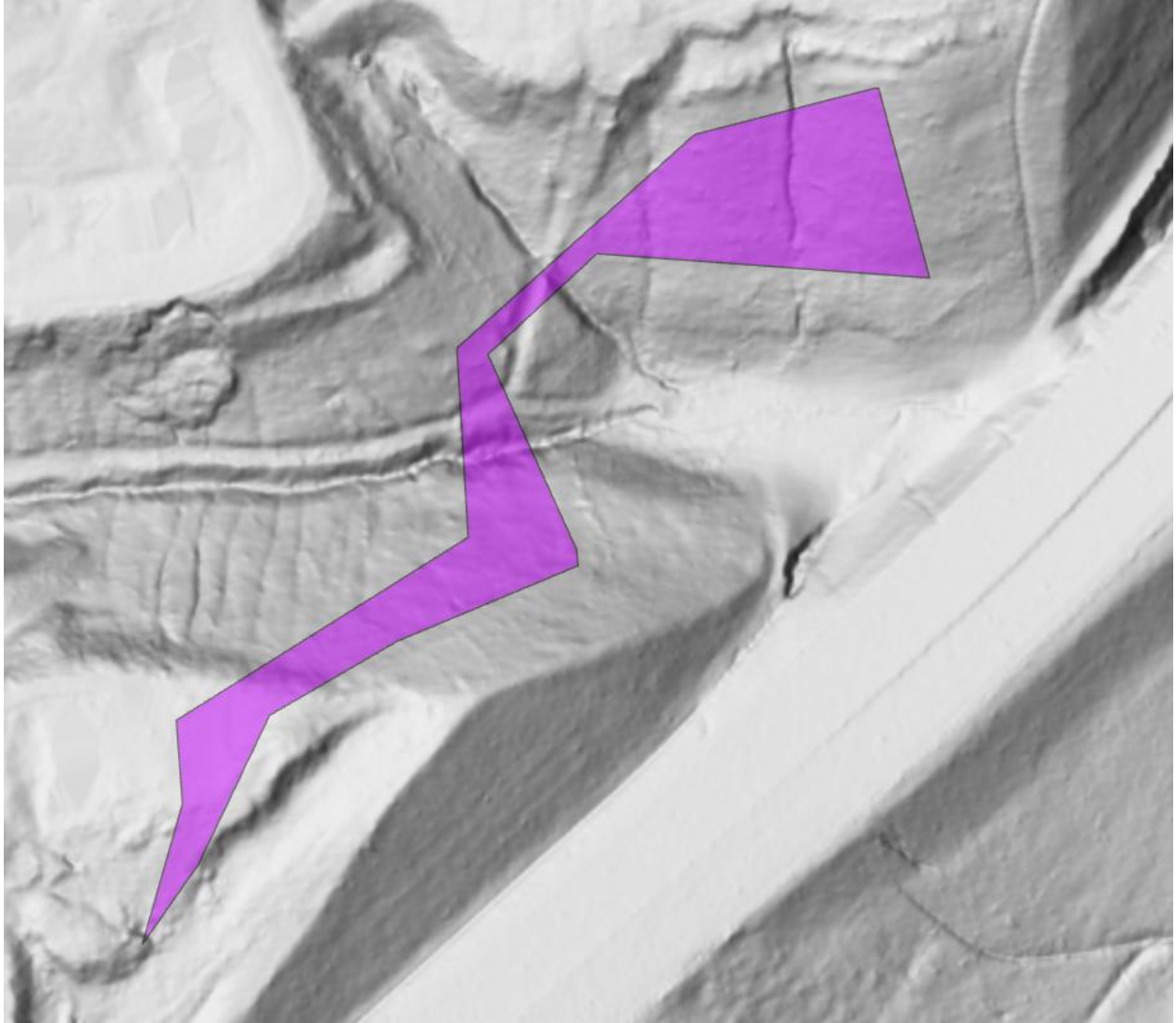
Location of Area 5 on USGS topographic map.



Location of Area 5 on a LiDAR-derived digital elevation model.



Location of Area 5 on a recent aerial image.



Closer view of Area 5 with multidirectional hillshade digital elevation model. This highlights the areas that have been leveled and developed and the areas of eroded step slopes.



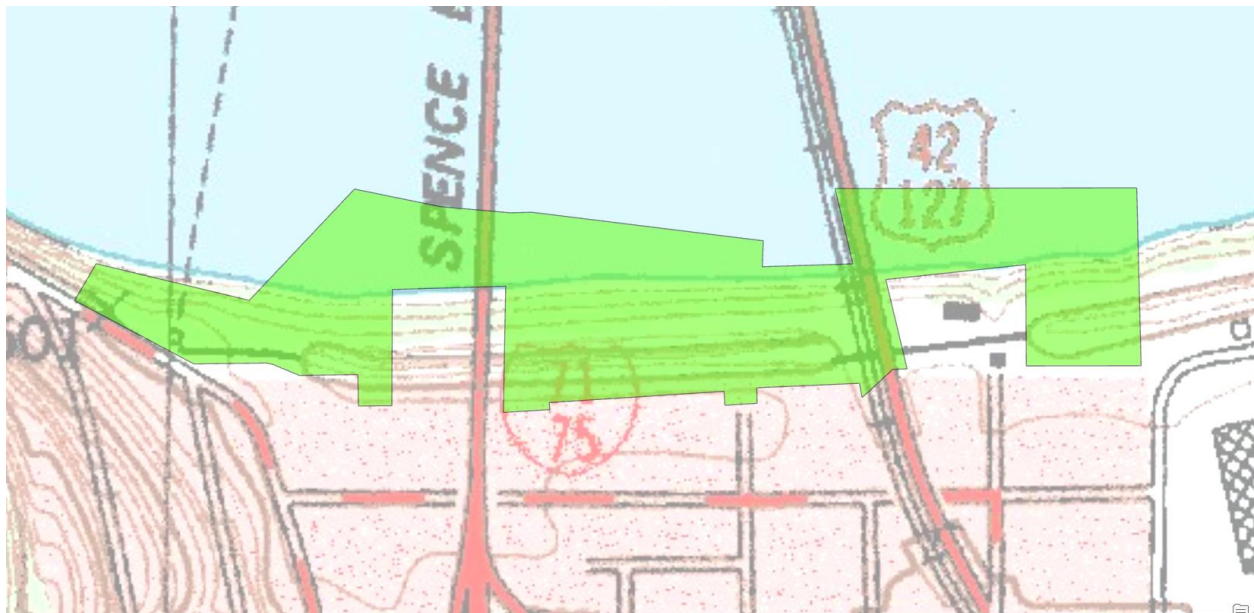
Street view of Area 5, looking west from Interstate 75. Though currently wooded, the steep eroded slopes and leveling of the ridges can clearly be seen in the previous LiDAR images.

Area 6 - 39.089033N 084.520756W; Acres: 25.66

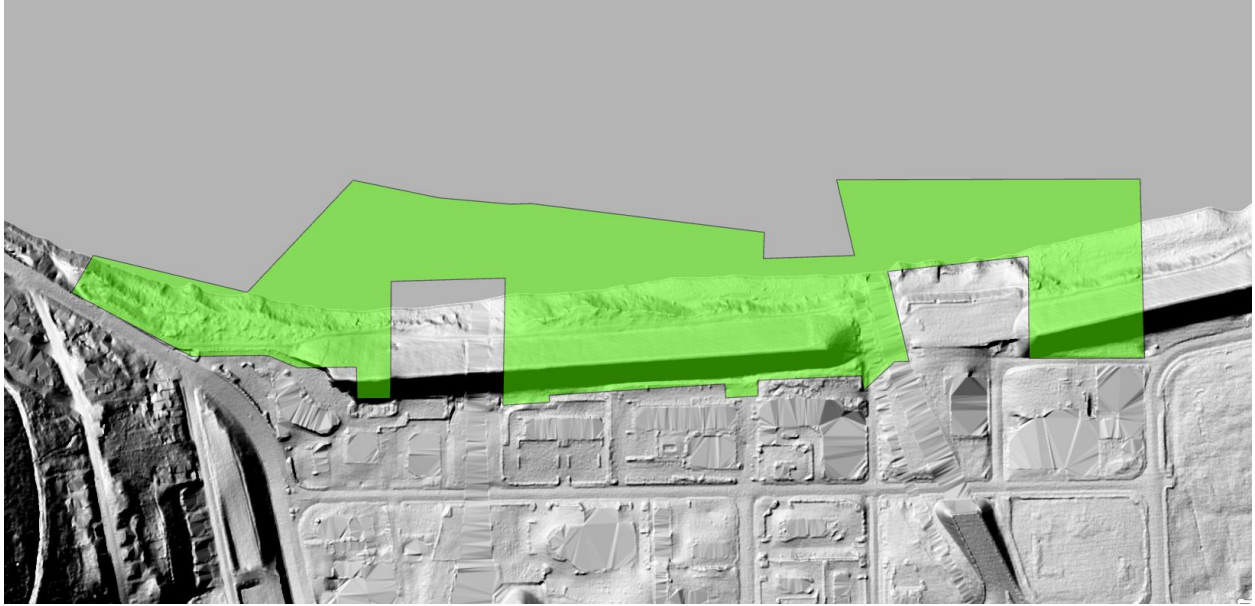
Area 6 includes tree cutting and removal along the Ohio River. While this area is outside what was previously coordinated, it received an archaeological survey for the proposed Riverfront Commons Trail. A series of backhoe trenches did not identify intact buried surfaces and no sites were documented. Four structural features that include two poured concrete wall foundations associated with a coal incline and a possible section of brick street and sidewalk dating to circa 1900 were identified. These structural features lacked significance. The work is documented in “Riverfront Commons Archaeological Survey, KYTC Item Number: 6-421.00, Bellevue, Covington, Ludlow, and Newport, Campbell and Kenton Counties, Kentucky.” The report was authored by Andrew Sewell. The Kentucky SHPO concurred with the findings of the report on November 9, 2015.

A portion of the project extends into the Ohio River. This area identifies the anticipated movement of construction barges. Historically, these areas would have been exposed riverbank, as shown in the 1914 topographic map and 1866 photo. Bathymetric and sonar work for this project confirmed the river bottom in this area consists of scoured and redeposited alluvium and fill.

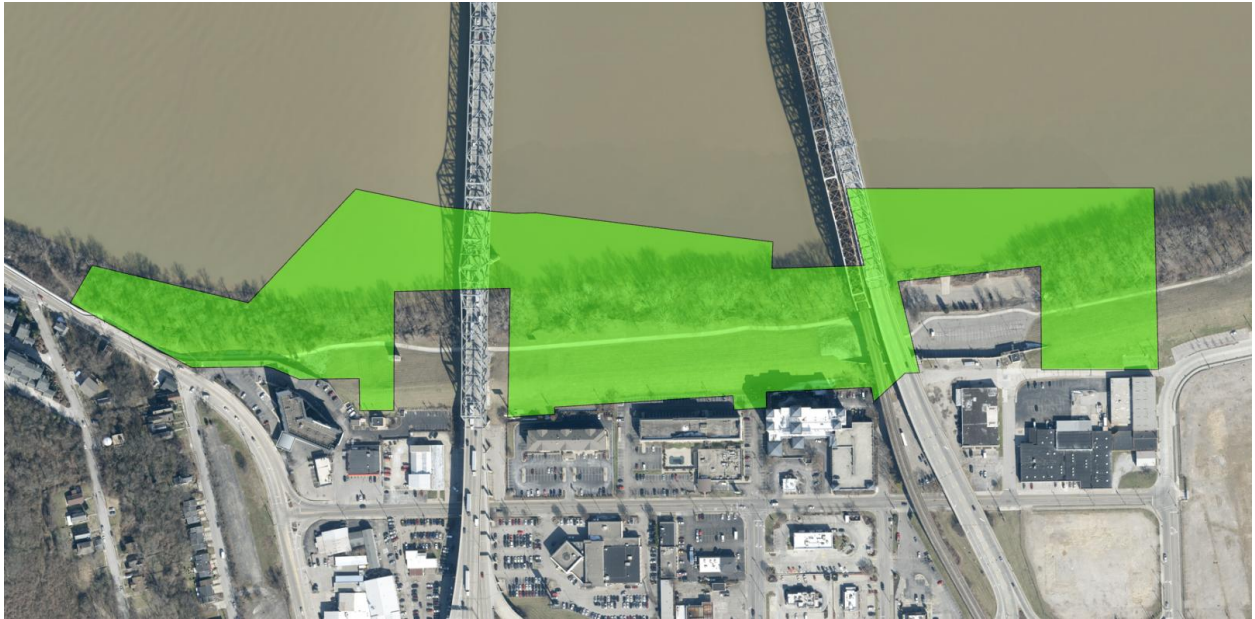
Portions of the Ohio River flood levee are included within Area 6. No ground disturbance of the levee is planned, but because work crews may traverse the surface it is included in the overall project APE.



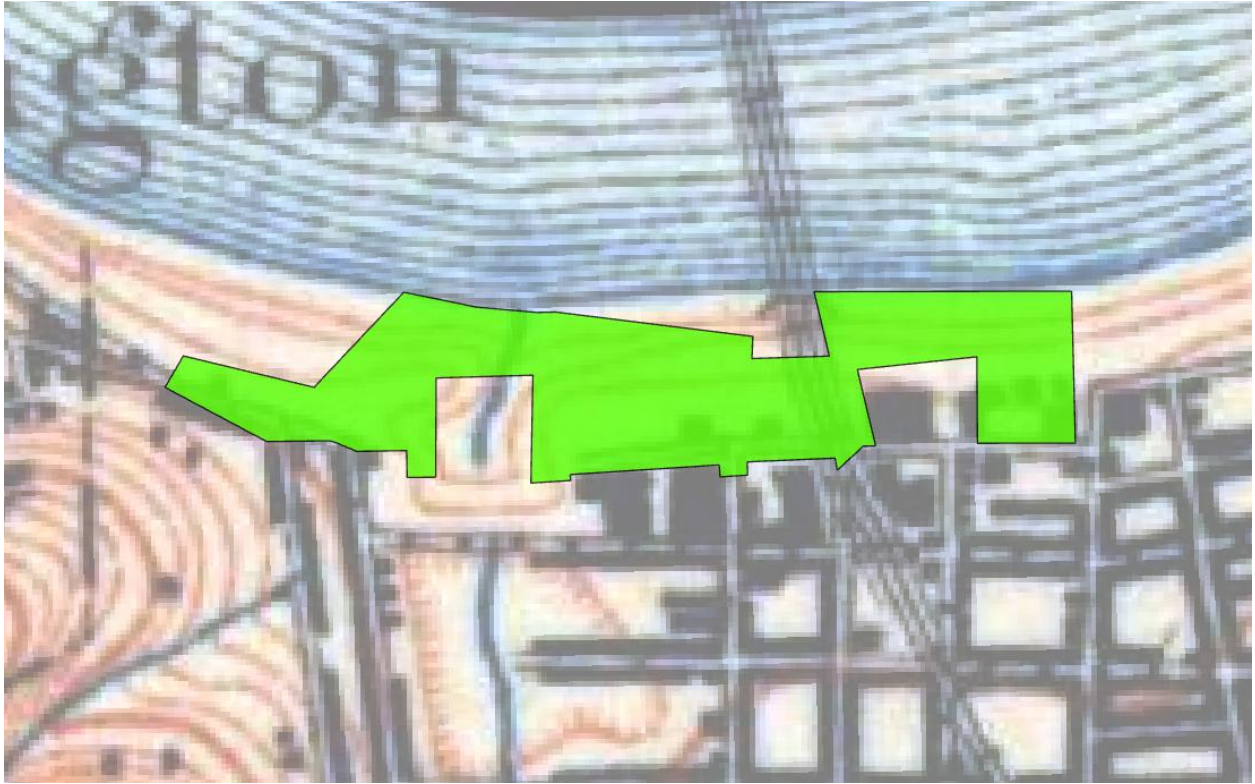
Location of Area 6 on USGS topographic map.



Location of Area 6 on a LiDAR-derived digital elevation model.



Location of Area 6 on a recent aerial image.



Location of Area 6 on a 1914 USGS topographic map.



Oblique aerial image of the eastern portion of the proposed tree cutting area within Areas 6. View looking south. https://explore.kyfromabove.ky.gov/?ll=-84.52186574431407%2C39.08895389811902&zoom=18&image=Bwd_7150_6603



Oblique aerial image of the middle portion of the proposed tree cutting area within Areas 6. View looking south.



Oblique aerial image of the western portion of the proposed tree cutting area within Areas 6. View looking south.



Panoramic image of Covington, Newport, and Cincinnati in 1866. View looking east, upstream on the Ohio River. Note the riverbank activities and disturbance associated with shipping and manufacturing. Willow Run enters the Ohio River in the foreground of this image. <https://www.loc.gov/item/2007662682/>



USGS aerial photo from March 1, 1949. Image shows the construction and associated disturbance of the flood wall. This image was taken prior to the construction of the interstate and related Brent Spence Bridge. <https://earthexplorer.usgs.gov/>



Hadorn Photographers

General image of the construction of Interstate 75 through Covington showing associated disturbance.



Attachment 3: Barge Moorings Regulatory Agency Coordination

- U.S. Coast Guard
- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service
- Ohio Environmental Protection Agency
- Ohio Department of Natural Resources
- Kentucky Division of Water

From: Banik, Will <wbanik@walshgroup.com>
Sent: Friday, April 24, 2026 10:35 AM
To: Dibley, Nathaniel D (Nate) CIV USCG D8 (USA) <Nathaniel.D.Dibley2@uscg.mil>; Banik, Will <wbanik@walshgroup.com>
Cc: Washburn, Eric A CIV USCG D8 (USA) <Eric.Washburn@uscg.mil>; Adrienne Earley <Adrienne.Earley@dot.ohio.gov>
Subject: Re: RE: [EXTERNAL] RE:

Good morning, and my apologies for the delay - our file share system was giving me fits this morning.

Please [use this link](#) to access the same batch of information that was shared with Mr. Washburn last week; the summary table in the email below is still valid and should be helpful. The link should be accessible to anyone and will expire on 29-Apr-2026.

If you have any trouble with the link or questions concerning the contents, please do not hesitate to reach out.

Thank you!

WB



Will Banik | River Crossing Segment Manager

Walsh Kokosing Design Build Team

Brent Spence Bridge Corridor Project

(c) 317.557.9338

wbanik@walshgroup.com

From: Dibley, Nathaniel D (Nate) CIV USCG D8 (USA)
Sent: Friday, April 24, 2026 9:43 AM
To: Banik, Will
Cc: Washburn, Eric A CIV USCG D8 (USA)
Subject: Re: RE: [EXTERNAL] RE:

Good morning,

The link has expired; would you be able to send a new link for us to retrieve the documents? Thanks in advance!

Respectfully,

Nate Dibley

Bridge Management Specialist

Department of Homeland Security

U. S. Coast Guard Heartland District Bridge Office

St. Louis, MO

(office) 314-269-2379

(cell) 757-619-9415

From: Washburn, Eric A CIV USCG D8 (USA) <Eric.Washburn@uscg.mil>
Sent: Thursday, April 23, 2026 3:32 PM
To: Dibley, Nathaniel D (Nate) CIV USCG D8 (USA) <Nathaniel.D.Dibley2@uscg.mil>
Subject: FW: [EXTERNAL] RE:

Brent-spence plan discuss Monday

See if u can get printed fri

From: Banik, Will <wbanik@walshgroup.com>
Sent: Thursday, April 16, 2026 2:34 PM
To: Adrienne.Earley@dot.ohio.gov; Washburn, Eric A CIV USCG D8 (USA) <Eric.Washburn@uscg.mil>
Cc: pamela.baughman@dot.gov; Johnson, Adam (FHWA) <adam.johnson@dot.gov>
Subject: [Non-DoD Source] Re: [EXTERNAL] RE:

Eric -

Please use [this link](#) to access seven files that detail the in-water elements required for construction of the Brent Spence Companion Bridge substructure. The table below summarizes the files and provides a bit of context as to what is contained in each. If there is an alternate means of transmittal or format you wish to see this in, please let me know. Similarly, let me know if you have any issues with the link.

My apologies if the inclusion of the design plans is more than expected. If there is additional information required for review by USCG, please do not hesitate to reach me directly at the contact info below.

File Name	Comments
<i>0_BSB_Companion Bridge_Overall Temp Works & Fndn Plan_20260416</i>	Overall layout of proposed temporary works & new bridge substructure relative to existing infrastructure
<i>0_Walsh_BSB_USCG Exhibit Plans_Nov26 Updates</i>	Navigation channel temporary impacts; major phase breakdown of construction activities and their anticipated impact on navigation channel; updated and re-shared with USCG in Dec 2025 based on feedback rec'd from D Orzechowski in Sep 2025
<i>TW1_COWI-Pete Rose Pier Bulkhead Drawings_R3 022726 S&S</i>	Design plans for Pete Rose Pier Bulkhead - temporary sheet pile structure upstream of Clay Wade Bailey bridge
<i>TW2_COWI-KY Bulkhead and Cofferdam Drawings_R2 040926 S&S</i>	Design plans for sheet pile bulkhead and cofferdam required for construction of Pylon 2 (left descending, in-water pylon)
<i>TW2_COWI-OH River Access Trestle Drawings_R2 040926 S&S</i>	Design plans for OH River Access Trestle - temporary trestle required to support construction of Pylon 3 (right descending, in-water pylon) and Span 3 backspan superstructure
<i>TW3_COWI-OH Pylon 3 WLF Raft Slab Drawings_R0_080825</i>	Design plans for Pylon 3 (right descending, in-water pylon) footing temp works
<i>TW6_COWI-End Span FW Lower Deck Tower Drawings (OHIO ONLY)_RB 071025</i>	Design plans for Span 3/Ohio backspan falsework towers; required to support erection of superstructure (Note, Span 1/Kentucky backspan have similar falsework but are located entirely on land and are omitted from this drawing set)

Thank you for your continued support and coordination as we head into the construction phase of the Brent Spence project,

WB



Will Banik | River Crossing Segment Manager

Walsh Kokosing Design Build Team

Brent Spence Bridge Corridor Project

(c) 317.557.9338

wbanik@walshgroup.com

From: Adrienne.Earley@dot.ohio.gov <Adrienne.Earley@dot.ohio.gov>

Sent: Thursday, April 16, 2026 1:10 PM

To: Banik, Will <wbanik@walshgroup.com>; Washburn, Eric A CIV USCG D8 (USA) <Eric.Washburn@uscg.mil>

Cc: pamela.baughman@dot.gov <pamela.baughman@dot.gov>; Johnson, Adam (FHWA) <adam.johnson@dot.gov>

Subject: RE: [EXTERNAL] RE:

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you are expecting them and know the content is safe.

Thank you, Will.

Adding Pam and Adam in from FHWA so they are in the loop.

Respectfully,

Adrienne Earley, M.S.

Waterway Permits Program Manager

Office of Environmental Services, Division of Planning

1980 West Broad Street, Mail Stop 4170

Columbus, Ohio 43223

D: (614) 466-2159

Adrienne.Earley@dot.ohio.gov



**Department of
Transportation**

From: Banik, Will <wbanik@walshgroup.com>
Sent: Thursday, April 16, 2026 1:09 PM
To: Earley, Adrienne <Adrienne.Earley@dot.ohio.gov>; Washburn, Eric A CIV USCG D8 (USA) <Eric.Washburn@uscg.mil>
Subject: Re: [EXTERNAL] RE:

Thanks, Adrienne - message received.

Eric - I will get you information this afternoon.

Will Banik

317-557-9338

From: Adrienne.Earley@dot.ohio.gov <Adrienne.Earley@dot.ohio.gov>
Sent: Thursday, April 16, 2026 12:48 PM
To: Washburn, Eric A CIV USCG D8 (USA) <Eric.Washburn@uscg.mil>
Cc: Banik, Will <wbanik@walshgroup.com>
Subject: [EXTERNAL] RE:

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you are expecting them and know the content is safe.

Eric,

Adding Will Banik from Walsh to the chain for efficiency.

Will – see below.

Respectfully,

Adrienne Earley, M.S.

Waterway Permits Program Manager

Office of Environmental Services, Division of Planning

1980 West Broad Street, Mail Stop 4170

Columbus, Ohio 43223

D: (614) 466-2159

Adrienne.Earley@dot.ohio.gov



**Department of
Transportation**

From: Washburn, Eric A CIV USCG D8 (USA) <Eric.Washburn@uscg.mil>

Sent: Thursday, April 16, 2026 12:44 PM

To: Earley, Adrienne <Adrienne.Earley@dot.ohio.gov>

Subject:

I spoke with HQ: Nate and HQ are going back and forth on all docs and working your permit.

Can Walsh send me cofferdam and pier const plan for approval?

CAUTION: This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to csc@ohio.gov or click the Phish Alert Button if available.

From: [Latta, Brett C CIV USARMY CELRH \(USA\)](#)
To: [Earley, Adrienne](#); [Andrew M Logsdon](#)
Cc: [Adair, Brandon L CIV USARMY CELRL \(USA\)](#); [Lasoski, David B CIV USARMY CELRL \(USA\)](#); [Kenney, Shawn M CIV USARMY CELRL \(USA\)](#); [Clingan, Peter M CIV USARMY CELRH \(USA\)](#); [Mccoleman, Heather](#); [Scherzinger, James A CIV USARMY CELRL \(USA\)](#)
Subject: RE: Brent Spence Proposed Mooring Pilings
Date: Friday, March 20, 2026 1:43:04 PM
Attachments: [image001.png](#)
[Mooring Pile proposed typ section BSB.pdf](#)

Good afternoon, Adrienne and Andrew:

Thanks for the attached typical plan for the mooring piles. The mooring piles would be Section 10 structures, integral to the bridge work, and thus not regulated by the Corps under Section 10 or Section 404. If you need a formal letter to that effect, please advise.

Please keep the USCG informed of the pile locations as well as the USACE Louisville Navigation Team, Chief, Mr. Shawn Kenney, to make sure any potential impacts to navigation are adequately addressed. Mr. Kenney is copied here.

Thank you,
Brett

From: Earley, Adrienne <Adrienne.Earley@dot.ohio.gov>
Sent: Thursday, March 19, 2026 5:46 PM
To: Latta, Brett C CIV USARMY CELRH (USA) <Brett.C.Latta@usace.army.mil>
Cc: Andrew M Logsdon <andrew.logsdon@ky.gov>
Subject: [Non-DoD Source] Brent Spence Proposed Mooring Pilings

Good evening Brett,
WKDBT has provided the attached typical plan for mooring piles with adjacent barge. They anticipate that there is sufficient overburden at the site which would allow us to embed open-ended steel pilings (~60" in diameter), i.e. not requiring any drilling or fill material inside the piles (concrete, gravel, or otherwise).

Let us your thoughts on whether the piles would be considered regulated fill. We are happy to provide any further justification in support of a non-regulated fill if you would like. We are available to chat more about it also.

Thanks Brett!

Respectfully,

Adrienne Earley, M.S.

Waterway Permits Program Manager

Office of Environmental Services, Division of Planning
1980 West Broad Street, Mail Stop 4170
Columbus, Ohio 43223
D: (614) 466-2159
Adrienne.Earley@dot.ohio.gov



**Department of
Transportation**

CAUTION: This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to csc@ohio.gov or click the Phish Alert Button if available.

Becky Rude

From: Logsdon, Andrew M (KYTC) <Andrew.Logsdon@ky.gov>
Sent: Monday, March 9, 2026 7:51 AM
To: KentuckyES, FW4; Phil_DeGarmo@fws.gov; Fagin, Taylor L
Cc: Chitwood, Makayla E (KYTC); Matt.Raymond@dot.ohio.gov; Megan.Michael@dot.ohio.gov; Adrienne Earley; Click, Nathan (KYTC)
Subject: Brent Spence Bridge Corridor Project-Barge Mooring Location Coordination to address mussels
Attachments: 6-17 Brent Spence Corridor Project USFWS coordination March 2026.pdf; Brent Spence Bridge Corridor Overall Access Plan.pdf

USFWS-KY Field Office,

The Walsh-Kokosing Design Build Team (WKDBT) has identified barge mooring locations that will be used to facilitate the construction of the companion bridge adjacent to the existing Brent Spence Bridge over the Ohio River. Several of these pilings occur in areas of the river not covered in the 2025 mussel salvage efforts. The attached Section 7 coordination letter (and exhibit) addresses these additional areas and discusses the potential impacts to mussels. Please let me know if you have any questions or require more information.

Respectfully,

Andrew Logsdon

KYTC Environmental Analysis
(502) 782-5021



Andy Beshear
GOVERNOR

TRANSPORTATION CABINET

200 Mero Street
Frankfort, Kentucky 406 01

Jim Gray
SECRETARY

March 6, 2026

Josh Lillpop
U.S. Fish and Wildlife Service
J.C. Watts Federal Building
330 W. Broadway
Frankfort, KY 40601

Subject: Freshwater Mussel Occurrence and Potential Impacts at Proposed 2026 Barge Piling Locations – Brent Spence Bridge Project, Cincinnati, Ohio
Kenton County, Kentucky
KYTC Item # 06-17.00

The Walsh-Kokosing Design Build Team (WKDBT) has been contracted to complete the proposed Brent Spence Bridge Corridor (BSBC) Project. This project includes the construction of a companion bridge over the Ohio River which will carry future I-71 and I-75 interstate traffic between Cincinnati, Ohio and Covington, Kentucky. On December 15th, 2022, the Federal Highway Administration (FHWA) received concurrence for a biological assessment completed on the original project impacts from the United States Fish and Wildlife Service Kentucky Field Office (USFWS KFO; FWS 2022-0055658). Additional impacts identified by the project team were later coordinated via addendum and concurred with September 19th, 2024 under the same USFWS coordination number.

No federally listed species were collected in the mussel survey coordinated in the biological assessment in 2022. BioSurvey Group conducted a mussel salvage and relocation in project impact areas in fall of 2025, during which 60 live non-listed mussels across 12 species were collected, demonstrating low mussel density within impact areas. Mussel density in the salvage areas was low, suggesting that few mussels, if any, likely occur in these piling direct impact areas.

Recent project updates include the addition of several pilings that were not covered in the 2025 mussel salvage efforts. Pilings 7 – 14 are located on the right descending bank (RDB; Ohio) upstream of the Brent Spence Bridge. Pilings 1 – 4, 20 – 23, and 27 – 28 are located on the left descending bank (LDB; Kentucky) (Attachment A). Each piling will be 1.83 m (6 ft) in diameter and will be driven directly into the riverbed from barges. In total, eight pilings, totaling 21.01 m² of direct impact area, on the RDB and ten pilings, totaling 26.27 m² of direct impact area, on the LDB are outside the 2025 salvage areas.

Based on the 2025 results, estimated mussel density in the RDB salvage area was 0.001 mussel / m². At this density, an estimated 0.02 mussels occur in the proposed piling direct impact areas. Adding a 5-m salvage buffer to each of the eight RDB piling locations would result in a total salvage area of 879.15 m²,

[Type here]

in which approximately 1.01 live mussels would be expected to be recovered during a potential salvage of these areas (Table 1). The area upstream of the bridge, which was surveyed in the 2022 pre-construction mussel survey, consisted of boulder/rubble along the bank, a band of sand and gravel and then woody debris, and few mussels were present. Additionally, a bathymetric survey of the river channel was conducted during the initial mussel survey effort at the bridge. The bathymetric survey indicated that a steep drop-off from the bank to the bottom of the channel occurred along most of the RDB. The pilings upstream of the bridge are in an area that has not been previously surveyed for mussels, but based on the bathymetric survey, the stream channel morphology suggests that the habitat likely does not change significantly upstream of the Brent Spence bridge.

Estimated mussel density in the LDB salvage areas was 0.012 mussel / m². At this density, an estimated 0.31 mussels occur in the proposed piling direct impact areas. Adding a 5-m salvage buffer to each of the ten LDB piling locations would result in a total salvage area of 1,098.93 m², in which approximately 13 live mussels would be expected to be recovered during a potential salvage of these areas (Table 1). According to the initial pre-construction mussel survey, the area upstream of the bridge had a steep drop off, was dominated by sand and, consistent with the salvage area, had very few mussels. This information is most pertinent to eight of the proposed piling locations (1, 2, 3, 4, 20, 21, 22, and 23) on the LDB.

The initial pre-construction mussel survey did identify an area of relatively higher mussel density downstream of the bridge. This area lacked the steep banks present throughout much of the survey area and instead consisted of shallower habitat with deposits of cobble and sand or gravel substrates. While two proposed pilings (27 and 28) are located near this region of more suitable habitat, the piling locations appear to fall within areas of lower density that are more consistent with the data collected during the mussel salvage effort.

Table 1. Estimated Number of Mussels in Brent Spence Bridge Piling Locations.

	RDB (Ohio)	LDB (Kentucky)	Total
No. of Proposed Pilings	8	10	18
Direct Impact Area per Piling (m ²)	2.63	2.63	-
Total Direct Impact Area (m ²)	21.01	26.27	47.28
Estimated 2025 Mussel Density (no. / m ²)	0.001	0.012	-
Estimated No. of Mussels in Direct Impact Area	0.02	0.31	0.33
Salvage Area per Piling (5-m salvage buffer) (m ²)	109.89	109.89	-
Total Salvage Area (m ²)	879.15	1,098.93	1,978.08
Estimated No. of Mussels in Salvage Area	1.01	12.95	13.96

[Type here]

In total, less than one mussel (0.33) is expected to occur in the piling direct impact areas. If salvage and relocation were deemed necessary, and when salvage buffers are applied, approximately 14 mussels may occur in the combined LDB and RDB salvage areas. No federally listed species were detected in the 2022 survey or 2025 salvage effort and are presumed absent from the project action area, therefore it is unlikely that federally listed mussel species will be impacted by the proposed piling installation. These estimates are based on observed densities from the prior salvage efforts in 2025 and reflect the best available information for this specific project.

While the substrate and flow regime of the Ohio River provides suitable habitat for the federally-listed mussel species, none were found during the mussel survey or the more extensive mussel salvage effort undertaken by the project team, which suggests probable absence from the area of direct impact and subsequent buffer areas. With the project's commitment to maintain proper sediment and erosion control measures in place during construction, suitable habitat will likely continue to support mussel species in the future. Given this, a **"may affect, not likely to adversely affect"** determination has been made for all the listed mussel species.

This request is being made pursuant to Section 7 (c) concerning interagency consultation of the Endangered Species Act of 1973 as amended. Our intention is to be in full compliance of the Act. We respectfully request your review and concurrence with our findings for the additional impact areas. If you have any questions or need additional information, please contact Andrew Logsdon or Makayla Chitwood at KYTC-DEA.

Respectfully,

Daniel R Peake

Danny Peake
KYTC-Division of Environmental Analysis
Director

Attachments:

1. Brent Spence Bridge Corridor Project Overall Access Concept Plan - with Pile Locations



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Kentucky Ecological Services Field Office
330 West Broadway, Suite 265
Frankfort, Kentucky 40601
(502) 695-0468

April 8, 2026

Pamela Baughman
Ohio Division Administrator
Federal Highway Administration
200 North High Street, Room 328
Columbus, Ohio 43215

Re: FWS 2022-0055658; Addendum of the Biological Assessment for the Brent Spence Bridge Corridor Project in Kenton County, Kentucky and Hamilton County, Ohio; KYTC Item Number 6-17 and ODOT PID Number 116649

Dear Pamela Baughman:

The U.S. Fish and Wildlife Service's (Service) Kentucky Field Office (KFO) and Ohio Field Office (OHFO) have reviewed the above-referenced project information and request for concurrence received on March 9 2026. The KFO, as the lead Service office for this Endangered Species Act (ESA) consultation, offers the following comments in accordance with ESA of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

Project Description

The Walsh-Kokosing Design Build Team has been contracted to complete the proposed Brent Spence Bridge Corridor Project. This project includes the construction of a companion bridge over the Ohio River which will carry future I-71 and I-75 interstate traffic between Cincinnati, Ohio and Covington, Kentucky. On December 15th, 2022, the Federal Highway Administration (FHWA) received concurrence for a biological assessment completed on the original project impacts from the KFO. Additional impacts identified by the project team were later coordinated via addendum and concurred with September 19th, 2024, under the same USFWS coordination number.

Recent project updates include the addition of several pilings that were not addressed in previous reviews and in a 2025 mussel salvage effort. Pilings 7 – 14 are located on the right descending bank (RDB; Ohio) upstream of the Brent Spence Bridge. Pilings 1 – 4, 20 – 23, and 27 – 28 are located on the left descending bank (LDB; Kentucky). Each piling will be 1.83 m (6 ft) in diameter and will be driven directly into the riverbed from barges. In total, eight pilings, totaling 21.01 m² of direct impact area, on the RDB and ten pilings, totaling 26.27 m² of direct impact area, on the LDB are outside the areas that were previously considered as potential habitat for federally listed mussels.

Federally Listed Species

The FHWA has determined that the proposed action has the potential to affect federally listed mussels that have been addressed in previous coordination's for the proposed action. Service comments regarding the amended action and potential adverse effects of federally listed mussels are provided below.

Federally Listed Mussels

A Service approved mussel survey was conducted by Stantec as part of the original BA between July 16 – August 19, 2022, and encompassed an area of direct impact of approximately 17,500 and 9,800-square meters on the Ohio and Kentucky side of the Ohio River, respectively. The survey resulted in 20 species being identified, none of which were federally listed, which suggests probable absence of federally listed mussels from the project corridor.

On July 18 and 19, 2024 a field reconnaissance team conducted a habitat assessment in additional impact areas as part of a previous amendment. It was determined that the proposed bulkhead is in the same morphological location as the Kentucky side of the Ohio River as the 2022 survey. Based on the results of the 2022 mussel survey and the trend of relatively homogenous substrates from downstream to upstream and the river conditions, it was determined that this amended action was not likely to adversely affect federally listed mussel species.

In the fall of 2025, a mussel salvage and relocation effort were conducted in project impact areas, during which 60 live non-listed mussels across 12 species were collected, demonstrating low mussel density within these impact areas. Mussel density in the 2025 salvage areas was low, suggesting that few mussels, if any, are likely to occur in the current proposed amendment and piling direct impact areas. In total, less than one mussel (0.33) is expected to occur in the piling direct impact areas.

Based upon the 2022 mussel survey results, similarity of habitats searched, and no federally listed mussels identified during the 2025 salvage effort, the Service concurs with FHWA's determination that the proposed amendment "may affect but is not likely to adversely affect" federally listed mussels.


Conclusion

In view of these findings, we believe that the requirements of section 7 of the Endangered Species Act have been fulfilled for this project. Your obligations under section 7 must be reconsidered, however, if: (1) new information reveals that the proposed action may affect listed species in a manner or to an extent not previously considered, (2) the proposed action is subsequently modified to include activities, which were not considered during this consultation, or (3) new species are listed, or critical habitat designated.

If you have any questions regarding the information that we have provided, please contact Phil DeGarmo at (502) 229-8830 or Phil_DeGarmo@fws.gov.

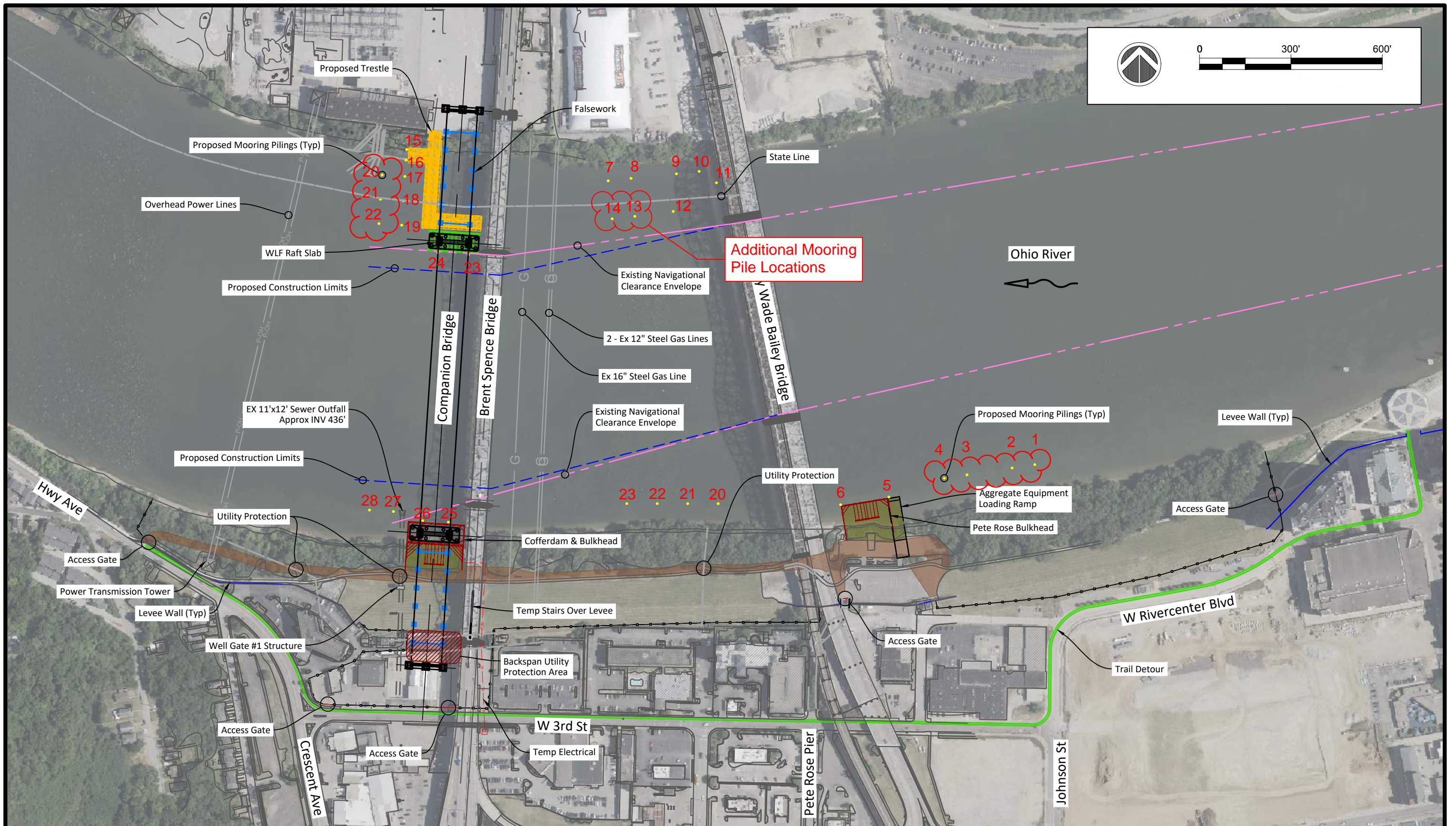
Sincerely,
JOSHUA
LILLPOP

Joshua Lillpop
acting Field Supervisor

 Digitally signed by JOSHUA
LILLPOP
Date: 2026.04.08 15:44:03
-04'00'

cc: Andrew Logsdon, KYTC, Frankfort
Karen Hallberg, USFWS, Columbus

Overall Access Exhibit Plan.dwg Plot Date: 2/19/2026 4:16 PM Plot Scale: 1:300



Brent Spence Bridge Corridor Project Overall Access Concept Plan



Becky Rude

From: Adrienne.Earley@dot.ohio.gov
Sent: Tuesday, April 14, 2026 11:44 AM
To: pamela.baughman@dot.gov; adam.johnson@dot.gov
Cc: Logsdon, Andrew M (KYTC); Becky Rude
Subject: FW: Brent Spence Mooring Pilings
Attachments: Brent Spence_Mooring Pilings location exhibit and typical section.pdf; RE_ Brent Spence Proposed Mooring Pilings, USACE response 3-20-2026.pdf; Brent Spence Bridge information new barge mooring locations ODNR coordination 3-10-26.pdf; Brent Spence Mooring Piles_USFWS response 4-8-26.pdf

External Email: Use caution when clicking on links, replying, or opening attachments.

Coordination with Ohio EPA...

Respectfully,

Adrienne Earley, M.S.

Waterway Permits Program Manager
Office of Environmental Services, Division of Planning
1980 West Broad Street, Mail Stop 4170
Columbus, Ohio 43223
D: (614) 466-2159
Adrienne.Earley@dot.ohio.gov



**Department of
Transportation**

From: Earley, Adrienne
Sent: Friday, April 10, 2026 9:27 AM
To: Glover, James <James.Glover@epa.ohio.gov>; Kamnyev, Anna <Anna.Kamnyev@epa.ohio.gov>; Boyles, Jeffrey <Jeffrey.Boyles@epa.ohio.gov>
Cc: Andrew M Logsdon <andrew.logsdon@ky.gov>; Dunlap, Kathleen <Kathleen.Dunlap@dot.ohio.gov>
Subject: Brent Spence Mooring Pilings

Good morning,

Walsh-Kokosing has identified barge mooring locations that will be used to facilitate the construction of the companion bridge adjacent to the existing Brent Spence Bridge over the Ohio River. Several of these pilings occur in areas of the river not covered in the 2025 mussel salvage efforts, so the BSMT has coordinated with ODNR and USFWS to see if they would require further survey work. Both agencies determined that no additional work is required (see attached responses). We also coordinated with the USACE and they determined that mooring piles are integral to the bridge work, thus not regulated under Section 10 or Section 404 (see attached). I have also attached an exhibit of the mooring locations and a typical section.

The moorings are included in the work plan that has been submitted to the USCG for their review and approval. Unfortunately, we don't have a bridge permit yet, due to ongoing DHS shutdown....they were days away when DHS shutdown. Once the bridge permit is approved, the USCG will then formally review the work plan.

Making sure that we are keeping you in the loop! Please let me know if you have any questions.

Respectfully,

Adrienne Earley, M.S.

Waterway Permits Program Manager
Office of Environmental Services, Division of Planning
1980 West Broad Street, Mail Stop 4170
Columbus, Ohio 43223
D: (614) 466-2159
Adrienne.Earley@dot.ohio.gov




**Department of
Transportation**

From: [Gordon, Jeff](#)
To: [Michael, Megan](#)
Cc: [Maunz, Kyla](#); [Hallberg, Karen I](#); [Korfel, Lindsey M](#); [Raymond, Matthew](#); [Earley, Adrienne](#); [Logsdon, Andrew M \(KYTC\)](#)
Subject: HAM-71/75-0.00/0.22 PID 80968 (Environet PID 75119) Brent Spence Bridge information regarding new barge mooring locations
Date: Tuesday, March 10, 2026 1:56:28 PM
Attachments: [image002.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image001.png](#)

Hi Megan,
Below is the DOW response.

-Jeff

	<p>Jeff Gordon <i>Natural Resources Administrator, ODOT Program</i> Ohio Department of Natural Resources, Office of Real Estate & Land Management 2045 Morse Road, Building E-2 Columbus, Ohio 43229 Office: (614) 265-6397 jeff.gordon@dnr.ohio.gov https://ohiodnr.gov/wps/portal/gov/odnr/discover-and-learn/safety-conservation/about-ODNR/real-estate/environmental-review/</p>
<p><small><i>This message is intended solely for the addressee(s). Should you receive this message by mistake, we would be grateful if you informed us that the message has been sent to you in error. In this case, we also ask that you delete this message and any attachments from your mailbox, and do not forward it or any part of it to anyone else. Thank you for your cooperation and understanding.</i></small></p>	

From: Downs, Kelsea <kelsea.downs@dnr.ohio.gov>
Sent: Tuesday, March 10, 2026 1:53 PM
To: Gordon, Jeff <Jeff.Gordon@dnr.ohio.gov>; Maunz, Kyla <Kyla.Maunz@dnr.ohio.gov>
Cc: Navarro, John <John.Navarro@dnr.ohio.gov>
Subject: RE: HAM-71/75-0.00/0.22 PID 80968 (Environet PID 75119) Brent Spence Bridge information regarding new barge mooring locations

No further mussel work is required for this project.

Kelsea Downs
Aquatic Habitat Biologist
Ohio Division of Wildlife
Phone: 614-273-9332
Email: kelsea.downs@dnr.ohio.gov
wildohio.gov



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Please consider the environment before printing this email.

From: Navarro, John <John.Navarro@dnr.ohio.gov>
Sent: Monday, March 9, 2026 6:18 PM
To: Downs, Kelsea <kelsea.downs@dnr.ohio.gov>
Subject: FW: HAM-71/75-0.00/0.22 PID 80968 (Environet PID 75119) Brent Spence Bridge information regarding new barge mooring locations

Please review and respond

John Navarro

Executive Administrator, Fish Management and Research
Ohio Department of Natural Resources
Division of Wildlife
2045 Morse Rd, Columbus, Ohio 43229
614-265-6346
John.navarro@dnr.ohio.gov

Stop aquatic hitchhikers, trash your unused bait.
Visit stopaquatichitchhikers.org to find out more.

From: Gordon, Jeff <Jeff.Gordon@dnr.ohio.gov>
Sent: Monday, March 9, 2026 10:23 AM
To: Navarro, John <John.Navarro@dnr.ohio.gov>
Cc: Maunz, Kyla <Kyla.Maunz@dnr.ohio.gov>
Subject: HAM-71/75-0.00/0.22 PID 80968 (Environet PID 75119) Brent Spence Bridge information regarding new barge mooring locations

Hi John,

Below is supplemental information and a request for guidance from ODOT regarding the Brent Spence Bridge. Their specific request is highlighted in yellow.

-Jeff

Jeff Gordon



Natural Resources Administrator, ODOT Program
Ohio Department of Natural Resources, Office of Real Estate & Land Management
2045 Morse Road, Building E-2
Columbus, Ohio 43229
Office: (614) 265-6397
jeff.gordon@dnr.ohio.gov
<https://ohiodnr.gov/wps/portal/gov/odnr/discover-and-learn/safety-conservation/about-ODNR/real-estate/environmental-review/>

This message is intended solely for the addressee(s). Should you receive this message by mistake, we would be grateful if you informed us that the message has been sent to you in error. In this case, we also ask that you delete this message and any attachments from your mailbox, and do not forward it or any part of it to anyone else. Thank you for your cooperation and understanding.

From: Michael, Megan <Megan.Michael@dot.ohio.gov>

Sent: Friday, March 6, 2026 2:58 PM

To: Gordon, Jeff <Jeff.Gordon@dnr.ohio.gov>; Maunz, Kyla <Kyla.Maunz@dnr.ohio.gov>; Hallberg, Karen I <Karen_Hallberg@fws.gov>; Korfel, Lindsey M <lindsey_korfel@fws.gov>

Cc: Raymond, Matthew <Matt.Raymond@dot.ohio.gov>; Earley, Adrienne <Adrienne.Earley@dot.ohio.gov>; Logsdon, Andrew M (KYTC) <andrew.logsdon@ky.gov>

Subject: HAM-71/75-0.00/0.22 PID 80968 (Environet PID 75119) Brent Spence Bridge information regarding new barge mooring locations

All,

The Walsh-Kokosing Design Build Team (WKDBT) has identified barge mooring locations that will be used during the construction of the companion bridge adjacent to the existing Brent Spence Bridge over the Ohio River. Several of these pilings were not in areas covered in the 2025 mussel salvage efforts. Pilings 7 – 14 are located on the right descending bank (RDB; Ohio) upstream of the Brent Spence Bridge. Pilings 1 – 4, 20 – 23, and 27 – 28 are located on the left descending bank (LDB; Kentucky) (see attached memo for mapping). Each piling will be 1.83 m (6 ft) in diameter and will be driven directly into the riverbed from barges. In total, eight pilings, totaling 21.01 m² of direct impact area, on the RDB and ten pilings, totaling 26.27 m² of direct impact area, on the LDB are outside the 2025 salvage areas.

A Phase 1/Phase 2 Group 4 mussel survey was performed by Stantec Environmental for this project in 2022 and a mussel salvage survey was conducted by BioSurvey Group in the fall of 2025. In both surveys, most of the mussels found in the survey areas were located downstream from the existing bridge pier closest to the south bank of the river. The results tables of both surveys are included below:

2022 Phase1/Phase 2 all mussels collected:

Table 2. Total Mussel Abundance for All Survey Areas

Common Name	Scientific Name	Live	Fresh Dead	Weathered	Subfossil	Grand Total
Mucket	<i>Actinonaias ligamentina</i>	1				1
Threeridge	<i>Amblema plicata</i>	72				72
Pimpleback	<i>Cyclonaias pustulosa</i>	79				79
Butterfly	<i>Ellipsaria lineolata</i>	3				3
Elephantear*	<i>Elliptio crassidens</i>	1				1
Ebonysell*	<i>Reginaia ebenus</i>	8				8
Wabash Pigtoe	<i>Fusconaia flava</i>	144				144
Plain Pocketbook	<i>Lampsilis cardium</i>	2				2
Fragile Papershell	<i>Leptodea fragilis</i>	3	1			4
Black Sandshell	<i>Ligumia recta</i>	27				27
Washboard*	<i>Megalonaias nervosa</i>	101				101
Threehorn Wartyback#	<i>Obliquaria reflexa</i>	223				223
Pyramid Pigtoe*■	<i>Pleurobema rubrum</i>			1	2	3
Round Pigtoe#	<i>Pleurobema sintoxia</i>	12				12
Ohio Pigtoe*	<i>Pleurobema cordatum</i>	2				2
Pink Heelsplitter	<i>Potamilus alatus</i>	80	1	1		82
Pink Papershell	<i>Potamilus ohioensis</i>	3				3
Wartyback*	<i>Cyclonaias nodulata</i>	108	1	1	1	111
Mapleleaf	<i>Quadrula quadrula</i>	26				26
Monkeyface*	<i>Theliderma metanevra</i>	1				1
	Grand Total	896	3	3	3	905

* - Ohio Endangered; # - Ohio Species of Concern; ■ - Kentucky Endangered

2025 Mussel Salvage of the bridge area and the Pete Rose landing area:

Table 2 - Mussel Data by Salvage Area

Species	Common Name	RDB	Pete Rose	LDB	Cumulative	Relative Abundance
<i>Actinonaias ligamentina</i>	Mucket	0	0	1	1	1.7%
<i>Amblema plicata</i>	Threeridge	2	1	0	3	5.0%
<i>Cyclonaias nodulata</i>	Wartyback	0	1	8	9	15.0%
<i>Fusconaia flava</i>	Wabash Pigtoe	0	4	8	12	20.0%
<i>Lampsilis teres</i>	Yellow Lampmussel	0	1	0	1	1.7%
<i>Megalonaias nervosa</i>	Washboard	1	0	0	1	1.7%
<i>Obliquaria reflexa</i>	Threehorn Wartyback	1	0	7	8	13.3%
<i>Potamilus alatus</i>	Pink Heelsplitter	0	6	4	10	16.7%
<i>Potamilus ohioensis</i>	Pink Papershell	0	0	12	12	20.0%
<i>Pyganodon grandis</i>	Giant Floater	0	0	1	1	1.7%
<i>Quadrula quadrula</i>	Mapleleaf	0	0	1	1	1.7%
<i>Theliderma metanevra</i>	Monkeyface	1	0	0	1	1.7%
Totals:		5	13	42	60	100.0%

BioSurvey Group was tasked with writing a memo analyzing potential impacts to mussels from the pilings located outside of the mussel salvage area. Based on mussel densities found during the Phase 1/Phase 2 survey and the mussel salvage, the average mussel density in the project area, fewer than one mussel (0.33 mussel) is expected to occur in the

areas directly impacted by the pilings. If these areas were salvaged with a 5 meter buffer around each piling per the Ohio Mussel Survey Protocol, approximately 14 mussels may be located in the salvage zones. Their entire analysis is included in the attached document. None of the pilings are located in the areas of highest mussel density downstream of the pier and closer to the center of the channel. The two pilings in this area are located along the channel edge in zones with lower mussel density.

KYTC has updated the consultation with the USFWS Kentucky Field Office, which is the lead USFWS office for this project. Their updated consultation stated that While the substrate and flow regime of the Ohio River provides suitable habitat for federally-listed mussel species, none were found during the mussel survey or the more extensive mussel salvage effort undertaken by the project team, which suggests probable absence from the area of direct impact and subsequent buffer areas. With the project's commitment to maintain proper sediment and erosion control measures in place during construction, suitable habitat will likely continue to support mussel species in the future. Given this, a **“may affect, not likely to adversely affect”** determination has been made for all the listed mussel species.

A copy of both mussel survey reports and the BioSurvey Group memo (attached above) are included in the project file in Environet under the Ecological Folder in the Reports sub-folder. A copy of the coordination email will be included in the Coordination sub-folder.

Jeff/Kyla — We are requesting concurrence from ODNR-DOW that no further mussel salvage work will be required for this project.

Lindsey/Karen — Since the Kentucky Field Office is the lead USFWS office for this project, we are assuming that all USFWS comments/concurrence will come from that office. If that is not the case, please let me know that you plan to comment.

If any of you have any questions, please feel free to contact me.

Megan Michael

Environmental Specialist 3
Office of Environmental Services
1980 W. Broad Street, Mail Stop 4170

Columbus, Ohio 43223
(p) 614.644-7099
transportation.ohio.gov



**Department of
Transportation**

Becky Rude

From: Logsdon, Andrew M (KYTC) <Andrew.Logsdon@ky.gov>
Sent: Wednesday, April 15, 2026 9:33 AM
To: Becky Rude; Adrienne Earley; Baughman, Pamela (FHWA); Adam Johnson; Hans, Stacey D (KYTC-D06)
Subject: FW: Brent Spence Bridge Corridor Project-Barge Mooring Location Coordination to address mussels
Attachments: 6-17 Brent Spence Corridor Project USFWS coordination March 2026.pdf; Brent Spence Bridge Corridor Overall Access Plan.pdf; 22-0055658_BrentSpenceBridge_Addendum3_JCL.pdf; RE: Brent Spence Proposed Mooring Pilings ; Brent Spence Proposed Mooring Pilings
Categories: Reference

External Email: Use caution when clicking on links, replying, or opening attachments.

Pam and Becky,

Below you will find the email coordination I sent last week that informed the KDOW that we coordinated with Army Corps and USFWS on barge mooring. This was one more convo I thought you needed on record. Bryan Killian replied on the same day a couple hours later with simply the message: "Received, thanks!"

Andrew

From: Logsdon, Andrew M (KYTC)
Sent: Friday, April 10, 2026 9:29 AM
To: Killian, Bryan (EEC) <bryan.killian@ky.gov>
Cc: Vogeler, Samantha N (EEC) <samantha.vogeler@ky.gov>; Michels, Adam C (KYTC) <Adam.Michels@ky.gov>; Adrienne Earley <adrienne.earley@dot.ohio.gov>; Chitwood, Makayla E (KYTC) <makayla.chitwood@ky.gov>
Subject: FW: Brent Spence Bridge Corridor Project-Barge Mooring Location Coordination to address mussels

Bryan,

A coordination update on the Brent Spence Corridor Project. Attached you will find a letter KYTC sent to USFWS-KY Field Office on March 9th to address some barge mooring in the Ohio River. Also attached is their response letter (22-0055658 BrentSpenceBridge_Addendum3_JCL.pdf). If you have any questions about this coordination, please let me or Makayla know.

Also at the same time ODOT reached out to the Huntington Corps Office to confirm the barge moorings are not considered additional fill (Brent Spence Proposed Mooring Pilings attached email). We met on Teams with Brett at

Huntington to clarify the type of moorings that will be needed. Attached is an email confirming from Brett that it was not a fill activity to moor barges.

If you have any questions about these coordination efforts with our federal permitting partners, please let us know. We wanted to get these responses finalized for our records before we sent them to the state agencies (OH EPA is being provided a similar email).

Andrew Logsdon

From: Logsdon, Andrew M (KYTC)
Sent: Thursday, March 12, 2026 3:35 PM
To: Phil_DeGarmo@fws.gov; 'Fagin, Taylor L' <taylor_fagin@fws.gov>
Cc: Chitwood, Makayla E (KYTC) <makayla.chitwood@ky.gov>; Click, Nathan (KYTC) <Nathan.Click@ky.gov>
Subject: RE: Brent Spence Bridge Corridor Project-Barge Mooring Location Coordination to address mussels

Phil and Taylor,

Just an update on this. A similar letter was also sent to OH DNR since they were the agency that required a mussel salvage to take place prior to construction. They have replied back to ODOT that no further mussel salvage effort will be required due to the addition of these barge mooring activities in the Ohio R. Not a Section 7 determination obvs, but still relevant to the context of this coordination.

Let us know if you guys need anything.

Andrew

From: Logsdon, Andrew M (KYTC)
Sent: Monday, March 9, 2026 8:51 AM
To: KentuckyES, FW4 <kentuckyes@fws.gov>; Phil_DeGarmo@fws.gov; Fagin, Taylor L <taylor_fagin@fws.gov>
Cc: Chitwood, Makayla E (KYTC) <makayla.chitwood@ky.gov>; Matt.Raymond@dot.ohio.gov;
Megan.Michael@dot.ohio.gov; Adrienne Earley <adrienne.earley@dot.ohio.gov>; Click, Nathan (KYTC) <Nathan.Click@ky.gov>
Subject: Brent Spence Bridge Corridor Project-Barge Mooring Location Coordination to address mussels

USFWS-KY Field Office,

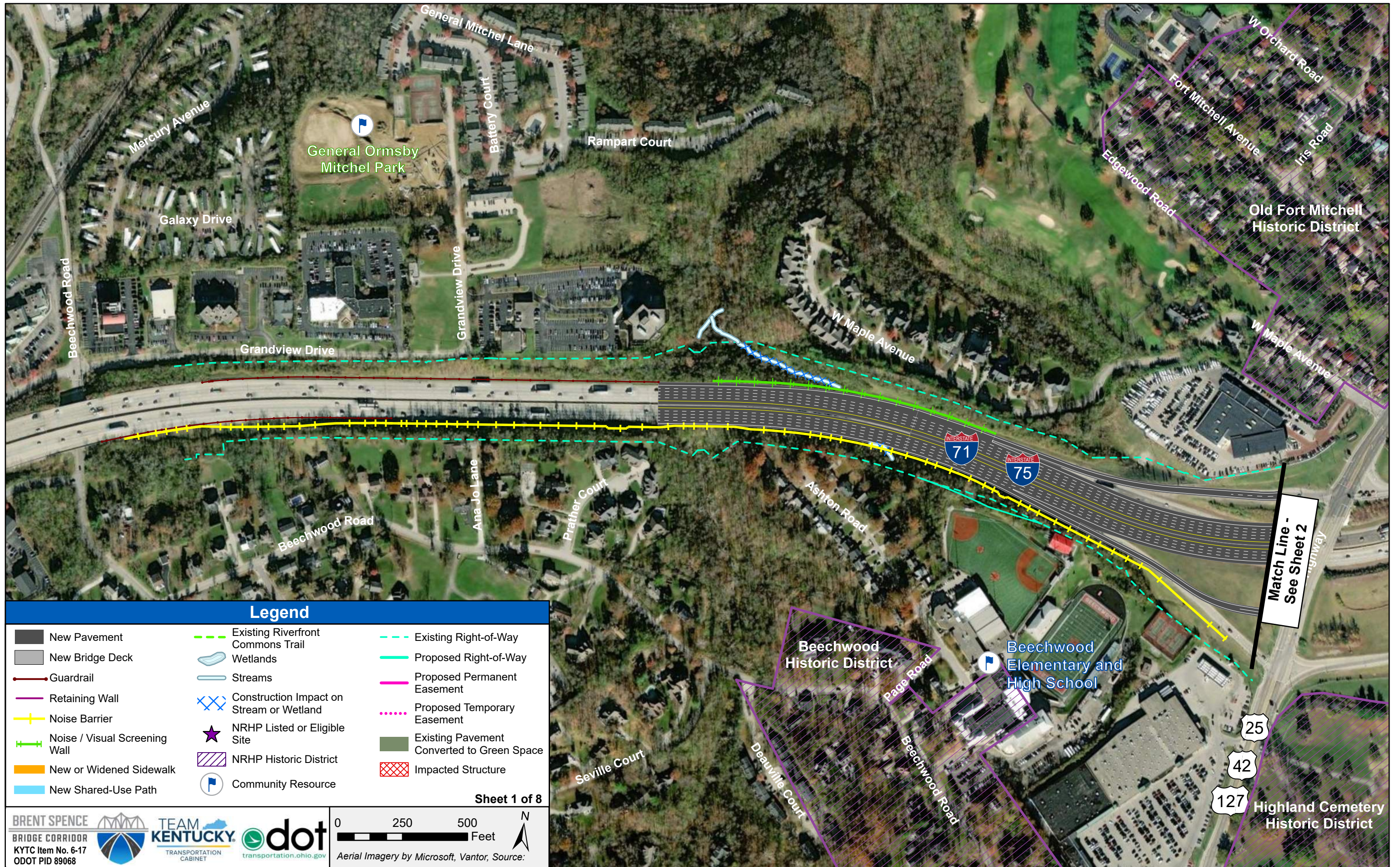
The Walsh-Kokosing Design Build Team (WKDBT) has identified barge mooring locations that will be used to facilitate the construction of the companion bridge adjacent to the existing Brent Spence Bridge over the Ohio River. Several of these pilings occur in areas of the river not covered in the 2025 mussel salvage efforts. The attached Section 7 coordination letter (and exhibit) addresses these additional areas and discusses the potential impacts to mussels. Please let me know if you have any questions or require more information.

Respectfully,

Andrew Logsdon



Attachment 4: Re-eval 3 Design Exhibit

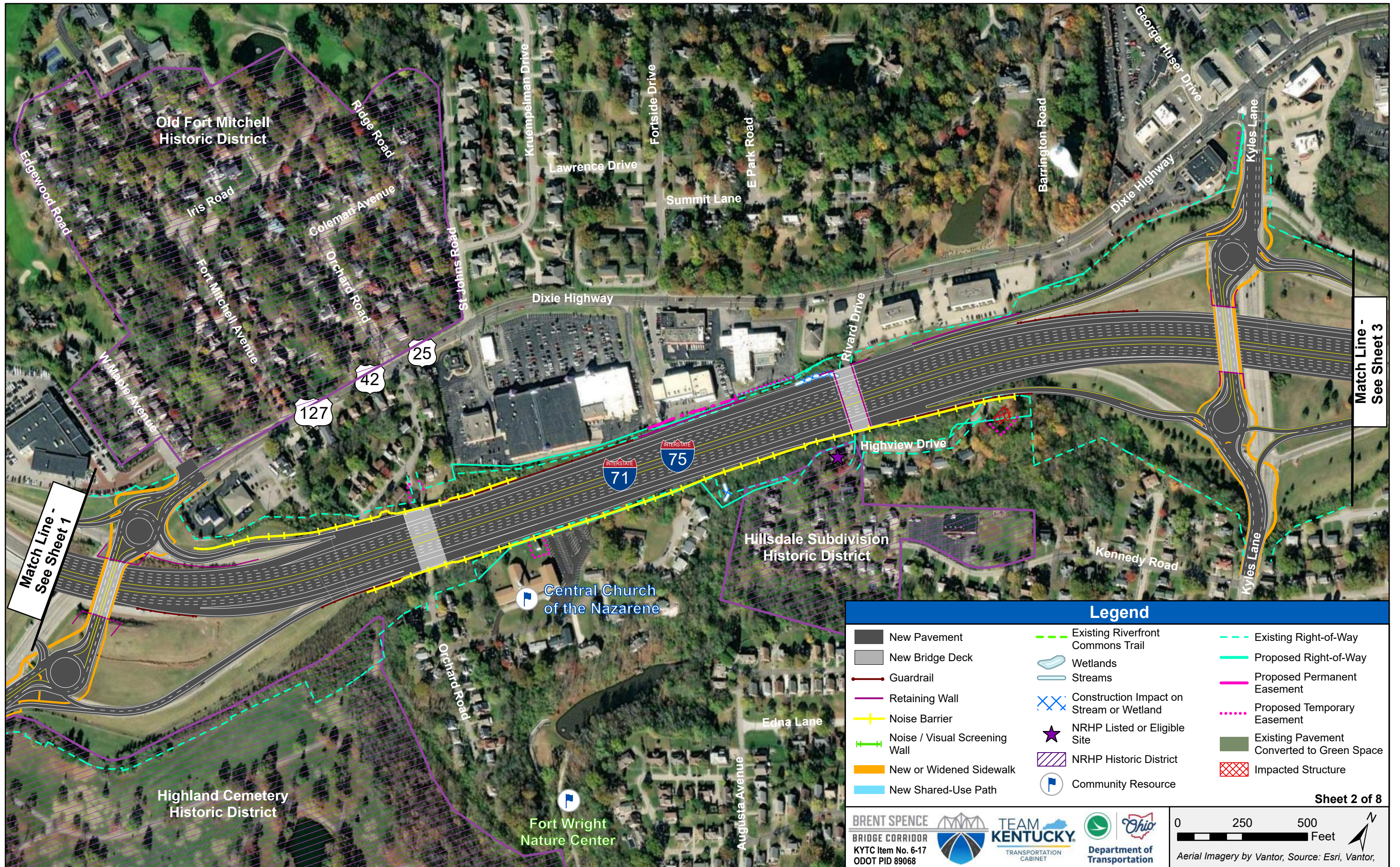


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Sheet 1 of 8

Match Line - See Sheet 2



Match Line -
See Sheet 1

Match Line -
See Sheet 3

Legend			
	New Pavement		Existing Riverfront Commons Trail
	New Bridge Deck		Wetlands
	Guardrail		Streams
	Retaining Wall		Construction Impact on Stream or Wetland
	Noise Barrier		NRHP Listed or Eligible Site
	Noise / Visual Screening Wall		NRHP Historic District
	New or Widened Sidewalk		Community Resource
	New Shared-Use Path		Existing Right-of-Way
			Proposed Right-of-Way
			Proposed Permanent Easement
			Proposed Temporary Easement
			Existing Pavement Converted to Green Space
			Impacted Structure

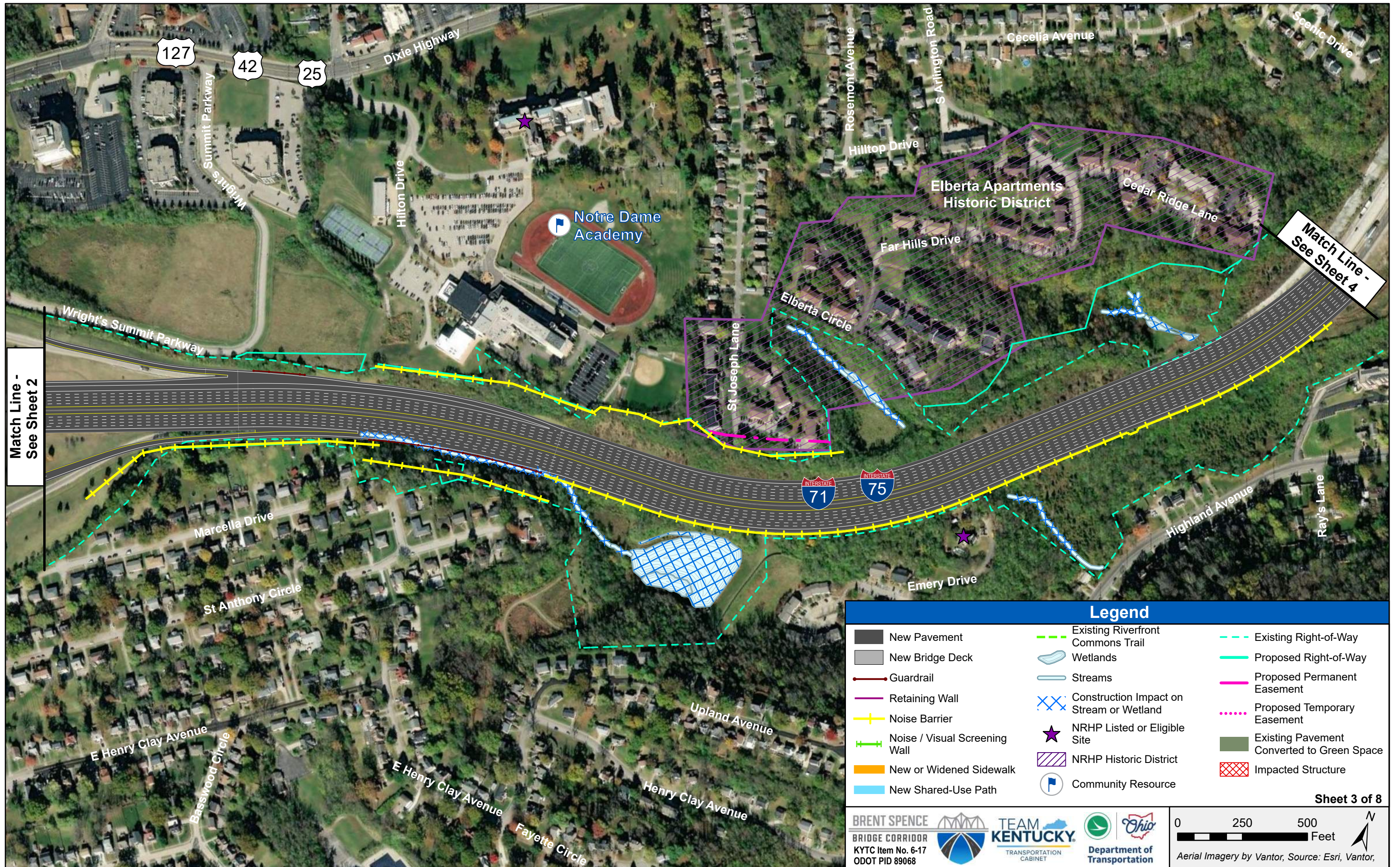
BRENT SPENCE BRIDGE CORRIDOR
 KYTC Item No. 6-17
 ODOT PID 89068

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Ohio
 Department of Transportation

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Aerial Imagery by Vantor, Source: Esri, Vantor,



Match Line -
See Sheet 2

Match Line -
See Sheet 4

Legend

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| New Pavement | Existing Riverfront Commons Trail | Existing Right-of-Way |
| New Bridge Deck | Wetlands | Proposed Right-of-Way |
| Guardrail | Streams | Proposed Permanent Easement |
| Retaining Wall | Construction Impact on Stream or Wetland | Proposed Temporary Easement |
| Noise Barrier | NRHP Listed or Eligible Site | Existing Pavement Converted to Green Space |
| Noise / Visual Screening Wall | NRHP Historic District | Impacted Structure |
| New or Widened Sidewalk | Community Resource | |
| New Shared-Use Path | | |

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 Aerial Imagery by Vantor, Source: Esri, Vantor,

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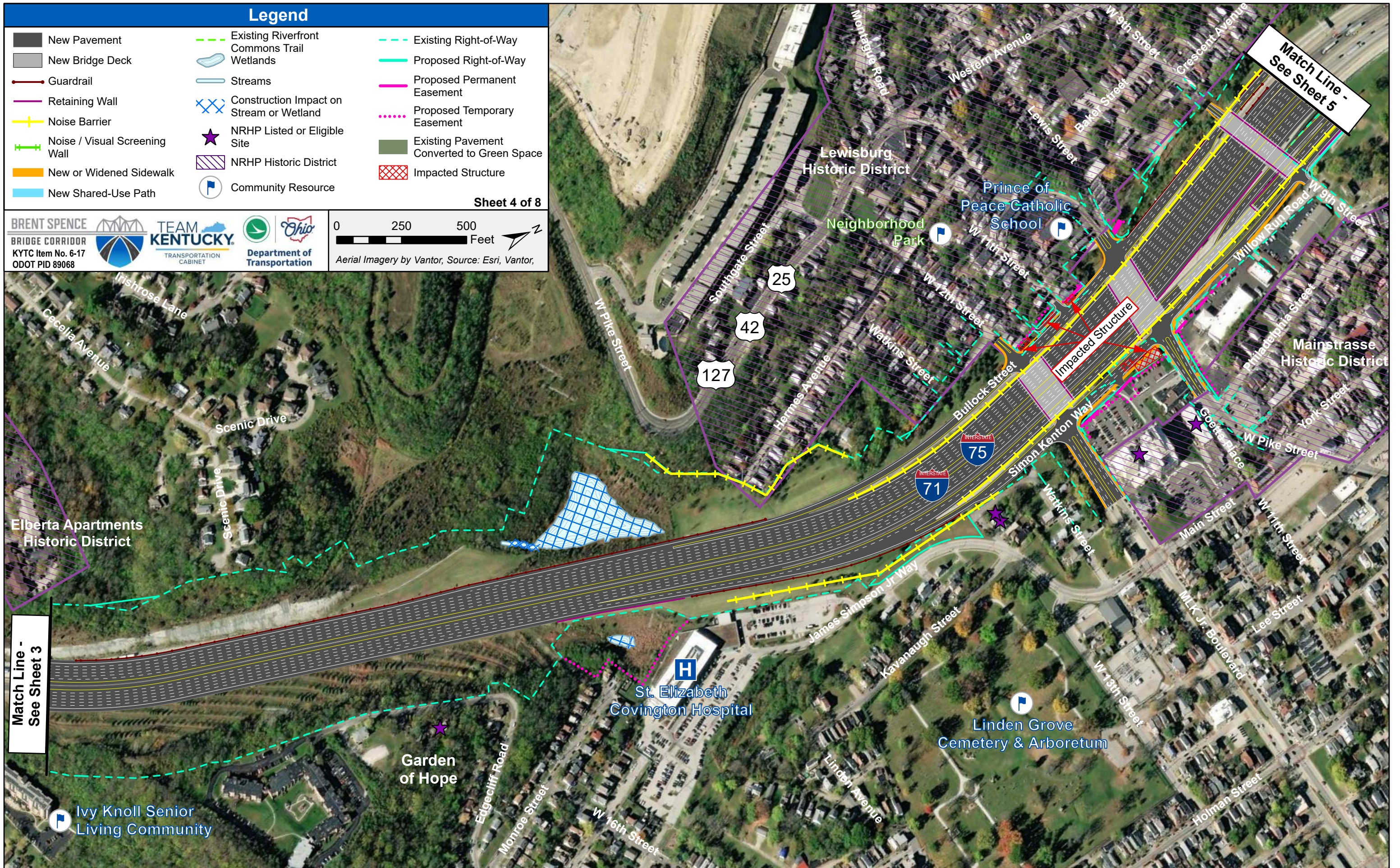
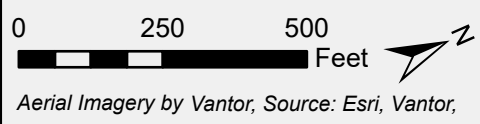
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| | New Bridge Deck | | Wetlands | | Proposed Right-of-Way |
| | Guardrail | | Streams | | Proposed Permanent Easement |
| | Retaining Wall | | Construction Impact on Stream or Wetland | | Proposed Temporary Easement |
| | Noise Barrier | | NRHP Listed or Eligible Site | | Existing Pavement Converted to Green Space |
| | Noise / Visual Screening Wall | | NRHP Historic District | | Impacted Structure |
| | New or Widened Sidewalk | | Community Resource | | |
| | New Shared-Use Path | | | | |

Sheet 4 of 8

BRENT SPENCE
BRIDGE CORRIDOR
KYTC Item No. 6-17
ODOT PID 89068

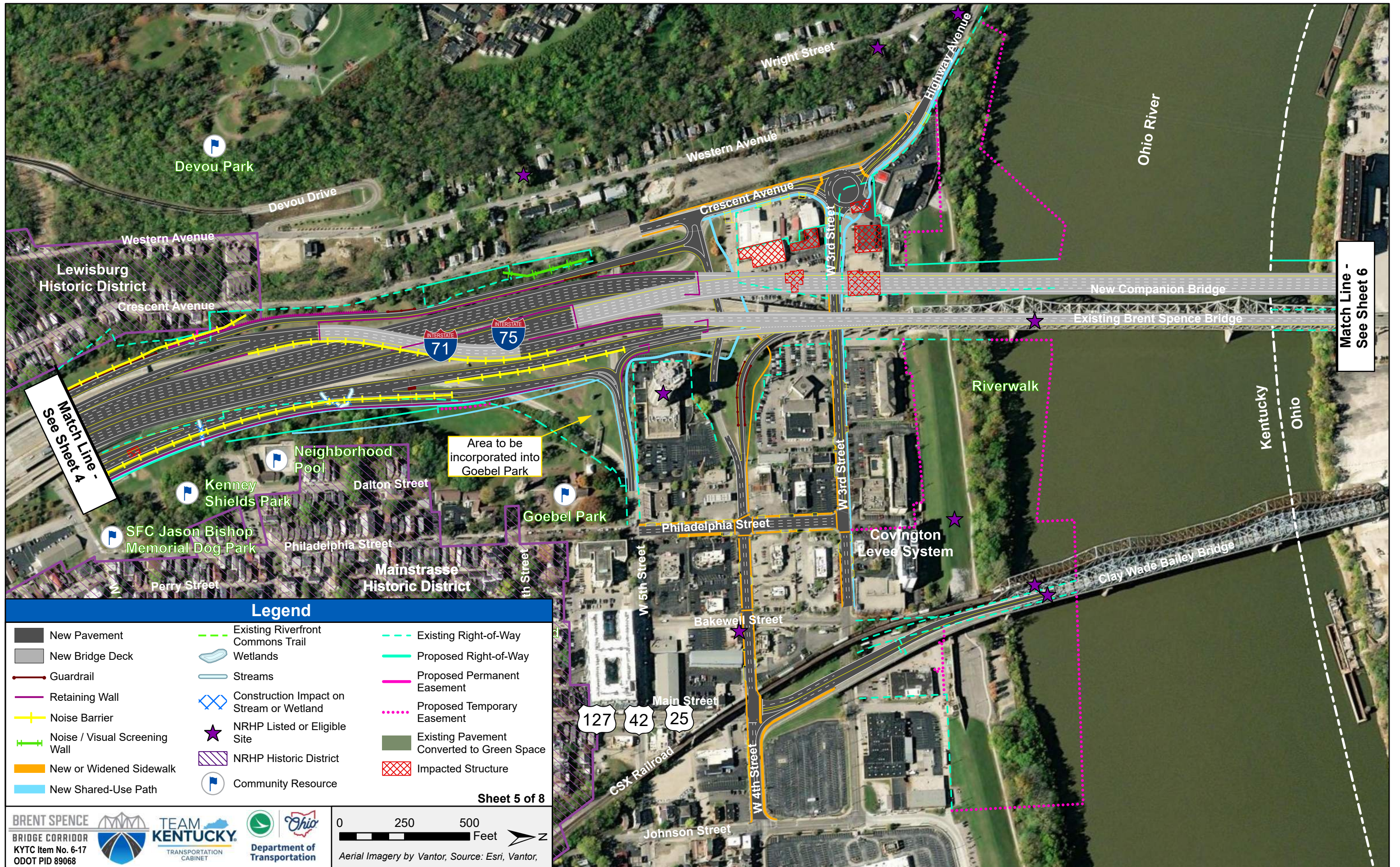
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Match Line -
See Sheet 3

Match Line -
See Sheet 5



Match Line -
See Sheet 4

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See Sheet 6

Area to be
incorporated into
Goebel Park

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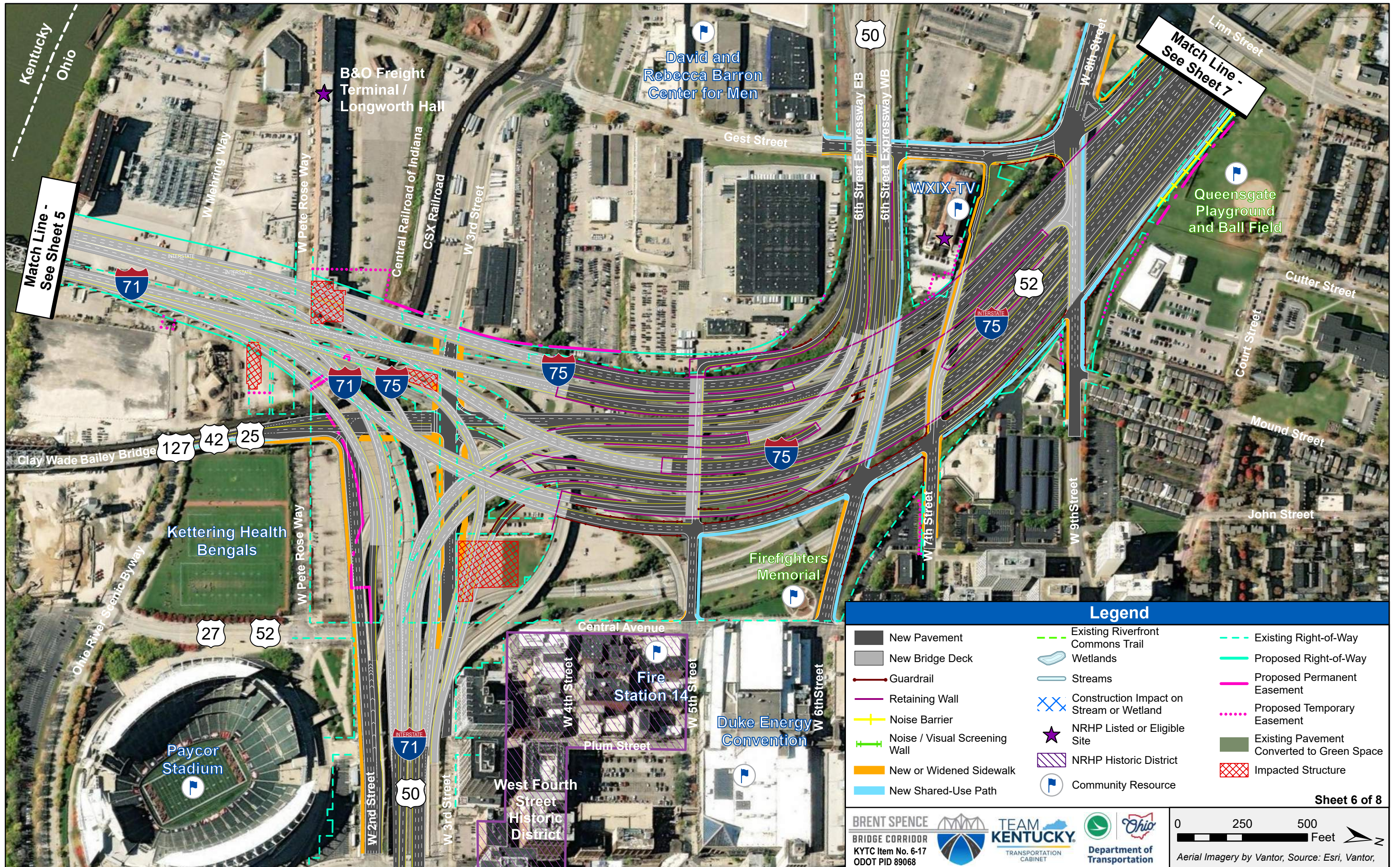
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| New Bridge Deck | Wetlands | Proposed Right-of-Way |
| Guardrail | Streams | Proposed Permanent Easement |
| Retaining Wall | Construction Impact on Stream or Wetland | Proposed Temporary Easement |
| Noise Barrier | NRHP Listed or Eligible Site | Existing Pavement Converted to Green Space |
| Noise / Visual Screening Wall | NRHP Historic District | Impacted Structure |
| New or Widened Sidewalk | Community Resource | |
| New Shared-Use Path | | |

Sheet 5 of 8

BRENT SPENCE
BRIDGE CORRIDOR
KYTC Item No. 6-17
ODOT PID 89068

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Aerial Imagery by Vantor, Source: Esri, Vantor,



Legend

New Pavement	Existing Riverfront Commons Trail	Existing Right-of-Way
New Bridge Deck	Wetlands	Proposed Right-of-Way
Guardrail	Streams	Proposed Permanent Easement
Retaining Wall	Construction Impact on Stream or Wetland	Proposed Temporary Easement
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New or Widened Sidewalk	Community Resource	
New Shared-Use Path		

BRENT SPENCE
 BRIDGE CORRIDOR
 KYTC Item No. 6-17
 ODOT PID 89068

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| | New Bridge Deck | | Wetlands | | Proposed Right-of-Way |
| | Guardrail | | Streams | | Proposed Permanent Easement |
| | Retaining Wall | | Construction Impact on Stream or Wetland | | Proposed Temporary Easement |
| | Noise Barrier | | NRHP Listed or Eligible Site | | Existing Pavement Converted to Green Space |
| | Noise / Visual Screening Wall | | NRHP Historic District | | Impacted Structure |
| | New or Widened Sidewalk | | Community Resource | | |
| | New Shared-Use Path | | | | |

Sheet 7 of 8

BRENT SPENCE
BRIDGE CORRIDOR
KYTC Item No. 6-17
ODOT PID 89068

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TRANSPORTATION CABINET

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| | New Pavement | | Existing Riverfront Commons Trail | | Existing Right-of-Way |
| | New Bridge Deck | | Wetlands | | Proposed Right-of-Way |
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| | New or Widened Sidewalk | | Community Resource | | |
| | New Shared-Use Path | | | | |

Sheet 8 of 8

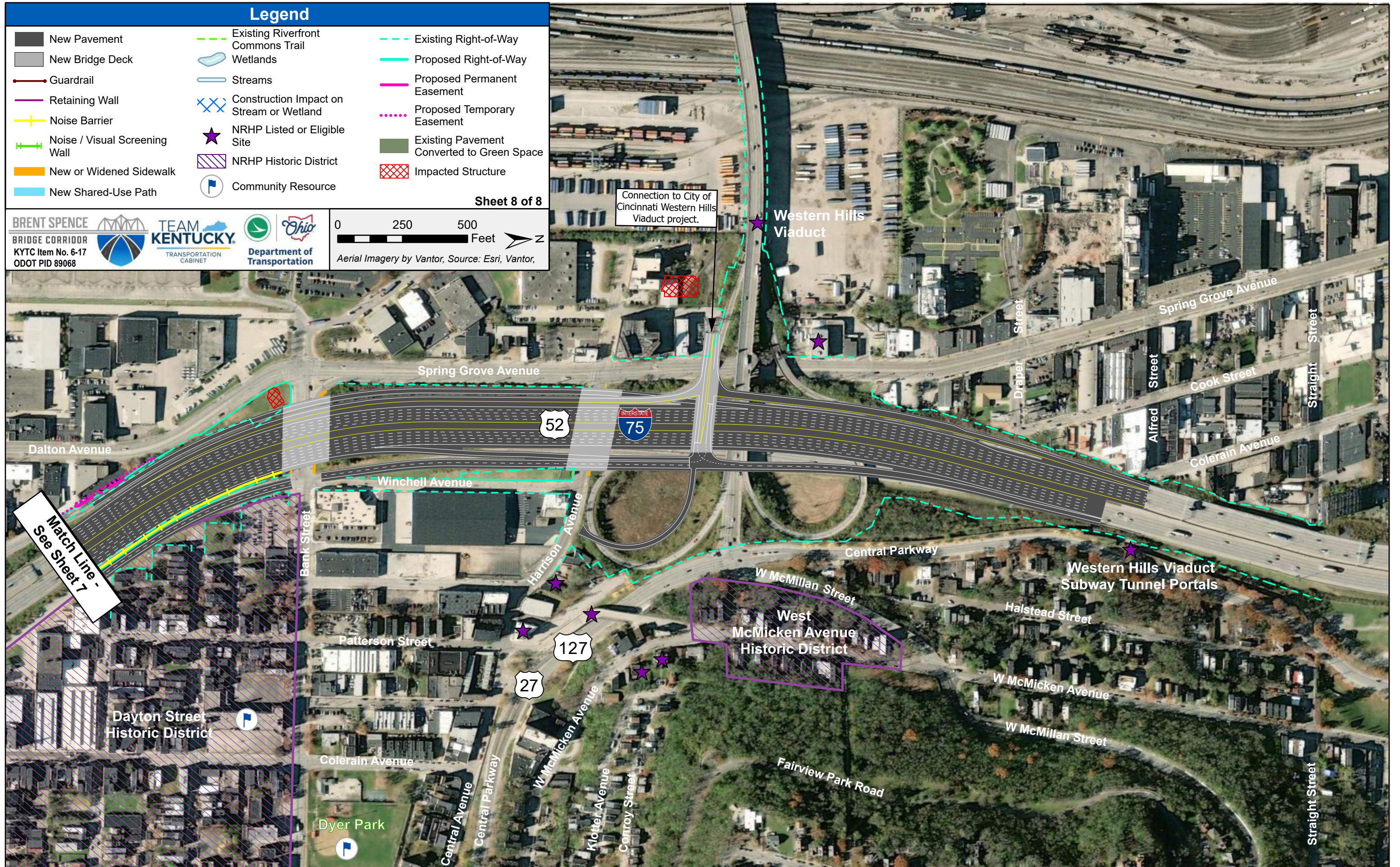
BRENT SPENCE
BRIDGE CORRIDOR
KYTC Item No. 6-17
ODOT PID 89068

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Connection to City of Cincinnati Western Hills Viaduct project.

Western Hills Viaduct

Western Hills Viaduct Subway Tunnel Portals

Match Line - See Sheet 7