United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

ER 02/691

Mr. John R. Baxter, P.E.
Division Administrator
Federal Highway Administration
Room 254, Federal Office Building
575 North Pennsylvania Street
Indianapolis, Indiana 46204

Dear Mr. Baxter:

As requested, the Department of the Interior (Department) has reviewed the July 2002 Tier 1 Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation for the **I-69 Evansville to Indianapolis Study**, involving 26 counties in southwestern Indiana. The Department offers the following comments and recommendations for your consideration:

SECTION 4(f)/6(f) EVALUATION COMMENTS

Multiple-Use Lands

Chapter 8 in the DEIS provides a Draft Section 4(f) Evaluation (Evaluation) of the potential impacts of the alternatives on section 4(f) resources including historic properties and publicly owned parks, recreation areas, and wildlife areas. The Evaluation indicates a number of "multiple-use" lands shown on figure 8-1 were investigated for the potential applicability of section 4(f). Several areas were determined not to be section 4(f) resources based upon the fact that the areas provide only dispersed recreation. These areas include the Tincher Special Area (TSA) of the Hoosier National Forest, the Morgan/Monroe State Forest, and the Martin State Forest. The Kelster Forest Legacy Property was determined not to be subject to section 4(f) due to the fact that it is not open to the public and is not for recreational activities. Unfortunately, the Evaluation focuses entirely on the recreational-use aspects of these areas and fails to address the question of the potential applicability of section 4(f) to these areas as wildlife refuges or natural preserves. 8.2

Wildlife Refuges and Natural Preserves

According to the Federal Highway Administration's (FHWA) section 4(f) policy paper (dated September 24, 1987, and revised June 7, 1989), section 4(f) applies to those portions of multiple-use public land holdings (e.g., National Forests and State Forests) "which are designated by statute or identified in the management plans of the administering agency as being for parks, recreation, or wildlife or waterfowl refuge

purposes and which are determined to be significant for such purposes. For public land holdings which do not have management plans (or where existing management plans are not current) section 4(f) applies to those areas which function primarily for section 4(f) purposes."

Neither the section 4(f) policy paper nor section 4(f) of the Department of Transportation (DOT) Act of 1966 explicitly define what constitutes a "wildlife or waterfowl refuge." In addressing the potential applicability of section 4(f) to wildlife management areas, the policy paper indicates "the property should be examined to determine its 'refuge' characteristics. If the wildlife management area primarily functions as a sanctuary or refuge for the protection of species, section 4(f) would apply." This functional definition of a refuge is basically consistent with that expressed by Congress in the National Wildlife Refuge System (NWRS) Administration Act of 1966 and the NWRS Improvement Act of 1997. As stated in the 1997 Act, the mission of the NWRS is "to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans." The 1977 Act establishes hunting, fishing, wildlife observation and photography, and environmental education and interpretation as "priority public uses" where compatible with the mission and purpose of individual national wildlife refuges. Congress recognized the taking of individuals of wildlife species through regulated hunting is not inherently incompatible with the conservation mission of individual national wildlife refuges. Neither do we believe that the allowance of hunting on other types of multiple-use public lands should disqualify the lands from the requirements of section 4(f) if a major purpose or function of the land is the conservation of wildlife and/or the preservation of ecological functions or geological features of the area. 8.2 8.2

Tincher Special Area of the Hoosier National Forest: As indicated in appendix BB of the DEIS, the TSA was established in April 1991 by the Hoosier National Forest Land and Resource Management Plan Amendment, and a Special Area Management Plan (SAMP) was approved for the Area in 1995. The management practices as set forth in the 1995 SAMP are found on page 23 of the SAMP included in appendix BB, and are also discussed on pages 5-183 through 5-185 of the DEIS. These practices indicate the "Area shall be managed in a near natural condition with minimal manipulative disturbance. Emphasis is on preservation of the karst environment and conservation of the biological resources." Timber harvesting would not occur unless necessary to maintain the unique geologic or ecologic character of the area or support recreational development such as vistas or parking areas. In light of the conservation purposes for the TSA, we do not understand how a determination could be made that "Section 4(f) does not apply to the TSA as a whole . . . . " (page 8-8). The Department requests that FHWA reevaluate this determination and, in the Section 4(f) evaluation portion of the Tier 1 Final EIS, specifically address the applicability/nonapplicability of Section 4(f) to the TSA as a refuge or natural preserve. 8.2

Morgan/Monroe State Forest and Martin State Forest: The DEIS/section 4(f) evaluation (page 8-13) indicates the Morgan/Monroe State Forest (Forest) provides for dispersed recreation. No information is provided concerning the primary purposes for which the Forest is managed or whether the Forest, or some portions of it, functions as a refuge or natural preserve.

Page 8-8 of the Section 4(f) evaluation indicates that the Martin State Forest is a recreational area with hiking, camping, fishing, and hunting, and that the Forest encompasses an arboretum and an educational center. On page 6-186, the DEIS indicates the Forest is a high quality forest ecosystem and environmentally sensitive area. However, insufficient information is provided for the reviewer to determine the primary purposes for which the Forest is managed or whether the Forest, or some portions of it, functions as a refuge or natural preserve. 8.2

We recommend the Section 4(f) Evaluation portion of the Tier 1 Final EIS provide information concerning the management plans for these two State forests and specifically address whether the forests, or portions of them, are managed or function as a refuge or natural preserve.

Kelsier Forest Legacy Property: On page 8-3, the Section 4(f) evaluation indicates that the Kelsier Property is not subject to Section 4(f) due to the fact it is not open to the public and is not for recreational activities. If the area were managed or functioned as a refuge or natural preserve, the lack of public access would not preclude the area from being considered a Section 4(f) resource. However, it is our understanding the purpose of the Forest Legacy Program is to protect environmentally important forestlands by purchasing the development rights from willing sellers. The owners retain all other rights, including the right to harvest timber. Thus, it is likely Section 4(f) is not generally applicable to such areas. 8.2

Recreational Lands

The Evaluation fails to demonstrate if the respective land manager considers one of the major purposes of the areas as recreational, and as such, a section 4(f) resource.

Page 8-8 states that section 4(f) does not apply to the TSA of the Hoosier National Forest because the U.S. Forest Service (USFS) describes the recreational activities within the TSA as "dispersed." However, page 11-12 indicates the USFS concluded the TSA had a recreational use and on page 11-16 the DEIS states the USFS manages the TSA "to provide for recreational use." Similarly, the Indiana Department of Natural Resources (INDNR) manages Morgan-Monroe State Forest and Martin State Forest for recreational resources. Opportunities for hiking, camping, fishing, and other pursuits are provided by these areas (http://www.state.in.us/dnr/forestry/index.html). However, the DEIS (8-13) concludes the dispersed recreational activities of Morgan/Monroe State Forest do not make it subject to the requirements of Section 4(f). 8.2

While the final decision on applicability of Section 4(f) to a particular type of land is made by FHWA, the FHWA normally relies on the official having jurisdiction over the land to identify the kinds of activity or functions that take place. Please clarify the contradictory statements on pages 8-8, 11-12, and 11-16 and document whether or not the USFS or the INDNR considers recreation as one of the major purposes of the respective properties, and therefore, a Section 4(f) resource. 8.2

Proximity Impacts

The second paragraph of the Section 4(f) evaluation (page 8-1) mentions proximity impacts as potentially constituting a "use" of section 4(f) resources. However, the Evaluation does not provide any discussion of potential proximity impacts, such as increased noise and visual intrusion, of project alternatives on areas determined to be 4(f) resources. The DEIS section on highway noise impacts (section 5.10) mentions parks and recreation areas as potential sensitive receptors to be addressed in the noise analysis but fails to specifically mention other 4(f) resources. To the extent possible, the section 4(f) evaluation to be included with the Tier 1 Final EIS should discuss these potential impacts and possible measures to ameliorate any such impacts. 8.2

Historic and Archaeological Resources

Please continue to coordinate with the State Historic Preservation Office (SHPO) and Advisory Council for Historic Preservation (ACHP). The final section 4(f) documentation submitted for the Department's concurrence should demonstrate that both the SHPO and ACHP concur with the findings and any proposed measures to minimize harm to the properties listed in or eligible for the National Register of Historic Places.

ENVIRONMENTAL IMPACT STATEMENT COMMENTS

General Comments

In general, the Department supports routes that upgrade or closely follow existing highways because new-terrain routes often result in the greatest loss and fragmentation of natural habitats and involve the most stream and river crossings at new locations. According to data presented in the DEIS, alternative 1 (upgrading I-70 and U.S. 41) would have far fewer negative environmental impacts than any of the other "build" alternatives. The DEIS clearly reveals that Alternative 1 would have the least impact on fish and wildlife resources, including federally threatened and endangered (T&E) species and their habitats, karst features, and rivers listed on the Nationwide Rivers Inventory (NRI). Because Alternative 1 would have the least impacts on forests, wetlands, floodplains, rivers listed to the NRI, karst features, water quality, and section 4(f) resources, the Department supports this route as the most environmentally preferable of the build alternatives. In light of its many environmental (and cost) advantages, we recommend the FHWA and the Indiana Department of Transportation 6.2

(INDOT) consider removing Alternative 1 from the list of "non-preferred" alternatives and selecting it as their preferred alternative. Furthermore, the U.S. Fish and Wildlife Service (FWS) believes selection of Alternative 1 would best fulfill FHWA's responsibility to use its authorities to conserve endangered and threatened species as set forth in Section 7(a) 1 of the Endangered Species Act (ESA). 6.2

We fully concur with Alternatives 3A, 5A, and 5B being considered "non-preferred" alternatives because they would cause "such serious impacts on critical, high quality natural areas that they present virtually insurmountable obstacles to selection as a preferred alternative, particularly in light of the availability of other alternatives with similar or better performance that avoid these highly sensitive resources." We also believe alternative 3B (and to a lesser extent 3C) should also be considered as a non-preferred alternative and eliminated from further consideration because of its adverse direct and indirect effects on the federally endangered Indiana bat and on the unique karst features and fauna within the Garrison Chapel Valley (GCV) in western Monroe County. 6.2

Multiple Indiana bat hibernacula (i.e., caves) are located within the GCV; two of these caves are only about 1.5 miles from the working alignment of Alternative 3B (and 3A). Even though the GCV is the largest karst area in Monroe County with over 17 miles of known cave passages, its diversity of troglobitic species has not been fully surveyed (pers. comm. of FWS with Dr. Julian Lewis). In addition to Indiana bats, there are other bat species; cave salamanders, troglobitic isopods (*Caecidotea stygia*, *Caecidotea jordani*), amphipods (*Crangonyx, Bactrurus*), crayfish (*Orconectes inermis*), beetles (*Pseudanopthalmus* - a couple of species, including at least one undescribed one), millepedes (*Conotyla bollmani*), spiders (*Phanetta subterranea*), and flies (*Spelobia tenebrarum*) present in the GCV karst ecosystem. Furthermore, it is quite possible endemic species that are new to science exist in this extensive karst ecosystem and await discovery. Alternative 3 (where 3A, 3B, and 3C share a common route) also comes within approximately 1 mile of a known Indiana bat hibernaculum in eastern Greene County. 5.17

We agree with the DEIS statement that "loss of karst and caves is non-replaceable." Because caves are a non-renewable resource and so few are suitable as hibernacula for Indiana bats, impacts to all Indiana bat hibernacula should be avoided, especially when other alternatives exist. Indiana bats are known to forage up to 5 miles from their hibernacula during the fall swarming and spring staging periods. Therefore, any alternative that would require removal of forest habitat within a 5-mile radius of a hibernaculum (i.e., 3A, 3B, 3C, 5A, and 5B) is likely to cause adverse effects to Indiana bats and potentially hinder recovery of the species. Therefore, we recommend preference be given to routes that would have little or no impact on karst areas (e.g., alternative 1). 5.17

Summary of Department's Views on Alternatives

Alternative 1

- Has the fewest impacts to T&E species, forests, core forests, wetlands, floodplains, karst features, rivers listed on the NRI, and water quality.
- The Department's most preferred of the build alternatives.

6.2

Alternative 2

- Relatively low impacts to forests, wetlands, and T&E species. The Department prefers 2A or 2B rather than 2C. All three have similar environmental impacts, although 2A and 2B do not include NRI river crossings.
- The Department does not have significant objections to any of the Alternative 2 routes.

6.2

Alternative 3

- High impacts to forest, core forest, and karst features associated with new-terrain alignments. All three alternatives include a river crossing over the East Fork of the White River which was listed on the NRI because of scenic and recreational values, among other significant characteristics.
- Close proximity to multiple Indiana bat hibernacula.
- The Department considers 3A and 3B environmentally unacceptable because of their serious impacts to Bean Blossom Bottoms and Indiana bat hibernacula and habitat within the GCV, respectively.
- The Department has significant objections to 3C. However, because 3C would have fewer impacts to forest, core forest, wetlands, and streams, it is preferred over either 3A or 3B.

6.2

Alternative 4

- Low impacts to forests, core forests, and caves.
- High impacts to wetlands and streams.
- The Department has little preference between 4A, 4B, and 4C, as all three have similar environmental impacts.
- At the Tier 1 level of analysis, the Department does not have significant objections to alternative 4 corridors unless wetland impacts cannot be adequately mitigated. The Department considers Alternative 4 corridors to be better than the Alternative 3 or Alternative 5 corridors in terms of impacts to Indiana bat habitat.

6.2

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Alternative 5

- The Department considers Alternative 5 (5A and 5B) environmentally unacceptable because of its serious impacts to caves, karst features, karst hydrology, and troglobitic fauna; very high impacts to forests and core forests and their associated fauna (e.g., neotropical migratory birds); and its likelihood of adversely affecting federally endangered mussel species and Indiana bat foraging and roosting habitat. 6.2

No-Build Alternative

- According to NEPA regulations (Sec. 1502.14), all reasonable alternatives are to be "rigorously" explored and given an equal level of analysis and consideration. The DEIS fails to give the no-build alternative a rigorous or equal analysis. Therefore, we were unable to adequately compare or evaluate differences between the no-build alternative and other build alternatives in regard to their direct, indirect, and cumulative effects on the environment. 6.2

The DEIS states the no-build alternative consists of the "existing" highway network, plus projects which are considered "committed" (the "e + c" network; page 3-20). The DEIS lists examples of committed major projects within the Study Area (e.g., added travel lanes to I-70, upgrade of US 231 from Jasper area to the Ohio River, upgrade of US 50 east of Washington, construction of SR 641/Terre Haute Bypass, upgrade of US 41 in Vanderburgh County, upgrade SR37 in Orange County, and upgrade of SR 46 in Monroe County) that were included in the transportation analysis so the future transportation effects and benefits of each of the build alternatives could be estimated through the year 2025. However, it appears the DEIS failed to include these committed projects in any form of environmental impact analysis for the no-build alternative. For example, throughout the DEIS, it is simply stated the no-build alternative will have no impacts on the resources or use (such as threatened and endangered species, core forest habitat, wetlands, forest resources, or land use) being addressed in the particular section of the DEIS. If the no-build alternative truly includes committed construction projects, we must strongly disagree with these "no impact/effect" determinations. Environmental impacts will occur in southwestern Indiana over the next 25 years whether I-69 is completed or not, and these impacts need to be described in as much detail as they were for the other alternatives. Without rigorous and equal analysis of the no-build alternative, the "big picture" issues this EIS is intended to address (i.e., whether or not to complete I-69 in southwestern Indiana, and if so, which corridor should be used for I-69; page S-3) will remain difficult to evaluate. 5.1.3 6.2

We recommend the no-build alternative be clearly defined (i.e., define the project baseline) and that it be given a level of analysis consistent with that of the build alternatives. The Final EIS should also disclose whether the no-build alternative is either a "preferred" or "non-preferred" alternative (pages S-32 and S-33).

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Specific Comments

VOLUME I - the Draft EIS

Page S-19: The sentence beginning with "Alternative 4B is a moderately high performer with high scores . . .," is repeated. S.5.1

Page S-20: It is unclear to us why section S.5.2, environmental impacts analysis, gives no attention to the GCV as an environmentally sensitive area that may be impacted by the project, when others that may be less sensitive, such as Flat Creek Wetland Complex, are given attention. S.5.2

Page S-21/22: Please include rivers listed on the NRI and summarize impacts with respect to significant resource values, including scenic and recreational resources. Noise and visual impacts to recreational and scenic values should be addressed. S.5.2

Page S-24: Table S-6 contains a wealth of information; however, as presented here, it is exceedingly difficult for the reviewer to clearly discern which alternatives perform the best in regard to the stated purpose and need for the project and in avoiding/minimizing adverse environmental impacts. An overall index or relative ranking system for each criterion, as well as totaled for each alternative, is needed to facilitate comparisons of alternatives. S.6

Page S-26 and page 6-6: Under "Advantages" of Alternative 3B is listed "Low potential impacts to karst features (e.g., caves, sinkholes, sinking streams basins; 30 acres)." The FWS strongly disagrees with this statement and feels this analysis is inadequate and misleading. First, the DEIS fails to clearly distinguish caves (i.e., potential Indiana bat hibernacula) from other karst features. The DEIS also fails to adequately consider the remarkably high density of caves in the GCV. For example, an area having a cave density of 8 caves/km^2 occurs within the 2-mile study band of Alternative 3B (page 6-12, Fig. 6-6). Similarly, an area with an apparent cave density of 14 caves/km^2 is located approximately 1 mile east of Alternative 3B's 2-mile study band. No other alternative crosses, or comes close to, any areas having a cave density as high as, or higher, than Alternative 3B. Therefore, even though the Alternative 3B corridor itself may cross a relatively small area of karst features, the FWS believes this corridor has a HIGH potential for impacts (both direct and indirect) to caves and cave-dwelling fauna because of its proximity to the GCV karst ecosystem and its juxtaposition within an urbanizing landscape. We recommend listing alternative 3B's high potential for impacts to karst features as a disadvantage. S.6

Page S-26/27, pages 6-6 and 6-8: Proximity to hibernacula for the federally endangered Indiana bat is listed as a "Disadvantage" of Alternatives 3A and 3C but not for alternative 3B, even though this alternative comes closer to the known hibernacula than the other two options. S.6

Page S-26/28: Potential increased costs due to mitigative measures for karst and forest habitat within 5-miles of Indiana bat hibernacula should be listed as "Disadvantages" of Alternatives 3A, 3B, and 3C. S.6

Page S-29: The INDOT and FHWA use economic growth as a selling point for the I-69 project, and on page S-29 the DEIS identifies the "extent and location of economic development that would be stimulated by the highway" as a "critical issue" and an "area of controversy." However, the DEIS fails to delineate/depict where potential development is most likely to occur along the alternative routes. The Final EIS should discuss such issues as: 1) where along the routes zoning restrictions are currently in place that would be protective of sensitive environmental areas and fish and wildlife resources; 2) the remaining capacity of existing industrial parks and the possible need for others to be developed; 3) the areas in which new industrial, commercial, and residential growth would most likely occur; and 4) whether applications for sanitary septic system permits are likely to increase, especially in karst areas. Without this type of information, we are unable to adequately assess the possible extent of indirect effects of reasonably foreseeable growth associated with each alternative on T&E species and other fish and wildlife resources. Therefore, we have based our recommendations on the cautious assumption that induced secondary impacts from I-69 are not likely to be protective of T&E species or sensitive fish and wildlife resources but are likely to destroy and/or further degrade important habitats within the vicinity of the alternative routes. S.7

Page S-33: We recommend including the definitions of "Karst" and "Threatened and Endangered Species" in this glossary of key terms. S.11

Page 1-10: We recommend the text under "Scope of Environmental Analysis" for Tier 2 NEPA Studies be expanded upon. This section should at least list the specific surveys/studies that will be conducted in tier 2 that were not conducted as part of Tier 1 studies (e.g., wetland delineations, T&E species surveys, and karst surveys). 1.5

Page 3-36, Section 3.4.3.4 - Improve Traffic Safety: It is unclear whether the traffic safety analysis included any consideration of the potential for vehicular impacts with deer. We assume deer densities vary along the five alternatives and some reasonable predictions can be made from existing deer population data and crash data. Such an analysis may reveal significant differences in driver safety among the alternatives. 3.4.3

Page 4-5, New Castle Till Plains: Change "Monroe" to "Morgan" County. 4.2.1

Page 4-17, Water Bodies: This section should indicate the East Fork of the White River and the West Fork of the White River are listed on the NRI, prepared by the National Park Service (NPS). The East Fork was listed on the NRI because of its outstanding scenic, recreational, geologic, fish, and historic values. The West Fork rivers were listed to the NRI because of the outstanding fish, wildlife, historic, and other values.

The NRI is a register of rivers that may be eligible for inclusion in the National Wild and Scenic River System. These rivers were included on the NRI based on the degree to which they are free-flowing, the degree to which the rivers and their corridors are undeveloped, and the outstanding natural and cultural characteristics of the rivers and their immediate environments. 4.2.5

Section 5(d) of the National Wild and Scenic Rivers Act requires, "In all planning for the use and development of water and related land resources, consideration shall be given by all Federal Agencies involved to potential national wild, scenic and recreational river areas.". In partial fulfillment of the section 5(d) requirements, the NPS has compiled and maintains the NRI.

Page 5-53: The final EIS should discuss whether any impacts on wildlife species were considered in the noise analysis. Any published studies that assessed impacts of highway noise on relevant T&E species that were sought and/or reviewed during the Tier 1 process should be mentioned. 5.10

Page 5-73 and 5-74: This section correctly identifies the East Fork of the White River and the West Fork of the White River as being listed on the NRI, prepared by the NPS, and correctly identifies the outstanding resource values (ORVs) the rivers possess.

It should be noted the intent of the NRI is to provide information to assist in making balanced decisions regarding use of the nation's river resources. A Presidential directive and subsequent instructions issued by the Council on Environmental Quality (CEQ) requires each Federal Agency, as part of its normal planning and environmental review processes, take care to avoid or mitigate adverse effects on rivers identified on the NRI. Further, all agencies are required to consult with the NPS prior to taking actions that could effectively foreclose wild, scenic, or recreational status for rivers on the inventory. The CEQ instructions include procedures to determine if a proposed action could have an adverse effect on the natural, cultural, and recreational values of the river. 5.11

The proposed project should be planned and implemented so as to avoid or mitigate adverse effects to the stated outstanding resources of the both rivers. While the DEIS identifies river corridor crossings associated with each alternative, it does not provide an analysis of potential impacts to the ORVs of either river, including impacts

associated with visual intrusions and noise. In the event Alternative 1, which avoids crossing the rivers is not selected as the preferred alternative, the Department strongly recommends that measures to reduce sedimentation during construction (best management practices) are incorporated into all erosion control plans and adhered to throughout the duration of the project. Additionally, we recommend the bridge deck be designed to prevent pollutants (fluids, oils, salts, etc.) from entering into the river. Design features to reduce visual impacts should be evaluated. 5.11

Page 5-123: In the first sentence under Indiana bat, insert the word "eastern" before the United States. 5.17

Page 5-125: In the top paragraph, in the phrase: "shorter hairs on the toes, and has a calcar," insert the word "keeled" before calcar. Most all bats have a calcar. The keel on the Indiana bat's calcar helps distinguish it from *Myotis lucifugus*. 5.17

Page 5-127: Please include scientific names for the bat species here and for mussel species later on to avoid any confusion. 5.17

Page 5-127: Regarding bald eagles in Indiana, we suggest you contact John Castrale with the INDNR, Division of Fish and Wildlife, to obtain the most current data from the 2002 breeding season. Also, Mr. Castrale's name is misspelled in the citation on this page. 5.17

Page 5-129: The correct spelling of the American burying beetle's family name is Silphidae. 5.17

Page 5-148: The Wetland MOU was signed on January 28, 1991, not 1999. 5.19

Page 5-169: We assume some utility rights-of-way (e.g., natural gas pipelines) would be required to be moved or shifted to accommodate the various alternatives. Similarly, induced economic development would lead to increased demand for fossil fuels and electricity, which may require expanding or clearing new rights-of-ways. Were indirect effects from these reasonably foreseeable impacts included in the DEIS impact analyses for forests, wetlands, and karst? 5.21

Page 5-171: Impacts to the Kaisler Forest Legacy Property in Monroe County should be avoided. Given its close proximity to Indiana bat hibernacula, it is likely Indiana bats use this large tract of contiguous forest as foraging and roosting habitat. 5.21

Page 5-173, Section 5.21.4 Mitigation: We recommend impacts to forests be mitigated by selecting a preferred alternative that avoids heavily forested areas. Alternative 1 would only impact a maximum of 170 acres of forest, whereas alternative 3B (considered a preferred alternative in the DEIS) would impact up to 1,450 acres of forest. Losses of large acreages of forest (especially near hibernacula) are likely to 5.21

adversely affect Indiana bat foraging and roosting habitat. Likewise, the increase in forest fragmentation resulting from the highway would negatively impact many neotropical migrant birds and impede dispersal of many small mammals, reptiles, and amphibians. 5.21

Page 5-186: "The Garrison Chapel Valley area includes a large karst valley, just east of the Monroe County Airport." Change direction to read "west," not east. 5.23

Page 5-187: The FWS thanks the INDOT for shifting Alternative 3's alignment to avoid a high priority Indiana bat hibernaculum that has been designated as critical habitat under the ESA. 5.23

Page 5-195: Because Alternatives 3 and 5 would have the greatest impacts to core forest habitat (398 to 682 acres), these routes would also be most likely to negatively impact Indiana bats and neotropical migrant birds. Therefore, we recommend Alternatives 1, 2, and 4 be given preference over Alternatives 3 and 5. 5.23

Page 5-217: Table 5.26-1 estimates 100 acres of forest and 10 acres of wetland would be impacted by adding an additional lane to I-70 from SR 641 to SR 267. However, the text near the bottom of this page states "no federal threatened and endangered species would be impacted" by this project. The FWS believes the federally endangered Indiana bat may be negatively affected by the loss of 100 acres of forest and 10 acres of wetland. Furthermore, an Indiana bat maternity colony is known to exist near the eastern terminus (SR 267) of the proposed I-70 widening project. 5.26

VOLUME II - Appendices

Appendix I - Federal and State Listed Species, Part 1, Federal Animals: Under "REPTILES" it reads, "The only federally threatened species is the northern copperbelly watersnake (CWS) (*Nerodia erythrogaster neglecta*). This subspecies is not known from southwestern Indiana." Actually, the subspecies is known from southwestern Indiana. However, the southern population in Indiana (below the 40th parallel) is not federally listed.

Appendix I - Federal and State Listed Species, Part 2, Federal Plants: A sixth federally protected plant occurs in Indiana that was inadvertently omitted from the text and table. Please add Short's Goldenrod (*Solidago shortii*) to the list. This plant is currently only known from one location in Harrison County. It is highly unlikely it occurs along any of the alternatives.

Appendix I: Federal and State Listed Species, Part 3, State Animals, Reptiles, State Endangered: Under Snakes and the northern Copperbelly Water snake (*Nerodia erythrogaster neglecta*), it states "There are actually two populations of the copperbelly water snake. The population that is state endangered is in the northeastern (sic)

Indiana." Actually, copperbelly water snakes are state endangered throughout the entire State of Indiana.

VOLUME III - Environmental Atlas

The FWS wants to commend the INDOT, FHWA, and Bernardin, Lochmueller & Associates, Inc. for creating an outstanding Geographic Information System (GIS) of the 26-county study area. This is by far the most thorough mapping the FWS has seen for a large project in Indiana. This GIS will be a powerful tool for this project and for many future projects in the State.

Our only suggested improvement to the Environmental Atlas would be to include the routes on USGS topographical maps so the topography and slope of the terrain being crossed can be clearly ascertained. Being able to visualize existing topography would help reviewers grasp how much cut and fill would need to occur and to identify areas more susceptible to erosion.

ENDANGERED SPECIES ACT COMMENTS

All proposed alternatives are within the range of the federally endangered Indiana bat (*Myotis sodalis*) and federally threatened bald eagle (*Haliaeetus leucocephalus*). All proposed alternatives are also within the historic range of the federally endangered American burying beetle (*Nicrophorus americanus*). Alternatives 3, 4, and 5 are also within the range of the federally endangered fanshell mussel (*Cyprogenia stegaria*) and alternative 5 is within the range of the federally endangered rough pigtoe mussel (*Pleurobema plenum*). Alternatives 1 and 2 are nearest to the most recent records of the fat pocketbook mussel (*Potamilus capax*). 5.17

All new-terrain segments are likely to contain suitable Indiana bat summer habitat at multiple locations, and most segments that follow existing routes will also contain suitable habitat to a lesser extent. Where the actual alignment is placed within the study corridor will have a large bearing on the extent of summer habitat within the proposed right-of-way. In addition to direct impacts on hibernacula (caves), the study must also consider impacts upon karst features and subterranean hydrology, which are connected to hibernacula. 5.17

There are several bald eagle nests on the mainstem and both major forks of the White River. The West Fork White River is also a primary wintering area for this species, and new nests are being discovered along these corridors frequently. All route alternatives, except Alternative 1, pass within 5 miles of an active eagle nest (some much closer). The site of any proposed crossing of the White River that is forested and is not heavily disturbed by an existing major highway or other human activities has the potential to support a future eagle nest. 5.17

The fanshell and rough pigtoe have been found recently in the East Fork White River. The only current pigtoe record is in Martin County; however, recent evidence indicates the fanshell may occur from Lawrence County (below Williams Dam) at least as far downstream as Daviess County. Due to lack of survey information, all of the East Fork and mainstem White River should be considered potential habitat for this species. These waterways also contain populations of several species of fish and mussels listed as endangered by the State of Indiana. 5.17

Alternatives 3, 4, and 5 pass near populations of the copperbelly water snake; *Nerodia erythrogaster neglecta*). This species is federally listed as threatened in the northern part of its range (north of the 40th parallel). However, listing was precluded in southern Indiana by a Conservation Agreement with the coal mining industry. The CWS is of great concern to the FWS because of its specialized habitat requirements and continuing threats from several sources. 5.17

Because all of the build alternatives are likely to have some adverse effects on federally listed species or their habitats, the FWS anticipates that formal consultation under section 7(a)2 of the ESA will be required for this project if a build alternative is selected. If INDOT and FHWA select a build alternative as their preferred alternative, they will need to prepare a biological assessment (BA) to analyze the effects the preferred alternative will have on federally listed species and make an "effects determination." Once this determination has been made, FHWA should submit the BA and determination to the FWS's Bloomington Field Office and request concurrence with the determination or that formal consultation be initiated. If adverse effects are unavoidable, formal consultation is required and would conclude within a maximum of 135 days (unless a time extension was mutually agreed to). As this is a tiered approach, the FWS would issue a Tier 1 biological opinion (BO) and incidental take statement for the preferred alternative. This tier 1 BO will likely be appended to the tier 1 final EIS for the I-69 Evansville to Indianapolis, Indiana, project. Once the tier 1 process is completed, the FWS will continue informal and formal consultation with INDOT/FHWA throughout the tier 2 NEPA process, with tier 2 BOs appended as needed. 5.17

SUMMARY COMMENTS

The Department has significant concerns with the magnitude of the impacts that some of the build alternatives would have on the diverse biological resources in this region of Indiana. Alternative 1 would have far fewer adverse environmental impacts than any of the other "build" alternatives, and we consider it to be the environmentally preferable build alternative. Of the other build alternatives, Alternative 2 has the lowest overall impact to natural resources and is environmentally preferable to Alternatives 3, 4, and 5. Our ranking of the environmental acceptability of these three alternatives, from most to least acceptable is: Alternative 4, Alternative 3, and Alternative 5. We concur with your identification of Alternatives 3A, 5A, and 5B as "non-preferred" alternatives due to

I-8

the severity of their potential impacts on critical, high quality natural areas. For similar reasons, we also believe alternative 3B (and to a lesser extent 3C) should also be considered as a non-preferred alternative and eliminated from further consideration. We recommend the no-build alternative be clearly defined (i.e., define the project baseline) and it be given a level of analysis consistent with that of the build alternatives. The Final EIS should also disclose whether the no-build alternative is either a "preferred" or "non-preferred" alternative (pages S-32 and S-33).

One of the stated purposes of the I-69 project is to support economic development in southwestern Indiana. However, the DEIS fails to depict where potential development is most likely to occur along the alternative routes. The Final EIS should address this issue in a much more comprehensive manner, including assessment of the possible extent of the indirect effects on T&E species and other fish and wildlife resources of reasonably foreseeable growth associated with each alternative.

The Department requests FHWA reevaluate its section 4(f) determination regarding the TSA of the Hoosier National Forest and, in the section 4(f) evaluation portion of the Tier 1 Final EIS, specifically address the applicability/nonapplicability of section 4(f) to the TSA as a refuge or natural preserve. The Evaluation should also provide additional information concerning the management plans for the Morgan/Monroe State Forest and Martin State Forest and specifically address whether the forests, or portions of them, are managed or function as a refuge, natural preserve, or recreation area. Potential proximity impacts, such as increased noise and visual intrusion, of project alternatives on areas determined to be 4(f) resources should be discussed in the Evaluation.

All of the build alternatives are likely to have some adverse effects on federally listed species or their habitats. If INDOT and FHWA select a build alternative as their preferred alternative and if informal consultation with the FWS indicates adverse effects cannot be avoided, formal consultation with the FWS should be requested.

The Department has a continuing interest in working with the FHWA and the INDOT to ensure project impacts to resources of concern to the Department are adequately addressed. For matters related to fish and wildlife resources and federally listed threatened and endangered species, please continue to coordinate with the Field Supervisor, U.S. Fish and Wildlife Service, 620 South Walker Street, Bloomington, Indiana 47403-2121, telephone: 812-334-4261. For matters related to section 4(f) resources and rivers listed on the NRI, please contact Ms. Sue Jennings, National Park Service, Midwest Regional Office, 1709 Jackson Street, Omaha, Nebraska 68102, telephone 402 221-3493.

We appreciate the opportunity to provide these comments and thank the FHWA for its efforts to contact the INDNR/Outdoor Recreation office.

Sincerely,

for Kenneth L. Kaser

Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

cc:

Ms. Janice Osadczuk, Chief
Division of Environment, Planning & Engineering
Indiana Department of Transportation
100 North Senate Avenue, Room N 848
Indianapolis, Indiana 46204

Michael Grovak
Bernardin, Lochmueller & Associates, Inc.
6200 Vogel Road
Evansville, Indiana 47715

Subj: New I-69 Study Form Feedback
Date: 11/7/02 12:56:28 PM EST
From: clherr23@iquest.net (Charles L Lucille C Herr)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Charles L Lucille C Herr
1905 N Riley Road
Muncie, IN 47304

Message:
When I-69 was being constructed back during the 1960's why did it stop at Indianapolis? Did someone drop the ball at that time? I heard or read sometime ago the Represenative from the Evansville district was not present at the continuation of the project meeting. What was the real reason for this stopping at Indianapolis? 1.1
Would appreciate your comments on this. Thank you. C.L. Herr

1107-025 Herr, Charles.wpd

October 23, 2002

Mr. Michael Grovak
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, IN 47715

Dear Mr. Grovak:

After downloading and reading the summary of the Tier 1 DEIS for the proposed I69 corridor and most of the associated impact studies I can say that if it were left to me I would put in a limited access bypass around the east side of Terre Haute, upgrade I 70 to six lanes from Indianapolis to Terre Haute and use the rest of the billion or two to provide low interest loans, tax abatement, training and other services to small businesses in southwestern Indiana. There might even be enough left over to fix and improve some of the existing roads. This, as much as anything that could be done would serve to create good jobs and overall economic development for the region.

The so-called NAFTA route already exists in essence via I69, I70, I57, I55, I40, I35 and I20 or I35. Haggling over a 10 to 20 minute timesavings for alternative 1 vs. 2,3,4 or 5 in Indiana is small potatoes in the overall project. If I69 is really to be a new national road then I would be much happier if someone like the GAO was performing this study rather than an area firm. I do not mean to criticize BL&A specifically but local politics and special interests have an unavoidable influence. We need to determine what will be best for the nation – I believe I'm correct that most of the funding will come from my federal taxes rather than my state taxes; money that I could otherwise use to do my duty as a consumer to spend to prop up the economy or money that could be used to fight a war on terror. 1.4

From what I see in your DEIS, alternatives 2-4 provide the best level of access for rural southwestern Indiana but unfortunately leave Vincennes and Terre Haute high and dry (2 does pick up Vincennes). These two urban areas traditionally have had marginal to blighted economies (I grew up in Terre Haute). Both would be advantaged by route #1. Routes 3 and 5 would best advantage Bloomington but Bloomington is already in the grips of runaway expansion – despite numerous plant closures. Its future seems assured by the presence of Indiana University and the general attractiveness of its locale, amenities and cultural offerings (everything from fishing at Lake Monroe to world class opera at the university). Poverty in the Monroe, Lawrence and Greene county area is not explained solely by lack of opportunity. Certainly increased opportunity would help some and be good in the long run but many of the poor simply lack the skills to hold down a factory job if it were available or have no interest in working at a truck stop or a fast food. If good jobs are available, people will relocate (from Terre Haute and Vincennes?) to fill the need and the unskilled poverty stricken folk will remain poverty stricken. The only difference for them will be that they will now have new neighbors with large expensive houses who will not be happy to see them. These new neighbors will also demand services that will require higher property taxes. Thus the highway may reduce poverty in the area as advertised but it may be as much a result of driving out the poor as actually helping them.

Safety - have you driven I69 between Indianapolis and Fort Wayne? My most recent experience involved being completely boxed in by tractor-trailers for miles. I witnessed the aftermath of at least two serious accidents. Traffic was unrelenting, high speed (except when it stopped dead for no visible reason) and bumper to bumper almost the entire distance. At no time did I feel as safe as I do driving to Bedford via the two lanes. If I69 performs as advertised it will more closely resemble Indianapolis to Fort Wayne than a pleasant drive to Corydon on I64. While on average, interstates are safer than state highways; this is not always true for specific segments. The wide-open visibility along most of the 41 route would seem safer for a large volume of traffic when compared to a route with a lot of terrain variations as I would expect to see on routes 2, 3, 4 & 5. Will the presence of an I69 corridor really reduce the number of accidents in Monroe, Lawrence and Greene Counties? Many of the roads in these counties are inadequate to safely handle the volume of traffic. They are narrow, hilly and curvy. If I69 meets its core goals it will increase the population in these counties. Any money that might have been available to improve the existing roads will have been spent on I69. My personal observation is that the traffic is simply too aggressive for the driving conditions – spend the money on additional enforcement.

1025-033

Costs - per your report, alternative 1 is the least expensive but I don't think that figure included upgrades to I70. To be fair, it should be noted that there is already a project being developed to upgrade I70 and these two should be evaluated together. Is the upgrade proposed for I70 sufficient to accommodate the expected traffic volume for the combined route and if not, what is the incremental cost and environmental impact? That incremental cost and impact (if any) needs to be added into the DEIS for alternative 1. Presently, a lot of people are unaware of the I70 project and have dismissed alternative 1 as unworkable because of the I70 bottleneck. Some also claim that the full expense of an I 70 upgrade needs to be added to alternative 1 but this can't be the case if there are already plans to do the work for other reasons. I don't feel that the DEIS is complete unless the incremental changes to upgrade I70 are analyzed and published. I'm also not sure how the issue of future maintainability was addressed. Is there a figure for average annual maintenance for the different proposals? I note that there are 19 potential bridges for alt. 1 vs. 58-59 for 3C. Terrain variations for 2, 3, 4 and 5 will add complexity as well as drainage and stability issues. Limestone substrate for 2, 3, 4 & 5 will mean dissolution issues. I note that the report summary mentions high maintenance costs for alternatives 3A and 3B but only addresses high construction costs for 3C. Was this a typo or were maintenance costs left out for 3C (which is generally understood to be the politically preferred route)?

Impacts – the report shows that the fewest impacts to farms, woods, wetlands, karst and biota are realized with alternative 1. Further, the greatest likelihood for contaminating groundwater exists along the other alternatives due to the presence of limestone. Routes 2 and 4 may impact McCormick's Creek State Park, one of the jewels of our state park system. Noise from the interstate could seriously impact the enjoyment of the park. Routes 3 and 5 are the most likely to impact karst features (although the karst impacts of route 3 are downplayed in the report) and associated rare and as yet undescribed species. Ongoing work by Dr. Julian Lewis in the Hoosier National Forest is uncovering life systems in the karst region which are barely understood. Route 5 in particular cuts through this study area. I notice a high number of business relocations for #1, did that take into consideration a bypass around the east side of Terre Haute? Such a bypass would largely eliminate impacts to the heavily developed corridor south of town. 5.23

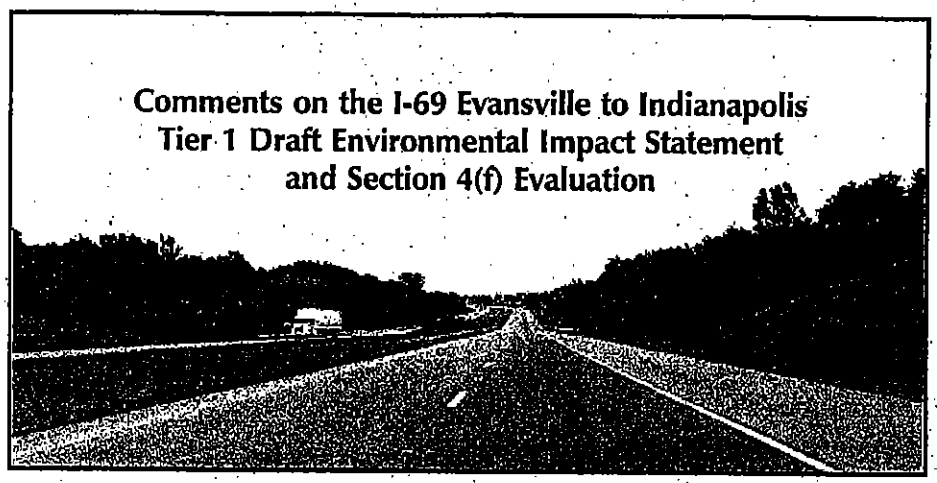
Goals - these goals focus almost entirely on southwestern Indiana but as I've already said highway funding would mostly come from federal dollars and I would like it evaluated from a national perspective. Alternative 1 appears to meet at least one of the three core goals – "Facilitate interstate and international movements of freight..." I note that it says *interstate* and not *intrastate*. Alternative 1 would offer advantages to southeastern Illinois, which also has a marginal rural economy. It also facilitates the link between Evansville and Gary/Chicago and invites the future development of another interstate corridor via 41 and 63 north of Terre Haute. Since Illinois stands to benefit from alternative 1, it would seem reasonable to partner with them to apportion costs for benefits. This would reduce the Indiana tax dollars spent. Is I69 a federal highway or is it still just a southwestern Indiana highway? For perspective, this project was originally started to build an Evansville to Bloomington highway and only became a national route when the public raised too many questions. I suspect that the core goals (some of them unstated) remain the same as for when this was the "Bobby Knight Highway". A small change in the core goals could make a big difference in the results.

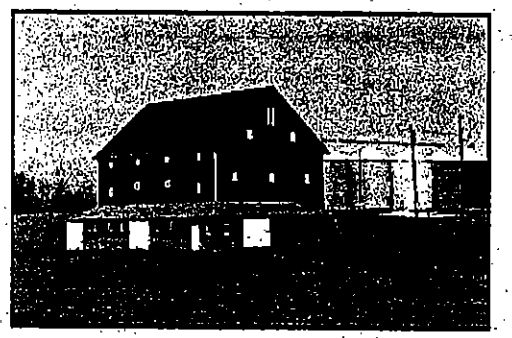
My first choice is covered in the first paragraph. My second is alternative 1 (41/70) A possible compromise could be a variation of alternative 2 if there is a guarantee that the needed work on I70 and the limited access bypass around Terre Haute would be accomplished in a timely fashion and the route would be located far enough from McConnick's Creek SP. The worst route appears to be #5, not only does it detour from the diagonal but it also has the greatest potential environmental and construction costs. I agree that alternative 3 seems to provide the best service to Bloomington but I believe the costs and adverse impacts are far too high given that there is no guarantee of performance or assurance of mitigation.

Thank you for the opportunity to comment.

Richard Vernier
RR2 Box 350
Princeton, IN 47670

Comments on the I-69 Evansville to Indianapolis Tier 1 Draft Environmental Impact Statement and Section 4(f) Evaluation





Environmental Law and Policy Center
Hoosier Environmental Council
Citizens for Appropriate Rural Roads
Citizens Action Coalition of Indiana

November 7, 2002

Cover Photographs (from top to bottom)

1. U.S. 41 between Evansville and Terre Haute (ELPC file photo). This underutilized highway, adaptable to current interstate standards, is the logical, common sense choice for a new Interstate 69.
2. Farm in Southern Indiana (HEC file photo).
3. Hoosier National Forest (Sheldon Garriott). Alternative 5 would run through the Tincher Special Area in the Forest.

1.0 INTRODUCTION AND SUMMARY OF COMMENTS

The Environmental Law and Policy Center, Hoosier Environmental Council, Citizens for Appropriate Rural Roads and Citizens Action Coalition of Indiana (collectively, the "Public Interest Organizations") hereby submit these joint comments on the Indiana Department of Transportation's (INDOT) I-69 Evansville to Indianapolis Tier 1 Draft Environmental Impact Statement & Section 4(f) Evaluation (DEIS) released on July 31, 2002.[1]

INDOT's single-minded desire to build a new-terrain "direct" interstate highway between Evansville and Indianapolis continues to blind the agency to the costs, environmental and community impacts, and lack of factual basis for a new highway. INDOT's "preferred" new terrain highway alternatives are, on average, $600 million (63%) more expensive to construct than Alternative 1 (US 41/I-70), and eight times more expensive to maintain than Alternative 1.[2] The new-terrain alternatives would destroy, on average, 4,600 more acres of farmland and forestland than Alternative 1.[3] And, none of INDOT's preferred alternatives would produce significantly better transportation or economic benefits than either the "no-build" option or Alternative 1. Put another way, INDOT proposes to spend $600 million or more of taxpayer money to save a few minutes of travel time for the predicted 175 additional cars and trucks that might travel between Evansville and Indianapolis each day on a new-terrain highway.[4]

The heart of INDOT's DEIS – the purpose and need statement – reflects INDOT's continuing attempt to create needs where they do not exist, and to invent purposes to fulfill those imaginary needs. For example, the biased purposes "strengthening the transportation network in Southwest Indiana" and "supporting economic development in Southwest Indiana," support INDOT's pre-ordained new-terrain alternative to the detriment of Alternative 1. INDOT's "rigging" of the DEIS in this manner, especially in the face of reasonable alternatives, violates NEPA. 2.1

[1] Unless otherwise specified, the term "INDOT" as used in these comments includes the agency and its contractor for the DEIS, Bernardin Lochmueller and Associates.

[2] DEIS, Table S-5.

[3] DEIS, Table S-6. Average of high and low estimates, including those for indirect impacts, rounded to nearest hundred.

[4] See Section 3.8.2 for an explanation of this estimate.

Remarkably, despite the DEIS' biased purposes and fictional needs, the data in the DEIS do *not* support the construction of an all-new highway. None of the highway alternatives significantly improve upon the "no-build" conditions in virtually all performance categories, notwithstanding INDOT's prejudicial and meaningless use of labels such as "high," "medium," and "low" to explain the modeling results. These data, together with economic and social costs, and environmental impacts, strongly support choosing Alternative 1 – upgrading US 41 between Evansville and Terre Haute and connecting to I-70 to Indianapolis – as the route corridor for I-69. 6.2

Among the other serious flaws in the DEIS are the following:

- INDOT's egregious failure to thoroughly evaluate negative social and economic impacts caused by the construction of a new highway. Communities along US 41 will suffer from lost traffic and business revenues, which will reduce the tax base and therefore reduce government investments and services. Communities in the path of a new-terrain route also will suffer business and social impacts. And Hoosiers throughout the State will suffer as INDOT drains the state budget to pay for a new and unnecessary highway. 5.5

- INDOT's "cooking the books" on comparing different alternatives. The DEIS includes in the "no build" scenario planned improvements along Alternative 1 but not at least one other significant improvement along the "preferred" routes. Consequently, the DEIS *understates* the benefits of Alternative 1, and *overstates* the benefits of certain other routes, which is an unfair and unlawful bias against Alternative 1. 2.3

- INDOT's refusal to release key DEIS background data seriously impeded the public's review of the DEIS. Without this data, Public Interest Organizations and others could not meaningfully comment on many aspects of the DEIS. 11.3

These and other deficiencies are discussed in detail in these comments.

2.0 LEGAL AND POLICY ISSUES

2.1 Tiering

This section explains why INDOT's use of a "tiered" EIS violates NEPA and other laws, impairs the decisionmaking process, and frustrates the public's ability to compare alternatives on the basis of environmental impacts. Public Interest Organizations agree that a tiered process is appropriate under some circumstances. In this case, however, INDOT's estimates of impacts are based on a narrow fictional alignment within a two-mile-wide corridor. INDOT's methodology produces unreliable and misleading results. INDOT instead should have evaluated impacts within the 2,000 feet wide corridor, which would have captured more of the likely environmental impacts than the fictional working alignment allowed a meaningful evaluation of alternatives.

In INDOT "tiered" NEPA review process for this project, the first tier EIS is supposed to address "big picture" issues of feasibility and route corridor, "while taking into account the full range of impacts."[5] INDOT will use second tier studies to determine the highway alignment within the chosen corridor, measure environmental impacts in more detail, and identify environmental mitigation plans.[6]

INDOT's use of the tiering process in this case prevents the public and INDOT from meaningfully comparing the environmental impacts among the different alternatives. INDOT created a very large two-mile wide "Study Band" for each of the alternatives within which it gathered data on environmental conditions, but it did not quantify these impacts for each of the alternatives.[7] Instead, INDOT created a fictional 240 to 470 feet wide "working alignment" within the two-mile Study Band corridor as a proxy for the final highway alignment.[8] This working alignment, which is only about 5% of the width of the 10,560 foot wide Study Band, could be completely different from the actual alignment for many of the segments. As INDOT states, "the Tier 1 EIS is not intended to result in the selection of a specific alignment."[9] A 5.1.1

[5] DEIS, at p. S-3.

[6] DEIS, at pp. S-3 to S-4.

[7] DEIS, at p. 5-2.

[8] DEIS, at p. 5-2.

[9] DEIS, at p. 5-2.

glance at the DEIS Environmental Atlas maps for any of the alternatives shows that environmental impacts vary widely within the Study Bands. In at least one case – for Alternatives 3 and 4 – INDOT presents two different pairs of Study Bands in the vicinity of the city of Washington. Approximately 10 miles separates one of the pairs, making any effort to quantify environmental impacts for even the fictional working alignment impossible. INDOT's "working alignment" fiction therefore is a misleading and practically useless method to estimate the possible range of environmental impacts caused by a new highway, even in a Tier 1 EIS.[10] 5.1.2

After completing this deficient guesstimate of environmental impacts, INDOT proposes to discard all but one of the alternatives and issue a Final EIS and Record of Decision selecting one corridor as the route. Only later – in the Tier 2 studies – and only with respect to the single corridor selected will INDOT examine particular highway alignments and quantify impacts. By that time, with all the alternatives having been eliminated, it may be too late to select a route that avoids serious impacts.

As a matter of *policy*, forgoing meaningful analysis of alternatives through comparison of environmental impacts seriously impairs the decisionmaking process for a project whose outscale potential impacts make good decisionmaking vital. INDOT seeks to justify its shortcut as helping focus attention on "big-picture" issues of feasibility and route.[11] In fact, as NEPA and the CEQ regulations reflect, detailed information about impacts is essential in determining whether I-69 is feasible and in selecting among the alternative routes. To claim otherwise is to deny the obvious. 5.1.2

As a matter of *law*, forgoing this analysis flouts NEPA's central requirement of a detailed examination and comparison of the impacts of all the reasonable alternatives, and undermines NEPA's purpose of integrating information about environmental impacts into key decisions like the selection of a route. In addition to violating NEPA, the DEIS is impermissible on other legal grounds as well:

[10] Since INDOT will not commit to performing an EIS for any of the Tier 2 segments, a realistic and detailed evaluation of impacts in the first-tier analysis is especially important. See DEIS, at pp. 3-55 to 3-58 (list of segments).

[11] DEIS, at p. S-3.

- It violates Council on Environmental Quality regulations. INDOT's approach does not meaningfully compare "the environmental impacts of the proposal and the alternatives" in a way that "sharply defin[es] the issues and provid[es] a clear basis for choice among options."[12] There will be a wide variety of wetlands, prime farmland, residences, streams and other conditions in each of the 2-mile-wide corridors. Limiting the analysis of impacts to a narrow fictional alignment that bears little relationship to reality, essentially makes the choice among route alternatives completely arbitrary instead of providing a "clear basis for choice." 5.1.1

- It cannot be reconciled with Section 404 of the Clean Water Act and EPA's Section 404 Guidelines. Section 404 requires an affirmative determination that the proposed project location constitutes the least environmentally damaging practicable alternative.[13] Unless the impacts of all the reasonable alternatives are quantified, which cannot meaningfully be accomplished looking only at either 2-mile-wide corridors or fictional alignments with those corridors, there will be no basis for making such a determination.[14] 5.25

- It is at odds with the NEPA/404 Merger Agreement among FHWA, US. EPA, the Army Corps of Engineers and the U.S. Fish and Wildlife Service.[15] That Agreement emphasizes the need to collect sound, hard data on various alternatives' impacts on wetlands and other resources. In order to identify the "least damaging practicable alternative available," the Agreement states that "[t]he alternatives analysis needs to explicitly evaluate . . . all the environmental factors for all of the alternatives."[16] That is precisely what INDOT is not doing. 5.25

- It cannot be reconciled with other laws, such as the Farmland Protection Policy Act, Endangered Species Act, Section 4(f) of the Department of Transportation Act and Executive Order 11988. These laws require that the farmland, endangered species, historic preservation and floodplain impacts of alternatives be quantified.[17] None of 5.1.3

[12] 40 C.F.R. § 1502.14.

[13] 40 C.F.R. § 230.10(a).

[14] See Van Abbema v. Fornell, 807 F.2d 633, 642 (7th Cir. 1986) (Army Corps must take "hard look" at alternatives before issuing Section 404 permit).

[15] Concurrent NEPA/404 Processes for Transportation Projects (March 1994), at p. 10.

[16] Id. at pp. 14, 15.

[17] See 7 C.F.R. § 658.4(c)(4) (under FPPA, consideration must be given to alternatives that would destroy less farmland); 16 U.S.C. § 1536(a)(2) and 50 C.F.R. § 402.14 (Section 7 of ESA requires use of "best scientific and commercial data available"; consultation process, to be completed before alternatives are foreclosed, requires concrete data about project location and impacts on listed species; if project may jeopardize listed species, data about alternatives is required as well); 49 U.S.C. § 303(c) and 23 C.F.R. § 771.135(b) (under Section 4(f), historic sites may not be used unless there is no prudent and feasible alternative; 4(f) impacts must be evaluated while alternatives are still under study); 33 C.F.R. § 320.4(j)(3) (E.O. 11988 prohibits authorization of projects impacting floodplains if practicable alternatives exist).

these requirements can be fulfilled by considering alternatives based on narrow fictional alignments within much broader corridors. 5.1.3

2.2 Public Accountability

INDOT's lack of public accountability in the DEIS process violates Indiana law, is unlawfully biased in favor of pre-ordained preferences, and precludes meaningful comparison of alternatives. Although INDOT claims that the DEIS process is an objective analysis that reflects extensive public input, the following examples prove otherwise.

First, in 2000, near the beginning of the new DEIS process, Governor O'Bannon declared that he has supported a "direct" new-terrain route for I-69 for "all my public life."[18] Equally troubling was the Governor's expressed disdain for the NEPA environmental review process that is at the heart of the route selection process: "What would really make me feel good is if we had a Congress that would change those [NEPA] rules and regulations" that, in his view, have unnecessarily delayed selection of the "direct" route.[19] The Governor's public declaration confirmed that the "deal is done" in favor of a new-terrain route for I-69, and the EIS would change nothing. 6.2

A second serious flaw in INDOT's public outreach is the agency's "privatization" of the EIS process, with the resulting "walling off" of key documents and data used to create the DEIS. According to INDOT, the background documents and data are exempt from public review because they are the property of its contractor Bernardin Lochmueller and Associates (BLA). INDOT argues that since BLA is not a public agency, the documents therefore are not "public records" under the Indiana Access to Public Records Act (APRA). (The correspondence related to INDOT's two refusals is at Attachment B of these comments. Also included is FHWA's recent refusal to release the documents under the Freedom of Information Act.)[20] 11.3

[18] See Tamer tone, I-69 talk pave debate, Indianapolis Star, Oct. 13, 2000, at p. D1.

[19] Id.

[20] Although INDOT consistently has taken the position that none of the DEIS support documents are public records, INDOT has given us certain other data in the past, "in order to further the public disclosure objectives of the Indiana Access to Public Records Act and the National Environmental Policy Act." Letter from INDOT to ELPC dated September 6, 2002. Unfortunately, INDOT chose not to consistently apply these sound and legally mandatory objectives.

By denying access to what otherwise would constitute part of the record for the DEIS, INDOT has significantly impeded the public's ability to review, analyze and comment on the DEIS. For example, the Public Interest Organizations wanted to review the digitized Geographical Information System (GIS) "layer" for each of the five different route alternatives. INDOT refused, claiming that the GIS route layer was not INDOT property (even though INDOT had released the other 170 layers to the public). Without the GIS route layer, we could neither confirm the accuracy of INDOT's assessment of environmental conditions nor determine whether less environmentally destructive route corridors were possible. Similarly, INDOT refused our request for performance measure data that compared different route alternatives under INDOT's key "accessibility" criteria. After much time and expense, our consultants managed to recreate some of the withheld accessibility data using other data INDOT provided to our contractor.

INDOT's position that it can maintain blanket secrecy for all of the documents used to create the DEIS violates state law. The Indiana APRA defines a "public record" in relevant part as any document "used" by an Agency.[21] Since INDOT is the official author of the DEIS, and the background documents and data unquestionably were "used" to create the DEIS, INDOT must have "used" the documents at issue, even if BLA, as agent for INDOT, prepared most of the DEIS. 11.3

INDOT's "privatization" of the NEPA process also unlawfully thwarts public review and comment of the DEIS under 40 C.F.R. § 1503.1 and other applicable federal law. INDOT's DEIS contains many conclusions, but does not include most of the background data that informed INDOT's conclusions. INDOT's refusal to provide this data limits our ability to meaningfully comment on the DEIS.

2.3 Failure to Seriously Consider the "No-Build" Alternative

One of NEPA's basic requirements is that INDOT must evaluate the "no-build" alternative.[22] The no-build alternative "provides a benchmark, enabling decision makers to

[21] Indiana Code § 5-14-3-2.

[22] See 40 C.F.R. §§ 1502.14(a); 1508.25(b)(1).

compare the magnitude of environmental effects of the action alternatives."[23] The DEIS, however, largely ignores the no-build alternative, and gives scant attention to its transportation, fiscal, and environmental benefits.

In this case, the no-build alternative deserves more attention because INDOT's own data demonstrates that none of the "build" alternatives perform significantly better than the no-build alternative based on the performance measures.[24] Among other reasons why the no-build alternative performed so well in comparison to the build alternatives is that INDOT's no-build alternative includes hundreds of millions of dollars worth of "committed" [25] road projects that INDOT plans to complete by 2025, including: 2.3

- Added travel lanes to I-70 between Terre Haute and Indianapolis;
- Upgrades of sections of US 231, US 50, SR 62, SR 66, US 41, SR 37, and SR 46; and
- Construction of the Terre Haute Bypass (SR 641) in Vigo County.[26]

These significant improvements to mobility corridors throughout the Study Area likely improved the scoring of the "no-build" alternative in comparison to the build alternatives. Given these significant improvements, INDOT's repeated conclusions in the DEIS alternatives analysis that the no-build alternative yielded no safety or other benefits in comparison to the build alternatives is misleading. The no-build alternative produced significant transportation and economic benefits, but INDOT ignored them.[27] INDOT should have examined to what extent the committed upgrades improved transportation and other relevant performance measures in the Study Area over existing conditions, and compared the benefits of those improvements to the regional benefits, if any, of a new highway. 2.3

[23] Council on Environmental Quality, "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," Question 3, 46 Fed. Reg. 18026, 18027 (1981).

[24] These comments and the comments of Smart Mobility, Inc. address this issue.

[25] INDOT defines "committed" projects as those projects "which are anticipated by INDOT to be built in the near future or for which INDOT has a firm, long-term policy to build." DEIS, at p. 2-9.

[26] DEIS, at p. 2-10.

[27] INDOT's bias against the no-build alternative became clear more than a year ago, in April 2001, when then-Commissioner Klika declared that "I feel confident that alternative will be discarded. There is truly a need." Top state highway official says report on I-69 proves it's needed, Bloomington Hoosier Times, April 22, 2001 (copy at Attachment C of these comments.) Her statement also reveals that INDOT had made up its mind that a new highway met the claimed needs, even though INDOT did not release the DEIS for another 15 months.

2.4 Failure to Perform a Cost-Benefit Analysis

The DEIS failed to perform a cost-benefit analysis for the different alternatives. A cost-benefit analysis would be especially useful to determine whether INDOT could justify spending hundreds of millions of additional dollars on more environmentally, economically, and socially damaging route alternatives. 3.4.1

In 1996, INDOT performed a cost-benefit analysis for the proposed Evansville to Bloomington highway, albeit a crude and inaccurate one.[28] Inexplicably, INDOT did not perform a cost-benefit analysis as part of the new DEIS. A highway should not be built if its economic benefits do not even equal its costs (broadly defined to include all positive and negative economic and social impacts). INDOT should have performed a cost-benefit analysis in that included both the national costs and benefits of a new highway *and* the benefits should take into account the opportunity cost of labor. 3.4.1

INDOT had planned to retain the International Economic Development Council (IEDC – known formerly as the Council for Urban Economic Development) under Task 5.3.2 of the BLA contract to assess the "negative economic impacts of the corridors selected for detailed study in the Tier 1 EIS."[29] INDOT's failure to retain the IEDC for this analysis violates the NEPA requirement to evaluate all impacts of the different route alternatives. 2.3.2

[28] See Appendix A of the 1996 DEIS, a cost-benefit analysis performed by Cambridge Systematics.

[29] See Letter from Steve Cecil (INDOT) to Alexander Ewing (ELPC) (April 12, 2000), at p.1 (copy attached at Attachment D).

3.0 PURPOSE AND NEED

In 2001, INDOT Commissioner Klika described the purpose and need statement as being "like the foundation of a house. You have to take a great deal of care and effort to make sure the foundation of your study is well-constructed."[30] Commissioner Klika was correct; purpose and need is the foundation of the EIS because it largely dictates what alternatives are eliminated and what alternatives are carried forward for detailed study. Therefore, the purpose and need statement must accurately and objectively identify the underlying needs for the project, and INDOT may not state a purpose and need that only the State's preferred alternative can satisfy. Simmons v. U.S. Army Corps of Engineers, 120 F.3d 664, 670 (7th Cir. 1997).

If, as Commissioner Klika said, the purpose and need statement is like the foundation of a house, INDOT's I-69 purpose and need statement should be condemned as flawed and irresponsible engineering incapable of supporting the DEIS. The purpose and need statement strongly reflects the institutional bias for an all-new highway that, as explained above, has controlled INDOT's management of this project since its inception. Since an all-new 150 mile long highway would be more difficult to justify simply for the purpose of connecting Indianapolis and Evansville – the environmental and economic costs far outweigh the benefits – INDOT has invented other purposes to better justify building an all-new highway. These purposes include "strengthen[ing] the transportation network in Southwest Indiana," and "support[ing] economic development in Southwestern Indiana.[31] 2.3

Having chosen broad purposes for the I-69 project, INDOT crafted a purpose and need statement that supports those purposes by falsely portraying Southwestern Indiana as an isolated and impoverished region with serious road safety problems. INDOT therefore has better positioned itself to be able to claim that an all-new highway will best alleviate the claimed conditions. This outcome-controlled "rigging" of purpose and need violates NEPA, which "does not give agencies license to fulfill their own prophesies, whatever the parochial impulses that drive them." Citizens Against Burlington, Inc. v. Busey, 938 F.2d 190, 195 (D.C. Cir. 1991). 2.3

[30] See I-69 Update (April 2001), at p. 1, available at www.i69indyevn.org/BLA.Spring.pdf.

[31] DEIS, at p. 2-1.

A biased purpose and need process turns the NEPA process into an empty charade. Instead of an impartial analysis of various alternatives leading to an informed decision as to the least damaging practicable alternative, INDOT has simply gone through the motions. The conclusion is pre-ordained: INDOT's "preferred alternative" new-terrain routes satisfy the project's skewed purposes and needs more effectively than Alternative 1, the I-70/US 41 route.

3.1 INDOT's Shifting Purpose and Need

I-69 has been delayed for many years because INDOT and FHWA have long refused to acknowledge the only purpose the road is intended to serve: improving the connection between Evansville and Indianapolis. Because an upgraded US 41/I-70 (Alternative 1) serves that purpose as well as INDOT's preferred routes and at much lower cost, INDOT and FHWA repeatedly have concocted different purposes who fulfillment would require a new highway.

For example, in the flawed 1996 DEIS for an Evansville to Bloomington highway, a primary goal of the project was to support economic development throughout Southwestern Indiana and the rest of the state, with a focus on four counties along the proposed new-terrain corridor.[32] By 1997, INDOT had narrowed the purpose of the highway to improving economic development along just the four counties – Gibson, Pike, Daviess and Greene – which would have eliminated the US 41/I-70 route from consideration.[33] 2.3

Then, in 1998, INDOT finally admitted that a "major objective" of the project was connecting Indianapolis and Evansville: Since the US 41/I-70 alternative serves that purpose at much less cost and environmental destruction than a new-terrain route, INDOT added another biased purpose to tilt the scales in favor of a new-terrain route: "Strengthening the entire highway network in southwestern Indiana."[34]

[32] See Draft Environmental Impact Study, Southwest Indiana Highway Corridor (March 27, 1996), at p. vii (excerpts attached at Attachment E).

[33] See Doug Sword, Redefining role of I-69 called key to its future, Evansville Courier, Sept. 28, 1997, at p. A1 (Attachment F).

[34] See INDOT Press Release, True Interstate 69 to Emerge from Expanded Southwest Indiana Highway (Nov. 18, 1998) (Attachment G).

In 1999, INDOT continued the pattern of searching for purposes to justify a new-terrain highway. INDOT's "Transition" document for the expanded EIS identified three major purposes for the project:

1. Strengthening the Highway Network in SW Indiana;
2. Stimulating Economic Growth in SW Indiana; and
3. Completing the Indiana Portion of I-69/Corridor 18.[35]

The new DEIS perpetuates these three purposes, two of which are biased in favor of a largely new highway. For example, in the "Transition" document to the new EIS, INDOT explained that the first purpose – strengthening the highway network – would "provid[e] improved linkages among the existing highway routes in the region."[36] Almost by definition, a new highway creates new "linkages" while upgrading highways only improves existing ones. Moreover, since Alternative 1 has few major western linkages due to its proximity to the Wabash River, this purpose creates a strong bias in favor of a new route and against Alternative 1. 2.3

INDOT also has larded on nine "goals" to support the three purposes for the highway project, including three "core" goals.[37] According to INDOT, the first two core goals support the "improving the transportation network" purpose of the project:

- Improve the transportation linkage between Evansville and Indianapolis (core goal);
- Improve personal accessibility for Southwest Indiana residents (core goal).

The third goal supports the national I-69 corridor purpose:

- Facilitate interstate and international movements of freight through the I-69 corridor, in a manner consistent with the national I-69 policies (core goal).

Economic development is not one of the core goals for the project, which is not surprising given that INDOT's 2001 draft purpose and need statement for the project conceded that "it is not possible to predict with certainty whether a particular project will cause economic development to occur, much less to predict where, how, and when it will occur."[38]

This history of ever-shifting statements of purpose for I-69, and the biased nature of the statements themselves, are evidence that the purposes INDOT asserts do not truly reflect "the underlying purpose and need to which the agency is responding."[39] Rather, they reflect an effort "to contrive a purpose so slender as to define competing 'reasonable alternatives' out of consideration."[40]

3.2 Kentucky's Solution

Public Interest Organizations repeatedly have urged INDOT to choose Alternative 1 because it uses more existing highway corridor than any other alternative, and it is the least environmentally damaging alternative. As INDOT confirmed in the DEIS, Alternative 1 has the fewest adverse environmental impacts and costs much less than the other build alternatives. INDOT, however, places little value on the environmental and economic benefits of using existing highways. In sharp contrast, the Kentucky Transportation Cabinet has identified the following three state goals for I-69:

1. ***Maximize the use of existing parkways;***
2. Serve local industry; and
3. Provide an improved facility for increasing truck traffic.[41]

2.2.2

According to the Kentucky Transportation Cabinet, "[e]nvironmental concerns should be reduced since the majority of corridor improvements will be made within the existing right-of-way or immediately adjacent to the existing parkways."[42] INDOT should have followed Kentucky's example for I-69 and included the goal of upgrading existing roads in the purpose and need statement. Alternative 1 best satisfies these goals because it relies largely on upgrading existing roads, and consequently has the fewest adverse environmental and economic impacts.

[35] INDOT, Southwestern Indiana Transportation Corridor: Transition to Expanded EIS (May 1999), at pp. 6-7 (excerpts at Attachment H).

[36] Id. at p. 6.

[37] See DEIS, at p. S-2.

[38] Draft Purpose and Need Statement (April 17, 2001), at p. 48 (excerpt attached at Attachment I).

[39] 23 C.F.R. § 777.111.

[40] Simmons v. U.S. Army Corps of Engineers, 120 F.3d 664, 666 (7th Cir. 1997).

[41] See KYTC, Strategic Corridor Planning Study for I-69, Eddyville to Henderson Kentucky: Summary Overview, (undated) at p. 3 (emphasis added), copy at Attachment J.

[42] Id. at p.5.

3.3 Federal Legislation and Policies

National Highway System (NHS) requirements, which help to guide the decision-making process for new highway projects, support upgrading existing roads as the best solution to the I-69 project. The DEIS, however, does not discuss the significance of these requirements. For example, one criterion for adding a highway to the NHS requires that INDOT assess whether modifications to the existing NHS routes may be preferable to new highway construction (criterion 7).[43] This criterion strongly supports the selection of Alternative 1, since both US 41 and I-70 are part of the NHS. INDOT also is required to evaluate the effects of adding a new NHS route on existing NHS routes -- such as US 41 -- that are in close proximity (criterion 6). 2.2.1

3.4 Indiana Transportation Policies

Apart from a cursory discussion in Section 2.2.2.2 of the DEIS, INDOT fails to explain the relevance of the State's transportation policies to the project. The *INDOT 2000 – 2025 Long Range Plan* (Long-Range Plan) identifies several key policies that strongly support the choice of upgrading U.S. 41 and connecting to existing I-70 rather than building an expensive and harmful all-new highway, and using the savings for targeted road improvements throughout the State.[44] These policies, and the reasons why they support improving existing infrastructure, include: 2.3.2

- ***Transportation System Effectiveness*** is best served by maintaining and upgrading the network of ***existing*** National Highway System roads in Indiana, and targeting safety "hot spots" for improvements. Building a single expensive all-new highway that drains the State budget is the least likely option to achieve a robust, well-integrated system. 2.3.2

- ***Economic Development*** is most effectively and efficiently achieved through upgrading existing roads to Twenty-First Century highway standards, eliminating safety hazards on roads throughout the State, and otherwise developing both highway and non-highway alternatives. Spending substantially more than a billion dollars on a single all-new interstate, in contrast, squanders State and federal money, and, as explained later in this document, will not improve overall economic conditions in Southwestern Indiana. 2.3.2

[43] 23 CFR Part 470, Appendix D.

[44] See INDOT 2000-2025 Long Range Plan (March 2002), at pp. 2-3 (excerpts at Attachment K).

- ***Natural Environment and Energy.*** The 1995 Long-Range Plan commits INDOT to establishing a transportation system that protects the environment. Building any all-new highway that destroys thousands of acres of prime farmland and forests, harms communities, and exacerbates urban sprawl obviously is incompatible with this policy. In contrast, upgrading U.S. 41 to interstate status and connecting to I-70 around Terre Haute minimizes environmental impacts. 2.2.2

3.5 Omission of the Indianapolis MSA

INDOT arbitrarily omitted data from the Indianapolis Metropolitan Statistical Area (MSA) counties (Marion, Hendricks, Johnson, and Morgan) in key economic categories, even though these counties are in the Study Area. INDOT excluded data from these counties on population trends, employment trends, and personal income, which unfairly skews downward the data in these categories for the Study Area. By so doing, INDOT has made the Study Area's economy appear worse than reality, which reflects INDOT's biased effort to misrepresent conditions within the Study Area. 2.3.2

INDOT does not explain why it omitted these counties. INDOT could not have excluded them on the basis of size, since Monroe, Vigo, and Vanderburgh Counties all are either larger than or comparable in size to Morgan, Hendricks, and Johnson counties, which are in the Indianapolis MSA and the Study Area. Since there is no valid reason to exclude the Indianapolis MSA county data from the DEIS, and INDOT has not offered any reason, excluding the data violates NEPA.

3.6 Transportation Needs in Southwestern Indiana

INDOT's own data demonstrates that the DEIS significantly overstates transportation needs for both Evansville and Southwestern Indiana in general. INDOT claims in the DEIS that, "due to extremely poor transportation connections to the north, the [Evansville] region is economically and socially isolated from the rest of Indiana."[45] INDOT's Long Range Plan contradicts this claim, and specifically rebuts INDOT's identified need for a mobility corridor connecting Evansville, Bloomington, and Indianapolis. According to the Long-Range Plan, 2.3.1

[45] INDOT, Economic Impact Summary Report (Task 6.7.4), at p. 20. INDOT did not release this important report to the public for review until September 27, 2002, which precluded meaningful review of the document.

Evansville ranks squarely in the middle of inter-city connectivity for the existing highway system. The following chart summarizes INDOT's inter-city connectivity rankings:[46]

Table 1

CURRENT INDIANA HIGHWAY SYSTEM
MOBILITY LEVELS (INTER-CITY CONNECTIVITY)

Near Ideal Mobility	Average Mobility		Deficiency in Mobility
1. Indianapolis	3. Lafayette	8. South Bend/Elkhart	12. Marion
2. Northwest Indiana	4. Columbus	9. Bloomington	13. Kokomo
	5. Fort Wayne	10. Richmond	14. Muncie
	6. Terre Haute	11. Anderson	
	7. *Evansville*		

2.3.1

Also according to INDOT's data, Evansville's connectivity to Indianapolis is "average," comparable to Kokomo's and South Bend's connection to Indianapolis. INDOT used the same straight-line travel time analysis that it used in the DEIS to evaluate inter-city connections, in which INDOT identifies a ratio of actual travel time to ideal travel time. According to the Long Range Plan, "inter-city connectivity performance provides the basis for the development of the multi-tiered corridor concept of the Statewide Mobility Corridor System."[47] The data in the Long-Range Plan seriously undermine INDOT's claim that Evansville is isolated from the rest of the state.

3.7 Evansville to Indianapolis Connection

One of the purposes and core goals of the I-69 project is to improve the connection between Evansville and Indianapolis. INDOT's attempt to justify a new highway based on this goal is flawed for at least three reasons.

1. INDOT's analysis of this goal – which is based largely on a "straight-line" measurement technique – supports the pre-ordained conclusion that only the straightest, shortest possible highway will meet the perceived need. This outcome-based analysis violates NEPA. 2.3.1

[46] Source: Long Range Plan, Executive Summary, at p.3 (Attachment K).

[47] Id.

2. Very little need exists to improve the road connection between Evansville and Indianapolis. According to INDOT's own data, assuming that the shortest possible highway would meet the need, only about 700 cars and trucks would travel from metropolitan Evansville and metropolitan Indianapolis each day in 2025, which is less than one-tenth of one percent of total vehicular trips from Evansville.

3. Even if INDOT could justify building a new highway on the basis of so few trips (and INDOT cannot do so), INDOT's data also demonstrates that building a new highway will not generate significant additional travel between the two towns. Even the fastest new-terrain route (Route 3B) will generate only 210 additional car trips between Evansville and Indianapolis per day over the no-build scenario.

Given these conclusions, which are based on INDOT's own data, neither the facts nor the law support INDOT's choice of the "preferred alternatives" in the DEIS.

3.7.1 "Rigging" the Evansville-to-Indianapolis Goal

INDOT's principal quantitative basis for improving the connection between Evansville and Indianapolis is the "straight-line" analysis, in which INDOT compares the theoretical travel distance and time between Evansville and Indianapolis with the actual travel distance and time.[48] INDOT used the results of these measurements as the basis for scoring the route alternatives on the Evansville to Indianapolis connection.[49]

The principal flaw with INDOT's straight-line analysis is that it is a proposed solution masquerading as a need. INDOT's analysis compares straight-line travel distance with roadway distance. The only way to make the roadway distance approach the straight line distance is to build a new, straighter road. Smart Mobility's Comments on the DEIS, included at Attachment A, address this issue in more detail.

I-69's alignment between Indianapolis and Port Huron demonstrates the flimsiness of INDOT's argument. As Smart Mobility reports in its comments, the straight line distance between Indianapolis and Port Huron is 290 miles. The distance along I-69 is 366 miles; therefore, the ratio of the distances is 0.79, which is less than the ratio of 0.81 reported for 2.3.1

[48] See DEIS, at pp. 2-11 to 2-13.

[49] E.g., DEIS, at p. S-19 (listing the performance of the alternatives on project goals).

Alternative 1 in the DEIS.[50] No one is suggesting that Indiana and Michigan construct a new I-69 segment to improve the "mileage linkage" index between the two cities, yet that is exactly what INDOT's analysis would suggest. INDOT's rigging of this purpose violates NEPA.

Figure 2.3 in the DEIS, which illustrates the Mobility Corridors, confirms INDOT's bias. This figure includes a dashed line representing a high-speed "Mobility Corridor" connecting Indianapolis, Bloomington, and Evansville. INDOT's explanation for the line confirms our belief that INDOT remains committed to a new-terrain route through the Bloomington area: "The dashed line shown in Figure 2.3 reflects a Mobility Corridor *connecting Evansville, Bloomington, and Indianapolis*. A dashed line was used because no specific alignment has been determined."[51] INDOT's statement underscores INDOT's predisposition towards a new-terrain highway that passes near Bloomington.

3.7.2 Very Few People Travel Between Indianapolis and Evansville

The fundamental question left unanswered in the DEIS is how many vehicles actually would travel from Evansville to Indianapolis (and from Indianapolis to Evansville) using any of the proposed alternatives in the Forecast Year of 2025. INDOT's identification of the Evansville-Indianapolis goal assumes that demand exists, yet INDOT never discusses expected travel levels between the two cities.

Public Interest Organizations' transportation consultants Smart Mobility answered this question, *using INDOT's own data*; no new modeling was necessary. Smart Mobility used Alternatives 1 and 3B for comparison to the no-build alternative because those two routes have the greatest difference in total length (154-156 miles for Alternative 1, and 140-143 miles for Alternative 3B.) Table 2 summarizes Smart Mobility's findings for the Forecast Year of 2025:

[50] See DEIS, Table 2.1, at p. 2-21.

[51] See DEIS, at p. 2-7 (emphasis added).

Table 2

Travel Originating from the Evansville Area

Vehicle Class	Destination	No-build	Alternative 1	Alternative 3B
Cars/SUVs	All Destinations	563,658	565,224	568,671
	Indianapolis Only	208 (0.037% of all trips)	225 (0.04%)	313 (0.056%)
Trucks	All Destinations	8,180	8,185	8,197
	Indianapolis Only	42 (0.51%)	42 (0.51%)	42 (0.51%)

Travel Originating from the Indianapolis Area

Vehicle Class	Destination	No-build	Alternative 1	Alternative 3B
Cars/SUVs	All Destinations	3,097,360	3,097,508	3,099,257
	Evansville Only	207 (0.007% of all trips)	226 (0.007%)	313 (0.01%)
Trucks	All Destinations	42,296	42,226	42,242
	Evansville Only	42 (0.1%)	41 (0.1%)	41 (0.1%)

Note: We generously included all travel within a 20- mile radius from the center of each of the two cities. All values are for travel predicted to occur in 2025, derived from INDOT's travel demand model.

These data reveal two striking facts about travel patterns between the two cities:

1. Total vehicular trips between Evansville and Indianapolis represent less than one-tenth of one percent of all trips originating within a 20-mile radius of either city – only about 355 vehicles in each direction under Alternative 3B.

2. Alternative 3B only generates 175 additional trips between the two cities compared with Alternative 1, even though these two alternatives have the greatest difference in total length. The negligible difference sharply contrasts with INDOT's misleading conclusion that Alternative 3B has "high" travel time savings and Alternative 1 has "low" travel time savings.[52] Neither of the build alternatives substantially increases vehicle travel between the two cities in comparison to total vehicle trips from each city, or in comparison to total traffic on the new interstate. 2.3.1

These facts undermine INDOT's claimed need for an improved connection between the two cities. Whether measured in absolute numbers or percentages, very few trucks and cars will travel between Evansville and Indianapolis in 2025 regardless of the alternative.

[52] See DEIS Table 3-35, at p. 3-54.

3.7.3 The No-Build Alternative Performs Well

These data also reveal that the no-build alternative scores very well compared to the two build alternatives, which is because no real need exists to improve the connection between the two cities. Even if a need existed (which it does not), the build alternatives do not achieve the stated purpose.

3.8 Personal Accessibility

Improving personal accessibility is another purpose and core goal of the I-69 project. A basic flaw with this goal is that the underlying assumption – "Southwest Indiana is significantly less accessible than the rest of the State"[53] – is overstated and therefore misleading. The calculated accessibility is lower in Southwest Indiana than for the State as a whole primarily because population – and therefore employment – are lower in the region. Lower population and employment translate into fewer urban areas, major airports, and universities. *The calculated accessibility for Southwest Indiana will continue to be lower in comparison to the rest of the state regardless of the transportation system.* The attached comments of Smart Mobility confirm that constructing a new highway will not meaningfully improve the inter-regional accessibility of Southwestern Indiana. 2.3.1

3.8.1 A New Interstate Will Not Improve Personal Accessibility

INDOT measured Southwestern Indiana's relative accessibility to Population Centers, Employment, Urban Areas, Major Airports, and Institutions of Higher Education.[54] In each case, INDOT concluded that Southwestern Indiana is less accessible than other areas of the State.[55] Based on this analysis, INDOT determined that "there is a need for increased accessibility within Southwest Indiana."[56] Remarkably, however, INDOT did not ask the next question, which is "how would a new highway (or other transportation mode) improve Southwestern Indiana's

[53] DEIS, at p. 2-19.

[54] DEIS, at p. 2-15.

[55] DEIS, at p. 2-15.

[56] DEIS, at p. 2-19.

accessibility with respect to each of these measures?" As explained below, the answer is "very little, if at all."

To answer this question, ELPC first requested INDOT's analysis of each of the alternatives for each performance measure in a request under the Indiana Access to Public Records Act. (ELPC's consultant Smart Mobility had reason to believe that INDOT had performed the comparative analysis for each route alternative because of coding inside the data files previously provided by INDOT.) INDOT, however, refused the request on the grounds that the data were not "public records" under state law.

Although INDOT unlawfully refused our request for this important data, Smart Mobility was able to independently analyze, at least in part, data that it had received earlier from INDOT. Smart Mobility discusses this analysis, including the necessary limitations caused by INDOT's refusal to provide the "official" data, in its report attached to these comments. Smart Mobility concluded that *even the best-performing alternatives* for each measure of accessibility produced only negligible improvements to regional accessibility.

Smart Mobility's analysis of INDOT's data demonstrates that even if improving inter-regional accessibility were possible in the ways INDOT describes, building a new highway will not accomplish that purpose. That conclusion should not be surprising, since Southwest Indiana already has many uncongested roads and highways that provide inter-city connectivity. 2.3.1

3.9 Traffic Congestion

INDOT correctly concluded that the "highway network is generally *less* congested in the Study Area than in the state as a whole," and that rural and urban interstates are more congested elsewhere than in the Study Area.[57] Even by 2025 the areas of major congestion are concentrated in the Indianapolis metropolitan area, which already has many miles of interstates.[58] The DEIS demonstrates that interstates typically do not relieve traffic congestion in the long run: Marion County has more miles of interstate than any other county in the State, yet INDOT

[57] DEIS, at p. 2-21.

[58] DEIS, Table 2-3, at p. 2-20. INDOT projects a growth rate of 0.43 percent in vehicle miles traveled (VMT) in the Study Area, excluding the Indianapolis MSA, compared to 0.78 percent for the entire State.

predicts that it will be highly congested by 2025. For these reasons, reducing congestion is not a major problem, and in any case the build alternatives do not significantly improve upon what little congestion exists outside of the metropolitan Indianapolis area.

3.10 Safety

INDOT's safety analysis in the DEIS is incomprehensible for several reasons. First, INDOT uses different data in contradictory ways. In Section 2 of the DEIS, INDOT argues that using data on accident *numbers* is wrong; INDOT explains that "standard engineering practice" is to use accident *rate* data, which accounts for different traffic volumes in ways that total accident numbers would not do.[59] INDOT also explained that using *rate* data "provides a baseline for evaluating safety improvements that could be achieved by each of the build alternatives."[60] Yet in Section 3 of the DEIS, INDOT uses accident *numbers*, rather than *rates*, to evaluate the alternatives,[61] which is exactly what INDOT said it would not do, and which INDOT says contradicts "standard engineering practice.".[62] 2.3.1

Second, INDOT's *conclusions* regarding the safety data are misleading. INDOT inflated the apparent significance of all of the safety reductions by failing to include baseline data for either the Study Area or the entire State. In 1996 (the last year for which statewide fatality information is easily obtainable), 982 persons died on Indiana roads.[63] The highest reduction in the number of annual deaths INDOT predicts will occur is seven. Seven is only seven tenths of one percent of a reduction over the baseline no-build scenario, which hardly represents, as INDOT claims, a significant reduction in crashes.[64] 3.4.3

[59] DEIS, at p. 2-23.

[60] DEIS, at p. 2-23.

[61] DEIS, pp. 3-36 to 3-38.

[62] More specifically, INDOT cannot decide the implications of its position. In Section 2 of the DEIS, INDOT explained that "urban interstates in Marion County have high crash rates. This is partially attributable to the fact that traffic volumes on interstate highways in Marion County are much higher than in most other urban areas in Indiana." DEIS, at p. 2-23. Either crash rates are more appropriate than accident numbers, or they are not, but INDOT's explanation for the higher rates in Marion County undermines its justification for using crash rates instead of total accidents.

[63] The Indiana Factbook 1998-1999 (1998), at p. 123.

[64] DEIS, at p. 3-36.

INDOT's failure to include the baseline safety data also infects the comparison among alternatives. For example, INDOT claims that Route 3B would result in seven fewer fatalities than the no-build alternative, while Route 1 would result in five fewer annual deaths than no-build.[65] Based on this two-person difference, INDOT concludes that the Route 3B reduction represents a "*much higher reduction*" than Route 1 (and other alternatives that use I-70 for a portion of travel.)[66] In reality, however, and using the 982 annual fatalities as the benchmark, the two person difference represents only two-tenths of a percent reduction in total highway fatalities. Smart Mobility's review of safety data discusses INDOT's misleading safety analysis in more detail.

A third flaw in the safety analysis is that the DEIS fails to explain whether INDOT could achieve its safety goal for the project – to reduce crash risk -- by other practicable alternatives. For example, Transportation System Management (TSM) programs often are a very cost-effective solution to reducing congestion and accidents. INDOT hopes that its TRAFFICWISE TSM program will reduce accidents in the area of use by 10 to 25 percent.[67] Targeted installation of traffic lights, safety improvements along existing roads, and other upgrades in both Southwest Indiana and across the State are likely to reduce accident numbers and rates far more than the minor improvements INDOT claims for any of the build alternatives, and at far less cost. 2.3.1

A fourth flaw in INDOT's safety analysis is that the general conclusion - interstates are safer than 4-lane divided highways with partial access control and 2-lane roads – proves too much.[68] Assuming that this conclusion is true in Indiana (INDOT's only data is an FHWA report that apparently is not based on accident rates in Indiana[69]), it supports building interstates everywhere in the State to reduce the accident rates. INDOT has not made any showing that the miniscule safety improvements for any of the alternatives are worth the enormous cost of a new highway. 2.3.1

[65] DEIS, at p. 3-38, Table 3-9.

[66] DEIS, at p. 3-36 (emphasis added).

[67] See www.state.in.us/dot/pubs/2001annualreport/Intelligent_Transportation_Systems.pdf.

[68] See DEIS, at p. 2-23.

[69] See DEIS, Table 2-5, at p. 2-23.

A fifth flaw in the safety analysis is that INDOT's review of accident statistics uses only a three-year time period (1996 to 1998). Using only three years of data (whether the data are numbers or rates) renders the analysis statistically invalid. High or low numbers in such a short period of time can drive averages higher or lower, thereby resulting in an incomplete and inaccurate analysis. We used a more reasonable eleven year period (1986 to 1996) to evaluate safety data, which produces a more accurate evaluation of conditions. For example, in Knox County, the average annual number of fatalities in one three-year period within the 1986 to 1996 data set was 4, and in another three-year period it was 11. However, over the entire eleven year period the average annual figure was 7.5.[70] 2.3.1

The difference between INDOT's limited data and more representative data is striking. For example:

- INDOT claims that "In terms of the percentage of serious crashes which involve fatalities, Orange County had the highest percentage in Indiana."[71] In fact, over the more representative eleven year period from 1986 to 1996, *Orange County averaged only 3 deaths per year, one of the lowest fatality rates in the entire State.*[72] 2.3.1
- INDOT's statement that "there is a 'band' of counties with poor safety records in the middle of the Study Area" is wrong.[73] Long-term data show that these counties, including Knox, Daviess, and Martin counties, have similar average data as other State regions.[74]

As these data show:

- The number of accidents is no greater in the Study Area than elsewhere in the State;
- Rural counties in Southwestern Indiana had fewer fatalities than other comparable areas in the State; 2.3.1
- The most highway deaths occurred in more populous urban areas.

[70] Indiana Factbook 1998-1999 (1998), at p. 123.

[71] DEIS, at p. 2-24.

[72] Indiana Factbook 1998-1999 (1998), at p. 123.

[73] DEIS, at p. 2-24.

[74] Indiana Factbook 1998-1999 (1998), at p. 123.

INDOT's conclusion that there is a significant safety problem in the Study Area therefore is invalid. 2.3.1

3.11 Economic Conditions in Southwestern Indiana

The DEIS falsely depicts Southwest Indiana as economically disadvantaged in comparison to other regions in the State. The obvious inference is that a new highway would improve conditions. As we explain below, INDOT's analysis is misleading and incomplete because:

1. A more complete and representative evaluation of economic conditions would reveal that the rural counties are doing well for rural counties (especially those outside of the US 41 corridor). Moreover, the urban counties (for example, Marion) suffer from their own social and economic challenges.
2. Counties along the US 41 corridor are in relatively worse economic shape than other counties in Southwestern Indiana, and traffic diversions away from those counties, which would occur if INDOT selects Alternatives 2, 3, or 4, would worsen their economic situation even more.

INDOT's analysis of the economic indicators discussed below, as well as others in the DEIS, fails to demonstrate that a new highway will improve the indicators. Even if a highway were to improve the indicators, INDOT has failed to show that a highway alternative is a cost-effective way to improve them. INDOT's analysis therefore violates NEPA. 2.3.2

3.11.1 Economic "Stress"

INDOT's needs assessment relies heavily on a U.S. Department of Agriculture (USDA) report entitled *USDA Rural Development – Indiana Strategic Plan FY 2002*. Remarkably, the report's authors acknowledge that it does *not* accurately detail conditions in the area: *"Because we recognize that this data is limited in terms of what it can tell us about the vitality of an area, we have begun gathering more detailed information on Indiana rural communities through 'Community Assessment Visits.'"*[75] Given this statement, INDOT's heavy reliance on the report is misplaced. INDOT should not use the USDA report as the basis for any conclusions in the DEIS. 2.3.2

[75] USDA Rural Development – Indiana Strategic Plan FY 2002, at p. 18.

More fundamentally, INDOT's use of the USDA report reflects an institutional prejudice against rural counties, based on the subjective assumption that an urban county is the preferred economic and social environment. A number of the USDA report's indicators reflect differing circumstances for rural versus urban environments, and do not indicate problems. *These indicators have no bearing on economic conditions.* For example, the report considers water wells and septic tank systems to be indicators of a stressed environment, even though their existence has nothing to do with individual economic circumstances, and they are simply part of the rural lifestyle. In fact, in more relevant indicators, such as higher education,[76] dropout rates,[77] and child care availability,[78] Southwestern Indiana is doing as well as or better than the rest of Indiana. 2.3.2

INDOT's use of the USDA report is misleading for other reasons as well. According to the report, Owen County is one of the most "stressed" counties in Indiana, yet, according to INDOT's data, Vigo County -- which also is in the Study Area -- has a higher poverty rate.[79] For a more accurate comparison, INDOT should have compared rural counties within the Study Area to rural counties in the rest of the State. If INDOT had performed this simple analysis, it would have found that Southwestern Indiana rural counties are no more "stressed" than rural counties elsewhere in the State, including those along interstate highways. 2.3.2

3.11.2 Population Trends

According to INDOT, Indiana's population growth has lagged behind the rest of the United States. Between 1960 and 2000, the United States population grew at an annual rate of 0.80%, while Indiana's rate grew at only 0.40%.[80] Southwestern Indiana's population growth -- outside of the Indianapolis MSA -- "has lagged behind even the rest of Indiana."[81] Yet the difference between the growth rates is miniscule -- 0.40% for the State versus 0.37% for the Study Area outside of the Indianapolis MSA. This gap of only 0.03% is even less than the one-tenth of one percent gap reported in INDOT's 2001 draft Purpose and Need statement for I-69.[82] If INDOT had included the Indianapolis MSA data in its analysis, the growth rate likely would have been larger than for the State as a whole. 2.3.2

INDOT uses these data to argue that "[a] low rate of population growth compared to the other parts of the United States is an indicator of the lack of economic opportunity, suggesting that many individuals are relocating to other areas where economic opportunity is greater."[83] Notably, INDOT did not support this conclusory statement with any facts. Even if INDOT's assumption is correct, INDOT has not demonstrated that building a new highway would improve population growth in the Study Area, which as INDOT concedes, is virtually the same as the rest of Indiana. 2.3.2

INDOT's population discussion also is flawed because INDOT itself can't decide whether rapid growth is good. The USDA report, cited favorably by INDOT, considers rapid population growth to be an indicator of stress,[84] whereas, as noted above, INDOT considers rapid growth to be a prerequisite for economic opportunity. Thus, the USDA report contradicts INDOT's own assumptions. 2.3.2

Fourth, even if INDOT's premise were correct that rapid population growth is needed for economic development, the data supports the conclusion that the Study Area is doing well. According to the 2000 census data[85]: 2.3.2

- 7 of the top 20 growth counties are in the Study Area, which is more than in any other region of the State.
- Owen County, with a 26.1 percent increase, is the fourth-fastest-growing county in the State.

[76] http://www.stats.indiana.edu/web/county/highered00.html.

[77] http://www.stats.indiana.edu/web/county/drpoutrt99.html.

[78] http://www.stats.indiana.edu/web/county/daycare00.html.

[79] See DEIS, at p. 2-29, Table 2-8.

[80] DEIS, at p. 2-26.

[81] DEIS, at p. 2-26.

[82] See Draft Purpose and Need Statement, at p. 41 (Attachment 1).

[83] DEIS, at p. 2-26.

[84] For example, Martin County, which had zero percent population growth during 1990-2000, and Perry County, which lost population, both score high in the population category in the USDA report, since the USDA considers moderate population growth to be less stressful than rapid population growth.

[85] www.stats.indiana.edu/c2k/c2kframe.html (select Topic "Population").

- Only 4 of the 17 counties in the State that lost population or grew by less than one percent are in the Study Area (Knox, Perry, Martin, and Vigo), and 2 of those counties -- Perry and Vigo -- are on interstate highways. 2.3.2

Thus, the Study Area is growing at essentially the same rate as Indiana as a whole and faster than in some areas of the State.

3.11.3 Employment Trends

A good example of INDOT's pattern of misleading conclusions in the DEIS is the following sentence, which introduces INDOT's discussion of employment trends: "Another indication of the lack of economic opportunity is the lower rates of job growth in the Study Area."[86] In truth, INDOT conceded in the same paragraph that employment growth in the Study Area (excluding the Indianapolis MSA), actually grew at a *higher* rate than Indiana as a whole -- 1.17% annual growth versus 1.12% -- between 1974 and 2000.[87] This data flatly contradicts INDOT's claim that the Study Area has "lower rates of job growth." Had INDOT included the four Indianapolis MSA counties in its calculations, the employment growth rate likely would have been even better than for the State as a whole. (Another example of INDOT's institutional bias is that DEIS Figure 2-23 erroneously shows lower employment growth in the Study Area compared to the rest of Indiana, when the reverse is true.) 2.3.2 2.3.2

Equally impressive is that unemployment dropped more in the Study Area than in any other region in the State between 1990 and 2000. Of the 43 counties that experienced at least a 50% drop in the unemployment rate, 18 were in the Study Area.[88] 2.3.2

The county-level 2001 employment rate ranged widely across the state. Eleven of the 25 counties with the lowest unemployment rate were in the Study Area.[89] Six of the 25 counties with the highest unemployment rate were in the Study area.[90] Therefore, INDOT cannot 2.3.2

[86] DEIS, at p. 2-27.
[87] DEIS at p. 2-27.
[88] See www.stats.indiana.edu.
[89] See www.stats.indiana.edu.
[90] See www.stats.indiana.edu.

plausibly argue that economic conditions throughout the entire Study Area are worse than elsewhere in the State. 2.3.2

The DEIS also claims that the Study Area is suffering from low employment rates in the "fastest-growing industries", even though the rates are virtually the same as the entire state.[91] According to the DEIS, the rate of employment in the 20 fastest-growing industries is "about the same percentage" both statewide and in the Study Area (excluding the Indianapolis MSA).[92] Again, INDOT's attempt to portray Southwestern Indiana as uniquely depressed compared to the rest of the State is inaccurate and misleading. 2.3.2

Another flaw in INDOT's explanation is that there is no correlation made between interstates and growth in the "fastest-growing" industries. Most of the listed industries -- for example, motion pictures, securities and commodities brokers, museums, botanical gardens -- do not require interstates for growth and success. *And, none of the industries listed in the IEDC report (see below) that value transportation are included in the "top 20" rapidly growing industries listed in the DEIS.* 2.3.2

3.11.4 Personal Income

The DEIS asserts that "the Study Area (outside of the Indianapolis MSA) lagged behind both the United States and Indiana (outside of the Indianapolis MSA) in per capita personal income" (PCPI)[93] INDOT's exclusion of four counties within the Study Area -- Marion, Morgan, Hendricks, and Johnson -- unfairly and unlawfully skews the per capita personal income (PCPI) downward. Including the Indianapolis MSA would have raised the PCPI for the Study Area, and also would have accurately portrayed the entire area. 2.3.2

Equally important, PCPI data demonstrates that the Study Area is doing better in some categories than other regions of the State, and is keeping pace in other categories:

[91] DEIS, at p. 2-27.
[92] DEIS, at p. 2-28.
[93] DEIS, at p. 2-28.

- From 1969 to 1998, 9 of the 20 counties in the State with the best improvement in PCPI were in the Study Area (excluding the Indianapolis MSA).[94]
- In 1998, 8 of the top 20 counties in PCPI were in the Study Area, which is more than any other region of the State.[95]
- The Study Area has approximately the same percentage of counties in the State in the lowest 20 for PCPI (31 percent) as the percentage of counties in the State that comprise the Study Area (30 percent), thereby indicating that Southwestern Indiana is not uniquely disadvantaged.

2.3.2

3.11.5 Poverty

The DEIS' cursory discussion of poverty levels in the Study Area relies entirely on the USDA study, which, as explained above, is inaccurate and therefore misleading. More fundamentally, by including a section on poverty levels in the DEIS, INDOT implies that a new interstate highway would reduce those levels. The evidence in Indiana is to the contrary. Southwestern Indiana has relatively few people in poverty, and poverty levels in the more populous urban areas are much higher than in rural areas. According to the data:

- 4 of the 12 counties identified with high poverty rates in Table 2-8 of the DEIS (page 2-29) (Crawford, Vanderburgh, Marion and Clay) are located on an interstate.
- Counties along existing I-69 have more people at the poverty level than in other areas.
- Marion County, which has more miles of interstate than any other county in Indiana, also has more people at the poverty level than the rest of the Study Area combined.[96]

2.3.2

3.11.6 Economic Conditions Along U.S. 41

A new-terrain I-69 would harm counties along US 41 -- Vigo, Sullivan and Knox – that are in worse economic straits than other counties in Southwestern Indiana. The US 41 counties would lose travelers and economic activity if INDOT selects one of the new-terrain alternatives.[97]

Recent U.S. Census data demonstrates dramatically that Vigo, Sullivan and Knox counties are already doing worse economically than the "new-terrain counties" -- Greene, Daviess and Pike. According to the figures available as of September 2002:

- The US 41 counties are growing more slowly. Between 1990 and 2000, the US 41 counties grew in population by a total of only 1.1%. The new-terrain counties grew by 7.6%, more than six times faster.[98]
- Poverty is worse in the US 41 counties. The US 41 counties have over 2½ times as many poor people as the new-terrain counties.[99] Among Indiana's 92 counties, the US 41 counties have the second, third and fifth highest poverty rates.
- The US 41 counties have over twice as many unemployed people. The US 41 counties have 4,130 unemployed people. The new-terrain counties have 1,860. Terre Haute has the second-highest unemployment rate (5.8%) of any metropolitan area in the state.[100]

2.3.2

Building new highways shifts economic activity from one place to another; as a result, economic gains along a new route are largely offset by economic losses elsewhere. Indeed, the United States' study of Corridor 18 (now national I-69) concluded that any economic gains along the route would cause losses elsewhere, and simply represent transfers.[101] In the case of a new-terrain I-69, the US 41 counties will suffer many of those losses.

2.3.2

[94] www.stats.indiana.edu/bea/p.asp.

[95] www.stats.indiana.edu/bea/p.asp.

[96] www.stats.indiana.edu.

[97] Traffic along US 41 would be 30-40% lower if the new-terrain I-69 were to be built, according to the DEIS. Table 5.8-1, at p. 5-42. On average, depending on the route chosen, businesses along US 41 would lose over $20 million in sales every year. Table 5.5-2, at p. 5-35.

[98] All data in this section is from the US Census, and is available at www.stats.indiana.edu/.

[99] All figures in this bullet point are as of 1998. The US 41 counties have an estimated 23,011 people in poverty, while the new-terrain counties have 9,007.

[100] Figures are as of August 2002. Only Gary, at 6.1%, has a higher unemployment rate than Terre Haute.

[101] "For all practical purposes, all of these competitive position impacts are drawn from elsewhere in the U.S. The Corridor 18 primary impact area communities gain, but at a loss to the rest of the U.S." Final Report: Corridor 18 Feasibility Study, at p. 7-9 (Nov. 1995) (copy attached to these Comments); "Few of these impacts actually constitute net improvements in the U.S. economy. Most involve transfers from elsewhere in the U.S. to the Corridor 18 primary impact area." Id. at p. 7-11.

3.11.7 The International Economic Development Council Report

INDOT hired the IEDC to study transportation conditions and economic development in Indiana. IEDC's report is incomplete because it did not report on the number of businesses that have been lost in cities along interstates and other large highways. *Nevertheless, the IEDC report does find, consistent with our analysis of highway impacts in rural counties, that "the presence of a highway by no means guarantees economic development."*[102] We concur, especially in rural areas with lower population. 2.3.2

A major omission in the IEDC report is its failure to evaluate transfer and induced demand effects when new highways draw traffic away from existing corridors. We understand that, although IEDC was supposed to study the economic costs of new highway construction, INDOT never contracted with IEDC to begin the study. A balanced review of both the benefits and the costs of new highway construction is legally required under NEPA. *Therefore, INDOT should have the IEDC evaluate the economic (and social) costs of a new highway on all communities in Southwest Indiana, and not simply a cursory review of direct economic losses along US 41.* 2.3.2

Another example of incompleteness in the IEDC report is the discussion of the Crane Division Naval Surface Warfare Center (Crane). IEDC attempts to link the continued viability of Crane to the existence of a major highway. *The IEDC report does not mention that INDOT already is planning to upgrade and improve U.S. 231, which runs north-south past Crane.* Upgrading U.S. 231 will improve Crane's access to I-70 to the north and I-64 to the south. Improving other roads in the area would improve Crane's access in all directions. 2.3.2

As the IEDC report concedes, Crane is doing well and is planning to expand. Speaking earlier this year in Indianapolis, Navy Vice Admiral Pete Nanos commented that "the future for Crane looks pretty bright. . . . Crane is very diversified and does many things well."[103] Crane has survived and prospered while other bases across the country have closed. *For example, from 1991 to 1995, 35 of the 40 bases closed by the Pentagon were on or very near to an interstate highway.* Clearly, the presence of an interstate is no indicator that a military base will remain open; likewise, the lack of a nearby interstate does not hinder a military base's operation, and it may help the installation by improving security. 2.3.2

[102] IEDC Report, at p. 53.

[103] Navy official says Crane will stay, Bedford Times-Mail (May 15, 2002) (Attachment L).

3.11.8 Highways Have Not Improved Life in Rural Indiana Communities

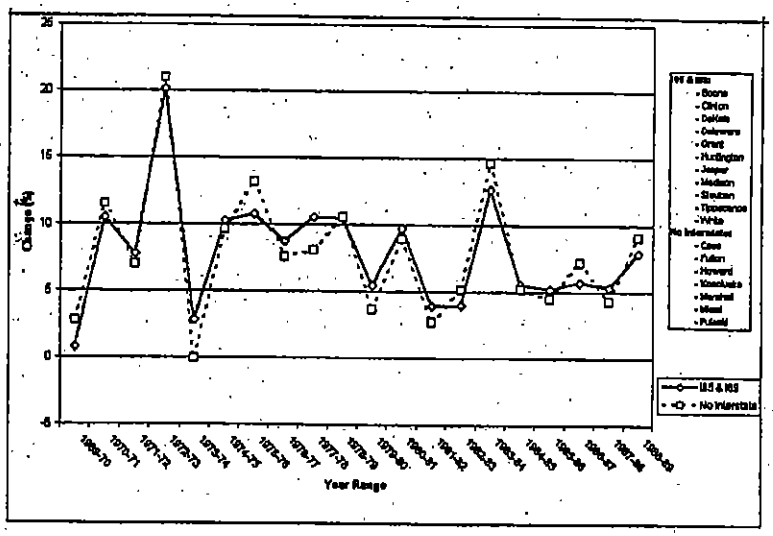
INDOT has failed to ask a basic question in its analysis of economic development and highways; namely, how do economic conditions in Indiana compare in communities on or near interstates compared with those not near interstates? Based on our analysis, highways do *not* contribute significantly to economic development in rural counties with low population. Common sense supports this conclusion, since in many rural counties the only signs of economic development along highways are gasoline stations and fast-food restaurants. When these minimal benefits are compared to the costs -- for example, construction costs, divided farms, destroyed farmland, road closures, induced demand and sprawl -- highways can be net economic losers. 2.3.2

Specific examples of the lack of benefit of highways to rural communities in Indiana include the following:

- The per capita personal income of largely rural counties along existing Interstates I-65 and I-69 is no better than in communities not near an interstate. The incomes in both areas have tracked nearly the same. 2.3.2
- More than half of the counties statewide that the USDA classifies as "stressed" are on or near an interstate highway.
- 11 of the 17 counties Statewide that did not increase in population between 1990 and 2000 are on or near an interstate highway.[104]

[104] All data from www.stats.indiana.edu.

Figure 1[106]
Average Per Capita Personal Income
Interstates and No Interstates



INDOT's economic data actually support the conclusion that Indiana's relatively low standing in economic measures compared to the United States as a whole is attributable to factors *other* than the presence or absence of interstate highways. Indiana is ranked 12th in the nation in the number of interstate miles.[106] According to the DEIS, Indiana "has lagged significantly behind the rest of the United States in population growth,"[107] Indiana has "lagged significantly behind the rest of the United States in employment growth,"[108] and Indiana is "significantly *under*-represented in those industries that are the fastest-growing nationally."[109] Given Indiana's high number of total interstate miles, these facts, if true, would argue in favor of 2.3.2

[105] www.states.indiana.edu.

[106] See FHWA's 2000 State Highway Briefing Sheet for Indiana, available at www.fhwa.dot.gov/ohim/hbs/in.htm.

[107] DEIS, at p. 2-26.

[108] DEIS, at p. 2-27.

[109] DEIS, at p. 2-29 (emphasis in original).

economic development measures other than construction of new interstate highways to improve the state's standing relative to the rest of the United States. 2.3.2

3.11.9 Failure to Consider Other Economic Development Alternatives

Another flaw in the DEIS is that INDOT did not address feasible alternatives for meeting the project's economic development purpose. NEPA requires a full and fair evaluation of feasible alternatives for meeting the project's stated purpose and need. These alternatives could include upgrading the region's rail network and freight handling facilities, expanding job training and skill marketing ventures, constructing high technology parks, and creating rural enterprise zones. The cost per job of most of these programs is between $1,000 and $5,000.[110] INDOT predicted that the best-performing route alternatives (Routes 3B and 3C) could potentially result in up to 4,300 additional jobs compared to the baseline no-build alternative.[111] Assuming the high-end cost of $5,000 per job for other economic development alternatives, INDOT could achieve the same employment gain at a cost of only $21.5 million, which is only a small fraction of the estimated cost of any of the build alternatives. INDOT should evaluate non-highway economic development alternatives and compare the costs and benefits of those alternatives to the costs and benefits of building a new highway. INDOT's failure to perform such a cost-benefit analysis for any of the economic development measures invalidates the agency's decisionmaking process under NEPA. 2.3.2

3.12 National Interstate 69 (Corridor 18) Core Goal

One of INDOT's three core goals for the Interstate 69 project is to complete Indiana's portion of Corridor 18. A major problem with including this goal is that it eliminates the "no-build" alternative from consideration, despite a legal requirement to consider it.[112] INDOT has promised to consider the no-build alternative, which would allow INDOT to seriously consider other transportation options, such as high-speed rail. Completing Indiana's portion of Corridor 18 -- which Congress has designated as an interstate highway -- requires construction of a new or 2.2.1

[110] See W. Wiewel et al., "The Proposed New Interstate 69 Highway: Is It a Cost-Effective Rural Economic Development Tool for Southwest Indiana" (Jan. 1999), at pp. 5-8 (Attachment M of these comments).

[111] DEIS, at p. 3-45.

[112] See 40 CFR §§ 1502.14(d), 1508.25(b)(1).

upgraded highway through Southwestern Indiana. Since inclusion of that goal will force INDOT to violate NEPA (by eliminating the no-build alternative), INDOT should eliminate the Corridor 18 goal from the project. Otherwise, INDOT's statement that it will seriously consider a no-build alternative simply is not credible. 2.2.1

A separate reason to remove the Corridor 18 goal from the DEIS is that a new Canada-to-Mexico highway is not legally or practically necessary. In the draft purpose and need statement for Evansville to Indianapolis I-69, INDOT conceded that federal law "does not require states to complete I-69; if an individual state does not want to complete its portion of I-69, it will not be compelled to do so."[113] Likewise, in the DEIS, INDOT agrees that "[t]hese policy decisions do not require that I-69 be completed between Evansville and Indianapolis, nor do they dictate a specific route".[114] In other words, the Indiana I-69 project must be justified on its own merits. 2.2.1

Moreover, traffic already flows freely between Canada and Mexico on existing highways. There is no compelling transportation need to build a major new interstate route that would drain Indiana's budget and simply transfer economic benefits from one area to another. Since Corridor 18 is not a mandate, and it is decades away from completion, INDOT's goal of completing Indiana's portion of Corridor 18 through new highway development is unnecessary and should be eliminated. We do note, however, that Alternative 1 completely meets the statutory requirements for Corridor 18 because it connects Evansville and Indianapolis, which are included in the Corridor 18 legislation.[115] 2.2.1

INDOT's benefits analysis for Corridor 18/National I-69 also is flawed. Smart Mobility's analysis explains why INDOT has substantially overstated the trucking and intermodal facility benefits of any of the alternatives compared to the no-build alternative.

Alternative 1 meets all seven national "overall goals" for I-69. For example, Goal 7 names cities including Indianapolis and Evansville. As the text of the DEIS emphasizes,

[113] Draft Purpose and Need Statement (April 17, 2001), at p. 6 (Attachment I). Although INDOT deleted this statement in the DEIS (compare with page 2-4 of the DEIS), the statement remains true: Corridor 18 is not a mandate.

[114] DEIS, at p. 2-1.

[115] DEIS, at p. 2-4.

Bloomington is not mentioned, and no specific alignment is prescribed.[116] Goal 6 is "To upgrade existing facilities to be utilized as I-69 within the corridor to design standards suitable for an Interstate highway and commensurate with projected demand." As noted earlier in these comments, upgrading existing roadways is the primary approach Kentucky plans to use for I-69. Therefore, upgrading existing roadways is completely consistent with the I-69 mandates.

[116] DEIS, at p. 2-4.

4.0 ENVIRONMENTAL IMPACTS

Two years ago then-Commissioner of INDOT Cristine Klika promised that environmental impacts would be a "crucial" factor in deciding the route corridor for a new Interstate 69.[117] Indeed, the official logo for the I-69 project prominently features a tree and a raptor, strongly suggesting that environmental concerns would be paramount:

Regrettably, the logo was only for image; INDOT gave environmental concerns short shrift in the DEIS. INDOT did not even assign a performance measure to environmental impacts. Public Interest Organizations repeatedly have urged INDOT to explicitly factor environmental impacts into the I-69 decisionmaking process. Where, for example, multiple corridors score similarly on performance measures, INDOT should choose the route with the fewest environmental impacts. INDOT, however, continues to ignore these requests.

4.1 Measuring Environmental Impacts

For reasons already explained in these comments in Section 2.1, INDOT's implementation of a tiered NEPA process thwarts a meaningful environmental impact analysis. 5.1.1

INDOT's measurement of environmental impacts within fictional working alignments that often have little bearing to reality renders a comparative analysis invalid. INDOT could have measured all relevant impacts within the 2,000 foot road corridors inside the two-mile wide Study Bands; instead, it measured impacts only within a 240 to 470 feet wide "working alignment" inside the Study Band. At only 2 to 4 percent of the width of the Study Band, the fictional working alignment is a poor substitute for measuring impacts across a broader section of the Study Band. Measuring impacts inside a fictional working alignment significantly reduces the likelihood that actual impacts will correlate to the predicted impacts. The working alignment 5.1.1 5.1.2

[117] Indianapolis Star, April 18, 2001, at p A1.

fiction produces especially speculative impact predictions for those segments of Alternatives 2 to 5 that cross new terrain areas, where no existing road serves as the basis for the working alignment. Actual impacts may be far higher than predicted impacts, but that information will not become available until the second tier NEPA studies, after INDOT already has chosen the route corridor. 5.1.2

4.1.1 Alternative 1 Would Cause the Fewest Environmental Impacts

INDOT's impact analysis, deeply flawed though it may be, correctly and unsurprisingly concludes that Alternative 1 has the least direct and indirect environmental impacts. That Alternative 1 has the fewest impacts is not surprising, since a large segment of the alternative uses existing I-70, and other segments use U.S. 41, which is a four-lane divided highway with a large median in many sections. Even assuming that INDOT has underestimated many of the potential impacts along the new-terrain alternatives, the difference in impacts between Alternative 1 and INDOT's preferred alternatives is significant:

Table 3
Additional Environmental Losses of New-Terrain Alternatives
(based on Alternative 1 as the baseline)
(in acres)

	Route 2C	Route 3B	Route 3C	Route 4B	Route 4C	Average Difference
Farmland	3482	3350	3120	3577	4227	3551
Forest	892	1482	1328	903	880	1097
Wetlands	75	101	95	113	138	104
Floodplains Crossed	1275	510	530	680	1260	851
Karst (sinkhole) Impacts	110	30	50	140	110	88

Note: All information from DEIS Table 6-1. Averages are used for ranges of impacts. Includes direct and indirect impacts.

Given that no one alternative scores significantly better on any of the performance measures, the significantly lower environmental impacts of Alternative 1 – together with the alternative's much lower costs – should be decisive factors in INDOT's decisionmaking process. Instead, INDOT ignored environmental impacts as a deciding, or even material, factor in choosing its preferred alternatives. 6.2

4.2 The Farmland Protection Policy Act

The Farmland Protection Policy Act (FPPA) compels federal agencies "to minimize the extent to which Federal programs contribute to the unnecessary and irreversible conversion of farmland to non-agricultural uses."[118] In enacting the FPPA, Congress found that "the Nation's farmland is a unique natural resource," that "the extensive use of farmland for nonagricultural purposes undermines the economic base of many rural areas," and that "Federal actions, in many cases, result in the conversion of farmland to nonagricultural uses where alternative actions would be preferred."[119]

Normally, the Farmland Conversion Impact Rating System is used to assess farmland risk. Each federal project affecting farmland is given a score between 0 and 260, reflecting the value of and harm to the farmland affected by the project. Whenever the score totals 160 or more, the federal agency responsible for the project is to give consideration to the farmland, in part by considering alternatives that would destroy less farmland.[120] INDOT did not follow this process in the DEIS for I-69. Instead, INDOT decided that "the enormity of the project and the complexity of the alternatives" justified using an alternative methodology that does not generate a score.[121]

INDOT's approach misses the point of the FPPA, which is to minimize farmland loss. There is no evidence in the DEIS that INDOT's preferred alternatives would minimize farmland loss; indeed, the preferred alternatives are the most destructive of farmland. Nor does INDOT's non-standard methodology show the relative quality of the farmland at risk, or otherwise take into account any of the other factors included in the standard scoring process.

INDOT should have used the normal rating system to evaluate farmland and minimize losses in the planning process. If INDOT really believed that the scoring system would prevent meaningful comparison among different alternatives, it should have used its alternative method in addition to the scoring method, rather than instead of it. By postponing the usual FPPA 5.20

[118] 7 U.S.C. § 4201(b).

[119] Id. § 4201(a).

[120] 7 C.F.R. § 658.4(c)4.

[121] See DEIS, at pp. 5-154 to 5-155.

scoring process until Tier 2, INDOT has avoided applying the FPPA to the selection of a route corridor, which as pertains to farmland is an extremely important decision. INDOT's non-standard application of the FPPA violates NEPA. 5.20

4.3 Social Impacts

Apart from a cursory discussion in Section 5.3.1, the DEIS fails to either quantify or otherwise discuss in detail the negative social impacts on residents in the path of a new highway. The DEIS does discuss negative fiscal impacts along the US 37 and US 41 corridors, but the DEIS is silent on such issues as longer school bus trips, delayed emergency service, divided communities, and other significant community issues. INDOT should have discussed these impacts in more detail, and in more areas of concern than solely residential relocations. Highways can disrupt the social fabric of a community, but the DEIS ignores these disruptions. 5.3

4.3.1 Impacts on the Amish and Mennonite Communities

An especially serious omission in the DEIS is the lack of analysis of impacts on the Amish and Mennonite communities around Washington, Daviess County. According to INDOT's insufficient review: 5.3

> The four different [Alternative 3] routes around Washington will have varying effects upon the Amish and Mennonite communities. The East and Far East routes will have the greatest impacts with farm acreage acquired from five Amish properties and two Mennonite properties. One Amish residence would be acquired along with the associated farm buildings. The West route would be split at least two Amish farms, while the Far West Route is not expected to impact the Amish community.[122]

This brief analysis is symptomatic of the DEIS' failure to analyze any of the significant social impacts on communities in the path of a new highway. The impacts would be especially harmful for the Amish. For example, the Far West alternative for Route 3 would severely impact the Old Order Amish settlement near Montgomery, which is one of the largest Amish communities in Indiana and is known nationwide for breeding "pulling horses," which pull farm implements such as plows: 5.3

[122] DEIS, at pp. 5-19 to 5-20.

- By creating a barrier through the community (horses and buggies cannot travel on interstate highways) and requiring the closure of numerous local roads, it would force the Amish to travel miles out of their way to visit friends and family that used to be "just down the road." Because travel by horse and buggy is so much slower than by car, people and places in their own community would, as a practical matter, be inaccessible to many Amish. 5.3

- It would divide an Amish church district, making it difficult for many members to attend Sunday church services. 5.3

- It would pave over five Amish farms, some of which have been in Amish families for generations. And it would make it difficult for Amish farmers on opposite sides of the highway to help each other with harvesting and other chores, as is traditional in their way of life. 5.3

- It would bring thousands of motorists, including tourists, through what is now a secluded community, disrupting the privacy and quiet that are critical to the Amish way of life. The Amish, whose religion forbids them from being photographed, fear becoming a "tourist attraction." 5.3

The DEIS is silent on these and other social and community impacts to the Amish and Mennonite communities.

The DEIS also fails to discuss the Amish and Mennonite settlements under relevant Council on Environmental Quality guidelines, which require that the NEPA review process appropriately "analyze environmental effects on minority populations, low-income populations, or Indian tribes, including human health, social, and economic effects."[123] These guidelines emphasize that the goals of NEPA and environmental justice are complementary, such as preserving "important *historic, cultural*, and natural aspects of our natural heritage."[124] The CEQ guidance also recognizes that environmental justice concerns "may arise from the impacts on the natural and physical environment."[125] Such impacts include "aesthetic, *historic, cultural, economic, social* or health, whether direct, indirect or cumulative."[126] INDOT therefore should recognize these factors, including "the physical sensitivity of the community or population to 5.4

[122] Council on Environmental Quality, Environmental Justice, Guidance Under the National Environmental Policy Act, § 1, at p.1 (Dec. 10, 1997) (CEQ Guidance).

[124] CEQ Guidance, § III.A., at p. 7 (emphasis added). See 42 U.S.C. §4331(b)(4).

[125] CEQ Guidance, § III.B., at p. 8.

[126] 40 CFR 1508.8 (emphasis added).

particular impacts, the effect of any disruption on the community structure associated with the proposed action; and the nature and degree of the impact on the physical and social structure of the community."[127] These guidelines require agencies to recognize that impacts within certain groups may differ "from impacts on the general population due to a community's distinct cultural practices."[128] INDOT has not given the Amish and Mennonite communities Washington nearly enough scrutiny under this guidance.

4.4 Archaeological Impacts

The attached report of consulting archaeologists Patrick and Cheryl Munson (Attachment describe the flaws in INDOT's archaeological impacts analysis. This report reviews relevant archeological data and INDOT's interpretation of the data. The report also confirms that INDOT's fictional "working alignment" approach to evaluating impacts is an unreasonable method for evaluating impacts, whether at the Tier 1 or Tier 2 level.

4.5 Threatened and Endangered Species Impacts

INDOT's DEIS impacts analysis for threatened and endangered species is based in part on outdated and flawed information. In particular, many of the last surveys were performed in 1993, and significant changes to habitat have occurred since then. The DEIS also inappropriately focuses on *occurrences* of these species and the need to avoid these sites, instead of looking more broadly at the larger and more widespread habitats. 5.17

The information listed below is not included in the DEIS, and it indicates that constructing a new-terrain interstate highway will threaten more species than the DEIS acknowledges.

4.5.1 Indiana Bat

The primary cause for the decline of the Indiana bat population is not human disturbance during hibernation.[129] The causes of the continuing decline are not fully understood but include 5.17

[127] CEQ Guidance, § III.B.1., at p. 9.

[128] CEQ Guidance, § III.C.3., at p. 14.

[129] DEIS, at p. 5-125.

impacts to both hibernacula and to summer habitat (overmature riparian and upland hardwood forests). A highway will cause additional losses of Indiana bat summer habitat. Preservation of bat habitat in Indiana is particularly important to the bat's survival since Indiana is the only state in the bat's range that does not have a declining bat population. 5.17

The last bat survey done within the study area occurred in 1993, and many changes in the bat's habitat and population may have occurred in the last decade.[130] INDOT therefore should conduct a new survey of bat habitat.

4.5.2 Mussels

The eastern fanshell and rough pigtoe mussels both are present in the East Fork of the White River. The Lower East Fork of the White River is now being compared favorably with the Upper Tippecanoe River in Indiana, which the Nature Conservancy ranks as the eighth most biologically diverse river in the U.S. 5.17

INDOT's review of mussel records is based on an outdated and insufficient 1993 survey.

4.5.3 Bobcat

The bobcat is a state endangered species, and it is an area-dependent species that is very sensitive to human contact. Alternatives 2, 4 and 5 all traverse known bobcat habitat.

4.5.4 Copperbelly Water Snake

The copperbelly snake is a state endangered species, and the snakes are known to inhabit the Patoka River and Pigeon River areas. Alternatives 3, 4, and 5 all traverse this habitat. Additionally, Appendix I, Part 3 has inaccurate information on the copperbelly. The species is state endangered throughout *all* of Indiana, and the northern population is listed as federally-threatened. 5.17

[130] DEIS, at p. 5-126.

4.5.5 Lake Sturgeon

The lake sturgeon is a state endangered species. There is a significant population of lake sturgeon in the lower East Fork of White River. As in 1996, the DEIS overlooks the presence of this endangered fish 5.17

4.5.6 Spotted Darter

The spotted darter is a state endangered species. A new population of the spotted darter has been found in the East Fork of the White River; three other endangered darters are known to be present there. 5.17

4.5.7 Harlequin Darter

The harlequin darter is a state endangered species. A new population of the harlequin darter has been found in the Patoka River. 5.17

4.5.8 River Otter

The river otter is a state endangered species. The river otter has been reintroduced at Sugar Ridge Fish and Wildlife Area on the Patoka River. Otters have been found along the East Fork of the White River. 5.17

4.5.9 Cerulean Warbler

This species of special concern is a forest interior-dependent species. The cerulean warbler is now being considered for listing by the U.S. Fish and Wildlife Service. 5.17

5.0 SECTION 4(F) REQUIREMENTS

Section 4(f) of the Department of Transportation Act protects historic sites and public parks, recreation areas and wildlife refuges. Section 4(f) provides that FHWA may not approve "the use of land" unless "there is no prudent and feasible alternative to using that land" and the project includes all planning to minimize harm.[131] "Use" of the land is either actual or constructive.

The DEIS analysis of Section 4(f) issues includes several major errors and omissions, discussed below. All of these omissions involve property in the path of one of the new-terrain corridors. Prior to approving any corridor that runs through or near any of these areas, FHWA must determine that there is no prudent and feasible alternative to using that land. FHWA cannot make that determination in view of the substantially less destructive Alternative 1. (Even before taking into account the errors and omissions described below, Figure 8-1 of the DEIS makes clear that Alternative 1 would impact the fewest Section 4(f) lands, and is a feasible and prudent alternative.) 8.2

5.1 Patoka River National Wildlife Refuge

Alternatives 3, 4 and 5 would cross through the Patoka River National Wildlife Refuge. The refuge is designated a "wildlife refuge" as described in Section 4(f). At present, the PRNWR has a total of 5,131 acres, not the 2,670 acres mentioned in the DEIS. 8.2

Building a highway through the PRNWR will trigger Section 4(f) review, since Alternatives 3, 4 and 5 will directly harm the wildlife refuge, notwithstanding the preservation of a corridor for a highway through the refuge area. Building a highway through the refuge also will result in a constructive use of the refuge. Constructive use occurs when land is not directly taken for the project but the project is so close to the land that its impacts substantially impair the environmental and other values of the protected site. 8.2

Constructive use of the PRNWR will occur even if the highway passes through an agreed-upon corridor intended to minimize direct impacts. The highway will substantially

[131] 49 U.S.C. § 303(b)(1).

impair the use of the resource as a refuge for wildlife because a highway corridor will act as a barrier to bird and animal movement, and increase the likelihood of roadway crossing mortality among wildlife. In particular, a direct physical barrier such as an interstate highway will adversely affect less mobile species such as many amphibians and reptiles. By creating a barrier and an open corridor, roads also fragment habitat and increase edge habitat that is detrimental to forest interior species such as many of the migratory songbirds (e.g., the cerulean warbler and red-eyed vireo). 8.2

5.2 Sugar Ridge State Fish and Wildlife Area

Alternatives 3, 4 and 5 would cross very close to the boundary of the Sugar Ridge State Fish and Wildlife Area (Sugar Ridge). Sugar Ridge is a designated "wildlife refuge" as provided in Section 4(f). Constructing a new interstate next to Sugar Ridge also will cause a constructive use by impairing use of the resource for wildlife. Alternatives 3, 4 and 5 therefore will trigger Section 4(f) review. The FHWA cannot determine that there is no prudent and feasible alternative to using Sugar Ridge, since Alternative 1 is such a feasible and prudent alternative. 8.2

5.3 Morgan-Monroe State Forest and Martin State Forest

Alternatives 3B, 3C and 5 would cut through Morgan-Monroe State Forest, and Alternative 5 would cut through Martin State Forest. These forests are subject to Section 4(f) because the "organic" act for the Indiana State Forests provides that protecting and conserving "wildlife" in the state forests is one of their designated uses, and that the "equal enjoyment and guaranteed use of future generations" (*i.e.*, outdoor recreation use) is the overarching public policy reason to protect state forest.[132] (The State Forest Procedures Manual also addresses this purpose.) Therefore, building any of these roads would trigger Section 4(f) review. 8.2

Outdoor recreation is a major, not incidental, use of all state forests. They offer both dispersed and developed recreation (campgrounds, trails, picnic areas). There are developed sites (picnic areas) within one-half to one mile of the I-69 corridor through Morgan-Monroe State Forest. Daily traffic of tens of thousands of vehicles, including thousands of large heavy

[132] Indiana Code § 14-23-4-1 ("It is the public policy of Indiana to protect and conserve the timber, water resources, *wildlife*, and topsoil in the state forests for the *equal enjoyment and guaranteed use* of future generations") (emphasis added).

transport trucks, will substantially increase noise and air pollution, and cause both direct and constructive uses of the forests.

The Combs Unit of Martin State Forest lies directly in the route of Alternative 3, but is not identified in the Environmental Atlas or the DEIS Section 4(f) evaluation. As a state forest property, it should be a Section 4f property. 8.1

Since a prudent and feasible alternative exists to building a new interstate through these forests, the FHWA will be unable to determine that there is no alternative to building a highway through these forests.

5.4 Hoosier National For. est

Alternative 5 would pass through the Tincher Special Area. Notably, the entire Special Area, and not just the pond site as described in the DEIS, is a Section 4(f) area. The 1991 Hoosier National Forest Land and Resource Management Plan Amendment designates Tincher as a Special Area (Management Area 8.2) "which include unique or unusual ecological, botanical, zoological, geological, scenic, historic, prehistoric, and other areas which merit special recognition and management." This designation is functionally and legally equivalent to a "wildlife refuge" under Section 4(f) and constitutes a major purpose of this area. Building Alternative 5 would trigger Section 4(f) review. Given the existence of Alternative 1, the FHWA would not be able to determine that no prudent and feasible alternative exists. 8.1

5.5 Southwestway Park (Indianapolis)

The 2000 foot study corridor for Alternative 3B/C1 cuts across Southwestway Park, which is owned by the City of Indianapolis. The DEIS does not mention this area in the Section 4(f) evaluation. As with the other Section 4(f) properties, even if INDOT designs a highway alignment outside of the park, the noise, pollution, and other impacts from the highway will result in a constructive use of the park, which would require the FHWA to determine that no feasible and prudent alternative exists to using the land, which is not possible for the FHWA to do. 8.1

5.6 Amish Historic District

The Daviess County Old Order Amish Settlement near Montgomery is eligible for listing to the National Register of Historic Places, and therefore qualifies as a Section 4(f) property. This community began in 1868 or 1869 and was part of a second major wave of Amish resettlement in America. The first occurred in the late 1700s and was principally centered in Pennsylvania. The second was much larger than the first.[133] 5.13

The historical and cultural significance of the Daviess County Old Order Amish community are defined by the traditions, belief structure, and lifeways of the people who created the community and the descendants who have maintained the traditions to the present day. These traditions are inextricably tied to agriculture and as a result the overall cultural landscape is the principal tangible element of the community's significance. 5.13

Two National Register bulletins support listing the Amish community on the National Register. *National Register Bulletin #30: Guidelines for Evaluating and Documenting Rural Historic Landscapes*, describes much of the methodology required to document the *tangible* elements of a cultural landscape. Although the community does not retain a significant collection of historic buildings, the continuation of horse-drawn plows and other traditional farming practices has resulted in a relatively consistent appearance of the farmland itself, and the pattern of land use remains relatively consistent. 5.13

National Register Bulletin #38: Guidelines for Evaluating Traditional Cultural Properties, also is relevant to the listing. This bulletin explains the methodology for evaluating and designating sites that are eligible for inclusion in the National Register "because of [their] association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community." This bulletin supports listing based on the Amish community's traditional cultural practices and norms, which date back hundreds of years and which are at the core of the community's value system. The two bulletins jointly support listing because of the inextricable bond between the living community's cultural traditions and landscape. 5.13

[133] See generally Stoll, J., The Amish of Daviess County (self-published 1997).

6.0 Land and Water Conservation Fund Requirements

Section 6(f) of the Land and Water Conservation Fund Act of 1965 (LAWCON) requires the approval of the National Park Service for any planned "conversion" of property to any non-recreational or non-conservation use. [134] Implementing regulations require that "all practical alternatives to the proposed conversion [must] have been evaluated and rejected on a sound basis."[135]

In this case at least two properties trigger Section 6(f) review and approval by the National Park Service. Neither of these properties is addressed in the DEIS. First, virtually all of the PRNWR was acquired with LAWCON monies. Therefore, Section 6(f) applies to this area. The impairments to wildlife discussed above trigger the Section 6(f) approval requirements, notwithstanding the prior agreement of the agencies to reserve a highway corridor through the refuge. 8.5

Second, according to the Indiana Department of Natural Resources, "portions of Sugar Hill [sic] Fish and Wildlife Area have been acquired or developed (or both) with federal Land and Water Conservation Act (LAWCON) funds. Any negative impacts to this or other LAWCON sites may require a Section 6(f) conversion."[136] If any part of Sugar Ridge was acquired with LAWCON funds, the entire property is subject to Section 6(f). Alternatives 3 and 4 would impair Sugar Ridge's use for conservation and recreation, thereby constructively converting at least a part of Sugar Ridge. No conversion is possible without the prior approval of the National Park Service after compliance with all applicable legal requirements, including the identification of replacement property that meets specified criteria. 8.5

[134] 16 U.S.C. § 4601-8(f)(3).

[135] LAWCON Grants Manual, chapter 675.9(3)(B)(1); see 36 C.F.R. § 59.33(b)(1).

[136] See Letter from Indiana Department of Natural Resources to D.E. McGillam & Associates (Feb. 4, 1992), at p. 2 (copy included in Appendix Y of the DEIS).

Respectfully submitted,

John N. Moore
Staff Attorney
Environmental Law and Policy Center
35 East Wacker Drive – Suite 1300
Chicago, IL 60601

Andrew Knott
Air and Waste Policy Director
Hoosier Environmental Council
1915 West 18th Street - Suite A
Indianapolis, IN 46202

Thomas Tokarski
President
Citizens for Appropriate Rural Roads
8485 West Evans Road
Bloomington, IN 47403

Christopher Williams
Executive Director
Citizens Action Coalition of Indiana
5420 N. College Avenue -Suite 100
Indianapolis, IN 46220

Date: November 7, 2002

ATTACHMENT A

Comments of Smart Mobility, Inc.
Separately Bound

ATTACHMENT B

ENVIRONMENTAL LAW & POLICY CENTER
ILLINOIS · INDIANA · MICHIGAN · MINNESOTA · OHIO · WISCONSIN

August 16, 2002

BY FACSIMILE AND FIRST-CLASS MAIL

Kelly J. Whiteman
Chief Legal Counsel
Indiana Government Center North
100 North Senate Avenue - Room N755
Indianapolis, IN 46204-2249

Re: **Access to Public Records Act/Model and Data Information Request – Draft Environmental Impact Statement: I-69 Evansville to Indianapolis, Indiana**

Dear Ms. Whiteman:

On behalf of Environmental Law and Policy Center (ELPC), the Hoosier Environmental Council (HEC), and Citizens for Appropriate Rural Roads (CARR), and pursuant to the Access to Public Records Act (Indiana Code § 5-14-3), I hereby request that within seven days INDOT make available for inspection and copying full and complete "copies" (as that term is defined at Indiana Code § 5-14-3-2) of the following public records associated with the captioned draft environmental impact statement (DEIS), released by INDOT on July 31, 2002.

1. All information, including reports, hand-written notes, spreadsheets, templates, word processing documents, and other information that INDOT and its contractor used to calculate the construction costs for each of the route alternatives presented in Table 3-34 of the DEIS for I-69. This request includes but is not limited to all Microsoft Excel spreadsheets and templates discussed in *Task 4.4 Report, Preliminary Alternative Cost Estimates*; and the *Pre-engineering Cost Parameters General* Guidelines dated January 16, 1997, also referenced in *Task 4.4* report.

CARR, HEC, and ELPC require this information to provide comments to INDOT on the DEIS. Accordingly, time is of the essence to receive this information.

35 EAST WACKER DRIVE, SUITE 1300 CHICAGO, ILLINOIS 60601-2110
PHONE (312) 673-6500 FAX (312) 795-3730
www.elpc.org elpc@elpc.org

ROBERT L. GRAHAM – CHAIRPERSON HOWARD A. LEARNER – EXECUTIVE DIRECTOR

HEC and ELPC are not-for-profit organizations that seek access to the above records not for any commercial purpose, but rather to educate the public.

Please contact me (312-795-3706) if you have any questions about this request. Thank you very much.

Very truly yours,

John N. Moore

cc: Andrew Knott
Thomas Tokarski

ENVIRONMENTAL LAW & POLICY CENTER
ILLINOIS INDIANA MICHIGAN MINNESOTA OHIO WISCONSIN

August 30, 2002

BY FACSIMILE AND FIRST-CLASS MAIL

Kelly J. Whiteman
Chief Legal Counsel
Indiana Government Center North
100 North Senate Avenue - Room N755
Indianapolis, IN 46204-2249

Re: **Access to Public Records Act/Model and Data Information Request – Draft Environmental Impact Statement: I-69 Evansville to Indianapolis, Indiana**

Dear Ms. Whiteman:

On behalf of Environmental Law and Policy Center (ELPC), the Hoosier Environmental Council (HEC), and Citizens for Appropriate Rural Roads (CARR), and pursuant to the Access to Public Records Act (Indiana Code § 5-14-3), I hereby request that within seven days INDOT make available for inspection and copying full and complete "copies" (as that term is defined at Indiana Code § 5-14-3-2) of the following public records associated with the captioned draft environmental impact statement (DEIS), released by INDOT on July 31, 2002.

1. The text file containing the Traffic Analysis Zone (TAZ)-level accessibility indices for each accessibility category (population centers, employment, urban areas, major airports, and universities) for each of the route alternatives addressed in the DEIS. Our consultant believes that BLA has produced these indices because the following GISDK code is contained within the *FF_access37_mod.RSC* file:

```
// Create the output file containing the zone number, name and resulting accessibility index
      out = OpenFile("c:\\TransCAD\\I-69 Model\\Level 3_Access2025_Ind\\Alt 5b.txt","w")
      line = "Origin, TAZ_ID, AI_POP, AI_EMP, AI_MET, AI_AIR, AI_UNI, AI_REC, AI_PWEMP,
      AI_INOD, AI_EMP_FF"
      WriteLine(out,line)
```

In the code above, the program appears to have been last run to produce results for Alternative 5b (the output file has been specified as "*Alt 5b.txt*").

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ROBERT L. GRAHAM – CHAIRPERSON HOWARD A. LEARNER – EXECUTIVE DIRECTOR

2. The text files containing the TAZ-level indices for the 1998 baseline case and No-Build alternative for each of the five categories of accessibility referenced above.

CARR, HEC, and ELPC require this information to provide comments to INDOT on the DEIS. Accordingly, time is of the essence to receive this information.

Please send the documents and data to our retained consultant on this matter:

Norman Marshall
Smart Mobility, Inc.
16 Beaver Meadow Road, #3
Norwich, VT 05055

Please send all of the information to him via Federal Express. You may contact me for a FedEx billing number if necessary.

HEC and ELPC are not-for-profit organizations that seek access to the above records not for any commercial purpose, but rather to educate the public.

Please contact me (312-795-3706) if you have any questions about this request. Thank you very much.

Very truly yours,

John N. Moore

cc: Norm Marshall
Andrew Knott
Thomas Tokarski

INDIANA DEPARTMENT OF TRANSPORTATION
100 North Senate Avenue
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Indianapolis, Indiana 46204-2249
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FRANK O'BANNON, Governor
J. BRYAN NICOL, Commissioner

Writer's Direct Line

September 6, 2002

Mr. John N. Moore
Environmental Law & Policy Center
33 East Wacker Drive, Suite 1300
Chicago, IL 60601-2110

Re: Public Records Request for Information Relating to Construction Cost Estimates in Draft Environmental Impact Statement (DEIS) for I-69 Evansville to Indianapolis Project

Dear Mr. Moore:

In your letter to Kelly Whiteman dated August 16, 2002, you requested disclosure of "all information . . . that INDOT and its contractor used to calculate the construction costs for each of the route alternatives presented in Table 3-34 of the DEIS for I-69 . . . ." You submitted your request pursuant to the Access to Public Records Act (Indiana Code § 5-14-3). I am responding to your request on behalf of Kelly Whiteman, who is on leave.

The materials you have requested are not public records under the Indiana Access to Public Records Act. The calculation of construction costs was performed by the contractor, and all materials used to make that calculation were generated internally by the contractor. Because the contractor is not a public agency, its documents are not public records, and it is not subject to public disclosure requirements under IAPRA. See Indianapolis Convention & Visitors Bureau v. Indianapolis Newspapers, Inc., 577 N.E.2d 208, 212-13, 214 (Ind. 1991). Although these materials would be public records if "created, received, retained, maintained, used, or filed by or with" INDOT, the contractor has not shared those materials with INDOT. IC 5-14-3-2. The contractor has provided INDOT with its final estimates of construction costs only. Thus, these materials remain the internal work product of the contractor and are not subject to the public records disclosure requirements under IAPRA.

Nevertheless, in order to further the public disclosure objectives of the Indiana Access to Public Records Act and the National Environmental Policy Act, we have requested that the contractor provide you with printed copies of the spreadsheets referenced in the *Task 4.4 Report, Preliminary Alternative Cost Estimates*, along with relevant supporting materials. The spreadsheets and supporting materials include all inputs and assumptions used in developing the

construction cost estimates (costs, lengths, typical rights of way, etc.). The methodologies used in calculating the cost estimates are proprietary to the contractor and will not be provided.

We have asked the contractor to compile and transmit the spreadsheets and supporting materials as expeditiously as possible. We have been informed that the contractor expects to be able to transmit these documents to you within the next few days.

If you have any questions regarding this matter, please contact me at (317) 232-5323.

Sincerely,

William P. Huff

William Huff
Acting Chief Legal Counsel

INDIANA DEPARTMENT OF TRANSPORTATION
100 North Senate Avenue
Room N755.
Indianapolis, Indiana 46204-2249
(317) 232-5533 *FAX: (317) 232-0238*
An Equal Opportunity Employer ● http://www.state.in.us/dot

FRANK O'BANNON, Governor
J. BRYAN NICOL, Commissioner

Writer's Direct Line

September 25, 2002

Mr. John N. Moore
Environmental Law and Policy Center
35 East Wacker Drive, Suite 1300
Chicago, IL 60601-2110

Re: Public Records Request for TAZ-Level Accessibility Indices

Dear Mr. Moore:

In your letter dated August 30, 2002, you requested that INDOT make available for inspection and copying "the text file containing the Traffic Analysis Zone (TAZ)-level accessibility indices for each accessibility category . . . for each of the route alternatives addressed in the DEIS. . . ." You also requested the TAZ-level indices for each accessibility category for the 1998 baseline case and No-Build alternative. You submitted your request pursuant to the Access to Public Records Act (Indiana Code § 5-14-3). I am responding to your request on behalf of Kelly Whiteman, who is on leave.

Pursuant to Indiana Code § 5-14-3-2, these files are not a public record because INDOT has not created, received, retained, maintained, used or filed the files you are seeking. Instead, these files are the property of our Contractor.

We thank you for your interest in the I-69 project and encourage you to remain involved in this and other future INDOT projects. If you have any questions regarding this matter, please feel free to contact me at (317) 232-5323.

Sincerely,

William P. Huff

William Huff
Acting Chief Legal Counsel

U.S. Department of Transportation
Federal Highway Administration

Indiana Division

575 North Pennsylvania Street, Room 254
Indianapolis, Indiana 46204

October 30, 2002

John N. Moore
Environmental Law & Policy Center
35 East Wacker Drive, Suite 1300
Chicago, Illinois 60601-2110

Dear Mr. Moore,

I am writing in response to your September 17, 2002 and October 9, 2002 letters to me seeking information pursuant to the U.S. Freedom of Information Act (FOIA) regarding the I-69 Evansville to Indianapolis Draft Environmental Impact Statement (DEIS). You had requested that we release the following information:

1. "The text file containing the Traffic Analysis Zone (TAZ)-level accessibility indices for each accessibility category (population, employment, urban areas, major airports, and universities) for each of the route alternatives addressed in the DEIS."

2. "The text files containing the TAZ-level indices for the 1998 baseline case and No-Build alternatives for each categories of accessibility referenced above."

3. "The geographic information system (GIS) datasets for each of the 'preferred' and 'non-preferred' route alternatives in Arcview shapefile format, and the metadata associated with the creation of those files."

In accordance with the Freedom of Information Act (FOIA), 5 U.S.C. 552, FHWA is unable to provide you with any of the above information because we simply do not have this material in our files.

Pursuant to the regulations of the Department of Transportation, 49 CFR 7.21, you have the right to appeal the determination that no records could be found to Mr. Michael J. Vecchietti, Director of Administration, Federal Highway Administration, 400 Seventh St., S.W., Room 4316, Washington, D.C. 20590. Should you wish to appeal, his decision will be administratively final. Your appeal must be made in writing within 30 days after receipt of this letter and must include all information and arguments relied upon in making the appeal.

If you believe that clarification of certain points made in the DEIS should be made or additional data should be provided, then please explain in any comments you may have on the DEIS. The closing of the comment period for the DEIS is November 7.

If you have any questions, please to not hesitate to contact Robert Dirks at 317-226-7492 or robert.dirks@fhwa.dot.gov.

Sincerely,

John R. Baxter, P.E.
Division Administrator

Robert Dirks

By: Robert E. Dirks, P.E.
Environmental Engineer

CC: Janice Osadczuk – INDOT

Top state highway official says report on I-69 proves it's needed

Associated Press

EVANSVILLE

Indiana's top highway official says the state will likely jettison its "no build" option on a proposed Interstate 69 extension because a new report proves the need to link Evansville with Indianapolis.

"By law, we must carry the no-build alternative until the end of the study," said Cristine Klika, commissioner of the Indiana Department of Transportation. "But I feel confident that alternative will be discarded. There is truly a need."

Klika's comments to the editorial board of the Evansville *Courier & Press* came Friday, three days after the release of engineering and scientific data in the new draft report on I-69. She and deputy commissioner J. Bryan Nicol visited several newspapers Friday, including *The Herald-Times*.

She also said a federal environmental attorney is coming on board with state planners for the project, due to an expected legal challenge to the I-69 extension's environmental impact.

Klika said Gene Cleckley, the federal highway official in charge of managing I-69 planning through all the states in the interstate's path, assigned the environmental attorney to help Indiana.

She said the state is dealing with those issues "very meticulously."

"This is a transportation project," Klika said. "That is not to say the environment will not be included in the analysis."

The "Purpose and Need" paper on I-69 was released Tuesday and identifies 14 potential alternative routes, including the no build option.

The Hoosier Environmental Council favors a route that would take I-69 along existing U.S. 41 to Interstate 70 to avoid the environmental impact of a new-terrain highway.

The goals that INDOT has set will be discussed in a series of public hearings on the draft report early next month. The first one will be May 7 in Martinsville.

After those hearings, Klika said, the state will sift through the comments and begin the process of narrowing the alternatives to three to five routes.

That should be complete by late this summer, and will be followed by more public hearings. Additional public hearings will be held on the draft environmental impact statement when it is prepared.

Vince Bernardin of the states consulting firm, Bernardin, Lochmueller & Associates, said a "monumental effort" is being made to minimize the interstate's impact on the environment.

Klika said the economic analysis in the draft paper clearly shows that "there is a need for a good highway link from Evansville to Indianapolis.

"Never before in any of the myriad studies has there ever been bona fide, definitive engineering and factual proof of that," she said.

She dismissed concerns that Illinois might be interested in getting the I-69 project from Indiana — a concern raised by U.S. Rep. John Hostettler, R-Ind.

Klika said she met last week with the Illinois transportation commissioner and is convinced "I-69 is not anywhere remotely on Illinois' radar screen. They're knee-deep in other major issues."

ATTACHMENT C

ATTACHMENT D

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FRANK O'BANNON, Governor
CRISTINE M. KLIKA, Commissioner

Writer's Direct Line

317-232-5535

April 12, 2000

Alexander Ewing, Esq.
Environmental Law and Policy Center
35 East Wacker Drive
Chicago IL 60601-2110

Re: I-69/Evansville-to-Indy Study/CUED Panel

Dear Mr. Ewing:

Thank your for your letter of March 31, 2000 regarding the work of the Council on Urban Economic Development (CUED) panel as part of the Tier 1 EIS for the proposed I-69/Evansville-to-Indianapolis project. I am writing to let you know how we are addressing the issues raised in your letter.

At the outset, I should note that the current role of the CUED panel is limited. At this time, the CUED panel is performing work under Task 3.4 in the consultant's scope of work for this study. Under that task, the role of the CUED panel is to evaluate the relationship between transportation infrastructure and other economic development incentives in Southwest Indiana, and, in particular, to address the issue of whether there are weaknesses in the transportation system that impede the area's potential for growth. Thus, the CUED panel will not draft the purpose-and-need statement for the project, nor will it make or recommend decisions concerning the selection or elimination of particular alternatives. Furthermore, the current work of the CUED panel does not include the work that will later be done by the panel under Task 5.3.2, which calls for an assessment of the negative economic impacts of the corridors selected for detailed study in the Tier 1 EIS. Thus, while the CUED panel eventually will be asked to evaluate potentially negative economic impacts of particular alternatives, that issue is not the primary focus of the panel's current work.

With that background, I will address each of the specific requests that you have made raised in your letter:

I. Consultation with Experts and Community Leaders

You have asked that the CUED panel consult with (1) Professor Marlon Boarnet, the author of an article that was attached to your letter; (2) representatives of business and economic development organizations from communities along the U.S. 41 corridor; and (3) elected officials from communities along the U.S. 41 corridor.

It is our expectation that the CUED panel will review the relevant academic literature, will consult with key experts in the relevant fields, and will meet with a broad cross-section of business and community leaders from throughout Southwest Indiana – including the communities along U.S. 41. In keeping with this approach, the CUED panel will in fact meet with many of the individuals mentioned in your letter. In addition, after its two-day visit is concluded, the CUED panel will continue its ongoing review of the academic literature and its consultations with key experts, which I would expect to include Professor Boarnet.

II. Review of 1999 Study by Wim Wiewel

You have asked that the CUED panel give full consideration to a 1999 study prepared by Wim Wiewel, Dean of the College of Urban Planning and Public Affairs at the University of Illinois at Chicago, entitled "The Proposed New Interstate 69 Highway: Is It A Cost-Effective Rural Economic Development Tool for Southwest Indiana?"

As indicated above, the CUED panel will review the relevant academic literature concerning the relationship between transportation infrastructure and economic development. As part of that effort, the panel will consider the Wiewel study. If the panel has questions concerning the study, I would expect that they would consult with Mr. Wiewel or others who participated in the preparation of that study.

III. Consideration of Harm to Local Economies

You have asked that the CUED panel talk with local farm leaders and owners concerning the potential negative economic impact that a new highway could have on farms in Southwest Indiana. Again, we have asked the CUED panel to meet with the full range of business and community leaders in Southwest Indiana. In keeping with that approach, the CUED panel has requested interviews with representatives of agricultural interests in Southwest Indiana.

At the same time, please keep in mind that it is not within CUED's scope of work to determine what harm will there be (if any) to the agricultural economy of the study area. Econometric analysis tools will be used to estimate impacts of alternatives upon the agricultural sector of the regional economy. The CUED panel's work can furnish helpful information for this analysis, but it will not make the final determination.

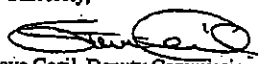
IV. Consideration of Non-Highway Alternatives

You have asked that the CUED panel avoid dismissing non-highway alternatives based on the lack of available funding and/or the need for changes in existing laws or policies. As explained above, the CUED panel has not been charged with making or recommending decisions about which alternatives should be considered, eliminated, or carried forward for detailed study in the Tier 1 EIS. The ultimate decision about whether a non-highway alternative is "reasonable" (as defined in NEPA) will be made by FHWA and INDOT. In making that decision, FHWA and INDOT will not automatically reject an alternative simply because that alternative would require changes in current laws, policies, or funding levels; however, depending on the circumstances, those factors may be considered as part of the overall assessment of whether an alternative is reasonable.

I hope you find this response helpful in clarifying the role of the CUED panel and the overall approach we are taking in addressing the link between transportation infrastructure and economic development in Southwest Indiana.

If you have further questions, please do not hesitate to contact me. I look forward to continuing to work with you as we move forward with this important project.

Sincerely,

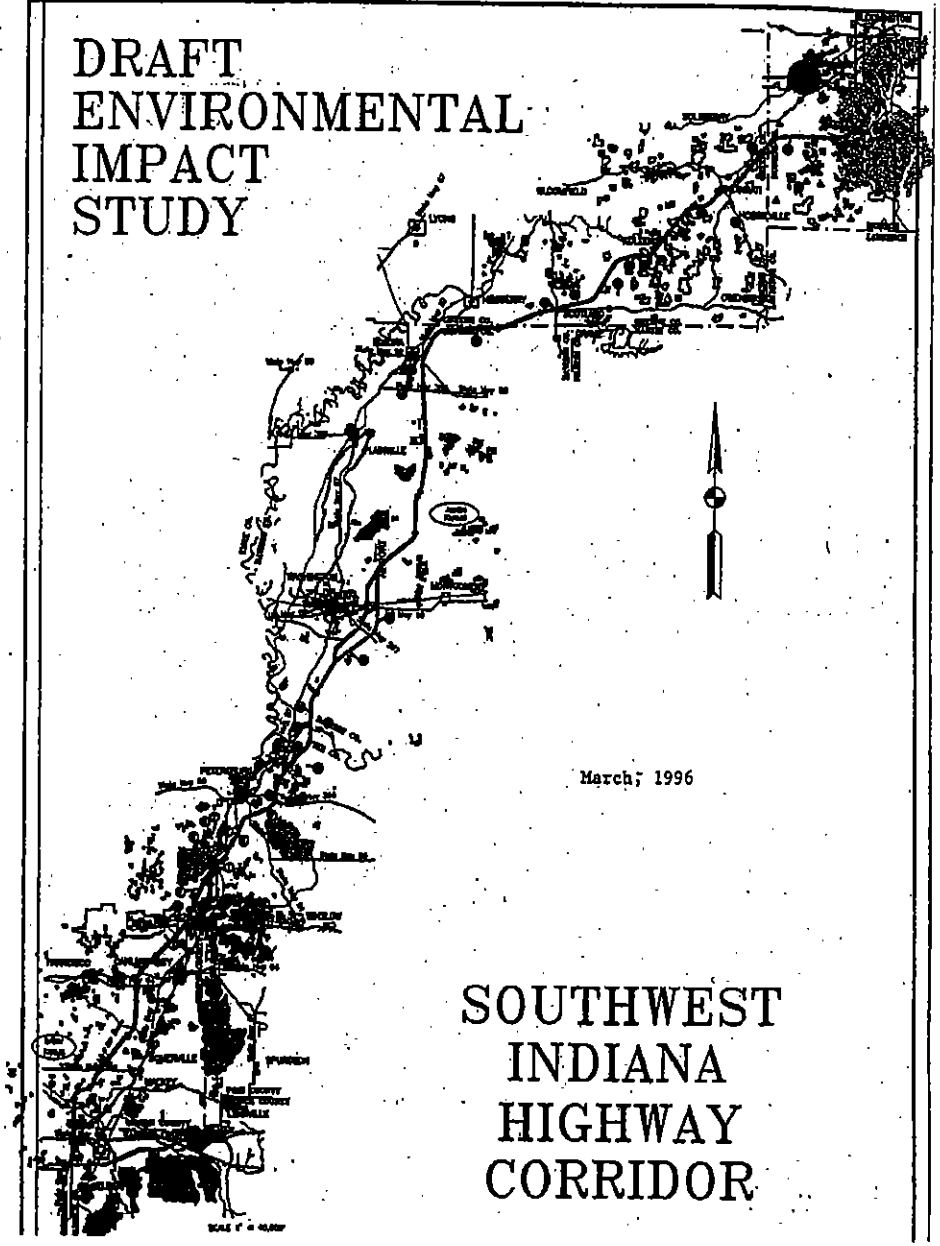


Steve Cecil, Deputy Commissioner of
Planning and Intermodal Transportation

cc: Cristine Klika, INDOT
William Huff, Esq., INDOT
John Baxter, FHWA
Ed Gilliland, CUED
Vince Bernardin, BLA
Jim Dittoe, Winning Communities, Inc.

ATTACHMENT E

DRAFT ENVIRONMENTAL IMPACT STUDY



March, 1996

SOUTHWEST INDIANA HIGHWAY CORRIDOR

SUMMARY

Over the past years there have been a series of studies conducted regarding improved highway access for Southwestern Indiana. The most recent study, the Southwest Indiana Highway Feasibility Study, was completed in February of 1990. This feasibility study considered three corridors in Southwest Indiana : Indianapolis to Evansville (Corridor A); Bloomington to Bedford to Loogootee and then south to the Ohio River bridge at Owensboro, Kentucky (Corridor B); and Bloomington to Bedford and then south through the area east of Patoka Lake to I-64 (Corridor C).

These alternative corridors were evaluated in terms of engineering, transportation planning, economic development, environmental impacts, and costs. Using the realistic economic forecasts, Corridor A with a freeway design was the only alternative with a benefit/cost ratio over 1.00 (with a ratio of 1.28). Corridors B and C both had benefit/cost ratios below 1.00.

The Indiana Department of Transportation (INDOT) selected Corridor A for further study. This further study was to prepare an environmental impact statement for the proposed corridor. The project was initially divided into three sections.

Section 1 of the proposed corridor begins at SR 37 in Monroe County on the southwest side of Bloomington. The highway will head in a southwesterly direction ending in Daviess County at SR 57 south of Newberry. Section 2 begins in the vicinity of SR 57 near Newberry and extends to an area near Petersburg in northern Pike County. The alignment of the roadway may incorporate parts of, and/or parallel SR 57. Section 3 begins near Petersburg in northern Pike County and extends to the I-64/I-164/SR 57 interchange.

As part of corridor location process, an Environmental Overview was prepared for Sections 2 and 3. These Overviews identified preliminary corridors and evaluated these corridors from social, economic, environmental, and engineering concerns. An Environmental Impact Statement was to initially be prepared for only Section 1. This was changed so that the entire corridor could be discussed in a single document.

This environmental impact statement covers the entire Southwest Indiana Highway Corridor from the I-64/I-164/SR 57 interchange in Warrick county to SR 37 southwest of Bloomington. This document describes the alternatives analysis for the entire corridor. For Section 1, selecting a set of reasonable alternatives involved first identifying the environmental resources in portions of Monroe, Greene and Daviess Counties. Three hundred and eighty-two square miles of land were evaluated for environmental resources. This evaluation included a literature search in conjunction with field work. The field work was to substantiate collected environmental data and secondly, to generate base-line data.

This evaluation identified nearly 4,000 environmental avoidance areas. These areas included such concerns as geological (shaft and surface coal mines, quarries, oil wells, gas storage wells, sinkholes, limestone reserves); ecological (published caves, unpublished caves, wetlands, endangered plants/animals, nature preserves, parks, registered areas, natural areas, classified forests, classified wildlife areas); archaeological sites; historical buildings; and public concern (cemeteries, landfills, hazardous waste sites, schools) areas.

The need for the Southwest Indiana Highway Corridor includes economic development, system linkage and highway continuity, safety improvements, traffic improvements, and a major investment analysis. Counties such as Pike, Daviess, and Greene who lack a good 4 lane roadway have a difficult time attracting new businesses and industry. The Preferred Alternative will benefit economic development by providing a faster, safer and more direct route for southwestern Indiana. With a 4 lane freeway type of highway these counties will be able to compete with the rest of Indiana for industry and jobs.

The Southwest Indiana Highway Corridor would create economic development benefits for Southwest Indiana as well as for the entire State of Indiana. The economic impacts include business expansion, business attraction, and tourism. A total of 4,415 new jobs would be generated by a Southwest Indiana Highway Corridor. Of these 4,415 jobs, 442 would be from the expansion of existing businesses; 585 jobs would be new tourism jobs; and 3,388 would be from the attraction of new business. These figures are for the entire State and for a 30 year time period from 2005 to 2034. The "No Build" alternative would realize none of these economic benefits.

Disposable personal income would increase by $2.560 billion over the 30 year period. The overall output (sales) statewide would increase $12.218 billion over the 30 year period. The benefit/cost ratio for the Southwest Indiana Highway would be 1.542. This assumes a 7% discount rate and a 30 year time period.

System continuity and highway linkages are important for economic development. Studies have shown a close link between multi-lane highways and economic development. The lack of a 4-lane road connecting Bloomington and Evansville on Indiana's highway system is recognized and identified in the National Highway System. The Southwest Indiana Highway Corridor is currently identified as a proposed High Priority Route on the system.

The proposed highway alternative is projected to reduce accidents. As an interstate type highway, the Southwest Indiana Highway Corridor would reduce the total number of accidents in Southwest Indiana by approximately 9,458 over a 30 year period from 2005 to 2034. The number of accidents involving a fatality would decline by 61. Injury accidents would drop by 5,892 and property damage accidents would be reduced by 3,503.

In analyzing the existing and future traffic flow, the existing roads serving this area including SR 57, US 231, SR 45, and SR 54 were studied. The existing traffic flow is for 1994 while the future traffic flow is forecasted to the year 2020. The Southwest Indiana Highway Feasibility Study developed a computer travel model and associated forecasts.

Assuming a new Southwest Indiana Highway Corridor is built, the year 2020 traffic volumes drop on SR 57, US 231, and SR 45/SR 54. The Levels of Service for these highways would improve. On US 231 from I 64 to SR 64, the traffic volumes decline from 11,400 ADT to 9,800 ADT and the Level of Service improves from E to D. From SR 64 to US 50, the traffic volumes on US 231 decline from 8,900 ADT to 7,500 ADT and the LOS improves from D to C. From Bloomfield to Bloomington, the traffic volumes on SR 54 and SR 45 decline from 16,200 ADT to 4,700 ADT and the LOS improves from F to B.

A new 4-lane freeway type of facility will significantly reduce the year 2020 traffic on many of the existing roads that serve Southwest Indiana and improve the Level of Service on these roads. This type of facility would provide a savings of approximately 6,000 daily automobile hours of travel and 1,300 daily truck hours of travel.

ATTACHMENT F

The Evansville Courier
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Redefining role of I-69 called key to its future

Highway focus has shifted from trade to jobs

By DOUG SWORD
Courier Indianapolis bureau

INDIANAPOLIS — If at first you don't succeed, revise, revise again.

In December 1995, the Indiana Department of Transportation was told it couldn't justify building a highway from Evansville to Bloomington with a study that showed it would be well worth the nation's while to extend Interstate 69 from Indianapolis to Texas and the Mexican border.

The state went back to the drawing board.

In December 1996, the Transportation Department was told by the U.S. Environmental Protection Agency that its study of the route was "seriously deficient" and that there were perhaps other ways to bring economic development to Southwestern Indiana.

The state went back to the drawing board.

What the state came up with, and announced last Saturday, can be seen as a smart, hard-won approach or, as opponents see it, little more than bureaucratic sleight of hand. Transportation Department officials say they will rewrite the "purpose and need" statement for the highway, changing the very need for building it.

The justification for the highway will no longer be as an international trade corridor or as a way to bring economic development to the general Southwest Indiana region. It will now be, very specifically, to provide an economic boost to the communities along the highway's route.

If this new approach is accepted, and state transportation Commissioner Curt Wiley says seven months of talks with federal officials have left him "very comfortable" with the approach, it would remove the luster from opponents' main objection to the highway. Detractors say it would be much cheaper to upgrade Interstate 70 and U.S. 41 rather than build a new 81-mile highway.

Since the new reason for building the highway is largely to bring economic development to Gibson, Pike, Daviess and Greene counties, the U.S. 41 alternative can't fulfill that purpose because it doesn't go through three of them.

While critics can still push for the U.S. 41 alternative, they may not get anywhere. The Federal Highway Administration considers the matter settled.

"It's no longer a legitimate alternative," Arthur Fendrick, division administrator for federal highways, says of an Interstate 70-U.S. 41 route to Evansville. As ISTA's suggestion and with the Federal Highway Administration's agreement, the need for the highway is not to provide the fastest route from Evansville to Indianapolis, but is instead to bring economic development along the route, he said.

What happens next is the state will have Evansville's Bernardin, Lochmueller & Associates, probably with the help of an economic development consultant, put together a "supplemental" to the highway's draft environmental impact statement. A draft statement must go through public hearings, a comment period and federal review before it can be made final and construction can begin.

The supplement will include a rewrite of the highway's "purpose and

See I-69 on Page A13

Supporters' lobbyist tab has grown to $480,000

By GERARD SHIELDS
Courier Washington bureau

WASHINGTON — Supporters of the plan to extend Interstate 69 through Evansville have spent $480,000 on Washington lobbyists hired to persuade Congress to approve the project.

The two-year spending by the nonprofit I-69 Mid-Continent Highway Coalition of Indianapolis was recently disclosed in midyear federal lobbying reports that show the high-stakes gamble for federal road money.

Last week, the House Transportation Committee voted to delay for up to nine months any decisions on the $103 billion transportation bill in which up to $1 billion for I-69 is being requested.

That means the coalition will be forced to continue shelling out money for lobbyists through next year.

The coalition's half-million dollar commitment has already raised eyebrows among groups across the nation competing for the highway dollars.

See LOBBYIST on Page A13

I-69

Continued from Page A1

need" focusing more on economic benefits. It will also compare benefits the highway will generate with other development tools, such as the building of industrial parks. The supplement is expected to be completed by the first quarter of next year with public hearings afterward.

The aim of this new strategy seems to be to eliminate the best route and gain approval for what has become the politically popular route, claims Jim Gillooly, whose family owns Colbert Farms near Washington, Ind.

Gillooly calls the state's strategy "phony stuff" and says regardless of the new justification for the highway, opponents will continue to push for an upgrade of U.S. 41, which he says is a cheaper, more environmentally sound approach that doesn't destroy thousands of acres of farmland as a new highway would. Gillooly's farm would be split diagonally by one of the highway's proposed routes.

The reason for building the highway has gone from capitalizing on the North American Free Trade Agreement to bringing a few jobs to Pike and other counties, complains Tom Tokaraki, a longtime highway opponent with C.A.R.R., Citizens for Appropriate Rural Roads.

The reason for building the highway has gone from capitalizing on the North American Free Trade Agreement to bringing a few jobs to Pike and other counties, complains one longtime highway opponent.

Tokaraki points out that the draft statement found Bloomington and Evansville would reap almost all of the highway's rewards. Only about four jobs a year would be created in each of the rural counties, or, as Tokaraki computes, about $200,000 a job, nearly triple what local and state government paid to lure Toyota to Gibson County.

"That contradicts everything they've said for years about interstate highways," Tokaraki said of the state's new narrow focus on job creation.

But it's impossible to tell just how many jobs a new interstate would create in the rural counties, says David Perlini, executive director of the Indiana Department of Commerce. Perlini, who negotiated state deals with Toyota and AK Steel, was called in during talks with federal officials to explain the highway's value to lightly developed central Southwestern Indiana.

"Rather than try to argue the theories, I argued the realities," Perlini said. There is an "extraordinary correlation" between the presence of a nearby interstate and where businesses choose to locate, he said.

Upgrading U.S. 41 to an interstate would bring development to that corridor where development is already occurring. "But the entire center section of Southwestern Indiana would not benefit," he said.

Building the highway as proposed would maximize development both along that corridor and along U.S. 41, he says.

While EPA has been in discussions with the state, the agency is still required to review the project and its new supplement, says Michael MacMullen, manager of the EPA Chicago office's federal activities program.

The highway's "purpose and need" apparently will be "very different," MacMullen says. Since EPA hasn't seen the new purpose statement or the supplemental information, MacMullen said, he has no idea yet what the agency's judgment of the new material will be.

Another criticism of the highway also lost some of its luster last week when the Federal Highway Administration determined Bloomington and Evansville to be "logical termini" for the proposed interstate. Opponents have complained that the highway's $730 million price tag is way too low because it ignores the cost of upgrading Indiana 37 between Bloomington and Indianapolis.

But Indiana 37 will become a busier road with or without the new highway, says Federal Highway Administration's Fendrick.

"As far as I'm concerned, I'm convinced Bloomington is a logical terminus and so is Evansville," he said.

ATTACHMENT G

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FRANK O'BANNON, Governor
CURTIS A. WILEY, Commissioner

FOR IMMEDIATE RELEASE
Wednesday, November 18, 1998

Writer's Direct Line
(317) 233-4675

TRUE INTERSTATE 69 TO EMERGE FROM EXPANDED SOUTHWEST INDIANA HIGHWAY

BLOOMINGTON – Saying, "It's the right thing to do," Indiana Department of Transportation (INDOT) Commissioner Curt Wiley today announced the Southwest Indiana Highway Corridor Project will be expanded to include the entire Evansville to Indianapolis corridor.

Over the past two years, INDOT has made considerable progress toward refining the preferred alternative for the Evansville to Bloomington portion of the project. INDOT has also responded to the thousands of comments that it has received on the Draft Environmental Impact Statement. "In consultation with the Federal Highway Administration, I have decided that the scope of the project must be expanded to encompass the entire corridor from Evansville to Indianapolis. This will truly make the Southwest Indiana Highway Corridor an extension of I-69," said Commissioner Wiley.

Commissioner Wiley met personally with United States Transportation Secretary Rodney Slater last week to discuss Interstate 69 and the expansion of the corridor study. The Southwest Indiana Highway Corridor is a federal high priority project intended to be a link in the expansion of Interstate 69 from Canada to Mexico. Congress has earmarked funds for Indianapolis to Evansville through Bloomington.

Bloomington Mayor John Fernandez has urged INDOT to expand the Supplemental Draft Environmental Statement (SDEIS). "A link between Evansville and Bloomington would be a great step forward in improving the transportation options in southwest Indiana," said Mayor Fernandez. "But the next logical step, an improved interstate grade link continuing on to Indianapolis, should not have to wait."

The first step in expanding the SDEIS will be to prepare a revised statement of the project's purpose and need. This statement will more clearly explain the basic objectives of the entire project, which are to improve economic development opportunities and the highway network of southwestern Indiana.

Clearly one major objective of this project is to provide a continuous interstate link between Evansville and Indianapolis as part of the future I-69 corridor. But this project has the potential to provide much more than an improved link between these two cities; it is an opportunity to strengthen the entire highway network in southwestern Indiana. Therefore, in addition to considering I-69's role in connecting Evansville and Indianapolis, the study will examine I-69's role as the backbone of a regional highway network serving all of southwest Indiana.

From this perspective, several regional objectives must be considered:

- The need for an improved, higher capacity highway connecting Indianapolis and Bloomington
- The need for a new highway connecting Evansville and Bloomington, the two largest population centers in southwestern Indiana.
- The need for improved connections among the major two-lane and four-lane (non-interstate) highways that serve smaller population centers in southwest Indiana. These include the following routes, all of which have been designated as part of the National Highway System (NHS).

  U.S. 231 serving Jasper, Huntingburg, and Rockport. This route is being improved to four lanes from Rockport to I-64, and additional improvements are planned north of I-64 to Jasper and Huntingburg.

  The U.S. 50 corridor serving Vincennes, Washington, Bedford, and Seymour is being improved to four lanes from Vincennes to Washington.

  In addition, the State Road (SR) 46 corridor serving Spencer, Ellettsville, Nashville, and Columbus is being improved to four lanes from Ellettsville to Bloomington.

- The need for improved access to the Crane Naval Surface Warfare Center, which is a major economic asset for southwestern Indiana. It employs 3,000 people, many of them civilians, and has enormous potential to stimulate economic growth in surrounding areas.

The second step will be to identify a range of options for Indianapolis to Evansville routes to determine if additional alignments meet the project's purpose and need. Alignments that meet the project's objectives will be carried forward for further investigation; alignments that do not meet the purpose and need will be eliminated at this point. At this stage, the U.S. 41/I-70 alternative will be considered along with other potential alternatives in order to assess its ability to meet the project's objectives.

The third step will be to analyze those alternatives that are carried forward. A detailed analysis of both environmental and economic impacts will be conducted on each alternative.

Upon completion of the revised SDEIS, INDOT will distribute the document for public comment. While the exact time required to complete the revised document would depend upon the number of alternative routes studied, it is estimated the work can be completed within the next two years.

"This will mean some delay in the current timetable. However, I believe this approach will accelerate the completion of the Evansville to Indianapolis project by completing the federally mandated studies on the entire route at the same time," said Commissioner Wiley.

-30-

Contact: Steve Cecil, INDOT Chief of Pre-Engineering and Environment, (317) 232-5468
Roger Mauning, INDOT Public Information Director, (317) 233-4675
Ryan Travis, INDOT Vincennes District Public Information Officer, (317) 233-4676

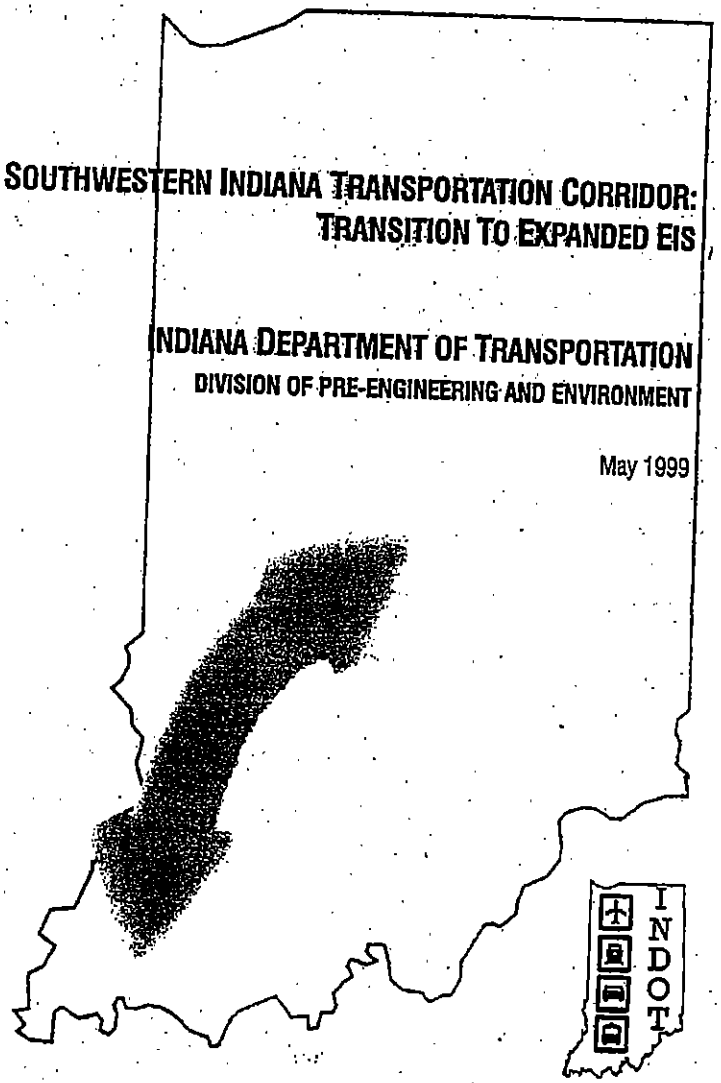
ATTACHMENT H

SOUTHWESTERN INDIANA TRANSPORTATION CORRIDOR: TRANSITION TO EXPANDED EIS

INDIANA DEPARTMENT OF TRANSPORTATION

DIVISION OF PRE-ENGINEERING AND ENVIRONMENT

May 1999



APPROACH TO THE EXPANDED STUDY

The balance of this paper describes the approach that FHWA and INDOT have developed for completing the expanded EIS for the Southwestern Indiana Highway Project. Rather than describing a "work program," the paper is organized by broad "issue area" to facilitate discussion.

There are five such broad issue areas. The first set of issues relates to the intent and scope of the project. The second addresses the "tiered" structure of the study process. The third pertains to the transition from the 1996 DEIS to the expanded study. The fourth is a mix of other procedural issues. Finally, the fifth area deals with issues relating to the study's "technical" methods and content.

* * *

ISSUE 1: INTENT AND SCOPE OF THE PROJECT

The decision in November 1998 to include the Bloomington-to-Indianapolis corridor as part of the ongoing EIS for the Southwest Indiana Highway Project significantly changed the scope of the study. The change in scope can best be understood by focusing on three distinct issues: (1) the definition of the proposed action, (2) the purpose and need for the proposed action, and (3) the range of alternatives that will need to be considered.

ISSUE 1.1: PROPOSED ACTION

What is the proposed action?

The proposed action is INDOT's proposal to complete a fully access controlled, four-lane highway from Indianapolis to Evansville via Bloomington. (Note: The proposed action provides the starting point for the environmental study, which must consider a range of alternatives for achieving the underlying objectives of the proposed action.)

ISSUE 1.2: PURPOSE AND NEED

How will the purpose and need for the proposed action be defined?

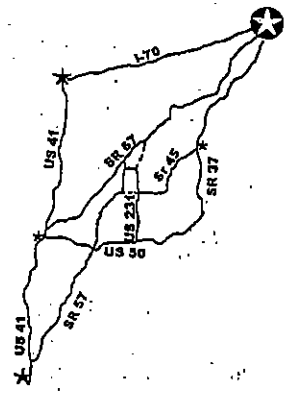
The purpose and need for the proposed action will be defined in detail in the expanded EIS. In essence, it will consist of three inter-related components:

- *Strengthening the Highway Network in SW Indiana.* The SW Indiana Highway is intended to strengthen the highway network in Southwest Indiana by providing improved linkages among the existing highway routes in the region, particularly National Highway System routes, and by providing more direct connections and addressing needs for additional capacity on routes linking the region's major population centers, particularly metropolitan areas with populations of 50,000 or more.

- *Stimulating Economic Growth in SW Indiana.* By strengthening the highway network, the SW Indiana Highway is intended to stimulate economic growth in Southwest Indiana over the long term. The project is not narrowly directed toward alleviating economic hardships in particular counties or cities. Rather, it is intended to enhance the long-term economic growth of Southwest Indiana as a whole, both by strengthening existing centers of economic activity and by creating new opportunities where none currently exist.

- *Completing the Indiana Portion of I-69/Corridor 18.* The SW Indiana Highway is intended to complete the Indiana portion of Corridor 18, a federally designated "high-priority corridor" that will eventually become a continuous highway linking Canada to Mexico. While this project will serve an important transportation and economic development purpose even if Corridor 18 as a whole is not completed, the national objective of completing Corridor 18 as a continuous north-south trade corridor running through Indiana is an additional need that must be taken into account when evaluating alternatives for this project.

FIGURE 2: ROUTE COMBINATIONS



To assist decision-makers and the public in reaching an informed decision on the project, the new study will develop qualitative and quantitative criteria for evaluating the ability of the alternatives to achieve each of these objectives. These criteria will not dictate the selection of a particular alternative; instead, they will provide a framework for identifying reasonable alternatives and for comparing those alternatives to one another.

ISSUE 1.3: RANGE OF ALTERNATIVES

What range of alternatives will be considered in the study?

FHWA and INDOT will consider a wide range of alternatives, including alternatives that differ significantly from the proposed action. In particular, the study will give significant attention

ATTACHMENT I

Chapter 2: Purpose and Need
Executive Summary

Note to readers: This purpose-and-need statement is a work in progress. The findings and conclusions expressed in this draft are subject to change as the study progresses. The final version of the purpose-and-need statement will be published in the Final Environmental Impact Statement.

This chapter contains the purpose-and-need statement for the proposed Evansville-to-Indianapolis section of I-69. The purpose-and-need statement contains five mains parts:

- Policy Framework: describes the key policy decisions affecting this project
- Needs Assessment: summarizes the results of a comprehensive assessment of transportation and economic needs in a 26-county area of Southwest Indiana
- Public and Agency Input: provides response to key issues raised by agencies and the public during development of the purpose-and-need statement
- Project Goals and Performance Measures: defines the goals of the project and performance measures for use in evaluating alternatives' ability to achieve those goals
- Next Steps: Evaluating Alternatives: explains how the purpose-and-need statement will be used to screen alternatives and to select a preferred alternative.

Policy Framework

The proposal to complete the proposed action has been shaped by a series of policy decisions over the last 10 years at the federal and state level. These policy decisions include:

Key Federal Policies

- Focus federal aid on the National Highway System (NHS) – a 160,000 mile system that includes only 5% of the nation's highways but carries 40% of the traffic.
- Facilitate completion of I-69 as an Interstate highway from Canada to Mexico, along the route specified by Congress, in order to promote international and interstate trade and facilitate economic development along the I-69 corridor.

did it not designate Corridor 18 as an Interstate, it did not even specifically require the corridor to be completed as a four-lane highway.

In TEA-21, following the completion of a series of feasibility studies for Corridor 18, Congress specifically designated Corridor 18 as an Interstate highway: the law stated that Corridor 18 (and Corridor 20) "shall be designated as Interstate 69 (I-69)."[7] It is important to note that TEA-21 does not require states to complete I-69: if an individual state does not want to complete its portion of I-69, it will not be compelled to do so. However, the legislation means that future planning for Corridor 18 should proceed on the assumption that it will be developed as a continuous Interstate highway (I-69) linking Canada to Mexico.

Following TEA-21, FHWA issued further guidance concerning the Interstate status of Corridor 18. In a Federal Register notice published on December 8, 2000, FHWA announced that it "has initiated the project planning, development, and decisionmaking process for numerous transportation projects related to a transcontinental highway corridor, designated as I-69."[8] In the notice, FHWA stated that "studies considering alternative transportation modal choices have identified that an interstate highway facility would best meet the needs as identified."

c) Goals of National I-69 Project

In February, 2000, a Statement of Purpose and Need was issued for the national I-69 project by the Corridor 18 Steering Committee, a group composed of representatives from eight state departments of transportation (including INDOT) and the FHWA. The February 2000 purpose-and-need document defined the following "overall goals" for I-69:

> Goal 1: To improve international and interstate movement of freight and people by ensuring a safe transportation system that is accessible, integrated, and efficient while offering flexibility of transportation choices in mid-America.
>
> Goal 2: To enhance the regional and local transportation systems by providing transportation capacity to meet current and future needs.
>
> Goal 3: To facilitate economic development and enhance economic growth opportunities domestically and internationally through efficient and flexible transportation with particular emphasis being given to economic growth in the Lower Mississippi Delta Region.

7 TEA-21, § 1211 (i) (3) (B) ("The routes referred to in subsections (c)(18) and (c)(2) [of ISTEA] shall be designated as Interstate Route I-69.").

8 FHWA, "Announcement of I-69 Status," Federal Register, Vol 65, No. 237 (Dec. 8, 2000).

b) Population Trends

For the last 40 years, Indiana as a whole has lagged significantly behind the rest of the United States in population growth. Between 1960 and 1999, United States population grew at an annual rate of 1.06%.[36] By contrast, between 1960 and 1999, the population of Indiana grew at an average rate of 0.62%.[37]

The population of the Study Area outside of the Indianapolis MSA (excluding Marion, Hendricks, Morgan, and Johnson Counties) grew even less during this period, increasing by an annual rate of only 0.52%.[38] In other words, population growth in Southwest Indiana outside of the Indianapolis metropolitan area has lagged behind even the rest of Indiana, growing at slightly less than one-half the national rate. A low rate of population growth is an indicator of the lack of economic opportunity, suggesting that many individuals are relocating to other areas where economic opportunity is greater. Another indication of the lack of economic opportunity is the lower rates of job growth in the Study Area, which are described below. Figure 14 shows these population trends.

c) Employment Trends

During the last quarter century, both Indiana as a whole, and the Study Area itself, have lagged significantly behind the rest of the United States in employment growth. Between 1974 and 1999, employment in the United States grew at an average annual rate of 1.74%.[39] By contrast, employment in Indiana grew at an average annual rate of 1.12% during the same 25-year period.[40] Employment growth in the Study Area outside of the Indianapolis MSA grew at a

36 United States population in the 1960 Census was 180,671,158. Estimated 1999 population was 272,690,813. Source: Population of Counties by Decennial Censuses: 1900 to 1990, and Population Estimates of Indiana counties for 1999, by US Census Bureau. All growth rates cited are annual compounded growth rates.

37 Indiana's population in the 1960 census was 4,662,000. Estimated 1999 population was 5,942,901. (Sources: *Population of Counties by Decennial Censuses: 1900 to 1990; and Population Estimates for Indiana Counties for 1999; both by US Bureau of the Census*).

38 Population of the Study Area excluding the Indianapolis MSA grew from 736,014 in 1960 to an estimated 901,491 in 1999. (Sources: *Population of Counties by Decennial Censuses: 1900 to 1990; and Population Estimates for Indiana Counties for 1999; both by US Bureau of the Census*).

39 Number of persons employed in the United States grew from 86,794,000 in 1974 to 133,488,000 in 1999. Source: Indiana Department of Workforce Development, Labor Market Information Services

40 Number of persons employed in Indiana grew from 2,258,000 in 1974 to 2,984,600 in 1999. *(Source: Indiana Department of Workforce Development, Labor Market Information Services.)*.

Table 12 – Poverty Rates in Selected Study Area Counties

County	1997 Poverty Rate	Rank in Indiana
Crawford	15.4%	1
Vigo	14.6%	2
Knox	14.5%	3
Sullivan	14.1%	4
Daviess	13.3%	9
Orange	13.2%	11
Monroe	12.0%	16
Marion	12.0%	17
Vanderburgh	12.0%	18
Owen	11.8%	20

2. The Role of Transportation Systems in Supporting Economic Development

The analysis of economic conditions in Southwest Indiana clearly indicates a need to enhance economic development opportunities. Therefore, it is important to consider the separate question of whether transportation improvements can help to address that need.

The relationship between transportation improvements and economic development is highly complex. It is not possible to predict with certainty whether a particular project will cause economic development to occur, much less to predict where, how, and when it will occur. However, it is possible to draw general conclusions about the potential role of transportation projects in creating opportunities for economic growth.

a) General Principles

The opportunity for economic growth in a region is directly affected by the cost of doing business. High costs of doing business tend to limit productivity, which makes businesses less competitive. Lower costs tend to produce greater sales, profits, employment, and an enhanced business climate. An improved business climate, in turn, benefits residents throughout the region.

One way to reduce the cost of doing business, and thus enhance opportunities for economic growth, is to reduce transportation costs. It is important to note, in this context, that even relatively small reductions in transportation costs – when measured for each individual trip – can have large overall benefits for a region's economy. The reason is that a small benefit, when multiplied over a large number of trips, results in a large net benefit to the economy.

ATTACHMENT J

Project Study Area

Contact Information:

Address written comments to:

Annette Coffey, P.E.
Director
Kentucky Transportation Cabinet
Division of Planning
125 Holmes Street
Frankfort, KY 40622

Or you may contact by phone:

Jim Wilson
Project Manager
Kentucky Transportation Cabinet
Division of Planning
(502) 564-7183
jimmy.wilson@mail.state.ky.us

You may also look for project information at:
http://www.kytc.state.ky.us/planning/index.shtm.

Environmental Research and Analysis

The environmental overview seeks to identify known environmental issues based upon publicly available data sources that can be obtained and developed for analysis purposes. Study team members will conduct a cursory field review (windshield survey) along the existing corridor and connecting side roads as needed. In addition, information relating to potential environmental issues will be obtained from the public via public questionnaires as well as federal, state and local databases. Results of the environmental overview are then mapped using Geographic Information System (GIS) software.

The Environmental Overview of the corridor will be documented in a separate technical report. Where appropriate, generalized recommendations will be offered on future measures that can be taken to avoid, minimize, and/or enhance the potential effects of corridor development on known environmental issues. Environmental concerns should be reduced since the majority of corridor improvements will be made within the existing right-of-way or immediately adjacent to the existing parkways.

Environmental Factors to be Identified and Analyzed

- *Social, Economic and Environmental Justice*
- *Historic and Archaeological Sites*
- *Natural Features and Waterways*
- *Prime and Unique Farmland*
- *Floral and Faunal Communities*
- *Threatened and Endangered Species*
- *Hazardous Materials, UST's, Oil and Gas Wells*
- *Geotechnical, Karst and Mining*
- *Air Quality*
- *Noise*
- *Visual Environment*

Eddyville To Henderson Planning Study

The Kentucky Transportation Cabinet (KYTC) is undertaking this planning study for the I-69 corridor from Eddyville, Kentucky to Henderson, Kentucky to determine more definite and detailed alternatives for this segment of the new I-69 corridor. This study will identify and evaluate potential alternatives for improving the Wendell H. Ford (Western Kentucky) and Edward T. Breathitt (Pennyrile) Parkways from I-24 near Eddyville to KY 425 at Henderson. It will identify and evaluate environmental factors, and social and economic constraints, as well as document and consider public and official comments, suggestions, and insight.

The planning study area passes through portions of Lyon, Caldwell, Hopkins, Webster, and Henderson Counties [illegible] coordinate with the ongoing study [illegible] I-69 corridor in the Evansville-Henderson area. The Evansville-Henderson [illegible] the proposed location for the Ohio River [illegible] will likely have a southern terminus at the Edward T. Breathitt (Pennyrile) Parkway south of Henderson, Kentucky. The Eddyville to Henderson study [illegible]

[illegible]

Components of the Planning Study

Transportation Network — Information on highways and traffic conditions within the corridor will be collected and analyzed. This includes obtaining highway system data available from the KYTC, collecting aerial photography from available sources, and assembling United States Geological Survey (USGS) topographic Global Information System (GIS) files and digital orthophotography for the study area.

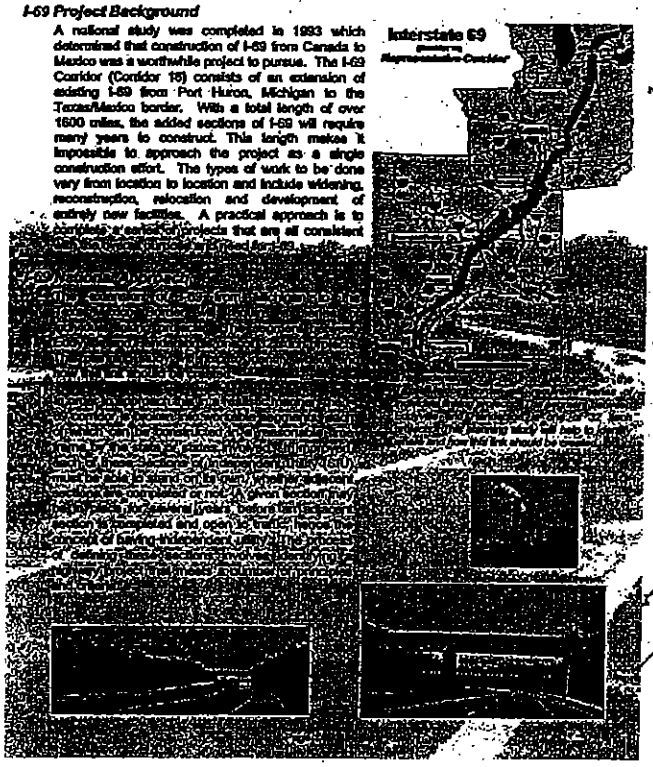
Public and Agency Input — Throughout the study, there will be meetings with both the public and other stakeholders and resource agencies. These meetings will be used to gather necessary information and input and to keep interested parties up to date on the study's findings and progress. To assist in keeping the public and agencies informed [illegible] KYTC's Division of [illegible] http://www.kytc.state.ky.us/planning/index.shtm. This website will be updated on a regular basis as new information becomes available.

[illegible] Using an [illegible]

[illegible]

I-69 Project Background

A national study was completed in 1993 which determined that construction of I-69 from Canada to Mexico was a worthwhile project to pursue. The I-69 Corridor (Corridor 18) consists of an extension of existing I-69 from Port Huron, Michigan to the Texas/Mexico border. With a total length of over 1600 miles, the added sections of I-69 will require many years to construct. This length makes it impossible to approach the project as a single construction effort. The types of work to be done vary from location to location and include widening, reconstruction, relocation and development of entirely new facilities. A practical approach is to complete a series of projects that are all consistent



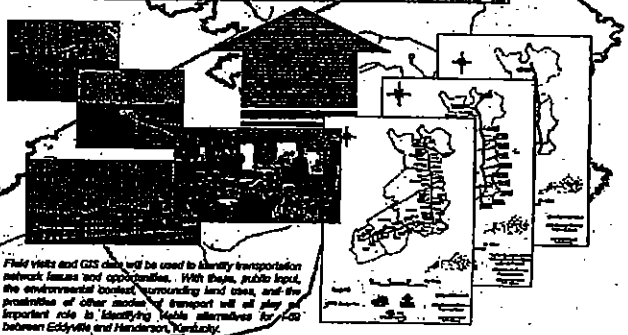
Comparing Alternates

The comparing of alternatives will be based on all gathered information, as well as input received throughout the planning process. Using GIS and an array of data sources, information on the current network can be gathered and used to identify potential alternates for the Eddyville to Henderson I-69 segment. After selecting a set of potential alternatives, they can be evaluated in terms of cost, potential impacts, potential benefits and public desires.

Evaluation

The alternative improvements will be evaluated relative to environmental issues, travel/economic benefits, public and resource agency comments, costs and engineering feasibility. Current design standards along the parkways do not meet typical Interstate design standards. In particular, major bridges and interchanges will need to be considered and cost estimates developed for expanding or replacing these features. These structures are of special concern due to the funding required to bring the structures up to Interstate design standards. More specifically, the widening and increasing of vertical clearance create major concerns.

Identification of Alternative Improvements



Field visits and GIS data will be used to identify transportation network issues and opportunities. With these, public input, the environmental context surrounding land uses, and the practicality of other modes of transport will all play an important role in identifying viable alternatives for I-69 between Eddyville and Henderson, Kentucky.

Current Corridor Data

Logical Termini

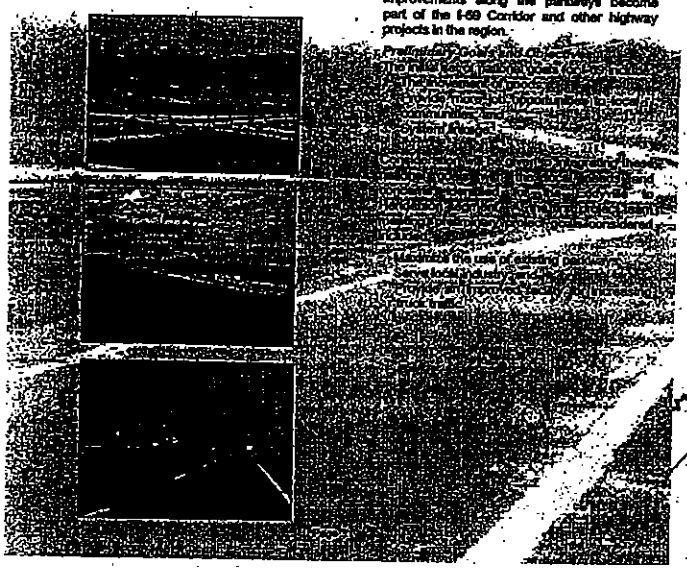
The termini, or beginning and ending, of this section were selected to permit consideration of alternative alignments south of Henderson while connecting with I-24 near the end of the Wendell H. Ford (Western Kentucky) Parkway. Options will be considered for improvement of the Edward T. Breathitt (Pennyrile) Parkway and the Wendell H. Ford (Western Kentucky) Parkway to I-24 near the Tennessee River and the Land Between-the-Lakes.

Independent Utility

This section has independent utility because it permits analysis of a southwest-to-northeast Interstate routing across western Kentucky connecting I-24 and the Henderson Bypass (KY 425). It would provide a usable section of Interstate-type roadway even if other sections of I-69 were not completed.

Other Planned Improvements

This study will also consider how improvements along the parkways become part of the I-69 Corridor and other highway projects in the region.



Public and Agency Input

A series of meetings and coordination activities will occur through the course of this study to inform and obtain input from local officials, public agency representatives, other stakeholders and the general public. It is anticipated that two full rounds of meetings will occur through the course of the project. The first round of meetings will take place at the beginning of the project and seek to obtain input on options and issues.

The second round of meetings will likely occur after the corridor has been studied and evaluated, but prior to the finalization of corridor recommendations. A final wrap-up meeting may be held at the conclusion of the study to present the final recommendations and next steps in the project development process. Input opportunities include:

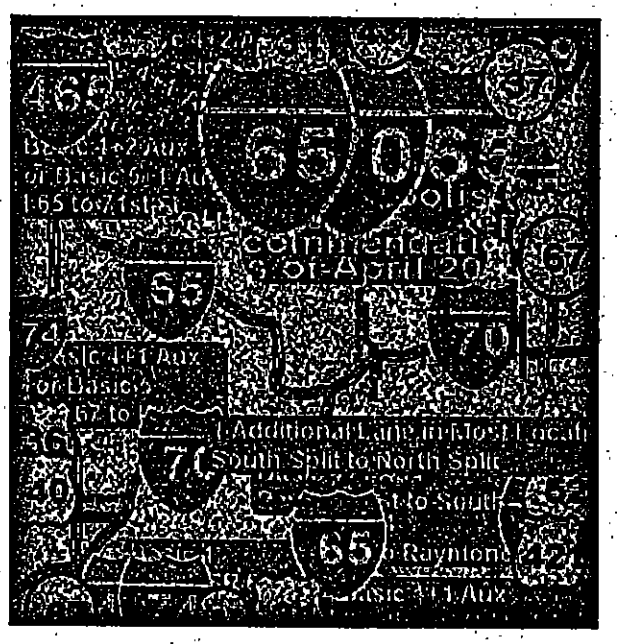
- KYTC Project Team Meetings;
- Local Officials/Local Interest Meetings;
- Public Meetings; and
- Outreach to the general public as well as low-income and minority populations.

Project status reports will be given at these meetings, as well as posted on the KYTC project website.

Through the public involvement process, a set of project goals will be identified that will serve as an evaluation measure throughout the development of the project.

ATTACHMENT K

INDOT 2000 – 2025 LONG RANGE PLAN



INDIANA DEPARTMENT OF TRANSPORTATION

DIVISION OF ENVIRONMENT, PLANNING, AND ENGINEERING

LONG RANGE TRANSPORTATION PLANNING SECTION

System Performance Results (ratio of actual travel time to ideal travel time)

	Indianapolis	Evansville	N W Indiana	S. Bend/Elk.	Fort Wayne	Anderson	Muncie	Kokomo	Lafayette	Bloomington	Terre Haute	Columbus	Richmond	Marion
Indianapolis	[illegible]	1.395	[illegible]	1.321	[illegible]	1.424	1.466	1.343	[illegible]	1.354	[illegible]	[illegible]	[illegible]	1.403
Evansville	1.395	[illegible]	1.292	1.406	1.329	1.404	1.413	1.397	1.400	[illegible]	1.292	[illegible]	1.469	1.406
N W Indiana	[illegible]	1.292	[illegible]	[illegible]	[illegible]	1.331	1.328	1.434	1.463	[illegible]	1.284	[illegible]	1.312	1.503
S. Bend/Elk.	1.321	1.406	[illegible]	[illegible]	1.535	1.444	[illegible]	1.354	1.437	1.370	1.468	1.318	[illegible]	1.488
Fort Wayne	[illegible]	1.329	1.331	1.535	[illegible]	[illegible]	1.422	1.391	1.396	1.283	1.283	1.276	1.320	1.342
Anderson	1.424	1.404	1.328	1.444	[illegible]	[illegible]	1.505	[illegible]	1.386	1.385	1.282	1.450	1.464	1.422
Muncie	1.466	1.413	1.434	[illegible]	1.422	1.505	[illegible]	1.590	1.414	1.418	1.284	[illegible]	[illegible]	[illegible]
Kokomo	1.343	1.397	1.463	1.354	1.391	[illegible]	1.590	[illegible]	1.427	1.421	[illegible]	1.317	1.571	1.517
Lafayette	[illegible]	1.400	[illegible]	1.437	1.396	1.386	1.414	1.427	[illegible]	1.388	1.490	[illegible]	1.291	1.395
Bloomington	1.354	[illegible]	[illegible]	1.370	1.283	1.385	1.418	1.421	1.388	[illegible]	1.466	[illegible]	1.408	1.367
Terre Haute	[illegible]	1.292	1.284	1.468	1.293	1.282	1.284	[illegible]	1.490	1.466	[illegible]	1.440	[illegible]	1.417
Columbus	[illegible]	[illegible]	[illegible]	1.318	1.276	1.450	[illegible]	1.317	[illegible]	[illegible]	1.440	[illegible]	1.551	1.383
Richmond	[illegible]	1.469	1.312	[illegible]	1.320	1.464	[illegible]	[illegible]	1.291	1.408	[illegible]	[illegible]	[illegible]	[illegible]
Marion	1.403	1.406	[illegible]	1.488	1.342	1.422	[illegible]	[illegible]	1.395	1.367	1.417	1.383	[illegible]	[illegible]
Louisville	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	1.270	1.354	[illegible]	[illegible]	1.496	1.488	[illegible]	1.493	1.306
Chicago	[illegible]	1.294	1.404	1.410	1.368	1.358	1.429	1.442	[illegible]	1.278	1.279	[illegible]	1.337	[illegible]
Cincinnati	[illegible]	[illegible]	[illegible]	1.459	1.447	1.464	1.474	1.388	[illegible]	1.357	[illegible]	[illegible]	1.497	1.420
City Total	20,291	22,023	20,494	22,323	21,483	22,692	23,521	23,179	21,147	22,335	21,523	21,356	22,642	23,154

Inter-City Connectivity for the Existing Highway System

In order to assess the mobility levels provided by the inter-city connectivity of the current highway system, fourteen Indiana metropolitan areas were evaluated in terms of point to point actual travel time over existing highways compared to the "ideal" travel time (a straight-line connection at legal speed limits) between the same points. The ratio of actual travel time to ideal travel time for these fourteen communities yield results ranging from 1.107 to 1.860. In the table shown above, areas highlighted in gray represent near ideal travel times. Areas not highlighted correspond to average travel times, and areas highlighted in black denote a deficiency in travel time between two cities. The inter-city connectivity performance provides the basis for the development of the multi-tiered corridor concept of the Statewide Mobility Corridor System.

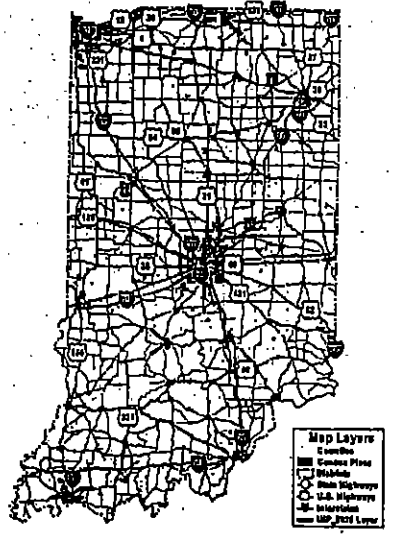
Highway Needs 2000-2025

Traffic growth rates from the Indiana Statewide Travel Demand Model are used to identify future year traffic volumes based upon forecasted socio-economic growth. Over the 2000-2025 time period, statewide population is forecasted to increase 17%, statewide employment is forecasted to increase 30%; however, travel demand is estimated to increase much more rapidly at 62%.

The Highway Economic Requirements System for Indiana (HERS_IN) is one of the system planning tools developed for statewide transportation plan development. HERS_IN is a long-range planning tool for the analysis of highway system investments. HERS_IN is developed from the National Highway Economic Requirements System developed by the Federal Highway Administration (FHWA) for national highway investment analysis.

INDOT has modified the national model for specific application to Indiana's highway system analysis needs in developing HERS_IN. Two alternative levels of highway system investment were evaluated for the year 2000 to 2025. A full needs scenario, which allows the selection of any HERS_IN identified highway improvement, is compared to a no-build alternative to identify the impacts of future travel growth without any additional highway investment.

HERS_IN NEEDS ANALYSIS 2000-2025



preservation activities. Identification of needs, project development, and prioritization for system preservation projects are done through a systematic process involving the District Development Offices and the Central Office Program Development Division, particularly through the bridge, pavement and safety management systems.

The 1995 Statewide Plan

The 1995 Statewide Long-Range Multimodal Transportation Plan entitled *Transportation in Indiana: Multimodal Plan Development for the 1990's and Beyond* was officially adopted by INDOT on December 21, 1994. The 1995 Statewide Plan and the associated Policy Plan component, *Multimodal Issues, Policies and Strategies for the 1990's and Beyond*, remain in effect to provide a comprehensive guide for future INDOT activities. The policy plan identifies the following nine multimodal issue and policy statements:

Transportation System Effectiveness

INDOT will strive to develop an efficient and well-integrated multimodal transportation system. This will be pursued through cost-efficient and cost-effective management and maintenance of existing facilities and services, through appropriate expansion of capacity, and through removal of bureaucratic constraints to efficient and effective transportation of people, goods and freight.

Transportation Safety

INDOT will work to ensure that safety is considered and implemented, as appropriate, in all phases of transportation planning, design, construction, maintenance, and operations. INDOT will strive to raise the safety awareness of both the transportation industry and users of transportation facilities. INDOT will work closely with other local, state, and federal agencies to improve information reporting on transportation crashes, exposure to risks, and trend analysis, in order to identify potential safety problems, analyze potential solutions and implement appropriate actions.

Demographic Changes and Quality of Life

INDOT is committed to develop a transportation system that responds to demographic change and contributes to the quality of life. INDOT will provide safe and efficient intermodal access to the diverse business, recreational, and cultural opportunities of Indiana.

Transportation Finance

INDOT supports adequate and reliable funding for Indiana's transportation system from all sources: federal, state, and local governments; and the private sector.

Intergovernmental Coordination

INDOT will actively solicit greater coordination and cooperation with other agencies, units of government and other stakeholders with the goal of developing a state transportation plan that will guide the selection of investments that offer the best value while providing support for Indiana's continued economic growth.

Economic Development

INDOT has a unique role in sustaining and fostering Indiana's economy and recognizes that policy decisions and transportation infrastructure investments have major effects on economic growth and development. To support economic competitiveness, INDOT will improve upon Indiana's high quality transportation system to reduce the cost of moving people, goods, and freight, connect Indiana with regional, national, and international markets, provide communities with an edge in competing for jobs and business locations, and connect people with economic opportunities.

Natural Environment and Energy

INDOT will establish and maintain a transportation system that is consistent with the state's commitment to protect the environment. INDOT will contribute to energy conservation efforts by promoting efficiency in all modes of travel and by encouraging the most efficient use of transportation systems.

Bicycle and Pedestrian Facilities

INDOT will support non-motorized modes of travel as a means to increase system efficiency of the existing surface transportation network, reduce congestion, improve air quality, conserve fuel and promote tourism benefits. INDOT will work to remove unnecessary barriers to pedestrian and bicycle travel.

New Technology

INDOT will provide leadership for the State of Indiana to develop and deploy advanced transportation technologies. INDOT will embrace a broad-based, comprehensive research program to support all elements of intermodal transportation.

Transportation Trends

I. CHANGE IN DEMANDS ON THE TRANSPORTATION SYSTEM

Changes in Production Processes

In order to compete in the global economy, firms in the United States have in recent years restructured their manufacturing processes with an emphasis towards increased production efficiency and quality. On-site inventory levels have been reduced through the use of a concept that is commonly known as "just-in-time delivery". As its name suggests, just-in-time delivery in the manufacturing process requires that part components and materials be delivered to the manufacturing assembly point as and when needed. This concept reduces the need for costly warehousing and increases the demand for an efficient and reliable transportation system. Finished products are frequently shipped directly to the customer shortly after production.

The rise of the Internet and the application of business-to-business software have also helped to streamline and accelerate the manufacturing process. Orders for products can now be placed and processed in "real time". Computer integrated manufacturing systems can automatically monitor and record part component and material consumption in the assembly

ATTACHMENT L

ATTACHMENT M

Navy official says Crane will stay

By LORETTA BROWN
Times-Mail Staff Writer

BLOOMINGTON — A high-ranking Navy official says he does not lose any sleep over Naval Surface Warfare Center-Crane's future.

Vice Adm. Pete Nanos, commander, Naval Sea Systems Command, the Navy's largest acquisition organization, listed many unique qualities of the southern Indiana base.

"Crane has led the way in how we organize and manage warfare," Nanos said. "It has put pressure on our organization to be more efficient....When you look at Crane's unique skills, highly qualified workforce and its ability to innovate, the future of Crane looks pretty bright."

Crane Navy and Army employs hundreds of residents in Lawrence and surrounding counties.

Nanos was in Bloomington Tuesday for the American Society of Naval Engineers symposium at the Bloomington-Monroe County Convention Center. Before he appeared as a guest speaker, Nanos spoke with members of the media.

Nanos is responsible for the design, engineering, procurement, integration, construction, in-service support and maintenance of the Navy's ships, shipboard weapons and combat systems.

In light of discussions concerning base closures in 2005, Nanos said nothing is a sure thing but, "If Crane sold stock, I would buy stock in the company."

Nanos explained that when the government considers Base Realignment And Closures, decisions are based on economic analysis.

"Crane provides a good service at a low cost and takes away all economic reasons to be considered for BRAC," he said. "The direction Crane is going in is the right direction."

Nanos said it is premature to talk about BRAC, but he did say that military officials value Crane highly. He said Crane's work is noticed, illustrating his point by discussing a photo taken in Afghanistan of Special Forces officers.

"And in that picture, we counted a half-dozen Crane products in there," he said.

While Crane is a unique Naval organization, Nanos believes it isn't at high risk for acts of terrorism.

"We've been at war for a while," he said. "Facilities that are visible are at risk. There's not as great of risk here (at Crane) as many national monuments."

Nanos said ships overseas that are highly visible also are prime symbols and the ones Navy officials are most concerned about. He said security has been heightened everywhere, including Crane.

"We are much more careful as of how we treat our installations," Nanos said.

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The Proposed New Interstate 69 Highway: Is It A Cost-Effective Rural Economic Development Tool For Southwest Indiana?

Wim Wiewel
Joseph J. Persky
Mark Edward Sendzik

University of Illinois at Chicago

January 1999

Executive Summary

This study examines the cost-effectiveness of the Evansville-to-Bloomington portion of the proposed new Interstate 69 highway in Southwest Indiana in fulfilling its stated purpose of stimulating economic development in four rural counties -- Gibson, Pike, Daviess and Greene. To do so, we compare the proposed highway with other, more traditional rural economic development programs and strategies: rural enterprise zones, two federal government economic development programs, business incubators and local industrial development groups. As a basis for comparison, we use cost-per-job.

Using Indiana Department of Transportation ("DOT") cost and job-creation estimates, we first calculate the cost-per-job of using the proposed highway as an economic development tool for these counties. We then compare that figure with cost-per-job data that has been gathered for other rural economic development programs based on experience with those programs throughout the country.

We conclude that:

- The cost of each new job that the proposed new highway would create in the four rural target counties is $1.56 million.
- The other, more traditional rural economic development programs and strategies that we examine have created jobs elsewhere in the country at costs ranging from $437 to $28,350 per job. For most of these programs, such as rural enterprise zones, business incubators and U.S. Economic Development Administration public works projects, the average cost-per-job is between $1,000 and $5,000.
- Given that the cost-per-job for the proposed new I-69 highway is over 50 times higher than the cost of traditional rural economic development programs, the highway does not represent a cost-efficient economic development strategy for the four rural counties.

This study does not take a position on whether the proposed new highway should be built. Nor does it advocate any specific alternative or set of alternatives. However, if the purpose of the I-69 project is economic development in these rural counties, as the Indiana DOT has stated, far more cost-efficient alternatives almost certainly exist.

The authors of this study are specialists in economic development at the University of Illinois at Chicago. Wim Wiewel is Dean of the College of Urban Planning and Public Affairs. He has written extensively on economic development topics, and is Associate Editor of the Economic Development Quarterly. Joseph J. Persky is Professor of Economics. Mark Edward Sendzik is a Ph.D candidate specializing in public policy analysis. This study was paid for by Citizens for Appropriate Rural Roads and the Environmental Law and Policy Center of the Midwest.

Part 1

Cost-Per-Job For the Proposed New Interstate 69 Highway

The purpose of this study is to examine the cost-effectiveness of the proposed new Interstate 69 highway in accomplishing Indiana's stated goal of economic development in four rural counties in Southwest Indiana. To do so, we compare the highway with other, more traditional rural economic development programs and strategies. We use the well-recognized measuring-stick of cost-per-job. We calculate the estimated cost to the public of each job that the highway would create in the target rural counties, and compare it with what other rural economic development programs and strategies have cost, per job, based on experience elsewhere.

Cost-per-job is the best initial measure to employ when determining the return on public investments for economic development. Cost-per-job analysis represents a basic step in conducting an economic impact analysis. Projects which yield the fewest jobs per unit of investment are unlikely to meet a more rigorous evaluation standard.

In November 1998, the Indiana Department of Transportation ("DOT") announced that it is expanding the scope of the I-69 project, extending its northern terminus from Bloomington to Indianapolis. As yet, however, the Indiana DOT has announced no proposed route for the Bloomington-to-Indianapolis segment, has given no official cost estimates for it, and has not estimated the number of jobs it would create. For those reasons, this study is limited to the original proposed Evansville-to-Bloomington section of the project. In this study, the words "the highway" and "I-69" refer to the project as originally proposed, between Evansville and Bloomington.

The primary purpose of the proposed new Interstate 69 highway from Evansville to Bloomington, according to the Indiana DOT, is economic development in four rural counties along the route -- Gibson, Pike, Daviess and Greene. (Draft Environmental Impact Statement ("EIS"), March 1996, pp. 1-12; Curtis Wiley, "The time to move ahead on the I-69 extension," Indianapolis Star, October 10, 1997.) This study examines whether the proposed new highway would fulfill that goal in an economically cost-effective manner.

The Indiana DOT has never, to our knowledge, publicly issued any projections of the number of permanent jobs the highway would create in Gibson, Pike, Daviess and Greene Counties, although it has issued other projections. But the U.S. Environmental Protection Agency ("EPA"), a federal government agency, has calculated on the basis of Indiana DOT's other projections that the project would create about four jobs per year in each of the four counties. (Letter from Valdas Adamkus, EPA, to Arthur Fendrick, Federal Highway Administration, December 5, 1996.) EPA's estimate appears to be reasonable based on the projections that Indiana DOT has released publicly.[1]

[1] In its projections in the Draft EIS, Indiana DOT does not give job-creation estimates for the four target counties either separately or as a group. Rather, it breaks Southwest Indiana into five "regions" and

Indiana DOT's projections measure job-creation over a 30-year period. Thirty years is a long time period to employ, because benefits cannot be predicted that long into the future with any certainty. In the past, we have recommended using a seven-year period to measure benefits, but tolerated a range of five to ten years. The private sector utilizes a shorter time frame when measuring potential benefits. Using a shorter time frame would decrease the number of jobs created and increase the cost-per-job figure for the highway. However, using Indiana DOT's 30-year period, at four jobs per county per year the highway would create a total of 480 new jobs in the target counties.

Indiana DOT's current estimate of the highway's cost is $750 million. (Wiley, "The time to move ahead," October 1997) Highway opponents dispute this estimate, claiming it dramatically understates the true costs of the project. As we will see, for purposes of this study it is not essential to resolve this dispute. We will therefore simply use Indiana DOT's $750 million estimate.

Dividing the $750 million cost of the proposed highway by 480 jobs created in the target counties yields a cost-per-job of **$1.56 million**. This is a reasonable approximation since: (1) the overwhelming majority of the highway's costs will be in the four targeted counties, which include about 90 percent of the highway's length; (2) while Indiana DOT projects that the highway would create additional jobs outside the four target counties, they would be incidental to Indiana DOT's stated purpose for the project;[2] and (3) Indiana DOT's job-creation projections for the target counties may be overstated, since it is not clear whether they take into account jobs lost due to the highway's impacts on farms and businesses in the right-of-way.

The $1.56 million estimated cost for each job the Interstate 69 project would create in the rural target counties can be compared to the cost-per-job of other rural economic development programs and strategies that could serve as alternatives to the proposed highway as an economic development tool for the target counties. Granted, the $1.56 million figure is only a rough estimate, due to the limited data provided by Indiana DOT. However, such a comparison can yield useful insights in determining whether the highway

estimates the number of jobs the highway would create in these regions. Gibson County is included in Region 1, and Greene County is in Region 5 -- in each case, along with a number of other counties. Pike and Daviess are in Region 2, along with only one other county (Knox).

Given this presentation of the data by Indiana DOT, to calculate the number of jobs the highway would create in the four target counties the best one can do is to use Region 2 (which includes two of the four target counties) as a proxy for all four of them. Indiana DOT projects 344 new highway-induced jobs in the three counties of Region 2 over the 30-year study period in the Draft EIS. (Draft EIS, Table 40, p. 138.) That works out to 3.8 jobs/county/year.

[2] For the entire State of Indiana, Indiana DOT projects that the highway would create 4,415 new jobs over a 30-year period. That works out to an overall cost-per-job of about $170,000. Most of the jobs the highway would create would be located in and around Evansville and Bloomington -- both of which are outside the Indiana DOT's target counties. Indiana DOT acknowledges that neither Bloomington nor Evansville is suffering economically. (Draft EIS, Appendix A, p. 4-17)

is cost-efficient as an economic development project for these counties, and whether more cost-efficient alternatives likely exist.

Part 2

Cost-Per-Job Using Alternative Rural Economic Development Programs

In this section, we examine data on the cost of creating jobs in rural areas using more traditional rural economic development programs and strategies, which can then be compared to the cost-per-job of I-69. The following cost-per-job estimates are taken from studies conducted during the past 20 years on a variety of rural employment development programs. These studies provide valuable information about the costs of creating jobs in rural areas. The cost-per-job estimates for these programs vary widely, ranging from $437 to $28,350. For most of these programs, the average cost-per-job is between $1,000 and $5,000.

Caution must be exerted when interpreting these figures, because the studies that we have consulted employ different methodologies for selecting and evaluating data. In addition, the cost-per-job estimates have not been adjusted to reflect a common dollar value (that is, they are not all expressed in 1998 or 1999 dollars). Moreover, in some cases these figures represent only the cost of each job directly created by the program. The $1.56 million cost-per-job estimate for I-69 apparently includes jobs directly and indirectly created. (Jobs are indirectly created when they result from money circulating through the economy that was initially spent as a result of a project or program -- for example, when people hired as a result of a program spend their salaries.) Some of the cost-per-job figures for these economic development programs would be even lower if they, like the I-69 figure, took into account jobs indirectly created.

For these reasons, the cost-per-job estimates presented below should be considered as estimates rather than precise costs.

Rural Enterprise Zones

The 1993 study *Rural Enterprise Zones in Theory and Practice,* by Richard Reeder of the USDA Economic Research Service, analyzes the performance of rural enterprise zones (EZ's) across the country. State enterprise zone programs offer tax incentives and other nontaxed government assistance to encourage capital investment and job creation by new firms and expanding local businesses in designated economically-distressed areas. In addition to state government incentives, local governments often offer additional incentives, such as reduced development fees, improvements in local infrastructure and property tax abatements, to businesses locating in enterprise zones. Although enterprise zones (EZs) were designed originally as urban economic development tools, they are now found in both urban and rural areas in the United States.

According to Reeder, only tentative conclusions can be drawn from the limited research that has been conducted to date on rural enterprise zones. In general, it appears that enterprise zone programs have created employment opportunities in distressed areas at a reasonable cost. The available evidence suggests that rural EZ's have been as successful

in generating jobs as urban EZ's, equalling or even surpassing the cost-effectiveness of urban EZ's.

Reeder cites the following cost-per-job estimates from six studies of state rural enterprise zones:

> "Cost per total direct job ranged from $437 in Virginia to $5,613 in New Jersey. Cost per net direct job can be substantially higher than cost per total direct job, because net jobs are fewer. Thus in New Jersey, the cost per net direct job is $13,070, more than twice the cost per total direct job. In this case, net direct jobs were computed by netting out those jobs for which the EZ was not viewed to be a major factor. This netted out 68 percent of the reported jobs created by EZ firms." (Reeder, 1993; p. 19)

A study of an EZ in Evansville, Indiana, estimated total direct jobs as the difference between zone and region employment growth. The study used a shift-share analysis to net out jobs generated through regional and industrial growth trends rather than the EZ. The cost per total direct job was $3,135 and the cost per total net job generated by the EZ was $4,117. (Reeder, 1993)

It can be argued that the impact of enterprise zone programs should be assessed by considering the "multiplier effect," thus counting jobs indirectly as well as directly created. A study of Indiana enterprise zones examined 1068 firms located in EZs. (At present, Indiana has only urban, not rural, enterprise zones.) A multiplier was applied to total direct jobs reported, in order to estimate the total number of jobs created. The cost per direct job was $4,116, while the cost-per-job for direct and indirect jobs together was $1,036. (Reeder, 1993)

USDA Business and Industry Guaranteed Loan Program

The U.S. Department of Agriculture's (USDA) Business and Industry (B&I) Guaranteed Loan Program has two basic functions: (1) to generate and retain rural employment opportunities, and (2) to improve rural economies. The program supports rural businesses by guaranteeing up to 90 percent of a loan received from an authorized lender in a rural area. Most legally organized bodies are eligible to receive loan guarantees under B&I program guidelines. B&I guaranteed loans may be directed towards buildings and real estate, certain debt refinancing, equipment and working capital. (USDA web site)

The B&I Guaranteed Loan Program currently has an average cost of $28,350 in loan guarantees per job created. The actual economic cost of $28,350 in loan guarantees depends on the riskiness of the loan and other factors, but in any case is substantially less than $28,350. The actual out-of-pocket cost-per-job expense to the federal government was approximately $275 in 1997. (Cannon, 1998)

U.S. Economic Development Administration Public Works Projects

In 1997, the U.S. Economic Development Administration (EDA) analyzed the results of 205 EDA-funded public works projects (buildings, industrial parks, roads, water/sewer, marine/tourism), in both rural and urban areas, obtaining close-out payments in 1990. Of the 203 projects that had been completed, an average of 327 direct permanent jobs were created per million dollars of EDA investment. The median cost per direct permanent job created or retained was $3,058 in EDA funds. When all funding sources (applicant, local, state, and federal) are considered, the total cost per direct permanent job was $4,857. (Rutgers, 1997)

Business Incubators

A business incubator is a facility in which entrepreneurs can share space and business services. Such services are often offered at below-market rates, thereby enabling a firm to decrease its overhead expenses. By providing this supportive environment, the incubator helps new small businesses survive and leads to the creation of jobs and a healthier local economy. Business incubators are usually funded with a mix of public and private funds.

There are four main components underlying the incubator concept: (1) an internal support network including on-site business assistance at low or no cost, assistance obtaining financing and employee training and placement services, (2) a real estate component that reflects the need for flexible user space including below-market rents and flexible leases, (3) the availability of management consulting services and (4) other support services. A "graduation" policy requiring firms to leave after three to five years may also be part of the incubator arrangement. (Wiewel, 1987)

In a 1997 study, the National Business Incubation Association (NBIA) estimated that the cost per direct job created by business incubation programs throughout the United States was $1,109. (Molnar, 1997) The NBIA contacted business incubators located in rural and urban areas for the survey.

Local Industrial Development Groups

Local industrial development groups (LIDGs) are not-for-profit associations of public and private entities, which are organized to promote capital investment and economic development in municipalities and counties. (Bellingham, 1998; Humphrey and Erickson, 1993) LIDG boards are controlled by representatives from such professions as engineering, law and banking, who establish a working alliance with local government, retailers, planning associations and regional utilities.

LIDGs became more prevalent during the 1970s and 1980s as a response to two trends: industrial restructuring and cutbacks in government funding. The most important motivating factors underlying the growth of LIDGs have been job creation, improved capability to compete with other localities for economic development and the ability to

access state and federal economic development assistance. (Humphrey and Erickson, 1993)

LIDGs play a variety of roles beyond business recruiting, handling inquiries from prospective businesses and facilitating the site selection process. Some organizations limit additional activities to managing industrial revenue bonds, while others undertake more active functions such as labor force acquisition and training programs, operating industrial parks and business planning. (Erie, 1998; Humphrey and Erickson, 1993; Tri-City, 1998)

Craig R. Humphrey and Rodney A. Erickson contend that LIDGs are a cost-efficient method of job creation:

> "The median number of new jobs created through the expansion of existing firms, new start-ups, and plant relocations was just over thirty, mostly in manufacturing. Given that the annual operating cost of an LIDG was less than $40,000 in 1983, the direct cost of creating jobs at that time was relatively low. [Humphrey et al., 1988:11] Some of this cost is also socialized, in that an estimated 40% of the LIDGs received at least a quarter of their annual budget from governmental sources. [Ottensmeyer et al., 1987:574]" (Humphrey and Erickson, 1993, p. 113)

Thus, according to Humphrey and Erickson's data, the average cost-per-job created through LIDGs in 1983, based upon their operating budgets alone, was approximately $1,330.

Part 3

Conclusion: Cost-Effectiveness of I-69 as a Rural Economic Development Project

As noted, the cost-per-job estimates in the previous section were not calculated by researchers using the same methodologies. Consequently, these estimates should not be taken to be precise. Nor should our analysis be taken to be the result of a cost-benefit analysis examining various alternatives to the proposed new highway.

That having been said, there is a dramatic contrast between the proposed new highway and these more traditional rural economic development programs in terms of the amount of public investment required to generate economic development. In the case of the new highway, $1.56 million in public funds are required for each new job created in the rural target counties. None of the alternatives requires more than $30,000 in public investment for each new job created. For most of them, the cost per job is between $1,000 and $5,000.

In short, in fulfilling its stated goal of rural economic development in the target counties the proposed new highway is more than 50 times more expensive than traditional rural economic development programs. Put differently, assuming that these programs would cost about the same in Southwest Indiana as they have elsewhere, the new highway would be 50 times less economically efficient than these alternatives. For each new job that it would create in the four target counties, the I-69 highway would require spending 50 times more tax money than it would cost to create that job using one or more of these alternatives.[3]

Given that the $1.56 million cost-per-job for the proposed new I-69 highway is 50 times higher than the estimated cost-per-job using more traditional alternative rural economic development programs, we conclude that the highway does not represent a cost-effective rural development strategy for Gibson, Pike, Daviess and Greene Counties. It is not our purpose to take a position on whether the highway should be built, or to advocate specific alternatives to it. However, if the purpose of the project is economic development in these rural counties, as the Indiana DOT has stated, far more cost-efficient alternatives almost certainly exist.

[3] For the entire State of Indiana, including both rural and urban areas outside the four target counties, at a cost-per-job of $170,000 the I-69 highway would be more than five times as expensive as the rural economic development programs we have examined.

References

Adamkus, Valdas. U.S. Environmental Protection Agency. Letter to Arthur Fendrick, Federal Highway Administration. December 5, 1996.

Bellingham Whatcom Economic Development Council Web Site. www.bwedc.org\edc. 1998.

Carmon, Dwight. Director of Processing Division. Business and Industry Guaranteed Loan Program. U.S. Department of Agriculture. Telephone interview. 1998.

Erie County Industrial Development Authority Web Site. www.tcam.org\ecida.html. 1998.

Humphrey, Craig R. and Rodney A. Erickson. Industrial Development Groups, Local Dependence, and the Community Growth Machine, in *Economic Development Strategies for State and Local Governments*. Robert P. McGowan and Edward J. Ottensmeyer, eds. Chicago: Nelson-Hall Publishers. 1993.

Molnar, Lawrence A. *Business Incubation Works*. Athens, OH: National Business Incubation Association. 1997.

Reeder, Richard J. *Rural Enterprise Zones in Theory and Practice: An Assessment of Their Potential*. U.S. Department of Agriculture. Economic Research Service. Agriculture and Rural Economy Division. Washington, D.C.: U.S. Department of Agriculture. March, 1993.

Rutgers University, New Jersey Institute for Technology, Columbia University, Princeton University, National Assn. of Regional Councils, University of Cincinnati. *Public Works Program: Program Evaluation*. Final Report. Prepared for U.S. Commerce Department, Economic Development Administration, Office of Program Research and Evaluation. Economic Development Administration No. 99-06-07415. Washington, D.C.: Economic Development Administration. May, 1997.

Tri-City Industrial Development Council Web Site. www.owt.com\tridec. 1998.

U.S. Department of Agriculture Web Site. www.usda.gov. 1998.

U.S. Department of Transportation, Federal Highway Administration, and Indiana Department of Transportation. *Draft Environmental Impact Statement: Southwest Indiana Highway Corridor*. 1996.

Wiewel, Wim, Lynn McCormick, William Howard and Wendy Siegel. *Community Economic Development Strategies: A Manual For Local Action*. UIC Center for Urban Economic Development. Chicago: The University of Illinois at Chicago. 1987.

Wiley, Curtis. *The time to move ahead on the I-69 extension*. Indianapolis Star. October 10, 1997.

ATTACHMENT N

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October 22, 2002

Mr. Thomas Tokarski, President
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Re: Review of archaeological study for draft environmental impact statement on proposed I-69 extension, southwestern Indiana, prepared by Bernardin Lochmueller & Associates

Dear Mr. Tokarski:

Per your request, we are writing to provide our comments on the archaeological studies for the draft environmental impact statement (DEIS) on the proposed I-69 extension, southwestern Indiana, prepared by Bernardin Lochmueller & Associates. To begin, we wish to provide background information for our review.

1. We are professional archaeologists, who have worked at Indiana University for more than three decades. In our careers we have had four decades of experience producing archaeological studies for highway construction projects, environmental impact statements, and a host of other federal- or state-funded requirements for archaeological investigations. Our studies geographically include not only Indiana, but also Kentucky, Illinois, Ohio, and Wisconsin, and range topically from earliest prehistoric Native American to historic Euroamerican, African American, and Native American archaeological sites. The investigations we have directed include pre-planning studies, initial surveys, test excavations, and data recovery to mitigate impacts, as well as "rescue excavations" following accidental construction impacts.

2. With one exception, we will comment only on the DEIS study of archaeological impacts for the I-69 alternate routes in southwestern Indiana, not on impacts to standing historic structures and cemeteries. The exception is a historic complex of inter-related historic archaeological features and sites that comprise one of Monroe County's and Indiana's most significant historic industrial resources – the pre-Civil War Virginia Ironworks.

3. Regardless of any criticism we have of the archaeological impact study per se, we are not opposed to the construction of I-69 between Indianapolis and Evansville.

Purpose of Our Comments

Following the letter and spirit of the National Environmental Protection Act (NEPA) and Federal Highway Administration (FHWA) section 4(f) evaluation, we will employ our

professional expertise to evaluate whether (a) the data on archaeological resources, and (b) the various interpretations (about density and location of significant sites), as presented in the DEIS, are adequate for making informed choices, based on likely impacts to archaeological resources, among alternatives being considered for project construction. We will review the "Sec. 106 Compliance Plan," which was developed in consultation with the Indiana State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation, as presented in Appendix P, for compliance with the National Historic Preservation Act (NHPA). We will also consider Section 5.13 of the Tier 1 DEIS as it pertains to archaeological impacts, and Appendix M, which describes the "Archaeology Analysis."

We question whether this particular Tier 1 study provides sufficient data and analysis for informed consideration under federal law and regulations, because of the way the study was designed and carried out. We conclude that the data offered in the DEIS on the likely presence of archaeological resources are substantially incomplete and the interpretations/predictions developed from data manipulation to assess likely impacts on those resources are based on assumptions or notions that are scientifically unsupported and logically flawed.

1. Compliance plan questions

The key question is whether the "tiered" approach to assessment of environmental impacts can be consistent with NEPA if the initial tier of data collection and manipulation does not provide adequate information and analysis to assess impacts and make informed choices among the project alternatives.

A second question is whether Section 106 compliance under NHPA is sufficient for compliance with NEPA when a Tier 2 study will be used to identify impacted archaeological resources rather than the Tier 1 study. How can the consequences of construction in the alternatives be considered when alternatives are not studied at a level of detail sufficient to know or estimate impacts?

A third question concerns the logic of the methods used in this Tier 1 study – specifically the narrow width of the working alignments (sometimes called "footprint," [App. M, p. 14]) versus the much wider study corridors. For the archaeological impact study, the focus is on the narrow alignments. As such, the only impacts listed are those on previously recorded archaeological sites within the working alignments; see Table 1 (App. M, p. 23). A wider, corridor-wide assessment of impacts would have avoided many likely problems. What happens when the working alignment has to be moved (for example to avoid one of the historic cemeteries or fragile resources that are not plotted on the DEIS maps)? Will it be necessary to redo the DEIS for archaeology impacts whenever the alignment shifts? This seems to be a required course of action since doing otherwise would mean that the recorded archaeological resources in the "revised alignment" would be ignored in project decisions.

A fourth, related set of questions concerning impact study of the corridors vs. the alignments is that the Tier 1 Record of Decision (ROD) is to approve a single, selected corridor. "The Tier 1 ROD will not select a specific alignment within that corridor." (DEIS, p. 2) But the DEIS for archaeology addresses the "working alignments" (App. M) rather than the wider

corridors, indicating that there are already-selected alignments within the corridors. Thus, the archaeology impact study indicates that alignments have already been chosen prior to the DEIS. Further, why are the potentially impacted recorded historic sites enumerated for the width of the corridors, but the likely impacted archaeological sites are tabulated only for the working alignments, when NHPA and Sec. 106 applies to both historic and archaeological sites?

Finally, related to a programmatic agreement on mitigation of impacts to historic and archaeological resources "at the conclusion of Tier 1" (DEIS, p. 2), how is mitigation of archaeological impacts to be designed if the impacted resources are not identified and evaluated until Tier 2? (Can mitigation be planned when you don't even know the resources being impacted?) How can potential impacts to National Register-eligible properties (FHWA 4[f])) be properly considered after the Record of Decision, if the surveys are not done and the site not even identified or evaluated until after that decision? Will consulting parties who have participated under Section 106 be able to participate in the development of programmatic agreements? Will additional consulting parties be able to participate?

Answers to these legal and procedural questions are very important, and hopefully may be found in environmental or historic preservation case law and best practices in neighboring states. We wish to focus in parts 2 and 3 of our comment on archaeological impacts as presented in the DEIS and as they are required to be studied by multiple federal laws. Since we are archaeologists, not lawyers, we can only raise legal and procedural questions, not answer them.

2. Archaeological Data.

A. Data presented, and the nature of the data. The archaeological site data resulting from a records/literature review for the five 2-mile wide study bands or corridors and 12 alignments being considered is presented as a list of site reference numbers and site cultural periods for the working alignments (Appendix M). This list is abstracted from a larger list of recorded archaeological sites in the corridors that is not presented but which numbers 2,088 prehistoric and historic archaeological sites (App. M, p. 14). The reported archaeological site information was derived from archaeological surveys made prior to the DEIS but not for the DEIS. Probably less than 10 per cent of the land in the various corridors, or for that matter the alternate working alignments, has been surveyed for archaeological resources by discovery methods that meet modern standards. Many of the previous studies reporting sites in these areas are of uneven quality, and data were not reported in a manner that could be used to evaluate resource impacts or to assess archaeological significance or National Register eligibility. Consequently, the lists provided in the DEIS present neither (i) a complete inventory of archaeological resources in the alternate alignments, nor (ii) a data set compiled as a systematic sample of the areas in the routes that could be used for comparing the likely archaeological impacts in the project's alternate routes. In brief, data collection for the archaeological impact study in the DEIS is opportunistic rather than scientific. Scientifically based survey samples are routinely used in archaeological impact studies to choose among alternate construction areas.

B. Data missing? Part I. In the 1990s, Bernardin Lochmueller & Associates ("BLA") carried out, with their archaeological consultants, field surveys of portions of the project's alternative routes to discover archaeological sites. This information was conveyed at a public meeting in May 1996 about the project at Tri North Middle School in Bloomington by Mr. Thomas Beard, of Landmark Archaeological Consultants, employed by BLA. Information from

those surveys has not been included in the DEIS. Why not?

Further, we have been told that the report of investigations from those surveys was withdrawn from the historic preservation review process at the State Historic Preservation Office after that report was submitted for review. We do not know who withdrew the report. But why was the report withdrawn, and why was the survey data not included in the DEIS?

C. Data missing or excluded. Part 2. Unrelated to the DEIS, we have carried our professional work in several small portions of one working alignment, and so had unique expertise to assess how the DEIS studied the likely impacts to previously recorded archaeological resources in this limited area. Over a distance of three miles, four previously recorded archaeological sites are located in the Alternate 3 working alignment and were omitted from the DEIS! Our surveys covered only a small part of the alignment in this 3-mile stretch, so this is a particularly shocking number. Moreover, the sites were recorded more than 20 years ago. How many other parts of Alternate 3 have excluded data? Which other alignments have excluded data? Is 4 archeological sites per 3 linear miles an average figure for the data that was excluded from study? What types of archaeological sites were excluded from consideration?

Three of the missing sites in the area we studied are prehistoric (12-MO-584, 12-MO-588, and 12-GR-744). 12-MO-588 is little known. However, 12-MO-584 is identified as PaleoIndian, and 12-GR-744 is known to have multiple Archaic and Woodland components and densities of material that indicate a high probability of archaeological features still present below the plow zone. Neither of the sites is located in a floodplain. Both 12-MO-584 and 12-GR-744 would require intensive archaeological survey and test excavations to evaluate their National Register status.

The fourth site in the alignment that was missed by the DEIS is 12-MO-158, the furnace structure at a complex known as the Virginia Ironworks. It is located in Alternate 3A-B-C, southwest of Bloomington. The ironworks operated from about 1839-1844. The furnace structure has long been recorded by geologists and archaeologists, but our surveys in 2001-2002 revealed multiple related features and sites. Thus, the Virginia Ironworks is the focal point of a larger complex of historic archaeological features that relate to Monroe County's earliest manufacturing industry. In addition to the furnace itself, the complex includes iron mines, limestone quarries, ore and charcoal processing and stockpiling features, structure foundations, house sites (the original Freeland homestead, and then the Adams homestead), former roads, a cemetery (the Adams Cemetery), a house foundation, and in particular extensive sealed archaeological deposits associated with the people who worked at the iron furnace. Many of these archaeological and historic features and structures are also in the alignment, but none are shown on DEIS maps, even though the cemetery and the Freeland-Adams house site had been previously recorded. An existing, occupied structure at the Freeland-Adams house site is shown on the DEIS map, but this is not reported in the DEIS to be a historic structure. That structure, recorded as Indian Creek Township 009 in the published Interim Monroe County Survey of Historic Sites, was built ca. 1880 after the Freeland-Adams house was destroyed by fire. The Virginia Ironworks complex (VIW) is being proposed as a historic district. Its National Register status, when determined, should reference regional significance for this example of pre-Civil War iron industry. However, as the only surviving early iron furnace in Indiana, the "VIW" historic district can also be considered to have state-wide significance.

In short, the data presented fall far short of informing about the likely presence of archaeological resources in the alternate routes, and some data appear to have been excluded from the study. The excluded or missing data, of course, has considerable bearing on data manipulations, or interpretations made to assess likely archaeological impacts.

3.I nterpretations of data.

To compare likely impacts among the project alternatives, the DEIS uses (A) predictions about archaeological site densities and (B) modeling or predictions of locations of likely National Register quality sites.

A. Predicted Archaeological Site Densities. One of the DEIS's manipulations or interpretations of the archaeological data is projection (or prediction) of archaeological site density, using the estimated acreage required for construction of the various alternative routes. The density figure employed is one site for every six acres. The DEIS cites a study by Gary Ellis and others (1989), which refers to a reconnaissance survey in Greene County, for this particular density figure. The DEIS claims this figure to be "a site density predictive model for southwestern Indiana" (App. M, p. 24), but the cited study does not ascribe such lofty status to the particular figure of 1 site per 6 acres. Given the environmental variability in Greene County, let alone other parts of southwestern Indiana, archaeologists who have worked in the region know well that site density varies greatly with respect to the diverse environmental features present. Further, reports indicating variable archaeological site density in the southwestern Indiana region were cited in the DEIS, and others are on file at the Indiana Division of Historic Preservation and Archaeology and were available to the authors of the DEIS.

The use of a single density measure to compare the likely impacts to archaeological resources of the various alternatives, which contain not only diverse environmental features but also features not present in Greene County, is scientifically, statistically, and logically indefensible. Therefore, the projections in Table 5.13-3 in the DEIS on the estimated density and archaeological sites that would be affected in the various alternate routes are meaningless numbers. These cannot be used to draw any conclusions or make decisions about likely archaeological impacts among the alternate routes because the numbers are not "information."

B. Prediction of Areas Where National Register of Historic Places (NRHP) Eligible Sites are Likely. The DEIS notes that archaeological resources have been destroyed or severely compromised by plowing, erosion, and modern constructions, but that floodplains of rivers and streams contain stratified prehistoric and historic archaeological resources. The DEIS claims (p. 26), "It is in the floodplains that much of our remaining undiscovered records of the past are to be found."

As archaeologists who have investigated a number of deeply buried archaeological sites in floodplains, and long argued for subsurface surveys, coring, and geoarchaeological expertise to discover such sites, we find that statement unsupportable. In fact, "much" of our archaeological heritage is represented in mounds, cemeteries, earthworks, villages, farmsteads, and rockshelters, which are not in floodplains. While such sites are not covered by flood deposited sediments and often are shallow, a high proportion of these sites have intact cultural deposits that extend below the reach of the plow (e.g., structural features, storage facilities, refuse disposal areas, burial pits, etc.) or have not been affected by plowing and other recent

land-alternations. Such sites make up a high percentage of the NHRP-eligible archaeological sites in Indiana and throughout the Midwestern U.S., and some number of them can be expected to be present in the alternative routes. In fact, we have been involved in the excavation of more than 41 such sites in Indiana, and 34 others in Ohio, Kentucky, Illinois, and Wisconsin. On the other hand, systematic archaeological survey of extensive outcrops of floodplain sediments in the Wabash and White River valleys, as well as others, have indicated that sites are far less common in these floodplain locales than they are in exposed outcrops of Ohio Valley floodplains. It would be gross error to focus archaeological evaluation strategies, or surveys and preservation planning, on the floodplains alone, since that would produce a highly skewed representation of the 12,000-year history of human experience in Indiana and our cultural heritage.

The DEIS promotes its "newly created GIS" for the I-69 project, but doesn't ever use the power of the GIS data set in the archaeological analysis. To be fair, the DEIS says (App. M, p. 27) "The computerization of archaeological information combined with environmental geographical data and modeling software provides endless possibilities that have *only begun* (emphasis added) to be explored." But decisions on the highway are due in about three months, and information about archaeological impacts is needed before these decisions are made. Why is "exploration" only beginning at the time the DEIS is being released, and not before?

Further, we are not told in the DEIS what attributes of archaeological sites would make them NRHP-eligible, nor what procedures or studies were used to select the variables used in making predictions about their location patterns. Nor are we given the statistics to judge how predictions were evaluated and what levels of statistical confidence were achieved. We can only guess where the attributes and variables came from. Are these from systematic analysis of records of NHRP-eligible sites or from the hunches, ideas, or collective experience of archaeological experts? Or are they from archaeologists who – reportedly – stuck pins in maps based solely on their intuitions about archaeological/environmental correlations?

Moreover, the so-called modeling in the DEIS uses opportunistic archaeological survey data rather than scientific survey data, as we noted above in our section 1. Regardless of the type of GIS manipulation or the (unknown) statistical procedures employed, the type of archaeological data utilized is not appropriate for correlating archeological and environmental variables or predicting likely impacts. Further, no predictive modeling statistics are offered in the DEIS to inform about correlation of archaeological and environmental variables or probability of impacts. Even if a computerized archaeological database, a GIS, a set of maps, and a series of statements is claimed to be a modeling tool, it is not necessarily a model – nor can it be reliably used as such in making decisions – if the steps used in developing the "model" are not scientifically sound. Nothing in the DEIS would support a conclusion that the supposed model is sound.

Predictive modeling is not a new science – not even in archaeology – but it is a science. When applied to a particular problem – such as choosing among alternative construction plans – the assumptions about data, analytical and statistical methods, and all the results must be described in order for the model to be evaluated. In the DEIS this was not done. Very clearly, the DEIS presents neither a model nor anything like a predictive statement that can be substantiated in any way.

So, where does the DEIS predict archaeological sites of NRHP eligibility to be located? It's hard to say, because the DEIS is silent. The DEIS presents a map showing "a simple correlation ... presented with our newly created GIS modeling toolkit to illustrate graphically where the high probability of National Register of Historic Places Eligible sites are most likely to be found (Figure 2)" (App. M, p. 28). What is being correlated? Correlation implies two or more variables. What variables? Correlation is also a statistical statement. Where are the statistics that inform us about the basis for the prediction, and the confidence that we can have in such prediction?

Maybe the dark-shaded "predicted areas of potentially eligible archaeological sites" are where the alternate routes cross floodplains, but a simple glance at other maps shows this is not the case for all dark areas. Why is there a large section of "dark shading" along Alternate 1, from Vincennes to the White River? This long tract is certainly not a floodplain, but we have no hint why this large area was singled out. Will this supposed concentration of so-called "predicted areas of potentially eligible archaeological sites" make Alternate 1 a less viable construction alternative? Maps like those in Figure 2 cannot provide sufficient information for any level of decision-making about project alternatives with respect to archaeological impacts because the DEIS and its appendices do not allow the conclusion that they were developed from proper assumptions and methods. Therefore, any decisions based on this type of approach to considering archaeological resource impacts can be challenged as uninformed and scientifically unsound.

Last but not least, the DEIS claims (App. M, p.27), "Although not presented here in this public document to protect specific local cultural resources, the model can easily be zoomed in ... to refine our area of high probability to specific soil types or characteristics.., slope, aspect, or distance to water." But it is not necessary to compromise protection of archaeological resources in order to present the data used in developing and testing a model that predicts the locations of NRHP-eligible archaeological sites, so the claim of "protection" is not an excuse for failing to describe the essential elements of a predictive model. A map of properly developed and tested correlations would not have to be any more specific than what is illustrated in Figure 2 for the public to be able to evaluate the study of archaeological impacts.

To summarize, the DEIS's data interpretations of archaeological site densities are unsupportable, and its so-called "predicted areas of potentially eligible archaeological sites" are not scientifically valid predictive statements. Regardless of having a GIS for the DEIS, and something characterized as a modeling tool, what is presented is not a model of anything.

Because the DEIS missed or excluded previously-recorded archaeological site data, including archaeological survey data generated in the 1990s for I-69 alternate routes, and inappropriately used site density estimates and modeling of likely site locations, the impact study is seriously flawed and not usable as a basis for decisions. The clearest example of the failure of the approach used in the DEIS is in a small portion of Alternate 3, where we have first hand information for the working alignment. But in this limited area, neither the listings of previously recorded sites or modeling tell us about likely impacts to the historically important pre-Civil War Virginia Ironworks complex – even though the furnace structure, a historic house, and a historic cemetery were all previously recorded. For all the alternate routes, we can have no confidence that the DEIS reliably or adequately informs us about the likely presence and types of

archaeological impacts for the alternate routes, but we can be certain that the data that were misused for predictions and so-called modeling of likely impacts to archeological resources.

We believe the Indiana Department of Transportation, the Indiana SHPO and Division of Historic Preservation and Archaeology, and the taxpayers of Indiana were poorly served by the archaeological study that BLA and its consultants have carried out for the I-69 extension project. Across the country, high-quality archaeological studies have been submitted to SHPO offices and are being done in advance of highway construction under NEPA and NHPA and in accordance with established FHWA requirements and practices. The I-69 extension project and the people of Indiana deserve nothing less, especially given the high level of interest in archaeology and historic preservation in this state. It is a sad note indeed that – after so many years of study for the I-69 extension project – there is truly nothing in this DEIS of either substance or sound practice to inform decision-makers and the public about the types, amounts, and locations of archaeological impacts in the alternate routes. How, then, can the people who will select the alternate for construction take into account archaeological impacts and minimize harm to these heritage resources?

Sincerely,

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Cheryl Ann Munson
(Assistant Scientist, Department of Anthropology, Indiana University)

cc: Advisory Council on Historic Preservation
Indiana State Historic Preservation Officer
Historic Landmarks Foundation of Indiana
Monroe County Commissioners
Monroe County Council
Monroe County Historic Preservation Board
Monroe County Historical Society

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Citizens for Appropriate Rural Roads (CARR) hereby submits our comments of the draft environmental impact statement (DEIS) for the I-69 Evansville to Indianapolis highway project issued by the Indiana Department of Transportation (INDOT) on 31 July 2002.

In addition, we ask that our previous comments: "Comments of Citizens for Appropriate Rural Roads on the Draft Environmental Impact Statement for the Southwest Indiana Highway Corridor, July 1996 (Attachment A), and our comments on the draft Purpose and Need for this project: The Untold Story (Attachment B) also be included as comments on this DEIS. We have also submitted additional comments under separate cover in conjunction with The Environmental Law and Policy Center, the Hoosier Environmental Council, and Citizens Action Coalition of Indiana.

GENERAL CONCLUSIONS

We find that this DEIS fails on several grounds to show a valid purpose and need for the proposed highway project. Furthermore, an unbiased presentation of the conclusions of INDOT's own results would show no significant difference among all of the alternatives in satisfying the DEIS's performance measures, including the No Build alternative.

Significant amounts of information needed to adequately review and analyze this DEIS have been denied to the public. Until this missing information is supplied, and the comment period extended to allow adequate time to study it, this DEIS must not go forward.

The Tiering process is misused in this DEIS. Enough information must be supplied in Tier 1 to avoid "pointing a loaded gun" at an alternative that would prove unacceptable, for environmental or other reasons, in Tier 2. This DEIS frustrates a valid comparison of these alternatives due to incomplete and missing information on the environmental, social and economic impacts among the various alternatives

For these, as well as other reasons detailed in the following comments, we ask that this DEIS be withdrawn in order to correct errors.

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GENERAL COMMENTS

Scaling the performance measure scores does not reduce confusion and simplify the analysis, as suggested in Appendix A, page A 1. It does just the opposite. It makes small differences appear large and leads to a misunderstanding of the actual variations among the alternatives. Public presentations using scaled values and rankings are used as a deceptive tool to promote INDOT's "preferred" alternatives. This is a misrepresentation of the actual results of the studies. This problem is magnified when abstract, indirect measures are scaled. For example, most viewers of the presentation on "accessibility" will have no idea what the numbers and graphs actually measure since they are based on modeling data they have no access to. But they will be led to believe that there are vast differences among some of the alternatives when in fact there is little difference. This results in a graph appearing to show little overall impacts due to I-69 on these resources. Interestingly, data for farmland, forest, and wetland losses is not similarly scaled. If the graphs for the performance measures had been set up this way they would have shown little difference among the alternatives (See our comments sent in under separate cover with The Environmental Law and Policy Center, et. al.)

The No Build Alternative is not properly studied in this DEIS. In essence, it was dismissed as an alternative. For example, Table A-16 in Appendix A, shows a zero for the No Build Alternative on "All Personal Accessibility Measures". What does this mean? Is there not a current level of accessibility for the existing transportation system? Would that continue even if the I-69 extension were not built? Will not other planned transportation projects affect accessibility? In many other areas of this DEIS the No Build Alternative is dismissed without justification. NEPA requires a rigorous and complete analysis of the No Build Option. This DEIS fails to fulfill that requirement.

The only solution to the economic and transportation conditions set out in the DEIS is an interstate highway, thus eliminating all other transportation, and non-highway alternatives that would be more fiscally, socially and environmentally responsible. Such alternatives have been shown to be a much more efficient use of public funds. Improving and upgrading the existing highway network, as well as an analysis of non highway options must be addressed in a supplemental DEIS. 3.2.1

The Study Area for this DEIS is too large. It includes counties that none of the proposed routes would traverse or be affected by. It also selectively omits data from the Indianapolis MPO counties when they do not support the predetermined picture of the Study Area that INDOT wishes to present to the public. This overly large area is covered in order to allow INDOT to pick and choose demographic data that suits its desire to show the need for another interstate highway in Southern Indiana.

There is a systematic bias against the US-41/I-70 option in this study. For

example, on page 3-15, under "Route Performance and Cost" is the statement: "Like the No Build Alternative, the major strength of Alternative A was its relatively low cost." (Note: Alternative A corresponds to Alternative 1.) Besides being prejudicial, this is in fact untrue, as a correct interpretation of INDOT's own data shows. None of the alternatives show large increases over the No Build in performance measures. Cost and environmental impacts are the major differences among the options and on these measures Alternatives A and the No Build score the highest.

The DEIS selectively assigns "committed" projects to the No Build Alternative. The widening of I-70 and the construction of the 641 bypass around Terre Haute are "committed" and assigned to the No Build Alternative but "committed" projects on SR-37 are not assigned to the No Build Alternative. All of these projects are in INDOT's Long Range Plan. The result of this inconsistency is to diminish the performance of the US-41/I-70 option but not the performance of the routes using SR-37. This unfair manipulation of the study must be corrected.

The public outreach program for this project, much flaunted by INDOT, was little more than a public relations campaign designed to sell the project to a skeptical citizenry. Its newsletter was strongly supportive of the project and its preferred alternatives. Only token representation of the opposition was presented. INDOT presentations at public meetings and hearings were little more than PR events. Meanwhile, overwhelming opposition to the entire project or support of Alternative 1 were publicly dismissed by Commissioner Nicol as irrelevant. INDOT's Issue Involvement Team (IIT) was also a PR ploy. It was intended not so much to involve citizens in the process as to allow INDOT to falsely claim the public was involved. In reality, the IIT played a meager role in the process and its influence was negligible. For these reasons, our organization, as well as others, withdrew after a few frustrating meetings. We felt we were being used to promote a project that we strongly opposed.

The DEIS information on INDOT's website was not accessible to many people. We received many complaints that files could be downloaded but not opened, and it could take hours trying to download maps. We were never able to open many DEIS files. 11.3

INDOT's prohibition of signs in meeting rooms is discriminatory and possibly illegal. Such behavior is allowed under the First Amendment to the U.S.Constitution. INDOT's intention is to stifle dissent and control all aspects of the public hearings in contempt of the democratic process. 11.3

Chapter 2-PURPOSE AND NEED

General Comments

This Purpose and Need Statement (P&N) has several underlying goals:

1) It attempts to show, by highly selective use of data, that SW Indiana is economically depressed due to a lack of transportation facilities.

2) It then presents as the only solution to these contrived needs, a Canada to Mexico NAFTA interstate highway (Corridor 18).

3) It attempts to present all of its "preferred" alternatives as similar in their ability to satisfy the performance measures for the project, thereby allowing INDOT to chose whichever route it wants based on political considerations.

4) It systematically, by rigging the analysis, sets out to eliminate Alternative 1 as a reasonable option.

5) By the use of statistical manipulation it exaggerates the presumptive benefits of a new highway.

In addition, this P&N statement has many other problems.

It does not compare counties on interstates with counties not on interstates. Such an analysis would likely show that interstates are not predictive of success in the measures studied. 2.3.2

It shackles Alternative 1 by not including full benefits of the 641 bypass around Terre Haute and an upgraded I-70.

It selectively includes or excludes counties in the Indianapolis MSA depending on how it wants to skew the data.

Corridor 18

Although Congress has designated Corridor 18 (Corr 18), a proposed interstate connecting Canada and Mexico, as a "high priority corridor", it has also stated that no state is required to complete its portion of this project (2-1). There are numerous Canada-Mexico interstate routes currently in use and NAFTA trade is ongoing and not hampered by the lack of another interstate highway. Furthermore, the relevance and need of Corr 18 for Indiana has not been shown.

Nor does the DEIS explain the need for Corr 18 other than to say it has been

designated as a goal of Congress. The goals given for Corr 18 (p. 2-5) are purposes, not needs. One could present purposes for many projects without showing an actual need for them.

The main purpose of providing an improved link between Evansville and Indianapolis which strengthens the transportation network and supports economic development in SW Indiana (p.2-1) can be achieved without Corr 18.

It is important to remember as the dEIS notes that Indiana is not required to complete I-69 (Corr 18) through the State. INDOT's decision to include the I-69 extension from Indianapolis to Evansville as a core goal is therefore arbitrary. 2.3

Since INDOT has utterly failed to show a compelling need for I-69 through Indiana, this goal should be removed from the DEIS.

The main performance measure supporting the Corr 18 core goal is truck Vehicle Hours Saved (VHS). Minutes from an MPO meeting, Nov. 2001, Appendix Y, page 8, states that the truck VHS will be greatest for alternatives using SR-37, and that this is due mainly to diversion of traffic from I-65 south of Indianapolis. Comments from this same meeting also state that this diversion is "...only tangentially related to the objectives of this study." Yet the DEIS bases its ratings of the alternatives for the Corr 18 goal on this measure. 3,4,5

Since there are only slight improvements in truck VHS for any of the alternatives, and this measure is only a tangential result of this project, the entire performance justification for the Corr 18 goal is unfounded.

Nor does the completion of Corridor 18 require an all new interstate. Indeed, the February 2000 Corridor 18 Purpose and Need Document defined "overall goals" for I-69. Goal 6 states: "To upgrade existing facilities to be utilized as I-69 within the corridor to design standards suitable for an interstate highway and commensurate with projected demand" (p. 2-8).

The state of Kentucky has decided to upgrade its existing parkway system to accommodate I-69. (See: Evansville Courier & Press Western Kentucky Bureau 25 Feb. 02 and Indianapolis Star, 4 March 02). It is important to note that Alternative 1 could be upgraded to satisfy Corr 18 at far less cost and fewer environmental impacts than any of INDOT's "preferred" alternatives.

It should be noted that labor costs overwhelmingly outrank infrastructure when it comes to location choices made by multi-national corporations. The Toyota truck manufacturing plant in Gibson County did not locate in southern Indiana due to its proximity to I-64 any more than RCA relocated to Mexico because of its good limited access truck highways. Toyota came here because labor and land are cheaper here than they are in Japan and because they were given huge economic 2.3.2

incentives by the state. 2.3.2

It should also be noted that many manufacturing companies are now leaving Mexico because even cheaper labor costs can be found in Asia (AP, 29 Oct. 02). The current and future needs of another Canada to Mexico highway based on changing economic conditions should be studied before large sums of money and resources are put into a project that may be unneeded

Figures 2-3 and 2-5 show a new terrain route for the proposed I-69. Figure 2-5 even shows a connection with US-231. This indicates an inherent bias for a new terrain route for I-69. 2.2.2

According to Figure 2-4, SW Indiana has few areas designated as "Economic Centers for Transportation Planning." Of these Vanderburgh and Dubois are already linked by I-64 and Vanderburgh and Vigo counties are linked by US41. A north-south link will be achieved by completing the planned upgrade to US-231 from I-64 to I-70. Choosing US-41/I-70 for the I-69 extension, along with some improvements to SR-37, would fulfill the goals of INDOT's Highway System Policy. This would also fulfill INDOT's stated desire to select investments that "offer the best value" and to protect the environment.

Although INDOT attempts to show a lack of connectivity between Indianapolis and Evansville, it also admits there is no standard by which to judge how much connectivity is needed: " There are no recognized transportation industry standards suggesting by how much this connection should be improved" (p 2-13) Therefore, it cannot be assumed that an interstate highway is necessary to improve access between Indianapolis and Evansville. Furthermore, INDOT's discarding of non highway alternatives is based on a desire to complete Corr 18, which it is not required to build.

Another advantage of using the US-41 corridor would be reduced travel time from SW Indiana to NW Indiana. Improved access to the Gary-Hammond area and Chicago, as well as improved access to Indianapolis magnifies the benefits of Alternative 1. This advantage should have been addressed in this DEIS. 2.3.1

Travel Time and Distance

INDOT did not choose the shortest route between Indianapolis and Evansville for its no-build alternative. That would have been SR57 to SR231 and SR 67 to Indianapolis. Instead it chose US41/I-70 as the no-build alternative to compare the other alternatives to. Using the SR57/231/67 would have demonstrated a better existing route and less time and distance savings by the new routes. INDOT should use this shorter route as the No build alternative for its analysis. ((Note: footnote 8, on page 2-12, is confusing. It reads: "Due to the planned construction of new projects (e.g., SR 641 - Terre Haute bypass) some of the shortest time paths will 2.3.1

change in the future." Was the SR 641 bypass included in the No Build calculations, as stated elsewhere, page 3-21, or not?

The methodology used to rate cities on access to Indianapolis is arbitrary and misleading. Its sole purpose is to make the access between Evansville and Indianapolis appear poor. Contrived data such as this serves to discredit the entire analysis. 2.3.1

It appears that the time savings benefits to trucking were not properly analyzed and may have been inflated. Truck hour benefits should be discounted at approximately 7% over 25 years. If there is no congestion, as in this case, then time savings benefits to businesses are insignificant, pennies per load on a trip from Indianapolis to Evansville. Reliability is more important than time savings for businesses. Also, time saved for businesses means lost wages to drivers; thus, this is not a societal benefit. A risk factor should also be included in the analysis, usually by adding to the discount rate. 2.3.1

Accessibility

Methods used to determine accessibility appear arbitrary and are not predictive. For example, for all of the measures shown on the maps (Figs: 2-12,2-13,2-14,2-15,2-16,2-17) the existence of an interstate highway does not show improvements to the measures studied. Evansville has interstate connections to Louisville, Kentucky and St. Louis, Missouri yet the maps show low accessibility in the regions served by these interstates. 2.3.1

In Figure 2-17, NE Indiana with I-69 running through it, is no more accessible to Indianapolis than SW Indiana.

(Note: Accessibility Index charts, Figure 2-17, showing high to low levels are incorrect; the high and low colors are reversed.) 2.3.1

Congestion

Excluding the counties in the Indianapolis Metropolitan Statistical Area (MSA) from this analysis ignores existing problems and dodges the impacts a new I-69 will have on traffic in this area, especially on I-465. 2.3.1

Outside of the Indianapolis MSA, there is no overall congestion problem in the Study Area, Table 2.4 and 2.3. These tables also show that congestion is not predicted to be a serious overall problem in the study area in the foreseeable future. Local congestion problems can be solved without I-69.
There is inadequate data showing what congestion problems will be created with the proposed I-69 extension. Further analyses should be done, especially for I-465 and I-70 as well as for the Evansville area. 5.8

INDOT has already stated that it is only studying a new interstate for this project, therefore improvements to the transportation system other than simply building another major highway were not studied. Such improvements would have a greater impact on congestion management at far less cost and far fewer impacts on the environment.

Safety

Safety data did not show actual numbers but only rates and general statements. This has led to erroneous conclusions about the actual safety problems in SW Indiana.

Crash rates in urban areas with lots of traffic have consistently higher accident fatalities and injuries. The correlation between traffic volume and numbers of accidents is ignored by INDOT. Rates can be very misleading. e.g. Table 2-5 does not explain the high accident rate on Marion County interstates. Data in Table 2-5 is over 10 years old. Are these numbers still accurate?

It cannot be assumed, as this study appears to do, that building another interstate highway through the area will result in fewer accidents. This assumption must be carefully documented. For example, what will be the impact on safety and travel efficiency of building another interstate through already congested, unsafe areas, such as around Indianapolis? Also, before and after data is available for areas that had interstates built through them. That data should be included in this study.

Numerous road closings will necessitate more travel on local roads that INDOT already considers unsafe. How will this change accident rates? | 3.4.3

INDOT's safety analysis apparently does not account for induced travel. Increasing Vehicle Miles Traveled (VMT) will increase the number of accidents, even though the rates may not change.
Appendix A, p. A26, Table A 24 predicts only light reduction in fatalities over 20 plus years. It is clear why safety is not a core goal—INDOT cannot show significant improvements in safety attributable to the construction of I-69. Unfortunately, this table does not show what area of the state these numbers refer to.

Besides these comments, we refer INDOT to our previous comments on the subject of safety in our Purpose and Need analysis (The Untold Story, Sept. 2001). | 2.3.2

Economic Conditions

INDOT's continued reliance on an inappropriate USDA study indicates a lack of data to support its claim that SW Indiana is economically depressed.

Many economically stressed counties in the state are already on interstate highways. Proposing another interstate highway to help the economies of rural counties is little more than a shot in the dark. Nearness to an interstate highway is not predictive of overall economic well being.

Population Growth

As shown in Figure 2-22, the study area is growing at about the same rate as Indiana as a whole. Lack of an interstate has not kept the population of SW Indiana from growing.

Employment Trends

Figure 2-23 is incorrectly labeled and does not correspond to the accompanying text. Employment in the Study Area grew at a slightly higher annual rate (1974-2000) than Indiana as a whole. Also employment in the 20 most rapidly growing industries is the same in the Study Area as in the State as a whole. Table 2-6 lists six counties in the Study Area with high unemployment; it does not mention the other 20 counties. INDOT also eliminates the Indianapolis MSA from the analysis. Its inclusion would have yielded a very different picture of the Study Area.

Personal Income

Use of the "Effective Buying Income" category is arbitrary and suspect. This is not a valid or widely recognized measurement tool.

Increasing accessibility to urban areas through rural areas may drive down wages. A larger labor pool tends to reduce wages.

Poverty

Note that in Table 2-8, "Poverty Rates In Selected Study Area Counties", six of the twelve counties are on or very near an existing interstate highway.

The Study Area has relatively low actual numbers of people in poverty, even though the rates may be high for some counties. This is because largely rural counties have less population. Marion County alone has more people in poverty than the rest of the Study Area combined. Marion County also has lots of interstates. Also, counties along existing I-69 have high numbers of people in poverty.

General Principles.

The explanation on page 2-30 of how transportation and businesses interrelate is laughably simplistic. In fact, transportation costs are a small fraction of the cost of doing business.

The International Economic Development Council(IEDC) was hired because it could be relied upon to back up INDOT's claims Their analysis is not objective. Despite that, they didn't advocate for this highway or any interstate. It concludes that four-lane highways are important for economic development, not necessarily interstates. The IEDC was also scheduled to do a study on the cost of the I-69 extension but that study was never done. Why?

Crane

On anecdotal evidence Crane NSWF has been injected into the study as an important factor with little justification. This facility has survived many rounds of base closings and is not, by any measures, in danger of closing. Crane does not need I-69, I-69 needs Crane to try to justify itself. Crane was included in this study because the economic development groups in Greene and Monroe Counties wanted it included. As a contrast, thousands of citizen comments against building a new terrain highway, presented over twelve years, have been ignored.

Crane's relative isolation in this time of terrorist fears is a plus for the base; the weapons and munitions stored there are safer now than they would be with a Canada to Mexico truck corridor nearby. An article in Land Letter, October 31, 2002, states: **"Growing communities near military installations should take such facilities into consideration as they plan future land-use projects and growth patterns, according to a National Governors Association report. In fact, a top Pentagon official this week said communities who fail to do so could decrease the facilities' value, making it a prime target for closure in 2005."** It continues: **"DOD insists that urban encroachment, coupled with land-use limitations put in place by environmental laws, can adversely affect military training and readiness, especially as fighting continues in Afghanistan and the United Nations debates what to do in Iraq."** 2.3.2

Crane's physical product, military ordnance, is more safely and economically carried by existing rail infrastructure (which connects to all important national military installations.) while its knowledge products are best carried by fiber optic cables. 2.3.2

Chapter 3- ALTERNATIVES

Tiering is being abused by INDOT to avoid comparing alternatives on detailed impacts. Apparently, INDOT views this process as a test case for tiering (Appendix Y, MPO Scoping Meeting Feb. 23, 2000) for which INDOT says there are no specific guidelines. Failure to do a sufficiently thorough analysis now will lead to many problems in Tier 2. 5.1.1

Alternative A does not perform well partially because it already has good performance and upgrading US-41 will not add that much to it. Instead of viewing this as a plus it is downgraded. In fact, using US-41 and I-70 with the 641 bypass around Terre Haute would satisfy all of INDOT's performance measures and functions well on all core goals.

The No Build alternative apparently is US 41 with the 641 bypass and I-70 . It is the benchmark against which the other alternatives were measured. Alternative A is only an upgraded US-41. For some analyses, Level 2, no part of the National I-69 project is assumed to be built, including Evansville-Henderson (p 3-21). In level 3 it is assumed to be built (p. 3-21). INDOT can give no assurance when the entire Corr 18 will be built, if ever; therefore, any assumptions based on the completion of Corr 18 are not reliable. 3.4.1

On page 3-27 this statement appears: "This section contains the performance measure and cost information for the level 3- Detailed Analysis of Five Alternatives." Why only Five? Was a level 3 analysis performed only on the five "preferred" alternatives and not on Alternative 1 or the No Build Alternative? 3.4.1

Routes 3B and 3C are essentially the same except 3C enters SR-37 south of Bloomington and 3B enters SR-37 north of Bloomington. Why then is there a difference of 14,000 people within one hour of Indianapolis for these 2 routes, 6,000 with in 2 hours, and 80,000 with in three hours? (Table 3-5 "Year 2025 Increase in Number of People within Given Proximity") Why is there a difference of 26,000 in the number of people with in 30 minutes of a major metropolitan area? Similar discrepancies appear on other similar routes. This may be due to a "cliff effect" and can be very misleading. 3.4.1

According to Table 3-7 " Summary of Study Area Congestion Performances Indicators, by Alternative" , all alternative performances are about the same. INDOT's interpretation of this data (Summary, p 3-36) is unfounded.
INDOT's interpretation of Table 3-9, " Summary of Forecasted year 2025 Annual Crash Reductions, by Alternatives", also appears to be exaggerated. There is very little difference in fatalities and performance does not correlate with the amount of SR 37 used. For example, Alternative 5 used a much longer stretch of SR37 than does 2C, yet its performance is similar.
According to INDOT's, business accessibility tables (Table 3-11, 3-12, p. 3.39)

"...alternatives differ greatly in the additional markets which they open up to business. Generally, the Evansville region receives the greatest benefits, followed by either the Indianapolis or Bloomington region" (p.3-41). This indicates that most of the rural counties in the study area will benefit little from the I-69 extension on this performance measure.

As the DEIS points out, (p. 3-45): "Changes in roadside business sales give an estimate of what will happen in the immediate vicinity of where the highway would be located. However, most of the gains (or losses) would be offset by opposite changes elsewhere in SW Indiana" These are called "transfer effects" and indicate that for these sales there will be little overall improvement with in the study area. Also, in Appendix W, page 3, under the heading "Localized Impacts", the DEIS states: Overall, little or no **net** impact on sales in the study region would be expected as a result of traffic changes due to the highway project".

The factors listed on p. 3-29 are peripherally related to the project goals but are not project goals in themselves; however, they appear to become so for some of the alternative routes, e.g., Service to Bloomington, Service to Crane, Service to SR-37. Elevating these "factors" to the level of project goals disturbs and biases the alternatives analysis for this project. Alternative 1 cannot satisfy these factors and is put at an unfair advantage. The importance of these "factors" is stated in several places in this DEIS (e.g. p 3-88). This is an unfair distortion of the alternatives analysis. 3.4.2

The benefits of an improved US-41/I-70 are not all counted because the dEIS rigs the analysis to downplay the value of that alternative. It does this by ignoring the improvement of the entire route and only counting the improvements due to upgrading US41. Since the 641 bypass and I-70 improvements are considered "committed projects" their benefits are ignored for Alternative 1. The same approach is not used for SR-37 where several ongoing and planned improvement projects are <u>not</u> counted as "committed projects". If they were, the benefits of I-69 for the alternatives that use SR-37 would be lessened, as was done for Alternative 1. This clear bias must be corrected. Also, improved service to Crane is already in INDOT's Long Range Plan: "US-231 is part of the National Highway System, and is likely to be upgraded to 4 lanes by the time I-69 is constructed". (P.3-87)

As calculated using Table 3-25, page 3-45, the number of jobs predicted due to INDOT's "preferred" alternatives are minimal. They range from 4.1 to 6.8 per county per year over a 25 year period. It is unclear from this chart if the DEIS factored in the transfer effect of jobs lost on US41 if a "preferred alternative is chosen. This illustrates why job creation is not a core goal of this project, and why the economic benefits of the project are exaggerated. 3.4.4

In the areas of Business Accessibility, Long-term Economic Growth, and Personal Accessibility, the DEIS may be double counting benefits. Are benefits

counted for Corr 18 counted again in benefits to local and regional economies? 3.4.4

The statement on page 3-48, "There has been considerable anecdotal testimony offered which states that the loss of young workers due to lack of economic opportunity is a major factor limiting economic growth in SW Indiana" is totally unsubstantiated and irrelevant. As shown in Table 4-4 "Age Distribution" there is a higher percentage of people in the 18-64 category in the study area than in the State as a whole. (Note: using anecdotal hearsay from supporters of a new I-69 but ignoring voluminous, documented information by opponents indicates INDOT's bias in this study. 3.4.4

The use of "Transfer Payments" as a future economic indicator is likewise nonsense. What do veterans benefits and disability benefits have to do with building a new interstate highway? Doesn't Marion County with all its interstate highways have more of these payments than any county in rural southwest Indiana?

The Daily Truck Hours Saved performance is biased against Alternative 1 because it calculates savings over the no-build alternative. This means only the benefits of an improved US41 are counted, not the benefits of the 641 bypass or improvements to I-70.

As shown in Table 3-34, Operations and Maintenance costs for Alternative 1 are significantly less that all other alternatives.

<u>Intermodal Connectivity:</u>

Alternative 1 scores low even though it connects to the Indianapolis airport and the CSX Avon Freight Terminal. This is because these facilities are along I-70 and Alternative 1 benefits appear to be based solely on improvements to US-41.

Although the GIS information was used extensively in this DEIS, the digital route overlays were withheld from the public. Therefore, it is not possible to verify or contradict the DEIS's GIS data. This makes much of this study unverifiable and questionable. All of the GIS data should be released and the comment period extended to allow citizens and agencies to do an adequate review of the DEIS. 11.3

Since the "build" alternative will be based on a corridor, not just a working alignment, (p 4.2) entire corridors should be studied in detail in Tier 1, not just the working alignments. The analysis of working alignments done for this dEIS was too restrictive.

The DEIS's study of karst areas was very incomplete. Many karst features were missed and the potential impacts of highway construction through the karst areas was superficial. We refer INDOT to comments on this subject submitted by Mr. Gary Milhoan to Commissioner Nicol.

One of the basic tenants of the Karst Memorandum of Understanding (MOU) is to "avoid karst areas and use alternative drainage where possible." There are alternatives that do not cut through karst areas, e.g. Alternative 1.

As shown in Table 4-2, "Population Growth" the population of southwest Indiana, with and without the Indianapolis MSA counties, is growing. It is important to understand that rapid growth is not necessarily good or desirable. Age distribution in the Study Area is very similar to the State as a whole (Table 4-4, p 4-22). Simply to say that parts of the Study Area are not growing as fast as other areas is meaningless. To promote growth for the sake of growth is not a valid purpose for this project. 4.3.1

As shown in Table 4-7 "Education", the percent of the population within the Study Area in the various education levels corresponds closely to the State as a whole. The Study Area is approximately one third of the state and it has approximately one third of its population in each education level.

Employment growth in the Study Area, as shown in Table 4-8, is the same as the rest of Indiana. Even excluding the Indianapolis MSA, employment is growing significantly in SW Indiana. This is confirmed in Table 4-9. (Note: this data appears to contradict Figure 2-23. Which is correct?) 4.3.3

In the Regional Economic Needs Analysis, data from the Indianapolis MSA is excluded in some calculations. The DEIS states that this is because "...the hoped for economic impacts of the project are not directed at the Indianapolis region, but rather at the area in SW Indiana that lacks adequate highway access." This is a very prejudicial statement. It appears to rule out Alternative 1 as a viable option. What is

the definition of "adequate?" Also the DEIS acknowledges that many of the economic benefits of an I-69 extension on the "preferred" routes will go to the Evansville, Bloomington, and Indianapolis regions (p3-39). 4.3.3

Per Capita income in the Study Area, even excluding the Indianapolis MSA, is similar to the rest of the state (Table 4-10). There is only about a 8% difference, and this does not account for cost-of-living differences. Cost-of-living differences are not mentioned in this study.

As the DEIS shows, there is no lack of Colleges, Universities or airports in the Study Area.

Hospitals: The DEIS says that: "A four-lane interstate would provide a safer and faster transport for patients (p 4-27). This is irrelevant. Most critically injured patients are transported by Lifeline Helicopter Service. In other cases, speed is not necessary and in rural SW Indiana highways are safer than in many other parts of the state. 4.3.8

According to information derived from the DEIS, approximately 93 to 143 local roads will be permanently closed, depending on the alternative chosen, due to the construction of this limited access highway. This will have a major impact of local transportation, local businesses, emergency vehicle service, school bus routes and safety. The social and economic impact of these closings has been inadequately addressed in this study. The impacts to the Amish community that some of the routes would traverse would be especially disruptive.

Chapter 5-ENVIRONMENTAL CONSEQUENCES

Because INDOT has refused to release the digital route overlays for the GIS Study, we were unable to verify INDOT's data for indirect impacts.

The potential number of interchanges is on the high side (p. 5-4). How does this affect other calculations? e.g. economic impacts? Accessibility? It also may give a false sense of access to local communities that could be potentially cut off. The number of acres per interchange (10 acres, p. 5-4) also seems low, especially where I-69 will connect with I-70, I-465 and I-64. Because specific number and locations of interchanges will not be finalized until Tier 2, this information cannot be used to compare alternatives in Tier 1. 5.1.3

Indirect land use impacts, Figure 5.2-2, page 5-8, appears very low. The Toyota plant site in Gibson County has taken more than 1000 acres. Yet 1300 acres is the maximum projected indirect land use for any of the alternatives. Low indirect land use implies low economic development from I-69. The DEIS (p.5-11) states that most indirect impacts and land use change will occur along SR 37 and SR 57. Again, this implies that most future economic development will occur in those areas, not in other rural counties. 5.2

As the DEIS states, page 5-13, impacts to karst areas caused by indirect private development that follows the new highway could cause problems. INDOT disavows responsibility for these secondary and cumulative impacts. Alternative 1 does not impact karst areas so INDOT has an option to avoid these sensitive areas, as recommended in the karst MOU.

Right-of-way and relocation costs are underestimated based on the statement on page 5-16. Indeed, utility relocation costs have not been included, ROW and proposed interchanges have been estimated only. There is no mention of grade separation costs. Relocation costs are general and based on a "field survey" only. Mitigation costs are unknown but will be significant. Land values are generally underestimated. It is clear that the actual cost of this highway will far exceed the current estimates, as is typical for projects of this kind (See: "Underestimating Costs in Public Works Projects, error or lie?" American Planning Association Journal, Summer 2002, Vol. 68, No 3). 3.4.6

Traffic Impacts

It is unclear which scenario this DEIS used to calculate Table 5.8-1: "Year 2025 Percentage change in VMT on Major Corridors." Was induced and national/international travel included? Level of service (LOS) on I-70 is already "C" without adding travel lanes. Why is adding travel lanes a necessary project for the highway? According to the DEIS, "LOS C is " better than accepted planning LOS Standards for urban interstate. " page 5-43. 5.8 5.8

For Alternatives 2C, 3B, 3C, and 4C traffic on segments of I-465 would increase significantly (Table 5.8-1). The dEIS assumes this will be mitigated by making I-465 ten lanes; however, there is no indication when that widening would occur. If an acceptable LOS on I-465 depends on lane additions then the cost of that widening must be at least partially attributed to the I-69 project. Without the I-465 widening traffic congestion would increase on that highway with the I-69 increases. 5.8

None of the major corridors along the preferred alternatives would lose large amounts of traffic if alternative 1 were chosen for I-69. The opposite is not true for US41 (Table 5.8-1). The businesses along US41 would suffer disproportionately if one of INDOT's preferred alternatives is chosen. 5.5

This DEIS tries to have it both ways when considering increase in traffic due to I-69 and economic development. Pages 5-45-46 claim that in the 26 county study area VMT would be less than 1% due to I-69 yet elsewhere in the DEIS it implies effects on the regional and state economy would be significant. However on page 5-41, the dEIS states: "These model tests lead to the conclusion that the combined traffic effects of national I-69 travel and new economic development on the highway network would be minimal." This DEIS has not made the case that these apparently conflicting outcomes are verifiable. This is another example of how this DEIS downplays the negative impacts of the I-69 project and exaggerates the benefits, making its conclusions unreliable and suspect.

The DEIS states, p 5-44, that the I-69 extension would have little impact on the VMT for I-65 (4% to less than 1% diversion of traffic). Yet other parts of this dEIS claim that this diversion would have major impacts on NAFTA truck traffic flow for some alternatives (p. 3-50). Since alternatives were scored very differently on this core performance measure, this apparent contradiction must be better explained. In fact, there seems to be little difference among the alternatives for this measure. 5.8

Air Quality

No detailed local air quality analysis was done for the DEIS (p.5-47). Documentation of the claim of no significant impacts on air quality is assumed but will not be addressed until Tier 2 (p.5.52) This is not acceptable. This air quality analysis is based on VMT but this data is not given. Until the dEIS states the actual VMT predictions this analysis cannot be verified. Simply stating that the data comes from a model does not satisfy the need for the public or policy makers to confirm that INDOT's predictions are credible. 5.9

Labeling and explanations of Tables 5.9-1 and 5.9-2 are inadequate. Are these predicted levels over the baseline?
There is virtually no difference in the predicted emissions amounts among the alternatives. This would indicate no difference in the expected traffic volumes 5.9

among the alternatives. Likewise, Tables A-13 and A.14, Appendix A show little difference in the actual percentages of predicted vehicle miles and and vehicle hours of travel (VMT & VHT) on major highways in the Study Area. This does not correspond to the dEIS's predicted improvements in economic activity for the various alternatives. Also, Alternative 1 has less predicted traffic volumes but equal amounts of emissions? This must be explained. 5.9

The air quality analysis was done for Marion and Vanderburgh Counties only. What are the expected air quality impacts for other areas, especially those areas that currently have very clean air? 5.9

Noise

It is indisputable that there will be widespread and serious noise impacts due to the I-69 extension through SW Indiana. These impacts will be especially severe and widespread in rural areas. Unfortunately, the dEIS downplays noise impacts in rural areas because fewer people will be affected. The dEIS makes no statement on the noise impacts to wildlife. Non-human noise impacts must be addressed. 5.10

The noise analysis was insufficient and arbitrary for the entire 26 county Study Area (Table 5.10-2). A ten minute reading of noise levels at 11 sites in the middle of the day in early June is hardly representative of noise levels throughout a 24 hour period or throughout the year. The readings are especially suspect since all "noise" is treated equally, e.g. on p 5-56 the DEIS states: "Sound sources such as chirping birds, distant barking dogs, farm tractors in the background, distant thunder and the occasional car or truck passing along the rural road were not excluded from the sampling since these sources are considered part of the ambient noise environment." To equate chirping birds in the middle of the day to heavy truck traffic at midnight is ludicrous. Also, the noise readings were apparently taken during the BLA/INDOT bus tour for agency personnel. This would also add to the noise level. If the reading were done in this way in order to increase the baseline for rural noise impacts it is deceptive and misleading. 5.10

A high baseline noise level means higher dBAs must be reached (15dBA above baseline, p5.54) to achieve mitigation levels. In fact, the DEIS, page 5-57, states: "To assess the relative impact of each alternative, the number of potential residential receivers within the 66 dBA zone in urban/suburban settings and the 65dBA zone in rural settings was determined." This means noise levels in rural areas must reach nearly the same level as in urban areas to be considered a problem, thus dismissing the importance of relative quiet in rural areas. Lower noise impacts have higher impacts in rural areas.

Noise mitigation for this project is unlikely, as shown on page 5-68: For abatement measures to be undertaken they must be considered by INDOT to be "feasible and "reasonable". The conditions set by INDOT before mitigation is required are unlikely to be met, especially in rural areas.

Archeology

Please enter as comments the attached letter from consulting archaeologists Professors Patrick and Carol Munson. (Attachment C)

Figure 2 is not reliable or predictive

More thorough methods than those used for this DEIS have been used elsewhere and are more predictive. These methods can be used without compromising the protection of sensitive archeological sites. 5.13

The Maryland Ridge potential historic district is divided by alternative 3. See attached comments. (Attachment D) 5.13

The first meeting of all the Section 106 consulting parties was not held until May of 2002. This was very late in the development process and left insufficient time for potential Section 106 impacts to be adequately addressed by all parties. Also insufficient information was supplied for consulting members to verify the locations of potentially impacted historic sites in relation to the proposed alignments. For example, the Goss house near Paragon is within a proposed ROW but was not listed. 5.13

Figures 5.13-1, 2, 3, 4, and 5 appear to show far more potentially eligible properties for Section 106 designation than does Table 5.13-1. Why the apparent discrepancy? 5.13

Alternative 1 affects the fewest archeological sites (p. 5-93).

The DEIS states, page 5-95, that "creative mitigation" measures can be employed to reduce adverse effects on historic properties. What is "creative mitigation" and are those additional costs included in the cost estimates? 5.13

Mineral Resources

Once again, lack of the digital route overlays prevents us from verifying the DEIS's data on mineral resource impacts. Until this missing information is supplied, this DEIS is incomplete.

For example on page 5-99 the dEIS states that Alternatives 3B and 4C do not cross any areas of potential limestone deposits, but figure 5.14-6 shows these routes crossing limestone areas. Also,the Indiana Geological Survey publication: Geology for Environmental Planning in Monroe County, IN, contains a map (Figure 7, p. 14) showing dimensional limestone deposits from southern Monroe County to the north of Stinesville. Routes 3A,B,and C traverse this region. No dollar value is 5.14

put on the resources that could be impacted by the various alternatives. Some of these resources, e.g. dimensional limestone, could increase costs considerably on some of the alternatives. The DEIS for the Southwest Indiana Highway Corridor, 1996, Appendix H, contains a letter from Norman Hester, State Geologist, in which he estimates the value of the dimensional limestone could be hundreds of millions of dollars, depending on the route chosen. The routes he referred to are similar to some of the routes in this DEIS. 5.14

Alternative 1 has no impacts on limestone resources (Table 5:14, p. 5-96).

Visual Impacts

Except perhaps to highway engineers and politicians, interstates are not pretty. Simply listing the places a new I-69 would pass through does not explain the very serious visuals impacts this highway would have, especially in rural areas. As in other areas of environmental concern, Alternative 1 has the fewest visual impacts because it mainly uses existing four lane highways.

Excessive lighting would also impact the visual enjoyment of the night sky. The economic impacts of loss of visual pleasure, as with noise impacts, can be considerable. This cost should be included. 5.15

Under the no-build option the value of the scenery will not just remain the same, it will increase. This should be calculated for this DEIS.

Hazardous Sites

Bennett's Dump is on the edge of the working alignment for route 3B. Although it may not be directly impacted by construction, there may be underground contamination that could be disturbed and spread by nearby construction. This situation needs to be much more carefully studied. The simple dismissal of concern shown in the DEIS is careless and dangerous. In addition, and as the DEIS acknowledges, cleanup costs can be very expensive. 5.16

Alternative 3C has the most hazardous waste sites, Alternative 1 has the least.

Threatened and Endangered Species

Despite the DEIS's claim to have attempted to avoid threatened and endangered species, high quality natural communities and environmentally sensitive areas, many such areas are still impacted by INDOT's preferred alternatives. This is especially true of karst areas and the Patoka National Wetlands project.

All of the preferred Alternatives impact Indiana Bat habitat. Hibernacula are impacted on Alternative 3.

The karst areas along Alternative 3 have been poorly surveyed, if at all , and many karst features were missed and not shown on the Environmental Atlas. Potential impacts on caves, especially, is unknown. The area of sinking stream basins shown along route 3C is too small. We are aware of numerous springs and sinking intermittent streams not shown on the atlas. Many, many sinkholes were missed on route 3 through Greene and Monroe Counties and in Owen County on Alternatives 2 and 4. 5.24

The karst study done for this DEIS is completely inadequate and will lead to serious environmental problems if a route through the karst areas is chosen. This amounts to "pointing a loaded gun" at an environmentally sensitive area, a practice very much discouraged by NEPA.
Table 5.17-1 is not complete, especially for bird species. The red-shouldered hawk, e.g., has nested very close to the center line in Alternative 3C.

There is no analysis of secondary impacts on threatened, endangered and at risk species. These impacts must be addressed in this DEIS. 5.17

Wetlands

We could not verify the DEIS's data on wetlands impacted because INDOT/BLA have refused to allow us to see the digital route overlays for the GIS data. Apparently, calculations of exact amounts of wetlands impacts was not done and is not known (p8-142).

Table 5.19-1 estimates the amount of wetlands for mitigation but it does not show where they will occur, or how they will be constructed. The DEIS "anticipates" that the floodplain of the Patoka River will be bridged. This would be a very expensive project, especially since it would have to be built to withstand a major earthquake. SW Indiana is in the New Madrid Fault Zone and subject to major earthquakes. No estimate of the cost of this construction is given, nor is it assured that a bridge will be constructed. 5.19 5.18

Figure 8.19-4 shows only major wetland impacts; many smaller wetlands will also be impacted but are not shown. For this reason, it is highly probable that significant wetland impacts were not included. 5.19

Alternative 1 has the fewest impacts on floodplains and wetlands.

Agricultural Impacts:

Indiana is losing farmland at an unacceptable rate. From 1992-1997 124,200 acres of prime farmland were converted to developed land. Indiana ranks second in the U.S. in the highest percent of prime farmland converted. From 1978-1992 an average of 88,714 acres of farmland per year have been lost to other uses (p. 5-151). Comparable losses continue today.

The analysis of potential farmland impacts for this project did not follow the regular Farmland Conversion Impact Rating System (p. 5-155). However, the methodology used was not explained, except to say it relied on the GIS data. Once again, this data cannot be examined as we do not have access to the GIS digital route overlays. 5.20

The crop output of farmland varies from year to year due to varied growing conditions, but the yield is generally upward over time. This variability is not noted in the DEIS. Indeed, this DEIS uses a three year period for determining crop yields that were some of the worst years for crop yields in many SW Indiana counties (1998, 1999, 2000). For some counties it was the lowest yields ever for corn and also low for soybeans. An eight to ten year average should have been used for crop yields in order to get an accurate picture of crop production. 5.20

Prime farmland along SR-37 must be included as such and not devalued because it may be taken at some later time for development. 5.20

The methodology described on page 5-158 for farmland impacts appears to be flawed. The actual impacts on yields do not follow prescribed percentages and may vary widely, year to year and place to place, as shown in Table 5.20-3. 5.20

The DEIS's dismissal of farmland losses as a small percent of total farmland in the entire state is misleading. Local impacts will be significant not just because of the lost crop yields but also because of subsequent losses in related farm businesses. Road closings will also increase the difficulty and cost of farming and must be addressed in this analysis.

Secondary impacts must also be accurately estimated. Estimates of secondary impacts for this project appear unrealistically low. The Toyota industrial site in Gibson county took more than 1000 acres, yet the DEIS estimates a range of 955 to about 1200 among all its preferred alternatives for the entire route from Indianapolis to Evansville. In fact, the preferred alternatives of this project would take more farmland, directly and indirectly, than any other project proposed in the state. Denying this serious loss, in light of Indiana's continuing high losses elsewhere, indicate a reluctance to admit the seriousness of the impacts of this project on Indiana's farming economy. 5.20

Agricultural land values of $1288 to $4369 per acre are very low (p.5-152). More realistic values would range for $4000 to $10,000 per acre in Monroe County and much higher in Morgan and Marion counties. Farmland prices in rural agricultural counties to the south are more in the range of $3500-$4000 per acre. Current land value appraisals must be used for accurate and realistic estimates. 5.20

As noted in the DEIS, page 5-167, "Agricultural impacts in the form of permanent conversion of farmland to non-farmland use generally cannot be mitigated easily by the creation of new farmland elsewhere." 7.1

alternative 1 has the fewest impacts to farmland.

Forests

As the DEIS correctly states, page 5-169, "Impacts to forests resulting from the proposed project could be significant, depending on the alternative selected". In fact, all of INDOT's "preferred" alternatives will have more impacts on forest resources than Alternative 1.

Table 5.26-3 shows exactly the same amount of estimated forest acreage in SW Indiana in 2025 for all alternatives except Alternative 1. Alternatives 2-5 each show a loss of exactly 1500 acres. This table shows significant variation among the routes for direct and indirect losses of forest land, yet the DEIS apparently assumes no long-term variations. This overly simplified, generalized analysis is highly unrealistic. 5.21

The DEIS data on forest impacts could not be verified because we have been denied access to the necessary GIS data. Alternative 1 has the least impacts on forest resources.

Mitigation plans for loss of forests are totally inadequate. There are no ratios given and no indication where mitigation might occur or when, and no cost estimates are given. 7.1

Increasingly rare and valuable core forest habitat would also be disrupted. There is virtually no way to mitigate this type of loss and its impacts on wildlife, including Threatened, Endangered and At Risk species. Habitat loss continues to be one of the major factors in the decline of many species of plants and animals in Indiana. The treatment of forests impacts for this DEIS is very inadequate, contradictory and generally unreliable.

Water Body Impacts

"Alternative 1 crosses the least amount of Open Water Habitat and is similar to the other alternatives for number of crossed perennial and intermittent streams." (p. 5-175). However, INDOT's preferred routes would cross streams in new locations, whereas the crossings on US 41 already exist. Alternative 3 also crosses extensive karst areas with the potential for serious negative impacts on water quality. There would be no karst impacts on Alternative 1. The existing bridges on that route would be modified and utilized (p.5-178).

Ecosystem Impacts

All of INDOT's preferred alternatives have core forest impacts (5-195). These areas are especially valuable and increasingly rare and should not be disturbed

Alternative 3B's impact on Garrison Chapel Valley has not been adequately addressed. This sensitive karst area with known Endangered species must be more thoroughly studied.

Alternative 1 has no impacts on core forests.

Subsurface drainage areas are impacted by Alternative 3B and C. These crossings occur in areas other than along SR 37. For example, Alt. 3 crosses sinking stream basins not shown on the Environmental Atlas. These drainage patterns should be studied now and not put off until in Tier 2. Serious consequences to water quality could result from construction in these areas that many not be mitigable. Many people in these areas rely on wells for their water supply and these may be threatened. 5.23

GIS data for analyses of these sites was not verifiable because the digital route layers were withheld from the public.

Water Quality Impacts

The analyses of pollutants in highway runoff was based on one 1981 study that is out of date and unreliable (p. 5-204). This highway will be a major truck corridor and hazardous materials route. Twenty-year-old studies are not adequate for this project. Many current studies on the impacts of highway runoff are available and should be used. This problem is especially significant in karst areas where runoff and accidental spills will be a major concern. 5.24

The analysis of runoff impacts in this DEIS is inadequate. This section should also address the potential for accidental spills, especially in karst areas and how they will be handled.

Cumulative Impacts

Cumulative impacts on rivers and streams, karst areas, wildlife, including at risk species, must be included in this Tier 1 study. 5.26

The percent of wetland losses are based on acreage in 1980. What is the current acreage of wetlands? 5.26

Figure 5.26-7 is misleading. It appears to show all route alternatives having essentially the same amount of "other" losses of farmland. This must be explained as it seems rather improbable. Alternate 1 uses existing highways where many of the farmland impacts could be expected to have already occurred. The other routes use mostly new terrain so more additional losses are expected.

Figure 5.26-4 has no predicted forest acreages for 2025. However, pp. 221 and 223, and Table 5-26.3 indicate very low impacts to forest land from I-69 over time. For routes 2C, 3A,B, and C, and routes 5A and 5B, Table 5.26-3 shows forest land increasing over the losses due to I-69. These optimistic projections are unfounded. Although forest losses declined in Indiana over a period of years they are once again increasing. 5.26

The DEIS assumes farmland will continue to be lost at the same rate in the future as it has been in the past (p. 221). This assumption may not be justified as concern for farmland loss is growing. This concern for loss of farmland is one of main objections to INDOT's preferred alternatives for I-69. The Hoosier Farmland Preservation Task Force Final Report, 1 January 1999, is an indication of the growing concern for the loss of farmland in Indiana. 5.26

Cumulative effects of salt and other pollutants over time must be addressed in this DEIS, especially in karst areas. 5.26

Depending upon the alternative, anywhere from around 100 to 150 local roads will be closed because of this project. The cumulative impacts of these closing on local communities has not been thoroughly studied. Increases in energy use (fuel), safety impacts as well as economic impacts due to road closing must be studied and shown for this project.

Energy Impacts

The differences between alternative 3C and 3B in Table 5.27-1, Additional Energy Consumed", is suspicious. These alternatives are essentially the same as most of the route and enter SR37 only a few miles apart. This difference must be explained. Is it once again due to the cliff effect? 5.27

The DEIS page 5-228, lists noise, visual impacts, impacts to wildlife, wetlands and forest, as well as home and business relocations as" temporary. In fact these disturbances are permanent.

An Amish settlement occurs along alternatives 3 and 4. This district may be eligible for the National Register. The DEIS acknowledges that "intensive research must be conducted" to determine the viability and boundaries of the district. Although the DEIS stresses the paucity of historic buildings, this area may be a traditional cultural landscape rather than an historic district. Consideration of the impacts on the Amish settlements along Alternatives 3 and 4 is inadequate.

ENVIRONMENTAL ATLAS

There is much useful information in the GIS overlays of the aerial photos; however, because the digital route overlays were withheld, the GIS as a whole is essentially worthless for confirming the impacts given in the DEIS. Failure to release these vital overlays prevents a thorough review of the GIS and the entire DEIS. Why is this information is being withheld? What is INDOT hiding?

The portion of route 3C from where it separates from 3A and 3B until it connects to SR 37 is a heavily karstic area. There are numerous sinkholes, sinking streams, and springs in the area that are not shown in the Environmental Atlas. The same is true of 3B from where it separates from 3C until it connects to SR37. Because these karst areas have been poorly surveyed, many karst features were not recorded and therefore these areas are not correctly characterized for these features. These omissions will cause serious problems and delays if route 3C or 3B is selected for the I-69 extension. This will also greatly increase the cost of building through these areas. Karst areas on Alternatives 2 and 4 in Owen County were also missed.

Many small cemeteries were omitted from the Environmental Atlas for routes 3A, B and C. Other larger, clearly visible cemeteries are shown on the Environmental Atlas as being directly in the ROW, e.g., the Storm Cemetery (Sec. 36, Center Township, Greene Co.) is shown in the Atlas as directly on the centerline where a bridge will cross Indian Creek. There are 75-100 tombstones in this cemetery, three of which are for veterans of the Revolutionary War. This cemetery is located in a place where the working alignment is narrowed to cross Indian Creek so there is no wiggle room to avoid the cemetery on this alignment.

Many newer homes are not shown on the Environmental Atlas and were apparently not included in the impacts for the preferred atlas. We were unable to check this carefully because we did not have access to the digital overlays for the GIS.

Because of the poor quality of the aerial photos many local roads could not be precisely located. Since many of these roads will be closed their location must be clearly shown to assess the impact on communities and local travel.

Chapter 7 MITIGATION

This chapter on mitigation of impacts is so vague and general that it is virtually worthless. No mitigation is assured. Although some specific measures are listed they are qualified by statements such as: "In the Tier 2 NEPA studies, the mitigation identified in Tier 1...will be refined with greater detail." (Chapter 7, P. 7-1) 7.1

Mitigation of impacts "where reasonable" is a phrase read often in this document. E.g. under "Noise Impacts" the document states: "Once highway noise impacted sites have been identified, they must be further evaluated to determine whether abatement is both feasible and reasonable." The document then gives a long list of criteria for what is feasible and reasonable, but nothing will be decided until Tier 2.

Under "Water Quality Impacts (p. 7-7) many of the mitigation measures are qualified, e.g."... cross rivers and streams at their narrowest floodway width, and reduce the number of stream relocations and floodplain encroachments where reasonable." (Emphasis added.)

"3... disturbed in stream habitat should be returned to its original condition when possible upon completion of the construction in the area."

"4... minimize tree clearing near streams and rivers."

"5...avoid wetlands as much as possible..."

"8...avoid sinking basins and sinkholes as much as possible..."

Impacts to floodplains will be "minimized, when reasonable..." by design practices. But there is no detail or assurances.

Under "Water Body Modification" the DEIS states: "Best Management Practices (BMP) should be used to avoid and minimize impacts to rivers and streams." No assurances.

For Section 106--Historic Resources, the DEIS says that mitigation will be "considered" for 106 sites. Again, no assurances.

In fact, most if not all, mitigation decisions are relegated to Tier 2, so there is little basis for determining what will actually be done.

Although INDOT states it will follow the Memorandum of Understanding for karst areas and wetlands, these measures apparently will not be in force until Tier 2.

The karst MOU states under item 1, p. 1, "INDOT in cooperation with the IDNR, IDEM, and USFWS shall determine the location of sinkholes, caves, underground streams, and other related karst features and their relationship prior to proposed alterations or construction in karst regions of the state...the choice of the consultant retained by INDOT will be subject to the review of IDNR, USFWS and IDEM." To date, this has not been done. As a result, many karst features have been missed and comparison of alternatives with regard to karst impacts cannot be verified. 7.1

The karst MOU further states: "The interest of INDOT is to avoid karst areas and use alternative drainages where possible." Since Alternative 1 does not disturb karst areas, karst impacts can reasonably be avoided.

There is no mention in the DEIS of compliance with the Federal Cave Protection Act which may be relevant here. 7.1

Although the DEIS states that the MOU for wetlands will be followed, there are no details as to where the mitigation of wetlands will occur. In some instance (Appendix Y, letter from IDNR dated 16 July 01) there is an indication that replacement of wetland losses may occur far from the areas where the loss occurs. However Natural Resources Commission Information Bulletin #17 Subject: Wetlands & Habitat Mitigation states: " The standard minimum ratio may be increased if replacement does not occur on the same stream or within a 2.5 mile diameter of the disturbed site." Also, on p. 4 of this document is the statement: "mitigation outside of the 8 digit hydrologic unit will likely be denied." Does INDOT intend to follow these rules? If not, are the wetland mitigation measures discussed in this DEIS credible? 7.1

The first item in the MOU for wetlands states: "INDOT will utilize the Federal Manual for Identifying and Delineating Jurisdictional Wetlands. The IDNR and USFWS will be requested to review and comment on INDOT's findings at the earliest coordination phase of project development" (p.1, MOU for Wetland Mitigation, 28 Jan 01). For this DEIS, INDOT did not use the this manual and wetlands potentially impacted were not delineated (5-142). 7.1
Since wetland impacts are unknown at this stage, due to the lack of a careful study, fulfillment of all further requirements of the MOU are in doubt.

There is little detail or commitment on forest mitigation for this project. Simply to state: "INDOT will consult appropriate resource agencies." is simply not adequate. Mitigation ratios must be given and areas for mitigation specified.

It is important to note that the DEIS defines a forest as: "Land that is at least 1 acre in area, 129 feet wide, and 10% covered by trees of any size." For mitigation purposes this definition will not satisfy the loss of larger tracts of mature forests, especially core forest areas. It appears that loss of, and damage to forests, and all their attendant values by this project will be extensive and permanent, depending

on the route chosen. Alternative 1 has the least forest impacts and no impacts to large, core forest areas.

Simply stating that social impacts will be mitigated "where reasonable" by the use of frontage and access roads to maintain accessibility is vague and offers no assurance of any mitigation. The same is true of noise mitigation. The dEIS qualifies all proposed measures by stating the;y will be carried out where "feasible and reasonable". Who is to decide what is feasible and reasonable? How much will depend on available funding? 7.1

The dEIS acknowledges that it is difficult to replace lost farmland and apparently no attempt will be made to do so. The DEIS merely states, for agricultural mitigation, "Corridors should follow existing property lines and minimize dividing or splitting of large tracts of farmland where reasonable." (emphasis added) In short, there is virtually no assurance of mitigation for loss of farmland due to this project.

On the whole, the DEIS completely fails to give mitigation enough detail or with adequate assurances to ensure mitigation for impacts will be done. All mitigation measures should be spelled out in detail and be prescriptive, clearly stating the ratios and measures to be used and specifying where they will be done and when.

Mitigation could involve the purchase of thousands of acres of additional land, yet there is no indication of the potential cost of these purchases and how they may vary among the alternatives. After-the-fact determination of mitigation measures in Tier 2 will be subject to cost and time constraints with little leverage by concerned agencies or the public to influence decisions. 7.1

Chapter 8-4 (F)

4 (f) properties appear to have been missed in the DEIS. A park along Mann Road in Morgan County will be impacted as well as a portion of Martin State Forest in Greene County. A potential Historic District in Greene County is also impacted on Alternative 3. (See the Maryland Ridge Application to the National Registry of Historic Places, Attachment D.)

Rural Preservation Districts and Multiple Property Resources need to be identified. This process takes time and the methodology of the consultants was insufficient to identify all of the eligible properties. More time should have been spent traveling all of the prospective routes so that meaningful comparisons could be made. For example, SR-67 has numerous examples of early and mid twentieth century roadside architectural and sections that are virtual time warps of the 1930s and other periods, but most of these have not been identified. The reconfiguration 5.13

of SR-37 into I-69 along a new Mann Road Corridor proves that obviously important historic resources were ignored. The Nicholson-Rand House, likely the most magnificent nineteenth century house in Decatur Township and a rare example of rural Gothic Revival architecture, is threatened even as the process is well underway for its listing in the National Register of Historic Places. To the consultant's credit, this resource has been reclassified, but only after the owner persisted in having them reexamine their finding that is was not eligible. How many others were missed? 5.13

Section 6(f) Resources

A letter from Patrick Ralston, past Director of IDNR, appears in Appendix Y and indicates that alternatives 3 and 4 may impact the Sugar Ridge Fish and Wildlife Area. Portions of this area have been acquired or developed (or both) with federal Land and Water Conservation Act (LAWCON) funds. Any negative impacts to this or other LAWCON sites may require a Section 6(f) conversion. Alternatives 3 and 4 come so close this facility as to impair its use for conservation and recreation, thereby indirectly/constructively converting at least a part of it. Such conversions cannot be done without approval of the US National Park Service pursuant to statute and regulations.

Chapter 11-COMMENTS, etc.

The dEIS states, page 11-3, "Thus, while this study focuses on the proposed completion of I-69 from Evansville to Indianapolis, it does not assume that this section of I-69 must built. Rather, this study is intended to assist government decision makers in deciding (1) whether to complete I-69 as an Interstate between Evansville and Indianapolis and if so, (2) which corridor should be selected as this project,." Based on this statement, all references to Corridor 18, the Canada to Mexico project should be excluded from this document. The completion of Corridor 18 through Indiana as a core goal of the project should be removed. All analyses that use data that depend on the completion of, or need for, Corridor 18 should be taken out of this DEIS.

Since completion of Corridor 18 is not a valid reason for the project, non highway alternatives and other measures for economic development should be considered and included in this DEIS

Pages 11-7 to 11-10 list the meetings that took place between INDOT /BLA and various groups. A total of 144 meetings are listed 64 (44% were with pro new terrain highway groups, 20 (14% were with supporters of the US41/I-70 groups, and 60 (42%) were with neutral groups. Three times as many meeting were held with pro-new terrain groups as with pro US41/1-70 groups. A clear bias shows here. In addition, the INDOT sponsored I-69 newsletter is blatantly pro new highway and little more than a propaganda tool for INDOT's preferred alternatives. 11.3

This DEIS states, p. 11-12, that "Some type of response to the comments made for the 1996 Study will be made in the current study." We wish to make it clear that our comments on the 1996 DEIS for this project are also submitted as official comments on this current study.

Submitted by
Thomas Tokarski, President
Citizens for Appropriate Rural Roads. Inc
5 November 2002

Attachment A

CARR's Comments on the DEIS for the SW Indiana Highway Corridor

July 1996

COMMENTS OF

CITIZENS FOR APPROPRIATE RURAL ROADS

ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

FOR THE SOUTHWEST INDIANA HIGHWAY CORRIDOR

July 1996

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INTRODUCTION

Citizens for Appropriate Rural Roads (CARR) is a grassroots organization working to proteot the integrity of our farmland, forestlands, and rural communities by supporting fiscally conservative and environmentally sound transportation policies.

CARR is opposed to the current plan for the Southwest Indiana Highway Corridor. We are opposed to all alternatives that use significant new terrain and place an unacceptable financial burden on the citizens of Indiana and the Nation.

This draft Environmental Impact Statement (dEIS) fails to fufill many major requirements of the National Environmental Policy Act (NEPA):

1) The entire project is illegally segmented.

2) It does not consider all reasonable alternatives to an environmentally destructive and extravagantly expensive new terrain route.

3) The "Purpose and Needs" section does not supply sufficient justification for the preferred alternative, or the project as a whole.

4) It is based on biased analyses which attempt to justify decisions already made.

5) It contains incomplete, inadequate, and out-of-date information; as a result, cost estimates, and environmental, and social impacts cannot be realistically and completely assessed.

6) It does not adequately address indirect and cumulative impacts of the project.

7) It does not adequately address the impacts, costs, and implementation of mitigation procedures.

In addition to these NEPA violations, there are other serious deficiencies, i.e., major costs of the project are omitted, leading to an invalid economic assessment and the project relies on an unrealistically short construction time.

The Southwest Indiana Highway Feasibility Study (1990), prepared by Donohue, et al., which studied several alternatives for another major highway connecting Indianapolis and Evansville, determined that: "This project would be the most costly highway built in the State of Indiana since development of the interstate system."

Unfortunately, many costs of this project were not included in this dEIS. If all costs were included, the Benefit/Cost Ratio

would be so low that it would prove to be a poor public investment. Since no Benefit/Cost Ratios were obtained for reasonable alternatives to the preferred route, there is no way to compare this project with other transportation investment options.

This project necessitates the direct taking of nearly 5,000 acres of farmland, forestland, other types of land. Much more land will be lost to agriculture and natural resources due to subsequent development. Few of these impacts can be mitigated.

Donohue et al., state: "Of all the proposed highway alternatives, the most environmentally sensitive areas occur on alignment through new location along Corridors AB and C... The combined presence of forests, unique geological features, and threatened and endangered species heighten the sensitivity of these areas to mutiple impacts caused by highway construction and development." Corridor "AB" is the Bloomington to SR-57 segment of the project under consideration in this dEIS. Serious wetland and farmland impacts occur along the southern end of the preferred corridor.

It is important to note that the Donohue et al., Study, while studying the same general project, did not recommend construction for any of the alternatives it considered.

There is a serious risk that this project may be begun and never completed. A reliable, long term source of funding for this project has not been identified. Indeed, as we will show in our specific comments, the Indiana Department of Transportation (INDOT) currently has no known source of funding for much of the expected costs of this project. INDOT's willingness to begin this project without assurances that it has the necessary resources, and committment, to complete it in a timely manner, means severe environmental damage may occur with little or no economic payback. This would be a tragic waste of monetary as well environmental resources.

INDOT's goal of "opening up" SW Indiana for economic development with this highway means displacing and severing viable agricultural communities and destroying valuable natural resources. This will not improve the economy of the region but merely replace one type of economy with another, less appropriate type.

Much of this region of the State, as this dEIS is forced to admit, is already doing well economically, and these are the areas that would be further developed by this highway. On the other hand, the data in this dEIS shows that the areas the document claims are most economically needy (note that we do not agree with this assessment), would gain little, if at all, from this highway.

The choice of the preferred alternative was a political rather than a sound transportation decision. As a result, the

citizens of Indiana do not have the choice of deciding what types of transportation options, including non-highway options, would most benefit this region and the entire State of Indiana.

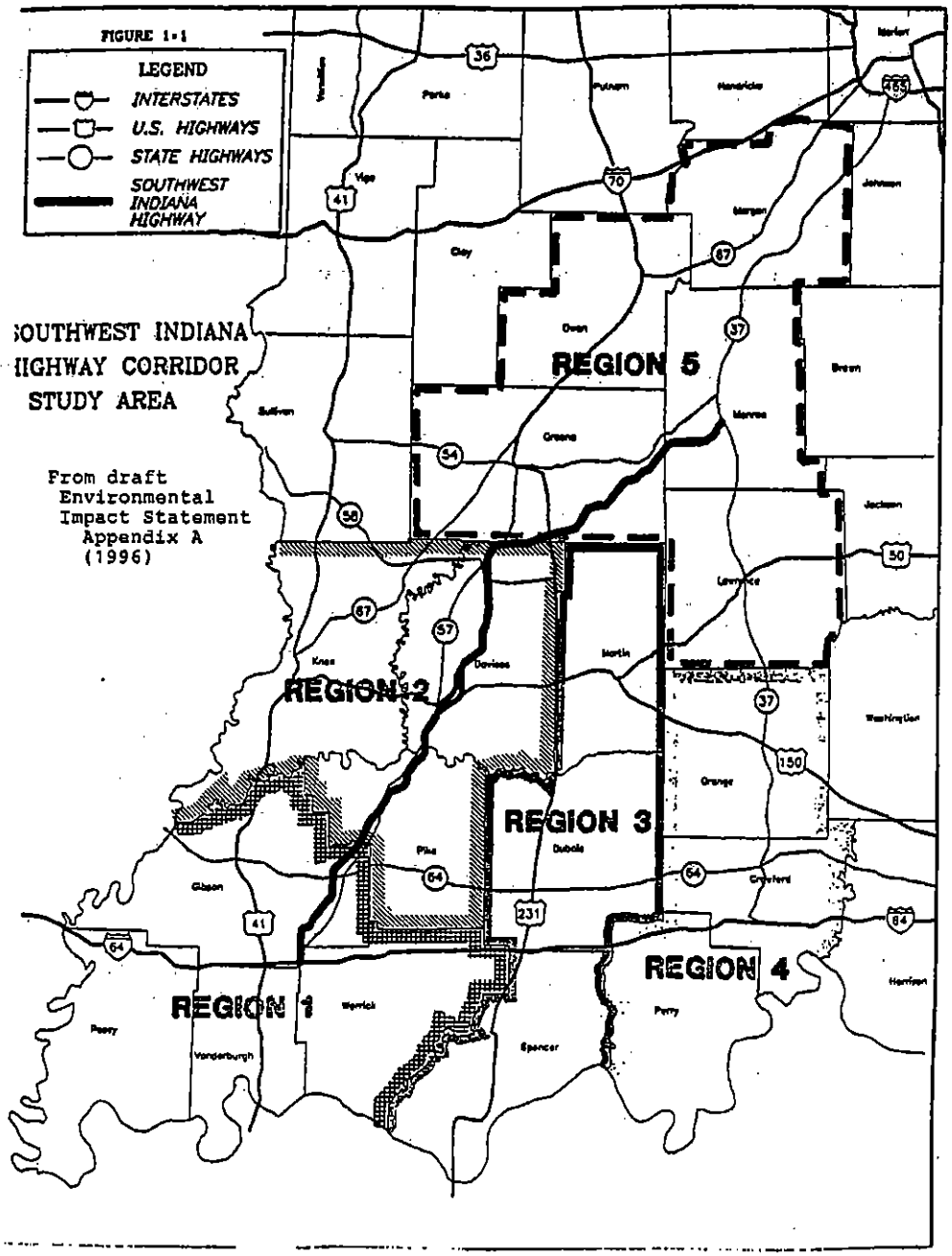
Statewide opposition to this new terrain highway proposal is widespread, persistent, and substantial. Signatures on petitions opposing it now number around 65,000. These have been submitted as comments on this dEIS.

The Green Scissors Report, for 1995 and 1996, co-signed by numerous nationally based taxpayer-rights and environmental groups, listed the I-69 project, of which this highway is a segment, as one of the top ten porkbarrel projects in the nation.

We ask INDOT to withdraw this draft EIS in order to correct all deficiencies. When this is properly done it will show that this project will not bring sufficient, appropriate, economic development to the region, or improve highway safety. The realistic benefits expected from this project clearly do not justify the severe damage it will bring to the environment, rural communities, and the economy of Indiana.

We further ask that INDOT abandon any plans for new terrain construction for the Southwest Indiana Highway Corridor, or I-69, (or any other name they may call it in the future), for connecting Indianapolis with Evansville, and study all reasonable alternatives, including the US-41/I-70 route.

FIGURE 1-1



PURPOSE AND NEEDS

*** Much of the information in this dEIS is taken from the Southwest Indiana Highway Feasibility Study (1990), by Donohue, et al. A follow-up newsletter to the Donohue et al. Study, entitled: Southwest Indiana Highway Feasibility Newsletter, a Special Information Bulletin from the Indiana Department of Transportation and Donohue & Associates, Inc., July 1989, under the headline: "Encouraging Economic Outlook for Region" states:

> "What will be the economic future of Southwest Indiana if none of the alternative corridor improvements are built. Assuming no changes in the regional highway network, Southwest Indiana can still expect to experience employment increases of up to 40 percent over the 1985 levels by the year 2020. The most rapidly growing parts of the region will be the area of Martin, Dubois and Spencer Counties where employment increases should exceed 43% and in the Bloomington/Bedford area, including Owen, Greene, Morgan, and Monroe, and Lawrence Counties with a forecast employment growth rate of 40%."

It goes on:

> "With enhanced regional cooperation between communities and counties, Southwest Indiana can expect to capture its share of the growth occurring in midwestern states today."

To a great extent this forecast is being fulfilled. Jobs and populations are up in all of SW Indiana. In some areas, such as Bloomington/Monroe County, and Owen and Greene Counties, the population is increasing so fast it is creating social and environmental problems. As pointed out in this dEIS, in some areas there is underemployment and workers are being imported.

Some counties in the 18 county study area may be hurt economically by this proposed highway as traffic is diverted to the new terrain interstate.

In general, the economic realities of SW Indiana are much more complex than this dEIS implies. The limited, biased statistics cited and the amount of anecdotal evidence used oversimplifies and distorts the actual economic picture. If the raison d'etre of this project is economic development then a much more thorough, authoritative, and current study of the economy of this region is required. We will elaborate on these problems in our comments.

*** The dEIS's assertion on page 25 that SR-37 will complete the purpose of connecting some counties in SW Indiana to Indianapolis with a 4-lane highway is, for all practical purposes, negated in the very next paragraph. SR-37 will fail due to the construction of the new interstate and will have to be improved. This means that this new highway will not fulfill one of its fundamental purposes. Indeed, it will cause a major highway to fail sooner than expected and degrade travel in SW Indiana.

*** Population trends in the dEIS are given for only some of the counties in southwest Indiana along the preferred corridor. Figures for Vanderburgh, Monroe and Warrick counties were absent. Current population data (Indiana Population Report, Volume 7, No.1, Spring 95, published by Indiana Business Research Center, Indiana University School of Business) shows these three counties gaining significant population from 1990-1994. Indeed, all the counties in the study areas of Southwest Indiana gained population from 1990 to 1994, except Perry county, which is on I-64. Significantly, Blackford, Delaware and Grant counties, on or near existing I-69 in northeast Indiana, are among the few counties in the state that lost population from 1990 to 1994. Most of the fastest growing counties in Indiana are near large cities, Indianapolis, Cincinnati, Chicago. The 1994-95 Indiana Factbook shows that of the 47 counties that lost population from 1980-90, 26 (55%) were on or near an interstate.

As the data in the dEIS shows (fig.5, p.8), population in the representative counties along I-65 surpassed the representative counties in southwest Indiana counties in 1950, twenty years before I-65 was built. By 1980, the population in SC Indiana counties leveled off and increased little more than in the SW counties.

Historical reasons for the decline in population may have nothing to do with highways. In SW and SC Indiana population trends had more to do with the changes in farming practices.

Since the number of farms in the U.S. is steadily declining a stable population in agricultural-based SW Indiana is actually a positive sign. There is now a healthy agricultural economy in SW Indiana that will be degraded by this new terrain highway. Over 200 farming operations will be split up, over 3,000 acres of farmland taken, other fields will be at risk due to highway induced flooding, and many rural communities will be divided. This will have serious negative impacts on the economy of this region. Unfortunately, all of these negative impacts were not addressed in this dEIS.

The scale of the population graphs in Figure 1 and Figure 3 are different. This makes the line for SW Indiana appear flatter than for SE Indiana. If Scott and Jackson counties were plotted on Figure 1, they would appear no different than the SW Indiana counties. This is a minor point, but it indicates a bias in the dEIS.

It should also be acknowledged that there is nothing wrong with a slowly growing or stable population. In a world that is already seriously over populated, a stable population is a goal that we should be encouraging. Also since the world's food supply is currently less than needed, we should not be discouraging and hampering farming operations with projects such as this highway.

*** Figures 2 and 6, concerning business trends in SW Indiana also did not include all the counties along the route for the highway. Monroe, Vanderburgh and Warrick counties were once again left out. These counties are doing well in terms of

business growth.

A report in the Evansville Courier, 13 May 1994, wrote concerning Evansville Mayor Frank McDonald's assessment of his city's economic status: "...McDonald said Evansville now is better off than it has been for years. With Whirlpool's growth to over 5,500 employees, local manufaturing employment is at its highest level in 10 years, and county building permits for the first quarter of this year were up 13% from last year.

He said the magazine City and State ranked Evansville 12th among the top 25 'up and coming cities' with populations over 100,000. The magazine's survey in its December issue said Evansville was No. 1 in job growth among the cities from 1991-1993."

Linda Williamson, executive director of the Bloomington Economic Development Corp., is quoted in a Herald-Times newpaper report on 31 July 94, echoing a similar assessment for Bloomington: "I agree with the employment numbers. They reflect a strong economy and prove that things are going well. The nay sayers are not tuned in to what's going on. I think we're doing better than people think. We have a real mix of markets and our industy has re-tooled and re-trained to be effective players in the global economy."

In another Herald-Times article she remained optimistic: "She said there was $164.9 million in new investment by 12 local industries in 1994, creating 541 new jobs."

The graphs do show that all of the representative counties in the study showed growth in the number of businesses for the 23 year period from 1970 to 1993.

Pike County showed the least amount of growth but for reasons unrelated to highways. Pike County has reasonably good access to I-64 and US-41. Pike County is suffering now from a lack of economic foresight and planning and from the consequences of the exploitation of its natural resources. Pike was a wealthy county while it was strip mining its coal resources at the expense of its agricultural resources. Now the coal is nearly gone, the money it brought is gone, and the farms that were displaced to mine the coal are also gone. The counties surrounding Pike County: Daviess, Dubois, and Gibson, are all doing well economically with essentially the same transportation system that Pike County has. Farms that remain in Pike and surrounding counties should not once again be destroyed for the mistaken belief that highways are economic saviors.

More than the other counties along the preferred corridor, Pike County will lose economically from this project. It has few incentives to attract business and removing traffic from SR-57 will hurt existing businesses. The mayor of Petersburg expressed this concern at the public hearing for the dEIS. His concern is that Petersburg will be bypassed and forgotten, especially since there is only one interchange planned for the city.

*** This dEIS repeats over and over that SW Indiana counties, including Gibson County, have had trouble attracting businesses, then it is forced to acknowledge that Gibson County will be

the site of a new Toyota plant that will employ up to 1700 people. The reason, it says, is because the site is on a 4-lane highway, not an interstate but a 4-lane. Yet this dEIS did not study 4-lane roads as alternatives to interstates. And it dismissed the ability of an upgraded US 41 to improve transportation for any county but Gibson. This displays an obvious bias in favor of the preferred project, for improving transportation in SW Indiana. This bias is reinforced as all reasonable alternatives are summarily dismissed.

*** The dEIS goes to great lengths to compare SW Indiana with some counties along I-65 in Southcentral Indiana. One can, of course, bolster one's case by making carefully selected comparisons. We could, for example, compare the counties along the preferred route in southwestern Indiana with some of the counties along existing I-69 in northeastern Indiana. Delaware, Grant, and Blackford counties all show population losses in the latest statistics, and Muncie, with direct access to I-69, is in serious economic trouble. Many counties near interstates do not have the economic activity claimed for the one small segment along I-65 that was used to compare to Southwestern Indiana. We could also compare the economy of SW Indiana to the economy of northwestern Indiana where there are lots of interstates.

To make the basic assumption that the economy of SW Indiana is bad, and then look around for examples to prove it, is an invalid way to conduct a study.

Clearly, highways, even interstate highways, are not panaceas, but this dEIS implies, by their choice of comparisons, that they are. The acknowledgement in passing that other factors are also important does not hide the dEIS's deep-rooted bias in favor of highway construction over other means to improve economies. This bias has so blinded this dEIS to other possibilites that its consideration of alternatives is totally inadequate. In places it reads more like I-69 booster literature than an objective analysis of this project.

The official bias towards this project was also revealed at the public Hearings for this dEIS. Several people commented that, listening to the official presentation, they could not tell the difference between INDOT and Bernardin-Lochmueller, & Associates (the lead consultant for the dEIS) and Voices for I-69, a group lobbying for this highway.

*** Use of anecdotal comments by confirmed I-69 boosters to justify this highway is another sign of this bias. Surely comments by authoritative people expressing a different point of view could have been included.

The statement by Mr. Cox, (a charter member of the Southwestern Indiana Regional Highway Coalition) on page 11 that three out of four manufacturing businesses need to be within five miles of an interstate is so patently wrong that it hurts his own case. How can this highway help the economy of all of SW Indiana, as stated elsewhere in the dEIS, if it will only attract manufacturing businesses to a five mile wide band?

There are numerous recent examples in Indiana of manufacturers that located far from interstates. For example, a steel mill in Butler and the GM expansion in Kokomo. The Toyota plant that will be built in Gibson County is on US-41, nearly ten miles from I-64. Other non-manufacturing businesses will also locate far from interstates, e.g., the super Walmart in Linton and the Tyson food processing plant in Portland. No doubt some manufacturers require nearness to an interstate, but we seriously question if 75% do.

Stating that certain unnamed companies did not locate in SW Indiana because there is no interstate nearby is unverifiable heresay. There is no way to confirm or deny these allegations. The references to "unpublished data" also makes it difficult to verify that data.

Many times companies will give the excuse of lack of a highway, or lack of something, for not locating in a city. This is done to let the people involved down easy, to not belittle their city. The real reason for not coming may have been something else entirely. This is a common practice.

From the information in this dEIS we would have to conclude that any city not near an interstate is doomed to economic ruin. Should we then build an interstate highway to every city of 10,000 or more? There are examples across Indiana of cities that are doing well without a nearby interstate, e.g., Bloomington, Jasper/Huntingburg, Princeton, Madison, and Kokomo. (The dEIS wrongly states that IU Kokomo is near an interstate. The campus is thirty miles from an interstate.) On the other hand, some cities near an interstate are not doing well, e.g., Muncie, Gary/Hammond, Crawfordsville, Brazil, and Terre Haute.

Once again, interstate highways can be a factor in economic well-being but they are not necessary or sufficient by themselves. The potential for this one highway to improve the economy of SW Indiana is not as simple or certain as this dEIS would have us believe.

Also, references to the importance of a "superior transportation system" (p. 11) certainly means more than just lots of big highways. To equate it to just highways, as this dEIS does, is another example of this documents innate highway bias.

*** Citing the Hudson Institute Study, The Future of Southern Rural Indiana: Paradigms and Prospects For Rural Development (1991), to help justify this project is ludicrous. It must mean there is a paucity of credible studies to reference. That study's mention of this highway (Note that it referred to an Indianapolis to Evansville interstate, not merely an Evansville to Bloomington highway.) was in an annex to the main study and was nothing more than the opinion of the main author, Mr. David Reed. Mr. Reed has been a major I-69 booster for years. There was no research done to support his opinion, and he openly admits to using atypical assumptions to support his beliefs. It is far from an unbiased and independent report, as the dEIS would have us believe.

Citing documents such as this shows a fundamental weakness in supportive literature to justify this highway. The Hudson Institute Report certainly should not be used to justify the expenditure of hundreds of millions of public dollars and the severe damage to the environment that this project requires.

*** Using simply the number of businesses as an indicator of economic trends (Figures 2, 4, and 6) can be misleading. The type, and wages of jobs would be a better indicator. For example, the Toyota plant being built near Princeton is one plant but it will employ up to 1700 workers, many with good wages.

Figure 7 is also very misleading. Many more businesses than those shown have located in SW Indiana (see Figure 2). Figure 7 shows only one category from one source--businesses assisted by the Indiana Department of Commerce. Figure 2 shows an increase of 134 businesses from 1990 -1993 in just three counties in SW Indiana. Many more would be expected in this region, especially in Monroe, Warrick, and Vanderburgh counties. Unfortunately, both of these figures show only the number of businesses, not the number or kind of jobs or wages.

*** As this dEIS acknowledges, the references on page 12 to NAFTA have no relevance to this project. The few figures given in support of NAFTA are very misleading. There is no way to predict the future of NAFTA or its infrastructure needs. To date, it can only be described as a failed treaty. The NAFTA Accountability Act, now before Congress, will point out many of the problems with NAFTA.

This another example of INDOT trying to have it both ways--they state, it is not a NAFTA highway, but the inference is that it will be a NAFTA highway.

Also, the design and construction requirements for a NAFTA, international truck route would be different than for a regular interstate, e.g., wider roadbeds, and thicker concrete. These upgrades would raise the cost considerably. The implications of this larger project must be addressed now if INDOT believes this highway will become a part of I-69.

*** On page 24 the dEIS states that this interstate would get people from southwestern Monroe County to the Monroe County airport quicker. This is a dubious assumption. The airport is in western Monroe County, and since there would be no interchanges in Monroe County except the one at SR-37, most residents would still find it quicker to use local roads. Why would anyone drive several miles west to Greene County, then south a mile or so get on the interstate, exit several miles south of Bloomington, drive north to SR-45 and then west again to the airport? This would not be quicker! The same applies to most of Greene County.

Few people use that airport anyway. That is why it has lost its federal air traffic controllers.

It is also difficult to believe there would be many benefits for the "foreign trade zone" at the Evansville Regional Airport. Or is this just a poorly disguised taunt, an attempt to label

Evansville as a foreign country? In any case, the airport is near US-41 so upgrading that highway would give not only better access to Indianapolis but also to Chicago.

Major Investment Study

The list of elements of a Major Investment Study on page 21 is not complete. A FHWA and FTA "Memorandum", 19 August 1994, subject: ""Guidance on Major Investment Studies", lists other items that should be included:

"An evaluation of the effectiveness and cost effectiveness of alternative investment or strategies in attaining local, State, and national goals and objectives." [Emphasis added.]
This was not done in this dEIS.

"Consideration of direct and indirect costs of alternatives, and factors such as mobility improvements; social, economic, and environmental effects; safety; operating efficiencies; land use and economic development, financing; and energy consumption." [Emphasis added.]
The "Alternatives Analysis" did not fully comply with these recommendations. Indirect costs were not studied, financing costs were not included, and energy consumption studies were incomplete.

"MISs should look at a full range of reasonable strategies which meet an indentified transportation purpose and need, i.e., alternatives considered should not be limited to previously indentified project proposals." [Emphasis added.]
This dEIS is clearly an attempt to justify a previously made decision. See our other comments on this matter under "Segmentation".

"The entire project described in sufficient detail (design concept and scope) must be included for conformity purposes and financial planning. After the entire project is included in the plan, phases of the project may be included in the TIP as appropriate to the schedule indicated in the plan."
The SR-37 upgrade from Bloomington to Indianapolis should have been included in this MIS.

"Final design can only be authorized when the NEPA process is completed with an FEIS/ROD or FONSI."
Letting contracts for design work, which will include elements of the final design, as is planned for this project, violates this regulation. See our comments under "Alternatives Analysis".

Many parts of this MIS were omitted in order to avoid doing the kind of thorough analysis that would have put the preferred alternative at a disadvantage with other alternatives for improving transportation in SW Indiana.

This MIS must be redone so as to include a thorough analysis of all reasonable alternatives, each given equal treatment.
*** This "Purpose and Need For Action" section fails to show that SW Indiana needs or would significantly benefit from this highway. It is more likely to exacerbate existing problems by dividing and isolating communities, taking over 3000 acres of farmland and degrading agricultural businesses, increasing traffic congestion on local roads, causing the relocation of many local businesses, and destroying and fragmenting large tracts of forest and wetlands.

*** As we have shown, the population is growing throughout the region and many areas are doing well economically. The Corridor 18 Feasibility Study pointed out (p. 7-14), that SW Indiana has a higher median income than the Nation as a whole. In general, it also has a lower cost of living.
Some areas, such as Bloomington and Greene County, are growing too fast. This is creating serious social and environmental problems in many areas. This highway could create other problems for Bloomington. As noted in the minutes of the SW Indiana Highway Coordination Meeting (Appendix P), Mr. Jeremy Weir, with the Bloomington MPO, stated that: "If SR-37 were 'closed off' due to upgrading to a totally controlled access facility a major circulation problem would exist on the west side".
As the dEIS shows (Appendix A), the counties that presumably need help the most would be the least helped by this highway. They would be put at further risk due to business relocations and suburban sprawl.
Agricultural and related businesses and communities in this region are stable and economically viable. The forests and wetlands here are valuable economic resources as well as supportive for much wildlife, flood control, and recreation. They must be protected. Their fragmentation and degradation would in no way further the economy of the region or improve the environment.
The true purpose and need of this project is for land speculators and developers who want to "open up" SW Indiana, not to improve the region but to change its nature and character to suit their narrow views of economic development. In many cases the promised jobs will be simply relocated from other areas and the economy will not be improved but merely changed, e.g., from agricultural businesses to service/retail businesses.

COMMENTS ON ECONOMIC ANALYSIS DONE IN SUPPORT OF "PURPOSE AND NEEDS" SECTION OF dEIS, INCLUDING APPENDIX A.

General Comments:

*** A major problem with this analysis is that a great amount of effort and space is given to explain the presumed benefits for the proposed highway but little attention is given to the costs. In one case the costs are even listed as "benefits" (table 2.4).

For an adequate critique, all costs must be itemized in detail, including: mitigation costs, cost of resource buyouts (coal, oil, limestone, timber, gas), maintenance and operation costs, design and engineering costs, reconstruction of existing interchanges, value of various types of land (farmland, forestland, etc.) and indirect costs, as well as construction, (including increased costs of construction in a known earthquake zone), right-of-way, and relocation costs.

The Corridor 18 Feasibility Study also included a contingency category (10% of overall costs) to cover unanticipated but expected cost overruns. This dEIS should also include this category.

Without this itemization reviewers cannot determine if all costs have been included or if the costs are accurately and realistically estimated.

Despite attempts to obtain an itemized accounting of the costs from the consultants, no such accounting was received.

*** Despite numerous statements in the main study as to the expected benefits of this highway, this analysis shows minimal benefits to SW Indiana. Most of the benefits that do accrue are to the areas that need it least. An objective analysis of this study, all the hype and glittering promises notwithstanding, does not justify the huge cost of the highway or the severe environmental and social damage it necessitates.

*** The five years allotted for the construction of this highway is unrealistically short. In written testimony to the U.S. Congress, Subcommittee on Surface Transportation, dated 20 December, 1993, INDOT Commissioner Frederick C. P'Pool estimated the construction time for this project at seven years. We consider both of these estimates to be unrealistically short.

Given the very serious environmental constraints, mitigation requirements, special construction techniques for karst terrain, building through the limestone reserves, and the large amount of public opposition to this project there will be frequent and long delays. Due to the number and extent of the problems, legal action will be taken in many areas.

Funding will also be a major problem, as frequently acknowledged by INDOT. In the above testimony to Congress, then Commissioner P'Pool wrote: "The estimated total cost of the project is $861 million ($693 million federal-aid). This is almost two years worth of Indiana's current highway federal-aid

funding. Without additional dedicated resources this project simply cannot be completed."

Upgrades to SR-37, which must be done to achieve the presumed benefits, was not addressed in this dEIS and no time schedule for completion of that project was given. Concerning funding for the SR-37 portion of the project, Commissioner P'Pool, in the above testimony to Congress wrote: "Funding sources for this project are currently unknown."

The shortened construction schedule allowed the accrual of presumed benefits to begin sooner. While this makes the economic impacts appear more positive, it is unrealistic and misleading. A 15-20 year construction schedule is more plausible.

*** For this economic analysis 18 counties in SW Indiana were divided into 5 Regions. This is not a good methodology as these region are too large and diverse. The presumed benefits within each region are shown to differ widely from county to county. To show more precisely how the presumed benefits are expected to be distributed the analysis should have been done on a county by county basis.

*** This same type of analysis done for the preferred route, with same criteria, should be performed on the US-41/I-70 corridor for comparison. Without such an analysis there is no reasonable comparison of alternative routes as require by NEPA.

SPECIFIC COMMENTS ON APPENDIX A:

1.0 Introduction

*** Figure 1-1 demonstrates a major flaw in this analysis. Study Region 5 extends to the Marion County line but the costs stop where the new highway intersects SR-37, south of Bloomington. This arrangement, which inflates benefits and omits major costs, generates a much larger Benefit/Cost Ratio than is justified. It is therefore misleading and deceptive.

*** If the ultimate goal of this project is to connect Indianapolis to Evansville with an interstate highway, as is well documented in other parts of these comments, then the US-41/I-70 route must be studied as a reasonable alternative. Also, any negative economic impacts along US-41/I-70 due to the construction of the preferred route and the resulting relocation of traffic must be included in this economic analysis.

An estimate of these impacts could be obtained from the Corridor 18 Feasibility Study (p. 4-37, 4-44, 4-45). These exhibits show that US-41, near Vincennes, will lose approximately 40% of the traffic volume it would have expected by 2015. That means it will have 8% less traffic than it currently has. This is due to diversion to the new terrain highway. Loss of this amount of traffic will cause a significant loss of customers to the businesses along that corridor. These losses must be incorporated, and itemized, in this economic analysis.

2.0 Highway User Benefits

*** The economic analysis did not address the impact of the acknowledged failure of SR-37 due to the construction of the preferred alternative from Evansville to Bloomington. The presumed benefits of this project depend upon improved travel from Evansville to Indianapolis. However, transportation between Bloomington and Indianapolis will be degraded, not improved, by the Evansville to Bloomington interstate. Therefore, all of the time savings, economic, and safety benefits must be downgraded in recognition of the anticipated serious congestion on SR-37.

*** The first sentence under "Safety Effect", Appendix A, states: "Highway safety risks in SW Indiana have been well documented." This statement is conjectural and very misleading. In fact, rural highways in many parts of SW Indiana have fewer traffic accidents and fatalities than in many other parts of Indiana.

The Indiana Factbook for 1994-95 lists the number of highway deaths in each county from 1981-1991. Marion County, with all its interstates, had over twice as many fatalities for the period as all of the counties in SW Indiana the new interstate would run through put together. Marion County, of course, has a much larger volume of traffic than any of the counties in SW Indiana. More traffic leads to more accidents and fatalities, on any given type of highway.

Vanderburgh County, one of the smallest counties in Indiana, but with lots of highways and traffic, had the greatest number of highway deaths in SW Indiana. Monroe County, which has a large and growing volume of traffic, had the second greatest number of deaths in SW Indiana. Contrary to the dEIS's assertion, Pike, Owen, and Martin Counties have low numbers of fatalities. Each of the 18 counties in the study area had less than half the number of fatalities as Vanderburgh County.

Other high traffic fatality areas are in NW Indiana where there are lots of interstates and lots of traffic and in Allen County, which is traversed by existing I-69.

If this highway brings the increase in development that its promoters promise then it will also bring increases in traffic volumes and increased accidents and fatalities. This is especially true as the local roads are hilly and winding and many have narrow shoulders. Increasing traffic on these roads will make them even more dangerous. Since this new highway will encourage people in SW Indiana to travel more, for example to larger cities to shop and gamble, the vehicle miles traveled (VMT) will increase even without an increase in population. The VMT will also increase due to the suburban sprawl that accompanies the interstates to the rural areas. This will bring an increase in traffic and congestion on local roads.

Simply comparing fatality rates among counties does not, of course, explain why these differences occur. Many demographic

factors may be involved. Also, stating that there are fewer fatalities on interstates per vehicle mile traveled may overestimate their impact on safety. Many accidents that occur close to an interstate may be related to the interstate. For example, close proximity to an interstate induces more travel on local roads as people use it to travel to more distant cities to shop, etc.. Also, high speed travel on interstates carries over to faster driving on local roads for some distance after exiting the interstate. These factors can lead to more accidents on local roads.

These increases in accidents, though they occur on local roads, are attributable to the interstate. Therefore, the safety improvements claimed for interstates may be exaggerated.

The dEIS also says there will be over 40 road closures. This means that people traveling in the area will have to go around the limited access interstate and log more miles on the local roads. This includes school buses and local business and service traffic.

If there is no increase in traffic, as this dEIS also shows, then there may be no increase in accidents, but neither will there be much economic development. You can't have it both ways, as this study tries to have it. If the economic models predict more traffic and the safety models predict less traffic then there is serious problem with the models.

The impacts of large trucks on safety are also not addressed in this dEIS. If this highway does eventually become a part of Corridor 18, as is very likely if it is built, then it will be a major international truck route. Some of these trucks may be longer combination vehicles (LCVs) which have a poor safety record and are involved in more fatal accidents. To properly inform the public of all potential impacts of this highway, this eventuality must be at least mentioned in this dEIS.

One way to increase safety in SW Indiana is to improve many of the local roads. How much of an improvement in safety, and in economic benefits, could we expect if we upgraded and repaired roads and bridges throughout the region? How much would that cost compared to this new interstate? Forkenbrock, et al., in: Transportation and Iowa's Economic Future, 1993, states: "Capacity enhancement of any given road should be balanced against the incremental benefits of applying these funds to additional 4R projects. (4R project refer to resurfacing, restoration, rehabilitation, and reconstruction.)"

A recent AAA report, America's Aging Highways and Airways, 1996, shows that 65% of Indiana's roads are in fair to poor condition. The Road Information Program, 1993, draws a similar conclusion: 68% of all local roads are in fair to poor condition. These poor road conditions contribute to accidents and added travel and maintenance costs. What impact would repairing and upgrading many of the roads in SW Indian have on the economy and traffic safety on the region? This dEIS does not make that comparison. It should do so.

Alternative modes of transportation would also ease the overload on our highways. In addition to safety concerns, cities and states that plan and build alternate modes of transportation

now will have a tremendous economic advantage in the future. This comparison study was not performed for this dEIS.

In effect, this dEIS did such a poor job of studying alternatives that we are asked to decide between this highway or no improvements at all. This does not fulfill either the spirit or the letter of NEPA.

*** The figures used in Appendix A (p. 2-8) for the safety analysis differ widely from the figures given in the main study (pp. 14, 146). Which is correct? No explanation of these differences is given anywhere in the dEIS. Since the safety improvements are given great weight not only for reducing human pain and suffering but also are a major factor in assessing a dollar value to benefits (and improving the benefit /cost ratio), this difference must be explained.

*** The first paragraph in section 2.2 assumes that interstate travel is always faster than travel on 2-lane roads. This, of course, is not always true. Congestion on interstates frequently causes long delays in traffic flow. The FHwA has projected future congestion delays for a comprehensive sample of urban freeways. Total hours of delay are expected to quadruple, from 1.25 billion in 1984 to 6.9 billion in 2005, even with the most extensive series of road improvements believed feasible. (J. A. Lindley, "Urban Freeway Congestion: Quantification of the Problem and Effectiveness of Potential Solutions," ITE Journal, vol. 57, 1987, and FHwA, "Urban and Suburban Highway Congestion", Working Paper 10, Dec. 87.)

Other 4-lane roads can also improve traffic flow and traffic on other highways can be slowed by the construction of interstates, e.g., traffic on SR-37, from Bloomington to Indianapolis, will be degraded by the presence of this highway, until SR-37 is also improved, and perhaps even if it is improved.

*** One cannot assume, as this analysis does, that building an interstate will improve the local economy through business expansion, business attraction, and higher employment, etc. I-64 through southern Indiana did little to improve many of the counties it traverses. In some areas it is creating problems due to suburban sprawl. As this dEIS acknowledges, (p. 3-1) it is also possible, and becoming more likely in a global economy, that this highway will make it easier for businesses to locate outside Indiana, e.g., in the more southern states and Mexico. This dEIS also indicates (p. 3-4), that some businesses may use this type of public subsidy to simply increase their profits, pay greater dividends to stockholders, and increase the salaries of their CEOs.

*** The exact route of the "No Build" alternative in Table 2.2 is not described. What roads were used? There are several alternative routes between Bloomington and Evansville.

The Bloomington to Evansville distances given in this table appear to be incorrect. In the main study the distance of the preferred route is given as 90-92 miles, here it is given as

128 miles. This table also shows that the no build alternative is shorter than the preferred alternative by 6.7 miles. The main study (p. IV) states that the route using existing roads is 24-26 km (approximately 15 miles) longer. Which is correct?

This is basic information. That these internal inconsistencies occur here makes any critical reviewer question much of the other information that is not so easily checked.

*** Why was the date "2022" used for Table 2.2? Why not 2009, the assigned date of completion of the highway?

This table should include the total number of miles saved, or added, and the number of miles/vehicle type (auto/truck).

*** In Table 2.4 the "Total Vehicle Operating Benefits" and "Fuel Savings Only" categories are actually costs and should be labeled as such.

*** The figure in Table 2.7 for total safety benefits ($290 million) is very different from what is derived from Tables 2.5 and 2.6 (approximately $371 million).

The "Net Change" values for "Personal Auto" and "Business Auto" in Table 2.7 are incorrect. They should read $624 and $32, respectively.

The total amount of Vehicle Operating Costs (VOC) in Table 2.7 ($49 million) is different from the amount in Table 2.4 ($69 million). Why?

The text on page 2-7 says the cumulative benefits are for the time period 2005-2034. This must be incorrect as construction is assumed to begin in 2005. It should read 2010-2034.

*** The "Methodology" section does not say whether direct and indirect losses due to relocations and loss of business on existing roads (transfer effects) are included in this analysis.

The Corridor 18 Feasibility Study, which included this highway segment, says in several places (e.g., pp. 7-9,10,11) that the economic benefits from this highway would be nearly all transfer effects for the Nation as a whole.

Forkenbrock, et. al., in Transportation and Iowa's Economic Future, 1993, state: "Transfers of economic activity from one location to another within an impact area (state, region, nation) do not constitute economic activity."

Transfer effects and relocations should be throughly studied, identified, itemized, and appropriately applied to this economic analysis.

*** In Table 3.3 no listing is made of agriculture and forest products businesses. We assume from this listing that these important regional businesses will not expand due to this highway. In fact, these important sectors of the economy in SW Indiana will suffer due to the construction of this highway.

4.0 Business Attraction Benefits

*** On page 4-2 it is correctly acknowledged that while highways

are an important consideration for some manufacturing industries other factors may be equally or more important. For example, A.C. Nelson in Investigating The Association Between Developmental Highways and Economic Development In Georgia, writes: "Several researchers find that multi-lane interstate highways in rural areas generate tourist related service employment and not manufacturing employment."

Lorin D. Kusmin, in: Factors Associated with the Growth of Local and Regional Economies, A Review of Selected Empirical Literature, 1994, writes that while some studies noted a relationship of interstates with business attraction not all did so: "On the other hand, Porterfield's study of sectoral growth (1990) finds access to interstate highways nonsignificant for 6 of 10 models estimated. Her estimates yield some evidence for a significant positive effect on growth in producer services employment, but two models suggest a significant negative effect on growth in manufacturing employment."

A U.S. Department of Transportation study: The Impact of Interstate Highway System On Non-Metropolitan Growth, 1984, states: "The results of the research showed that, while counties with Interstates, as a group, have higher average growth rates, even after confounding factors such as adjacency to metropolitan areas and urban population concentrations are controlled, the presence of a limited access highway is far from an assurance of development for an individual county. Tourist services are the industry most closely associated with Interstates, but contrary to common conceptions, manufacturing and wholesaling are not clearly associated. The Interstate System was less able to explain the spatial pattern of development than non-transportation factors."

A September 1991 report sponsored by the respected Transportation Research Board stated: "The weight of available evidence indicates that transportation policies and investments make very little difference to total employment and income in a region".

They add that new projects shift employment from one area to another, but do not create new jobs--except in areas with long-term structural unemployment. "Even then," the report concludes, "the gains are typically small."

A Brighter Future for Rural America? "Strategies for Communities and States", 1988, by John Dewitt, Sandra Batie, and Kim Norris, states: "It was found that neither location by an interstate nor adjacency was significantly related to employment growth."

*** As shown on page 4-3, no comparison to a no build alternative was done for business attraction benefits. The recent location of a Toyota manufacturing plant in Gibson County demonstrates that SW Indiana is attracting businesses without a N-S interstate and is likely to continue to do so. Upgrading US-41 would help the Toyota plant more than the preferred route for this highway.

*** Page 4-5 states that the preferred route would connect

the new Toyota plant "...with more industrialized business location areas to the north (including Regions 4 and 5...)." Region 4 is, however, more east than north of Princeton, where the plant will be located, and as stated on page 4-15, Region 4 is not an industrialized region.

*** On page 4 the suggestion is made that the study area of SW Indiana could improve its coal mining business with this highway. In fact, SW Indiana is losing coal mining business because the area is running out of coal and because its coal has a high sulfur content and therefore has less market value.

*** Table 4.3 shows that Indiana has higher manufacturing labor costs than many linkage areas, higher electricity costs than many areas, higher gas costs, and a relatively higher tax rate. These are negative factors for attracting businesses and will be so even with a new interstate. As pointed out earlier, these factors may be as important, or more important, for the economy of the region than a new interstate.

*** Page 4-15 says that Region 1, including Evansville and Gibson County have, "good accessiblity". This contradicts earlier statements in the dEIS that SW Indiana has poor accessibility.

*** Concerning Region 2, Page 4-15 says: "This region has the disadvantage of currently being served only by two-lane roads." This is incorrect. Region 2 is traversed by 4-lane, divided US-41.

*** Region 3 has a strong economic base according to the text on page 4-15. This contradicts earlier general statements that SW Indiana is doing poorly economically. Indeed, as the text points out, there is a labor shortage in this region.

*** Region 4 also has a labor shortage. Since the preferred route does not pass near this region it will be helped little or not at all. In fact, the highway may further isolate this region and divert traffic from there, e.g., US-50, with Bedford and Loogootee, will lose traffic.

*** Contrary to statements on 4-16, this highway will not improve transportation to Indianapolis or northern Indiana until SR-37 is upgraded. For most areas, it will not improve transportation between SW Indiana and Chicago. Most people, especially in the western and central parts of the region, will continue to use the more direct US-41 route. People in Monroe and Greene Counties also already have more direct routes to Chicago.

*** Page 4-14 acknowledges that workers and shoppers may be drawn from the study area to outside areas due to the new highway. However, there is no effort to quantify this loss.

*** Under "Business and Economic Development Interviews", page

4-17, it states: "Overall, the interviews confirmed a general consensus that the I-69 project is needed to help the economy of southwestern Indiana. Apparently, the authors forgot that this is not I-69. The first 50 miles of what would have been the I-69 link is left out of this study.

The same paragraph admits that Bloomington and Evansville are "not suffering economically". This is an understatement, Bloomington and Monroe County are booming!

*** Page 4-17 states that the new highway will "...make commuting easier and increase profit margins." This is a questionable assumption. It will likely increase urban sprawl and increase the amount of commuting but not necessarily make it easier. It will also increase the amount of traffic congestion within cities and along SR-37 and delay commuters there.

*** Citing "several major firms", and "a major supplier" as examples of businesses Bloomington lost (p. 4-17) is meaningless. These firms must be named or these are worthless anecdotal comments. Also, saying they didn't come to Bloomington "due to currently poor highway access" contradicts the opinion of many Bloomington businesses. For example, the survey of Bloomington area businesses: Partners in Community Business Retention and Expansion, 1994, compiled by the Indiana Gas Company, Inc. with the Bloomington Economic Development Corporation, contained the following question: "How would you rate your accessibility to the following modes of transportation?" Under the category "Truck", 82% answered "very good" or "good".

If you asked these same businesses if they would like the taxpayers to build them an interstate highway many would say of course. But that does not mean their present highway access is poor.

*** A "just-in-time" increase of 30 minutes from Evansville to Bloomington does not represent a significant increase for the entire region. The area already has "just-in-time" delivery, the new highway might just improve it by 30 minutes or less.

*** Tables 4.5 and 4.6 show that most business attraction benefits will go to Regions 1 and 5. Many fewer of these benefits will be scattered over the 9 counties of Region 2, 3, and 4. For example, only 30% of the direct business attraction jobs will go to these 9 rural counties. That averages out to only 1.2 jobs/county/year over 30 years.

Table 4.7 shows less than 40% of these benefits going to these rural counties and Table 4.8 shows only 16% and 21% of the benefits going to these counties.

These figures do not indicate significant benefits in these categories for the counties the dEIS says need help the most.

*** Table 4.7 shows Region 4 scoring well in this job attraction category. This contradicts the prediction on page 4-15 for this Region. Why this contradiction?

*** In general and in specifics this analysis claims many direct, indirect, and induced benefits from this highway, but it does not examine the expected losses resulting from the highway in the same manner. Therefore, anticipated benefits tend to be overstated and losses to existing businesses understated.

5.0 Tourism Benefits

*** Tourist access to the region will be only marginally improved because SR-37 will become congested. Travel time savings will be lost on this major corridor to the region.

*** As the study points out, many roads in SW Indiana are winding, hilly and narrow. With a large increase in tourist traffic these roads will quickly become congested and make them more dangerous, causing more accidents and fatalities.

*** Table 5.5 shows the rural counties of SW Indiana (Regions 2, 3, 4) gaining only 13% of the increases in tourism predicted from the construction of this highway. That is an average increase of only 8 visits/county/day.

Tables 5.7 and 5.8 show Regions 2, 3, and 4, receiving only 10% of the disposable income and sales increases due to increased tourism.

Table 5.9 shows Regions 2, 3, and 4, receiving only 11% of the job increases from tourism. This averages out to around 0.44 jobs/county/year for these rural counties.

While the entire region gains 1073 jobs the rest of the state loses 489. The overall increase in jobs for SW Indiana is only 2 jobs/county/year. As noted on page 5-17 most of these tourism related jobs are in service/retail businesses--part-time, low wage postions.

*** The Aztar Casino may bring many tourists to Evansville but it may also draw tourists from other parts of SW Indiana. There are only so many tourist dollars to go around.

An analysis of the overall impacts of gambling should be done for this study. Gambling is associated with many negative social and the economic impacts: addiction, relocation of tourism benefits, traffic congestion, increased need for social and public safety services. If more people will travel to Evansville to gamble because of the easier access from this highway then these increased social costs should also be calculated and included in this study.

*** Note that there are no tourist attractions listed for Region 4. Does this indicate there will be few benefits to that region from tourism? Tourism to Region 4 may decline as other areas

become more accessible from the new highway.

*** Amish farms will be split by the new highway making them less attractive to tourists. Who wants to visit a farm where people practice a simpler, quieter lifestye and listen to semis roar by?
*** Page 5-9 implies that there is a need to improve access to Lake Monroe. That is not necessary. Lake Monroe is already overused and crowded. Bringing in more tourists will compound the congestion on local roads, increase already overcrowding on the Lake, and decrease the quality of recreation.
Bloomington does not actively promote increased use of the Lake Monroe. Therefore, increasing use of the Lake should not be used to justify this highway.

*** Overall, the economic impacts from tourism will be minimal, as this study clearly shows. Many of the benefits are relocation impacts; they will be increases for the region but losses to the rest of the state. Also, some parts of SW Indiana will see increases in tourism but at a loss to other parts of SW Indiana. Most of the jobs will be in the service/retail sector.

6.0 Overall Benefit-Cost Assessment

*** The text on page 6-1 states that the operation and maintenance cost are included in the overall cost figure. Unfortunately, these costs are not itemized or quantified. We question whether these costs, estimated at $5.4 million/year by the Corridor 18 Fesibility Study, were actually included in the costs for this project. This level of detail is important for an adequate critique of the study.

*** On page 6-3 it states that: "...no potential benefits derived from operation of segments of the road prior to completion of the entire project were included in the analysis." It also states that no construction costs were included in the benefits stream. These statements seem to conflict with statements on page 2-7, and Tables 3.2 and 6.1, all of which indicate benefits start in 2005, the same year construction begins.

*** The "Benefits by Region" section makes clear that most benefits go to Regions 1 and 5, the Bloomington-Martinsville and Evansville areas. It helps least those counties that this study claims need help the most--Pike, Daviess, and Greene Counties.

*** The cost analysis part of this study is very poorly defined, omits important details, and is incomplete. For Example:

a) What are the itemized figures for operation and maintenance?

b) Are environmental mitigation costs estimated?

c) Are the costs of mineral buyouts included, limestone (estimated value of over $300 million for limestone, p. 217), coal, oil, gas?
d) What is the value of the timber? We believe that all trees, regardless of size when taken, should be compensated at their mature market value.

e) The land acquisition costs are out of date. Land values have risen sharply since the estimates for this study, especially in Monroe and Greene Counties. Costs should also be itemized by county and land type.

f) The entire route of the highway is now considered to be in a moderate to severe earthquake zone (D.L. Eggert, et.al., 1994, Seismic Hazards In Indiana: What Have We Learned, and Patrick and Cheryl Munson, 1996, Paleoliquifaction Evidence For Recurrent Strong Earthquakes Since 20,000 Years BP In The Wabash Valley Area Of Indiana.
On the basis of current evidence, reclassification of earthquake zones in SW Indiana is now under review. The requirements for construction in an earthquake zone will likely be extended in this area. This will add to the cost of construction

g) Relocation cost estimates are out of date.

h) Are design and engineering costs included? In INDOT's testimony to the U.S. Congress, cited above, these costs were put at $46.6 million.

i) Were the costs for reconstructing the interchange of the new highway with I-64 included?

*** No sensitivity analysis was performed for the Benefit/Cost Ratio. This information helps to evaluate the depth and reliability of the study. Simply saying that a large B/C ratio obviates the need for such an analysis is not sufficient reason to omit it. Since major costs were omitted it is very likely that the true B/C ratio is less than given here.
A sensitivity analysis was done for both the Corridor 18 Feasibility Study and the Donohue, et. al. Study. The Donohue, et al., Study (p. 10.2) says a sensitivity analysis is an "established principle" of Benefit/Cost analyses.
We would have performed such an analysis ourselves but this dEIS does not give sufficient information to do so. This is another example where this dEIS does not give sufficient information for an adequate review by citizens.
For a summary of omitted costs (estimates), and their impact on the Benefit/Cost Ratio, see the end of this section.

*** Advocacy statements and hype notwithstanding, this study suggests a poor return on investment for this project. Since a similar study was not performed on alternatives, there is

a clear bias in favor of this project.

It would be very instructive to see a Benefit/Cost ratio, calculated in the same way as for the preferred alternative, done on the US-41/I-70 alternative. As mentioned in the Donohue at. al. Study: **"We would also like to point out that the real value of benefit/cost ratios lies in their usefulness in selecting among competing alternatives, not in their absolute value."**

COMMENTS ON THE ECONOMIC ANALYSIS IN THE MAIN PART OF THIS DEIS:

*** Table 1 is misleading. The Donohue et. al. Study was for an Indianapolis to Evansville Highway. This is important to know in interpreting that study. It was not for a Bloomington to Evansville Highway. Also, this table gives the Benefit/Cost ratio as 1.23 - 1.54. The 1.54 ratio was, as explained in that study, for a set of highly unrealistic assumptions.

It is important to note that the Donohue et. al. Study did not recommend construction of any of the Indianapolis to Evansville Highway alternatives it studied (Chapter 15).

Ignoring the above types of information is deceptive and shows a willingness to distort data to favor the preferred alternative.

*** Table 2 shows significant losses of traffic on regional roads, yet there is no mention of the impact of these losses on local businesses. Impacts on US-50 and SR-37 south of Bloomington should also be included in this analysis.

*** Table 2 shows traffic volumes on SR-57 from SR-64 to US-50 dropping from present counts with the new highway, yet the level of service also drops. The same occurs on US-231 from US-50 to SR-54. According to Table 3a these changes in LOS are incorrect.

*** Without the new highway only two sections of 231 will fail by 2020 (Table 2) not "several", as the text states.

*** Paragraph 6 on page 12 is self-contradictory. The first sentence says the preferred route will enhance economic development potential for SW Indiana, but sentence three says upgrading US-41 to a freeway will only help Gibson County. Why is it that upgrading US-41 will only help the counties it traverses but using the preferred route will help all of SW Indiana? There is a serious bias here in favor of the new terrain alternative.

--- The significance of Figure 7 is impossible to evaluate. What kinds of businesses are these? How many employees do they represent, and what are their wages? Many appear to be 10 miles or more from an interstate, but it is impossible to tell without a scale.

We also question its validity since it shows Monroe County with only one new business from 1992-93, a time period when

this county was growing very rapidly. All of Vanderburgh County also shows only one business. We question if this truly represents the business growth in SW Indiana. What percent of the total new businesses in Indiana were assisted by the Indiana Department of Commerce?

--- Table 41 apparently uses non-discounted figures. These numbers vary widely from those in Appendix A. As explained in the appendix, undiscounted numbers can be misleading. There should at least be a notation stating that these numbers are not discounted.

OMITTED COSTS IN DEIS, INDIANAPOLIS TO EVANSVILLE PROJECT:

Costs are in millions of dollars. All estimates of known omitted costs are very conservative.

Operation & Maintenance °	$95.0
Timber *	5.4
Design & Engineering #	46.6
SR 37 upgrade +	300.0
Mineral Resources	
Limestone (20% of $300 million)	60.0
Coal	?
Oil	?
Gas	?
Upgrade of interchange at I-64	?
Environmental Mitigation (including additional acreage to replace lost forestland and wetlands)	?
Increased costs for karst & earthquake areas	?
Realistic aquisition & relocation costs	?
Total of known omitted costs	507.0
Cost estimate in dEIS	730.0
Total	$1,237.0

This total figure is close to the cost estimate given in the Corridor 18 Feasibility Study for the Indianapolis to Evansville segment of the Indianpolis to Houston project ($1.02 billion).

Since the economic analysis already includes benefits up to Marion County, few additional benefits would be expected from connecting the highway to I-465. There will, of course, be considerable costs to improving the interchange at I-465.

It is apparent that these omitted costs will change the benefit/cost ratio dramatically.

° $2.6 = Bernardin-Locmueller & Assoc. estimate; 5.0 = Corridor 18 Feasibility Study, estimate. Value used here is an average of the two, per year, over 25 years.

* This number from estimates given in our comments.

From INDOT testimony to U.S. Congress.

+ Derived from Donohue et al., Study, Corridor 18 Feasibility Study, and this dEIS.

SEGMENTATION

This dEIS improperly attempts to isolate the SW Indiana Highway Corridor, Bloomington to Evansville, as a stand alone project. As will be documented in our following comments, this Bloomington to Evansville Highway is only a part of a larger, longstanding plan to connect the cities of Indianapolis and Evansville with another interstate highway.

Such "segmentation" is a clear violation of NEPA. See City of Rochester v. United States Postal Service, 541 F.2d967(2d Cir. 1976).

Courts have often held that such segmentation violates NEPA. See, e.g. Swain vs Brinegar, 542 F. 2d 364 (7th Circuit 1976) (en banc).

The US Department of Transportation has established guidelines to follow in preparing an EIS for a transportation project. Regulation at CFR 23 771.113 speaks to the question of "segmentation" and its avoidance:

> "Segmentation could also entail separate development by the applicant of an entire portion of a project, e.g., a segment of highway or transit guideway that should be considered as part of a larger project for which Federal assistance is being sought."

* * * * * * * * * * * * *

Following is a partial list of documents that identify this project as an Indianapolis to Evansville Highway, with Bloomington to Evansville being but one segment of the larger project:

A press release from INDOT, dated Monday, December 3, 1990, entitled; "Evansville -to- Indianapolis Highway", contains the following:

> "INDOT to hold information meeting on Bloomington -to- Newberry Segment"
> "We hope to address peoples's concerns and answer their questions about our work on Indianapolis -to- Evansville highway corridor studies, said Phil Schermerhorn, chief of INDOT's Public Affairs Division."

The press release ends with the following sentence:

> "This will be the first of several public meetings to be held concerning the corridor studies between Evansville and Indianapolis."

Following is an excerpt from a letter to Mr. Brian Hasler, Executive Assistant for Economic Development, in then Congressman McCloskey's office, dated 28 Feb. 1991. The letter is a series of questions and answers concerning the "Indianapolis to

Evansville Highway". Responses to the questions were given by Dennis E. Faulkenberg, Chief, Division of Policy and Budget, INDOT.

Question #6: "When and by whom was the decision made for this particular route[?]":

Answer: "The route from Indianapolis to Evansville was the recommended route in the federally mandated feasibility study performed by Donohue and Associates on the behalf of INDOT in 1989."

Question #8: "Is anything going to be done to improve Highway 37 between Bloomington and Indianapolis?"

Answer: "Because that section of the Evansville to Indianapolis route is already constructed to fairly high standards, it is not our area of concentration at this time. It is however, in the overall scheme of the project, planned to be improved should an interstate standard route be constructed."

A letter from Mr. Arthur Fendrick, Division Administrator, Federal Highway Administration to Mrs. Katherine Lyon Davis, Deputy Commissioner, Development, Indiana Department of Transportation, dated April 14, 1992, includes the following:

> "Subject: Project F-031-4(11)
> Southwest Indiana Highway Corridor:
> Sections II & III Environmental Overview
>
> "1. The Intermodal Surface Transportation Efficiency Act of 1990 (ISTEA) specifically identifies this corridor as an extension of I-69."

A letter dated August, 1991, from Michael MacMullin (for Thomas Jackson), U.S. EPA, to Mr. Robert Hittle, of D.E. McGillem & Associates, begins: "This is in response to your letter of June 27, 1991 requesting our scoping comments on a proposed highway project to provide improved access between Indianapolis and Evansville, Indiana. This program is generally known as the Southwest Indiana Highway Corridor." [Emphasis added] In this dEIS the project is referred to as the "Southwest Indiana Highway Corridor".

INDOT Professional Services Bulletin - 1992 - No. 13, dated October 9, 1992, states, Under "Item #1" entitled: "Environmental Impact Documentation--Proposed Evansville to Indianapolis Interstate Route I-69 Extension":

> "Numerous studies were performed in previous years in a search to improve the accessibility of the southwest quadrant of the state. The emphasis was

> to find a logical link between two of Indiana's major cities, Evansville and Indianapolis. A decision was made by the department in 1990 to initiate an investigation to determine the best route location for the newly proposed Interstate Route 69 extension."

Bernardin, Lochmueller & Associates, Inc., of Evansville, Indiana, submitted a proposal in response to the above cited PSB. Their response, dated November 6, 1992, was entitled: "Proposal to Provide Environmental Documentation on the Proposed Evansville to Indianapolis Interstate Route I-69 Extension" Their response is addressed to Ms. Harriet Briggs, Program Coordinator, Consulting Services Unit, INDOT. It begins:

> "Dear Ms. Briggs:
>
> Bernardin, Lochmueller and Associates, Inc. is submitting this proposal and supporting documentation to express our interest in providing environmental services in completion of an Environmental Impact Statement on the Proposed Evansville to Indianapolis Interstate Route I-69 Extension. Professional services to complete the corridor route location and associated environmental studies would include collecting all necessary data, generation/refining alternative alignments with the corridor, conducting appropriate public meetings, preparing a draft environmental impact statement based upon the preferred alignment, and publishing an executive summary of the project. The anticipated completion date is September 1, 1995."

In the dEIS itself several references, citations, and much information in support of this project, pertain not merely to an Evansville to Bloomington Highway but rather to an Evansville to Indianapolis Highway. For example, the Donohue et. al. Study, the Hudson Institute Study, all of the public meetings held by INDOT for this project (p. 21), and the Corridor 18 Feasibility Study.

The title page of an earlier draft EIS for the Bloomington to Newberry segment of this highway (published in 1992) reads:

> "Indianapolis to Evansville Highway
> Section 1 - Bloomington to Newberry"

Much of the supporting data for this current dEIS is exactly the same as given in the earlier dEIS for the Bloomington to Newberry segment. The only difference is the notation was changed from "Indianapolis to Evansville" in the earlier version to "Southwest Indiana Highway Corridor" in this draft.

As the one example given above makes clear (INDOT Press Release), INDOT consistently and over many years has referred to this project in its public meetings as an Indianapolis to

Evansville highway, with various arbitrarily defined segments.

The Hudson Institute Study states: "Simply put, we believe that a high-speed highway must be built linking Marion and Vanderburgh counties."

The Corridor 18 Feasibility Study states: "In this legislation (ISTEA) Corridor 18 was defined as extending from Indianapolis, Indiana to Memphis, Tennessee, via Evansville, Indiana. Subsequent legislation in 1993 amended this definition to extend the corridor from Memphis, Tennessee to Houston, Texas, via Shreveport-Bossier City, Louisiana. This feasibility study specifically addressed the Indianapolis/Evansville/Memphis/ Shreveport-Bossier City/Houston definition of Corridor 18."

Indeed, the first page of the dEIS states that "Corridor A" as defined by the Donohue Study, was selected for further study and that, "this further study was to prepare an environmental impact statement for the proposed corridor". The Donohue Study's Corridor A is an Indianapolis to Evansville Highway.

In chapter 8 of the dEIS, "Comments and Coordination", many of the respondents referenced their comments to an Indianapolis to Evansville Highway. (See pp. 229, 248, 263, 268, 273, 278, 279, 281, 284, 286, and 289.)

Also, coordination statements were taken not only from the MPOs of Bloomington and Evansville but also from the Indianapolis MPO. This would imply that Indianapolis is an integral part of this project.

This dEIS states that SR-37 from Bloomington to Indianapolis will fail over much of its length if it is connected to an interstate at Bloomington and nothing is done to improve SR-37. This demonstrates that SR-37 is a logical and important part of this highway proposal and must be upgraded for the Bloomington to Evansville link to achieve its intended purposes. To plan a highway that will cause an existing major artery to fail is poor public policy, poor planning, and a waste of tax dollars. INDOT cannot assume that money will be there to upgrade SR-37 when necessary. It must, therefore, be included as a necessary part of the whole project and included in the final EIS.

The Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991 mandates that the state planning process consider "preservation of right-of-way" for construction of future transportation projects...and identify those corridors for which action is most needed to prevent destruction or loss" (3 sec 1025(a). The Corridor 18 Feasibility Study outlines the purposes of corridor preservation and several methods of achieving it (pp. 9-10, 9-11).

Due to the current and continuing rapid rate of development along SR-37, it is possible that upgrades to this existing highway may not be feasible when it becomes necessary. In that

case, a new terrain route would be necessary. What is the anticipated cost and environmental problems in that eventuality? Are any measures being taken now to preserve this corridor by restricting further development and road cuts along SR-37 to prevent the necessity of using new terrain in the future?

In the cost analysis (Appendix A), Region 5 in the study area includes Morgan County and extends to the Marion County line. At this point it is closer to Indianapolis than the southern terminus, in Warrick County, is to Evansville. The highway does not enter Vanderburgh County. Yet, Evansville and Vanderburgh County are included in the study region for the dEIS but Indianapolis and Marion County are not. This defies logic.

If this is only a Bloomington to Evansville Highway then the economic analysis is invalid as it includes benefits up to Marion County but costs only to the southern edge of Bloomington. Since SR-37 will fail unless SR-37 is upgraded these benefits are improperly accrued. If SR-37 is to be used for this project, then the cost of upgrading it to make it useful must be included in this dEIS.

On page 151 INDOT acknowledges the need to upgrade the intersections on the west side of Bloomington on SR-37 at Tapp Road, Vernal Pike, and SR-45/46, even though the project technically ends south of these intersections. No cost figures and no details of the improvements were given. By indicating the need to upgrade this section of the route INDOT has acknowledged that this is an important part of the entire project and has de facto included it in the project, but with no cost estimates.

On 14 April, 1993, our organization, Citizens for Appropriate Rural Roads (CARR) sent an Open Records Act Request to INDOT. Item #6 of our request reads: "Documentation of any and all plans for upgrading State Road 37 as part of the Indianapolis to Evansville Highway proposal. Please include proposed, completed, or current design and/or engineering studies, environmental studies, feasibility studies, or any other studies done for, related to, or that might be incorporated or used for, upgrades to SR-37. Also include the minutes of any meetings where such upgrades were discussed."

INDOT's response to our request, signed by Chief Council John Jordan, reads:

"6. Construction of the following projects is complete:

A. SR 45 & SR 37 Interchange
B. SR 48 & SR 37 Interchange

Another project which is currently being designed is the relocation of SR 46 from Ellettsville to SR 37, which will include a new interchange at SR 37.

"Access Control Options for State Road 37 in Monroe County",

dated August 1991, prepared by Steven C. Wuertz."

These responses show clearly that not only is SR-37 an integral part of this project, but also, plans do exist to upgrade it, and money has been spent on upgrading it, as a part of an "Indianapolis to Evansville" project. This contradicts INDOT's assertions in this dEIS that upgrading SR-37 from Bloomington to Indianapolis is a separate project.

These statements by INDOT also speak to the question of studying reasonable alternatives for this dEIS. Also, since money has been spent on these interchanges, and they are named as part of the project, was the cost of these interchanges included in the cost of the Bloomington to Evansville project?

This dEIS states that SR-37 from Bloomington to Indianapolis will fail over much of its length if it is connected to an interstate at Bloomington and nothing is done to improve SR-37. This demonstrates that SR-37 is a logical and important part of this highway proposal and must be upgraded for the Bloomington to Evansville link to achieve its intended purposes.

Statements given above clearly show that INDOT has long considered this project to be an Indianapolis to Evansville Highway. Indeed, to plan a highway that will cause an existing major artery to fail is poor public policy, poor planning, and a waste of tax dollars.

INDOT cannot assume that money will be there to upgrade SR-37 as a stand alone project. It must, therefore, be included as a necessary part of the whole project and studied as such for this EIS.

*** The SR-37 Bloomington to Indianapolis segment of this project was recently purged for two main reasons: 1)Its exclusion lowers considerably the overall cost of the project thereby improving the benefit/cost ratio used to justify it. 2) By omitting this segment INDOT hopes to avoid studying the US-41/I-70 route as a reasonable alternative to their new terrain preferred route.

It is widely understood by INDOT officials, government officials, and the public that the goal of this project is, and always has been, to connect Indianapolis with Evansville with an interstate highway. This belief has been historically and consistently encouraged by INDOT itself at its numerous public meetings. Many newspaper articles, in papers from Indianapolis to Evansville, over a five-and-a-half-year period, have referred to this project as an Indianapolis to Evansville Highway.

A Bloomington to Evansville Interstate has very different costs, environmental and social impacts, and potential benefits than an Indianapolis to Evansville Interstate. Public and offical comments on the two projects would be expected to be very different.

Failure to include SR-37 from Bloomington to Indianapolis, with all its costs and impacts, as an intergral part of this dEIS, is illogical, deceptive, and a violation of NEPA.

ALTERNATIVES ANALYSIS:

The Council on Environmental Quality regulations at 40 CFR 1502.14, concerning alternatives to proposed action, states:

> "This section is the heart of the enviromental impact statement.
> In this section agencies shall:
> (a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly dicuss the reasons for their having been eliminated.
> (b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.
> (c) Include reasonable alternatives not within the jurisdiction of the lead agency.
> (d) Include the alternative of no action."

The U.S. Department of Transportation also has established guidelines to follow in preparing an EIS for transportation projects. These guidelines mandate a good discussion of alternatives. Regulation at 49 CFR 520 (3)(d) and (e) discuss alternatives:

> (d) A rigorous exploration and an objective evaluation of the environmental impacts of all reasonable alternative actions, particularly those that might enhance environmental quality or avoid some or all of the adverse environmental effects, are essential. Sufficient analysis of such alternatives and their environmental benefits, costs, and risks should accompany the proposed action through the review process in order not to foreclose prematurely options which might enhance environmental quality or have less detrimental effects. Examples of such alternatives include: The alternative of not taking any action or of postponing action pending further study; alternatives requiring actions of a significantly different nature which would provide similar benefits with different environmental impacts, e.g. low capital intensive improvements, mass transit alternatives to highway construction; alternatives related to different locations or designs or details of the proposed action which would present different environmental impacts. In each case, the analysis should be sufficiently detailed to reveal comparative evaluations of the environmental benefits, costs, and risks of the proposed action and each reasonable alternative. Where an existing impact statement already contains such an analysis its treatment of alternatives may be incorporated, provided such treatment is current and relevant to the precise

purpose of the proposed action.

(e) "...included for purposes of contrast should be a clear statement of how all adverse effects will be mitigated."

*** As we note in our comments on segmentation, by changing the scope of this project from Indianpolis to Evansville to Bloomington to Evansville, INDOT hopes to avoid studying the US-41/I-70 corridor as an alternative to their preferred route. However, if the underlying intent of this project is to connect Evansville to Indianapolis with an interstate highway then the US-41/I-70 corridor is clearly a reasonable alternative to the much more environmentally damaging new terrain route.

THE US-41 CORRIDOR IS A REASONABLE ALTERNATIVE FOR THE FOLLOWING REASONS:

1) As it uses existing roadways, the US-41/I-70 alternative would have very significantly fewer environmental problems.

2) The US-41/I-70 alternative would cost significantly less than the new terrain route. Estimates of the cost difference can be obtained from the Donohue, et. al. Study, (1990), and the Corridor 18 Feasibility Study, (1995). The Donohue Study estimated the cost of an Indianapolis to Evansville highway, via Bloomington and using SR-37, at $790 million (table 4.6, 1989 dollars). Of the $790 million, $567 million was for the Evansville-Bloomington segment, and $223 million for upgrading SR-37 from Bloomington to Indianapolis. The cost of the Evansville-Bloomington segment is now put at $730 million by this dEIS. If the cost of the SR-37 link is increased at the same ratio it would now cost $290 million. The Corridor 18 Study (p. 3.26) estimates the cost of the SR-37 link at $250 million.

Adding the current costs of the two segments, as derived from the Donohue Study, would put the total cost at $1.02 billion. This is the same estimate given in the Corridor 18 Study for an Indianapolis to Evansville interstate.

The Donohue Study estimated the cost of upgrading SR-41 at $219 million (table 2.9, 1989 dollars). If the cost of these upgrades were increased at the same ratio as the SR-37 upgrades the current cost would be $285 million. Adding the cost of a bypass around Terre Haute (already being planned) would put the cost at just over $300 million. This is approximately the cost of the SR-37 upgrade alone.

The entire cost of the US-41/I-70 Indianapolis to Evansville route would be approximately 40% of the cost of just an Evansville to Bloomington route, and one-third the cost of the entire Evansville to Indianapolis route via Bloomington.

3) The US-41/I-70 route would confer presumed economic benefits on SW Indiana similar to the new terrain preferred route.

For approximately one-half of the distance from Evansville

to Terre Haute, US-41 parallels and is within 20 miles of the preferred route. US-41 runs through Vanderburgh, Gibson, and Knox counties, and would be closer to many parts of Greene County than the preferred route. Pike and Daviess counties have easy access to US-41 on US-50 and SR-64. Pike County now has easy access to I-64.

The Southwind Maritime Center at Mt. Vernon, which the dEIS seems to think is so important, is closer to US-41 than it would be to the preferred route. Using the US-41 route would also give this port better access to Chicago.

For the above reasons the US-41/I-70 route is a reasonable alternative to the preferred route and must be rigorously studied and included in the final EIS.

*** The dEIS is unclear as to just how important close access to an interstate is for economic development. On p. 12, for example, the statement is made that all of SW Indiana would benefit from a new interstate, but in the same paragraph it says that the US-41/I-70 alternative would not help Pike, Daviess, or Greene Counties. Which is the the more reliable statement?

If the US-41/I-70 route would only help the counties it runs through, then, by similar reasoning, the preferred route will only help the counties it runs through. This means taxpayers are spending $730 million to help five counties, two of which even this dEIS admits are already doing well.

Using INDOT'S narrow reasoning also means that using their preferred route would certainly not help all of the 18 counties listed in the economic analysis. The dEIS makes no attempt to explain this contradiction.

*** NEPA requires that other transportation options must be throughly studied as alternatives to the preferred option (paragraph 1, this section). Unfortunately, consideration of the Transportation Systems Management (TSM) alternative was woefully inadequate. To dismiss it on the basis of the Hudson Institute Report is a joke. As stated elsewhere in these comments, the Hudson Institute Report was not a serious transportation study. To dismiss the TSM option as not able to improve travel time between Evansville and Bloomington is simply wrong.

Rail lines now exist connecting Indianapolis, Bloomington, and Evansville. Upgrading rail alternatives for improving transportation in SW Indiana must also be studied.

In general, a much more serious, in-depth study of the TSM alternative must be done for the final EIS. Failure to address this option in this dEIS is another example of prejudicial bias in favor of highways in general and the preferred alternative in particular.

*** In several places in this dEIS 4-lane highways are indicated as being sufficient to improve economic potential. Indeed, lack of a 4-lane, not necessarily an interstate, is stated as being

the problem in parts of SW Indiana. If this is the case then why wasn't a 4-lane road with at-grade intersections studies as an alternative to a new terrain interstate? Several options using existing roads are available: SR-57/67, SR-37/US-50/SR-57, and US-231, among others.

The "Upgrading Existing Highways" alternative in this dEIS is a ridiculous proposal that no one advocates. Creating an interstate on existing two-lane roadways is obviously fraught with problems. This alternative is merely a straw route put in to make the preferred route look good by comparison, and to fulfill NEPA's requirement to study alternatives. Even this proposal, as described in the dEIS is flawed because it does not use all existing roads but relies on significant new terrain.

*** 40 CFR at 1502.2 states:

"(f) Agencies shall not commit resources prejudicing selection of alternatives before making a final decision."

"(g) Environmental impact statements shall serve as the means of assessing the environmental impact of proposed actions, rather than justify decisions already made."

40 CFR at 1502.14(d) states that in this section agencies shall:

"Include the alternative of no action."

40 CFR at 1506.1 "Limitations on actions during NEPA process" states:

"(a) Until an agency issues a record of decision as provided in 1505.2, no action concerning the proposal shall be taken which would:

(2) Limit the choice of reasonable alternatives."

The Federal Register, Vol. 52 No. 167, August 28, 1987, "Environmental Impacts and Related Procedures; Final Rule", by the Federal Highway Administration and Urban Mass Transit Administration, page 32649, speaks to the performance of design work before a Record of Decision is completed:

"However, the administration recognizes the need to proceed with detailed design activities where such work is necessary to permit the full evaluation of environmental impacts and to permit the consideration of apprpopriate mitigation measures,.... The regulation provides for those situations by allowing the applicant to complete all necessary design work needed to complete the EIS or to comply with other environmental laws during the NEPA process. **This should not be construed as an authorization to proceed with final design for the entire project, but only for those aspects of the project necessary to consider specific environmental concerns."** [CARR's emphasis]

On 29 May, 1996, in the middle of the public hearings for this dEIS, INDOT published "Professional Services Bulletin - 1996 - No. 7", calling for bids for design plans for a large

segment of the highway that is under review in this dEIS. This segment extends from just north of I-64 to Washington, Indiana. This call for design work also selected one of the options under review to bypass the city of Washington. The document stated: "It is anticipated that the selections will be completed by July 26, 1996. Note that the comment period for this dEIS is not over until August 1, 1996.

The scope of the work called for in this document clearly goes beyond what is required to "consider specific environmental concerns" to complete this EIS. This bulletin assumes this alternative will be selected and that one of the options under consideration to bypass Washington has already been chosen.

Our concerns on this matter were presented in a letter to Governor Bayh in June of this year and a copy sent to INDOT Commissioner Stan Smith, as well as to Federal Highway Administration officials. This letter is included as additional comments at the end of this section. To date, we have received no response to our concerns.

NEPA's requirement for a "no build" alternative has been effectively ignored in this dEIS. Although such an alternative was briefly mentioned and summarily dismissed, the intent of NEPA was subverted by INDOT's advertisement for bids for design work on their preferred route. If bids are let before the EIS process is completed, as this document states they will be, then there cannot be a "no build" alternative.

This document is also clear evidence that other alternatives are not being considered in this EIS. Indeed, as we have noted in several places in our comments, this EIS is merely an attempt to justify a decision that has already been made: to construct this highway on this specific route.

This blatantly irregular, and possibly illegal, action shows a disregard for the NEPA process. It is also telling citizens who took the time to come to the hearings, and who are prepared comments, that they have wasted their time and effort. It is apparent to all that the public hearings for this project were nothing more than a public charade-- a formal obligation which INDOT holds in contempt.

*** Page 26 states: "At the present time, the major highways serving this corridor are SR 57, SR 45, and SR 54." This list is obviously incomplete. Why were US-231, US-41, I-64, US-50, and SR-37 to US-50, not included? The dEIS also failed to recognize that US-41, US-231, and US-50 are also in the National Highway System.

It is clear from the above comments that reasonable alternatives to INDOT's preferred alternative, including the no build alternative, were not rigorously studied or seriously considered in this dEIS. This dEIS therefore fails to fulfill a basic requirement of NEPA.

It is important to point out that many of the impacts that INDOT hoped to avoid are also present on the preferred route.

Simply pointing out that INDOT could have chosen a more destructive route doesn't make the preferred route any better. Stating that they are being careful does not mean that INDOT has avoided serious problems. Some of the discarded alternatives were actually "straw routes"; they were never seriously considered, were eliminated years ago, and were designed and included to make the preferred route appear better by comparison.

3 June 1996

Dear Governor Bayh:

It has come to our attention that on the 29th of May, 1996, the Indiana Department of Transportation (INDOT) published a Professional Services Bulletin (PSB) calling for bids for design and engineering work for the proposed Bloomington to Evansville interstate highway. As you know, public hearings and the comment period for the draft Environmental Impact Statement (dEIS) for this same project are currently underway.

This blatantly irregular, and possibly illegal action shows a disregard for the regulations of the National Environmental Policy Act (NEPA), contempt for public involvement, and distain for the democratic process. Since the PSB calls for design and engineering work on the entire segment of the highway from near I-64 to Washington it cannot be considered merely as information necessary for completion of the dEIS. Rather, it is an improper advancement of the entire project prior to the completion of the NEPA process.

It has been made very clear at the public hearings that the dEIS itself is seriously flawed and will require major revisions. The EIS process also requires consideration of reasonable alternatives to the preferred route as well as the "no action" alternative. And it requires that the input of citizens and official agencies be given serious consideration in the choice of a final route. Your premature action ignores these requirements. Your decision to jump ahead of the normal process assumes the highway will not only be built but will be built on a predetermined route of your choosing, in spite of all objections.

As you know, there is serious and widespread opposition to this expensive and destructive project. This opposition was clear and outspoken at the first three public hearings for this highway. This call for design and engineering work in the middle of the EIS process is a slap in the face of every citizen, for or against this project, who believes in a meaningful democratic process. You are telling citizens, who took the time to come to the hearings and who are preparing comments that they have wasted their time and effort. It is now apparent to everyone that the public hearings for this project are nothing more than a public charade. Why is the state of Indiana wasting our tax dollars on these hearings, and deceiving its citizens into believing their input will have any impact on this project?

This whole scheme is an attempt to demoralize the opposition and cut them out of a legally established process. Politicians, in collusion with special interests, have once again denied average citizens their proper role in government. It it any wonder that people are dissillutioned, frustrated, and angry with their cynical political representatives?

Since you have direct control of INDOT, an action of this importance could not have been made without your knowledge and approval. We therefore request that you ask INDOT to withdraw the PSB for this work. We also call for a prohibition on the expenditure of any money for design and engineering work until the EIS process is completed. Our organizations will pursue all legal and administrative means to assure that the spirit as well as the letter of NEPA is fulfilled. Ignoring citizens' input, as well as official comments, will deny the people of Indiana a voice in a project that will profoundly affect their lives, communities and properties. We ask that you not allow this undemocratic process to continue.

We would appreciate the courtesy of a prompt reply to our concerns. Citizens throughout Indiana need to know that proper and legally established procedures will be followed and that their input is important.

Sincerely yours,

Thomas R. Tokarski

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cc: Stan Smith INDOT, Commisioner
Federal, state and local Indiana legislators
Federal Highway Administration
Carol Browner, US EPA
EPA Region V Office
Federico Pena, U.S. Dept. of Transportation,

INDIRECT IMPACTS

*** NEPA regulations (40 CFR 1502.16 (b), and (h)) dictate that indirect, as well as direct, impacts, their significance, and means to mitigate adverse impacts, must be discussed in the dEIS.

*** This dEIS's analysis of indirect impacts of this project is woefully inadequate. As a result, there is no discussion of measures to mitigate these impacts.

The dEIS's attempt to downplay these impacts results in data that contradicts their attempts to promote the highway as a tool for economic development.

*** Despite INDOT's efforts to ignore indirect impacts, it is well known that sprawled commercial and residential development are a frequent by-product of interstate highway expansion. This sprawl will in turn have a broad spectrum of environmental and social impacts: loss of more wetlands, forest land, and farmland, increased flood risks, degradation of water quality, traffic congestion, increased energy use, increases in accidents, and increases in property taxes.

*** Table 44, page 149, is confusing. Is this chart predicting 14 gas stations and 13 motels for the one interchange at SR-37? This seems very unlikely. Meanwhile, only one subdivision is predicted per interchange, except at SR-37 where none are predicted. Why none at SR-37? Perhaps there is no room for all the motels and gas stations.

*** Also, why is the interchange at I-64 omitted? Are none of the jobs shown here going to that interchange? This contradicts other parts of this dEIS which shows most benefits going to the Bloomington and Evansville areas. Was the cost of this interchange included in the cost analysis?

*** The total number of jobs predicted for all of these interchanges (2247 over 30 years) represents 51% of all jobs predicted for the entire project (4415). All of these 2247 jobs will be in the service/retail sector. The SR-37 interchange alone accounts for 755 of the 2247 jobs, or 34%. As noted above, none are shown for the I-64 interchange.

The draft does not say how many of the businesses at the interchanges will be relocations from other parts of the counties, e.g., from town centers to the nearby interchanges. This information must be supplied.

*** Page 14 states that, in Monroe County, "the Preferred Alternative will not likely cause a shifting in residential development but will likely induce new development." The draft implies this new development will occur in the south and east parts Bloomington, where it is now occurring. This denies the obvious. As the new interstate passes west of Bloomington, development of all sorts will occur near it, as shown in Table

44 and stated on page 141. With this development will come residential development. Much of this is likely to go into currently undeveloped rural areas. This is troubling, among other reasons, as this is an area of karst terrain. No measures for preventing or mitigating this development is given in this dEIS.

*** This dEIS correctly reminds us that closing 45-50 local roads will delay emergency vehicles, cause the rerouting of school buses, and increase travel distances for farmers with equipment. Many of these roads are hilly and winding and especially hazardous in winter. All of these impacts will harm local economies and make roads more dangerous. This EIS must include a social as well as economic and safety analysis of these impacts.

*** This EIS does not address the indirect aesthetic, historic, cultural, economic, or social impacts that sprawled development will have on urban areas along the corridor. Existing retail businesses will relocate to interchanges along the highway and vacate central business districts. Franchise businesses will also locate at the interchanges, further damaging the economies of locally owned businesses and contributing to urban blight. These impacts must be addressed in this EIS.

*** Other indirect impacts, such as farmland loss, storm and waste water management, and tax revenue, received no treatment. Although new development may add to tax rolls it will also cause current residents to pay more for new services (schools, libraries, police, etc.) that this new development will require. This EIS's attempt to deny these impacts is contrary to common knowledge and experience and is not adequately justified.

*** This dEIS does not address the indirect impacts of traffic congestion along SR-37 from Bloomington to Indianapolis that will ensue with the construction of this highway.

*** Pages 147 and 147 state that all Regions will increase in population over the 30 year study period for this highway. This contradicts page 122 and Table 30 which show Regions 2, 3, and 4 losing population within this time frame. Which is correct? This information is important as housing forecasts, economic activity and other indirect impacts are based on these figures.

*** This dEIS must address quesions about all "relevant [and] reasonable" mitigation measures, even if they are outside of INDOT's or FHwA's jurisdiction (See 40 Questions, 46 Federal Register at 18031-32). Because it fails to do so, and for all of the above reasons, this dEIS does not satisfy NEPA requirements.

COMMENTS ON CHAPTER 3 - AFFECTED ENVIRONMENT

*** The "Geology" section fails to recognize that the entire corridor is in an earthquake zone which may require special construction techniques. This is especially true in areas of unconsolidated deposits (approximately 70% of the corridor). The costs of these special construction methods would add significantly to the cost of the project. Estimates of these costs should be made in anticipation of the requirement to upgrade construction in this area.

*** The "Wetlands" section should explain that Indiana has already lost 87% of its original wetlands. What remains is very valuable and should be especially protected, not viewed as an obstacle to get through.

Use of borrow pits to replace wetlands is unacceptable. High quality wetlands take generations to become established and develop within a set of parameters that cannot be duplicated by a borrow pit. This is not in-kind replacement.

Since the highway is in a known earthquake zone it is likely that special construction techniques will be necessary, especially around rivers and wetlands. These techniques are likely to cause more disruptions of the wetlands than anticipated in the dEIS. If the highway is to be built on piers then that option should be included along with cost estimates.

This dEIS does not adequately consider indirect impacts on wetlands due to future development and land use.

*** The "Fish and Wildlife" section notes that many SW Indiana counties have lost significant biological richness and diversity due to human developments. This project will certainly continue that trend.

*** "Social Environment, Population Trends"

Table 30 shows that the population in the 18 counties in the study area increased by 26,00 from 1900 to 1994. While Regions 2,3, and 4 show a loss in population from 1980 to 1994, these same Regions all grew from 1990 to 1994, indicating that current population trends are up for all Regions.

Data from the Indiana Factbook (1992) projects 2020 population increases for Regions 2,3, and 4. This contradicts the projections in Table 30. Based on recent demographic information and current growth rates in these Regions, the Table 30 data is probably incorrect.

In summary, the population in SW Indiana is growing and will likely continue to grow without this highway.

*** The median value of homes in Table 31 is out of date. The value of homes in Monroe County has risen sharply in the 6 years since 1990. Home values in the other counties are likely to show increases as well. These figures must be revised to represent current values.

*** The "Aesthetics" section is a weak attempt to make a diesel

truck smell like a newly mown hay field. This dEIS should admit that an interstate highway through rural SW Indiana will seriously degrade the aesthetics of the region. There is nothing peaceful and quiet or pleasant about a 4-lane, divided, truck corridor, roaring with traffic and emitting noxious fumes 24 hours a day, 365 days a year. The vicariously pleasant views seen by travelers in an air-conditioned car speeding by a 65mph, oohing and ahhing at the scenery, denies the loss of the real peace and quiet that was there before the highway.

*** "Economic Environment"

Some of this data, taken from the Donohue, et al., Study (1990), contradicts other statements and assumptions made in this dEIS.

Region 1: Whirlpool has not left Evansville.

The expectation figures for manufacturing employment are suspect as the Toyota Plant alone will employ approximately 1700 workers in this region.

Region 2: As noted in the text, agriculture is very important for this region. This highway will damage the agricultural businesses in the region by bisecting farms, closing roads, increasing flood risks, and reducing farm incomes.

The text notes that this region is expected to increase employment by 5496 jobs by 2020. That is more than all the jobs promised from this highway project for the whole state. This does not sound like a region in decline.

Region 3: The text states: "...the economy of Region 3 is currently quite strong and is expected to continue as such." This certainly contradicts earlier claims in this dEIS.

Region 4: The text states: "...the economy is not stagnant." However, since this region is expected to receive few benefits from this highway, and some losses due to the relocation of traffic, it is likely this region will be hindered, not helped by this project.

Region 5: The text states: "Overall, net employment in Region 5 is expected to increase by 40,101 jobs or 40%." (by 2020) This is not a depressed area.

As mentioned, all of this data was taken from the Donohue, et al., Study. A follow-up newsletter to that study entitled: Southwest Indiana Highway Feasibility Newsletter, a Special Information Bulletin from the Indiana Department of Transportation and Donohue & Associates, Inc., July 1989, under the headline: "Encouraging Economic Outlook for Region" states:

"What will be the economic future of Southwest Indiana if none of the alternative corridor improvements are built? Assuming no changes in the regional highway network, Southwest Indiana can still expect to experience employment increases

of up to 40 percent over the 1985 levels by the year 2020. The most rapidly growing parts of the region will be the area of Martin, Dubois and Spencer Counties where employment increases should exceed 43% and in the Bloomington/Bedford area, including Owen, Greene, Morgan, and Monroe, and Lawrence Counties with a forecast employment growth rate of 40%."

It goes on:

"With enhanced regional cooperation between communities and counties, Southwest Indiana can expect to capture its share of the growth occurring in midwestern states today."

*** The text on page 134, stating the average incomes of the study area, shows significantly different figures than Table 37. Both of these figures are out of date and probably inaccurate.

Under "Industrial Development and Growth", page 136, it states: "All the regions experienced employment growth between 1987 and 1993 and all except for Region 4 are projected to have employment [growth] between 1993 and 2020." As we pointed out earlier, Region 4 will not be helped but hurt by this highway.

All of the above data reinforce the conclusion that this highway is being promoted to fix a problem that doesn't exist. Southwest Indiana is a region of the state that is improving without it. In fact, the new highway construction will increase economic problems in some parts of the region.

COMMENTS ON CHAPTER 4--ENVIRONMENTAL CONSEQUENCES

Economic Impacts:

*** The number for "Total New Employment" for the "Rest of State", Table 40, is incorrect and differs from Table 6.2, Appendix A. It should read "572".

Social Impacts:

*** The text on page 145 reads: "There are no neighborhoods being divided or split up." (by this highway) This statement shows a complete lack of understanding of rural communities. Rural, agricultural areas are indeed neighborhoods, albeit more widely spaced than urban neighborhoods.

The National Historic Preservation Act Amendments of 1980 (P.L. 96-515, 94 Stat. 2987, 16 USC 470), Section 502, directs the Secretary of the Interior and the American Folklife Center to develop recommendations "to preserve, conserve, and encourage the continuation of the diverse traditional prehistoric, historic, ethnic, and folk cultural traditions that underlie and are a living expression of our American heritage."

Since there appears to have been no cultural specialist or folklorist on the consulting team for this project we question if the above mandate was properly carried out. Two groups that should have been more carefully studied are the Amish and the German-American communities affected by this project.

This dEIS identifies low concentration of "ethnic groups" affectd by the preferred route; these groups are identified as African Americans, American Indians, Asians, and Hispanics. Limiting ethnicity in this way is too exclusive.

Ethnicity is best defined as the sharing of historically derived cultural tradition and styles that are acquired primarily through descent and which set a group apart from the larger society. By this definition the German-Americans, as well as the Amish, are ethinic groups. As such, the impact of this highway on their lifestyles should have been more carefully studied.

*** As this draft shows, approximately 45 roads will be closed and many farms split by this highway. This will unavoidably divide rural neighborhoods. It will cause the rerouting of school buses, often leading to more time traveling to and from school functions and discouraging participation in afterschool events. It will separate neighbor from neighbor, congregations from their churches, and residents from community centers and businesses. It will also slow response times for police, fire, and other emergency vehicles.

*** In chapter 2, Table 26, Evans Lane, in Monroe County was not mentioned. This road will be crossed by the preferred alternative and several homes would be landlocked if they are not given access to another road. This oversight must be

corrected.

*** The dEIS states: "The SW Indiana Highway Corridor EIS... determines that the project does not impact minority or low income populations." This contradicts earlier assumptions in this dEIS that SW Indiana is an economically depressed area with below average incomes. Does this population have low incomes or not? This draft attempts to have it both ways.

Air Quality Impacts:

*** The statement: "CO was the only pollutant studied since accurate modeling techniques for hydrocarbons and nitrogen oxide do not exist." (p. 150), is simply false. Comments on this same page from the Evansville MPO mentions modeling for HC, CO, and NOx. Precise modeling techniques for these pollutants are available and being used in other areas.

No mention is made in this analysis of increases in CO2 emissions. This gas is a major contributor to global warming. As shown in CO2 Diet For A Greenhouse Planet: A Citizens Guide For Slowing Global Warming (1990), by John Decicco, et al., the transportation sector accounts of 33% of CO2 emissions in the U.S. As it induces and increases travel this highway will increase CO2 emissions.

The information in Appendix I is incomplete. Where specifically were these readings taken? What was the time of day and weather conditions? Without this additional information these numbers are meaningless.

Reducing traffic congestion does not necessarily improve air quality. Australian researchers (P.W.G. Newman, J.R. Kenworthy and T.J. Lyons, 1988, in Journal ANZASS) have shown that although energy use and emissions are both lowest at travel speeds of 45 mph, free-flowing, uncongested traffic actually encourages more driving within a region or city, resulting in more aggregate emissions and energy consumption.

This air analysis is completely deficient and needs to be redone.

Noise Impacts:

*** Although this dEIS acknowledges many people will suffer adverse noise levels that exceed federal criteria, essentially no mitigation is proposed. The reason given is it would be too expensive. Many other people living along the route will also suffer from noise pollution even though federal noise levels are not exceeded. Raising noise levels 10 decibels or more above existing levels constitutes a significant impact. This will significantly degrade the quality of peoples' lives and their property values. (See: Hokanson, Barry, et al., "Measures of Noise Damage Costs Attributable to Motor Vehicle Travel," Technical Report 135, Iowa City: Institute of Urban and Regional Research, University of Iowa, December, 1981.) A much larger

area should be put into "Category A".

Noise pollution is not an insignificant problem. Many resorts and inns promote themselves as being in areas where it is quiet and they charge higher rates for this amenity.

Loss of peace and quiet should be compensible. If property owners near this highway wish to be moved due to excess noise and loss of tranquility, they should be relocated at state expense.

In Appendix J, site #4 is incorrectly located. SR-45 does not enter Lawrence County.

Also in this Appendix, the terms in Table 19 are not defined so interpretation of the data is impossible.

Archaeology:

*** The archaeology studies for this draft are incomplete. Only a partial records search has been done and there was no effort to assess the quality of the sites located and no attempt to determine the type or cost of mitigation procedures that will be required. This is another example of the incompleteness of many of the studies for this document. A complete and thorough archaeological study must be included for the next draft of this EIS.

Visual Impacts:

*** A cost estimate should be given for any methods being considered to reduce visual impacts, e.g., wildflower strips, reforestation, and creation of wetlands. INDOT has done all of these procedures in other areas so figures should be available.

Floodplain Impacts:

*** No mention was made of the floodplain impacts in areas with steep ravines cut by intermittent streams. These areas carry large volumes of water in short time periods. Blockage of these usually dry streams by the highway would cause serious flooding during and after heavy rains. Standard sized culverts would not maintain normal stream flows in these areas.

Since the karst study is incomplete, there is no information on flooding risks in karst areas. This is a serious threat and must be addressed in this EIS.

Impacts On Agricultural Lands:

There is a pervasive urban bias throughout this dEIS. Earlier we commented on the false statement that no communities would be split-up by this highway and that no ethnic groups would be impacted by it. In this section the highway's negative

impacts on agricultural economics and rural communities are ignored or downplayed; meanwhile, the assumed positive impacts on urban economies and new development are compounded and exaggerated. This bias is displayed in several ways in this section, as shown in the examples that follow.

The data on the cost of farmland, where given, is outdated. The cost of land in Gibson County is not given at all. Land values in Gibson County were relatively high prior to the siting of the Toyota plant there, since then they have risen steeply. The values are not as difficult to obtain as this study says, they could be obtained from auction houses, or other sources.

On the other end of the scale, inclusion of reclaimed strip mined land in Pike County brings the average land values down. Together, these factors will lead to an underestimation of the value of land in SW Indiana.

Property tax rates from 1990 and 1992 were used here. Rates are much higher now and these figures are available.

The analysis years used to estimate crop prices, 1991-93, were low grain-price years. The data also does not show what time of the year prices were calculated. Prices determined at harvest time may be lower than prices obtained later. Inclusion of crop yields on reclaimed strip mined land in Pike County brings down the average yields for the entire region. Again, this will lead to an underestimation of the value of agriculture to the region.

More land may currently be in production than estimated here. Much Conservation Reserve Land is now going back into production. Also, the amount of acreage on corn varied greatly in the analysis years of 1991-93. Now that price supports are being phased out the amount of land planted to various grains will change. More current information on the amount of land planted in each type of grain is available.

Although this highway will have major direct impacts on regional agricultural economies, these impacts will be spread out and compounded due to its indirect impacts. The American Farmland Trust, in: Is Farmland Protection A Community Investment?, 1993, estimated that for every dollar earned by farmers, up to five dollars are earned by related businesses in the region. These negative indirect impacts must be included in the costs of this project, just as the indirect benefits are.

Closing up to 50% of the local roads for this interstate will create many costs for farming economies. Farm equipment will be moved farther on local roads creating time delays and increasing safety hazards. Dead end roads, which typically get less maintenance, lower property values. There will be increased risks of flooding due to construction of the roadbed above the 100 year floodplain. Many farms will be physically divided by the highway making continued operations difficult or impossible. Some farms will go out of business.

Repairing and upgrading local roads would do much more to help the family farms of SW Indiana. Many of these roads are posted in winter months making it difficult for farmers to get their products to market when prices may be optimal.

Most bulk farm products grown in SW Indiana, as elsewhere, are not shipped long distances by trucks. They are shipped only to the nearest rail or barge site.

Concern about the impacts of this highway project on agricultural economies has been demonstrated by the Gibson and Daviess County Farm Bureaus; Both passed resolutions opposing the new terrain route for this highway.

In its 1996 "Vital Signs" report, the Worldwatch Institute drew attention to worsening grain shortages: The world grain harvest for 1995 was the smallest since 1988, and grain reserves--the grain available to the world if all production stopped--were at an all-time low of just 48 days of consumption.

It may seem obvious, but sometimes we act as if we have forgotten this simple fact of life--farming is more than just a business, it is the food we eat, not just in this country but around the world. We need to treat farming with more respect.

Farming operations are businesses; they must be listed and treated as such in this dEIS. Current information on crop and land prices, as well as this highway's direct and indirect impacts on farming economies, must be calculated and used for this dEIS. If this is done, correctly and completely, it will be apparent that there is now a viable, sustainable agricultural-based economy in much of SW Indiana. This economy will be seriously damaged by this highway project.

Historically and geographically, much of SW Indiana is well suited to farming. These farms are businesses as well as a way of life and they have great value. Their true worth must be acknowledged in this study.

Water Body Modification and Wildlife Impacts:

*** "Hydrology Report and Risk Assessment" forms for stream crossings 41A and 36A were not included in Appendix L.

In these forms the "Adjacent Property Values" category reads "low" for all the stream crossings in Monroe County. We submit that there is no property in Monroe County that has "low" value. All land in Monore County (except PCB contaminated sites) is now selling at premium prices. We question when these hydrology surveys were done.

This section acknowledges there will be wildlife impacts, habitat loss and forest framentation, changes in hydrology and disruption of biological corridors, but these losses are not quantified or given a cost analysis.

Comparing the losses of forests in the ROW to the forests remaining in the affected counties, or in all of Indiana, is misleading. Since Indiana has already lost most of its forests what's left is very important. And it is important that it be kept intact, not further fragmented.

Most losses to forests did not come in large chunks but bit by bit. Also, the over 1000 acres lost directly to this highway will be only the beginning of even greater losses due to this project. The development that follows these highways will compound forest and other habitat losses.

Loss of habitat is one of the most important environmental problems in Indiana and the world. There is already too little habitat to support many species, e.g., neotropical migrant warblers. Wildlife cannot simply go somewhere else, as this dEIS implies, when their habitat is destroyed.

Water Quality:

*** Salt runoffs were considered to be insignificant in this study. However, some assumptions were flawed:

1) The study assumes there would be only one salting per snowfall when, in fact, there may be several, especially after heavy snowfalls. This would double or triple the salt concentrations in the runoff and put it well into the range that is harmful to wildlife.

2) There is little discussion of salting in karst areas. This is a serious problem and must be thoroughly studied. Presumably, other methods of deicing would have to be use in these areas. Unfortunately, the karst study is incomplete.

3) The impacts of salting on local species was not studied, nor were studies cited that looked at the impacts on these species.

*** No studies were done to determine the possible impacts of construction and run-off on private wells. This is a serious concern as many people in these rural have their own wells. It is especially worrisome in karst areas where much of the water flow is underground and subject to construction impacts some distance away.

Procedures must be outlined for pre- and post-construction monitoring of wells and ground water.

These concern must be addressed, including who is liable if wells are contaminated or flow reduced or stopped.

Energy Impacts:

*** As this draft acknowledges, ninty-two miles of new interstate will induce more traffic at higher speeds which will increase energy consumption. (see also: Donohue et al., Study, 1990 and P.W.G. Newman, J.R. Kenworthy and T.J. Lyons, 1988, in Journal ANZASS). The suburban sprawl that follows interstates will also cause more driving and more energy use. Contrary to the statement on page 183, this highway will not improve overall traffic flow. The congestion that will occur on SR-37 will increase energy consumption. Closing between 45 and 50 local roads will increase travel on these roads and increase energy consumption.

In spite of these known impacts no energy analysis was performed for this project. We find it difficult to believe that insufficient information was available to do such a study. INDOT has had ample experience in these matters. Lack of this analysis is a serious deficiency in this dEIS. Such an analysis

must be included in future drafts.

Relocation and Right-Of-Way Study:

*** It is understandable that the Amish community should receive consideration in keeping roads open (p. 184). However, we feel all farmers and rural dwellers along the route deserve the same consideration as they will be equally impacted. The Amish are not the only rural residents that have close knit communities or whose lifestyes would be impaired by these road closings.

*** No date was given for the information on the chart on page 185. This is important as housing values have risen sharply in recent years. The charts on page 194-95 used 1991 data. These are likely to be inaccurate, especially for Monroe County and Gibson County which is the site of a new Toyota manufacturing plant. More current information must be used for these charts.

*** Does the ROW cost estimate include the cost of the limestone reserves, coal and gas reserves, and the current value of timber? The value of the limestone alone is estimates at over $300 million (p. 217).

These costs appear not to be included. We also need to know when the land appraisals were done and what width of ROW was used for the charts on pages 198-99.

The earlier dEIS for the Bloomington to Newberry segment of this highway (Feb. 1992), shows almost exactly the same values for ROW costs as this draft, except for segments 10C and 10E. The 1992 draft also shows higher relocation costs than this draft. Why have the ROW costs gone up for one segment and not the others? Why have relocation costs gone down when there are more houses in the ROW?

This draft states that the number of relocations was taken from the aerial photos. There is no information given as to when these aerial photos were taken, but we believe they were shot as long as 5 years ago. There has been a lot development along this corridor in the past few years. Relocations and associated costs must be based on recent information.

*** More recent information is available for estimating property tax losses. Why was it not used?

--- The demographic data on pp. 205-215 was taken from the 1990 census. Since more recent information is available, e.g., the Indiana Factbook, (1992 or 1994-95); it should have been used.

The Relationship Between Local Short-Term Uses...and Enhancement of Long-Term Productivity:

*** This section is nonsensical. Clearly this highway will cause serious long-term disruptions in SW Indiana. Ignoring

such impacts is indicative of the biased nature of this draft in favor of this project. Promoting this highway by downplaying negative impacts and exaggerating benefits is the trademark of this dEIS.

COMMENTS ON BIOLOGICAL SURVEYS:

Wetlands:

*** The text points out that wetlands now make up 4.4% of the land area in Indiana and this highway would take only 0.003% of that. What the study does not tell us is that Indiana has already lost 87% of its original wetlands. And it lost them bit by bit, through numerous projects such as this highway.

The specific amount of mitigation for the lost wetlands is not given in this document; depending on the type of wetlands taken, 60-100 acres may be required for replacement. There is no discussion of where these additional acres would come from, how they would be acquired, or their cost.

Use of borrow pits to replace wetlands is unacceptable. High quality wetlands take generations to become established, and they occur within a hydrologic pattern, and with associated flora and fauna, that cannot be duplicated by digging a hole in the ground.

This dEIS also does not adequately address the indirect and cumulative impacts on wetlands due to this highway. For example, there is minimal discussion of the impact of this project on the quality of the surrounding wetlands.

This dEIS does not adequately explain the well-documented importance of wetlands not only to wildlife but on the economy of the region and the state. Destruction of wetlands can lead to flooding, contaminated groundwater, and loss of recreational opportunities.

Due to a lack of information, we do not know the impacts of this project on the amount and quality of wetlands or on the wildlife and plants that they support.

Fish and Wildlife:

*** As pointed out on page 118, Indiana has lost an enormous amount of wildlife habitat since the late 1800s. This makes the remaining habitat more valuable and in greater need of protection.

Because most listed species were not observed by the consultants in the field does not mean they are not there. This may seem obvious, as they are rare and not easily located, but it needs to be stressed. Many of the biological surveys were simply inadequate to find listed species. Although 43 listed species were identified as possible in the corridor only 8 were found. However, since many of these species have been documented as being in the area, and since there is suitable habitat, they must be presumed to be there.

Unfortunately, the measures suggested to protect the listed species that were found are minimal to none. We wonder why these studies were done at all if they serve no purpose in protecting these at-risk species. Presumably they were done to fulfill the requirements of NEPA but not the intent of NEPA.

*** It is unclear when many of these surveys were done. The

first page of Appendix E says they were done in 1993, but Figures 1 and 2 state they were done in 1992. Data for Figure 4 were collected in 1990, and Figures 3 and 4 are dated 1990. The aquatic survey for part of the route was done for the 1992 draft EIS for the Bloomington to Newberry segment (see Table 24 of the 1992 draft). That survey was done in 1990 and used in this dEIS (Table 4).

*** Earlier copies of the technical studies done for this highway (birds, bats, plants), obtained prior to the release of this dEIS, are labeled for the "Indianapolis to Evansville" or "I-69" highway, not for the "Southwest Indiana Highway Corridor" as they are labelled in this dEIS. The data is all the same only the titles have been changed to reflect the pretended change in scope of the project. The text for the "Survey of Forest Plots" study must have been overlooked as it still refers to this highway in one place as the "Indianapolis to Evansville Highway".

*** Segments of the route for the highway were changed in 1994 due to the findings of the karst survey. Therefore, parts of some of the earlier surveys (bats, fishes, plants, amphibians and reptiles) were done outside the current preferred ROW.

Fishes:

*** The cover letter from Aquatic Control, 7 & 8 October, 1993, states that their electrofishing survey was "not intended to be exhaustive", but rather to "collect a maximum of information in the shortest period of time". In short, it was a quick and dirty survey. Unfortunately, the text does not reveal what percent of the total number of species expected were actually found.

The consultants conclude that the construction of the highway will not adversely affect fish populations, but they give no reasons to support this assumption.

Mussels:

*** Ten threatened, endangered, and special concern species (TES) plus two species under federal consideration were possible in the study area but none were found. The consultants do not say what percent of the total number of species expected were actually found. The survey found so few mussels that it is a cause for concern. Either the survey was inadequate or the populations of listed, as well as unlisted, species are so low that they are deserving of serious protection. This group of animals needs further investigation.

Mammals:

*** The mammal survey found only 25 of a possible 47 species (53%). Eight listed species are documented in the area and two were found, the Indiana Bat and the Evening Bat. The bat survey

was done by a respected, independent consultant. Unfortunately, measures to protect the endangered bats are completely inadequate. The dEIS acknowledges that portions of the Indiana Bats' habitat will be destroyed during construction (p. 163).

In addition, Figure 10, Appendix E, shows that pregnant, lactating, and post-lactating bats are not found much closer than one mile from paved highways. This would appear to limit considerably the available habitat for these reproducing individuals all along the route.

Rather than the direct killing of bats, habitat destruction is the main reason for the decline of this and many other listed species. Clearly this project will adversely affect mammal populations in SW Indiana.

Birds:

*** The sighting of birds is sensitive to the season and the time of day. The limited amount of time taken for this survey and the time of year, July and September, virtually assures the number of species was underreported. Since documented records of bird surveys are available for this region they must be relied upon to estimate the species that may be affected by this highway.

*** Appendix E, page 1, states that 30 sites were observed for birds, but Table 4 lists only 24 sites.

Page 1 also states that no state listed birds or birds under federal consideration were observed, but a note at the bottom of the page says loggerhead shrikes were observed. Page 163 of the main study states that four state listed birds were observed.

*** Forest fragmentation is a major concern in Indiana as well as around the world. Temperate hardwood forests are disappearing at the same rate as tropical forests. This highway will convert nearly 1000 acres of core forest to edge forest (p. 164). This will have a significant negative impact on several species that require deep forest habitat to breed successfully (see citations for D. Whitehead in index of this dEIS, also, Where Have All The Birds Gone, Terborgh, 1989). These losses of deep forest habitat will not be mitigated for in this project.

*** The last paragraph in the bird section, page 164, is a totally irresponsible statement. It reveals a surprising lack of biological knowledge of bird biology and the importance of habitat. Implying that birds have wings and will fly somewhere else to live and breed when their habitat is destroyed is an appallingly ignorant statement.
It assumes these other areas are unoccupied and available for colonization, and shows no understanding of the problems of edge effects. Neotropical migrant warblers are suffering declines due to a lack of deep forest habitat which is scarce, and the lack of breeding success due to edge predators. This highway will compound and accelerate these problems.

Reptiles:

*** This survey, aside from 2 drift net arrays near the Patoka River, amounted to walking portions of the presumed ROW. Besides being inadequate as a survey method, there is no information on when (date, time of day), weather conditions, or precisely where along the route the consultants walked. The field survey was totally inadequate to find many reptile species documented as being there. It is not surprising, therefore, that only 10 of 40 of species possible in the area (25%) were found.

Eight state and federal listed species are possible in the area. The federally threatened northern copper bellied water snake was located on both sides of the proposed ROW. Since habitat for this snake occurs in the ROW it must be presumed present. Habitat for the state threatened timber rattlesnake also occurs in the corridor. Contrary to the statement on page 165, timber rattlers occur in old and second growth forested areas. This type of habitat is common along the route.

The conclusion that the highway should not adversely affect reptile populations in the area is unwarranted. A much more thorough study and presumption from documented records must be used for this survey.

Amphibians:

*** Eleven of thirty species possible in the area were found (37%). As with the reptiles the field survey was completely inadequate to find many species or define populations. Therefore, the affect of this highway on amphibian populations is unknown.

No date, time of day, weather conditions, or specific locations for the survey were given.

Amphibians are known to be in serious decline in many areas of the U.S. It is, therefore, especially important to know what their numbers are in this corridor. If they are as low as this survey indicates then there is a serious problem that must be investigated before this project can proceed.

Plants:

*** The plant survey done for the Patoka River floodplain was incomplete as it was done in late June to early July and therefore has a "definite seasonal bias" (Table 2, Appendix E-7). Plants were also casually identified while doing some of the animal surveys. The exact times and places of observations were not given. Approximately 30% of the species possible in the area (290/937) were observed.

Table 1, Appendix E-7, identifies 47 listed species, but only 5 were recorded for this survey. This is not surprising as the survey was so cursory.

*** The draft EIS makes the point that no legal protection is required for the state listed plant species, it merely recommends avoiding them. This implies little or nothing will be done to protect them. A stronger statement here would have

been a welcome indication that protection of these species was considered to be important. No such assurance was given.

*** None of the above surveys were thorough or exhaustive and no reasonable person would expect them to define populations or reveal many TES species. However, many state and federal TES species are documented in the area and, unless declared extirpated, must be presumed to be present.

Based on statements accompanying these surveys it is clear little will be done to protect animal and plant populations during the construction of this highway. This violates the intent and purposes of NEPA.

Survey of Forest Plots:

*** Thirty-nine tree species out of approximately 95 possible were identified. Less than one acre, out of a total of over 1000, was surveyed (0.08%).

The method of selecting trees for the survey was too vague and subjective to be scientifically valid.

The latitude coordinate for plot 9, Table 1, is incorrect.

There are forest surveys available that would characterize the forests in this corridor, e.g., the Indiana Forest Status, 1986, USDA, US Forest Service with the Indiana DNR. No other surveys were cited in this study.

The survey done for this dEIS is completely inadequate and the reasons for doing it are unclear. It certainly cannot be used as a representative sample of the entire 1000 acres. The study itself draws no conclusions as to its purpose.

It is important to state that Indiana was originally 86% forested and is now only 19% forested. What's left must be better preserved.

In Forest Policy Issues in Indiana, Dennis Le Master and Lois Rans, Department of Forestry and Natural Resources, Purdue University, concerning this highway write: "Public Policy Problem: Extension of Interstate 69 could significantly reduce forest acreage in south[eastern] Indiana and increase forest fragmentation."

Since timber values will contribute to the overall cost of the project it is important to get a better estimate of the species and sizes of the trees in the entire ROW.

Owners of condemned land should be able to opt for fair market value of the land plus the estimated total price that would be obtained for the timber if the timber were allowed to mature and to be harvested, minus the estimated cost of cultivating and harvesting the timber.

A study of timber values done by Robert Klawitter, in consultation with Bill Hoover, Professor of Forest Economics, Purdue University, set the value of the timber on the 1000 acres in the ROW at $5.4 million.

COMMENTS ON THE KARST STUDY, APPENDIX G

General Comments

*** This study is referred to as a Phase I inventory of karst features. Although the study area extends for approximately 32 miles, only roughly one-third of that distance was checked in the field for this study. The survey was for surface features only, though some subsurface features were implied.

The completion of the study was deferred to Phase II, but no date or details for the completion were given. Although this part of the study represents a good beginning, it is clearly superficial and incomplete. As it stands, it does not include sufficient information with which to determine the cost or environmental impacts of building this highway through this area and therefore does not fulfill NEPA regulations. 40 CFR at 1502.22(a) states:

> "If the incomplete information relevant to reasonably foreseeable significant adverse impacts is essential to a reasoned choice among alternatives and the overall costs of obtaining it are not exorbitant, the agency shall include the information in the environmental impact statement."

References in the main study to karst impacts (Table A, and pp.108, 115) are misleading because they do not indicate that the study is incomplete. Much more work will have to be done before the area is adequately characterized and all the impacts known.

Purpose and Need

*** As it stands, this study assumes the highway will be built and all the problems will be solved later. That should not be the intent or role of this study. A description of the necessary testing, monitoring, and mitigation procedures are important for this dEIS. Stating that these measures will be done in Phase II is not adequate. This information is needed to identify environmental, hydrologic, and cost impacts that will help determine if this project is feasible.

Nor is it sufficient to merely review the literature and consult agencies. Much of this area is poorly understood and many features are unrecorded. A detailed field study of the entire length of the right-of-way should have been completed for this dEIS. This draft should be withdrawn until this study is completed.

The "Memorandum of Understanding" (MOU) that was mentioned here as the guiding document for studying, determining, and avoiding problems in karst areas states that a report will be prepared and that: "That report will be used as a tool to assist in determining the proposed highway alignment. The intent of INDOT is to avoid karst areas and use alternate drainage where possible."

The tasks necessary to prepare such a report (MOU, pp. 1 and 2) have not been completed. Neither have alternative alignments, such as US-41/I-70, or SR-37/US-50, which would use existing roadways, been studied for this project. INDOT cannot build a highway through this area and avoid karst terrain. Therefore, the conditions of the MOU are not being met for this project.

Location of Study Area

*** The study does not adequately define the total length of the karst terrain. Does it extend to Newberry, as implied in the introduction, or to some place just beyond Koleen, as implied on page 2?

*** The locations of "Study Area #2 Ridge", and "Study Area #3 East" are not clearly identified.

*** Surface features were identified for up to 1,000 feet on either side of the presumed centerline. In many areas this is inadequate. Since much of the terrain is hilly, runoff will be carried farther than 1,000 feet in many areas and drainage problems will extend much farther. Also, during design and engineering the centerline could be moved 1,000 feet from the centerline. Therefore, a much broader band should have been studied.

Scope of Investigation

*** Figure 1 is meaningless. What do the specks represent? Presumably they are karst features of some sort, but what kind? Where is the ROW of the highway relative to these specks? What does the notation "Options for areas 2 and 3 not outlined" mean?

*** What is the relevance of Figure 2 to this project? It is not clearly explained in the text.

Part 2: Physiographic Divisions and Topography

*** The text here states the study areas are all located in the Crawford Uplands. Figure 4 also shows this. The text of the main study (p. 108) states the preferred alternative crosses the Mitchell Plain. Which is correct?

According to a DNR publication: "Special Report 47. Plate 1, "Map Showing Surface Geology Of Monroe County", 1989, by Henry Gray, SR-37 is well into the Mitchell Plain.

*** If the rectangle in Figure 5, labeled "study area" is in fact the entire study area then the scale must be wrong. According to page 1, and a variety of maps, the distance across the study area is approximately 30 miles, not the 7.6 miles indicated by this scale.

Part 4: Probable Impacts

*** As mentioned in section 4.1, flooding risks, modification of air flow and quality through cavern systems, and risks of toxicity to humans, other animals, vegetation, and livestock due to deicing salts are likely or potential impacts of this project. Risks due to toxic spills on what will be a major truck route are also major concerns. Many homes in the area are on wells and are at risk due to contamination and hydrologic changes. Indirect impacts on land use from future development due to this highway could also affect drainage, erosion, and water quality.

These problems were not thoroughly studied, nor were their economic impacts addressed, here or elsewhere in this dEIS. This is a serious flaw in this document. This is further evidence that this study is simply not adequate or complete as required by NEPA.

*** Section 4.2, "Some Previous Impacts on Karst Along Indiana's Highways" is so vague and inconclusive as to be meaningless. No conclusions can be drawn from it and we wonder why it was included here.

There are other highway projects that indicate some of the problems to expect here, e.g., the SR-37 extension from Bedford to Mitchell, the SR-37 interchange at 2nd street.

A study of highway construction in karst areas, commissioned by INDOT, was recently completed. We wonder why this study, done by Tom Aley, was not cited or used in this analysis. It would certainly be relevent here.

Mitigation

*** This section is vague and lacks specificity. No cost figures are given for mitigation, nor could there be until a more thorough study is completed. Based on experiences from other highway projects, costs to mitigate in the karst areas will add significantly to the cost of the project. These costs should at least be estimated here.

Conclusions

*** This section is also vague and inconclusive, except to indicate that serious problems remain unstudied and unresolved. It is essentially a recommendation for more studies.

Recommendations

*** This section also indicates this study is incomplete. The recommendations are general in nature and point out that considerable work needs to be done before an adequate study is available for review.

11.1

COMMENTS ON CHAPTER 8: COMMENTS AND COORDINATION

All of the public meetings listed on page 224 were for an Indianapolis to Evansville project, not a Bloomington to Evansville highway. These two projects will have different costs, and social and environmental impacts. Comments on each of them would be very different. Except for the hearing on this dEIS, there have been no public meetings or hearings on a Bloomington to Evansville project.

Many agencys' comments given here were for an Indianapolis to Evansville project.

12.1

MAPS:

The aerial photos supplied with the dEIS were of poor quality and some pages were unreadable. Although our organization eventually received a better copy of the aerials we did not receive the topographic maps we requested. None of the aerial photos has identifying landmarks labelled, e.g., roads, waterways, township sections, or county lines.

Topographic maps, with the ROW clearly and precisely drawn in, would have been very useful in locating possible impacts for archaeological and biological studies. The aerials simply did not suffice for these purposes. Lack of such maps reduced our ability to comment thoroughly on this project.

Our earlier letter to INDOT Commissioner Stan Smith on this matter is included as additional comments. (see next page)

-122-

C.A.R.R.
Citizens for Appropriate Rural Roads
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18 May 1996

Commissioner Stan Smith
Indiana Department of Transportation
Indiana Government Center, Rm N755
100 N Senate Avenue
Indianapolis, IN 46204-2249

Re: Draft Environmental Impact Statement
Southwest Indiana Highway Corridor

Dear Commissioner Smith,

Our organizations are currently reviewing and preparing comments on the above referenced dEIS. Unfortunately, the extremely poor quality of many of the aerial photographs and various other maps make an adequate study of the document impossible. Many of the aerial photos are too dark to read and not referenced to topographic maps. Referencing is important to understanding the highway in a broader context and relating the route to surrounding biological, archaeological, and geological features as well as to existing infrastructure.

The biological, archaeological, wetlands, and forest surveys, as well as the karst study, cannot be completely evaluated without better quality maps. The map in Figure 1 of the karst study, for example, is completely useless. Readable maps are also essential for private property owners, especially farmers, who need to identify, assess, and plan for the impacts of this highway on their property and businesses.

Therefore, we request that the preferred as well as the alternately studied routes for this highway be clearly and precisely drawn on U.S. Geological Survey Topographic Maps with a scale of 1:24,000. These maps are readily obtained and inexpensive. We understand the need to protect unpublished cave sites and are not asking that these be identified on the maps. However, other karst features such as sinkholes and springs should be identified.

These improved maps should be made available as soon as possible as we are already well into the public comment period for the dEIS. If the maps cannot be prepared within a reasonable period then the comment period for the project must be extended.

The improved maps should be provided not only to our organizations but also to the libraries where copies of the dEIS are located and to anyone who ordered copies of the document.

Without these maps the true and complete dollar costs of this project cannot be assessed. Nor can its total impacts on the sociological, biological, and geological environment be determined.

Surely the taxpayers who paid the consultant $1.25 million for this study, and who will pay for the highway if approved, have a right to enough information to determine the study's merits or lack thereof.

Sincerely yours,

Thomas R. Tokarski, President
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cc: Senator Richard Lugar
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Lt. Governor Frank O'Bannon
Representative Jerry Bales
Representative Mark Kruzan
Senator Vi Simpson
Senator Becky Skillman
Mayor John Fernandez
Eugene Cleckley, FHWA
Arthur Fendrick, FHWA

MITIGATION

*** This section is so vague, noncommittal and incomplete that it is meaningless. Mitigation measures and costs are a very important part of this project, to give them only 2½ pages (half of which deals with blasting techniques to protect limestone reserves) speaks to INDOT's lack of interest in this part of the project, and is a serious deficiency in this dEIS.

The frequent use of phrases such as "efforts shall be made", "consideration will be given", and "as much as possible", create great uncertainty as to the likelihood of the fulfillment of any of these measures.

*** Mitigation Measure 1 says existing drainage patterns "will not be altered" by this project. We find this very difficult to believe. On page 167 it says 8 streams will be channelized; this will unavoidably alter drainage patterns. Also, the use of culverts to preserve drainage patterns will, in many cases, be inadequate to maintain current flow rates. In karst areas, shifts in drainage patterns are virtually assured, as indicated in the karst study done for this dEIS. Also, since borrow pits will be used to replace some lost wetlands their impact on existing drainage patterns must be addressed.

*** Measure 3-- As with Measure 1, it is difficult to believe that "current water regimes will be maintained", especially in wetlands. This highway will be a huge dam which must be built above the 100 year flood plain. Unless it is built on stilts it will have to alter water regimes. What impacts will building up the roadbed have on surrounding farm fields? Will it increase flood risks?

*** Measure 5-- This general declaration to minimize impacts everywhere is a hollow promise in light of the rest of this section. Is the money available to undertake all of these measures? Was this money included in the cost figures? This section is very uncertain as to funding possibilities.

For much wildlife, creating habitat in the ROW is creating death traps. Other parts of the dEIS state that nothing will be done to mitigate noise impacts. Visual impacts for those living near the ROW will hardly be minimized by planting wildflowers. We have lots of wildflowers now, without the noise and fumes.

Where will the use of deicing chemicals be reduced?

Finally, closing nearly 50% of the local roads that this highway will cross is not minimization of impacts.

*** Measure 10, in an ambiguous, irresolute tone, seems to say that maternal nest trees being used by Indiana Bats will not be cut while the bats are using them, maybe. This is not reassuring or acceptable. What effect will the loss of significant habitat have on the reproductive success of this endangered species?

*** Measures 12, 13, 14-- The vague wording of these measures means there is no guarantee of any reforestation for the over 1000 acres of forest that will be lost.

If lost forests were to be replaced at a ratio of 3:1, as indicated here, where and how would this additional 3000 acres be purchased and what is the estimate of its cost? If willing sellers could not be found would private land be condemned for this replacement?

*** Measure 15 gives more detail and more careful consideration to blasting procedures to protect limestone reserves than to all other measures to protect the environment put together. This shows where INDOT's priorities lie--avoiding potential law suits rather than protecting the environment. It also shows that this draft can be very specific in describing mitigation procedures where it chooses to be. Such specificity and clarity should be given to all of the measures in this section.

*** The last sentence on page 220 is especially revealing. It is essentially a disclaimer for any and all damages done to public and private property owners during and as a consequence of the construction of this highway. It attempts to pass responsibility for damages from state agencies to the private contractors. We question if this is legally binding. The Indiana Code that addresses this matter must be cited here.

Does this vague disclaimer also apply to the affected limestone companies, or were they given greater protection? We need to see the written agreement between INDOT and the limestone companies in which liability for damages due to construction is discussed.

We feel that all property, public and private, must be insured by the state and/or federal government against all unintended damages, direct and indirect, and long as well as short term. Failure to compensate owners for losses may be a violation of the 5th Amendment of the U.S. Constitution--taking private property without just compensation.

14.1

CONCLUSION:

Many grandiose highway plans have been devised over the last 40 years, but the world has since changed. Federal laws, our increasing understanding of the importance of environmental integrity, regional land use goals, and the importance of using available funding require decisionmakers to question their earlier objectives and reassess whether projects are really needed. An environmental impact statement is not supposed to merely justify plans made many years ago. Instead, it must evaluate these plans in light of todays's environmental and economic realities.

The dEIS for the Southwestern Indiana Highway Corridor does not do this. It does not seriously examine the many negative environmental, social, and economic impacts that this highway would have and it fails to consider, rigorously, alternatives to constructing it. We urge INDOT to repair all of these problems. When this is done, it will be clear that the Southwest Indiana Highway Corridor, as proposed in this dEIS coannot help solve any of our transportation, social, economic, or environmental problems, it can only worsen them.

Thank you for considering our comments.

Note: Please see attachment 14.1 requesting an extension of the comment period.

C.A.R.R.
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10 February 1997

Honorable Curt Wiley, Commissioner
Indiana Department of Transportation
Indiana Government Center North
Room N755
100 North Senate Avenue
Indianapolis, IN 46204-2249

Re: Supplemental Comments On The dEIS For The Proposed Southwest Indiana Highway Corridor, Evansville-to-Indianapolis (I-69) Highway Extension

Dear Commissioner Wiley:

Since the close of the comment period for the draft Environmental Impact Statement (dEIS) for the above referenced project, we have been made aware of a very serious situation that is not adequately addressed in the dEIS and must be addressed in the final EIS, or supplemental dEIS. We are therefore submitting these concerns as supplemental comments to our previous submission on the dEIS.

Our concern is the presence of underground mines along the right-of-way for the southern portion of the preferred alternative. These mines are abandoned and, since many of them are unmapped, their exact locations are frequently unknown. These mines pose a risk to human life due to unexpected subsidence as well as a serious risk to water quality due to disturbance of the water table and acid and toxic runoff (see below). These mines also create potential safety hazards for construction workers since they may be filled with methane gas. According to a former employee of the Indiana Department of Natural Resources, Division of Reclamation, similar mines have been known to explode with considerable force and burn violently when accidentally ignited.

The problems that abandoned coal mines can cause were demonstrated in March 1995, when a section of I-70 east of Cambridge, Ohio, collapsed due to a flooded abandoned mine beneath the highway, damaging three cars and a truck and sending one motorist to the hospital. Although no one was seriously injured, portions of a six mile stretch of I-70 were closed for about five months for repairs costing millions of dollars. Portions of I-470 in Belmont County, Ohio, were closed in September, 1996, for repairs after inspectors found underground voids that could cause the same kind of freeway collapse that occurred on I-70. (See enclosed exhibits 1-5.)

Fortunately, The Indiana Geological Survey (IGS) has maps that show the areas where abandoned mines may be located. A review of these maps make clear that the preferred route for the Southwest Indiana Highway passes over many of these areas.

McGillem and Associates presented their concerns with underground mines along this route in July, 1992. On pages 89-90 of their report Southwest Indiana Highway Corridor, Final Report Of Findings And Environmental Overview, Section II, Petersburg to Newberry, the authors state their concerns regarding subsidence: "The project lies in a heavily mined area and there are likely to be active and/or abandoned surface coal mines and/or abandoned underground coal mines along the planned routes. The Indiana Geological Survey has series of open-file USGS 7.5' quadrangles that delineate all known and active and abandoned coal mines. Those maps can be made available for public review. The Directory of Indiana Coal Producers by the IGS, available through our Publication and Sales Section, contains county scale maps that delineate surface coal mines and the locations of known shaft mines. Some very old underground coal mines were never recorded and may therefore cause unanticipated problems with subsidence."

The existence of abandoned coal mines was also noted in the Southwest Indiana Highway Feasibility Study, Donohue, et al, 1990, pages 12.8-12.9: "Abandoned surface and underground mines adjacent or in the vicinity of highway construction in these areas could create serious impacts to water quality. Some mines control the water tables within their watersheds and if disturbed could impact wells, ponds, lakes and streams by acid and toxic runoff. Such potential impacts to water quality would require evaluation in the EIS prior to highway construction."

In addition, we have been informed that the DNR, Division of Reclamation submitted written comments in response to a request from INDOT or its consultants. The Division's comments mentioned the existence of the abandoned mines and the problems that they pose.

In spite of these prior warnings, the dEIS includes no detailed study of these mine hazards. There is no detailed discussion of their potentially serious water quality impacts, and no discussion of the risks posed by subsidence, and explosions. The dEIS does not even mention how it intends to minimize these risks in the planning and construction of the highway.

Instead, the entirety of the dEIS's treatment of this issue consists of a few brief and general references to the mere existence of these mines. (See pages 114, 226, 250, 263-65.) Despite evidence that INDOT may have already located some of them (page 265), the dEIS does not identify these sites. The Indiana Geological Survey maps detailing the areas of suspected

underground mines are not shown or mentioned. The DNR Division of Reclamation is not even listed among the agencies asked to comment in the preparation of the dEIS. (See page 223.) If this agency was not asked to comment, this would be a serious omission given that it has information on abandoned mines; if it indeed did submit written comments, those comments should be included.

The draft EIS's cursory treatment of the significant environmental and public health issues posed by abandoned underground mines is plainly inadequate under NEPA. As noted by the Donohue Study, the EIS should contain a detailed discussion of the "serious impacts to water quality" that could result from acid and toxic runoff caused by highway construction near these abandoned mines. (See 40 C.F.R. 1502.16.) It should also contain a detailed discussion of the threats to public health (and to construction workers) posed by subsidence of, or explosions in, the mines. It should also contain a discussion of the ways in which INDOT will minimize these threatened impacts and their costs.

The dEIS goes to great lengths to explain, in technical detail, how blasting would be done to avoid fracturing limestone reserves located in the northern portion of the route. The problems of abandoned, unmapped coal mines, which pose a threat to human life, are at least as important as limestone reserves and must be exhaustively studied. The measures that will be used to locate and stabilize these underground mines must also be detailed in the final EIS, or supplemental dEIS.

We urgently request that you accept these supplemental comments on the dEIS for the Southwest Indiana Highway and seriously study, and address in the final or supplemental dEIS, the problems that they raise.

Sincerely yours,

Thomas R. Tokarski

Thomas R. Tokarski
President, CARR

Andy Knott,
Air and Energy Policy Director TRT for
Hoosier Environmental Council

Alexander Ewing
Staff Attorney
Environmental Law and Policy Center
of the Midwest TRT for

cc: FHwA

exhibit 1

PAGE 13
19TH STORY of Level 1 printed in FULL format.

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March 16, 1995, Thursday

SECTION: EDITORIAL & COMMENT, Pg. 12A

LENGTH: 378 words

HEADLINE: HIGHWAY HOLES;
DON'T TRUST TO LUCK ON ABANDONED MINES

BODY:
There seems something fundamentally wrong with building interstate highways over terrain that's as solid as Swiss cheese.

Yet that evidently is the case with I-70 and I-77 as they traverse the coal country of eastern Ohio.

Abandoned mines, some well over a century old, abound. About 4,100 such mines are known, and officials speculate that perhaps 2,000 more exist.

As the Dispatch reported the other day, the 8-mile stretch of I-70 from St. Clairsville to Lansing takes that heavily traveled highway over what may be the most extensively mined area of Ohio.

The motoring public would like to believe that a generation ago, when the interstates were being built, engineers were well-aware of the man-made spaces that yawned below, and were well-satisfied that none suddenly would swallow a section of highway with whatever hapless trucks and cars might be on the spot.

But what did the engineers know?

Certainly there was public pressure to push the highways through. The interstates were to meet a major need for dependable, smooth-flowing, high-volume travel from Point A to Point B.

The public was eager to have the network completed. In hindsight, especially after the recent collapse of I-70 about 4 miles east of Cambridge, it's easy to say that highway officials and construction companies should have taken greater care - maybe drilling and filling before building the road (now part of the repair process), or excavating and repacking, or choosing another path, or nixing specific sections of the interstate project as not feasible because it simply would cost too much to ensure a stable roadbed.

Based on what was known, perhaps engineers should have figured that eventually the ground water moving in mined-out spaces would weaken the formation on which the highways - and lives - depend.

Ohioans have enjoyed the benefits of mining for many years. Now they're stuck with the consequences. Any issues raised about who should have done what may not easily be resolved without expert review.

Of greater concern at the moment is what preventive steps, if any, should be taken now to protect a major public investment, providing convincing assurance that it's safe for people and heavy vehicles to continue using these routes.

LOAD-DATE: March 17, 1995

exhibit 2

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June 11, 1995, Sunday

SECTION: NEWS LOCAL & NATIONAL, Pg. 1A

LENGTH: 438 words

HEADLINE: I-70 REPAIRS EXPECTED TO BE DONE THIS MONTH;
CREWS ARE FILLING IN COAL MINE TUNNELS

BYLINE: Mike Lafferty, Dispatch Staff Reporter

DATELINE: CAMBRIDGE, Ohio

BODY:
Repairs to fill abandoned coal mine tunnels under I-70 near here will be completed later this month, although similar repairs under the I-70 and I-77 interchange won't be finished until November, officials said.

Work to pump a mixture of cement and fly ash, called grout, into 1,800, 6-inch-wide bore holes under a quarter-mile section on both sides of I-70 is complete, say state highway engineers.

Workers are now pumping grout into test bore holes drilled to ensure the original boring and filling work did the job.

"By June 21, we want to be paving. It looks like we'll be real close to that," said Renee Payette, project engineer for the Ohio Department of Transportation.

On Wednesday, the department awarded a $ 4.7 million contract to Howard Concrete Pumping, a Pennsylvania company, to fill voids found under on-off ramps at the I-70 and I-77 interchange.

"It may be down to one lane, but we're going to keep the interchange open," department spokesman Sandy Brandt said.

Even so, vehicles will be rerouted to interchanges at Rt. 22, to the north, and Rt. 209, to the south, depending on which ramp is being repaired.

The interchange work is to begin this week and is scheduled for completion during November.

The area of eastern and southern Guernsey County is one of a number of places in the state where abandoned coal mines pose a threat to highways and buildings.

The $ 2.9 million repairs to I-70 were needed after a section of the eastbound lanes, midway between Cambridge and Old Washington, collapsed March 4. Four vehicles, including a truck, plunged into a hole 15 feet wide and 10 feet to 15 feet deep when the roadway fell into an underlying void in the loose bedrock. One person was hospitalized.

Work to fill the tunnels and voids has been proceeding 24 hours a day.

The interstate was built over abandoned coal mine tunnels 50 feet to 60 feet under the roadway. The void formed when loose rock under the roadway began to collapse into the tunnels, and it gradually moved toward the surface until the highway collapsed into it.

Testing revealed that an 1,800-foot-long area under the interstate in both

directions is underlaid by the tunnels, and those tunnels needed to be filled or their walls stabilized.

The roadway was closed and traffic was rerouted across Rt. 40 between Cambridge and Old Washington. That detour has residents who live along the roadway complaining about traffic and safety concerns.

The State Highway Patrol has reported more than three dozen accidents along the detour route, and more troopers have been assigned to monitor traffic.

GRAPHIC: Photo, Mike Lafferty/ Dispatch, Workers load grout into a pumping device on I-70, east of Cambridge, Ohio.

exhibit 3

10TH STORY of Level 1 printed in FULL format.

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August 17, 1995, Thursday

SECTION: NEWS LOCAL & NATIONAL, Pg. 1C

LENGTH: 274 words

HEADLINE: WESTBOUND I-70 LANES REOPENED;
SINKHOLE FORCED CAMBRIDGE STRETCH TO CLOSE IN MARCH

BYLINE: Dispatch State Service

DATELINE: CAMBRIDGE, Ohio

BODY:

More than five months after an abandoned mine caved in, motorists last night were allowed to use the westbound lanes of I-70 in Guernsey County east of Cambridge.

It was the first time since March 4 that all four lanes of I-70 have been open on the 6-mile stretch between I-77 and Rt. 285, the Old Washington exit.

"We appreciate the patience of all the motorists and local residents who have been affected by this project," said Jerry Wray, Ohio Department of Transportation director.

"It's never easy to divert interstate traffic, but when a highway is unsafe, we must make tough choices," Wray said.

Four vehicles, including a truck, plunged into a 15-by-15-foot crater that opened up in the eastbound lanes March 4. One motorist was hospitalized.

The collapse of an abandoned mine shaft under I-70 was blamed for the sinkhole.

Nicholson Construction and Transportation Department crews worked 24 hours a day, filling voids under the interstate with a mixture of cement and fly ash.

The eastbound lanes opened June 25.

The reopening of the westbound lanes was delayed after vibration tests revealed persistent problems beneath the pavement, Wray said.

As a result, Wray said it was decided to build "land bridges" over two sections in the westbound lane.

Shelly and Sands Construction of Zanesville, Ohio, was hired in July to build two reinforced structures.

Wray said the cost of the repair project probably will exceed $ 3 million.

Cash Mizel, deputy director of the Transportation Department's District Five office in Jacksontown, said that department crews will continue to monitor the site.

GRAPHIC: GRAPHIC UNAVAILABLE

LOAD-DATE: August 19, 1995

exhibit 4

4TH STORY of Level 1 printed in FULL format.

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September 13, 1996, Friday

SECTION: NEWS LOCAL & NATIONAL, Pg. 1B

LENGTH: 436 words

HEADLINE: HOLES IN EARTH CLOSE ANOTHER INTERSTATE

BYLINE: Scott Powers, Dispatch Staff Reporter

BODY:
Ohio highway officials yesterday closed I-470 in Belmont County. Inspectors found underground voids that could cause the same kind of freeway collapse that occurred on I-70 last year near Cambridge.

Shut down were about 7 miles of I-470. The stretch is between St. Clairsville and Rt. 7 north of Bellaire, on the Ohio River.

The route is a bypass for I-70 traffic around Wheeling, W.Va. It continues across the Ohio River to the West Virginia side and rejoins I-70 in Elm Grove, just east of Wheeling.

"We found voids beneath the surface, which are gaps in the soil," said Pieter Wykoff, spokesman for the Ohio Department of Transportation. "We believe they are caused by shifts in the abandoned coal mines."

There is no evident damage to the freeway itself, Wykoff said.

Most I-470 traffic will be detoured onto I-70, Wykoff said. However, hazardous-cargo traffic is not permitted through the I-70 tunnels in Wheeling, so it will be sent down Rt. 7 and then across the Ohio River via I-470 to the West Virginia side.

The transportation department hired Kokosing Construction yesterday on an emergency contract to correct the problem and then rebuild I-470. Wykoff said officials are uncertain how long the project will take but hope the bypass can be reopened late this year.

Eastern Ohio is honeycombed with coal mines, many of which have been abandoned since the 1930s. It was that type of mine that subsided beneath I-70 in March 1995, causing a portion of the freeway to collapse.

Three cars and a truck dropped into the sinkhole, and a woman in one of the cars was injured. Six miles of I-70 were closed for nearly four months.

Since then, a task force of state highway engineers and officials of the Ohio Department of Natural Resources has been surveying highways in the area, looking for other old mines that could cause the ground to collapse beneath the freeways.

Wykoff said inspectors discovered potential problems on I-470 last week. They called in heavy drills and radar equipment to investigate further and found the voids under the freeway.

He said Kokosing is expected to begin work today.

Kokosing was hired on an emergency contract because it would have taken five or six months for the state to put the job out for bids, Wykoff said.

"They have the heavy-duty kind of equipment to get the job done," he added.

On I-70 and Rt. 660 in Guernsey County - another highway where mine subsidence problems were discovered - the highway department injected fill into the voids. That method can't be used with I-470 because the voids are too large, Wykoff said.

GRAPHIC: map

LOAD-DATE: September 14, 1996

exhibit 5

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The Columbus Dispatch

September 22, 1996, Sunday

SECTION: NEWS LOCAL & NATIONAL, [illegible]

LENGTH: 673 words

HEADLINE: HIGHWAY COLLAPSE PROBLEMS IMMENSE: THREAT FROM UNDERGROUND MINES

BYLINE: Mike Lafferty, Dispatch Staff Reporter

DATELINE: BRIDGEPORT, Ohio

BODY:
James Graham was a man driven this week to reopen I-470.

The roadway, a bypass around downtown Wheeling, Va., was closed Sept. 13, sending 25,000 to 27,000 cars a day on a detour over already clogged I-70.

Tests revealed that abandoned, underground coal mines threatened to collapse portions of the highway.

"By Monday you'll see twice as much iron here," said Graham, the Ohio Department of Transportation engineer in charge of getting the roadway reopened by Christmas.

He surveyed the busy, dusty work of power shovels, drills and dump trucks from atop a 40-foot pile of dirt and rock that had been excavated in the first three days of work.

But, while Graham can marshal men and machines, he has no control over what is beneath the earth. His major fear is finding large amounts of water in the mine areas that could slow or postpone the planned Christmas completion date and exhaust the $ 3 million that has been set aside for the job.

The danger of highways collapsing into old mines has received a lot more attention since vehicles plunged into a sinkhole that opened in I-70 east of Cambridge, Ohio, in 1995.

State highway engineers expect more of such problems as century-old mines in eastern Ohio deteriorate. "It's just a matter of time before something else pops up," said ODOT engineer Rick Ruegsegger.

Graham, a former mining engineer, and Ruegsegger are on a state task force charged with preparing a plan to identify the danger areas.

The potential is immense. Twenty-eight counties contain 4,200 known mines and perhaps 2,000 more mines that no one knows about, according to the Ohio Department of Natural Resources.

"We just don't have a handle on that yet," Ruegsegger said. "We have an unknown number of locations, unknown risk factors."

The mine causing the I-470 problems, known as the West Wheeling Mine, is part of a complex of interconnected mines that runs from the Ohio River northwest under I-470 for 8 miles to St. Clairsville, Ohio, and then east under I-70 for more than 5 miles. The mine was in operation from about 1905 until 1927, according to state records.

An early step to identify potential problems has been to test ground-penetrating radar supplied by the U.S. Geological Survey to learn how well it identifies mines and collapsed voids. The I-470 bypass was selected as a test area because abandoned mines line both sides of the highway.

Graham, who worked in Belmont County coal mines when he was 18, said I-470 had all the tell-tale signs of subsidence. As he talked, he stood about 50 feet off the roadway in a 4-foot-deep sink hole, formed from the gradual collapse of the bedrock into an underlying tunnel.

The radar test showed areas of collapsed earth and bedrock under the highway just a few feet beneath the roadbed. Bore holes drilled along the roadway showed the underlying bedrock was fractured.

The state plans to ask the federal government for $ 3.5 million to develop a model to gauge the risk to highways in the region.

"Nothing like it exists in any of our sister states. Nobody has a proactive model on how to assess risk to a road," said Douglas Crowell, a geologist with the Ohio Geological Survey.

The model would include information on whether mines are, or are likely to be, in a particular area; the depth of the mines; any obvious signs of sinkholes at the surface; and whether the bedrock is known to be solid.

Ruegsegger said engineers need to visit every spot where a highway has been built over a known mine or where there is reason to believe a mine may be beneath the surface.

"We can't camp out on top of one of these things forever," he said. But reading the land, matching the highway routes to the known mine maps and geological bedrock information should identify areas where tests will provide a good idea of what's going on underground.

"These mines are getting older every day. A lot of these mines are held up by very substantial wooden structures, but they're 100 years old," Ruegsegger said

LOAD-DATE: October 4, 1996

-130-

Attachment 14.1

C.A.R.R.
Citizens for Appropriate Rural Roads
P.O. Box 54
Stanford, Indiana 47463
812-825-9553
or
P.O. Box 97
Mackey, IN 47654

July 24, 1996

Stan Smith, Commissioner
InDOT
100 N. Senate Avenue
Indianapolis, IN 46204

I am writing to request an extension of the comment period on the draft Environmental Impact Statement for the Southwest Indiana Highway Corridor. As you know the deadline for public comment is August 1, 1996.

I have requested information which should have been included in the document and which CARR needs to finish our evaluation of the dEIS. I have requested from Bernardin and Lochmueller:

1) Topographical maps with the corridor designated;

2) Traffic forecast modeling information;

3) Itemization of all costs;

From Cambridge Systematics:

1) Itemization and distribution of benefits over the study period.

To date, we have not received any of this information. I appreciate your assistance in obtaining this data.

Given the scope of this project and the extensive problems with the dEIS, we request an extension of 6 months from the time that we receive all the above information.

Thank you for your prompt assistance with this vitally important matter.

Sincerely yours,

Thomas R. Tokarski
President, CARR

cc: Jane Garvey
Arthur Fendrick
Dale Wilken
Steve Cecil

Member Environmental Fund for Indiana

11663 E 475 N
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30 July 1996

Commissioner Stan Smith
Indiana Department of Transportation
Room N755 Indiana Government Center North
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Indianapolis IN 46204-2249

Report Number: FHWA-IN-EIS-95-01D
Project: F-0314(011)
Southwest Indiana Highway Corridor
Evansville to Bloomington
Draft Environmental Impact Statement
Comments of Protect Our Woods

SUMMARY

These are the comments of Protect Our Woods on the Draft Environmental Impact Statement for the Southwest Indiana Highway Corridor. Where there is disagreement between these comments and earlier oral comments of Protect Our Woods, these written comments replace the oral comments.

These comments find the Draft Environmental Impact Statement on the Southwest Indiana Highway Corridor (DEIS) inadequate in three respects. (I) The Purpose and Need analysis is inadequate in both (A) benefits and (B) costs analyses. (II) The DEIS is inadequate in its scope, in that (A) it illegitimately segments the total project and (B) analyzes an inadequate range of reasonable alternatives. (III) The DEIS is inadequate in its description of environmental impacts and in its decision that the economic benefits outweigh environmental impacts. Because of these inadequacies, the DEIS selects the wrong preferred alternative.

I. PURPOSE AND NEED

The proposed project has a low benefit/cost ratio of 1.542, assuming a 7% discount rate over 30 years. The ***Southwest Indiana Highway Feasibility Study*** (*SIHFS*) of 1990 (12) pointed out that a 1.5 benefit/cost ratio is "a reasonable lower bound" for a build recommendation. "Economic evaluations for many highway projects in other states have resulted in benefit/cost ratios ranging from 1.5 to 5.0." We believe that the benefit/cost ratio will be even lower when costs are fully evaluated.

This marginal benefit/cost ratio constitutes the benefits of this project. The benefits must be sufficient to outweigh both economic costs and negative environmental impacts. Such a small benefit/cost ratio does not justify the negative environmental impacts of this project. Moreover, the benefits are questionable because it is not clear that they will actually benefit very many people of rural southwestern Indiana. And the costs are so seriously underestimated that a more accurate evaluation would result in a still lower benefit/cost ratio.

I.A. BENEFITS

The 5 previous studies of the Indianapolis to Evansville corridor from 1966 to 1990, listed in Table 1, did not recommend building or recommended not building a new highway. The purpose of the Congressionally mandated 1990 *SIHFS* study was "To analyze the economic development potential of highway improvements in Southwest Indiana" and "To develop innovative ways to fund highway improvements in this region of the state." (DEIS 1) As a continuation of the Donohue study, most of the Purpose and Need section of the DEIS is appropriately devoted to economic development potential, since transportation need alone clearly does not justify the project. The Purpose and Need section dismisses alternative modes of transportation because "none of these modes would be able to address the need for economic development in the cities and counties in Southwest Indiana." (DEIS 24) The Traffic System Management and the no-build alternatives are dismissed because they would not promote economic development. (DEIS 26,28) Traffic safety benefits and traffic improvements between Indianapolis and Evansville would result from other alternatives, including some not considered in the DEIS, as well as the preferred alternative (see II.B of these comments).

The overriding purpose of this project is to promote economic development in four rural counties. The need for this highway, then, depends on the economic development needs of these counties and the benefits the highway would bring to them. The Purpose and Need section summarizes the results of its studies of economic development, system linkage and highway continuity, safety, traffic flow, air quality conformity, and intermodal relationships: "The information has shown that Southwest Indiana and especially the counties of Daviess, Gibson, Greene, and Pike have found it difficult to attract population and business to their area." (DEIS 24) Upgrading US 40 was disregarded because it would not help Pike, Daviess, and Greene Counties. (DEIS 12) Thus the DEIS must show benefits to these four counties significant enough to balance costs as well as environmental and social impacts.

The need analysis for the proposed highway project is defective in three ways. (1) It does not examine the question of whether the attraction of population and business is needed and desirable in the four rural counties. (2) It fails to evaluate recent information that these counties are in fact attracting businesses and population. (3) It fails to present information that enable one to determine benefits to the four target rural counties and does not demonstrate that the project will in fact result in significant economic improvement in these counties. These defects of information and analysis violate NEPA's purpose, which insists on "Accurate scientific analysis" and that "Information must be of high quality." [40 CFR §1500.1(b)] Further, NEPA specifies that agencies shall "Comply with the mandate of section 102(2)(A) to 'utilize a systematic interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decisionmaking." [40 CFR §1501.2(a)]

(1) The DEIS assumes that attracting population is a benefit to a rural county. However, the

benefits of population growth and business expansion cannot be taken for granted. In fact, Congress's Declaration of National Environmental Policy in the NEPA recognizes "particularly the profound influences of population growth" and "industrial expansion" as part of the "profound impact of man's activity" that has made NEPA necessary. [42 USC 4331(a)] NEPA recognizes population growth and industrial expansion as part of the problem, not part of the solution. The DEIS must show that population growth and business expansion will benefit the people of the four target counties.

More important than population growth and growth in total disposable income is growth in per capita personal income and wages, which shows that people are economically better off. More money and more people can just cancel each other out, and growth in disposable income may mean higher business profits without higher incomes for working people. Wage growth is an even more important indicator of economic improvement than growth in per capita personal income, which may indicate increasing average local wealth but gives no indication of how it is distributed through the population. But neither per capita personal income nor growth in wages is evaluated.

Polls have repeatedly indicated that Americans prefer to live in small towns in quiet rural areas. Many residents of the four rural counties in the project area choose to live there because, like most Americans, they prefer to live in quiet rural areas, which are distinguished by their relatively small populations. The DEIS should systematically study the preferences of local residents in order to determine the validity of this "need" for population growth.

Economic advantages to rural life include lower taxes and other costs of living, free access to outdoor recreation, unreported supplements to family incomes from small agricultural and woodlot operations, income and dietary supplements from hunting and fishing and gathering, and unreported income from day labor and work sharing among neighbors. Such economic benefits should be considered when assessing the relative prosperity of rural counties. The populations of these rural counties are somewhat more prosperous than they appear in the statistics.

Another economic factor to evaluate in assessing the prosperity of the rural counties is the importance of construction and other seasonal employment. Anyone who has lived in southwestern Indiana for very long understands that unemployment is seasonally low during the construction and harvest seasons and that unemployed construction workers commonly have unreported income during the off season. For this reason, it is important to consider seasonal unemployment lows as important economic indicators, in addition to average annual unemployment. The DEIS fails to utilize such unemployment data.

Simple population growth and business expansion statistics are by themselves inadequate indicators of the economic well-being of people in the four rural counties the highway will cross. Primary reliance on these two statistics by the DEIS is certainly not the integrated interdisciplinary use of the social sciences that NEPA requires. A closer look at the four rural counties the highway will cross is required.

When we look more closely at profiles of the four rural counties that are supposed to receive economic benefits from the project, we see that Gibson and Daviess Counties are actually doing remarkably well. Pike has high seasonal unemployment but an amazingly high average wage. Pike and Greene Counties both suffer from a downsizing coal mining industry. But both have booming neighboring economies with worker shortages in Dubois and Monroe Counties. All four

rural counties have lower poverty rates than fast-growing Monroe County. All four counties have economic advantages that should be exploited, including agriculture and forestry, existing highways, and neighboring areas of high employment. In all four counties, economic improvement is well under way without an expensive economic development program in the form of a new freeway.

Gibson County has a prosperous agricultural economy and per capita personal income levels higher than the Bloomington MSA (Monroe County). Real per capita income increased 2.8% between 1987 and 992. Gibson County's employed workforce increased nearly 24% between 1986 and 1992, compared to less than 15% statewide. Gibson County's annual payroll increased 24.2% in the same period, compared to a 7% increase statewide. Gibson County has four-lane highway (US 41) and major rail connections, and has recently attracted a very large Toyota plant. Gibson County workers also have ready access to employment in the nearby Evansville MSA, where average annual unemployment was only 3.2 in 1995. Gibson County is hardly in need of an expensive government-financed economic development rescue program in the shape of a new freeway.

Daviess County has an unusually intensive farm economy, with 382 farms earning receipts of $118,714,000 annually, an average of $1,653 per acre, compared to $342 per acre statewide. The number of businesses in Daviess County has increased by 49% since 1959, and by 3.3% between 1986 and 1991. The employed workforce increased by 42.4% between 1986 and 1991, compared to a 14.9% increase statewide. Annual payroll increased by 40.7% in the same period compared to a 7% increase statewide. Real per capita personal income increased 3.5% between 1987 and 1992. Average annual unemployment is at or below State levels, and seasonal unemployment lows are well below State levels. US 50 is a four-lane divided highway part way to divided four-lane US 40 at Vincennes, with completion planned in the near future. Daviess County is hardly in need of an expensive government-financed economic development rescue program in the shape of a new freeway.

Pike County, experiencing downsizing in its coal mining industry, is losing population and payroll and has average annual unemployment rates about two percentage points above the State average, with seasonal lows comparable to the State. Average numbers of unemployed are actually rather small – 435 people in 1995. Pike County workers have access to employment in neighboring Dubois County, where there is a shortage of workers in all industries and average annual unemployment was only 3.2% in 1995. In fact, Dubois County industries are actively recruiting immigrant workers from elsewhere, including Mexico and the southwestern US. Pike County had a remarkably high wage rate of $26,595 per job in 1992, 16% higher than the State average. Real wages increased by 1% between 1987 and 1992. The more intensive agriculture of Dubois County is beginning to develop in Pike County. It is not clear that Pike County is desperately in need of an expensive government-financed economic development rescue program in the shape of a new freeway.

Greene County's population has grown 8% since 1990, according to the US Census Bureau. Greene County has high unemployment levels, but workers have access to employment in the neighboring Bloomington MSA, where average annual unemployment was only 3.4% in 1995. The employed workforce increased by 43.3% between 1986 and 1991, compared to a 14.9% increase statewide. Annual payroll increased by 18.8% in the same period compared to a 7% increase statewide. Per capita personal increased by 7.3% between 1987 and 1992. Greene County has no four-lane highway, but US 41 is closer to its declining manufacturing center,

Linton, than the proposed new highway will be. It is not clear that Greene County is desperately in need of an expensive government-financed economic development rescue program in the shape of a new freeway.

Statistics for these county profiles are from 1995 edition of *The Indiana Fact Book* and from data sheets supplied by the Indiana Division of Workforce Development.

(2) The DEIS gets much of its demographic and economic information from the 1990 *SIHFS* and the 1992 edition of *The Indiana Fact Book*, although a 1995 edition is available. Information in the older edition is no later than 1985;1989, or 1990. Analysis of the regional economic environment and impacts, taken from the *SIHFS* and updated by Cambridge Systematics is not terribly useful in understanding the economic situation in the counties directly affected by the highway and for understanding how the highway will help them. Since the need for the highway depends on economic development in four specific counties, these counties should be studied in some depth. But they are distributed through three regions. Gibson County is included with three other counties, including the Evansville MSA. Greene County is included with four other counties, including the Bloomington MSA. Thus it is impossible to tell from the DEIS what benefits accrue to the particular target counties. This is certainly not high quality information. Changes in average per capita income and wages per job are not evaluated. Also ignored are mid-decade data from the US Census Bureau showing that Indiana's population is growing again, including the populations of all the counties in the project area. Also ignored is information that the State and the area are enjoying an economic boom, with low unemployment and worker shortages. Benefits to the rural southwestern counties from these developments must be evaluated.

(3) Although the primary justification for the highway is economic benefits to rural counties, two thirds of the benefits of the project accrue to the two ends of the highway, Regions 1 and 5, including the Evansville and Bloomington MSAs (DEIS A6-5), areas of low unemployment, with job growth projected at 40% in Monroe County even if the highway is not built. (DEIS 134) How much of this two-thirds accrues to Gibson and Greene Counties is impossible to tell from the information presented.

Only 7.8% of employment benefits go to the three-county region that includes Pike and Daviess Counties. (DEIS A6-7) This is a shockingly small benefit for rural counties whose development justifies the project – 344 jobs over 30 years, 115 jobs per county, 3.8 new jobs per county per year over 30 years. Historical trends indicate that jobs in the same region will grow by 15% by the year 2020 without the highway. This background increase of 5,496 jobs is nearly 1600% of the new jobs created by the highway. Moreover, 87 of the 344 new jobs, 25%, will be in the low-paying tourism sector. (DEIS 138) Thus it seems that the highway's economic development benefits to rural counties is trivial. Yet these trivial benefits are the primary justification for building the highway. In fact, job creation benefits are trivial in all regions compared to background growth. Without the highway, 82,992 jobs will be created in the 5 southwestern regions by the year 2020. (DEIS 130-34) This is 21.7 times the 3,830 jobs that will be created by the highway in the 5 regions by the year 2034 . (DEIS 138)

This trivial employment impact is another way of understanding the economic development share of the 1.54 benefit/cost ratio the DEIS claims for the highway. Unfortunately, the DEIS does not offer such analysis itself, but is content to mislead by claiming benefits without pointing out how trivial they are.

I.B. COSTS

The DEIS has not completed the required cost analyses. The benefit/cost ratio would undoubtedly be much lower if the DEIS included costs that it has ignored or undervalued. Two kinds of costs are inadequately treated. (1) Primary and secondary costs of acquisition, construction and mitigation. (2) Economic losses, or disbenefits, from the loss of industrial activities caused by construction of the highway. Disbenefits are not calculated in the DEIS. Disbenefits resulting from indirect land use change are not calculable in the DEIS since indirect land use change acreages are not given. These indirect land use change acreages must be calculated. Total costs, including economic disbenefits, should be totalled and included in the benefit/cost equation.

(1) Costs of acquisition, construction and mitigation:

Residual Value: We understand that the DEIS subtracts high residual values from the costs of acquisition and construction, including 100% of the value of real estate. We do not believe that it is legitimate to subtract residual values from costs. We request that our comments be submitted to the General Accounting Office for a ruling. If this is legitimate accounting, it would mean that the cost of any public project would initially be zero, since value received would be equal to cost. Thereafter, cost would increase annually, depending on depreciation rates. Is this the way Congress calculates the cost to taxpayers of its purchases? Figuring the residual value of real estate at 100% is especially illegitimate because the land is worth much less in resale value after it has had a highway built on it and experienced decades of pollution from traffic and maintenance. Finally, does Congress calculate costs of its projects by annually discounting the undepreciated residual value of property the government has acquired? Surely any residual value, if it is allowed at all, must be calculated as a benefit discounted after 30 years, not simply subtracted from initial expenditures. The GAO's response to these issues should be included in the DEIS and the benefit/cost ratio recalculated accordingly.

Mineral Losses: Ignored costs include the costs of paying for the mineral resources that the highway will take or render unextractable. The cost of paying for limestone resources under the ROW and too close to the ROW to mine are not finally calculated. The value of limestone should be calculated on all ownerships, not just mining company lands, since all owners will lose the salable value of their limestone resource, and can ask for compensation if their land is condemned. The value of coal underlying all ownerships under and too close to the ROW to mine must also be evaluated. The value of all natural gas and oil wells under and along the ROW must also be determined. Production of gas from the New Albany shale, which underlies much of the ROW, is increasing rapidly in southwestern Indiana. All these mineral losses must be added to the cost of the highway.

Mitigation for Forest Loss: The DEIS only promises to *consider* mitigation for forest loss at a rate of 3:1. This mitigation recommendation by IDNR should be followed and its costs evaluated. Unless INDOT plans follow up maintenance of tree plantings with herbicide treatments, 1200 trees should be planted to the acre rather than the 500 mentioned in mitigation item # 13. (DEIS 219)

Noise Mitigation: The cost of noise barriers in areas likely to exceed Federal standards of 67 decibels should be added to the cost of the highway -- see discussion of noise impacts in Section III of this comment.

Visual Impacts: The DEIS (157) makes no decision about the National Park Service's recommendation for large rest areas with wildflower plantings on shoulders, median, and interchange vegetative islands. The DEIS should calculate the cost of implementing these recommendations and incorporate them in the plan. Leaving the decision until later is merely an attempt to hide costs to achieve a favorable benefit/cost ratio.

Hazardous Waste: The results of a detailed investigation of the junk site near First Creek should have been included in the DEIS. The Phase I audit for asbestos and other hazardous materials in buildings to be removed from the ROW should also have been included in the DEIS (157-58). These studies will undoubtedly result in additions to the highway's construction costs.

Construction in Karst: It appears that the karst study for the DEIS is incomplete (DEIS G-1). The study should be completed and results revealed in the DEIS, including full costs of mitigation, testing, and monitoring determined by what the DEIS calls "Phase II evaluation." An accurate benefit/cost ratio cannot be calculated without these results. Hydrologic changes resulting from diversion or filling or compression of underground channels by highway construction must be calculated and the costs of mitigation displayed. It is not satisfactory to wait until major catastrophic impacts are revealed by subsidence and flooding (DEIS G 4-2). Thorough studies should be conducted for the DEIS by a nationally respected firm such as Ozark Underground Laboratories. Any residual risk beyond impacts that can be certainly predicted and mitigated should be estimated as part of the secondary cost of construction. These impacts should include the probability of water contamination by PCBs and other hazardous substances caused by hydrological impacts of construction. Such impacts must be calculated for secondary improvements necessitated by the project. The PCBs buried under and around the SR 37/SR 46 intersection require especially thorough consideration.

Road Closings: Limited access to the new highway will mean that local drivers may have to drive half the length of their county to cross the highway. More than about 50 County roads will be closed or deadended as a result of the project (DEIS Table 26). The cost of building frontage roads and other connections between county roads as a result of the highway project must be calculated as secondary impacts of the project and included in the benefit/cost analysis.

SR 37 North of Bloomington: Should upgrading SR 37 from the northern terminus of the highway to Indianapolis be determined not to be an illegitimate segmentation (see Part II.A of this comment), then it must also be evaluated as a secondary impact of the highway project. As such its costs must be evaluated and calculated as part of the benefit/cost equation.

(2) Economic Disbenefits:

Road Closings: Limited access to the new highway will mean that local drivers, including school buses and emergency response vehicles, may have to drive half the length of their county and back to cross the highway. More than about 50 County roads will be closed or deadended as a result of the project (DEIS Table 26). The additional travel time and costs caused by these closures should be calculated as economic disbenefits and added to the benefit/cost equation.

Agricultural Losses: The DEIS calculates annual crop loss from direct land conversion at $808,200, using average sale prices for 1992-1993. Current prices, however, are

considerably higher and future prices are expected to be higher yet. International analysts suggest that grain price increases are likely to continue as demand increases and farmland conversion proceeds in developing countries — for example, China's grain import demand will soon equal the entire world export supply, according to Worldwatch Institute. Climate change is also predicted to continue to disrupt grain production with storms, droughts and floods.

Moreover, total farm income losses, not just crop losses, should be calculated. Dividing total farm receipts for each county by the number of farmed acres in the county will give the income per acre per county. This figure can then be multiplied by the number of acres of farmland that the highway will take in that county. Farm income in 1992 in Daviess County was $1653/acre, in Gibson $361/acre, in Greene $201/acre, in Monroe $159/acre, in Pike $290/acre (Indiana Factbook 1995).

For every dollar received by farmers, up to $5 are earned by related local businesses (*Is Farmland Protection a Community Investment?* American Farmland Trust, 1993). Farm income losses per year should be recalculated using contemporary prices for grain or, better yet, average income per acre, and a 500% multiplier for the local economy.

Annual farm losses from indirect conversion of farmland must also be calculated. Indirect conversion will occur when farms or portions of farms cut off by the freeway become unfarmable. Indirect losses also occur as a result of population growth and the economic development of farmland for residential, commercial, and infrastructure uses.

Total direct and indirect farm income losses should be calculated over the life of the freeway, including the construction phase. These losses should then be counted as economic disbenefits of the freeway and subtracted from the economic benefits.

Timber Losses: The DEIS does not calculate timber value losses. The DEIS seems to be unaware that trees have economic value and that there is a timber industry in the project area. Direct losses will occur on up to 1,049 acres of forestland. Timber is a long-term crop, so it is difficult to estimate annual crop losses. Since most if not all of the timber on the ROW will grow to harvestable size over the life of the highway, it is appropriate to calculate the value of all trees on the ROW at their value at maturity. Median stand age in the Knobs Forest Survey Unit (including Monroe County) was about 55 years in 1986, and median stand age in the Lower Wabash Forest Survey Unit (including Greene, Daviess, Pike, and Gibson Counties) was about 50 years. (*Indiana Forest Statistics 1986* Table 24) Most of the timber on the ROW is in or near the Knobs Unit in Monroe and Greene Counties. Financial maturity averages from 60 to 120 years for different species of trees, so that median age is about 90 years. Thus all stands can be assumed reach financial maturity by the end of the planning period life of the highway in 2034, when the 50-55 year old stands of 1986 will be 100-105 years old.

Timber values at maturity can be roughly calculated by multiplying the number of acres by the number of board feet per acre by the price per board foot and subtracting the cost of timber management. In the Highland Rim and Shawnee Hills natural regions, the number of board feet per acre in a 90 year old stand averages 13,809 International Rule (Hoosier National Forest Planning Document, 1989), or 9,666 Doyle Rule, by which timber is sold in Indiana. Timber values in 1994 were $0.38/bf for an average stand and $0.56/bf for a quality stand. Timber values in 1995 were $0.35/bf for an average stand and $0.49/bf for a quality stand. (William Hoover, Purdue U. Dept. of Forestry, "Indiana Timber Price Index Update," *The Woodland*

Steward Summer 1995) Indiana's IDNR Division of Forestry estimates the present average value of mature timber at $0.40 (Letter from IN State Forester to Bob Klawitter 7 July 1993). Real timber prices are rising at about 1% per year over the long term, so that the value of timber in 35 years would be $0.57803 and management costs would be a one time timber stand improvement expense of $45 (Letter from IN State Forester to Bob Klawitter 7 July 1993).

Using these values, the value of timber on the ROW at maturity is 1,049 acres x 9,666 bf/acre x 0.57803 $/bf = $5,861,215 -(45 $/acre management x 1,049 acres = $47,205) = $5,814,010.

Dr. William Hoover, Professor of Forest Economics at Purdue University,demonstrates that each dollar of timber sold on the stump in Indiana generates $8 of additional economic activity (*Growing Indiana's Wood Products Manufacturing Industry,* Indiana Economic Development Council, 1993). Thus the $5,814,010 value of timber sold on the stump at maturity would be worth $46,512,080 to the local economy.

Timber crop losses from indirect conversion of forestland must also be calculated. Indirect losses will occur as a result of population growth and the economic development of forestland for residential, commercial, and infrastructure uses.

Total direct and indirect timber crop losses should be calculated as economic disbenefits over the life of the highway, including the construction phase. These losses should then be subtracted from the economic benefits of the highway.

Traffic Impact on rural SW Indiana:

The cost of negative economic development (disbenefits) resulting from diversion of traffic flow within the project regions, as well as to the rest of the State, must be evaluated.

By analyzing economic impacts only within multicounty regions, the DEIS fails to take into account the transfer from one area to another of economic development potential associated with increased or decreased traffic flow. The DEIS does not analyze current and projected traffic flows under different scenarios across the broad corridor from US 41/I-70 on the west to I-65 on the east. This is another major informational defect in the DEIS. However, the *Corridor 18 Feasibility Study* (1955) does contain such analysis in its Travel Demand Exhibits (4-37, 4-44,45). By comparing traffic flows analyzed across cut lines in the *Corridor 18* Study, one can see how much traffic volume along the new freeway will increase at the expense of traffic volume along other routes.

Traffic Impact on Vincennes: If the proposed rural freeway is built, traffic on US 41 south of Vincennes in the year 2015 will decrease by 900 vehicles/day from current use (-8%). If the rural freeway is not built, traffic south of Vincennes will increase by 5,400 vehicles/day (+50%). The net traffic loss by 2015 if the rural freeway is built will be 6,300 v/d (60%) If freeway traffic were routed along US 41 instead of SR 57, traffic on US 41 in the year 2015 would increase by 18,956 vehicles/day (+176%). [25,100 v/d projected for Corridor 18 interstate + 9,900 v/d residual traffic on US 41 -92% of current traffic on SR 57 (the % of traffic that would remain on US 41 if SR 57 becomes the Corridor 18 interstate)] The net traffic loss to Vincennes from building the rural freeway instead of the US 41 freeway

would be 19,800 v/d.

Traffic Impact on Terre Haute: Traffic coming north from Vincennes would decrease, approximately as indicated in the Impact on Vincennes, since the rural freeway would replace US 41/I-70 as the main route from Evansville to Indianapolis. If the proposed rural freeway is built, traffic on US 41 north of Terre Haute in the year 2015 will increase by 500 vehicles/day from current use (+10%). If the rural interstate is not built, traffic will increase north of Terre Haute by 2400 V/day (+49%). Net traffic loss north of Terre Haute would be 1900 v/d if the rural freeway is built, or more if some of the new traffic on US 41 south of Terre Haute continues north on US 41, as it surely will.

Traffic Impact on Jasper and Huntingburg: If the rural freeway is built, traffic on US 231will increase by 2,000 v/d (31%). If the rural freeway is not built, traffic will increase by 3,000 v/d (47%). This net traffic loss of 1,000 v/d (33% of the traffic increase by 2015) is especially important to Huntingburg, which is promoting itself as a tourist destination.

These massive transfers of traffic and associated economic development are not displayed in the DEIS. From the more limited traffic volume analysis in the DEIS (15), traffic and development impacts can be calculated, though they are not calculated in the DEIS:

Traffic Impact on Huntingburg: If the rural freeway is built, traffic will increase on US 231 between I-64 and SR 64 by 2,000 v/d (26%). If the rural freeway is not built, traffic will increase by 3,600 v/d (46%). The net traffic loss to Huntingburg will be 1,600 v/d (-20%) if the rural freeway is built.

Traffic Impact on SR 57: By the year 2020, SR 57 is predicted to lose 71% of its present traffic in Gibson County, 28% in Pike County, and 56% IN Daviess and Greene Counties. 78 existing businesses will suffer from this traffic diversion. (DEIS 15) According to traffic flow data in the *Corridor 18* Study, traffic will increase on SR 57 from 5,700 V/day to 8,900 V/day by the year 2015 if the rural freeway is not built (+56%). Traffic on the freeway replacing SR 57 will be 25,100 V/day by the year 2015 (+440%).

Traffic diversions from US 41, US 231, and SR 57 will result in losses to existing businesses, losses in future economic development, and losses in property value. These lost opportunities (robbing Peter to pay Paul) must be counted as economic disbenefits and subtracted from the benefits gained along the rural freeway in order to calculate an accurate benefit/cost ratio.

The idea that jobs "created" by the new freeway are actually jobs lost elsewhere should come as no surprise. Three recent studies, two of them proposing the same new highway construction in rural Southwestern Indiana, all admit that jobs generated by the new highway are not jobs added to the national workforce by the highway, but jobs relocated from elsewhere.

The ***Southwest Indiana Highway Feasibility Study*** (1990) determined that an Evansville to Indianapolis freeway would create 371 jobs in Southwest Indiana in 20 years by business expansion, 1200 by business attraction, and 564 by tourism. The highway would also cause 404 tourism jobs to be lost elsewhere in the State. The 1200 business attraction jobs would also be jobs not located elsewhere. Thus 3/4 of these jobs would be relocated rather than new jobs.

The Mid-Continent Highway (I-69) (1992) was commissioned by The Southwest Indiana Regional Highway Commission: "a good portion of the economic impact involves firms relocating to a new better location--overall demand and output for the nation is only marginally affected." Again, " the redistribution of employment that can result from the construction of a new transportation system may be desirable, even if it comes at some expense to areas where those jobs might otherwise be located." (4-5) Desirable, of course, only from the point of view of developers in the highway corridor.

Corridor 18 Feasibility Study (1995): "Most of these economic development gains within the corridor area will be due to helping the corridor to develop economically at the expense of other places in the U.S. ... firms may choose to locate in the primary impact area, because of Corridor 18, rather than to relocate elsewhere in the U.S. Such an impact will benefit the Corridor 18 primary impact area, but at a loss to other U.S. locations external to the primary impact area." (7-3) Both Improved Competitive Position and Growth in Businesses Serving Travelers "transfer income and property value to owners of land and businesses along the improved corridor. Corresponding losses will occur at other places where this economic activity otherwise would have been located." (5-4)

The Hudson Institute's ***The Future of Southern Rural Indiana*** (1991) suggests a darker side to this job relocation shell game, involving the promotion of urban decay, wage suppression and social injustice. ***The Future of Southern Rural Indiana*** speculates that "the United States could see another round of industrial migration to rural areas to rival that of the 1960s and 70s," and describes "the attractions of rural locations for many kinds of enterprise" ; "The costs of doing business are generally lower outside cities than within them, in almost all expense categories. ...Workers in rural areas are less likely to be unionized" and more likely to be better workers than their urban counterparts. (26) Besides offering cheaper, nonunion labor, how else is the rural workforce better than the urban? Southwest Indiana's rural workforce is poorly educated: "Fewer than two-thirds of the region's people were high school graduates in 1980 as against three-fourths of the nation's white population, and only one in ten had a college degree as against one in five nationally" (iv).

Nor is the rural workforce larger. According to the Hudson Institute study, "Much of the potential for economic growth in the nation's rural areas depends on ... the location or relocation of economic interests to areas where workers are available. . . . Significant numbers of workers may become available in rural labor markets." (24) This assertion is contradicted by low unemployment in the highway corridor as a whole and by the small actual numbers of unemployed in sparsely populated rural counties. Neighboring Dubois County, with near full employment, provides manufacturing jobs for surrounding rural counties, and has had to begin importing Mexican workers. In fact, the availability and reliability of rural workers in Southern Indiana has been called into question recently even in high unemployment areas. In Orange County, for example, with one of the highest unemployment rates in the State, industrial representatives complain that they can't find enough workers, and that turnover and absenteeism are high.

The DEIS should recognize that declining real wages are a serious threat to prosperity in southwestern Indiana (Morton Marcus, Director, Indiana Business Research Center, ***Southern Indiana A Statistical Profile,*** Presented to the Joint Economic Committee of the U.S. Congress, New Albany IN, April 24, 1994). The role of transportation infrastructure

improvements like the proposed new highway in encouraging the relocation of industry and industrial workforces into rural areas should be recognized as a mechanism contributing to declining real wages, and counted as a cost of the project. Real wages are depressed by moving industry out of unionized urban areas and increasing the workforce of nonunion rural areas. Increased business location and increases in population in these rural counties should be considered cumulative impacts together with forces that are moving real wages downward in these counties and statewide. Real wages per job declined between 1986 and 1991 by 1.2% in Daviess County, by 6.5 % in Monroe County, by 8.8% in Greene County, by 22.3% in Pike County, and by 6.9% statewide (*Indiana Factbook* 1995).

Another reason for building a rural highway is to enable industries to relocate from cities like Evansville, where environmental permits are hard to get, to less polluted rural areas. It is now becoming clear that Toyota has located in Gibson County instead of in Evansville because the massive air pollution from Toyota's plant could never be permitted in Evansville. Thus Evansville suffers job losses and pollution is spread out around the countryside.

This highway will hurt Evansville by encouraging businesses to locate where land is cheaper, unions weaker, wages lower, and pollution permits easier to get. These costs to the people of Evansville and other cities should be included in the cost benefit analysis. Such concerns may be difficult to quantify, but they should be considered, qualifying the intemperate optimism of the DEIS.

II. SCOPE

The DEIS is inadequate in scope because it analyzes only a part of the total project and because it does not analyze a reasonable range of alternatives.

II. A. SEGMENTATION

In *NEPA Law and Litigation* (September 1995), Daniel R. Mandelker describes "The Segmentation Problem" in the scope of an EIS: "Federal agencies may plan a number of related actions but may decide to prepare impact statements on each action individually rather than prepare an impact statement on the entire group. This decision creates a 'segmentation' or 'piecemealing' problem. A common example is a highway planned to connect two cities which the highway agency divides into two segments. It then prepares an impact statement covering only the first segment.... In the segmentation cases, the courts must decide whether a federal action on which an impact statement has been prepared has been improperly segmented from other related actions that should have been considered as part of the same action." (§9.04[1])

CEQ regulations implementing NEPA require that "Proposals or parts of proposals which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impact statement." [40 CFR §1502.4(a)]

Further CEQ regulations require that "to determine the scope of environmental impact statements, agencies shall consider . . . actions which automatically trigger other actions," actions which "Are interdependent parts of a larger action and depend on the larger action for their justification," "cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement, " and "Similar actions, which when viewed with other reasonably foreseeable or

proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography." [40 CFR §1508.25(a)(1)(2)(3)]

In order to "ensure meaningful evaluation of alternatives and to avoid commitments to transportation improvements before they are evaluated," Federal Highway Administration regulations (1980) require that an action evaluated in an EIS

"(1) Connect logical termini and is of sufficient length to address environmental matters on a broad scope;

(2) Have independent utility or independent significance, i.e., be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made; and

(3) Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements." [23 CFR §771.111(f)]

Courts have also disapproved highway segmentation when the project evaluated was part of a planned larger project. (Mandelker §9.04[3][b])

The Southwest Indiana Highway Corridor DEIS appears to involve a classic case of segmentation. In Table 1: Highway Studies Pertinent to Action, the DEIS recognizes as its historical context 5 previous studies of the "Indianapolis to Evansville Corridor" between 1986 and 1990. The DEIS claims to be further study of Corridor A of the *Southwest Indiana Highway Feasibility Study* (*SIHFS* I, 1-2). Much of the information, about traffic flow and economic environment, for example, are taken directly from the *SIHFS*. The *SIHFS*, however, studied three corridors between Evansville and Indianapolis, including Corridor A. The DEIS chooses to analyze only the segment of Corridor A between Evansville and Bloomington. Thus, the DEIS recognizes that the project is a segment of a larger planned project. In fact, there is overwhelming evidence that the project was considered an Indianapolis to Evansville highway by INDOT as late as 1994, and that it is still universally understood by highway proponent organizations, the press, and the public to be part of an Indianapolis to Evansville highway, the extension of I-69 south from Indianapolis, and Corridor 18. The prohighway support group calls itself "Voices for I-69."

Bernardin-Lochmueller & Associates, consultants under contract to prepare an EIS for the project, submitted two reports dated November 18, 1993, for review to public agencies involved in Early Coordination: *Alternatives Analysis for Sections II and III for the Southwest Indiana Highway Indianapolis to Evansville* and *Endangered Species Technical Studies for the Southwest Indiana Highway Indianapolis to Evansville*. The project is referred to as the Indianapolis to Evansville Highway throughout these documents and in a cover letter accompanying these documents from Bernardin-Lochmueller to the Hoosier Environmental Council dated January 10, 1994. Correspondence between INDOT and Bernardin-Lochmueller and other parties confirm that the highway was being planned was part of an Evansville to Indianapolis highway until sometime in 1993 or 1994, when INDOT decided to begin referring only to a Bloomington to Evansville Highway. The DEIS concludes that improvement of SR 37 from Bloomington to Indianapolis "would need to be addressed in a separate corridor and environmental study" (DEIS 25).

The Bloomington to Evansville highway is not a reasonably usable project without further

transportation expenditures in the area. The DEIS admits that building the freeway only to Bloomington will result in serious deterioration of Level of Service between the northern terminus of the project, south of Bloomington, and Indianapolis:

"A detailed capacity analysis was conducted for the signalized intersections and the roadway for SR 37 between Bloomington and I-465 in Indianapolis.

"The analysis showed that the 'No-Build' option (not constructing the Southwest Indiana Highway) would result in 6 of the 12 signalized intersections operating at a deficient level of service (LOS E or F). If the Southwest Indiana Highway is constructed, 8 of the 12 signalized intersections would operate at a deficient level of service.

"For the mainline of SR 37, the 'No-Build' option would result in approximately 30% of SR 37 operating at a deficient level of service of F. Constructing the freeway would result in 85% of SR 37 operating at a deficient level of service of F."(DEIS viii) "A level of service of F means that traffic is backed up and motorists can expect long delays." (DEIS 17) Thus constructing the freeway would result in 55% more degradation of traffic service than not building the freeway.

The Bloomington Area Plan Commission requested that the project be continued up SR 37 to terminate north of Bloomington. "In response to this comment, although the project currently terminates on the south side of Bloomington, INDOT has planned improvements to SR 37 intersections at SR 45/46, Vernal Pike and Tapp Road. In each of these cases SR 37 will either be bridged or an interchange will be installed." (DEIS 22)

Furthermore, INDOT has constructed two interchanges to interstate standards on SR 37 in Bloomington north of the project terminus, at Second and Third Streets, in anticipation of the Evansville to Indianapolis project. Scheduling these interchanges in advance of the proposed project, a prior commitment of resources as part of a project whose planning was already underway, should not allow INDOT to avoid including them as costs of the preferred alternative. The prior commitment of resources during the NEPA process is expressly forbidden. (40 CFR §1506.1) Further, NEPA's requirement for cumulative impact analysis requires the DEIS to consider "the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions.... Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." (40 CFR §1508.7) The cumulative economic impacts of these previously constructed interchanges must be included in the DEIS for the proposed project.

Terminating the project on the south side of Bloomington is a transparent attempt to evade meaningful evaluation of alternatives and to commit the State and Federal governments to transportation improvements before they are evaluated, in contravention of FHWA regulations and in violation of NEPA. Ending the project south of Bloomington avoids including the cost of several bridges or interchanges and the cost of upgrading SR 37 north to Indianapolis. Including these costs, along with other costs that have been improperly omitted from the EIS, would have a major impact on the benefit/cost justification for the project. The cumulative impacts of these future actions must be evaluated, along with the impacts of past and present actions.

The SR 46 interchange is expected to be especially expensive and difficult because it involves the disturbing of buried hazardous waste, including PCBs. Evaluating the costs and environmental impacts of building this interchange alone will seriously impact the cost and the

feasibility of the preferred alternative. Yet construction of this interchange, already in planning stages, is part of the whole Indianapolis to Evansville highway and is certainly triggered by construction of the preferred alternative, as one of the interchanges that must be built to maintain acceptable levels of service on SR 37 and to connect the Interstate to Indianapolis. Case law is very consistent in forbidding highway segmentation to avoid evaluating impacts on environmentally sensitive sites (Mandelker §9.04[3][b]). Even if considered as a secondary impact, or separate future action, the cumulative impacts of this interchange must be evaluated, along with the impacts of past and present actions.

Terminating the project south of Bloomington also avoids the environmentally sensitive Indianapolis metropolitan area, a Maintenance area for ozone pollution. Additional sources of ozone, such as increased traffic from this project, could put Indianapolis back into the Nonattainment category.

Furthermore, the terminus south of Bloomington commits the State and Federal governments to eventually build another segment of freeway between Bloomington and Indianapolis, and thus avoids the consideration of alternative routes between Evansville and Indianapolis, such as US 41/I-70, which would have to be considered if the Evansville to Indianapolis Highway were evaluated as a whole.

INDOT's attempt to change the scope of this project in midstudy is an attempt to violate the purpose of NEPA, whose "procedures must insure that environmental action is available to public officials and citizens before decisions are made and before actions are taken" [40 CFR §1500.1(b); cp. §1502.2(f) and §1506.1(a)]. Further evidence that INDOT has prejudged the result of the DEIS is its issuance of a Professional Services Bulletin on May 29, 1996, calling for bids for design and engineering work for the preferred alternative.

II.B. ALTERNATIVES

CEQ's NEPA regulations consider alternatives analysis "the heart of the Environmental Impact Statement.... sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public. In this section agencies shall:
(a) Rigorously explore and objectively evaluate all reasonable alternatives....
(b) Devote substantial treatment to each alternative....
(c) Include reasonable alternatives not within the jurisdiction of the lead agency." [40 CFR §1501.14(a)(c)]

The DEIS's alternatives analysis is seriously defective, offering the public and the decisionmaker only route-alignment choices in a narrow corridor. The DEIS fails to offer clear choices even here, since it does not choose between Options 1 and 2 of the preferred alternative. The No-build alternative is dismissed in less than half of a page. Other reasonable alternatives are not considered, because the State and its consultant have prejudicially decided in advance of the study in favor of a new rural freeway paralleling SR 57 and SR 45.

Benefits, costs, and environmental impacts for the No-build alternative must be fully evaluated.

(1) **Nontransportation-based Rural Economic Development:** Since the need for the project is primarily rural economic development, the DEIS should consider an economic development alternative that is not primarily transportation based, though improvement to

local roads would play a role. This is a reasonable alternative not within the jurisdiction of the lead agency. Such an alternative should consider the extensive planning literature concerned with the prosperity of small towns and rural areas. Much of this literature recommends promoting indigenous industry. In the southwestern Indiana project area, indigenous industries include agriculture and the wood products industry. Jasper is a good example of a community that has prospered vigorously by promoting value-added industries (furniture and meat and poultry processing) to its agricultural and forest base. There is no four-lane road in Dubois County, and Jasper is about 16 miles from I-64 -- about the distance from the largest small towns of the SR 57 corridor to four-lane US 41."

This alternative might encourage the successful and sustainable family farms of the area and related farm service and supply businesses. Family farming is still important in the five counties the highway would transect. Their farms have annual cash receipts of $282 million (*Indiana Factbook* 1995). For every dollar received by farmers, up to $5 are earned by related local businesses, or $1,410 million (*Is Farmland Protection a Community Investment?* American Farmland Trust, 1993). This alternative would also encourage timber production, to which local soils are well suited. Professor William Hoover, Purdue University Forest economist, has demonstrated that every dollar's worth of timber harvested multiplies 8 times in value added as it cycles through the economy. The counties in the corridor are >30% forested, including 578,100 acres, producing nearly 47 million board feet of timber, worth about $13,152,440, every year, generating $105,216,000 in additional economic activity. (Calculated from *Indiana Forest Statistics, 1986* and from *Growing Indiana's Wood Products Manufacturing Industry*, Indiana Economic Development Council, 1993) Agriculture and forestry require good short haul local roads to mills, elevators, and barge and rail terminals. Thus, this is an intermodal alternative, and railroad transportation should be encouraged.

Pike County is a good example of a county whose sustainable agricultural and forest economy has been damaged by unsustainable development. Once as prosperous as Dubois County, much of Pike County's farm and forestland was destroyed by coal mining. Pike County lost 19% of its farms between 1987 and 1992. Its farm service and supply businesses collapsed, wood industries never developed, and population has declined. Coal mining jobs declined by nearly 40% in Pike County in the 1980s. A nontransportation prescription for Pike County could include agricultural reclamation and reforestation, financed in part by taxes on the coal mining industry. Already, more intensive agriculture is spreading into Pike County from neighboring Dubois County.

In Greene County, residential development and population growth is occurring, especially in the eastern part of the County neighboring the Bloomington MSA. Eastern Greene County appears to be turning into a low cost housing development for workers who spend their money in Monroe County. This kind of development will reduce the tax base of the county relative to demand for services, leaving fewer resources for economic rehabilitation. The nontransportation alternative could look at ways of discouraging such urban sprawl, by eliminating infrastructure subsidies to leapfrog subdivisions, for example, and by encouraging agriculture to become more intensive and value added.

These comments are not meant to be exhaustive, only illustrative of the kinds of things that might be considered in such an alternative.

(2) US 41/I-70: Upgrading US 41 to freeway standards is summarily dismissed because it would not bring economic development to Pike, Daviess, and Greene Counties. The economic studies have not been done, however, to demonstrate this. In fact, the larger cities in these counties are as close to US 42 as Jasper is to I-64, and Jasper is one of the fastest growing economic centers in Indiana.

But the US 4/I-70 alternative is not evaluated primarily because the study has been limited to an Evansville to Bloomington freeway. The State's predetermination to build a new terrain rural freeway kept this alternative from being considered even by Donohue's *SIHFS*. But the proposed rural freeway is only a segment of the larger Evansville to Indianapolis highway, and the US 41/I-70 alternative is a reasonable alternative which must be fully evaluated, including its regional economic impacts.

This alternative, using the existing roadway, would have very few negative environmental impacts compared to the SR 57 corridor. It would contribute to strengthening the economies of Princeton, Vincennes, and Terre Haute and would improve southwestern Indiana's access to the Chicago area via SR 63. Building this alternative also leaves open the option, proposed by State Senator Tom Weatherwax, of extending I-69 from Fort Wayne to Lafayette to Terre Haute.

This alternative would be much cheaper to build than the DEIS's preferred alternative. The *SIHFS* study estimates $285 million in 1989 dollars (Table 2.9). A bypass linking US 231 to I-70 southeast of Terre Haute is already in the planning stage. This alternative should be buildable for $300 million in 1995 dollars, less than a third of the cost of the proposed project when the cost of upgrading SR 37 north of Bloomington terminus is included.

Given the financial constraints, upgrading US 41 is the only Evansville to Indianapolis freeway that Indiana is ever likely to get. According to Congressman Lee Hamilton, "A recent Department of Transportation report on the state of America's infrastructure concluded that we currently have a $17 billion annual shortfall in what we should be investing just to keep our transportation system in good working order." (Newsletter 29 May 1996) *Construction Digest* (September 25,1995) reports FHWA statistics showing 59% of the nation's major paved roads in poor or fair condition in 1993, requiring $212 in repair, and 34% of all bridges over 20 feet long needing rehabilitation or replacement, at a cost of $78 billion. The same report found 3,043 miles of urban highways and 14,022 miles of rural highways in poor or fair condition. 6,891 Indiana bridges (39%) were listed as structurally deficient or functionally obsolete.

The US 41/I-70 alternative better fulfills the intent of the Intermodal Surface Transportation Efficiency Act of 1991: "It is the policy of the United States to develop a National Intermodal Transportation System that is economically efficient and environmentally sound. . . . Practices that resulted in the lengthy and overly costly construction of the Interstate and Defense Highway System must be confronted and ceased." (Conference Report accompanying HR 2950 [ISTEA])

US 40/I-70 should be the preferred alternative.

(3) US 231/ SR 67: The Donohue study recommended building part of this alternative. Since then, INDOT has committed to building a divided four lane US 231 from the new bridge across the Ohio River near Owensburg KY north to I-64. A four-lane US 231 bypass around

Jasper and Huntingburg, recommended by a Rust study for INDOT would bring US 231 north almost to the East Fork bridge at Haysville. If the SR 57 corridor is worth reexamining, so is the US 231 corridor. This route would serve Greene, Daviess, and Martin Counties, including Crane Naval base.

(4) Passenger Rail: Since the rural economic develop benefits of the preferred alternative are so slight, the DEIS should fully evaluate passenger rail service. A feasibility study currently underway. USA Rail is proposing a commuter train route from Indianapolis between Terre Haute, Vincennes, Evansville, and Bloomington at a cost of $15,000 a mile for upgrading existing tracks or $1 million a mile for new high-speed lines. The DEIS should evaluate this alternative.

III. ENVIRONMENTAL IMPACTS

Noise Impacts (DEIS 152-4): The DEIS claims that only 58 residences will experience noise levels at or above the Federal maximum of 67 decibels for residential areas. However, the more detailed analyses of the three highway sections suggest that 177 residences and 4 cemeteries are likely to experience unacceptable noise levels when the positive margin of error is added in. 64.3 plus or minus 2.9 and 63.4 plus or minus 3 decibels indicate nose levels which could easily exceed Federal standards. Additional residential development of 2,336 units is expected as a result of economic activity generated by the highway. This is in addition to residential development generated by population increases that will take place whether or not the highway is built. Therefore, there is the potential for many more residences to be impacted by unacceptable noise levels. Noise barriers are said to be not cost effective in these rural areas. However, especially if the highway is built, these areas near the highway are going to become less rural and more suburban. Lawsuits by owners of residences opposed to the highway should be anticipated over the noise issue. The project should plan for noise barrier mitigation and not merely hope that "Slight adjustments to the facility profile and cross section during the design phase may satisfactorily reduce noise to a critical receiver."

Forest Impacts: Up to 1,049 acres of forest will be taken by the preferred alternative. The unevaluated US 41/I-70 alternative is superior in that it would require no deforestation at all.

The Survey of Forest Plots reports only the number of trees by species composition and by 4 size classes. Perhaps the point is to discount the impact because the forest surveyed is mostly young disturbed forest. "Forests in the study area are not 'old-growth woods' and have been timbered in the recent past" (DEIS 164). The presence of more young trees than old trees does not necessarily indicate a very young forest, however. Larger trees are naturally fewer in number in any forest than younger trees, because most of the younger trees are eliminated by competition as they get older.

Moreover, the DEIS's Survey of Forest Plots (Appendix K) has some serious flaws. "Each forest plot was selected by picking out the best representative of the forest region." But it is precisely in order to find out what is representative of the region that forest plots are established. This method of selecting plots can only reinforce the researcher's preconceptions. For this reason, forest survey plots conducted by the USDA Forest Service and IDNR are determined by a systematic grid. See Forest Statistics of Indiana 1986, pages 5-8 for proper survey procedures. The small number of plots surveyed makes the reliability of the survey dubious. The accuracy of forest plot surveys also decreases with the size of the area sampled.

USDA Forest Service inventories in Indiana report only county size areas or larger. Sampling an area of 1,049 acres with 11 nonrandom plots would have a very large percentage of error.

There is no doubt that these forestlands, like more than 99% of Indiana's forestlands, have been logged in the past and may be managed as timberlands today. They are nevertheless of great biological value to a state that has lost 87% of its forestland in the last 200 years.

Neotropical migrant birds, for example, many of which depend on large areas of contiguous forest, are declining at 3% per year, according to Partners in Flight, the international migratory bird conservation association. The DEIS recognizes that 358 acres in the ROW constitute core forest habitat, more than 100 meters from a forest edge, needed by these birds to breed successfully. Another 590 acres of core forest habitat will be converted to edge forest outside the ROW. (DEIS 164). This conversion of 948 acres is highly significant. The DEIS tries to minimize this impact by pointing out that "If 33% of the forestland in these counties were considered core habitat (using the percent found in the right-of-way for the Southwest Indiana Highway Corridor), the Preferred Alternative. . . would convert about 0.58% of the core habitat to either edge forest or other land use." But it is highly unlikely that 33% of the forestland in these counties is core habitat. The 200,000-acre Hoosier National Forest probably contains no more than 30,000 acres of core habitat, about 15%, and the HNF is much less fragmented than the privately owned forestlands of these counties. The truth is that the highway crosses unusually heavily forested areas with an unusual proportion of core habitat.

In Purdue University's *Forest Policy Issues in Indiana*, Dennis LeMaster, head of Purdue's Department of Forestry, and Lois Rans declare that forest fragmentation is one of the most important forest policy issues in Indiana. "Indiana's natural forests are fragmented due to agricultural, industrial, and urban development. Timber harvest units, roads, and powerline and pipeline corridors can also breakup forest areas. Forest fragmentation tends to reduce biological diversity.... Biological diversity is important for economic, ecological, intrinsic, esthetic and legal reasons." *Forest Policy Issues in Indiana* also identifies the highway under consideration here as another important forestry issue because it "could significantly reduce forest acreage in southwestern Indiana and increase forest fragmentation." LeMaster and Rans recommend constructing the highway on a route that minimizes a reduction in forest acreage." Fortunately, such a route is available -- the US 41/I-70 alternative that INDOT stubbornly refuses to consider.

ROW Revegetation: Mitigation measure # 2 should specify that revegetation consist of plants and plant communities native to the project area.

Farmland Impacts: In addition to the 1,049 acres of direct conversion of farmland, the DEIS should calculate indirect conversion by associated development. All these impacts, of course, could be avoided by selecting the US 41/I-70 alternative.

Karst Impacts: The karst study is incomplete and the temporary mitigation measures for erosion control are inadequate for construction in karst. It is essential to prevent silt from entering the cave systems during construction. Conventional silt trapping devices such as straw bales proved highly inadequate during construction of four-lane SR 37 south of US 50. Control devices frequently failed during storm events. Karst impacts, of course, could be avoided by selecting the US 41/I-70 alternative.

Wetland Impacts: The 31 acres of wetland impacts can be avoided altogether by selecting the US 41/I-70 alternative.

Threatened and Endangered Species: The ROW passes through habitat for two state rare fish, 10 federally endangered mussels and 2 species considered for listing, 5 federally endangered mammals and 2 state threatened and one state rare mammals, 5 federally endangered birds and 2 species considered for listing, 1 proposed federally threatened reptile and 7 state listed species, 1 state endangered amphibian and 1 state threatened and 1 state rare species. The botanical survey found 5 state listed species. The bat study actually captured two lactating female Endangered Indiana Bats, indicating a nearby maternity colony, and heard a State Endangered Evening Bat. The bats were located by Indiana's most famous mammal biologist and bat expert John Whittaker. Whittaker says bats hate interstate highways as much as he does (personal communication). This opinion is confirmed by Garner and Gardner's study "Determination of Summer Distribution and Habitat Utilization of the Indiana Bat (Myotis sodalis) in Illinois" (1992). Garner and Gardner found that lactating female Indiana bats maintain a mean distance of about a mile between themselves and paved highways. Garner and Gardner identify deforestation and road construction as reasons for the continuing decline of the Indiana Bat throughout its range.

It is not surprising that such limited surveys as were conducted found so few endangered species in the area. Such species are rare and hard to find. But the habitat for these species in the project area is significant. It is habitat destruction, after all, that endangers these species and hinders their recovery. Fortunately, an alternate route is available that will destroy no such habitat-- the US 41/I-70 alternative that INDOT stubbornly refuses to consider.

Air Impacts: Terminating the project south of Bloomington also avoids the environmentally sensitive Indianapolis metropolitan area, a Maintenance area for ozone pollution. Additional sources of ozone, such as increased traffic from this project could put Indianapolis back into the Nonattainment category.

Social Impacts: Social impacts include damage to 200 to 220 farms that the highway will cut across, more than 8% of the farms in the five impact counties. These are viable family farms that owners hope to pass on to their children and grandchildren. Some of them have been owned and operated continuously by the same family for over 100 years. The State of Indiana gives special recognition to such farms as Hoosier Homesteads. These farms, along with the timberlands that are mostly farmer-owned together constitute a sustained and sustainable rural economy. The purpose of this project is to promote economic development in southwestern Indiana, yet it does not recognize these farms as businesses producing significant economic returns. Family farming is still important in these counties. In 1992, their 2,877 farms had annual cash receipts of $282 million (*Indiana Factbook* 1995). For every dollar received by farmers, up to $5 are earned by related local businesses, or $1,410,000,000 (*Is Farmland Protection a Community Investment?* American Farmland Trust, 1993). By damaging 8% of the farms in these counties, thus making them slightly to completely economically unviable, the project damages the entire agricultural economy. Additional loss of farmland through development stimulated by the highway will remove still more land from the agricultural economy. These direct and indirect impacts must be considered as part of past and future cumulative damages that have been eroding family farms and that could eventually destroy the agricultural economies of these five counties. Daviess County lost 8.6% of its farms between 1987 and 1992, Gibson lost 14.9%, Greene lost 2.9%, Monroe lost 12.9%, and

Pike lost 19.1%. Statewide, 11% of all farms were lost in the same period. (*Indiana Factbook* 1995)

Farm impacts, together with the taking of 108 to 120 homes, 1 or 2 churches, and 4 businesses, together with economic disbenefits to 78 businesses along SR 57 caused by relocating traffic to the new freeway, would seriously disrupt local communities. Road closures and lack of local freeway crossings will create further disruption to these communities. The net effect of this freeway, if its economic development goals are realized, will be to force people off the land who are using it in less intensive ways and turn the land over to those who will use it more intensively. But "rural" is defined by less intensive land use. Thus the success of this project will mean the destruction of rural occupations and rural lifestyles and rural communities and the further displacement of rural people from the land. This disruption and destruction of rural America is part of a well-know and well-documented trend of cumulative impacts.

There are, in fact, not very many unemployed people in the impact counties that will be helped by the economic development proposed. Rural poverty and unemployment are partly a function of age, ill health, and disability in counties with aging populations. In fact, there are labor shortages in southwestern Indiana today. Employers in Dubois County are particularly desperate for workers, employing people from surrounding counties and encouraging immigration from the southwestern U.S. and Mexico. The myth of a large and superior rural workforce disguises a program for urban flight that sometimes appears to be partly racially motivated. "Despite the somewhat slower growth of the working-age population in rural southern Indiana than in the nation as a whole, . . . the southern Indiana work force is highly regarded for both its work ethic and its trainability -- a product of what we have called the 'cultural capital' of the region." In fact, evidence for this cultural capital is anecdotal and contradicted by the experience of employers in places like Orange County. It may turn out to be primarily the whiteness of the rural population. "Southern Indiana's black population remains, as it has always been, small." (*The Future of Southern Indiana*, iv)

Cumulative Impacts: Analysis should include the impacts of past, present and future INDOT and other development projects that have resulted in farmland, wetland, and forest loss and fragmentation in the project area and in Indiana. Land use and biological impacts of projects like this, both large and small, multiplied over many projects over many years are responsible for the continuing erosion of wild and rural Indiana, its forests, wetlands, farmland, wildlife, and water quality. In the absence of State policies, laws and regulations governing land use, transportation policy and projects effectively constitute State land use policy in Indiana. INDOT should maintain databases of the cumulative impacts of its projects, especially land use impacts, with the impacts of other private and public developments for inclusion in every EIS prepared that impacts rural lands, in order to satisfy NEPA's requirement for cumulative impact analysis.

CONCLUSION

The benefits projected for this highway project do not justify its negative environmental and social impacts. The benefit/cost ratio is barely adequate to justify the project on purely economic grounds. And the benefit/cost ratio would be much worse if all costs were accurately evaluated, including the direct and secondary construction costs, mitigation costs, and direct and indirect economic disbenefits. Moreover, this DEIS is inadequate in its failure to analyze the

entire scope of the project from Indianapolis to I-64, including a reasonable range of alternatives. Remedying all these defects would result in massive changes, and we believe, require the adoption of a different preferred alternative. Incorporating all these changes in a Final EIS would be inappropriate.

Because this DEIS is so inadequate as to preclude meaningful analysis, it should be withdrawn, amended, and recirculated [40 CFR §1502.9(a)]. Because the amendments required will be very extensive, including the full analysis of total costs and impacts for additional alternatives, the EIS should be recirculated in draft form in order to satisfy NEPA requirements for public involvement.

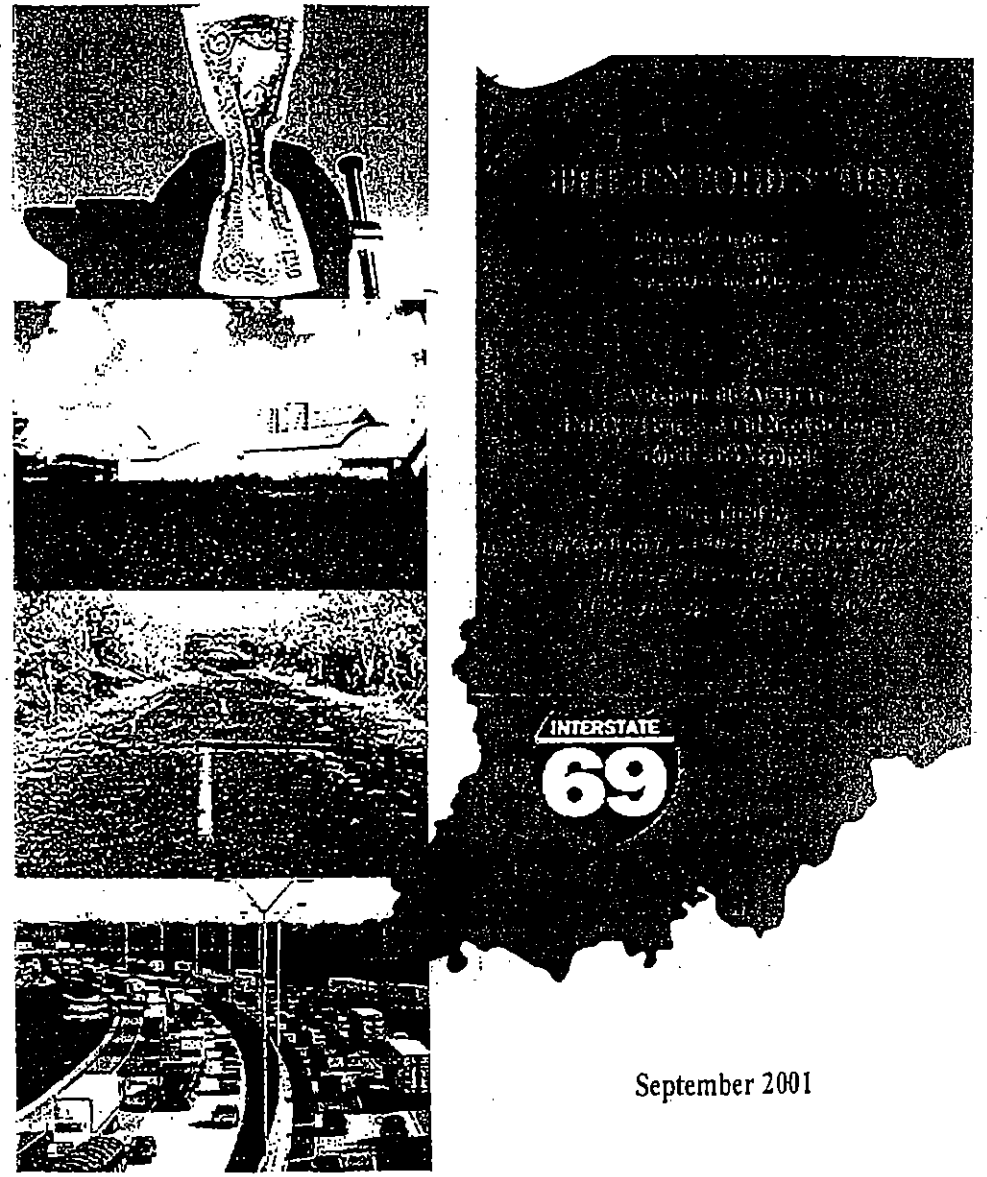
Respectfully Submitted by

Bob Klawitter
Executive Director

Attachment B

The Untold Story

1106-147



September 2001

This report and analysis of the Indiana Department of Transportation's (INDOT) draft Purpose and Need Statement for the I-69 highway project is submitted for inclusion in the administrative record by the Environmental Law and Policy Center (ELPC), the Hoosier Environmental Council (HEC), and Citizens for Appropriate Rural Roads (CARR). ELPC is the Midwest's leading public interest environmental advocacy and eco-business innovation organization. HEC is Indiana's largest environmental organization with over 25,000 members statewide; HEC advocates for government and business decisions that improve the State's environmental quality, conserve Indiana's natural heritage, and promote smart, sustainable growth. CARR, based in Southwest Indiana, is a grassroots organization working to protect the integrity of Indiana's farmlands, forestlands and rural communities by supporting fiscally conservative and environmentally sound transportation policies. This document was prepared with the assistance of Norman Marshall of Resource Systems Group, Inc., a national transportation and environmental consulting firm.

INTRODUCTION

The purpose and need statement occupies a critically important position in the decisionmaking process for a federal-aid highway project such as the Interstate 69 project. More than anything else, purpose and need dictates what alternatives are eliminated and what alternatives are carried forward for detailed study. The purpose and need statement must accurately and objectively identify the underlying needs for the project, and INDOT cannot state a purpose and need that only the State's preferred alternative can satisfy. Simmons v. U.S. Army Corps of Engineers, 120 F.3d 664, 670 (7th Cir. 1997).

Regrettably, INDOT's draft purpose and need statement (P&N Statement) for the I-69 project strongly reflects the institutional bias for an all-new highway that has controlled this project since its inception. Since an all-new highway cannot be justified simply for the purpose of connecting Indianapolis and Evansville -- the environmental and economic costs far outweigh the benefits -- INDOT has identified several broadly-stated purposes to better justify building an all-new highway. These purposes include "strengthening the transportation network in Southwest Indiana," and "improving opportunities for economic development in Southwestern Indiana." INDOT selected these purposes in 1999 before either evaluating actual conditions or requesting public comment.

Having chosen broad purposes for the I-69 project -- rather than simply focusing on improving the connection between Indianapolis and Evansville -- INDOT crafted a purpose and need statement that supports those purposes by falsely portraying Southwestern Indiana as an isolated and impoverished region with serious road safety problems. INDOT therefore has better positioned itself to be able to claim that an all-new highway will best alleviate these alleged conditions. This outcome-controlled "rigging" of purpose and need violates the National Environmental Policy Act (NEPA), which "does not give agencies license to fulfill their own prophecies, whatever the parochial impulses that drive them." Citizens Against Burlington, Inc. v. Busey, 938 F.2d 190, 195 (D.C. Cir. 1991). 2.3

Overshadowing the EIS process is Indiana Governor O'Bannon's strong and long-standing desire to build a "straight-line" direct route for I-69. According to the Governor, "I've been for I-69, the direct route, all my public life."[1] Equally troubling is the Governor's dislike for the merit-based process of selecting the best alternative: "What would really make me feel good is if we had a Congress that would change those [NEPA] rules and regulations" that, in his view, have unnecessarily delayed the project.[2] With such a clearly stated new-terrain highway bias from the State's chief executive, INDOT's burden to prepare an objective and credible analysis of reasonable alternatives -- both highway and non-highway -- is even heavier than usual. In this case, INDOT's P&N Statement falls far short of meeting that burden. 2.2.2

Instead of addressing imagined needs and invented purposes, the P&N Statement should focus on the only true purpose of the project -- improving the connection between Indianapolis and Evansville -- and evaluate the alternatives that can achieve that purpose at the least economic and environmental cost.

SUMMARY OF COMMENTS

This analysis is based on a comprehensive review of INDOT's P&N Statement, a review of additional transportation and economic data, and our understanding of the rural environment in Southwestern Indiana. Our analysis includes the following major conclusions:

1. Three key reports relied upon by INDOT remain unavailable for public review and comment.

2. Much of the data relied upon by INDOT in the transportation and economic "needs" analysis is incomplete or inaccurate, thereby creating a false and misleading portrait of conditions in Southwestern Indiana.

   - "Accessibility" is dependent primarily on population and overall employment; since Southwestern Indiana has less population, its accessibility will continue to be lower regardless of the transportation system.

     ► *INDOT's own data confirm that areas on existing highways do not have significantly better accessibility to Indianapolis or other metropolitan areas.*

   - Incredibly, INDOT used only three years of traffic data as the basis for its conclusion that the Study Area has road safety problems.

     ► *Our more accurate analysis of 11 years of data shows that the area is as safe as, if not safer than, other regions.*

   - INDOT falsely portrays Southwestern Indiana as an economic backwater that lags behind other regions of the State. Considering the area's largely rural character, conditions are as good as or better than other areas of the State.

     ► *Rural Southwestern Indiana does not have population problems;*
     ► *Employment conditions are as good as or better than conditions elsewhere;*
     ► *Low per capita personal income is not representative of the Study Area, and some counties are doing better than the State average;*
     ► *Southwestern Indiana has relatively few people in poverty; and*
     ► *Counties and cities along Interstates have their own economic challenges.*

3. Notably, even INDOT concedes that it is impossible to say whether a new highway leads to economic development.

   - In the case of I-69, a new highway would draw nearly 40% of travelers away from U.S. 41, additional travelers away from other roads, and seriously damage the economies of Terre Haute, Vincennes, and other communities in the area;

   - Rural counties throughout Indiana have similar income levels regardless of whether they are near interstates.

4. INDOT selectively omitted economic and transportation data from four of the most prosperous counties in the Study Area -- Marion, Morgan, Hendricks, and Johnson -- thereby skewing results in ways that favor INDOT's preferred alternative.

5. INDOT continues to ignore the large public opposition to an all-new highway and the support for the U.S. 41/I-70 alternative.

6. The 26-county Study Area is far too large, and includes counties not in the path of any of INDOT's proposed alternatives.

   - By maximizing the size of the Study Area, INDOT is more likely to identify problems -- however fictional they may be -- for which INDOT is likely to prescribe an all-new highway as the solution.

7. Since transportation and economic conditions are much better in rural Southwestern Indiana than portrayed by INDOT, the broad purposes INDOT has declared for the highway -- including "strengthening the transportation network" and "improving opportunities for economic development" -- are unsupportable and should be removed from the P&N Statement. Instead, we recommend that INDOT:

   - Focus on the only legitimate and true purpose for the highway project -- improving the connection between Evansville and Indianapolis in a way that is fiscally responsible and minimizes harm to the environment and communities;

   - Accurately characterize existing transportation conditions in Southwestern Indiana; and

   - Taking those conditions into account, choose the alternative that best meets the purpose of the project.

8. INDOT otherwise should use limited State and federal funds for targeted improvements on existing roads with "hot spot" safety risks, and for other improvements on State roads that will maximize accessibility within the region and throughout the State.

ANALYSIS

I. POLICY FRAMEWORK FOR THE I-69 PROJECT

The Policy Framework section of the P&N Statement reviews "important federal and state policy decisions" that presumably affect the decisionmaking process for the I-69 project. Unfortunately, since the P&N Statement does not explain how each of these policy considerations affects the project, readers are left to guess for themselves what these policies mean. To address this deficiency, we explain how each of these considerations should affect the

I-69 project, and we also request that INDOT provide additional information to permit an informed review of the Policy Framework section.

A. Federal Legislation and Policies

National Highway System

The P&N Statement briefly discusses the National Highway System (NHS), but does not explain its relevance to the purpose and need for the I-69 project. The NHS roads in Indiana are shown in Figure 1 of the P&N Statement. Any new I-69 highway -- including an upgraded U.S. 41 and I-70 -- will be included in the NHS. Therefore, INDOT needs to explain the process for adding a new road to the NHS. 2.2.1

Federal regulations set forth the criteria for state additions to the NHS.[3] The P&N Statement should have discussed the role of these criteria in selecting a highway alternative. For example, one of the criteria requires that INDOT assess whether modifications to existing NHS routes may be preferable to new highway construction (criterion 7). This criterion strongly supports the choice of upgrading U.S. 41, which is part of the NHS, to interstate standards. INDOT also is required to evaluate the effects of adding a new NHS route on existing NHS routes that are in close proximity (criterion 6). Since U.S. 41 is part of the NHS, INDOT will need to study the impacts of any new-highway alternatives on U.S. 41. 2.2.1

> ***National Highway System requirements support upgrading existing roads to best meet the purpose of connecting Indianapolis and Evansville.***

Corridor 18

One of INDOT's three current purposes for the Interstate 69 project is to complete Indiana's portion of Corridor 18. A major problem with including this purpose is that it eliminates the "no-build" alternative from consideration, despite a legal requirement to do so. See 40 CFR §§ 1502.14(d), 1508.25(b)(1). INDOT has promised to consider the no-build alternative, which would allow INDOT to seriously consider other transportation options, such as high-speed rail.[4] Completing Indiana's portion of Corridor 18 -- which Congress has designated as an interstate highway -- requires construction of a new or upgraded highway through Southwestern Indiana. Since inclusion of that goal will force INDOT to violate NEPA (by eliminating the no-build alternative), INDOT should eliminate the Corridor 18 goal from the project. Otherwise, INDOT's statement that it will seriously consider a no-build alternative simply is not credible.[5] 2.2.1

A separate reason to remove the Corridor 18 purpose from the P&N Statement is that a new Canada-to-Mexico highway is not necessary. Traffic already flows freely between Canada and Mexico on existing highways. There is no compelling transportation need to build a major new interstate route that would drain Indiana's budget and simply transfer economic benefits from one area to another. INDOT concedes that federal law "does not require states to complete 2.2.1

I-69; if an individual state does not want to complete its portion of I-69, it will not be compelled to do so."[6] Given the voluntary nature of Corridor 18, and that it is decades away from construction, the goal of completing Indiana's portion of Corridor 18 through new highway development is unnecessary and should be eliminated. INDOT instead should focus on the true purpose of the I-69 highway project -- improving the connection between Indianapolis and Evansville in a fiscally, environmentally, and socially responsible manner. 2.2.1

The Corridor 18 objective is not a valid purpose for the P&N Statement.

B. Indiana Statewide Transportation Policies

A fundamental problem with the section on Indiana Statewide Transportation Policies is that the P&N Statement does not explain the relevance of the policies to the I-69 route selection process. The P&N Statement needs to explain how the overall transportation policies, economic growth policies, and highway system policies will impact the I-69 project. Without any explanation of either context or relevance, it is impossible to analyze this section of the P&N Statement in detail.[7] 2.2.2

Key policies in the 1995 Long-Range Plan summarized in the P&N Statement strongly support the choice of upgrading U.S. 41 and connecting to existing I-70 rather than building an expensive and harmful all-new highway, and using the savings for targeted road improvements throughout the State. These policies, and the reasons why they support improving existing infrastructure, include:

Transportation System Effectiveness is best served by maintaining and upgrading the network of existing National Highway System roads in Indiana, and targeting safety "hot spots" for improvements. Building a single expensive all-new highway that drains the State budget is the least likely option to achieve a robust, well-integrated system.

Economic Development is most effectively and efficiently achieved through upgrading existing roads to 21st century highway standards, eliminating safety hazards on roads throughout the State, and otherwise developing an integrated network of highway and non-highway alternatives. Spending substantially more than a billion dollars on a single all-new interstate, in contrast, squanders State and federal money, and, as explained later in this document, will not improve overall economic conditions in Southwestern Indiana. 2.3.2

Natural Environment and Energy. The 1995 Long-Range Plan commits INDOT to establishing a transportation system that protects the environment. Building any all-new highway that destroys thousands of acres of prime farmland and forests, harms communities, and exacerbates urban sprawl obviously is incompatible with this policy. In contrast, upgrading U.S. 41 to interstate status and connecting to I-70 around Terre Haute minimizes environmental impacts.

A clear reflection of the bias in the P&N Statement is that it shows INDOT's 1996 ill-fated new-terrain highway as one of Indiana's "Commerce Corridors."[8] The 1996 new-terrain highway is not a Commerce Corridor because it was never built. Including the fictional new-terrain highway in Figure 3 of the P&N Statement is prejudicial, and reflects the institutional bias in favor of a new-terrain road. INDOT should remove the road from the map. 2.2.2

Finally, we note that of the nine "economic centers" in the Study Area of Southwestern Indiana (see Figure 2 in the P&N Statement), five are connected by existing U.S. 41, I-70, and I-64. If congestion along SR 37 between Bloomington and I-465 were alleviated, seven of the nine counties would be well-connected, and would fulfill the goals of INDOT's policies. This combination of improvements also would satisfy the policies requiring INDOT to select investments that "offer the best value" and that protect the environment.[9]

Indiana's transportation policies support the U.S. 41/I-70 alternative, and otherwise using State money for targeted road improvements to maximize safety and accessibility within regions and across the State.

II. NEEDS ASSESSMENT

The needs assessment in the P&N Statement erroneously portrays Southwestern Indiana as an isolated and impoverished region of the State with serious road safety problems. By creating these fictions, INDOT more easily can argue that an all-new highway through the middle of the region is needed to alleviate these dire needs. As we explain in this document, both data and common sense show that conditions in Southwest Indiana -- especially in rural areas -- are no worse than in other areas of the State, and in some cases are better. Equally important, more than four decades of interstate highway-building in the State demonstrates that new highways do little to stimulate new economic development, especially in rural areas. For these reasons, INDOT should return to the original purpose for the I-69 project -- improving the connection between Indianapolis and Evansville -- and focus its resources on examining reasonable, environmentally and economically responsible alternatives that fulfill that purpose.

Three key flaws in the Needs Assessment are: 1) critical documentation is missing; 2) the Study Area for the I-69 project is far too large; and 3) INDOT arbitrarily excluded the four counties in the Indianapolis metropolitan area from a major portion of the needs analysis. We explain each of these flaws below, and then discuss errors specific to each section of the Needs Assessment.

- Missing Documentation

As of September 18, 2001, three of the key transportation and economic reports are still unavailable for public review, even though INDOT released the P&N Statement four months ago. Key conclusions in the P&N Statement are based on these unavailable reports: 11.3

1. Travel Model Documentation (Task Report 3.3.3.2) *(referenced on page 16 of the P&N Statement);*

2. Regional Transportation Needs Analysis (Task Report 3.3.4) *(referenced on page 22 of the P&N Statement);* 11.3

3. Regional Economic Needs Analysis (Task Report 3.4) *(referenced on page 45 of the P&N Statement).*

The fact that the P&N Statement relies extensively on not-yet available reports seriously undermines the reliability of the underlying data, the meaningfulness of public comments, and the overall credibility of the EIS process. To rectify this problem, INDOT should release all documentation for the P&N Statement and allow time for public comment before proceeding with the next phase of the process. 3.1

- Study Area Is Too Large

A basic flaw in the P&N Statement is that the Study Area for the highway is far too large. The needs assessment in the P&N Statement attempts to characterize transportation and economic conditions in a 26-county area of Southwestern Indiana. The Study Area includes five counties through which a new road almost certainly will not pass: Posey, Spencer, Perry, Crawford and Orange. By maximizing the size of the Study Area, INDOT is more likely to identify problems -- however fictional they may be -- for which INDOT is likely to prescribe an all-new highway as the solution.

- Selective Omission of Indianapolis Metropolitan Area Data

Having created a large study area, INDOT without any explanation omitted data from the Indianapolis Metropolitan Statistical Area (MSA) counties (Marion, Hendricks, Johnson, and Morgan) in key transportation and economic categories, even though these counties are in the Study Area. For example:

- INDOT omitted the Indianapolis MSA county data from the congestion estimate in Table 7 of the P&N Statement, thereby allowing any increase in congestion to appear more reasonable and tolerable. To avoid misrepresenting congestion conditions, INDOT should have included Indianapolis MSA data in this section. 2.3.1

- INDOT omitted the Indianapolis MSA counties from most of the economic needs discussion. INDOT excluded data from these counties on population trends, employment trends, and personal income, which unfairly skews downward the data in these categories for the Study Area. 2.3.2

INDOT does not explain why it omitted these counties. INDOT could not have excluded them on the basis of size, since Monroe, Vigo, and Vanderburgh Counties all are either larger than or

comparable in size to Morgan, Hendricks, and Johnson counties, which are in the Indianapolis MSA and the Study Area. Since there is no valid reason to exclude the Indianapolis MSA county data from the P&N Statement, and INDOT has not offered any reason, excluding the data is arbitrary and capricious. 2.3.2

A. TRANSPORTATION NEEDS IN SOUTHWESTERN INDIANA

Evansville-to-Indianapolis Connection

Accessibility is an important transportation goal and there are two types of accessibility measures in common use in transportation planning.[10] The first type of accessibility measure can be characterized as: "How many jobs (doctors, restaurants, et cetera) are within a 15-minute (or other period) travel time?" A problem with this type of measure is the "cliff effect", i.e. a major employment center is counted if just inside the ring, but excluded if it is just outside, even if the difference to the public is very small. The second type of accessibility measure avoids this problem by including accessibility to all points, but weighting the closer ones higher.

The "Evansville-to-Indianapolis Connection" discussion in the P&N Statement uses neither of these types of commonly-used accessibility measures. Instead, it creates its own method, which is actually just a proposed solution masquerading as a need. It compares straight line travel distance with roadway distance. This is not a need; rather, it is a solution disguised as a need. The only way to make the roadway distance approach the straight line distance is to build a new and straighter road. 2.3.1

Even when the travel time concept is introduced (page 20 of the P&N Statement), it is just a recycling of the same idea. The perceived "ideal" is to drive in a straight line at highway speeds. There is only one way to achieve this ideal, by building a new straight line highway in disregard of technical, economic, and environmental considerations. Again, this is a proposed solution rather than a need. As such, the straight-line analysis violates NEPA.

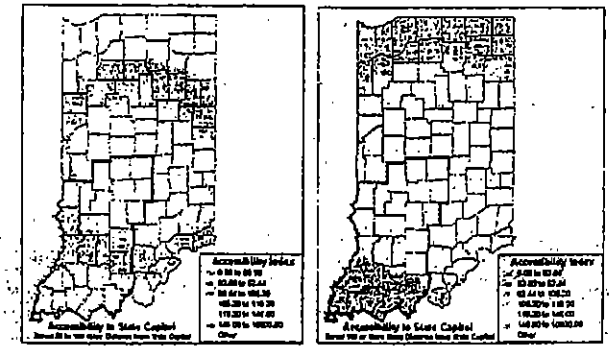
INDOT's "straight-line" analysis is a solution disguised as a need.

Personal Accessibility

The "personal accessibility" measures discussed in the P&N Statement are of the second type of accessibility measure as described above, and are, in principle, valid measures. However, the conclusion -- ". . . there is a need for increased accessibility within Southwest Indiana" -- is overstated and therefore misleading. The calculated accessibility is lower in Southwest Indiana than for the State as a whole primarily because population -- and therefore employment -- are lower in the region. Lower population and employment translate into fewer urban areas, major airports, and universities. The calculated accessibility for Southwest Indiana will continue to be lower regardless of the transportation system. It is not a reasonable objective for this standard to be the same for less densely populated regions as it is for more densely populated regions. These calculations will be much more useful in comparing different alternatives for the same region, as opposed to comparing different regions. 2.3.1

INDOT's own data confirm that an all-new highway will not significantly improve accessibility to Indianapolis from the more distant points in Southwestern Indiana. According to Figure 11 in the P&N Statement (reproduced below),[11] accessibility to Indianapolis from counties along existing I-69, I-65, and other interstates is not significantly better than in counties in Southwest Indiana not served by an interstate.

Figure 11 – Indiana Accessibility to Indianapolis



INDOT's data demonstrates that less populous areas farther away from Indianapolis are likely to have lower accessibility ratings regardless of the existence of interstate highways. Therefore, there is no rational reason to conclude that a new highway will improve accessibility across regions.

Other errors and misleading information in INDOT accessibility data include:

- Clark and Floyd Counties, immediately adjacent to Jefferson County and Louisville, Kentucky, appear to have poor access to the Louisville airport (see Figure 9), which plainly is not true.
- Evansville has an airport served by several major airlines, but, according to Figure 9, the Evansville metropolitan area has poor access to it. 2.3.1
- Figure 8 presumes to show accessibility to urban areas, yet northern Indiana, with interstate access to Chicago, Toledo, Fort Wayne, and Lansing, is shown to have only poor to average access to urban areas.

An all-new interstate highway will not significantly improve accessibility in Southwestern Indiana relative to other regions; therefore, INDOT should delete this consideration as a purpose for I-69.

Travel Efficiency (Congestion)

We agree with the INDOT's conclusion that "roads generally are *less* congested in the Study Area than in the rest of the State," and that rural and urban interstates are more congested elsewhere than in the Study Area.[12] Even by 2025 the areas of major congestion are concentrated in the Indianapolis metropolitan area, which already has many miles of interstates.[13] The P&N Statement actually demonstrates that interstates typically do not relieve traffic congestion in the long run – Marion County has more miles of interstate than any other county in the State, yet INDOT predicts that it will be highly congested by 2025. 2.3.1

INDOT is correct that congestion relief is not a valid purpose for constructing an all-new highway through rural Southwestern Indiana.

Safety

Based on very little data, INDOT grimly concludes that "the Study Area has significant rural highway safety problems as compared with the rest of rural Indiana."[14] INDOT's conclusion is erroneous because it reflects INDOT's selective use of incomplete data to force a preordained conclusion. As we explain below, the data actually demonstrates that the Study Area is as safe as or safer than other regions in the State; therefore, INDOT's pessimistic conclusion is incorrect.

INDOT's review of accident statistics uses only a three-year time period (1996 to 1998). Using only three years of data renders the analysis statistically invalid. High or low numbers in such a short period of time can drive averages higher or lower, thereby resulting in an incomplete and inaccurate analysis. We used a more reasonable eleven year period (1986 to 1996) to evaluate safety data, which produces a more accurate evaluation of conditions. For example, in Knox County, the average number of fatalities in one three-year period within the 1986 to 1996 data set was 4, and in another three-year period it was 11. However, over the entire eleven year period the average was 7.5. 2.3.1

The difference between INDOT's limited data and more representative data is striking. For example, as illustrated in Figures A and B below:

- INDOT claims that "in terms of the percentage of serious accidents which involve fatalities, Orange County has the highest percentage in Indiana."[15] In fact, over the much more representative 11-year period from 1986 to 1996, *Orange County averaged only 3 deaths per year, one of the lowest fatality rates in the entire State.*
- INDOT's statement that "there is a 'band' of counties with poor safety records in the middle of the Study Area" is wrong.[16] Long-term data show that this assertion is incorrect – these counties, including Knox, Daviess, and Martin counties, have similar average data as other State regions.

Figures A and B below illustrate road safety conditions throughout Indiana between the more representative period of 1986 to 1996.

Figure A
Average Number of Fatalities Per Year
1986-1996[17]

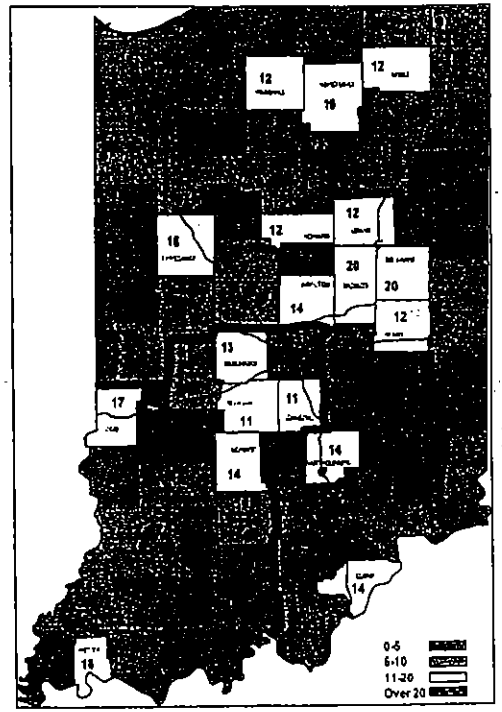
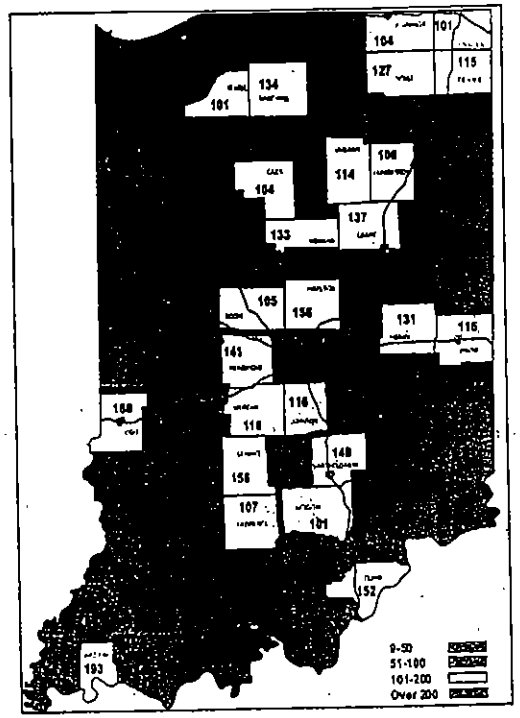


Figure B
Total Highway Deaths
1986-1996[18]



As these figures show:

- Accident rates were no greater in the Study Area than elsewhere in the State;
- Rural counties in Southwestern Indiana had fewer fatalities than other comparable areas in the State;
- The most highway deaths occurred in more populous urban areas.

INDOT's conclusion that there is a significant safety problem in the Study Area therefore is invalid.

Our analysis illustrates a simple fact of transportation: There is a direct correlation between population size and the number of fatalities and injuries. More people mean more vehicle miles traveled, which leads to more accidents. Interstates, which induce more travel, can result in more highway deaths -- 20 of the worst 25 counties statewide for average number of fatalities are on or near interstates.

Apart from the inaccuracy of INDOT's data, the P&N Statement reveals what INDOT wants the data to show to support its fictional view of conditions, thereby even more completely invalidating INDOT's analysis:

- INDOT concedes that "it is important to note that this needs analysis does not specifically address the issue of *why* the crash rates in certain counties and on certain routes are significantly above statewide averages."[19] Yet in the same paragraph, INDOT claims that each of the potential highway alternatives could result in safety improvements. *If INDOT does not know why accidents happen, how can INDOT assert that a highway will reduce them?* Thus, even if there were a unique safety issue in Southwestern Indiana, which there is not, INDOT could not justify building a new highway to alleviate the claimed problem. 2.3.1

- INDOT declares that evidence of significant highway safety problems in the area shows that "the Study Area has almost 30% of rural counties in the state with high fatal accident rates.[20] *What INDOT fails to note is that the Study Area has nearly 30% of the rural counties in the State; therefore, it is not surprising that it has almost 30% of the counties with high fatality rates.* The same conclusion applies to high injury accident rates.[21] The bottom line is that the Study Area is no worse than other rural areas in Indiana. 2.3.1

INDOT's claim that Southwestern Indiana has significant safety problems is factually baseless, misleading and therefore arbitrary, and reflects a P&N Statement that is written to support the pre-ordained new terrain highway alternative. Indiana residents would be better served if INDOT focused more resources on reducing accident rates in the counties where they are highest, such as Marion, Allen, Delaware, Madison, and the entire tier of northern counties. Repairing and upgrading roads throughout the entire Study Area would save more lives and prevent more injuries than the construction of any one interstate.

Counties in Southwestern Indiana, especially rural counties, are as safe as or safer than other areas in the State.

B. ECONOMIC DEVELOPMENT NEEDS IN SOUTHWESTERN INDIANA

The P&N Statement's analysis of conditions in Southwestern Indiana falsely depicts the area as economically disadvantaged in comparison to other regions in the State. The obvious inference is that a new highway would improve conditions. As we explain below, INDOT's analysis is misleading and incomplete because:

1. A more complete and representative evaluation of economic conditions would reveal that the rural counties are doing well for rural counties, and the urban counties (for example, Marion and Vanderburgh) suffer from their own social and economic challenges to a much greater extent than the rural counties.

2. As INDOT concedes, it is impossible to conclude that highways foster economic development. In Southwestern Indiana in particular, an all-new highway is likely to do more harm than good.

For these reasons, the economic needs analysis in the P&N Statement is arbitrary and capricious, and should be deleted from the final statement.

Economic "Stress"

INDOT's needs assessment relies heavily on a U.S. Department of Agriculture (USDA) report entitled Rural Development – Indiana Strategic Plan FY 2001. Remarkably, the report's authors acknowledge that it does not accurately detail conditions in the area: *"Because we recognize that this data is limited in terms of what it can tell us about the vitality of an area, we have begun gathering more detailed information on Indiana rural communities through 'Community Assessment Visits.'"*[22] Given this statement, INDOT's heavy reliance on the report is misplaced and arbitrary. INDOT should not use the USDA report as the basis for any conclusions in the P&N Statement. 2.3.2

More fundamentally, INDOT's use of the USDA report reflects an institutional prejudice against rural counties, based on the subjective assumption that an urban county is the preferred economic and social environment. A number of the USDA report's indicators reflect differing circumstances for rural versus urban environments, and do not indicate problems. *These indicators have no bearing on economic conditions.* For example, the report considers water wells and septic tank systems to be indicators of a stressed environment, even though their existence has nothing to do with individual economic circumstances, and they are simply part of the rural lifestyle. In fact, in more relevant indicators, such as higher education,[23] dropout rates,[24] and child care availability,[25] Southwestern Indiana is doing as well as or better than the rest of Indiana. 2.3.2

INDOT's use of the USDA report is misleading for other reasons as well. For example, according to the report, Owen County is one of the most "stressed" counties in Indiana, yet, according to INDOT's data, Marion County -- which is also in the Study Area -- has a higher poverty rate (see Table 12 in the P&N Statement). Omitting this important information portrays rural communities in an unfair light. INDOT should have compared rural counties within the Study Area to rural counties in the rest of the State. If INDOT had performed this simple analysis, it would have found that Southwestern Indiana rural counties are no more "stressed" than rural counties elsewhere in the State, including those along interstate highways.

Economic conditions in Southwestern Indiana are much better than portrayed in the USDA report.

Population Trends

According to INDOT, Southwestern Indiana's population growth -- outside of the Indianapolis MSA -- "has lagged behind even the rest of Indiana."[26] The difference between the growth rates is miniscule -- 0.62% for the State versus 0.52% for the Study Area outside of the Indianapolis MSA. And, as explained earlier in this document, if INDOT had included the Indianapolis MSA data in its analysis, the growth rate likely would have been larger than for the State as a whole. Nevertheless, INDOT argues that "[a] low rate of population growth is an indicator of the lack of economic opportunity, suggesting that many individuals are relocating to other areas where economic opportunity is greater."[27] This conclusion is speculative and wrong for several reasons.

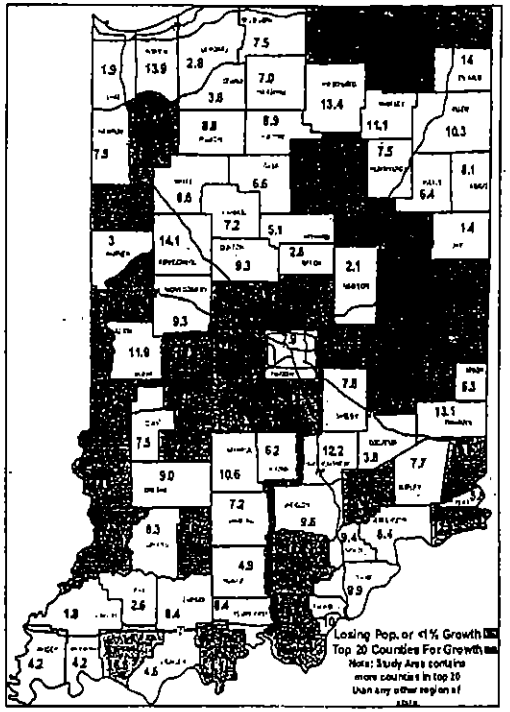
First, no conclusions can be drawn from the population data relating either to economic conditions or the desirability of a highway. Rural Southwestern Indiana's economy is based heavily on agriculture, and population densities are lower. Rural areas do not grow at the same rate as urban areas; indeed, rapid population growth can be harmful because it consumes valuable farmland. Many social, environmental, and fiscal problems occur in the fastest-growing areas of the State. And, other factors, such as industry expansion or contraction, affect population trends much more so than the presence or absence of interstate highways. 2.3.2

Second, very few people move to other counties within Indiana; in 1999 and 2000, for example, 95 percent of Hoosiers remained within their initial county of residence; only 3 percent moved to another county within the State.[28] Therefore, it is wrong for INDOT to state that "many individuals" are moving to other areas where economic opportunities are greater.

Third, INDOT's population discussion is flawed because INDOT itself can't decide whether rapid growth is good. The USDA report, cited favorably by INDOT, considers rapid population growth to be an indicator of stress,[29] whereas, as noted above, INDOT considers rapid growth to be a prerequisite for economic opportunity. Thus, the USDA report contradicts INDOT's own assumptions. 2.3.2

Fourth, even if INDOT's premise were correct that rapid population growth is needed for economic development, the data supports the conclusion that the Study Area is doing well. Figure C below summarizes data from the 2000 census. 2.3.2

Figure C
Percent Change in Population
1990-2000[30]



According to the new data[31]:

- 7 of the top 20 growth counties are in the Study Area, which is more than in any other region of the State.
- Owen County, with a 26.1 percent increase, is the fourth-fastest-growing county in the State.
- Only 4 of the 17 counties in the State that lost population or grew by less than one percent are in the Study Area (Knox, Perry, Martin, and Vigo), and 2 of those counties -- Perry and Vigo -- are on interstate highways.

Thus, the Study Area is growing at essentially the same rate as Indiana as a whole and faster than in some areas of the State.

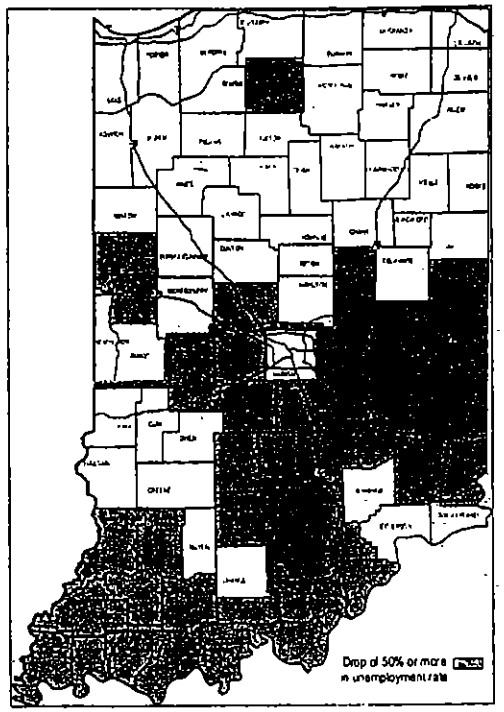
Rural Southwestern Indiana has no population issues that a new highway would address.

Employment Trends

INDOT conceded that employment growth in the Study Area (excluding the Indianapolis MSA), actually is better than Indiana as a whole (1.17% annual growth versus 1.12%).[32] This data flatly contradicts INDOT's claim that the Study Area has "lower rates of job growth."[33] Had INDOT included the four Indianapolis MSA counties in its calculations, the employment growth rate would have been even better than for the State as a whole. 2.3.2

Equally impressive is that unemployment dropped more in the Study Area than in any other region in the State. Of the 43 counties that experienced at least a 50% drop in the unemployment rate, 18 were in the Study Area. See Figure D below. 2.3.2

Figure D
Change in Unemployment Rate
1990-2000



Other economic data also refutes conclusively INDOT's erroneous claim that the Study Area lacks economic opportunity. For example:

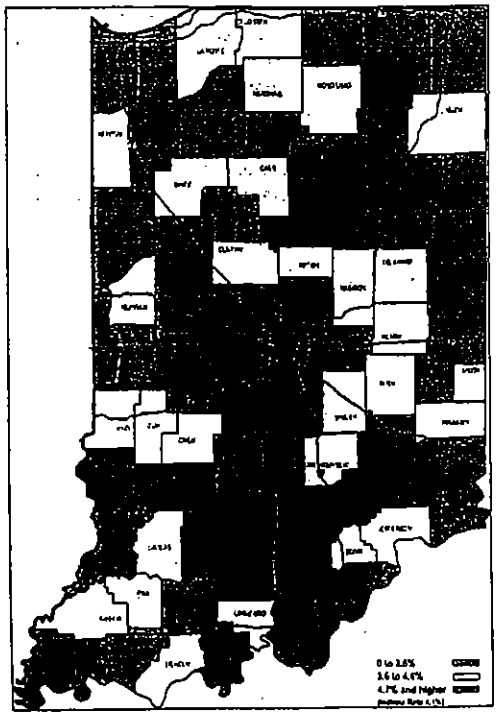
- Including Marion County, the average unemployment rate for all counties in the Study Area in July 2001 was 3.6%, while the rest of the State was nearly one percentage point higher, at 4.4%.[34]
- Excluding Marion County, the Study Area still had a much lower unemployment rate in July 2001 (3.7%) than the rest of the State.[35]
- Employment in the Study Area (excluding the Indianapolis MSA) grew at a higher rate than elsewhere in the State (see Figure 15 in the P&N Statement).

- Unemployment in the State has decreased in the Study Area in the last decade at a faster rate (2.7 percent) than in the State as a whole (2.4 percent).[36]

In short, the Study Area, whether measured with or without Marion County, has as good as or better employment conditions than the rest of the State.

More generally, whether in the Study Area or elsewhere in the State, some counties have relatively low unemployment rates, while others are higher, *regardless of whether they are on or near an interstate highway.* Figure E, which illustrates the county-by-county variations in the July 2001 employment rate, demonstrates that the presence of an interstate highway does not significantly affect employment conditions. Location, in this case, means very little. 2.3.2

Figure E
July 2001 Unemployment Rates[37]



The P&N Statement also claims that the Study Area is suffering from low employment rates in the fastest-growing industries.[38] Regrettably, INDOT has not yet released the key report *Regional Economic Needs Analysis* that is the basis for its claim. Nevertheless, if INDOT's data are accurate, the rate of employment in the 20 fastest-growing industries is virtually the same in both the Study Area (excluding the Indianapolis MSA) and for Indiana as a whole: 34.2% in the Study Area compared with 34.9% outside the Study Area.[39] Again, INDOT's attempt to portray Southwestern Indiana as uniquely depressed compared to the rest of the State is inaccurate and misleading.

Another flaw in INDOT's explanation is that there is no correlation made between interstates and growth in the "fastest-growing" industries. Most of the listed industries -- for example, motion pictures, securities and commodities brokers, museums, botanical gardens -- do not require interstates for growth and success. *And, none of the industries listed in the Council for Urban Economic Development report (see below) that value transportation are included in the "top 20" rapidly growing industries listed in the P&N Statement.* 2.3.2

The P&N Statement seriously mischaracterizes employment conditions in Southwestern Indiana, which are as good as or better than those in the rest of Indiana.

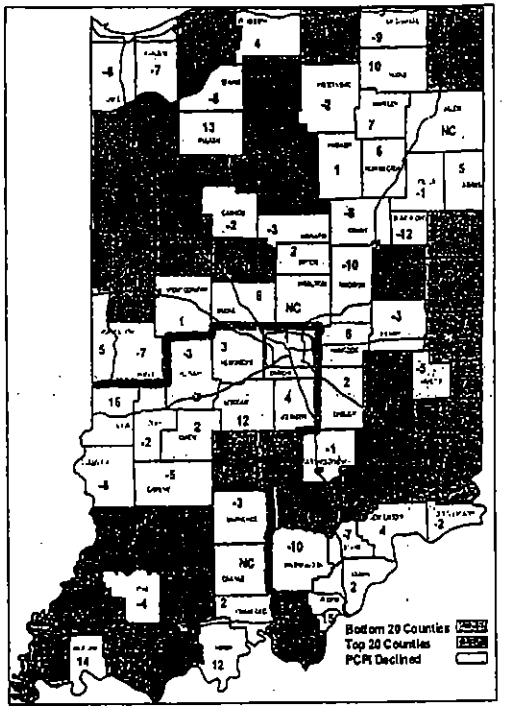
Personal Income

The P&N Statement asserts that "the Study Area (outside of the Indianapolis MSA) lagged behind both the United States and Indiana (outside of the Indianapolis MSA) in per capita personal income."[40] INDOT's inexplicable exclusion of four counties within the Study Area -- Marion, Morgan, Hendricks, and Johnson --unfairly and unlawfully skews the per capita personal income (PCPI) downward. Including the Indianapolis MSA would have raised the PCPI for the Study Area, and also would have accurately portrayed the entire area. 2.3.2

Equally important, PCPI data demonstrates that the Study Area is doing better in some categories than other regions of the State, and is keeping pace in other categories:

- From 1969 to 1998, 9 of the 20 counties in the State with the best improvement in PCPI were in the Study Area (excluding the Indianapolis MSA).[41] See Figure E below.
- In 1998, 8 of the top 20 counties in PCPI were in the Study Area, which is more than any other region of the State.[42] 2.3.2
- The Study Area has approximately the same percentage of counties in the State in the lowest 20 for PCPI (31 percent) as the percentage of counties in the State that comprise the Study Area (30 percent), thereby indicating that Southwestern Indiana is not uniquely disadvantaged.

Figure F
Change in Per Capita Personal Income Rank
1969 - 1998[43]



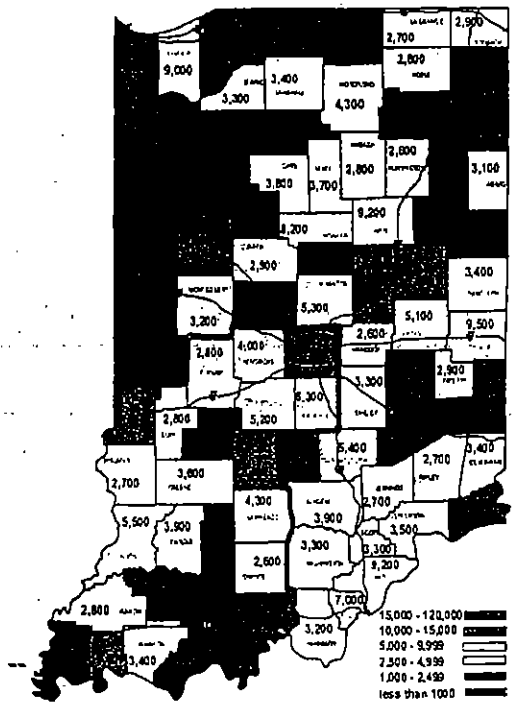
Low per capita personal income is not representative of the Study Area as a whole, and some counties are doing much better than the State average.

Poverty

The P&N Statement's cursory discussion of poverty levels in the Study Area relies entirely on the USDA study, which, as explained above, is inaccurate and therefore misleading. More fundamentally, by including a section on poverty levels in the P&N Statement, INDOT implies that a new interstate highway would reduce those levels. The evidence in Indiana is to 2.3.2

the contrary. As illustrated in Figure G, Southwestern Indiana has relatively few people in poverty, and poverty levels in the more populous urban areas are much higher than in rural areas. 2.3.2

Figure G
Poverty Levels
1997[44]



According to the data:

- 4 of the 10 counties identified with high poverty rates in Table 12 of the P&N Statement (page 48) are located on an interstate.
- Counties along existing I-69 have more people at the poverty level than in other areas.
- Marion County, which has more miles of interstate than any other county in Indiana, also has more people at the poverty level than the rest of the Study Area combined.[45] 2.3.2

The use of rates to characterize poverty levels is misleading in the P&N Statement, since the Study Area has relatively low numbers of people in poverty. Rural counties typically have a lower population than urban counties. Not surprisingly, urban counties have the highest number of people at the poverty level. 2.3.2

Southwestern Indiana has relatively few people in poverty, and a new highway would not reduce those levels further.

The Role Of Transportation Systems In Supporting Economic Development

INDOT's discussion of the role of transportation systems in economic development is simplistic, skewed, and incomplete. Correctly, however, INDOT does concede that it is impossible to determine whether highways contribute to economic development:

> *"The relationship between transportation improvements and economic development is highly complex. It is not possible to predict with certainty whether a particular project will cause economic development to occur, much less to predict where, how, and when it will occur."*[46]

This statement alone demonstrates that Indiana's choice of "improving opportunities for economic development" as a primary goal for the I-69 project is arbitrary and capricious, since INDOT cannot state with any certainty that highways do lead to economic opportunity. Indeed, in the case of a new I-69, the U.S. Government has determined that an all-new highway would actually *shift* nearly 40% of travelers away from U.S. 41 and to the new highway, and thereby seriously damage businesses along U.S. 41.[47] Other communities also would be hurt. Thus, the economic benefits, if any, of an all-new highway would be far offset by economic losses on U.S. 41 and elsewhere, the damage to divided communities, and enormous construction costs.[48] 2.3.2

INDOT correctly agrees that it is impossible to predict whether highways lead to economic development; in fact, in the case of I-69, any economic benefits would be more than offset by economic losses.

The Council for Urban Economic Development Report

INDOT hired the Council for Urban Economic Development (CUED) to study transportation conditions and economic development in Indiana. CUED's report is incomplete because it did not report on the number of businesses that have been lost in cities along interstates and other large highways. *Nevertheless, the CUED report does find, consistent with our analysis of highway impacts in rural counties, that "the presence of a highway by no means guarantees economic development."*[49] We concur, especially in rural areas with lower population.

A major omission in the CUED report is its failure to evaluate transfer and induced demand effects when new highways draw traffic away from existing corridors. We understand that, although CUED is supposed to study the economic costs of new highway construction, CUED has not yet received authorization from INDOT to begin the study. A balanced review of both the benefits and the costs of new highway construction is legally required under NEPA. *Therefore, INDOT should authorize the CUED to evaluate the economic costs of a new highway as quickly as possible.* 2.3.2

Another example of incompleteness in the CUED report is the discussion of the Crane Division Naval Surface Warfare Center (Crane). CUED attempts to link the continued viability of Crane to the existence of a major highway. *The CUED report does not mention that INDOT already is planning to upgrade and improve U.S. 231, which runs north-south past Crane.* Upgrading U.S. 231 will improve Crane's access to I-70 to the north and I-64 to the south. Improving other roads in the area would improve Crane's access in all directions. 2.3.2

As the CUED report concedes, Crane is doing very well and is planning to expand. It has survived and prospered while other bases across the country have closed. *For example, from 1991 to 1995, 35 of the 40 bases closed by the Pentagon were on or very near to an interstate highway.* Clearly, the presence of an interstate is no indicator that a military base will remain open; likewise, the lack of a nearby interstate does not hinder a military base's operation.

The CUED report does not support the development of an all-new highway.

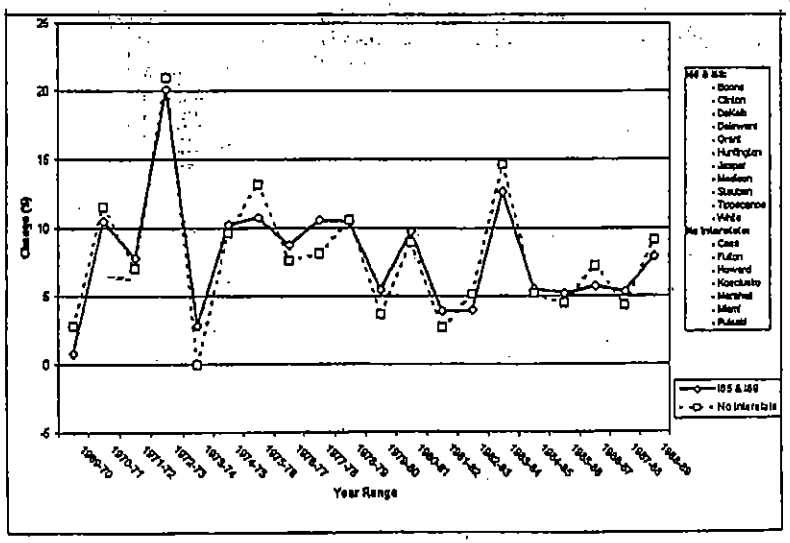
Highways Have Not Improved Life in Rural Indiana Communities

INDOT has failed to ask a basic question in its review of economic development and highways; namely, how do economic conditions in Indiana compare in communities on or near interstates compared with those not near interstates? Based on our analysis, highways do not contribute significantly to economic development in rural counties with low population. Common sense supports this conclusion, since in many rural counties the only signs of economic development along highways are gasoline stations and fast-food restaurants. When these minimal benefits are compared to the costs – for example, construction costs, divided farms, destroyed farmland, road closures, induced demand and sprawl – highways can be net economic losers. 2.3.2

Specific examples of the lack of benefit of highways to rural communities in Indiana include the following:

- The per capita personal income of largely rural counties along existing Interstates I-65 and I-69 is no better than in communities not near an interstate. The incomes in both areas have tracked nearly the same. See Figure H below.
- More than half of the counties Statewide that the USDA classifies as "stressed" are on or near an interstate highway. 2.3.2
- 11 of the 17 counties Statewide that did not increase in population are on or near an interstate highway.
- Marion County, which has more miles of Interstates than any other county in the State, also has more people at the poverty level than the rest of the Study Area combined.

Figure H[50]
Average Per Capita Personal Income
Interstates and No Interstates



A new highway will do far more harm than good in rural Southwestern Indiana.

III. PUBLIC AND AGENCY INPUT.

This Section of the P&N Statement is incomplete for several reasons. First, the P&N Statement fails to mention the enormous opposition to the project. The project has engendered more widespread opposition than any other highway project in the State's history. More than 100,000 citizens have asked INDOT and the Governor to stop the project. Public opponents to an all-new highway have significantly outnumbered supporters at a majority of the public hearings. Many of the State's major newspapers have editorialized against an all-new road and in favor of the U.S. 41/I-70 alternative. And yet, the P&N Statement omits any reference to the size and strength of this opposition.

Second, the public comment periods on Purpose and Need were largely an exercise in public relations rather than an objective, receptive means to obtain information. The clearest evidence is that INDOT set forth the three objectives for Purpose and Need in its contract with Bernardin Lochmueller & Associates dated November 1999, well *before* the first public hearings to receive comments on purpose and need. These three objectives have remained unchanged throughout the public comment periods, despite the absence of facts to support the purposes or needs.

More people have commented on this project than on any other highway project in the State, yet the P&N Statement addresses only a few of the many issues raised during the public meetings and in written comments. For example, many people raised the issues of farmland impacts, environmental consequences, and community harm during public meetings on purpose and need, yet these issues are ignored in the P&N Statement. INDOT's failure to take public views into account reflects the agency's bias in favor of an all-new highway, and violates NEPA.

The Public Input section ignores important environmental and economic issues that are the basis for the tremendous public opposition to an all-new highway and the support for the U.S. 41/I-70 alternative.

IV. PROJECT GOALS AND PERFORMANCE MEASURES

The P&N Statement lists three primary goals for the highway project:

1. Strengthen the Transportation Network in Southwest Indiana;
2. Improve Opportunities for Economic Development in Southwest Indiana;
3. Support Completion of I-69 as a National and International Freight Corridor.[51]

These three primary goals are the same as those listed as requirements in the INDOT contract with Bernardin Lochmueller & Associates for the EIS dated November 19, 1999. These goals are outcome-determinative: INDOT identified three goals, and then crafted a P&N Statement replete with fictional conditions and needs that supports those goals. It is hard to imagine a clearer case of rigging a project to support a pre-selected outcome. 2.3

Similarly, the P&N Statement lists ten supporting goals under these three primary goals, and identifies three of them as the "core objectives" of the project, "based on consideration of the policy/legislative framework as well as the transportation and economic development needs assessment."[52] The three "core objectives" are:

1. Improve the transportation linkage between Evansville and Indianapolis;
2. Improve personal accessibility for Southwest Indiana residents;
3. Facilitate interstate and international movements of freight and people through the I-69 corridor, in a manner consistent with the national I-69 policies.

The first of these core objectives is the only true purpose of the I-69 highway project. For decades, some Evansville residents have complained that they feel isolated from Indianapolis. Evansville is farther away from Indianapolis than any other large city in the State, and Evansville residents sometimes complain that they feel more a part of Kentucky than of Indiana. The lobbying group for an all-new I-69 – Voices For I-69 -- is based in Evansville, and the project's biggest boosters are Evansville political and business leaders. Clearly, improving Evansville's linkage to Indianapolis is the true "underlying purpose and need to which [INDOT] is responding." 40 C.F.R. § 1502.13. This goal is best achieved by upgrading U.S. 41 and connecting to I-70 through the approved bypass around Terre Haute. 2.3.1

The second of the "core objectives" – improving personal accessibility – is not a real purpose and need of the project. This objective is biased strongly in favor of a new-terrain highway that would bisect Southwest Indiana. By definition, building a new highway likely will "improve personal accessibility for Southwest Indiana residents," if only marginally, since, by its very existence, a new highway adds to the network. 2.3.1

This bias against U.S. 41/I-70 is unjustified, because it stems from a description of the project's purpose that does not reflect reality. Citizens hardly, if ever, argue that I-69 is needed to improve overall accessibility for Southwest Indiana residents. A glance at a road map will show that there is no shortage of roads and highways in the region. Nor, as the P&N Statement concedes, is there any significant congestion problem that requires expansion of the road network to improve accessibility. In short, INDOT's identification of "accessibility" as an objective rigs the purpose and need in favor a pre-selected, favored choice, which violates NEPA. Simmons V. U.S. Army Corps of Engineers, 120 F.3d 664 (7th Cir. 1997). INDOT therefore should eliminate this objective from the P&N Statement. 2.3.1

Finally, the objective of facilitating freight and people through the Canada-to-Mexico I-69 corridor is wholly unsupported by the draft P&N Statement. The P&N Statement repeats the national goals for the project, but has failed to demonstrate any local need. Indeed, even at the national level, as INDOT concedes, construction of the highway is entirely voluntary.[53] The P&N Statement's failure to demonstrate a local need for the national I-69 project violates NEPA and should be removed from the final P&N Statement.

INDOT should focus on the only true purpose of the project: Improving the connection between Indianapolis and Evansville in a fiscally, environmentally, and socially responsible manner.

ENDNOTES

[1] See "Tamer tone, I-69 talk pave debate," Indianapolis Star, Section D, page 1 (Oct. 13, 2000).

[2] Id.

[3] 23 CFR Part 470, Appendix D.

[4] P&N Statement, page 59.

[5] P&N Statement, page 52.

[6] P&N Statement, page 6.

[7] According to the P&N Statement, INDOT is in the process of revising the INDOT Long-Range Plan. Since the Long-Range Plan presumably will affect the decisionmaking process for the I-69 project, the P&N Statement cannot be considered complete without the revised Plan. Therefore, we request that INDOT issue a revised P&N Statement as soon as possible after completion of the revised Long-Range Plan.

[8] See Figure 3 in the P&N Statement.

[9] See INDOT policies on "Intergovernmental Cooperation" and "Natural Environment and Energy," P&N Statement, page 13.

[10] These measures are discussed in: *Data Collection and Modeling Requirements for Assessing Transportation Impacts of Micro-Scale Design*, prepared for Parsons Brinckerhoff Quade & Douglas for F.H.W.A (June 2000), available at http://tmip.tamu.edu/ clearinghouse/docs/microscale/.

[11] P&N Statement, page 30.

[12] P&N Statement, page 34.

[13] P&N Statement, Figure 12, page 35. The P&N Statement projects a growth rate of 0.43 percent in vehicle miles traveled (VMT) in the Study Area, excluding the Indianapolis MSA, compared to 0.78 percent for the entire State.

[14] P&N Statement, page 38.

[15] P&N Statement, page 38.

[16] P&N Statement, page 38.

[17] The Indiana Factbook 1998-1999, page 123 (reporting 11 years of data from the Indiana State Police).

[18] Id.

[19] P&N Statement, page 37.

[20] P&N Statement, page 37.

[21] P&N Statement, page 38.

[22] USDA Report, page 17.

[23] http://www.stats.indiana.edu/web/county/highered00.html.

[24] http://www.stats.indiana.edu/web/county/drpoutrt99.html.

[25] http://www.stats.indiana.edu/web/county/daycare00.html.

[26] P&N Statement, page 41.

[27] P&N Statement, page 41.

[28] http://www.ibrc.indiana.edu (accessed September 18, 2001).

[29] For example, Martin County, which had zero percent population growth during 1990-2000, and Perry County, which lost population, both score high in the population category in the USDA report, since the USDA considers moderate population growth to be less stressful than rapid population growth.

[30] http://www.stats.indiana.edu.

[31] http://www.stats.indiana.edu/c2k/c2kframe.html.

[32] P&N Statement, pages 41-42.

[33] P&N Statement, at page 41.

[34] http://www.stats.indiana.edu.

[35] http://www.stats.indiana.edu.

[36] http://www.stats.indiana.edu.

[37] http://www.stats.induana.edu/idwd/idwd_moest.asp

[38] P&N Statement, page 45.

[39] P&N Statement, page 45.

[40] P&N Statement, page 46.

[41] http://www.stats.indiana.edu/bea/p.asp.

[42] http://www.stats.indiana.edu/bea/p.asp.

[43] http://www.stats.indiana.edu/bea/p.asp.

[44] http://www.stats.indiana.edu.

[45] http://www.stats.indiana.edu.

[46] P&N Statement, page 48.

[47] *Corridor 18 Feasibility Study* (Wilbur Smith Associates, Nov. 1995), pages 4-44 to 4-45.

[48] M.G. Boarnet, *Road Infrastructure, Economic Productivity, and the Need for Highway Finance Reform*, 3 Public Works Management and Policy (April 1999).

[49] CUED Report, page 53.

[50] http://www.states.indiana.edu.

[51] P&N Statement, page 53.

[52] P&N Statement, page 53.

[53] P&N Statement, page 6.

Attachment C

Consulting Archaeologists' Report

Patrick J. Munson and Cheryl Ann Munson
Consulting Archaeologists
6707 W. Rock East Road
Bloomington, IN 47403
(812) 824-7717

October 22, 2002

Mr. Thomas Tokarski, President
Citizens for Appropriate Rural Roads, Inc.
PO Box 54
Stanford, IN 47463

Re: Review of archaeological study for draft environmental impact statement on proposed I-69 extension, southwestern Indiana, prepared by Bernardin Lochmueller & Associates

Dear Mr. Tokarski:

Per your request, we are writing to provide our comments on the archaeological studies for the draft environmental impact statement (DEIS) on the proposed I-69 extension, southwestern Indiana, prepared by Bernardin Lochmueller & Associates. To begin, we wish to provide background information for our review.

1. We are professional archaeologists, who have worked at Indiana University for more than three decades. In our careers we have had four decades of experience producing archaeological studies for highway construction projects, environmental impact statements, and a host of other federal- or state-funded requirements for archaeological investigations. Our studies geographically include not only Indiana, but also Kentucky, Illinois, Ohio, and Wisconsin, and range topically from earliest prehistoric Native American to historic Euroamerican, African American, and Native American archaeological sites. The investigations we have directed include pre-planning studies, initial surveys, test excavations, and data recovery to mitigate impacts, as well as "rescue excavations" following accidental construction impacts.

2. With one exception, we will comment only on the DEIS study of archaeological impacts for the I-69 alternate routes in southwestern Indiana, not on impacts to standing historic structures and cemeteries. The exception is a historic complex of inter-related historic archaeological features and sites that comprise one of Monroe County's and Indiana's most significant historic industrial resources – the pre-Civil War Virginia Ironworks.

3. Regardless of any criticism we have of the archaeological impact study per se, we are not opposed to the construction of I-69 between Indianapolis and Evansville.

Purpose of Our Comments

Following the letter and spirit of the National Environmental Protection Act (NEPA) and Federal Highway Administration (FHWA) section 4(f) evaluation, we will employ our

professional expertise to evaluate whether (a) the data on archaeological resources, and (b) the various interpretations (about density and location of significant sites), as presented in the DEIS, are adequate for making informed choices, based on likely impacts to archaeological resources, among alternatives being considered for project construction. We will review the "Sec. 106 Compliance Plan," which was developed in consultation with the Indiana State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation, as presented in Appendix P, for compliance with the National Historic Preservation Act (NHPA). We will also consider Section 5.13 of the Tier 1 DEIS as it pertains to archaeological impacts, and Appendix M, which describes the "Archaeology Analysis."

We question whether this particular Tier 1 study provides sufficient data and analysis for informed consideration under federal law and regulations, because of the way the study was designed and carried out. We conclude that the data offered in the DEIS on the likely presence of archaeological resources are substantially incomplete and the interpretations/predictions developed from data manipulation to assess likely impacts on those resources are based on assumptions or notions that are scientifically unsupported and logically flawed.

1. Compliance plan questions

The key question is whether the "tiered" approach to assessment of environmental impacts can be consistent with NEPA if the initial tier of data collection and manipulation does not provide adequate information and analysis to assess impacts and make informed choices among the project alternatives.

A second question is whether Section 106 compliance under NHPA is sufficient for compliance with NEPA when a Tier 2 study will be used to identify impacted archaeological resources rather than the Tier 1 study. How can the consequences of construction in the alternatives be considered when alternatives are not studied at a level of detail sufficient to know or estimate impacts?

A third question concerns the logic of the methods used in this Tier 1 study – specifically the narrow width of the working alignments (sometimes called "footprint," [App. M, p. 14]) versus the much wider study corridors. For the archaeological impact study, the focus is on the narrow alignments. As such, the only impacts listed are those on previously recorded archaeological sites within the working alignments; see Table 1 (App. M, p. 23). A wider, corridor-wide assessment of impacts would have avoided many likely problems. What happens when the working alignment has to be moved (for example to avoid one of the historic cemeteries or fragile resources that are not plotted on the DEIS maps)? Will it be necessary to redo the DEIS for archaeology impacts whenever the alignment shifts? This seems to be a required course of action since doing otherwise would mean that the recorded archaeological resources in the "revised alignment" would be ignored in project decisions.

A fourth, related set of questions concerning impact study of the corridors vs. the alignments is that the Tier 1 Record of Decision (ROD) is to approve a single, selected corridor. "The Tier 1 ROD will not select a specific alignment within that corridor." (DEIS, p. 2) But the DEIS for archaeology addresses the "working alignments" (App. M) rather than the wider

corridors, indicating that there are already-selected alignments within the corridors. Thus, the archaeology impact study indicates that alignments have already been chosen prior to the DEIS. Further, why are the potentially impacted recorded historic sites enumerated for the width of the corridors, but the likely impacted archaeological sites are tabulated only for the working alignments, when NHPA and Sec. 106 applies to both historic and archaeological sites?

Finally, related to a programmatic agreement on mitigation of impacts to historic and archaeological resources "at the conclusion of Tier 1" (DEIS, p. 2), how is mitigation of archaeological impacts to be designed if the impacted resources are not identified and evaluated until Tier 2? (Can mitigation be planned when you don't even know the resources being impacted?) How can potential impacts to National Register-eligible properties (FHWA 4[f])) be properly considered after the Record of Decision, if the surveys are not done and the site not even identified or evaluated until after that decision? Will consulting parties who have participated under Section 106 be able to participate in the development of programmatic agreements? Will additional consulting parties be able to participate?

Answers to these legal and procedural questions are very important, and hopefully may be found in environmental or historic preservation case law and best practices in neighboring states. We wish to focus in parts 2 and 3 of our comment on archaeological impacts as presented in the DEIS and as they are required to be studied by multiple federal laws. Since we are archaeologists, not lawyers, we can only raise legal and procedural questions, not answer them.

2. Archaeological Data.

A. Data presented, and the nature of the data. The archaeological site data resulting from a records/literature review for the five 2-mile wide study bands or corridors and 12 alignments being considered is presented as a list of site reference numbers and site cultural periods for the working alignments (Appendix M). This list is abstracted from a larger list of recorded archaeological sites in the corridors that is not presented but which numbers 2,088 prehistoric and historic archaeological sites (App. M, p. 14). The reported archaeological site information was derived from archaeological surveys made prior to the DEIS but not for the DEIS. Probably less than 10 per cent of the land in the various corridors, or for that matter the alternate working alignments, has been surveyed for archaeological resources by discovery methods that meet modern standards. Many of the previous studies reporting sites in these areas are of uneven quality, and data were not reported in a manner that could be used to evaluate resource impacts or to assess archaeological significance or National Register eligibility. Consequently, the lists provided in the DEIS present neither (i) a complete inventory of archaeological resources in the alternate alignments, nor (ii) a data set compiled as a systematic sample of the areas in the routes that could be used for comparing the likely archaeological impacts in the project's alternate routes. In brief, data collection for the archaeological impact study in the DEIS is opportunistic rather than scientific. Scientifically based survey samples are routinely used in archaeological impact studies to choose among alternate construction areas.

B. Data missing? Part 1. In the 1990s, Bernardin Lochmueller & Associates ("BLA") carried out, with their archaeological consultants, field surveys of portions of the project's alternative routes to discover archaeological sites. This information was conveyed at a public meeting in May 1996 about the project at Tri North Middle School in Bloomington by Mr. Thomas Beard, of Landmark Archaeological Consultants, employed by BLA. Information from

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those surveys has not been included in the DEIS. Why not?

Further, we have been told that the report of investigations from those surveys was withdrawn from the historic preservation review process at the State Historic Preservation Office after that report was submitted for review. We do not know who withdrew the report. But why was the report withdrawn, and why was the survey data not included in the DEIS?

C. Data missing or excluded, Part 2. Unrelated to the DEIS, we have carried our professional work in several small portions of one working alignment, and so had unique expertise to assess how the DEIS studied the likely impacts to previously recorded archaeological resources in this limited area. Over a distance of three miles, four previously recorded archaeological sites are located in the Alternate 3 working alignment and were omitted from the DEIS! Our surveys covered only a small part of the alignment in this 3-mile stretch, so this is a particularly shocking number. Moreover, the sites were recorded more than 20 years ago. How many other parts of Alternate 3 have excluded data? Which other alignments have excluded data? Is 4 archeological sites per 3 linear miles an average figure for the data that was excluded from study? What types of archaeological sites were excluded from consideration?

Three of the missing sites in the area we studied are prehistoric (12-MO-584, 12-MO-588, and 12-GR-744). 12-MO-588 is little known. However, 12-MO-584 is identified as PaleoIndian, and 12-GR-744 is known to have multiple Archaic and Woodland components and densities of material that indicate a high probability of archaeological features still present below the plow zone. Neither of the sites is located in a floodplain. Both 12-MO-584 and 12-GR-744 would require intensive archaeological survey and test excavations to evaluate their National Register status.

The fourth site in the alignment that was missed by the DEIS is 12-MO-158, the furnace structure at a complex known as the Virginia Ironworks. It is located in Alternate 3A-B-C, southwest of Bloomington. The ironworks operated from about 1839-1844. The furnace structure has long been recorded by geologists and archaeologists, but our surveys in 2001-2002 revealed multiple related features and sites. Thus, the Virginia Ironworks is the focal point of a larger complex of historic archaeological features that relate to Monroe County's earliest manufacturing industry. In addition to the furnace itself, the complex includes iron mines, limestone quarries, ore and charcoal processing and stockpiling features, structure foundations, house sites (the original Freeland homestead, and then the Adams homestead), former roads, a cemetery (the Adams Cemetery), a house foundation, and in particular extensive sealed archaeological deposits associated with the people who worked at the iron furnace. Many of these archaeological and historic features and structures are also in the alignment, but none are shown on DEIS maps, even though the cemetery and the Freeland-Adams house site had been previously recorded. An existing, occupied structure at the Freeland-Adams house site is shown on the DEIS map, but this is not reported in the DEIS to be a historic structure. That structure, recorded as Indian Creek Township 009 in the published Interim Monroe County Survey of Historic Sites, was built ca. 1880 after the Freeland-Adams house was destroyed by fire. The Virginia Ironworks complex (VIW) is being proposed as a historic district. Its National Register status, when determined, should reference regional significance for this example of pre-Civil War iron industry. However, as the only surviving early iron furnace in Indiana, the "VIW" historic district can also be considered to have state-wide significance.

In short, the data presented fall far short of informing about the likely presence of archaeological resources in the alternate routes, and some data appear to have been excluded from the study. The excluded or missing data, of course, has considerable bearing on data manipulations, or interpretations made to assess likely archaeological impacts.

3. Interpretations of data.

To compare likely impacts among the project alternatives, the DEIS uses (A) predictions about archaeological site densities and (B) modeling or predictions of locations of likely National Register quality sites.

A. Predicted Archaeological Site Densities. One of the DEIS's manipulations or interpretations of the archaeological data is projection (or prediction) of archaeological site density, using the estimated acreage required for construction of the various alternative routes. The density figure employed is one site for every six acres. The DEIS cites a study by Gary Ellis and others (1989), which refers to a reconnaissance survey in Greene County, for this particular density figure. The DEIS claims this figure to be "a site density predictive model for southwestern Indiana" (App. M, p. 24), but the cited study does not ascribe such lofty status to the particular figure of 1 site per 6 acres. Given the environmental variability in Greene County, let alone other parts of southwestern Indiana, archaeologists who have worked in the region know well that site density varies greatly with respect to the diverse environmental features present. Further, reports indicating variable archaeological site density in the southwestern Indiana region were cited in the DEIS, and others are on file at the Indiana Division of Historic Preservation and Archaeology and were available to the authors of the DEIS.

The use of a single density measure to compare the likely impacts to archaeological resources of the various alternatives, which contain not only diverse environmental features but also features not present in Greene County, is scientifically, statistically, and logically indefensible. Therefore, the projections in Table 5.13-3 in the DEIS on the estimated density and archaeological sites that would be affected in the various alternate routes are meaningless numbers. These cannot be used to draw any conclusions or make decisions about likely archaeological impacts among the alternate routes because the numbers are not "information."

B. Prediction of Areas Where National Register of Historic Places (NRHP) Eligible Sites are Likely. The DEIS notes that archaeological resources have been destroyed or severely compromised by plowing, erosion, and modern constructions, but that floodplains of rivers and streams contain stratified prehistoric and historic archaeological resources. The DEIS claims (p. 26), "It is in the floodplains that much of our remaining undiscovered records of the past are to be found."

As archaeologists who have investigated a number of deeply buried archaeological sites in floodplains, and long argued for subsurface surveys, coring, and geoarchaeological expertise to discover such sites, we find that statement unsupportable. In fact, "much" of our archaeological heritage is represented in mounds, cemeteries, earthworks, villages, farmsteads, and rockshelters, which are not in floodplains. While such sites are not covered by flood deposited sediments and often are shallow, a high proportion of these sites have intact cultural deposits that extend below the reach of the plow (e.g., structural features, storage facilities, refuse disposal areas, burial pits, etc.) or have not been affected by plowing and other recent

land-alternations. Such sites make up a high percentage of the NHRP-eligible archaeological sites in Indiana and throughout the Midwestern U.S., and some number of them can be expected to be present in the alternative routes. In fact, we have been involved in the excavation of more than 41 such sites in Indiana, and 34 others in Ohio, Kentucky, Illinois, and Wisconsin. On the other hand, systematic archaeological survey of extensive outcrops of floodplain sediments in the Wabash and White River valleys, as well as others, have indicated that sites are far less common in these floodplain locales than they are in exposed outcrops of Ohio Valley floodplains. It would be gross error to focus archaeological evaluation strategies, or surveys and preservation planning, on the floodplains alone, since that would produce a highly skewed representation of the 12,000-year history of human experience in Indiana and our cultural heritage.

The DEIS promotes its "newly created GIS" for the I-69 project, but doesn't ever use the power of the GIS data set in the archaeological analysis. To be fair, the DEIS says (App. M, p. 27) "The computerization of archaeological information combined with environmental geographical data and modeling software provides endless possibilities that have *only begun* (emphasis added) to be explored." But decisions on the highway are due in about three months, and information about archaeological impacts is needed before these decisions are made. Why is "exploration" only beginning at the time the DEIS is being released, and not before?

Further, we are not told in the DEIS what attributes of archaeological sites would make them NRHP-eligible, nor what procedures or studies were used to select the variables used in making predictions about their location patterns. Nor are we given the statistics to judge how predictions were evaluated and what levels of statistical confidence were achieved. We can only guess where the attributes and variables came from. Are these from systematic analysis of records of NHRP-eligible sites or from the hunches, ideas, or collective experience of archaeological experts? Or are they from archaeologists who – reportedly – stuck pins in maps based solely on their intuitions about archaeological/environmental correlations?

Moreover, the so-called modeling in the DEIS uses opportunistic archaeological survey data rather than scientific survey data, as we noted above in our section 1. Regardless of the type of GIS manipulation or the (unknown) statistical procedures employed, the type of archaeological data utilized is not appropriate for correlating archeological and environmental variables or predicting likely impacts. Further, no predictive modeling statistics are offered in the DEIS to inform about correlation of archaeological and environmental variables or probability of impacts. Even if a computerized archaeological database, a GIS, a set of maps, and a series of statements is claimed to be a modeling tool, it is not necessarily a model – nor can it be reliably used as such in making decisions – if the steps used in developing the "model" are not scientifically sound. Nothing in the DEIS would support a conclusion that the supposed model is sound.

Predictive modeling is not a new science – not even in archaeology – but it is a science. When applied to a particular problem – such as choosing among alternative construction plans – the assumptions about data, analytical and statistical methods, and all the results must be described in order for the model to be evaluated. In the DEIS this was not done. Very clearly, the DEIS presents neither a model nor anything like a predictive statement that can be substantiated in any way.

So, where does the DEIS predict archaeological sites of NRHP eligibility to be located? It's hard to say, because the DEIS is silent. The DEIS presents a map showing "a simple correlation ... presented with our newly created GIS modeling toolkit to illustrate graphically where the high probability of National Register of Historic Places Eligible sites are most likely to be found (Figure 2)" (App. M, p. 28). What is being correlated? Correlation implies two or more variables. What variables? Correlation is also a statistical statement. Where are the statistics that inform us about the basis for the prediction, and the confidence that we can have in such prediction?

Maybe the dark-shaded "predicted areas of potentially eligible archaeological sites" are where the alternate routes cross floodplains, but a simple glance at other maps shows this is not the case for all dark areas. Why is there a large section of "dark shading" along Alternate 1, from Vincennes to the White River? This long tract is certainly not a floodplain, but we have no hint why this large area was singled out. Will this supposed concentration of so-called "predicted areas of potentially eligible archaeological sites" make Alternate 1 a less viable construction alternative? Maps like those in Figure 2 cannot provide sufficient information for any level of decision-making about project alternatives with respect to archaeological impacts because the DEIS and its appendices do not allow the conclusion that they were developed from proper assumptions and methods. Therefore, any decisions based on this type of approach to considering archaeological resource impacts can be challenged as uninformed and scientifically unsound.

Last but not least, the DEIS claims (App. M, p.27), "Although not presented here in this public document to protect specific local cultural resources, the model can easily be zoomed in ... to refine our area of high probability to specific soil types or characteristics.., slope, aspect, or distance to water." But it is not necessary to compromise protection of archaeological resources in order to present the data used in developing and testing a model that predicts the locations of NRHP-eligible archaeological sites, so the claim of "protection" is not an excuse for failing to describe the essential elements of a predictive model. A map of properly developed and tested correlations would not have to be any more specific than what is illustrated in Figure 2 for the public to be able to evaluate the study of archaeological impacts.

To summarize, the DEIS's data interpretations of archaeological site densities are unsupportable, and its so-called "predicted areas of potentially eligible archaeological sites" are not scientifically valid predictive statements. Regardless of having a GIS for the DEIS, and something characterized as a modeling tool, what is presented is not a model of anything.

Because the DEIS missed or excluded previously recorded archaeological site data, including archaeological survey data generated in the 1990s for I-69 alternate routes, and inappropriately used site density estimates and modeling of likely site locations, the impact study is seriously flawed and not usable as a basis for decisions. The clearest example of the failure of the approach used in the DEIS is in a small portion of Alternate 3, where we have first hand information for the working alignment. But in this limited area, neither the listings of previously recorded sites or modeling tell us about likely impacts to the historically important pre-Civil War Virginia Ironworks complex – even though the furnace structure, a historic house, and a historic cemetery were all previously recorded. For all the alternate routes, we can have no confidence that the DEIS reliably or adequately informs us about the likely presence and types of

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archaeological impacts for the alternate routes, but we can be certain that the data that were misused for predictions and so-called modeling of likely impacts to archeological resources.

We believe the Indiana Department of Transportation, the Indiana SHPO and Division of Historic Preservation and Archaeology, and the taxpayers of Indiana were poorly served by the archaeological study that BLA and its consultants have carried out for the I-69 extension project. Across the country, high-quality archaeological studies have been submitted to SHPO offices and are being done in advance of highway construction under NEPA and NHPA and in accordance with established FHWA requirements and practices. The I-69 extension project and the people of Indiana deserve nothing less, especially given the high level of interest in archaeology and historic preservation in this state. It is a sad note indeed that – after so many years of study for the I-69 extension project – there is truly nothing in this DEIS of either substance or sound practice to inform decision-makers and the public about the types, amounts, and locations of archaeological impacts in the alternate routes. How, then, can the people who will select the alternate for construction take into account archaeological impacts and minimize harm to these heritage resources?

Sincerely,

Patrick J. Munson
(Associate Professor, Department of Anthropology, Indiana University)

Cheryl Ann Munson
(Assistant Scientist, Department of Anthropology, Indiana University)

cc: Advisory Council on Historic Preservation
Indiana State Historic Preservation Officer
Historic Landmarks Foundation of Indiana
Monroe County Commissioners
Monroe County Council
Monroe County Historic Preservation Board
Monroe County Historical Society

Attachment D

Maryland Ridge Application for National Registry of Historic Places

November 1, 2002

Frank D. Hurdis, Jr.
Chief of Registration and Survey
Indiana Department of Natural Resources,
Division of Historic Preservation and Archaeology
402 W. Washington Street, W274
Indianapolis, Indiana 46204-2739

Dear Mr. Hurdis,

The purpose of this letter is to notify the appropriate agencies, including the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, of our intent to submit an application for the community historically known as "Maryland Ridge" to the National Register of Historic Places as a Cultural Landscape and Rural Historic District. The significance of the Maryland Ridge Community to state and national historical and archaeological preservationists is found in its unequalled history as an industrial and agricultural community founded, cleared, worked, and developed cooperatively by early black, white and freed black settlers as a part of the anti-slavery movement of the early nineteenth century history of the State of Indiana and the United States of America. The community is located in a three to seven mile wide band along the Monroe and Greene County line in South-Central Indiana, and includes roughly the vicinity of and between the towns of Elwren, Stanford, and Buena Vista in Western Monroe County, and Hendricksville, Solsberry, and Hobbieville in Eastern Greene County. Although it appears that the actual legitimate landscape based on the period of settlement and development encompasses no less than 75 sections of land and 48,000 acres, we intend to focus primarily on the core area of settlement and development, along the old Spencer-Springville Road, which would allow a more workable area of approximately 25,000 acres. 5.13

Placement of "The Maryland Ridge Community" as a Cultural Landscape and Rural Historic District designation on the National Register of Historic Places would lend recognition as well as preservation to an incredible resource irreplaceable in our local, State, and National history as it may be counted among the very rare, and possibly only, remaining early examples of the uniquely American diversity combining anti-slavery, industrial, agricultural, and religious movements into a single community (Diane Perrine Coon, Historian of African-American Agricultural and Industrial Settlements in Indiana). The quality of significance to American history, archaeology, and culture is present throughout the district and is communicated through sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, feeling, and association. We believe these will well meet the criteria for evaluation of the significance of archeological properties and rural historic districts: Association with events that have made a significant contribution to the broad patterns of American history; Association with the lives of persons significant in our past; Embodiment of the distinctive characteristics of a type, period, method of construction, representing a significant and distinguishable entity whose components may lack individual distinction; And that will yield information important in the history of the anti-slavery, agricultural, industrial, and religious movements of the United States. Further, the district includes the deep-rooted history of development, and continued existence of a unique community whose distinct cultural heritage has survived more than 18[illegible] years through the lives and culture of the direct descendants of the original settlers who continue to comprise the vast majority of property owners and community members. 5.13

First, the significance of the historic and cultural anomaly known as Maryland Ridge is communicated archaeologically in the vast resources which remain from the period of settlement, 1816 to 1839, throughout the community. These include the limestone and iron ore mines; the actual Randolph Ross and Son's Virginia Iron Works blast iron furnace; artifacts including the cast iron gear by which the blower was operated, and numerous products scattered throughout the community; as well as the home sites of Randolph Ross, Hardy Sparks, Robert Roberts and as many as forty other pioneers thus documented and believed to be associated with the Iron Works. Included in the community are the homesteads and sites of Benjamin Freeland, Judge John Sedwick, Daniel Rawlings, Zebulon Alexander, and other abolitionists bringing former slaves from Calvert County, Maryland. These are surrounded by the sites of the homes, quarters, and cemeteries of the freed slaves they accompanied; numerous farms and properties cleared and built communally by white and black settlers together; original county and industrial roadbeds displaying economic, immigration, and social patterns; and local farming roads and agricultural patterns, many still utilized communally which continue to display and communicate distinct agricultural, industrial, and economic relationships; and cultural paradigms which have contributed to the community's success, cohesiveness, and longevity. Further archaeological evidence would include objects and artifacts found extensively at various sites densely scattered throughout the community, and which are likely to yield vital information concerning each of the movements during the period of settlement. 5.13

Second, application to the National Register of Historic Places as a Cultural Landscape and Rural Historic District will include the period of community development from 1840 to 1953 displayed archaeologically, culturally, and structurally throughout the community and visible in no less than 142 homesteads and farmsteads, thus far documented. Again, each cleared and built by a combination of the original settlers, including freed slaves and free black settlers, and their descendants. Existing sites include structures such as houses; barns; outbuildings; spring houses; hand hewn sandstone foundations, cellars, walls, wells, and cisterns; storefronts; churches; etc. These would also include the continuation of culturally distinct interdependent industrial, farming, and social paradigms and communal relationships as displayed through successive periods and as adapted to cultural influences and industrial innovations and technologies: The period from 1840 to 1859 evidences the collapse of the canal system in the United States, and the effects of the Mexican-American War which include the founding of the town of Buena Vista, and the 1850 rewriting of the Indiana Constitution, including the addition of the Thirteenth Amendment purposefully designed to deter further free and freed black settlement; the period from 1860 to 1879 which includes the economic and social metamorphosis ignited by the Civil War on farming and religious practices and which display immediate affects concerning the changing role of women in community affairs, as well as diverse belief systems surrounding hatred, prejudice, and race as evidenced by the onset of the Ku Klux Klan in neighboring communities and its effects on both black and white community and cultural development; The period from 1880 to 1909 and the effect of the Illinois Central Railroad on farming, social, and community development; the period from 1910 to 1929 and the effects of World War I and modernization which followed; and the period from 1930 to 1953 including the affects of the gasoline engine, the great depression, the building of three state highways; the effects of World War II, and the further advancement of the role of women in the community and the workforce; and the affects of the decline of rail. Objects and artifacts which display and communicate significant agricultural, industrial, and social change through these periods include a multiplicity of nineteenth and early twentieth century farming and industrial equipment found at each site. Larger items consist of horse drawn rakes, seed drills, successive plows, thrashers, binders, steam engines, etc from throughout the nineteenth and early twentieth century. 5.13

Remaining histories and record keeping regarding families and sites provide invaluable information concerning further trends and innovations as well as other community based social, business, and farming developments and practices. Primary and secondary sources evidencing the changing role of women from the post Civil War period through the post World War II transformation of the American middle class. (Later, post-significance, periods will evidence the changing role of women in the Maryland Ridge Community to the predominance of equal and/or primary heads of households).

Third, the application will include the homes and ancestral homesteads of significant persons associated with Indiana and U.S. culture and history as found in the Maryland Ridge Community: Marion Blair, who painted the portrait of Indiana Governor Oliver Perry Morton during the American Civil War, and portrait of Abraham Lincoln from the funeral bier; the history and home of Mae Lee Everett, the great grand daughter of General Robert E. Lee, whom the community rescued from institutionalization, caring for her until her death in 1970. Ancestral homes would include the family farm and homesteads of the Indiana writer Booth Tarkington; the home and family farmstead of country music legend Joe Edwards, and the family farmstead and ancestral home of Hoagy Carmichael. 5.13

Discussion of the Maryland Ridge period of settlement will describe four primary migrations of Eastern seaboard Euro-American and African-American settlers between 1816 and 1839 along what had been the Spencer-Springville Road near the Monroe and Greene County Line Road from Owen County South to Lawrence County. It appears that the first three migrations to the Maryland Ridge area were a direct result of the anti-slavery sentiment building in the Southern and Eastern Seaboard States at the time, and were each directly tied to Calvert County, Maryland. While the fourth and final movement was directly due to the presence of pre-historic iron ore deposits and mines along Indian Creek, located in the heart of the community, further community development appears to have occurred as a direct result of the Virginia Iron Works. Even this group appears to have ties with the abolitionists of Calvert County, Maryland. The general history of settlement is as follows:

The Benjamin and Sarah Richardson Freeland family had been wealthy Maryland shipbuilders. In 1816, because of strong anti-slavery principles, the family decided to free all 125 of their slaves and immigrate to Indiana as it was designated a free territory by the Northwest Ordinance of 1787. Six families of former slaves accompanied them along with other white abolitionists including Joseph and Lydia Richardson Freeland, Robert and Jane Freeland, George and Rebecca Freeland Adams, Elizabeth Adams (George's Mother), Judge John Sedwick, Daniel and Rebecca Rawlings, Zebulon and Mary Whaley Alexander, and possibly others. Evidence suggests that other former slaves and freed families may have accompanied the Freeland Party. Family, local, and county histories indicate that an agreement was made between the white settlers of the Freeland Party and the black settlers such that the black settlers would settle with the Freeland Party in the new community for a period of five years to help clear the land for farming in repayment for their passage to Indiana. While all of the black settlers appear to have been released from their agreements after the first year, it seems at least some chose to remain in the community for the remainder of their lives. This is supported by a combination of factors including census records, written and oral histories, and the presence of the graves of freed black settlers in "white" family cemeteries, as is the case in the Zebulon and Mary Whaley Alexander Cemetery; or "black" cemeteries long a part of the oral histories of such properties as Daniel and Rebecca Rawlings. Additional cemeteries may be eventually documented with other settlers associated with the Freeland Party.

According to census records, and Roger Peterson, African Americans in Owen County 1819-1859, free black households in the 1830 Greene County Census include: Clayborn Bunch, with a household of 10 persons; Israel Bunch, 3 persons; James Bunch, 1 person; Julius Bunch, 2 persons; York Jones, 4 persons; John Michel, 8 persons; Shadrack Moore, 7 persons, and Samuel Nolen, 6 persons. Freed black households in the 1830 Monroe County Census include Notty Baker, 4 persons; Jordon Cornet, 4 persons; Andrew Ferguson, 2 persons; John M. Goings, 4 persons; Simeon M. Goings, 14 persons; John M. Roberts, 11 persons; Dickson Stewart, 2 persons; Evin Stewart, 8 persons; and Hillah M. Woodfork, 8 persons. By 1840, the number of "free black heads of households" had actually increased in Greene County, while decreasing in Monroe.

Further, state, county, and family histories concur that Joseph Freeland founded Freedom Indiana in Owen County in 1834 as a settlement for black and freed black settlers. Although Freedom was originally founded as "Freeland" Indiana, the name was soon changed to "Freedom" Indiana. It is not insignificant to point out that not all black settlers in Indiana were former slaves, and that it is important to note many of the original land grants issued by the United States to settlers in Owen County were in fact issued to free black settlers who paid as much as $1000 for a tract of land. Land grants to black female settlers were also recorded. Owen County census data records that many black settlers migrated from Greene County. Simultaneously, after the land clearing agreement between the freed black settlers and the Freeland Party was concluded, six families of black settlers appear in the Owen County Census as having migrated from Maryland in 1817, and having entered Owen County in 1818. As the U.S. Census was conducted only every ten years, it is likely that countless other black (and White) settlers came and went throughout the early nineteenth century period of the community.

The second and largest migration of settlers, the Carmichael Party, to the area appears to have originated in 1826 from Surry and Stokes Counties, North Carolina (Stokes County, N.C. was formed from Surry County, N.C. in 1789). Two things are immediately important to note: First, of the great number of these families to immigrate to Indiana, many appear to have direct ties to Calvert County, Maryland in at least one of three basic forms: they had previously lived in Calvert County, had brothers and sisters in Calvert County, or had married a spouse in or from Calvert County, Maryland. Secondly, many of the family histories and genealogies specifically mention anti-slavery feelings among these settlers who migrated to Indiana. This migration appears to have included the families of Archibald and Martha Pennington Carmichael II, Alexander and Mary Ann Holder Carmichael, Joseph B. and Elizabeth Holder Carmichael, Richard and Mary Graves Carmichael, Adam and Elizabeth Carmichael Fulk, Hugh McWhorton and Martha J. Carmichael Cullison Dobson, William and Sarah Carmichael Martindale, John B. and Elizabeth Carmichael Martindale, David and Frances Weaver, Peter and Lydia Teague Graves, Charles "Carl" and Marla Margaret Krause (Crouse) Holder, John and Elizabeth Breeden Gardner, Isaac and Rebecca Burch Gardner, John and Mary (Shear) Sharr, William Hall (from Maryland), William and Delilah Burch Edwards, George Edwards, William and Lucinda Edwards Carter, San Shelton, Pleasant Fossett, Fuel Burch, William Inman, James and Sanford Stone, Thomas and Nancy Lister Oliphant, James and Christiana Crane, Richard Crane, Charles and Mary Nelson Foddrill, John and Magdelinne Baker Foddrill, James and Brazilla Gordon King, and Charles Burch. While the largest portion of this group migrated together in 1826 there appears to be a 2-4 year period over which a few of the families completed the trip having worked or lived briefly in Virginia, Kentucky, and Tennessee.

Census data in Greene and Owen counties include a great number of freed blacks and black settlers also from North Carolina (including Surry and Stokes Counties), or also having traveled through Virginia, Kentucky, and Tennessee, prior to arrival in Indiana. According to the historian on African American immigration and settlement in Indiana, Diane Perrine Coon, it is likely that freed black settlers accompanied the white settlers from North Carolina. Although we are pursuing information concerning the presence of the descendants of the African American settlers in the Bloomington and Indianapolis areas, like other black settlers of the time, it appears that many left Indiana sometime after the adoption of Article 13 to the Indiana Constitution.

The third migration of settlers occurred in 1834 from Calvert County, Maryland. This party was led by the Reverend Malden and Eliza Cullenbaugh Baker, and included the families of Thomas and Nicea Greaves Breeden, William and Christiana Greaves Fowler, Moses and Drusilla Greaves Whaley, Joseph and Sophia Jane Hall Whaley, John and Mary Whaley, Asa C. and Julian Dobson Whaley, Samuel Hite, Cleverly Day, and Benjamin Coster. This migration appears to be the direct result of the schism in the Methodist Church in the United States: In 1834, an open and incredibly heated disagreement split the Methodist Episcopal Church in the United States between traditional Methodists Episcopals (who believed in a strong centralized conference in Baltimore, and a decidedly pro-slavery doctrine); and a group calling themselves Methodist Protestants (who protested a strong centralized conference in favor of a stronger lay representation in the governing of church affairs; and who were passionately anti-slavery). This schism over slavery was common throughout churches in the South at the time. Upon arrival in the free territory in Indiana, the group began holding religious services calling themselves the Calvert Society. From 1834 to 1839 the Calvert Society met throughout the community in their own homes and in the homes of friends and family members who had previously arrived from Maryland and North Carolina.

In 1839 the decision was made to build a permanent structure. According to church records there was a debate as to whether to build the church in Stanford or "on the hill" West of Stanford. The hill was chosen, and in 1839 John and Mary Whaley deeded the property for the Church and Cemetery to the trustees John Gardner, Isaac Gardner, Samuel Hite, Cleverly Day, and Moses Whaley, and the first log church in the area was built. The Calvert Society, apparently feeling they were on the right side of the anti-slavery issue, kept the traditional name of the Methodist Church, calling it the Methodist Episcopal Church. The early history of the Maryland Ridge church includes a story of a group of "Indians" who had been camped along White River near Bloomfield during the following winter. They had come to the Church during a terrible blizzard and asked to stay until the blizzard had passed in order to insure their families' survival. This is important to note because while the Church was the first in the community and the area, it was not the first built in the county and other churches would have been closer, but the "Indians" appeared to believe this church would take them in. Church records tell us that for three to four nights, the Indians stayed in the Church, and while the women and children slept behind blankets hung near the fireplace, the men, both Indians and settlers, stayed up drinking and dancing each night with one Indian staying awake and sober to watch over the group. Such was the reputation and the nature of the settlers of the Maryland Ridge community. (Although pre and post contact campsites have apparently been identified in the Maryland Ridge vicinity, the pursuit of historical or archeological evidence of Native Americans in the prehistory and history of the community has yet to be undertaken as a potential resource for pre or post contact data). In 1870 the original log church burned, and a second church was built on the site. This church continues to be worshiped in to this day.

The fourth and final group arrived in 1839 from Virginia. This group was led by Randolph Ross who built the Randolph Ross and Son's Virginia Iron Works which, together with the Calvert Society's church, likely became a part of the cultural epicenter and touchstone of the early Maryland Ridge Community. Along Indian Creek on the very edge of a field cleared by both black and white settlers of the Freeland Party, and purchased on contract from George Adams, Benjamin Freeland's son-in-law, Ross built the blast iron furnace. According to the abstract of the present owner, Benjamin Freeland deeded the property to his son-in-law George Adams for his iron works venture. Adams then sold the property on contract to Ross. In 1839 Randolph Ross was land granted or bought on contract a total of 156 acres along Indian Creek. By 1840 he was the largest single tax payer in both Greene and Monroe Counties. In 1841 while most settlers paid $4.00 to $8.00 dollars on average in taxes, Randolph Ross paid $52.25 and in 1842 paid $100.49 in taxes. While his property worth was estimated at $468.00, the improvements made (construction of the blast iron furnace on Indian Creek) increased his property worth to $6360.00, combined with his personal worth of $1600.00, his net taxable worth was $8428.00. This is important to note as it reinforces the belief that not only was the Virginia Iron Works the only early industrial site of its kind in at least this part of Indiana, it was also an important aspect in the development of the community as it employed many settlers, possibly both black and white, from throughout the community during both its construction and operation. Early settlers employed by the Virginia Iron Works may only eventually be confirmed or disproved by the archaeological examination of the sites of persons associated with the blast iron furnace.

The history of Indian Creek Township reports that Randolph Ross brought "a few experienced men" from Virginia, probably including Samuel Ross, Hardy Hannibal Sparks, Asa Blankenship, Henry Homburg, Jackson McGee, and Levin Adams (likely a close relative to George Adams), and employed as many as 30 or more other men from throughout the community. It appears that Ross may have been the nephew or son of David Ross, who was the largest and most famous Iron Works owner in Virginia, who had the reputation of making the best iron in the United States at the time. David Ross's Oxford Iron Works was the major supplier of armaments for the American Army during the War of 1812. It is also known that the $20000.00 necessary for incorporation was supplied by "Eastern investors".

Although it seems likely, by default of proximity, it is unknown whether or not free or freed blacks were employed by Randolph Ross in Indiana, at this time. However, concerning such speculation it is important to note that the Virginia Iron Works is located on the original Freeland property which is believed to include remains of the homes of the freed blacks which accompanied the Freelands from Calvert County, Maryland. At this time, it would also be purely speculation that Randolph Ross left Virginia for the free state of Indiana, due to any anti-slavery inclinations or motivations other than the presence of iron ore. However, it is well known that David Ross "employed" 240 slaves supervised, by white overseers, in the Oxford Iron Works in Virginia. We further know that Randolph Ross's operations were very similar to those of David Ross in Virginia. These included the ownership of the actual iron ore mines, the same specific limestone types necessary in the smelting process of iron ore, the specific types of trees found in the immediate area necessary in the production of charcoal for the furnace (much of the charcoal can still be seen covering the bluff near the remains of the furnace, 160 years later), and the production of tools, pots, spiders, etc as well as the pig iron bars that were shipped by wagon to Louisville and Vincennes.

Concerning the impact of the Virginia Iron Works on the Maryland Ridge Community, while the specific groupings of annual land grants throughout the 1830's suggest communal organization, there is a significantly higher number of land grants recorded on the same day, October 1, 1840 throughout the entire community. This may suggest that as the community expanded either the settlers suddenly had the manpower necessary to clear and improve their properties in order to apply for, often additional, land grants by paying minimal filing fees, or each grantee suddenly had the money to buy the properties at $1.25 per acre. This may also be due to the opportunities provided by the Virginia Iron Works at the same time. Further, at least two cemeteries exist in the immediate area and include the graves of settlers from throughout the far reaches of the community who were directly associated with the Virginia Iron Works, Freeland Party, and Calvert Society. This may be suggestive of the importance of the Iron Works to the community, and the developing identity of the early culture.

Application to the National Register of Historic Places as a Cultural Landscape and Rural Historic District will also include a history of the economic and agricultural development of the community. Unlike many rural and industrial communities, the Maryland Ridge Community had no planned or formal center for social or economic development during or after the period of settlement. Rather, business undertakings and cottage industries are found dispersed throughout the community much like the farmsteads were. For example, stoneware, including jugs, jars, and containers, and later, bricks were made in Hendricksville (founded by Fredrick and Elizabeth Ham Hendricks, also from Maryland, in 1831, and was the location of the first Post Office in Beech Creek Township). By 1850 five men were employed in the pottery shop in Hendricksville. During the early period of settlement, hand and horse mills were operated in the community, but the first water mill did not begin operation until the 1840's. The William "Billy" Carter Mill was located along Indian Creek down stream near what later became the town of Buena Vista. The first whiskey shop in the area was located in the community near Stanford. Sources indicate that during election time, many community members avoided the Stanford area due to its reputation. Dispersed throughout the community were also saddlers, blacksmiths, wheelwrights, carpenters, masons, and others. In what may be described as a rural tradition, what developed was a community based system for the provision of products, services, and labor within the community. 5.13

Early agricultural development and farming practices appear to consist of a combination of subsistence and market crops. Although a variety of crops including cattle, pork, corn and wheat were farmed, it appears that as the community developed, and as properties changed hands throughout the community, new owners of a property did not necessarily adapt to the crop previously grown or cultivated on a given property. Oftentimes, a given crop may have followed the various families. Through this practice, specific properties may have been utilized quite differently over time. By default of these cultural farming practices, the cultivation of specific crops on various properties appears to have followed cycles reflective of generational cycles. Therefore, logging may have occurred throughout vastly different areas of the community through time; and the same fields and meadows may have been successively pastured, plowed or timbered quite differently over the successive generations of community ownership and use. While family farming included a subsistence level of farming on each property, community based farming practices were consistently utilized. Crops such as grains and hay were harvested from farm to farm by the same groups of neighbors. This is reflected in the wealth of roads interconnecting many of the farms, and readily seen in the farming practices which continue to be utilized throughout the community today.

Throughout much of the nineteenth and early twentieth centuries, heavy steam powered thrashers were owned by one individual in the community, and successively moved throughout the entire community until each farm needing thrashing would be served. A similar system providing necessary machinery and labor has continued to be utilized throughout the community until the present day. Livestock would be herded or taken to market through a similar process. Neighbors would work together to move each herd until all were moved. This appears most affected by the coming of the railroad as stock pens were placed in Solsberry and Elwren, and the later more significant impact of the use of trucks to move livestock to markets. Similarly, the harvesting of timber was tremendously impacted in the community both by the railroad and later by the use of large trucks in the logging industry. These factors also provide additional insights into the nature of economic, agricultural, and industrial development in the community. Generationally, while some farms may have focused on the production of a specialized crop, like dairy products which were sold throughout the community, subsistence based farms may have sold or taken to market excess produce. For example, many farms had what were called "Sugar Camps". A "camp" consisted of up to several hundred Maple trees which were tapped for sap, and from which were produced maple syrup and a type of brown sugar. Many of these original camps continue to exist, including evidence of the hearths and chimneys where the sap was "cooked down". Like other crops, what was not used by the family was likely sold and traded throughout the community. Similarly, livestock and other produce were traded throughout the community for other goods and services.

Attributes of the natural topography which appear directly related to both settlement and longevity would include the richness and loam of the soil found throughout the immediate area; the alternating steep and rolling hills more easily lending themselves to agricultural use and a long history of generational crop and livestock rotation; the natural intermixture of steeper topography helped to insure the preservation of naturally wooded areas for an ongoing and sustainable long-term development, as well as the later timber production; certain species of indigenous trees were important in the production of charcoal necessary for the operation of the iron works, and accordingly contributed to the community as a choice for the location of the furnace. Lastly, probably among the most important topographical attributes which have contributed immeasurably to the success and longevity of the community are the extraordinary amount of natural springs, which continue to run year round even in the driest of seasons. Documentation of the springs and water tables has been extensive. Thus far, the Indiana Geological Survey has documented approximately sixty karsts and karsts groups including four swallow holes, nineteen springs, and eight caves in roughly nine of the forty sections of property located along the core area of the community. As many as seven springs have been documented on a single farm, while on one neighboring farm was found an artesian spring located on the top of a knoll. The abundance of both limestone and sandstone in the area, utilized in the construction of foundations, wells, cisterns, and chimneys, must be noted. Although specific numbers of nineteenth and twentieth century stone wells have yet to be determined, it appears that there is at least one per farmstead. Specific limestone, as well as iron ore, deposits appear important in the choice of the Maryland Ridge area for the site of the Virginia Iron Works. Contributing to the continuation of the community were the presence of black cherry, walnut, oak, and other hardwoods important in the nineteenth and early twentieth century local furniture and veneer industries. Later the timber industry, present in the community since its founding, became exploited by access to the Illinois Central Railroad. Combined, the attributes of the local environment and topography will likely prove second to culture alone in insuring the survival and longevity of the community.

Methodology will include references to both primary and secondary sources. Primary sources will include U.S. Census data for Greene, Monroe, and Owen Counties, 1820 through 1950; property abstracts and deeds; tax records as provided by county records though the same period; and family letters and records where applicable. Secondary sources will include, written and oral family histories; genealogies including collections from the Indiana Room of the Monroe County and Indiana State Libraries. Assistance will be noted from a variety of professionals and scholars in their respective fields of Indiana history, African-American agriculture and history in Indiana, early industrial settlements in Indiana, early American religious movements, rural vernacular architecture, and the early history of Indiana University as it appears three early community members are listed among the trustees responsible for moving the University from the Indiana Seminary to it's present location. Documentation of sites, objects, artifacts, and properties will include extensive photography and the utilization of the Global Positioning System. Over four hundred photographs have thus far been taken and two copies of each printed. Each photograph is associated with a reference number. Each reference number records a description of the shot and includes the direction from which the photograph is taken. Early roadbeds, both county and local, are entirely mapped using the same system. Also mapped utilizing the GPS are farms believed to be cleared by a combination of black and white settlers; stone mounds following streams and creeks accompanying fields and farmlands; original sections of split-rail fencing which displays evidence of stone foundations, often these display generations of barbed wire strung from older trees along the "worm" of the rail fence. All structures will be noted as contributing or non-contributing. Archaeological sites are documented in like fashion homestead and farmstead foundations from the original period settlement. Countless unmarked private and family cemeteries, including those believed to include black settlers are also photographed and recorded. Lastly, it is important to note that for this project we have the support and permission of the vast majority of property owners in documentation and pursuit for recognition from the National Register of Historic Places as a Cultural Landscape and Rural Historic District.

A rough draft application is currently being pursued. This may take several weeks to complete appropriately and in detail. Throughout this process we plan to work closely with the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, the Indiana Historic Landmarks Foundation, and all other appropriate agencies.

Sincerely,

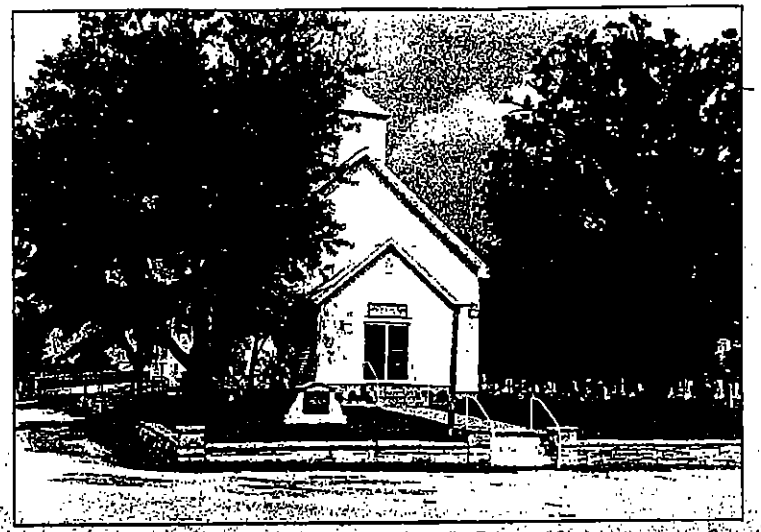
The Maryland Ridge Community

Contributions to date made by,

Dave Abram
Gene and Ruth Askins
Eddie Burch
Bill and Lana Buskirk
Clifford and Mae Buskirk
Bob and Donna Cardwell
Robert Carmichael
Gary and Judy Cobb
George and Beverly Cooper
Jon Cummings
Larry and Marry Dobson
David Dodrill
Tom and Vickie Edington
Jeff and Rachel Fender
Nancy Fender
Tom and Penny Foster
Sandra Fowler
Lucille Fowler
Joan Gardner
Mike Gardner
Phillip Gardner
Brian Garvey
Kathy Gill
Henry Grubb
Brenda Havens
Mike and Kathy Hedrick
Bob and Retha Hedrick
Todd and Marianne Inman
Larry and Marsha Martindale
Herbert and Mildred Martindale
Gary and Barb Milhoan
Harold Moore
Terry Myers
Larry and Linda Patterson
Shelly Patterson
Maxwell Quimby
Steve Quimby
Jim and Michelle Rice
Clyde and Evaleen Sanburn
Edith Sarra
Alexander Scott
Richard and Donetta Sira
Lorraine Sirucek
Ron Siscoe
John Smith and France Knable
Roger Snow
Dianna Gardner Stapleton
Tim and Terri Strauser
Tom and Shirley Sullivan
Rudolf F. Turner
Cleo Vernon
Jody and Wayne Vaught
Jeff and Tracey Wagner
Marvin and Kay Wagner
Mike Wanchik
Bill and Brenda Watkins

cc: John L. Carr, IDNR Division of Historic Preservation; John R. Goss, IDNR Division of Historic Preservation; David L. Isley, Bernardin • Lochmueller & Associates; Dr. James R. Jones III, IDNR Division of Historic Preservation; Tommy Kleckner, Indiana Historic Landmarks Foundation; Andy Knots, Hoosier Environmental Council; J. Bryan Nicol, INDOT; Jon C. Smith, IDNR Division of Historic Preservation; Thomas and Sandra Tokarski, CARR; Curtis Tomak, IDNR Division of Historic Preservation; Linda Weintraut, Weintraut & Associates; J. Reid Williamson, Jr., Indiana Historic Landmarks Foundation

Methodist Episcopal Church

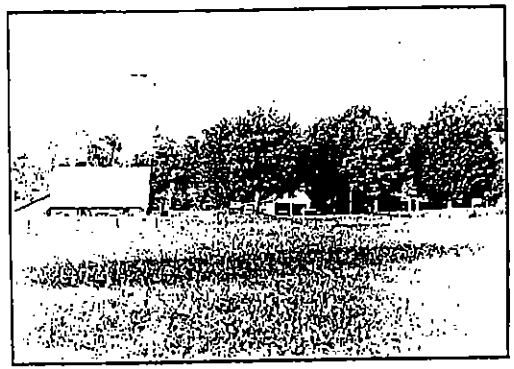


1870 Methodist Church built on the site of the 1839 Methodist Episcopal Church attended by Calvert Society members until 1892

Maryland Ridge Farmsteads

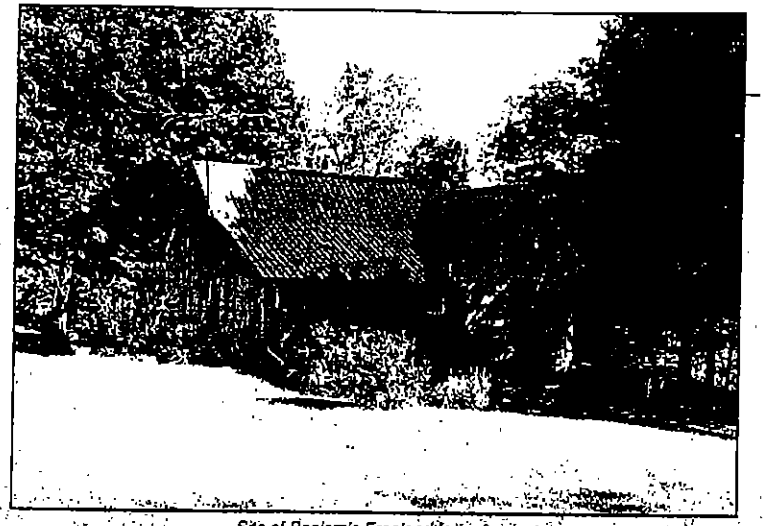
Joseph and Sophia Jane Hall Whaley farmstead built by original settlers on the former site of the Wabash and Erie Canal

Condor farmstead with c.1920 farmhouse and limestone barn. The earlier 19th-century house and barn are still standing

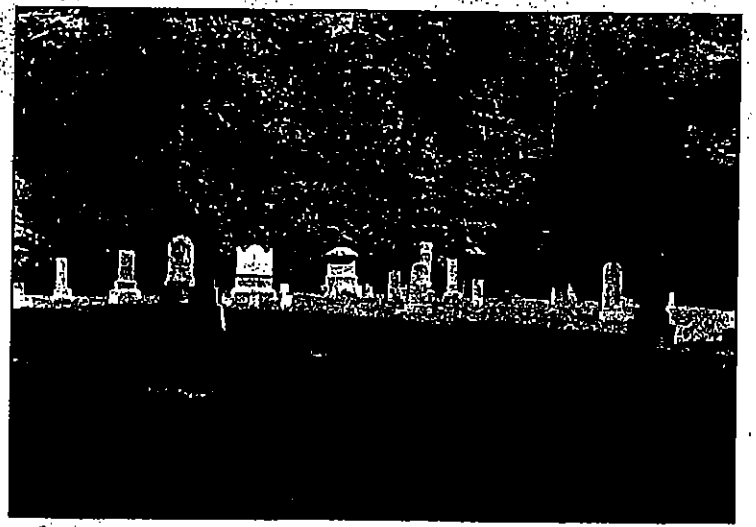


Henry and Catharine Abrams farmstead near Hendricksville

Benjamin Freeland Property



Site of Benjamin Freeland farmstead



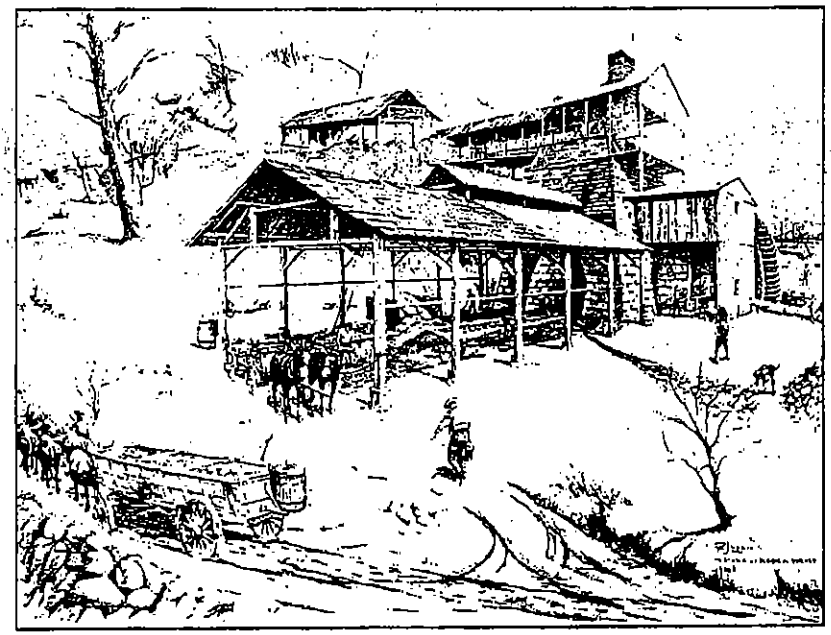
Adams Cemetery: burial grounds of Benjamin and Sarah Richardson Freeland, George Adams, Thomas and Nicea Greaves Breeden, William and Christiana Greaves Fowler and other members of the Calvert Society

Randolph Ross and Son's Virginia Iron Works

View of South wall of blast iron furnace

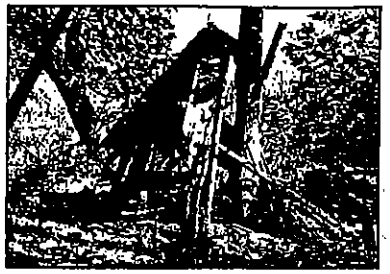
Top of blast iron furnace showing scale

Remains of the gear which operated the blower



Artist rendering of the Randolph Ross and Son's Virginia Iron Works as it would have appeared in 1840

Evidence from Period of Settlement



Remains of Thomas Breeden home

Foundation of Thomas Breeden Barn

Thomas Breeden cistern

150 years of fencing, in the foreground can be seen the "worm" of the split rail fencing; later generations of barbed wire fencing can be seen through older trees, later through Mulberry posts and finally on metal posts

Close-up of older tree (above) showing affects of barbed wire fencing. Similar affects can be seen at greater distances on many trees (right). Although these are from a later period, they are in the "worm" of an earlier split rail fence

Archeological Farmstead Evidence

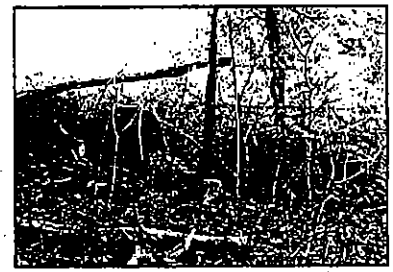
Hand dug sandstone well common throughout Maryland Ridge with many as two or more per farmstead

Foundation stones of Allen Sparks farmstead

Artesian spring on Sparks farmstead

Sandstone embankments bordering fields and creeks are common throughout the community. These were constructed by early settlers while clearing fields to aid in flood and erosion control

Foundation of nineteenth century icehouse



Remains of rock wall along roadbed near Seldom Seen in Elwrenn

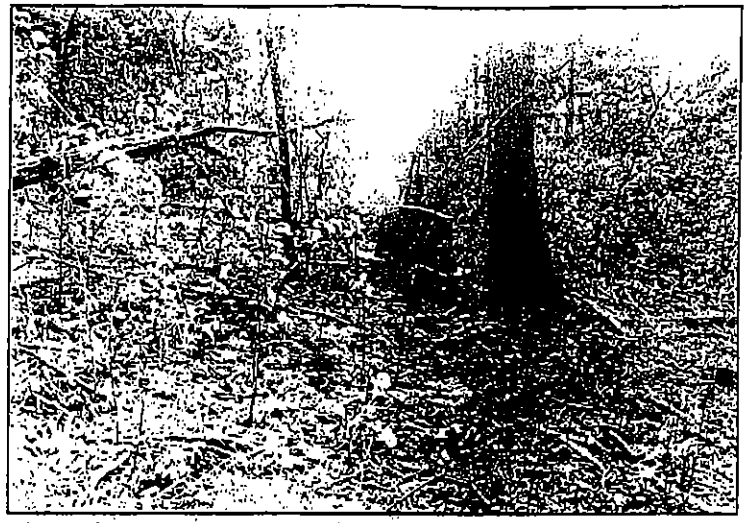
Maryland Ridge Sugar Camps

Sap continues to be visible running from a Maple tree which had been originally tapped in the 19th-century

Joseph Whaley Sugar Camp
Remains of hand hewn sandstone open fireplaces where Maple sap was boiled into Maple syrup and sugar

Remains of Sugar Camp from Thomas Breeden Farmstead similar camps are found on many farms throughout the community

Zebulon and Mary Whaley Alexander Farmstead



Grave site of Zebulon and Mary Whaley Alexander and freed black settlers who remained together after settling in Indiana

Early 19th-century log house located on Zebulon and Mary Whaley Alexander farmstead

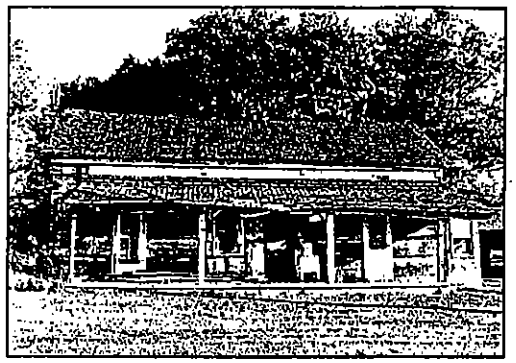
Farmstead and Community Roadbeds

County roadbed is still visible although the road was moved to accommodate an overpass bridge for the Illinois Central railroad near Solsberry

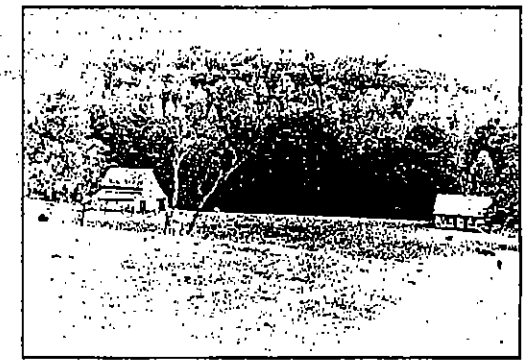
Farmstead roadbed can still be seen on William and Christiana Greaves Fowler farmstead near the site of the original house. A later carriage house and shed can still be seen on the left

Farm roadbeds are visible and still in use throughout the community. A vast network of farm roads continue to connect many farms throughout the community as between the Whaley and Fowler farms

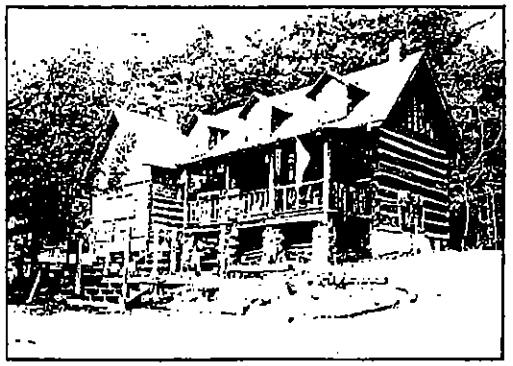
Homes of Log Construction Found Throughout Maryland Ridge



c.1830 log construction house later covered in wood siding, currently in the process of being remodeled. — Alternative views display wood siding



Located on the Marion Blair property near Blair Hollow, the farmstead continues to be produce cattle and hay



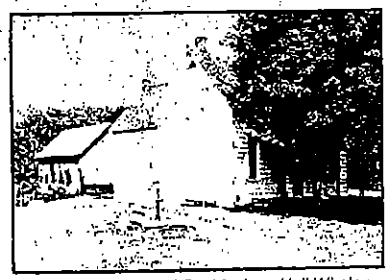
c.1830 log house, post reconstruction, and located on the Harley Breeden farmstead

Homes of Original Settlers
Constructed by the Same Group of Local Carpenters

c.1840 Paris Edwards house on old Solsberry Road

c.1840 George and Ladocia Burch Edwards house

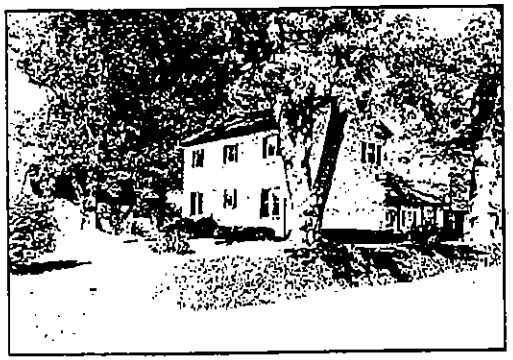
c.1840 central passage house



c.1840 Joseph and Sophia Jane Hall Whaley house

Maryland Ridge Homes

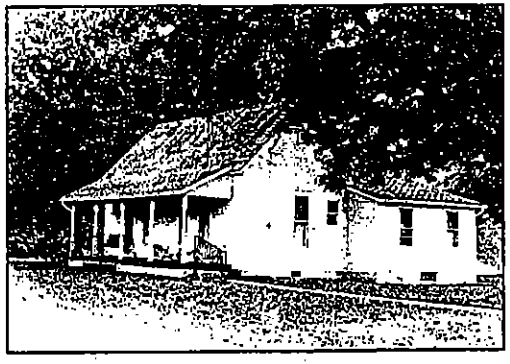
Carmichael house in Jonesboro, now called Hobbleville



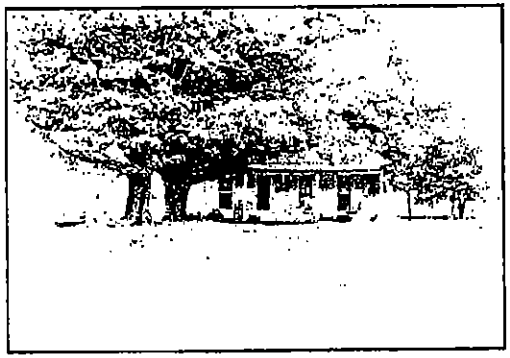
Burch house near Freeland property in Indian Creek Township

Custis house near Solsberry

19th-Century Homes



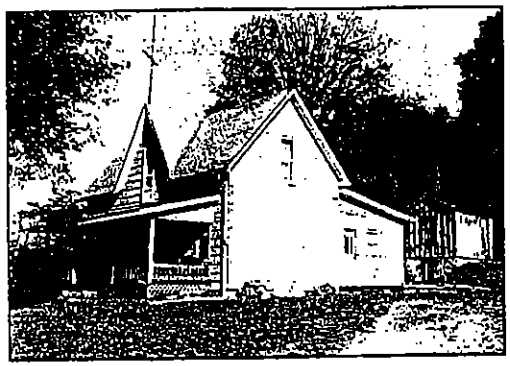
c.1870 double pen near Hendricksville



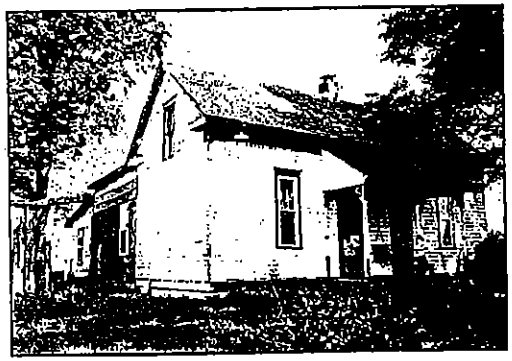
c.1860 Johnson house

Latter 19th-century Folk Victorian house

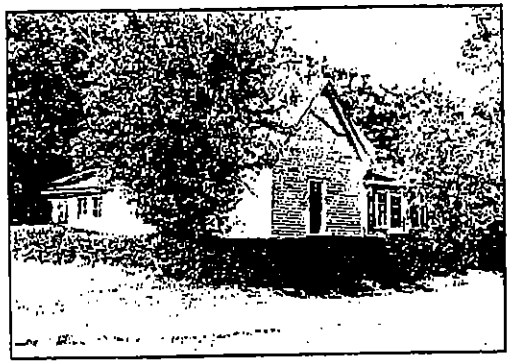
19th-Century Homes



Center-gabled double-pen house near Solsberry



c.1850 double-pen house on farmstead near Stanford



c.1870 house in Hobbleville

Later Generation Maryland Ridge Homesteads

Farmstead between Solsberry and Hobbieville

Close-up of house on farmstead between Solsberry and Hobbieville

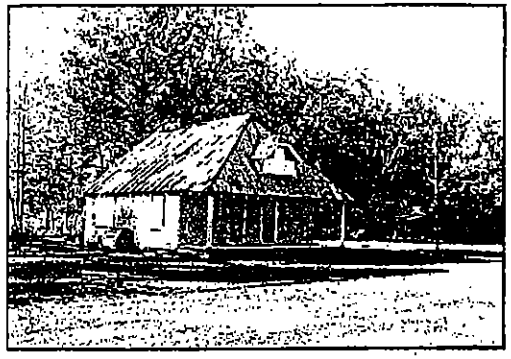
Mid 20th-century homestead near Stanford

Mid 20th-century farmstead near Hobbieville

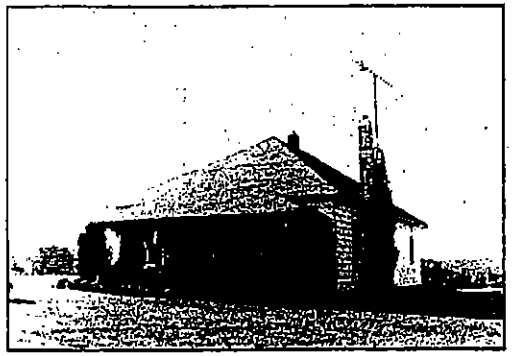
Early 20th-century farmstead between Hobbieville and Stanford

Mid 20th-century farmstead between Solsberry and Hobbieville

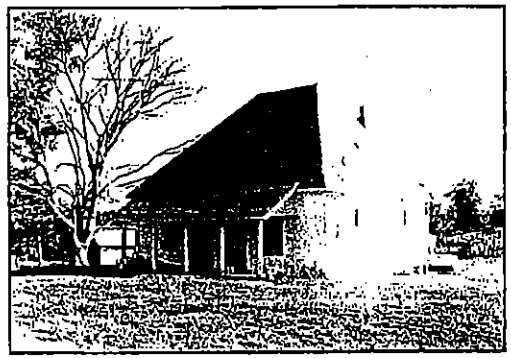
Pyramidal-Roof Homes
Typical of the Community



c.1910 double-pen Roy Sullivan home near Solsberry



1914 double-pen Frank and Vina Fowler home on William and Christiana Greaves Fowler farmstead



c1910 double-pen on Carmichael farmstead

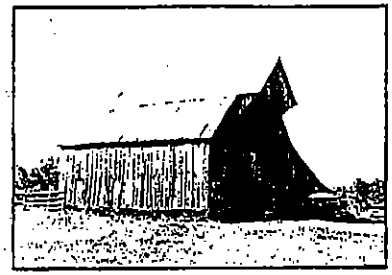
20th-Century Indiana Limestone Homes

1920 Joseph Thompson home on Daniel Rawlings farmstead owned by Maxine Whaley Barrett

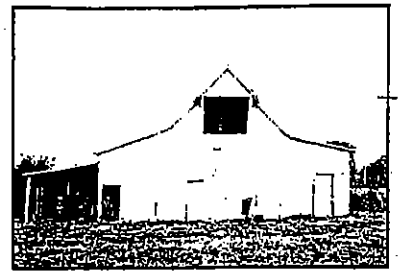
Other Indiana limestone objects designed and carved by Marshal Barrett and found throughout the Maryland Ridge community

1948 Harley and Ersie Shaffer home on Zebulon and Mary Whaley Alexander farmstead

19th and Early 20th-Century Barns



Joseph and Sophia Jane Hall Whaley farmstead Midwest three-portal barn



Frank and Vina Fowler 1920 Midwest three-portal barn on the William and Christiana Greaves Fowler farmstead

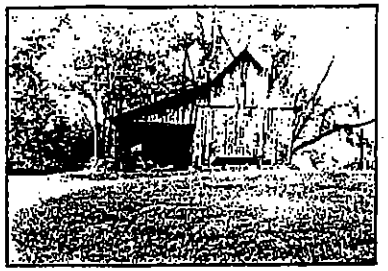
1909 barn on the Zebulon and Mary Whaley Alexander farmstead

c.1900 English barn on the Oscar and Olivia Sanborn farmstead

Midwest three-portal barn on the John Whaley farmstead

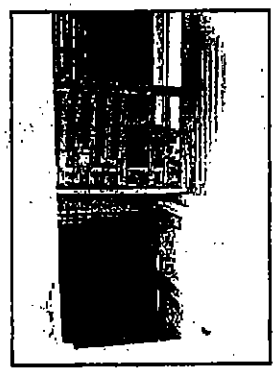
Larger Midwest three-portal barn on the John Whaley farmstead

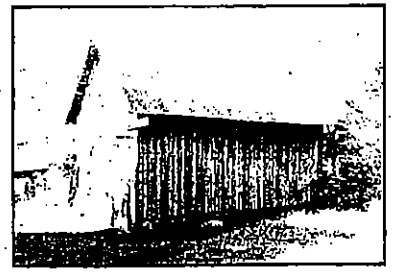
Sheds or Smoke and Wood Houses



Shed and wood house on the Edwards farmstead

Carriage house and shed on the Paris Edwards farmstead





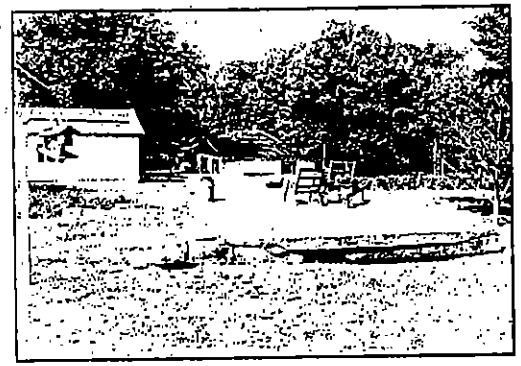
c.1850 smokehouse and cellar on the Joseph and Sophia Jane Hall Whaley farmstead with cellar entrance shown in the picture on the left. Hand-hewn sandstone block construction visible

Corn crib and grain bin on Zebulon and Mary Whaley Alexander farmstead

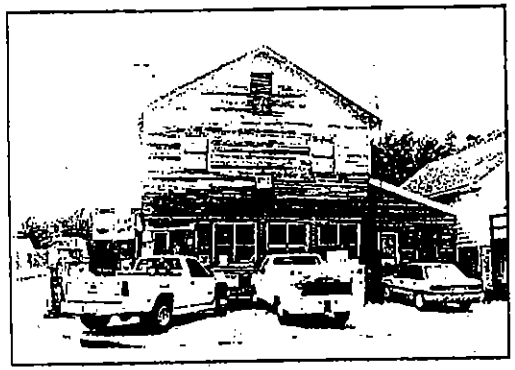
c.1940 wood house and shed near Stanford

Community Groceries

Store owned by William Fowler in Elwren. Closed after collapse of the railroad.



Cellar and foundation to small store located on the Carmichael farmstead which is typical of small businesses that have come and gone in different locations throughout the community for generations

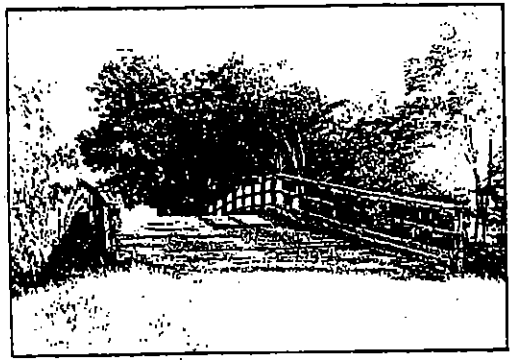


Solsberry grocery store and Masonic Lodge which continues to operate and is a cultural landmark known throughout the community

Bridges Throughout the Community

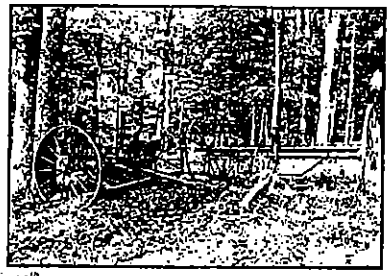
c.1920 Warren pony truss bridge near Hobbleville. This is one of only five left remaining in Greene County

1916 concrete encased steel beam bridge in Solsberry

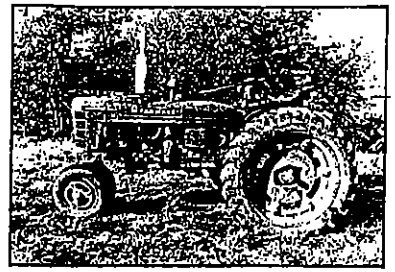


c.1940 wooden trestle over Illinois Central railroad near Solsberry

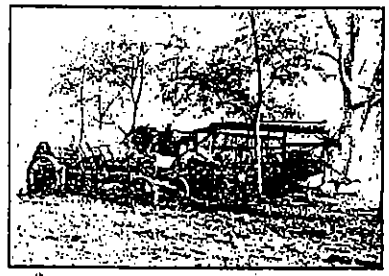
Artifacts



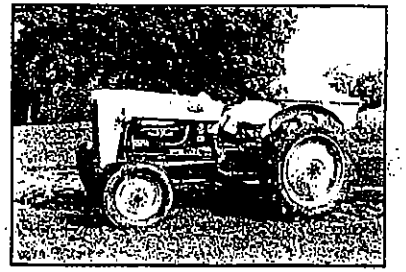
19th-century horse-drawn hay rake and seed drill



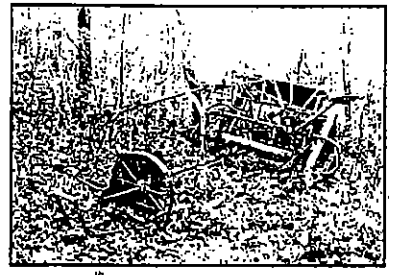
1948 International Farmall H tractor still in use



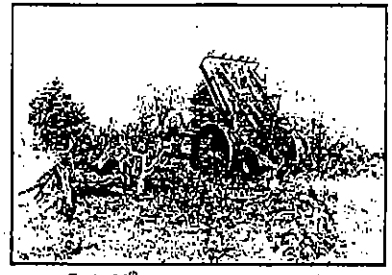
19th-century horse-drawn manure spreader and steam powered thrasher



1953.Ford tractor, Golden Jubilee edition still in use



19th-century horse-drawn binder



Early 20th-century manure spreader

312-795-3730

Mary Ann Hamilton

517 Brentwood Dr. W , Plainfield, IN 46168

October 17, 2002 07:59 PM

Michael Grovak
Bernardin, Lochmueller and Associates
6200 Vogel Road
Evansville, IN 47715

Subject: Choose I-70/US 41 Alternative for extending I-691

Dear Michael Grovak:

I strongly urge the Indiana Department of Transportation to choose Alternative 1, the I-70/US 41 route, for extending I-69 to Evansville. I-70/US 41 is the only environmentally and economically responsible choice for Indiana. Any of the other alternatives identified in INDOTs recently-released Draft Environmental Impact Statement for I-69 will waste hundreds of millions of taxpayer dollars, harm communities, especially those along US 41, and cause widespread and irreparable environmental damage.

In sharp contrast, I-70/US 41 saves hundreds of millions of dollars, enjoys overwhelming support along the route, preserves farmland, forest, and other natural areas, and leaves money available for other important transportation projects across the state.

INDOT should focus on establishing a connection between Indianapolis and Evansville in the most environmentally and fiscally responsible manner possible. For example, Kentucky's first two purposes for its I-69 planning process are 1) maximizing the use of Kentucky's existing parkway system; and 2) minimizing environmental impacts. INDOT should follow the same common sense approach. Therefore, please make the right choice for Indiana's environment, communities, and fiscal health by choosing the Common Sense I-70/US 41 route for I-69. 2.2.2

Sincerely,

Mary Ann Hamilton

cc:
Governor Frank O'Bannon

1017-018

STRATEGIC TRAINING SYSTEMS, INC.
Communications Training & Instructional Design

3600 Ramp Creek Road • Bloomington, Indiana 47401
E-mail: sts@kiva.net Phone/Fax 812.824.6963

October 29, 2002

Michael Grovak
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, IN 47715

Dear Mr. Grovak,

I am a businessman who operates a consulting firm in Bloomington, Indiana. My work takes me north and south on Route 37 and I-69 many days of the week. I have traveled these roads for years, so naturally, I have followed the progress of the I-69 studies and media coverage with interest, and of late, great concern.

I am adamantly opposed to the selection of an I-69 extension that runs through either Monroe County or Owen County, given all the new highway construction that would be needed under these circumstances.

Considering the current state of Indiana's economy and all the cutbacks in services that are now in place, I find it unconscionable that the I-70/Route 41 alternative has already been eliminated. This common sense choice would help Terre Haute economically and save millions of dollars in Indiana funds that can only come from the Transportation Equity Act for the 21st Century.

The I-70 and U.S. 41 alternative is the best choice for the state's budget, our economy, and yes, our environment. It will save hundreds of millions of taxpayer dollars and cause the least disruption to businesses, homeowners, and farming interests. It is my understanding that a majority of people who live and work along the Route 41 corridor support this common sense route that will still provide the needed upgrade our state needs for a north-south interstate highway system.

Interestingly, the governor of Kentucky and his legislature have already decided to use existing roads for their I-69 upgrade. Why not Indiana? 2.3.2

1029-042

There are thousands of people in this wonderful state who will no longer have our voices disregarded at the cost of special interests, millions of taxpayer dollars and the unnecessary loss of thousands of acres to save a mere 13 minutes of travel time. While there is still time to consider the final decision before it is made public, I urge you and the current administration in Indianapolis to do so.

Respectfully,

Samuel Kazdan

Samuel I. Kazdan Ph.D
President

smart mobility

Review of I-69 Evansville to Indianapolis Tier 1 Draft Environmental Impact Statement

November 2002

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1.0 Introduction

Suppose someone offered you $100.27 in the year 2025 and someone else offered you $100.09. The $100 sounds good, although it's a long time to wait. How much would you care about an extra 18 cents 22 years from now? Not much. The authors of the I-69 Draft Environmental Impact Statement ("DEIS") want you to care a lot. They want you to ignore the $100 and focus on the difference between 27 cents and 9 cents.

These numbers, $100.27 and $100.09, are proportional to the range in total regional employment between the highest and lowest scoring I-69 route alternatives in the DEIS. In the No-Build case, regional employment is forecast to be 1.6 million in 2025. The highest increase from any new terrain alternative is 4,300. On a base of 1.6 million, this is an increase of only 0.27 percent, or as illustrated above, equivalent to 27 cents on $100. The I-70/US 41 alternative is forecast to increase employment by 1,400, or 0.09 percent. The DEIS labels the 27 cent impact as "High" and the 9 cent impact as "Low" (Table 3-35, p. 3-54). 3.4.4

In reality, all of the impacts on regional employment are exceedingly low. The DEIS attempts to make them look more significant by not providing any base for comparison. It asks you to focus on the difference between 27 cents and 9 cents, while not even telling you about the $100.

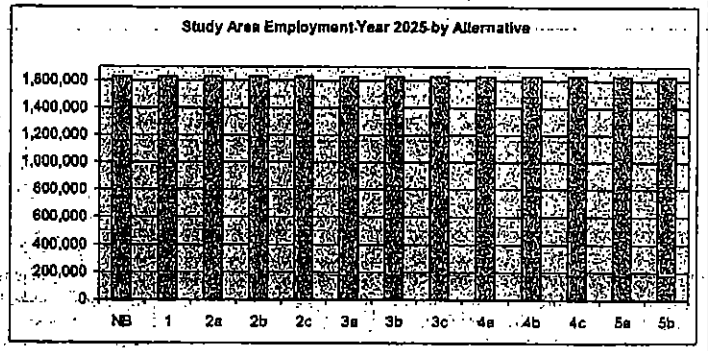
This sleight-of-hand is demonstrated by the graphics on the next page.

The top graphic shows how many people the DEIS projects will be employed in Southwest Indiana if no I-69 highway is built ("NB," or No-Build), if the I-70/US 41 route is used (Alternative "1"), and if one of the other routes is built (Alternatives 2A-5B). As can be seen, the differences between the alternatives are imperceptible – as one would expect given that the biggest increase with any of the alternatives is about one-quarter of one percent.

The bottom graphic is from the DEIS. It shows the same data, but with the "base" employment (the $100, in the example above) excluded. Presented this way, without any context, a difference of one-quarter of one percent is made to look far more significant than it actually is.

How to Lie with Statistics, by Darrell Huff and illustrated by Irving Geis, was published in 1954 and has sold over half a million copies. The type of distortion used in the DEIS is described in Chapter 5, "The Gee-Whiz Graphic." *How to Lie with Statistics* shows a graph like the top graph on the next page showing the entire range from 0 to a maximum value on the left-hand scale. Huff writes: 3.4.4

> [B]ecause the whole graph is in proportion and there is a zero line at the bottom for comparison[,] [y]our ten per cent looks like ten per cent – an upward trend that is substantial but perhaps not overwhelming.
>
> That is very well if all you want to do is convey information. But suppose you wish to win an argument, shock a reader, move him into action, sell him something, this chart lacks schmaltz. Chop off the bottom.
>
> ... Nothing has been falsified – except for the impression that it gives.[1]



3.4.4

Figure 1: Rescaled Version of Figure 3-20: Increase in Study Area Employment (Year 2025), p. 3-46, I-69 DEIS, rescaled by Smart Mobility Inc.

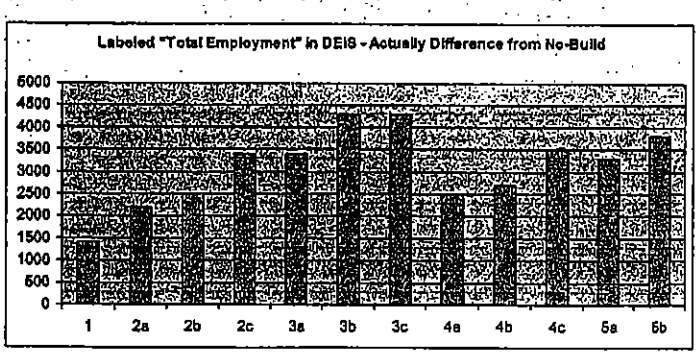


Figure 2: Reproduced from data in Figure 3-20: Increase in Study Area Employment (Year 2025), p. 3-46, I-69 DEIS

[1] Huff, Darrell, *How to Lie with Statistics*, p. 61-62. New York: W.W. Norton, 1954.

The regional employment graphic is not an isolated example. This is the general approach that the DEIS uses, over and over again. Another example is "Daily Truck Hours Saved (Year 2025)" (Figure 3-25, p. 3-51). In the DEIS's graphic, the highest increase – 4500 – looks big. What most readers have no way of knowing is that it comes on top of a base of over 1.1 million. Therefore, the increase is actually only 0.4 percent, equivalent to only 40 cents on $100. The difference between I-70/US 41 and the highest performing alternative is only 0.2 percent. These are tiny increases. Yet on these and numerous other measures, the DEIS uses graphics with the bottom "chopped off" to make tiny improvements look like significant ones. 3.4.5

The DEIS's presentation is deceptive in other ways as well. For example:

- It biases results against I-70/US 41 by including improvements along I-70/US 41, but not similar improvements along alternative routes, in the No-Build scenario. This depresses I-70/US 41's scores on numerous performance measures, and inflates the scores of Indiana DOT's "preferred" routes. 2.3
- It makes much of time savings that I-69 would produce for travel between Evansville and Indianapolis, but fails to mention that extremely few travelers would benefit from them. Important data showing total time savings (travel-time savings multiplied by the number of travelers) for Evansville-Indianapolis travel are, not surprisingly, not presented. 3.4.3
- It fails to present data for the standard, important performance measures of total vehicle-hours traveled ("VHT") and vehicle-miles traveled ("VMT"), on which the I-69 alternatives perform poorly. 3.4.3

As we discuss in Section 2 below, when the data are presented fairly and neutrally it is clear that none of the I-69 alternatives produces any significant benefits with respect to the DEIS's stated purposes for this project. The DEIS's misleading presentation of data obscures this fact. It artificially inflates the new-terrain alternatives' negligible improvements in performance over the No-Build and I-70/US 41 -- or, in some cases, their lack of any improvement -- into something designed to appear significant. 3.4.4

As discussed in Section 3, these negligible improvements come at a very high cost to taxpayers. The DEIS obscures this fact, too. It spends almost no time discussing costs. It also fails to include graphics showing the enormous cost differences between the alternatives. The DEIS's "preferred" alternatives cost up to nearly twice as much as I-70/US 41 to construct, and up to ten times more to operate and maintain each year. These differences, when presented graphically, as below and in Section 3, are dramatic. 3.4.6

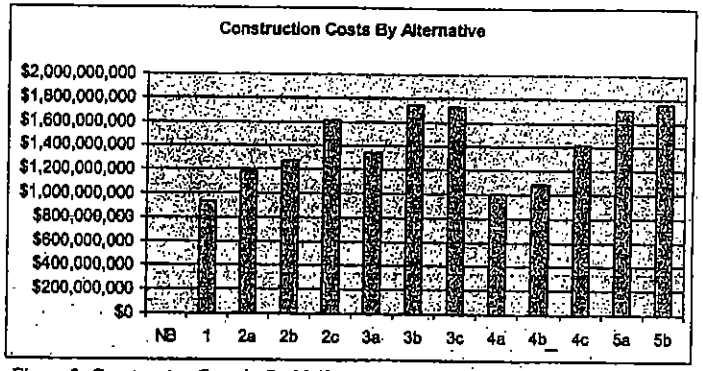


Figure 3: Construction Costs by Build Alternative, Smart Mobility, Inc.; Based on data from Table 3-33: Capital Cost and Mileage Estimates of Alternatives Carried Forward for Detailed Study, p. 3-52, I-69 DEIS

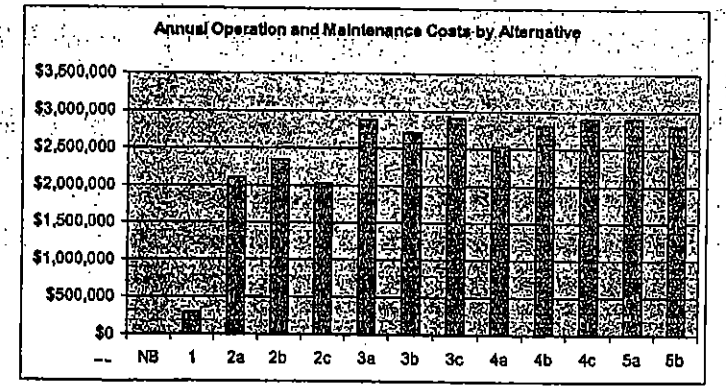


Figure 4: Annual Operation and Maintenance Costs by Build Alternative, Smart Mobility, Inc.; Based on data from Table 3-34: Annual O&M Cost Increases, Alternatives Carried Forward for Detailed Study, p. 3-53, I-69 DEIS

A final major failing of the DEIS is its failure to include a comprehensive cost-benefit analysis. Minimizing cost to Indiana and U.S. taxpayers is apparently not a goal of the I-69 project, but it should be. The benefits are small. The costs are undeniably large. We conclude in Section 3 that, given the information currently available, none of the I-69 | 3.4.1

alternatives have benefits significant enough to justify the large investment required to complete and maintain them. However, if one were to select the best I-69 alternative, it would be I-70/US 41 because it costs the h. | 3.4.1

The DEIS consistently presents its data in misleading ways. As *How to Lie with Statistics* says, this is common practice when someone is trying to close a sale. *Caveat emptor*. Let the buyer beware!

2.0 Project Performance Relative to Purpose and Need

The DEIS identifies nine elements of Project Purpose and Need (p. S-2). These elements are discussed in Sections 2.3 – 2.11 of this report. In general, the data presented in the DEIS show very minor benefits and high costs for new terrain alternatives, and do not make a strong case for any new expressway. For the most part and except where specifically mentioned, we assume for purposes of argument that the DEIS data are valid. However, we do not necessarily agree with or accept the validity of all of these data.

Sections 2.1 and 2.2 below describe two general deficiencies in the DEIS which affect all of the project performance results. Section 2.1 demonstrates how the definition of the No-Build alternative has biased the DEIS against an I-70/US 41 alignment. Section 2.2 describes how errors in the model data files have caused inconsistent accounting of performance measures.

2.1 The No-Build alternative is inconsistent and biased against the I-70/US 41 alignment

By including in the No-Build Scenario planned improvements along the Alternative 1 route, but not other improvements along several of the "preferred" routes, the DEIS biases its results against the I-70/US 41 alignment and in favor of other routes.

All of the performance measures used to evaluate the alternatives in the DEIS are calculated relative to a "No-Build" scenario. In this context, "No-Build" does not actually mean that nothing is built between now and 2025. In fact, the No-Build scenario includes major construction projects, especially along the Alternative 1 route.

The DEIS states:

> The needs analysis is conducted with reference to the "No-Build" condition of existing and committed projects (e+c network). "Committed" projects are those which are anticipated by INDOT to be built in the near future or for which INDOT has a firm, long-term policy to build. Committed projects in the Study Area include:

- Added travel lanes on I-70
- Upgrade of US 231 near Jasper and Huntingburg, continuing south to the Ohio River
- Upgrade of US 50 east of Washington
- Upgrades of SR 62 and 66 in Warrick County
- Construction of SR 641 (Terre Haute bypass) in Vigo County
- Upgrade of US 41 in Vanderburgh County
- Upgrade of SR 37 in Orange County
- Upgrade of SR 46 in Monroe County[2]

The I-70 widening projects cover the entire distance of the I-70 portion of Alternative 1. The Terre Haute bypass (SR 641) is also part of Alternative 1. The Indiana DOT's *Long Range Plan* lists both the Indianapolis portion of I-70 widening and the Terre Haute bypass as programmed for 2004. Inclusion of these projects in the No-Build scenario appears justified. However, most (42 miles out of 48 miles) of the I-70 widening is shown in the *Long Range Plan* as scheduled for 2022 and 2024.[3] Dates twenty years in the future do not meet the criteria "to be built in the near future." And it strains credulity to characterize projects listed for such a distant date as ones that Indiana DOT "has a firm, long-term policy to build." Projects this far off are, almost by definition, very uncertain. 2.3

Moreover, the DEIS is inconsistent in determining which planned improvements to include in the No-Build scenario. Indiana DOT's *Long Range Plan* also includes the widening of a 10-mile stretch of State Road 37 south of I-465, which Alternatives 2C, 3B, 3C, 4C and 5B generally follow. This improvement is planned for 2014, a decade earlier than the I-70 widening. But the DEIS does not include it in the No-Build scenario. 2.3

Including the entire I-70 widening in the No-Build scenario results in understating the benefits of Alternative 1. Widening I-70 will provide significant travel benefits, such as decreased travel times and reduced congestion. However, much of that benefit is already included in the No-Build scenario, and it therefore does not show up in the tables as a benefit of Alternative 1 (or of other alternatives that incorporate shorter parts of I-70). 2.3

Omitting the SR 37 project from the No-Build scenario results in the opposite effect. By including the I-70 widening in the No-Build, the DEIS underestimates the benefits of alternatives— primarily Alternative 1 – that use the I-70 corridor. By excluding the SR 37 widening, the DEIS overestimates the benefits of alternatives – 2C, 3B, 3C, 4C and 5B – that generally follow SR 37 into Indianapolis. For instance, the extent to which these alternatives reduce congestion and improve travel times on SR 37 will be overstated. 2.3

[2] DEIS, pp. 2-9 – 2-10.
[3] Indiana Department of Transportation, 2000-2025 *Long Range Plan*, http://www.in.gov/dot/pubs/longrange/index.html.

This inconsistency biases the DEIS results against the I-70/US 41 alternative in favor of new terrain routes. As discussed below, even with this bias, the DEIS fails to demonstrate significant benefits of the new terrain routes. Nevertheless, it is important to keep in mind that the benefits of these routes would be even smaller if this bias were not present.

2.2 Apparent error in calculation of "Study Area" measures

The computer travel model used to calculate the performance scores of the alternatives appears to contain an error which casts strong doubt on the reliability of the results that the DEIS reports on ten different performance measures.

The DEIS calculates many of the performance measures for the "Study Area," which is shown below.

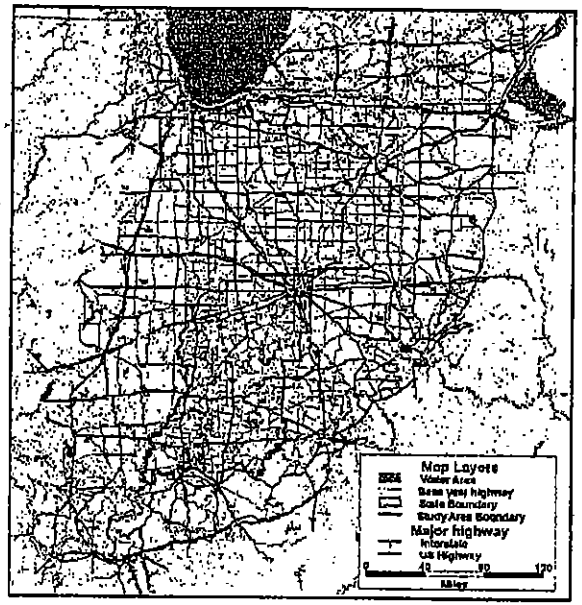


Figure 5: Reproduced from Figure 1, Geographic Coverage of Updated I-69 Indiana Statewide Travel Model, Model Development and Validation Technical Report 3.3.3, p. 4

In our review of the DEIS, we obtained and used some of the DEIS authors' travel model computer files. For each alternative scenario, the model files include a variable for each roadway link, reflecting whether the link is inside the Study Area or outside. We have used this variable in calculating Study Area performance measures, and we assume that INDOT's consultants have done likewise.

If so, the DEIS's calculations of the alternatives' performance on numerous measures contain errors, because the Study Area is defined inconsistently in the model files. The Study Area for Alternative 1 appears to be correct, but the Study Area for all other alternatives, including No-Build, has spurious links added to it. These links are shown in red in Figure 6 below.

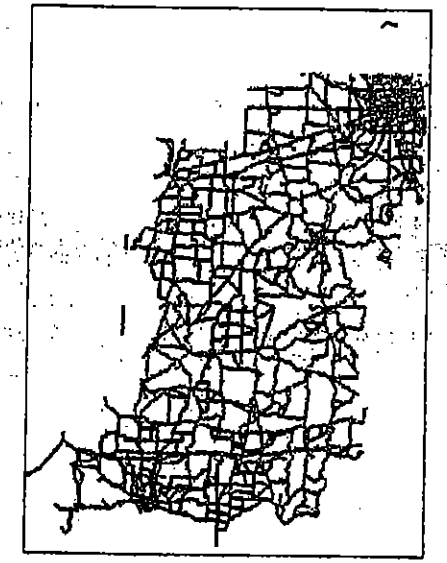


Figure 6: Red links spuriously in Study Area for all alternatives except Alternative 1: Produced by Smart Mobility, Inc. based on model files provided by INDOT's consultants

3.4.3

The addition of these spurious links may have affected the alternatives analysis results measurably. If our suspicions are confirmed and Indiana DOT's consultants have indeed relied on an incorrectly defined Study Area, then all of the performance measures that are reported for the Study Area need to be recalculated. These include:

1) Percentage of Vehicle Miles of Travel (VMT) on Major Highways in Study Area

2) Percentages of Vehicle Hours of Travel (VHT) on Major Highways in Study Area
3) Average Scaled Percentages of VMT and VHT on Major Highways in Study Area
4) Average Scaled Scores, All Personal Accessibility Measures
5) Volume to Capacity (v/c) Ratio on Major Highways in Study Area, Weighted by VMT
6) Percentage of Congested Roadway Lane Miles in Study Area
7) Percentage of Congested VMT in Study Area
8) Percentage of Congested VHT in Study Area
9) Percentage of VHT Operated in Delayed Conditions in Study Area
10) Efficient System Performance Index by VHT for Study Area.[4]

2.3 Improve the transportation linkage between Evansville and Indianapolis

The DEIS leaps from the undisputed fact that there is no straight-line expressway between Evansville and Indianapolis to the conclusion that there is a "need" for such a road. There is no basis for this leap. Demonstrating that a drive from Evansville to Indianapolis on existing roads takes longer using existing roads than it would on a straight-line expressway does not establish a "need" for such an expressway. Transportation projects should be justified based on total time savings that they generate, for all travelers. Figures developed in the DEIS study show that I-69 would generate very small total time savings for travelers between Evansville and Indianapolis, because very few people drive between these two cities.

2.3.1

The DEIS correctly demonstrates that there currently is no straight-line expressway route between Evansville and Indianapolis (pp. 2-11 – 2-12). It then restates this fact with respect to hypothetical straight-line travel between the two cities at "Interstate travel times" (pp. 2-12 – 2-13).

The lack of such a "straight-line" expressway is an undisputed fact. However, it does not constitute a "need." Interstate highways are not always straight. In fact, if we apply the same measure used in the DEIS to the existing I-69, which runs between Indianapolis and Port Huron, the existing I-69 is less straight than an I-69 along I-70 and US 41 would be between Indianapolis and Evansville.[5]

If there is a "need" for a straight-line highway between Evansville and Indianapolis, the best way to address it would be to construct a new Interstate between them – the straighter, the better. Thus this supposed "need" is really just a restatement of the desire to pursue a particular class of alternative: a straight-line highway. As this "need" is listed

[4] DEIS, Appendix A, p. A-20.
[5] The straight line distance between Indianapolis and Port Huron is 290 miles. The distance along I-69 is 366 miles. The ratio of the distances is 0.79, which is less than the ratio of 0.81 reported for Alternative 1 in the DEIS (Table 2.1, p. 2-12).

first and labeled as one of only three "core goals," it serves as a warning that the entire project may be predicated on a pre-existing goal of building a new "straight-shot" highway.

The transportation performance measures developed for this "need" – reductions in free-flow travel time and congested travel time between Indianapolis and Evansville (p. 2-38) – mirror the problem statement by giving the highest scores to alternatives that connect Evansville and Indianapolis in what most closely resembles a straight line. These are not appropriate performance standards to plan a major transportation project. Under generally accepted transportation planning principles, performance should be measured by total time savings, i.e. travel time savings multiplied by the number of travelers, rather than by travel time savings alone. This is because a shorter travel time is of little benefit, to taxpayers and to society generally, if few people are making the trip.

After reviewing the travel demand model files provided by INDOT's consultants, we have found that Indianapolis is simply not a major destination for Evansville residents, and vice-versa. Nor would they become major destinations if I-69 is extended. INDOT's consultants' figures project that in the No-Build scenario there will be only 251 daily round trips between Evansville and Indianapolis in 2025.[6] The total number of round trips to and from Evansville projected in the No-Build is 571,728. Thus, trips between Evansville and Indianapolis account for only about four one-hundredths of one percent (0.04%) of all Evansville trips, and an even smaller percentage of Indianapolis trips. If Alternative 3B (the alternative with the fastest travel time) is built, providing the more-or-less straight-line connection between Evansville and Indianapolis that the DEIS suggests is "needed," the number of daily round trips between Evansville and Indianapolis increases by only 104, to 355. This is only 0.06% of total Evansville trips in the Alternative 3B scenario, and again an even smaller percentage of Indianapolis trips. 2.3.1

Trips between Evansville and Indianapolis therefore represent only a tiny portion of total travel in the Study Area. Vehicles traveling between Evansville and Indianapolis also represent only a very small percentage of the expected traffic on the new I-69. The graphic below shows that Evansville to Indianapolis traffic is forecast to be only 0.5 percent of the average daily traffic on I-69 Alternative 3B. Results for other alternatives would be similar. The great majority of traffic on the new I-69 is forecast to be made up of vehicles traveling shorter distances. 3.4.3

[6] Numbers in this section were extracted from the travel demand model using a 20 mile radius around the city centers to define "Evansville" and "Indianapolis."

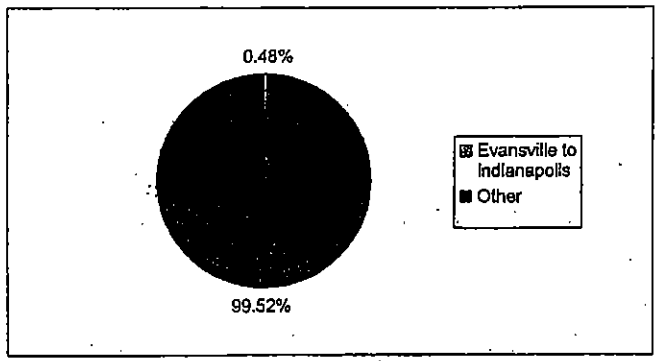


Figure 7: Evansville to Indianapolis trip as portion of total forecast new I-69 traffic for Alternative 3B: Data extracted by Smart Mobility, Inc. from model files provided by INDOT's consultants

As discussed above, total time savings, for all travelers, is what is important in planning and evaluating a major transportation project. With respect to travel between Evansville and Indianapolis, the number of travelers is so low that total time savings will be very small. Although the DEIS does not quantify the savings, they are clearly not sufficient to justify a major transportation expenditure like I-69. 3.4.3

Because the time-savings issue is not limited to travelers just between Evansville and Indianapolis, we will address it for the entire Study Area in Section 2.4 below.

2.4 Improve personal accessibility for Southwest Indiana residents

Another of the three "core" project goals is improving personal accessibility in Southwest Indiana. But the DEIS, while it includes graphics showing that personal accessibility in the region is low, omits data showing that none of the I-69 alternatives will improve personal accessibility in the region to any significant degree.

In the Purpose and Need chapter, the need for greater personal accessibility is expressed by a series of graphics showing that southwestern Indiana has less accessibility to desirable destinations than the rest of the state (pp. 2-16 – 2-19). For example, Figure 2-13 is reproduced below.

Figure 2-13: Indiana Accessibility to Employment

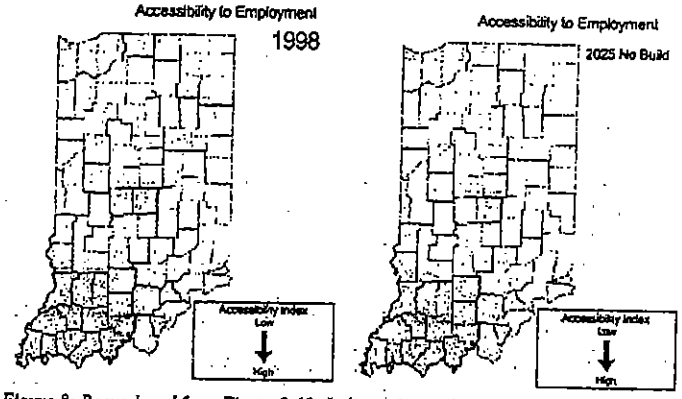


Figure 8: Reproduced from Figure 2-13: Indiana Accessibility to Employment (2025 No-Build), p. 2-17, I-69 DEIS

In these graphics, "accessibility" is calculated using a "gravity" model. Being closer in time increases the accessibility score, but so will being larger in population. These graphics show southwestern Indiana having low accessibility primarily because it has a low average population density and because it is distant from the more densely populated Indianapolis and greater Chicago regions.

Construction of a new roadway can be expected to have very little impact on these low accessibility ratings. With or without a new highway, southwestern Indiana will still have low population density and be distant from Indianapolis and the greater Chicago region. Notably, and no doubt for this reason, the DEIS's analysis of the alternatives fails to include similar graphics showing what regional accessibility would look like if each of the I-69 alternatives were built. Moreover, INDOT denied the Environmental Law and Policy Center's formal request, under the Indiana Public Access to Records Act, for this accessibility data for each of the alternatives. 2.3.1

Thus, the DEIS claims that the Study Area's low accessibility ratings create a need for a new I-69 highway, but it omits graphics that can be expected to show that I-69 will not measurably improve those ratings. Fortunately, however, we have obtained some of this missing data. Apparently through the inadvertence of INDOT or its consultants, the set of CD-ROMS that they transmitted in response to our request for information includes accessibility data in unreferenced files. 3.4.3

While there is no way to know whether these accessibility data are the final numbers, they appear to confirm that none of the I-69 alternatives will significantly change the accessibility graphics used as the basis for Purpose and Need. Below, we show the accessibility to employment graphic for Alternative F-2, which the DEIS identifies as having the greatest benefits in employment accessibility (p. A-8), compared with data from the same computer file for the 2025 No-Build scenario. There are very minor differences between the two graphics, but the pattern is virtually identical. 3.4.3

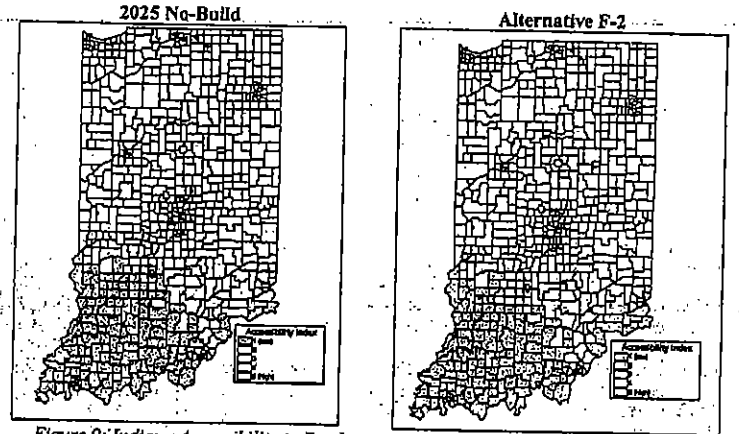


Figure 9: Indiana Accessibility to Employment – 2025 No-Build vs. Alternative F-2; Graphed by Smart Mobility Inc using data supplied by Indiana DOT.

Graphics for the other alternatives would, similarly, look virtually identical to the No-Build.

The DEIS lists eight performance measures for personal accessibility (p. 2-38). Three – accessibility to population, accessibility to employment and population-weighted accessibility to employment – are of the type described above, which measure accessibility to all possible destinations. The others are vehicle-miles traveled (VMT), vehicle-hours traveled (VHT) and three travel time-based measures, all of which involve counting the population living within a certain travel time of some set of destinations.

Appendix A includes exact scores for the first three measures: population accessibility, employment accessibility, and population-weighted accessibility (App. A, pp. A-7 – A-9). Although the DEIS ranks the scores in order, looking at the raw model outputs is most 3.4.3

instructive. As shown in the graphics below, the values are essentially identical across alternatives, varying by less than 1 percent across all alternatives, including No-Build.[7] 3.4.3

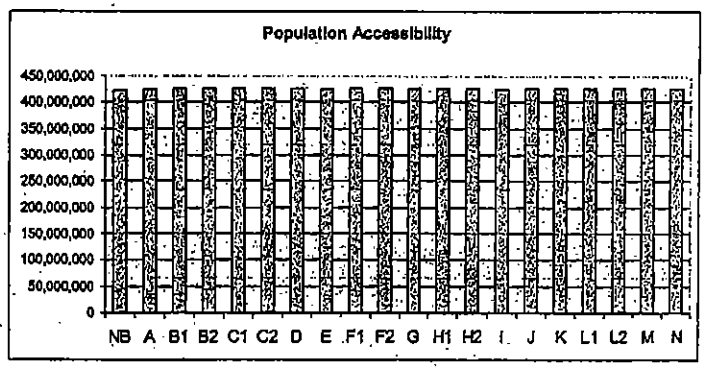


Figure 10: Rescaled Version of Figure A-5: Population Accessibility Scores, p. A-7, I-69 DEIS Appendix, Smart Mobility, Inc.

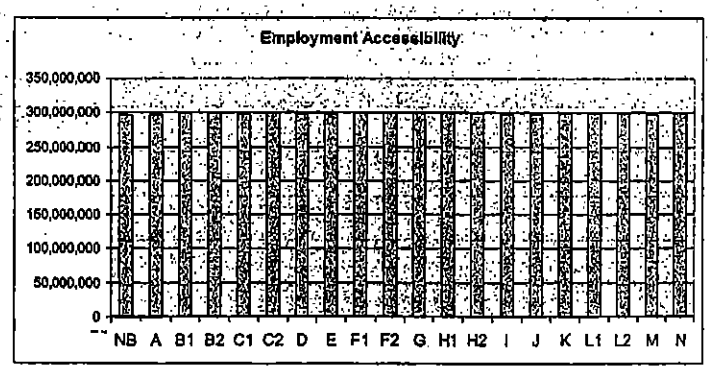


Figure 11: Rescaled Version of Figure A-6: Employment Accessibility Scores, p. A-8, I-69 DEIS Appendix, Smart Mobility, Inc.

[7] Appendix A includes numbers for the Route Concepts described in Chapter 3 of the DEIS. The DEIS does not provide similar numbers for the refined (Level 3) alternatives. However, the refined alternatives are very similar to the earlier Route Concepts, and the differences between them would not noticeably affect these population accessibility calculations.

The DEIS lists VHT and VMT as accessibility performance measures, but it relegates the results for these measures to an Appendix, and then only presents them in a convoluted way. Instead of providing data for total VHT and VMT, the DEIS provides data only for the percentage of VHT and VMT on "interstate highways and principal arterial roads." These metrics are not important in and of themselves. They are only important to the extent that they represent savings in travel time (which is measured by total VHT) or safety (which is addressed in Section 2.5) 3.4.3

Although the DEIS neglects to report total VHT and VMT for the alternatives, we have extracted these values from the travel demand model files. We begin with VHT.

Alternative	Statewide VHT	Change from No-Build	Study Area VHT	Change from No-Build
No-Build	3,416,290	-	1,434,278	
1	3,419,704	0.10%	1,430,796	-0.24%
2A	3,428,914	0.37%	1,446,987	0.89%
2B	3,430,362	0.41%	1,448,020	0.96%
2C	3,415,585	-0.02%	1,436,242	0.14%
3A	3,423,173	0.20%	1,445,717	0.80%
3B	3,408,216	-0.24%	1,430,460	-0.27%
3C	3,413,119	-0.09%	1,436,895	0.18%
4A	3,419,572	0.10%	1,438,919	0.32%
4B	3,424,336	0.24%	1,443,193	0.62%
4C	3,411,252	-0.15%	1,432,932	-0.09%
5A	3,420,051	0.11%	1,444,930	0.74%
5B	3,411,356	-0.14%	1,436,154	0.13%

Table 1: Vehicle-Hours Traveled (VHT) for Indiana and the Study Area by Build Alternative, Extracted from DEIS Model Files by Smart Mobility, Inc.

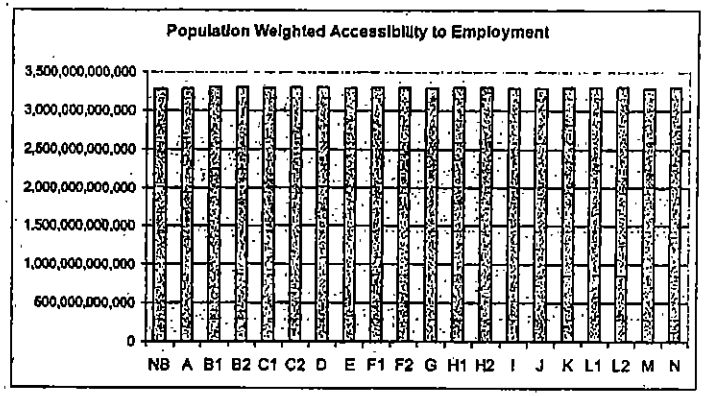


Figure 12: Rescaled Version of Figure A-7: Population-Weighted Accessibility to Employment Scores, p. A-9, I-69 DEIS Appendix, Smart Mobility, Inc.

Instead of presenting the more meaningful VHT and VMT results, which we discuss below, Tables S-6 (p. S-24), 3-5 (p. 3-31) and 6-1 (p. 6-1) instead include five different measures of the increase in population within a given number of hours of certain destinations. For example, one of the measures is the increase in population within three hours of Indianapolis. The highest number is 232,000, for Alternative 3B. This looks like a large number until it is put in perspective. The No-Build number is 15,470,342 (Table A9, App. A p. A-11). Therefore, the highest increase (Alternative 3B) is only 1.5 percent. 3.4.3

Trips of three hours are a very small percentage of total daily travel. Yet the DEIS counts as a benefit moving a small percentage of people across the line from slightly greater than three hours away from Indianapolis to slightly less. The DEIS fails to explain why any of these measures add any information to the objective benefits measured by savings in travel time (vehicle-hours traveled, or "VHT") and/or travel distance (vehicle-miles traveled, or "VMT").

In contrast to the other personal accessibility performance measures in the DEIS, time savings (VHT) are of real economic benefit and can be easily extracted from the transportation model. Similarly, VMT reductions will translate into operating cost savings. In general, lower VHT and VMT are better. Lower VHT means people have more time out of their cars to do more things. The primary goal of lessening congestion is to lower VHT and let people get out of their cars. Lower VMT means lower operating costs from less gasoline consumption, and more money to spend on other items. Most money spent on gasoline in southwestern Indiana leaves the region to pay for distant oil drilling, refining, and so forth. In contrast, more of the money spent on most other items will stay in the region. 3.4.3

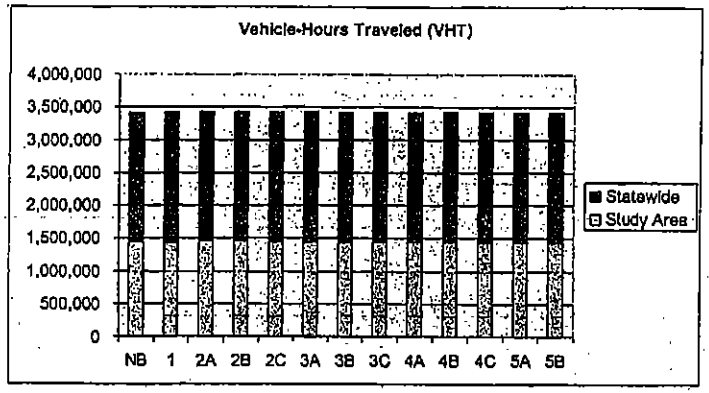


Figure 13: Vehicle-Hours Traveled (VHT) in the Study Area and Statewide by Build Alternative, Smart Mobility, Inc.

As discussed above, if VHT is higher for an alternative, people end up spending more time in cars, not less. If VHT is only slightly reduced, the project has minimal benefit. As shown by the table and chart above, statewide VHT decreases in only five of the twelve I-69 alternatives, and the reductions are slight – less than one-quarter of one percent. VHT in the Study Area is reduced in only three of the alternatives – 1, 3B, and 4C. Again the reductions are marginal, representing less than 0.3 percent of the total regional travel time. In a majority of the build alternatives, the number of hours people spend in their cars actually increases.

In many proposed roadway projects, reduction in VHT is the single most important performance measure. For I-69, this data showing minimal change in VHT seriously undermines the entire need for the project. Since so few people are traveling between Evansville and Indianapolis, any time savings for these people from a straighter route is minimal. For many of the alternatives, these time savings are more than balanced by longer trips made by others that are induced by the new roadway. Given that the primary potential benefit of a straight-line route would be reduced travel time, the new terrain alternatives are not successful. 3.4.3

Alternative	Statewide VMT	Change from No-Build	Study Area VMT	Change from No-Build
No-Build	156,079,640	-	48,972,183	
1	157,002,857	0.59%	49,504,709	1.09%
2A	157,140,804	0.68%	50,013,522	2.13%
2B	157,182,839	0.71%	50,025,518	2.15%
2C	157,465,133	0.89%	50,501,128	3.12%
3A	157,175,261	0.70%	50,311,368	2.73%
3B	157,336,476	0.81%	50,494,422	3.11%
3C	157,372,266	0.83%	50,588,875	3.30%
4A	156,878,580	0.51%	49,843,859	1.78%
4B	157,005,727	0.59%	49,944,088	1.98%
4C	157,253,651	0.75%	50,362,406	2.84%
5A	157,339,772	0.81%	50,623,591	3.37%
5B	157,424,899	0.86%	50,711,553	3.55%

Table 2: Vehicle-Miles Traveled (VMT) For Indiana and the Study Area by Build Alternative, Extracted from DEIS Model Files by Smart Mobility, Inc.

We now discuss VMT. The table immediately above shows that statewide VMT increases for each alternative by between ½ percent and 1 percent over the No-Build. VMT in the Study Area increases by 1 to 4 percent depending on the alternative. The percentage growth in VMT is greater than the percentage growth in population, so people drive more with the alternatives. Any distance savings from a straighter route between Evansville and Indianapolis is more than balanced by other travelers making longer trips than before. 3.4.3

Greater VMT means higher out-of-pocket costs for drivers. The DEIS confirms this, by estimating that business and household operating costs will be higher with any of the alternatives, ranging as high as $85 million per year (Appendix B, p. B-6).

While the DEIS does not include VHT and VMT totals in the performance measures presented relative to Purpose and Need, it discusses them briefly in Section 5.8.3, "Regional and Statewide Traffic Impacts" (p. 5-41). Rather than present the numbers for each of the scenarios, the DEIS summarizes the results in text, giving the range of results across all alternatives. As to VHT, the DEIS says only: "Overall vehicle-*hours* of travel remain the same, varying within a tight range of -0.5% to +0.8%." (p. 5-41). As to VMT, curiously, the DEIS describes an increase of over 3 percent as "a very small effect on traffic volumes throughout the region as a whole" (p. 5-41), even though the percentage increase is more than ten times as great as the increase in employment discussed in Section 1.0, above. That increase was labeled "high." This is yet one more case of the DEIS authors' misleading data presentation. 3.4.3

2.5 Reduce existing and forecasted traffic congestion on the highway network in Southwest Indiana

The DEIS concedes that traffic congestion is lower in the Study Area than in the rest of Indiana, raising serious questions whether there is any congestion-related "need" for this project. Nevertheless, the DEIS lists reducing traffic congestion as one of the project's purposes. If there is such a "need," none of the I-69 alternatives address it in a significant way. Among the five "preferred" alternatives, none reduces congestion by even 3%, and one (Alternative 3B) actually increases it. Moreover, the DEIS's presentation of traffic congestion data is highly misleading.

Discussing traffic congestion in Southwest Indiana, the Purpose and Need chapter concludes:

> The highway network is generally less congested in the Study Area than in the state as a whole. Both rural and urban Interstates are significantly more congested elsewhere in the state than they are in the Study Area. (p. 2-21)

Given that the Study Area is a relatively low congestion area, it is arguable whether there is a congestion-related "need" at all. The true benefit of reduced congestion is travel time (VHT) savings. Travel time is discussed in Section 2.4. 2.3.1

If there is a need to reduce congestion, the alternatives fail to address it. Appendix A lists six congestion measures:

1) Volume to Capacity (v/c) Ratio on Major Highways in Study Area, Weighted by VMT
2) Percentage of Congested Roadway Lane Miles in Study Area
3) Percentage of Congested VMT in Study Area
4) Percentage of Congested VHT in Study Area
5) Percentage of VHT Operated in Delayed Conditions in Study Area
6) Efficient System Performance Index ("ESPI") by VHT for Study Area.[8]

The first item, "Volume to Capacity Ratio," is not by itself a measure of congestion, because congestion is only present at high v/c ratios. Where v/c ratios are not high, there is little or no congestion and changes in v/c do not reflect significant differences in congestion. 3.4.3

The second item, "Percentage of Congested Lane Miles in Study Area," is one of the most misleading presentations in the DEIS. The DEIS shows that the percentage of congested lane miles decreases slightly with construction of each of the alternatives. In fact, the total number of congested lane miles actually increases over the No-Build in two of the alternatives, including "preferred" Alternative 3B, and decreases by less than 3% 3.4.3

[8] DEIS, Appendix A, p. A-20.

in all of the others. The number of congested lane miles, not the percentage, is what actually matters. If the total number of congested lane miles is increased with an alternative, this means that more of the roadway system is congested than in the No-Build alternative. 3.4.3

Restated in terms of lane miles, a graph of the congestion data looks like the following.

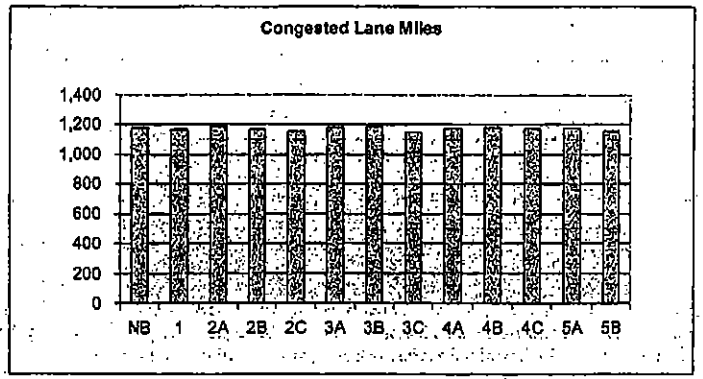


Figure 14: Lane Miles of Congestion in the Study Area by Build Alternative, date from DEIS Table 3-7, p. 3-35 and model files, graphed by Smart Mobility, Inc.

The DEIS's use of the percentage of congested lane miles, rather than the total number, is exceedingly misleading. It creates a false, apples-to-oranges comparison between each of the "build" alternatives and the No-Build. That is because, for the build alternatives, the number of lane miles in the Study Area is significantly higher than for the No-Build -- since the No-Build does not include any lane-miles for a new I-69.

Presenting the raw data helps clarify this point. The table below contains the data required to produce Figure 14 above.

Alternative	DEIS Reported % Congested Lane Miles	Study Area Lane Miles	Study Area Congested Lane Miles
NB	9.87	11,968	1,181
1	9.79	11,914	1,166
2A	9.63	12,291	1,184
2B	9.46	12,352	1,168
2C	9.28	12,422	1,153
3A	9.45	12,493	1,181
3B	9.46	12,504	1,183
3C	9.17	12,497	1,146
4A	9.42	12,434	1,171
4B	9.45	12,478	1,179
4C	9.34	12,541	1,171
5A	9.45	12,481	1,179
5B	9.25	12,485	1,155

Table 3: Lane Miles of Congestion in the Study Area by Build Alternative, Smart Mobility, Inc.

The DEIS reports that 9.87 percent of the lane miles in the No-Build alternative are "congested," meaning they have a volume-to-capacity ratio greater than 0.99. Only the percentage of congested lane miles for each alternative is presented. The percentage of congested lane miles is less than the No-Build for each alternative, so we are led to believe that there is less congestion in each of the build alternatives.

However, the DEIS does not present the total number of lane miles for each alternative. To determine the actual number of congested lane miles, the percentage must be multiplied by the base. What the DEIS fails to convey to the reader is the fact that the build alternatives have more lane miles than the No-Build because of the newly constructed I-69 roadways.[9] In the No-Build, there are 11,968 lane miles in the Study Area. In Alternative 3B, for example, there are 12,504 lane miles. Multiplying these totals by the percentages reported in the DEIS yields the number of congested lane miles, which is 1,181 for the No-Build and 1,183 for Alternative 3B.

Thus, there are actually more congested lane miles in Alternative 3B, despite the fact that the reported percentage of congested lane miles is smaller than the No-Build value. As for the other "preferred" alternatives, Alternatives 4B and 4C reduce total congested lane miles by less than 1 percent and Alternatives 2C and 3C reduce them by less than 3 percent. These reductions are too small to be noticed by the public.

The range of differences for the other four congestion measures is also small. The greatest differences are: percent of congested VMT 3.4 percent, percent of congested 3.4.3

[9] This data from the DEIS study shows a smaller number of total lane-miles in Alternative 1 than in the No-Build scenario. This outcome, which is obviously wrong, apparently results from the error discussed in Section 2.2 above.

VHT 1.8 percent, percent VHT in delayed conditions 3.7 percent, and ESPI by VHT 3.5 percent.

3.4.3

The most important congestion measure is vehicle hours of travel (VHT). Traveling on a longer and less congested route is not of much benefit if no time is saved. As discussed in Section 2.4 above, none of the alternatives reduce VHT by even 1 percent, and some of them actually increase it.

2.6 Reduce traffic safety problems

None of the I-69 alternatives considered in the DEIS would significantly improve traffic safety in the Study Area. Indeed, none of them would reduce accident costs in the region by even 1 percent.

With regard to traffic safety, the DEIS compares build alternatives on the basis of accident reductions by alternative. Once again, like so many other statistics in the DEIS, these figures represent only the difference between the No-Build scenario and each of the alternatives, without including the context of the total accidents in the study area. Presenting the data this way gives the false impression that the accident reductions are great and that there are significant differences between alternatives.

3.4.3

The DEIS includes separate forecasts for the change in injury accidents and property damage accidents (pp. 3-36 – 3-38). It also converts these differences in annual accidents into monetary cost (Appendix B, p. B-5). Developing an economic cost measure for accidents is common practice. Injury accidents are weighted higher in the total, and property damage accidents lower. The cost measure can serve as a single accident performance measure.

We have had to rely on the accident cost measure instead of the accident number measures because none of the materials that INDOT's consultants provided us describes the total number of accidents. We were able to extract total costs of all accidents from the NET_BC post-processor forecasts provided by INDOT's consultants. As shown below in proper context, the accident reductions are exceedingly small and there is no significant difference between the build scenarios. In fact, none of the build alternatives results in even a 1 percent reduction in accident cost in the Study Area.

3.4.3

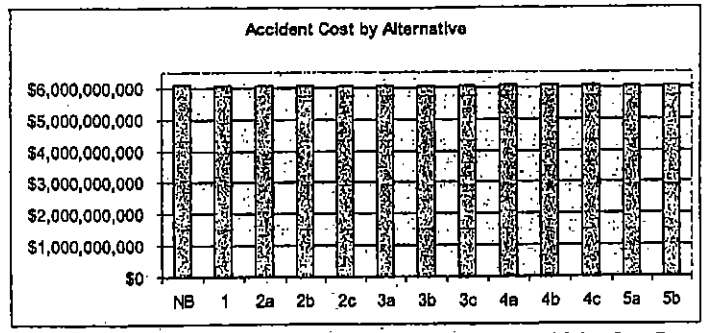


Figure 15: Accident Cost By Build Alternative, Year 2025, Smart Mobility, Inc.; Data from "Benefit Allocation Spreadsheet - Version 4.xls", INDOT

Figures 3-14 and 3-15 in the DEIS (p. 3-37) show that the pattern of the number of injury accidents is virtually identical to the pattern for property damage accidents. As the accident cost numbers are proportional to a weighted average of these two numbers, the change in the number of accidents will directly track the change in accident costs. Therefore, for each of the alternatives the reduction in number of accidents also will be less than 1 percent.

2.7 Increase accessibility for Southwest Indiana businesses to labor, suppliers, and markets

While improving business accessibility may be a worthy goal, the manner in which business accessibility is measured and compared in the DEIS is misleading at best. Once again, when the figures are presented properly, with total figures included so there is a proper basis for comparison, it is clear that none of the I-69 routes improves business accessibility by more than a few percentage points, and that the differences between alternatives are equally small.

Figures 3-16 and 3-17 on page 3-40 of the DEIS, entitled "Increase in Business Accessibility to Labor and Consumer Markets" and "Increase in Business Access to Buyer and Supplier Markets," suggest that there is significant variation between the proposed alternatives in terms of how much they will affect business accessibility in the Study Area. However, the figures are misleading because, once again, total business accessibility is not included.

3.4.4

Considering business accessibility improvements in the context of total business accessibility in the Study Area provides a more accurate picture of the magnitude of the

changes and the actual difference between alternatives. Figures 16 and 17 below show business accessibility to labor and consumer markets, and to buyer and supplier markets, for each alternative as a percent of the No-Build total. These two figures demonstrate that the actual changes in overall business accessibility resulting from each alternative are very small, and that the differences between alternatives are equally small. 3.4.4

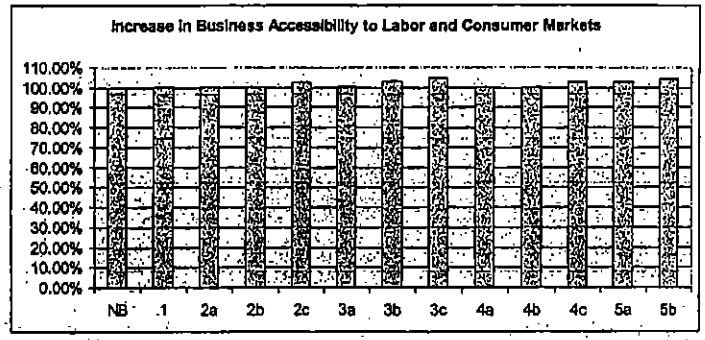


Figure 16: Increase in Business Accessibility to Labor and Consumer Markets By Build Alternative, Year 2025 (Dimensionless variable – No-Build = 100%), Smart Mobility, Inc.; Data from Table B-5, p. B-8, I-69 DEIS Appendix

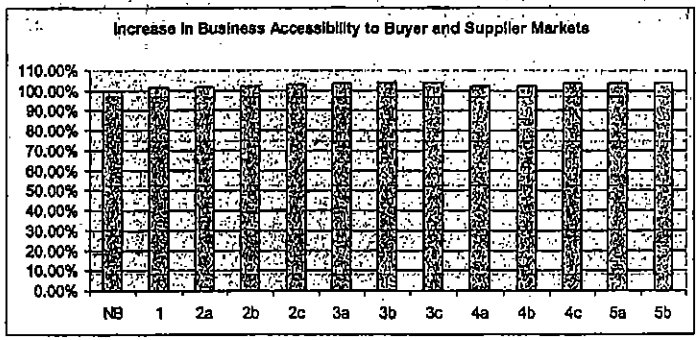


Figure 17: Increase in Business Accessibility to Buyer and Supplier Markets By Build Alternative, Year 2025 (Dimensionless variable – No-Build = 100%), Smart Mobility, Inc.; Data from Table B-6, p. B-9, I-69 DEIS Appendix

2.8 Support sustainable, long-term economic growth (diversity of employer types)

According to the Purpose and Need chapter of the DEIS, the Study Area suffers from low rates of growth, high unemployment rates and low personal incomes (pp. 2-26 – 2-29). These may be valid concerns, but the DEIS's figures establish that none of the I-69 alternatives addresses these needs.

For example, Figure 3-20 (p. 3-46) shows that the alternatives would increase regional employment by at most 4300 jobs in 2025. As elsewhere in the DEIS, this number is put forward without any context, so it is impossible to determine its significance. Table 1 (p. 8) of Technical Report 5.3.2, Regional Economic Impact Analysis, shows that total regional employment in 2025 in the No-Build scenario is 1,617,400. The maximum potential increase of 4300 represents an increase of only 0.27 percent, or just over one-quarter of one percent. For comparison purposes, the increase in employment between the 2000 base and 2025 No-Build scenarios is approximately 70 times as much. As demonstrated by the chart below, the highway's contribution to employment growth would be trivial. 3.4.4

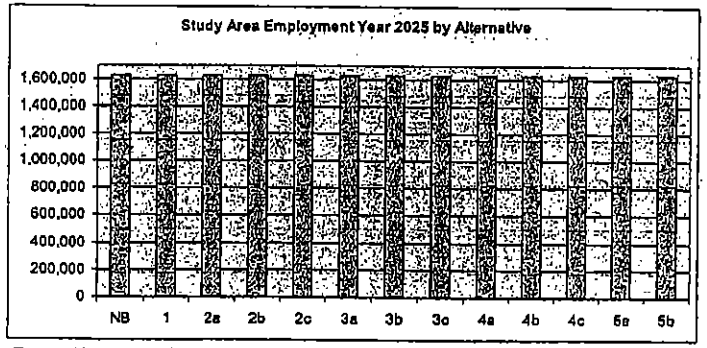


Figure 18: Rescaled Version of Figure 3-20: Increase in Study Area Employment (Year 2025), p. 3-46, I-69 DEIS, Smart Mobility Inc.

As shown in the graphics below, employment in high growth industries and employment in high paying industries are also essentially unchanged across the alternatives. The differences reported between alternatives are miniscule with respect to the projected totals or even compared to the projected no-build change between 2000 and 2025. 3.4.4

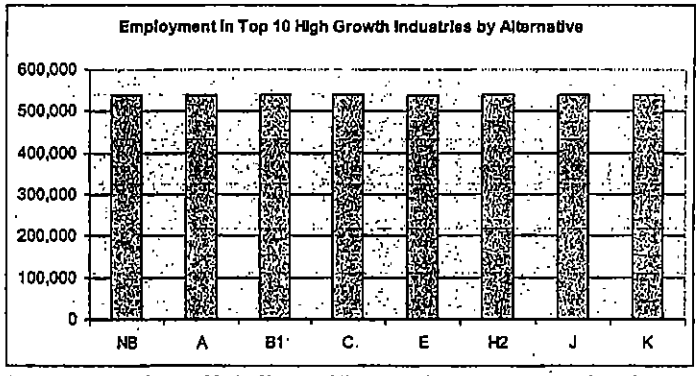


Figure 19: Data from Table 1 of Regional Economic Impact Analysis: Technical Report 5.3.2, graphed by Smart Mobility Inc.[10]

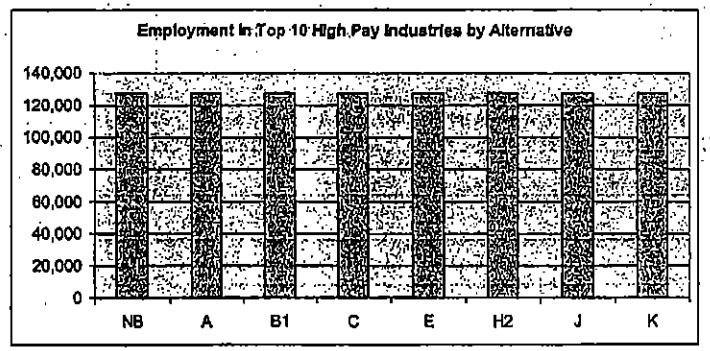


Figure 20: Data from Table 1 of Regional Economic Impact Analysis: Technical Report 5.3.2, graphed by Smart Mobility Inc.[11]

[10] The figure includes all of the alternatives included in Technical Report 5.3.2. The DEIS does not provide similar numbers for the refined (Level 3) alternatives. However, the refined alternatives are very similar to the earlier Route Concepts, and would not noticeably affect these calculations.

[11] The figure includes all of the alternatives included in Technical Report 5.3.2. The DEIS does not provide similar numbers for the refined (Level 3) alternatives. However, the refined alternatives are very similar to the earlier Route Concepts, and would not noticeably affect these calculations.

As Table 4 below shows, for the other performance measures in this section of the DEIS the differences between alternatives are even smaller

Economic Performance Measures in DEIS	Maximum difference from No-Build scenario
High Growth Industry Employment growth (with respect to total employment, not just high growth industry employment)	0.14%
High Pay Industry employment growth (with respect to total employment, not just high paying industry employment)	0.10%
Change in ratio of employment to labor force	0.02%
Change in young working age population (with respect to total employment, not just young working age population)	0.18%

3.4.4

Table 4: Calculated by Smart Mobility Inc. from data in the DEIS and Level 2 Alternatives Analysis Report Task 5.3.2 Regional Economic Impact Analysis

As Figures 18, 19 and 20 and Table 4 demonstrate, none of the alternatives makes any real difference to economic development in Southwest Indiana. As is shown in the following section, none of the alternatives makes any real difference in terms of income either.

2.9 Support economic development that benefits a wide spectrum of Southwest Indiana residents (distribution of economic benefits)

With respect to the distribution of economic benefits, the data shows that, on a region-wide basis, the average person would be no better off with the highway than without it. Moreover, the DEIS fails to analyze meaningfully which areas will suffer economically if a new highway is built.

Population and the workforce are expected to grow slightly with any of the alternatives, but again these increases are very small relative to the No-Build total. The small increase in jobs of up to 0.27 percent is almost balanced by the small increase in workers, because as discussed in the previous section, the ratio of jobs to workforce is virtually unchanged across all scenarios. This leaves people just about as well off economically as they would have been without the project.

While the DEIS shows disposable income going up slightly (Figure 3-19, p. 3-46), the backup data show that a more meaningful measure, per capita disposable income, goes down for several alternatives and is unchanged for the rest. Per capita income is a more meaningful measure than total income because it shows whether the average person is better or worse off. Suppose your community's income increases by 1 percent while

3.4.4

population increases by 10 percent. The disposable income is up; per capita disposable income is down. The members of the community are worse off, on average.

Data on per capita disposable income is excluded from the DEIS. To find it, one must go to the background reports. Table 1 of *Regional Economic Impact Analysis: Technical Report 5.3.2* shows reductions in disposable income of $100 per person per year for scenarios B1, C, H2 and K, and no change for the others.[12] While the decreases are small, it is wrong for the DEIS to claim that an increase in total income, split into smaller pieces due to a larger population, is somehow beneficial. 3.4.4

The authors of the DEIS apparently considered the decreases in per capita disposable income to be information that is negative regarding the new terrain alternatives, and they did not include it in the DEIS. In contrast, information showing very small decreases in transfer payments per capita ($3-$10) is included.[13] The most significant conclusion to draw from all of this income information is that the differences between the scenarios are too small to be important. 3.4.4

While focusing on these miniscule differences, the DEIS falls far short of meaningfully analyzing the "distribution of economic benefits" and costs resulting from a new highway. It only includes aggregate numbers for the entire Study Area, rather than analyzing which areas will be economic "winners" and which will be "losers." 3.4.4

Section 5.5.3 of the DEIS (pp. 5-34 – 5-35) begins to address this issue. It attempts to estimate changes in local business sales in each alternative corridor, as well as negative impacts for business taken from the US 41 and SR 37 corridors. However, the discussion implies that there could be a net positive benefit if access to existing businesses is maintained.

As discussed above, the construction of any of the alternatives will have very little impact on regional population, employment, income, and travel. Therefore the total economic activity "pie" is about the same under any alternative, including the No-Build alternative. Researchers have found that constructing new expressways generally does not increase regional population and employment. Instead it shifts them from some areas to others. Economists Marlon G. Boarnet of University of California at Irvine and Andrew F. Haughwout of the Federal Reserve Bank of New York reviewed research in a paper published by the Brookings Institution. 3.4.4

> In sum, the evidence suggests that highways influence land prices, population, and employment changes near the project, and that the land use effects are likely at the expense of losses elsewhere. . .

[12] The figure includes all of the alternatives included in Technical Report 5.3.2. The DEIS does not provide similar numbers for the refined (Level 3) alternatives. However, the refined alternatives are very similar to the earlier Route Concepts, and would not noticeably affect these calculations.
[13] DEIS, Table 3-28, p. 3-48.

> The evidence discussed above, especially the census tract population and employment studies, suggests that highways can be conduits for decentralization, helping to channel urban growth in some places rather than others. Furthermore, the evidence on negative spillovers suggests that locations that gain due to highway access do so in part at the expense of other locations. Highway projects confer economic advantages on some places and the relative pattern of comparative advantage can be expected to, and appears to, influence the location of economic activity and growth within and across metropolitan areas. . .
>
> The evidence summarized in Section III suggests that modern highway projects typically bring localized benefits, often for only a part of a metropolitan area or region. Further, the evidence implies that much of the economic impact of highways is to shift activity across the landscape, suggesting that some local benefits are, in part, at the expense of other places that might lose economic activity as a result of a highway project.[14]

Construction of a new roadway will disrupt local economies. Gains in sales in some areas will be balanced by losses in others. Not all of the losses will be in the US 41 and SR 37 corridors. Other losses will be in small downtowns throughout southwestern Indiana. The project need is: "Support economic development that benefits a wide spectrum of Southwest Indiana residents (distribution of economic benefits)" (p. S-2). To meaningfully analyze the impacts of I-69 alternatives with respect to this goal, the DEIS should go much further in identifying the economic winners and losers. 3.4.4

2.10 Facilitate interstate and international movements of freight through the I-69 corridor, in a manner consistent with the national I-69

For the third core goal, improving freight movement in the I-69 corridor, the DEIS selects as a performance measure daily truck travel hours saved in 2025. Once again, the DEIS presents the data in a misleading fashion. In fact, none of the I-69 alternatives has more than a trivial impact on truck travel hours – the greatest savings that any of the alternatives achieves amounts to less than one-half of one percent.

To evaluate the ability of each alternative to effectively move freight, the DEIS calculates for each alternative the number of truck hours and savings relative to the No-Build scenario. Once again, the DEIS presents the data, in Table 3-29 and Figure 3-25 (pp. 3-50 – 3-51), in the form of the "Gee-Whiz Graphic." The DEIS shows the number of daily

[14] Boarnet, Marlon G. and Andrew F. Haughwout. "Do Highways Matter? Evidence and Policy Implications of Highways' Influence on Metropolitan Development." The Brookings Institution Center on Urban and Metropolitan Policy, August 2000 (http://www.brookings.edu/dybdocroot/urban/boarnetexsum.htm).

truck hours saved for each alternative, but does not include the number of total truck hours in the No-Build alternative. Alternative 3B reportedly saves 4,500 daily truck hours. But without knowing the amount of total truck travel time in the region, how can we evaluate the significance of this time savings? 3.4.5

We have calculated from data provided by INDOT's consultant that daily truck hours in the No-Build scenario total roughly 1.1 million in 2025. Therefore, the truck travel time savings in Alternative 3B, which saves the most truck hours, represents less than one-half of one percent of the total. For each of the alternatives, when the total number of truck hours is presented, it is clear that the savings in truck travel time is trivial.

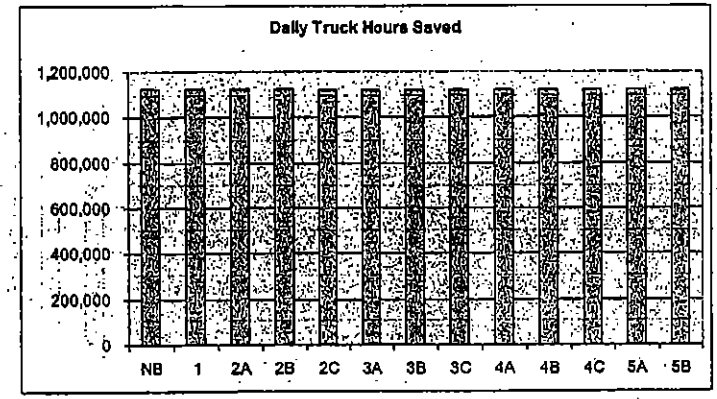


Figure 21: Rescaled Version of Figure 3-25: Daily Truck Hours Saved (Year 2025), p. 3-51, I-69 DEIS, Smart Mobility Inc.

2.11 Connect I-69 to major intermodal facilities in Southwest Indiana

As with the other performance measures, when shown in proper context as in Figure 22 below, the improvement in accessibility to intermodal facilities with any of the alternatives is very small. 3.4.5

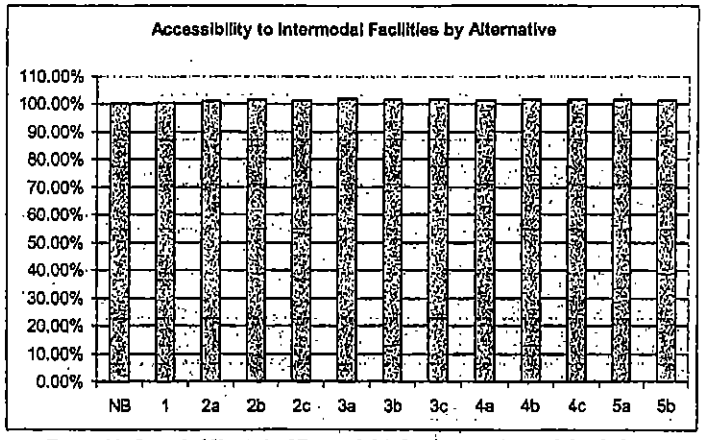


Figure 22: Rescaled Version of Figure 3-26: Increase in Accessibility Index to Intermodal Centers (Year 2025), p. 3-52, I-69 DEIS, Smart Mobility Inc.

3.0 Summary of All Nine Needs

It is clear from the preceding discussion that for none of the stated project purposes do any alternatives provide significant benefits whatsoever. The table below summarizes these findings by project purpose. 3.4.7

Purpose	Purpose Description	Benefits Summary
1*	Improve Evansville-Indianapolis Transportation Linkage	These benefits affect such a small number of trips per day that their effect is negligible
2*	Improve Personal Accessibility for SW Indiana Residents	Very minor change from No-Build for all scenarios
3	Reduce Traffic Congestion on SW Indiana Highways	Very minor change from No-Build for all scenarios. Some worsen.
4	Reduce Traffic Safety Problems	Negligible change from No-Build for all scenarios.
5	Increase Market/Labor Accessibility for SW Indiana Businesses	Very minor change from No-Build for all scenarios.
6	Support Sustainable, Long Term Economic Growth	Negligible change from No-Build for all scenarios.
7	Economic Development - Benefit Spectrum of SW Indiana Residents	Negligible change from No-Build for all scenarios.
8*	Facilitate Freight Movement through the I-69 Corridor	Negligible change from No-Build for all scenarios.
9	Connect I-69 to Major Intermodal Facilities in SW Indiana	Very minor change from No-Build for all scenarios.
* Core Project Goal		

3.4.7

Table 5: Project Benefits by Purpose, Smart Mobility, Inc.

Especially striking is the fact that no alternative provides any appreciable benefits with regard to the three "core" project goals (goals 1, 2, and 8), except that any of the build alternatives can serve as part of the national I-69. Also notable is the fact that there are no significant differences among alternatives on any of the project goals.

Furthermore, as discussed in Section 2.1 above, the DEIS overstates the benefits of certain of its "preferred" alternatives (2C, 3B, 3C and 4C, as well as 5B). By including I-70 improvements in the No-Build scenario while excluding SR 37 improvements, the DEIS has biased the results in favor of these alternatives and to the detriment of Alternative 1.

There are, however, two criteria upon which the alternatives are judged where there is significant variation between alternatives: 1) construction costs and 2) operation and maintenance costs. These values are presented in the DEIS (pages 3-52 and 3-53), but no figures are devoted to them. Such figures are very telling, as can be seen below.

3.4.6

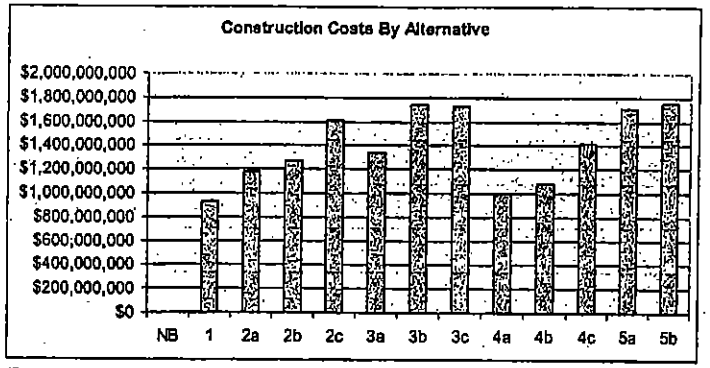


Figure 23: Construction Costs by Build Alternative, Smart Mobility, Inc.; Based on data from Table 3-33: Capital Cost and Mileage Estimates of Alternatives Carried Forward for Detailed Study, p. 3-52, I-69 DEIS

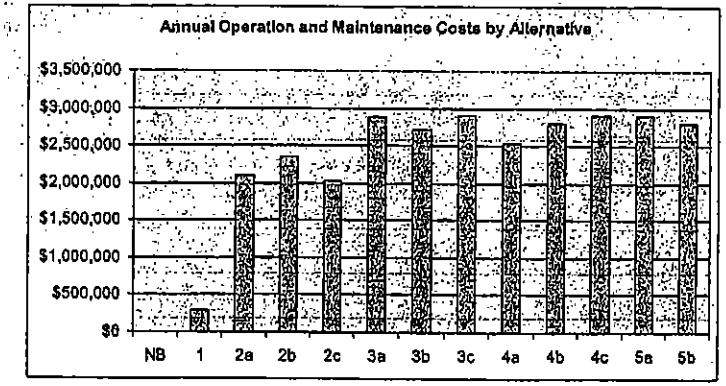


Figure 24: Operation and Maintenance Costs by Build Alternative, Smart Mobility, Inc.; Based on data from Table 3-34: Annual O&M Cost Increases, Alternatives Carried Forward for Detailed Study, p. 3-53, I-69 DEIS

Given the high costs of all of the alternatives, and the small benefits shown by the DEIS study's own data, the DEIS should include a comprehensive cost-benefit analysis. It is

3.4.1

critical that both Indiana and U.S. taxpayers get a reasonable return on their transportation investments. 3.4.1

While a properly executed cost-benefit analysis would greatly inform the judgment whether to pursue any of the I-69 alternatives, given the information currently available it would seem that, since none of the build alternatives provides significant benefits over the No-Build scenario, it would be unwise to make the large investment required to complete and maintain any of the project alternatives. However, if one were to select the best build alternative, based on the costs and benefits outlined above it would clearly be Alternative 1. 6.2

Qualifications and Experience

Smart Mobility, Inc. (SMI) was established in 2001 to plan and implement transportation solutions that provide mobility, are cost effective, preserve environmental quality, and enhance the quality of life. SMI's staff combines expertise in traffic engineering, economics, environmental science, and computer science. We believe in an open process, and strive to make our analyses understandable by the public, whom we consider to be an integral part of the planning process. Current SMI projects include:

Chicago Metropolis 2020 (with Fregonese Calthorpe Associates)-The Commercial Club of Chicago, a prominent business and civic organization in the Chicago Area, began a planning and visioning process several years ago to address a broad set of issues including sprawl, land consumption, economic opportunity, and urban decay. SMI has developed a smart growth transportation strategy for the region which is matched to a smart growth land use scenario developed by FCA. These strategies are now being compared to a business-as-usual scenario using a set of performance measures of land use, accessibility, the environment, and social equity.

Baltimore Vision 2030-SMI is working with a coalition of organizations, including the Baltimore Metropolitan Planning Council, the Baltimore Regional Partnership, Environmental Defense, and others to develop a future vision for the Baltimore area. SMI developed alternative future land use and transportation scenarios, and prepared social and environmental indicators for each scenario.

River Fields - SMI is working with this Louisville-based environmental group with a mission of protecting the Ohio River environment and its historic resources. SMI has helped review and prepare comments for a Draft Environmental Impact Statement for a proposed new Ohio Review crossing. This review included congestion, safety, truck movements, roadway alternatives, land use impacts, and air pollution.

Essex Rail Analysis – SMI is working with the Chittenden County Metropolitan Planning Organization to refine ridership estimates for proposed commuter rail service between downtown Burlington and Essex Junction.

Pennsylvania Route 41/S.A.V.E. – SMI is working with a local group in southeastern Pennsylvania to develop alternatives to a proposed new four-lane bypass to Route 41. Concepts under consideration include: traffic calming, truck restrictions, land use regulation, and roundabouts.

Resumes for SMI staff members who contributed to this report are attached.

smart mobility
NORMAN L. MARSHALL
nmarshall@smartmobility.com

EDUCATION:

Master of Science in Engineering Sciences, Dartmouth College, Hanover, NH, 1992
Bachelor of Science in Mathematics, Worcester Polytechnic Institute, Worcester, MA, 1977

PROFESSIONAL EXPERIENCE:

SMART MOBILITY, INC, Norwich, VT
PRESIDENT
November 1, 2001 – Present
Mr. Marshall helped found Smart Mobility, Inc. in 2001 and is its President. Over the past several months, Mr. Marshall has managed large projects in the Chicago, Baltimore, and Louisville regions for clients that he had developed in his previous employment at Resource Systems Group, Inc., as well as a number of smaller projects.

RESOURCE SYSTEMS GROUP, White River Junction VT
SENIOR ASSOCIATE, AREA DIRECTOR, SENIOR PROJECT CONSULTANT
October 1987 - October 2001
During his 14 years at Resource Systems Group, Mr. Marshall developed a national reputation for innovative work in regional travel demand modeling and transportation/land-use interactions. His experience includes developing travel demand models for Burlington Vermont, Portland Maine, Syracuse New York, the New Hampshire Seacoast region, and a statewide model for Georgia. He has completed many projects in Vermont covering areas including estimating traffic volumes, traffic operations, traffic impact studies parking, transit needs, and transit operations.

RELEVANT PROJECTS (PARTIAL LIST)
State Routes 5 & 92 Scoping Phase—evaluating Transportation Systems Management (TSM), Transportation Demand Management (TDM), transit and highway widening alternatives for the New York State Department of Transportation using local and national data, and a linkage between a regional network model and a detailed subarea CORSIM model.

Trip Generation Characteristics of Multi-Use Developments—estimated internal vehicle trips, internal pedestrian trips, and trip-making characteristics of residents at large multi-use developments in Fort Lauderdale, Florida.

L&M Park, South Burlington, Vermont—evaluated impacts of a proposed mixed use development on an entire urban arterial corridor. As a result of the study, a mitigation strategy was adopted that included formation of a Transportation Management Association (TMA).

MEMBERSHIPS/AFFILIATIONS
Associate Member, Institute of Transportation Engineers
Individual Affiliate, Transportation Research Board
Member of Board of Directors, Vital Communities (Vermont/New Hampshire)

RECENT PUBLICATIONS AND PRESENTATIONS
Evidence of Induced Travel with Bill Cowart, presented in association with the Ninth Session of the Commission on Sustainable Development, United Nations, New York City, April 2001.

Induced Demand at the Metropoliton Level – Regulatory Disputes in Conformity Determinations and Environmental Impact Statement Approvals, Transportation Research Forum, Annapolis November 2000.

Evidence of Induced Demand in the Texas Transportation Institute's Urban Roadway Congestion Study Data Set, Transportation Research Board Annual Meeting, Washington D. C: January 2000.

smart mobility

LUCINDA GIBSON, PE
lgibson@smartmobility.com

EDUCATION:

Master of Science in Engineering Sciences, Dartmouth College, Hanover, NH
August 1986 - June 1988

Bachelor of Science in Engineering, University of Vermont, Burlington, VT
August 1979 - June 1983

PROFESSIONAL EXPERIENCE:

SMART MOBILITY, INC, Norwich, VT
VICE PRESIDENT
November 1, 2001 – Present

Manages and undertakes a variety of projects involving analysis of land use/transportation interactions. Project focus areas include regional transportation infrastructure planning and analysis; and review of projects and development of alternative projects in the NEPA process for municipalities or interveners. Project work includes developing alternative conceptual designs for future land use/transportation scenarios at a local or regional scale; transportation improvement cost analysis; conceptual design and analysis of transportation and transit facilities, and impact assessment for transportation projects. Current clients include primarily non-profit organizations and planning agencies.

TWO RIVERS-OTTAUQUECHEE REGIONAL COMMISSION, Woodstock, VT
SENIOR TRANSPORTATION PLANNER– *www.trorc.org*
October 1994 – October 2001

Managed regional transportation planning program for a rural 27-town region in central Vermont. Prepared the Regional Transportation Plan, and prepared a regional Transportation Improvement Program for incorporation into the Vermont Statewide Transportation Improvement program. Implemented extensive public involvement program for transportation planning and project development; assisted communities in planning, conceptual design, and cost analysis of transportation improvements; conducted Scenic Byway and Bicycle/pedestrian planning and design studies; assisted municipalities in addressing traffic circulation, pedestrian transportation and parking issues in their downtown area plans.

RESOURCE SYSTEMS GROUP, White River Junction VT
ENGINEER/ANALYST
November 1998 - October 1994

Contributed to a variety of local and regional transportation planning, traffic impact assessment and feasibility studies at a transportation consulting firm.

PROFESSIONAL CERTIFICATIONS
Professional Engineer – P.E., Vermont Board of Professional Engineering, License #6133

Lang Farm and Production Park Development—used the transportation network model developed for the Chittenden County MPO to conduct a select zone analysis in TMODEL for two proposed retail developments. The vehicle trips entering and exiting the project site were tabulated for air quality permitting purposes.

Reviewing Regional Transportation Models— reviewed air quality conformity determination analyses, long-term transportation plans and Environmental Impact Statements in Tempe, Arizona, Atlanta, Georgia, Houston, Texas, Las Vegas, Nevada, and Salt Lake City, Utah.

Highway Investments and Induced Demand Travel—under contract with the Environmental Protection Agency, determined the extent to which the overall transportation planning and 4-step modeling processes account for induced demand, and the extent to which the individual components of different transportation planning and modeling methodologies account for induced demand

smart mobility

BRIAN R. GRADY
bgrady@smartmobility.biz

EDUCATION:

Bachelor of Science in Engineering Sciences, Bates College, Lewiston, ME, 1998
Bachelor of Engineering, Dartmouth College, Hanover NH, 1999

PROFESSIONAL EXPERIENCE:

SMART MOBILITY, INC, Norwich, VT
TREASURER
November 1, 2001 – Present

Mr. Grady is a founding member of Smart Mobility, Inc. He works on projects in transportation planning and traffic impact requiring the application and development of regional transportation network models. Mr. Grady has been actively involved in the review of network models, particularly as they relate to the air quality conformity determination process.

RESOURCE SYSTEMS GROUP, White River Junction VT
ASSOCIATE
July 1999 – October 2001

Contributed to a variety of transportation planning, transportation modeling, and impact assessment studies, including the following partial list of projects:

Winooski Downtown Revitalization—developed CORSIM model of the downtown area to analyze the impact of new retail/office development and a new one-way circulation proposed to provide a more pedestrian friendly environment.

Airport Drive Relocation—added roadway and land-use detail to the existing Chittenden County travel demand model in order to analyze the impact of extending Airport Drive, which provides access to the Burlington International Airport.

Burlington One-Way Circulation Study—used the Chittenden County travel demand model to identify one-way street pairs for potential two-way conversion. A Level of Service analysis for 15 major intersections in the downtown area was conducted for the Department of Public Works.

Rochester Connector Road Study—used the Seacoast "Megamodel" to study the impacts of a proposed connector road linking two major arterials in Rochester, New Hampshire. A turning movement and select link analysis in TMODEL was conducted to determine which vehicle trips would shift onto the new connector road.

smart mobility

JOLYON RIVOIR PRUSZINSKI
jrivoirp@smartmobility.biz

EDUCATION:
Bachelor of Science in Geography, Dartmouth College, Hanover NH, 2000

PROFESSIONAL EXPERIENCE:

SMART MOBILITY, INC, Norwich, VT
TRANSPORTATION ANALYST
July 15, 2002 – Present

Mr. Rivoir-Pruszinski is a transportation analyst, GIS specialist, and planner with SMI. He supports project work in the analysis of infrastructure investment plans, estimation of travel demand, and review of environmental impact statements.

HDR, INC, Portland, OR
TRANSPORTATION PLANNER
November 2000 – June 15 2002

North Sound Connecting Communities Project, Commuter Rail Feasibility Study: For the proposed commuter rail line connecting the major communities along the I-5 corridor between Everett, WA and the Canadian border Mr. Rivoir-Pruszinski developed the model for estimating ridership demand, drawing on sketch level planning tools available through the NCHRP. He also evaluated potential station development sites for environmental constraints and infrastructure needs.

Cross-Cascades Corridor Project, WSDOT, Planning Division: For the development of a Spatial Input-Output transport model for the US 2 and I-90 corridor in Washington State, Mr. Rivoir-Pruszinski headed up the effort to define and code the multi-modal transport network for use with MEPLAN modeling software. He also managed the development of specialized GIS tools for analyzing and visualizing model data.

Port of Portland Marine Economic Impact Study, Container Transportation Cost-Benefit Analysis: This analysis quantifies benefits accruing to shippers in the Pacific Northwest using the Port's container shipping facility. Mr. Rivoir-Pruszinski adapted the Linear Program Model used in the 'Breaching the Lower Snake River Dams' Study, and enhanced it using Visual Basic Programming for analysis of the similar multi-modal transport assignment issues.

Vancouver Rail EIS Environmental Justice Evaluation, WSDOT, Rail Division: Using efficient GIS analysis techniques, Mr. Rivoir-Pruszinski evaluated environmental justice concerns related to proposed rail corridor improvements to accommodate additional passenger train in the PNW Rail Corridor.

URBAN ENTERPRISE ASSOCIATION
P.O. Box 954
621 Poplar Street
Terre Haute, Indiana 47808
Telephone: 812 478-5718
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O. Earl Elliott, President
Judith A. Anderson, Mayor

September 3, 2002

Mike Grovak, Project Manager
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, Indiana 47715

Dear Mr. Grovak:

The Terre Haute Urban Enterprise Association would like to encourage the I-69 team to consider Indiana's current and projected budget constraints, the Federal budgetary burdens from the War on Terrorism and the priorities of citizens rather than politicians.

If one billion dollars were equally divided among Indiana's ninety-two counties, each county's share would be approximately 10.8 million dollars. Should we put that fact in the form of a referendum? Consider the impact $10,000,000 would make in a county, that is IF we had it. 2.3

This state and this country do not enjoy unlimited resources. To choose the luxury, the extravagance of the "preferred" alternative routes proposed is dooming the other transportation systems throughout the State of Indiana to the poverty Indiana is facing.

Please do not spend our dollars, our forest, our farmland and our manpower in such a frivolous manner. All of our future generations will suffer the consequences of such an irresponsible act.

With regards,

Tara A. Lane
Director

0903-016

November 5, 2002

Public Comment File
Michael Grovack
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, IN 47715

These comments are in response to the I-69 Indianapolis to Evansville Tier 1 Draft Environmental Impact Statement Summary as posted on the INDOT website.

All page number references are to the page of the printout of that posting.

Page 2 Purpose is to provide an improved transportation link which "Supports economic development in Southwest Indiana". Where did this goal come from? Is this a Federal mandate? A State mandate? Did this come from public input? Are such goals part of all INDOT project planning? If not, why for this project? I thought the purpose of highways was to provide a safe means of transportation-period. 2.3

Why is cost not mentioned as a consideration? We have a State budget under extreme pressure. Surely highway construction should be subject to the same cost reduction efforts as all other areas of State spending are! I don't want my Federal, Gasoline, and State taxes wasted to the tune of $200-800 million. (The difference between the cost of Alternative 1 and the various other alternatives.) In addition there is a lesser annual Operating and Maintenance cost for Alternative 1 according to Table S-2 although the report mysteriously fails to quantify the difference. 3.4.6

Goals do not include minimizing the environmental impact. Why? This is supposedly an Environmental Impact Statement but the majority of the report focuses on Economic Development!! Nor do they include doing the job at the least cost as a goal. Why?

Page 3 Process seeks to involve all interested parties throughout the process. But not to listen to them based on the evidence to date.

Page 4 This EIS is intended to resolve "whether or not to complete I-69 in Southwestern Indiana". This appears to be a complete lip service remark (repeated at other points in the study) since there is NO analysis or discussion of this option. There already is an interstate connection between Michigan and Texas, the purpose of the I-69 link, via I-69, I-70, I-57, I-55, and I-10. Its not like this has to be built because no link currently exists!

Page 6 An additional 10 acres was added beyond the footprint for these interchanges. Per interchange or for all interchanges? Certainly not enough for all interchanges. Certainly not enough in terms of total impact on land usage including the inevitable motels, fast food facilities, etc. that follow. Does this include the acres that will be impacted by earth removal needed to build the bridges, grade separations, and interchanges of each alternative? I note that the preferred alternatives have 50-85% more such impacts than the non-recommended Alternative 1. 5.1.3

There is no mention of the land needed for rest areas. Why not? Or won't there be any? Or is this another way to hide the true land usage impact of the various alternatives? 5.1.3

Page 8 Analysis in Chapter 5 includes "estimates of land taken by additional economic development which would result from a highway". Are these acres included in the Right-of Way acres impacted listed in Table S-6?

Project will "provide meaningful opportunities for the public to provide input". Reaffirmed by Mr. Nichol. But there is no statement that the input will be considered or listened to in making the decision. Letting people talk is cheap; listening to them and taking their thoughts and feelings into the decision process is harder. The evidence so far is that this project hears the concerns of citizens but doesn't listen to nor consider those concerns.

Page 10 Issues Involvement Team. Who was on this team? Did these stakeholders include persons not connected with INDOT, state government, or the construction industry? Did it include representatives from the cities and county governments of Southwest Indiana? 11.3

Page 12 Included in the key state policies is "quality of life". This appears to be ignored later in the report with regard to the farmers of Southwest Indiana in that the recommended alternatives would all destroy much more farm acreage than those not recommended. I'm sure the Amish settlements that will be impacted won't view their quality of life as being improved. 5.3

Page12 and 13 There are several rural counties "with crash rates significantly higher than statewide averages". This is an apples and oranges comparison! What is the comparison to other rural counties? Pulling more traffic into these counties via an Interstate will likely increase these rates even more.

The two hundred million dollars saved by using Alternative 1 could be used to improve these rural roads. The recommended alternatives with their higher annual maintenance costs means there will be even less state aid in future years to help these counties with their highway needs. One could argue that the net result will be higher crash rates, not lower rates. 2.3.1

Page 13 "Population and employment growth rates in Southwest Indiana –and in Indiana as a whole- have lagged significantly behind national averages during the last 30 years". A true statement but what does that have to do with this study. Are we to believe that this new Interstate will suddenly cause the population of Indiana to grow as fast as the national average?

It is worth noting an Institute for Southern Studies recent report titled Gold and Green 2000. The study ranks 20 economic and 20 environmental indicators. Those states with the best environmental health have the best economic health. 10 states are among the worst 15 on both lists. They include Indiana-48th in environmental ranking and 40th in economic ranking.

The proposed alternatives take more farmland, more wetland, etc. and will worsen our environment. If the past correlation continues to hold this will lessen our economic growth, not strengthen it as the report suggests! 3.4.4

Many factors enter into an area's economic development and to assert that the inadequacy of the area's highway system is an important factor seems unproven by facts. A major factor in Southwest Indiana has been the decline in mineral extractive activities, in oil and gas as reserves were depleted, and particularly in coal mining as the high sulfur coal of Indiana lost out in the marketplace to low sulfur sources. No many how new roads are built this economic activity will not return.

Another factor is that the Hoosier National Forest covers a lot of the area (it is part of six of the twenty six counties) thereby limiting both the number of people living there and the level of economic activity. Again, another road won't change that impact. 4.3.1

An additional factor is the geography of the area. The rugged terrain in many of the counties limits agricultural activity and is not conducive to factory construction. A new road won't change the geography! 4.3.1

There is little, if any evidence that the Interstates of Eastern Kentucky and West Virginia have solved the economic problems of Appalachia or that the two Interstates of North Dakota have solved the economic woes of its rural communities! Why should Indiana be different?

There also is no discussion of the negative economic impacts of various Alternatives. Any alternative that draws traffic away from the current "main route" of I-70/SR41 between Indianapolis and Evansville will obviously lessen the activities of the businesses along that route. If I eat a hamburger in Bloomington rather than in Vincennes on my way between the two termini then the economic activity in Vincennes will lessen and offset the increased activity in Bloomington. The net result is NO increased economic activity, only a shifting of where the activity takes place.

In the middle of this page there is a footnote that indicates the addition of lanes to I-70 between Indianapolis and Terra Haute are assumed to be a "given" that they will be built. In Table S-5 on page 19 where the costs of each alternative are given it is not indicated whether the cost for Alternative 1 is for Indianapolis to Evansville or Terre Haute to Evansville. I suspect it is for the former in which case the comparable costs of alternatives is completely misleading because a cost for Alternative 1 is included that will be spent regardless of which alternative is selected, thus way overstating the cost of Alternative 1. 3.4.6

Page 14 Table S-2 gives a relative ranking rather the estimated annual dollars for Operating & Maintenance Costs of each Alternative. What are the numbers? How many dollars that would be spent each year on the high O & M cost Alternatives would be available for other highway maintenance needs in Indiana if a lower O & M cost Alternative were selected??

Traffic safety for Alternative 1 is shown as "middle of the road". Given that Highway 41 has been known as the "Killer Highway" for years it is hard to imagine that making it an Interstate would not cause a major improvement in the safety of the road! The same deficiency appears in Table S-4.

Page 15 Adds three new alternative routes. It fails however to subject two of them to the screening criteria used in Table S-2 to narrow the number of routes. Why not?? (Table S-3 appears to have a major typo. Alternative C-1 is on US 231, not 321.) 3.3.3

Page 17 Transportation improvement to Bloomington will "increase the accessibility of its population to desired travel destinations". Bloomington already has four lane service to Indianapolis and Bedford. I'm betting 85% of the travel destinations of its residents are to those two cities. 2.3.1

There are a lot of assumptions in the Section entitled "Factors Associated with Highest Levels of Performance" with no hard data backing them up. The preceding is one. Others include the assertion that an Interstate will relieve congestion in the SR 37 corridor. Every time the interstates around Indianapolis are widened or added to, the traffic increases as the developers follow the roads "out" and sprawl increases. Anyone who travels I-65 from Whiteland to Indianapolis knows the traffic has gotten worse over the years as more lanes have been added not better. And since in earlier sections the report asserts that Indiana has a below national average population growth it can't be from that. 3.4.2

And how this will help relieve traffic on I-65 as claimed is beyond me. Who drives down I-65 to get to the areas served by SR 37?

"Service to Western Morgan County" discusses the need to improve the access to the intermodal facilities on the west side of Indianapolis. Do you really expect us to believe that more than a small fraction of the freight passing through those two facilities is going to western Morgan County. It would be meaningful if the study had looked at how much of the freight from those two facilities is headed north, east, and west versus the portion going to the south. 3.4.2

"Service to Crane..." asserts that this major employer represents an opportunity for economic development that is limited by its lack of transportation access. The economic activity at Crane is a function of Federal spending on Defense Department activities and has little to do with its road access.

The November issue of National Geographic magazine has an article on "Weapons of Mass Destruction". It indicates that Crane currently stockpiles Chemical Weapons and has in the past produced both Biological Weapons and Chemical weapons. I SERIOUSLY question if the citizens of Indiana want to have increased economic development of this nature!!

Furthermore a four lane highway already exists to within 10 miles of Crane. So it is not lacking transportation access!

Page 18 Why is service to Terre Haute not discussed?

Alternative 1 is shown as being inferior in travel time saving because the total trip will take 12 minutes longer. This appears to be a statement in support of one of the core goals "Facilitate interstate and international movements of freight through the I-69 corridor....." The distance between the two termini of I-69, Port Huron and Texas, is approximately 1,500 miles. Estimated travel time is 23 hours assuming no stops, 25-27 hours assuming stops for fuel, eating, bathroom, etc. and 33- 40 hours assuming stops for resting and sleeping. THE IMPACT ON THE TOTAL TRAVEL TIME OF THE "LONGER ROUTE" IS 0.5% TO 0.9%--in other words meaningless. All alternatives are "equal" on this measure. 3.4.3

There appears to be an inherent assumption that all traffic on the Interstate will travel the entire 155 mile distance. I bet the data shows that a significant portion of all Interstate traffic in Indiana travels less than 25-50 miles. The trip weighted time differential between the various alternatives would thus be significantly less than 12 minutes. 3.4.4

The discussion about improving service to Bloomington and the SR 37 corridor ignores this factor. Currently the 4 lane highways serving these two areas allow access from multi roads. An Interstate will certainly have fewer nodes of interchanges thus causing users to have to drive out of their way to use it. One can legitimately argue that the average user will drive more miles if current roads are replaced by an Interstate.

Page 20 Farmland impacts are "minimal" because they only represent 1.4% of the farmland loss expected to occur in the next 23 years in the area. If one assumes this same kind of loss continues then by the end of the century our grandchildren will farm on a landscape one-half its current size. Is this the inheritance we wish to give them? 4,000 acres lost here and 4,000 acres there and pretty soon we are talking real dirt.

The argument used here seems at complete odds with the argument used in other sections of the report about the slow economic development of Southwest Indiana. This section says 303,571acres (the midpoint of 3,500-5,000 acres divided by 1.4%) of farmland will be lost over the next 23 years in SW Indiana. Presumably this loss will occur as farmland is converted to housing, commercial buildings, factories, etc. That amount of loss implies a very healthy economic activity level– contrary to the report's assertion that only a new Interstate can save the economy of SW Indiana. 2.3.2

If what the report is really saying is that the 303,571 acres will be lost as result of the new Interstate, then the report is intellectually dishonest as this amount of acreage loss would be about 9% of the farmland in SW Indiana, not the 1.4% claimed in the report.

Page 21 The Wetlands discussion asserts that there are more wetlands than there were 50 years ago. I don't know any wetland scientist who would agree with that statement. 4.2.5

The Natural Heritage of Indiana book published in 1997 contains these comments on Indiana's wetlands. "Considering the millions of acres of wetlands that have been altered or destroyed in Indiana, it is not surprising that large numbers of wetland-dependent plant and animal species have become rare and endangered in Indiana."

"Wetlands are truly one of Indiana's endangered natural resources." Seven of the eighteen counties (40%) in Indiana with the highest percentage of wetland acreage are in the area discussed in this report. Thus the significance of losing even one acre is much more critical than making a comparison to a statewide number.

Social impact does not mention Alternative 1which would also avoid the neighborhoods around Indianapolis and Bloomington, and also apparently Terre Haute as it is not highlighted on the map on the same page.

Page 22 and 23 The discussion on Section 106 Historic sites fails to mention any input from the Historic Landmarks Foundation of Indiana. Was there any? It also glosses over the potential impact on historic farms and landscape features. These are among Indiana's truly richest inheritances and to dismiss them out of hand is an insult to our agricultural heritage.

They also can be a major tourist attraction, but not if they are destroyed.

Pages 23-32 The summary Pounds away at the high improvements in accessibility of the favored routes. Lets look at the facts:

89% of the population in the 26 county area (excluding Marion and Vanderburgh so as to not skew the data) are in counties having a 4 lane limited access highway within the county

64% (same exclusion) live in counties having interstate access within the county

91% (same exclusion) live in counties having an Interstate within, or within 15 miles, of the county.

There is NOT an accessibility issue!

Only 3 of the 26 counties do not have land within 20 miles of an Interstate. Those 3 (Knox, Daviess, and Lawrence) contain less than 5% of the population of the 26 county area (and only 11% of the total excluding Marion and Vanderburgh Counties).

8 of the 10 largest cities (excluding Indianapolis and Evansville) in the area are currently served by 4 lane highways. 2.3.1

REPEAT: There is NOT an accessibility issue that justifies spending an additional $200-800 million dollars for the "preferred" routes versus Alternative 1. With Alternative 1 only one county would not be within 20 miles of an Interstate.

Page 23 The Disadvantages of Alternative 1

"Poorest travel time between Evansville and Indianapolis." By a whole 12 minutes. As noted above, the majority of the traffic will not be between these two end points but travel on sections of the highway. A trip weighted time savings number would be a more accurate comparison.

"Poorest improvement in regional accessibility." As documented above, the region DOES NOT have an accessibility problem. This is a straw argument unproven by the facts.

"Poorest improvement of interstate and international movement....." As shown above, the difference between the various routes in terms of travel time along the entire I-69 route is miniscule –less than 1%. 6.2

"Poorest improvement to personal economic performance." Completely undocumented in the study. An assertion, not a fact.

"Lowest improvements to business accessibility." Completely undocumented in the report. As shown above 80% of the major cities and 89% of the population already are in close proximity to 4 lane highways.

"Low potential for reduction of crashes..." Undocumented. As noted above, this alternative would eliminate "Killer SR 41". 6.2

"Highest potential business relocations." If one compares Business relocations AND Homes relocations, the result is much different. The combined relocations of Alternative 1 are LESS than those of three of the Preferred Alternatives (2C, 3B, and 3C). Why are Homes relocations considered of less significance than Business relocations? 6.2

"Highest disruption of existing traffic.." True. However many of us have lived for years with highways under construction on our daily commutes and survived so again this is a straw issue.

"No improvement in access to Crane..." True. Again I question whether the citizens of the state want a producer of Weapons of Mass Destruction made more accessible.

There are 5 advantages listed for Alternative 1. Six of the supposed disadvantages are either not true or are undocumented as noted just above. "The low potential for reduction of crashes " is really an advantage as "Killer SR 41" would be eliminated. This leaves 2 disadvantages. You end up with Alternative 1 HAVING 6 ADVANTAGES and 2 DISADVANTAGES.

If similar adjustments are made for all the other Alternatives, one will find that none are superior to Alternative 1.

Page 32 "The critical issues ... have to do with farmland impacts, the extent and location of economic development..., the disruption of sensitive ecosystems, karst, and environmental resources." Alternative 1 is superior on 4 of these 5 issues but is subsequently dismissed. If it is superior on the Critical Issues AND costs significantly less than why isn't it recommended???

The entire thrust of this "Environmental Study" is on the economic impact of the various alternatives BUT it ignores the economic impact of the $200-800 million difference between the cost of Alternative 1 and the various others AND WHAT the State could do with these dollars in true "Economic Development".

Thank you for your time and consideration.

Terry Marbach
9704 W. Raintree Dr.
Columbus, IN 47201

Cc: Gov. Frank O'Bannon
Senator Richard Lugar
Senator Evan Bayh
Rep. Mike Pence
State Senator Robert Garton
State Rep. David Yount
Commissioner Brian Nicol, INDOT

To the Editor:

People today have a lot of education and have awesome technological opportunities available to them.
I really doubt though, that we have the discernment to use them properly. We are smart, but not very wise.
Proponents of the new terrain I-69 have many arguments for what they want, but these
are excuses, not reasons. They are excuses, because they are not reasonable.
One claim is that we need economic growth in Southern Indiana.
However, the Bloomington route would hinder the economies of many people:

1. The farm businesses along the route would suffer.
2. It will damage the business activities along U.S. 41.
3. The economy is worse in the counties between Evansville and Terre Haute than in the counties on the route to Bloomington.

They also claim to want safer roads for students who travel to Bloomington. However, U.S. 41 is more dangerous. Each year from 1988 to 1997 (according to the National Highway Traffic Safety Administration) more people were killed on U.S. 41 than on the shortest route to Bloomington.
How about the safety of Evansville area students attending the many schools in Vincennes, Terre Haute and Lafayette? Also, many people from those northern areas attend the universities here in Evansville. So, many more students travel U.S. 41 than the roads to Bloomington. It's obvious to me that proponents of the new terrain highway are using student safety as another of many excuses for their self-centered goals. 2.3.1

Other problems:

1. There is a limit to how much infrastructure we can maintain. For years I've heard news reports concerning the difficulties of maintaining the roads and bridges we already have. I'm sure it has not escaped your notice that a new I-69 will cost much more than the expense of its construction. If a new road is built, we and our descendants will then have two roads to maintain, not just U.S. 41. I'm not speaking only of surface and shoulder repairs, not just of erosion control, not just of the bridge inspections, repairs and replacements. All the new roadsides will need mowing in the summer and snow and ice removal in the winter. The costs of operating and maintaining those machines, the tools and equipment needed to maintain them, the storage of all this machinery, the wages, salaries and benefits of all the new government workers will be enormous expenses. **(There are too many government workers already!)** 3.4.6
Future generations will continue to pay these costs - forever.
2. What Indiana has done to the environment is a crying shame. Generally, all that business people know about nature is hitting a little white ball around a manicured lawn. They don't know about environmental issues and don't have the time or the inclination to learn or even be concerned.
3. US 41 needs to be improved so it can be a better route to both Indianapolis and Chicago. 2.3.1
4. **The new terrain effort would not have gotten anywhere, were it not for the influence of wealthy powers. "The only people the politicians in Washington [or Indianapolis] see are the ones with enough money to make the trip." -as quoted by a National Geographic book.**

To sum it up:

Who pays for new terrain I-69 and who profits from it? Businessmen and politicians are acting in their own, immediate self interests. They don't care about the Amish farmers, contemporary farmers, businesses on U.S. 41, people living in the U.S. 41 area, safety of a greater number of people, tax payers (two roads, more costs) or the environment!

John Hendricks

1001-009

To: Mike Grovak
Bernardin, Lochmuller & Assoc., Inc.
6200 Vogel Rd.
Evansville, IN 47715

Subj:	I-69
Date:	10/10/02 3:11:25 AM Eastern Standard Time
From:	Carplake
To:	carr@carri69.org

If U.S. 41 is upgraded to interstate standards between Evansville and Terre Haute it will not only reduce travel time from Evansville to Indianapolis, but it will also reduce travel time from Evansville to the Gary-Hammond area by at least 20 or 30 minutes. I believe that the reduced travel time from the southwest to the northwest part of the State is another very good reason to use the U.S. 41 - I-70 route for I-69, but I have not seen anything about this advantage in any news announcements. I have sent comments on this advantage to the INDOT comment line and to the *Indianapolis Star*. You may want to make this arguement to INDOT and Evansville area groups and officials if you have not already done so. Improved access to the Gary-Hammond area and Chicago would be a big economic advantage for the Evansville area. 2.3.1

Robert Threlkeld, 11256 Wood Creek Dr.
Carmel, Indiana 46033

1010-006

Saturday, January 03, 1998 America Online: Carplake

City of Bloomington
Office of the Common Council

The Honorable Governor Frank O'Bannon
State House – Room 206
Indianapolis, IN 46204-2797

Dear Governor O'Bannon,

We, the undersigned majority of the Bloomington Common Council, respectfully submit to you and INDOT this statement concerning the proposed I-69 highway routes described in the current Draft Environmental Impact Statement (DEIS).

In December of 1999, the Bloomington Common Council passed a Declaration opposing any routing of I-69 through our City. A copy of the Declaration is attached. A majority of the current City Council supports that Declaration and has further concerns regarding the routes identified as "preferred alternatives" in the DEIS.

The 1999 Declaration summarizes why we believe that routing I-69 through Bloomington will harm our community. The new DEIS provides details of negative impacts that the City Council did not know in 1999. Examples include the widening of the corridor to 8 lanes in our city to accommodate very large traffic increases, and the taking of numerous homes, churches, and local businesses like the Oliver Winery, which the DEIS notes, "...would be very difficult to find a replacement site for..." 5.3

For decades Bloomington has experienced population and economic growth above the state average and above that of other similar-sized Indiana cities like Marion, Anderson, Muncie, and Terre Haute – all located on interstate highways. Indiana ranks 4th in the nation in miles of non-urban interstate highway per square mile, yet for many years has experienced among the lowest personal income growth and highest job loss rates of any state. Lack of interstate miles does not appear to be the problem, nor will construction of additional miles be the solution.

Even transportation dependent businesses are successful in Bloomington. The existing road network provides Bloomington with the competitive transportation costs and reliability of service that we need in order to prosper. Rather than a major interstate highway, Bloomington needs better management of the State Road 37 corridor. We ask that INDOT continue with intersection improvements on SR 37, and that new road cuts directly onto SR 37 be prohibited. Frontage access roads are needed to preserve SR 37 as a safe, efficient connection to Indianapolis. Appropriate, fiscally responsible improvements to SR 37 and other area highways will help the region more than a major interstate highway. 2.3.1

Bloomington thrives because people want to live, work, raise families, and build businesses here. As the Declaration explains, Bloomington offers a high, special quality of life that I-69 threatens to diminish.

1101-022

401 N. Morton Street • Bloomington, IN 47404 City Hall Phone: (812) 349-3409 • Fax: (812) 349-3
www.city.bloomington.in.us

INDOT Commissioner J. Bryan Nicol said the state will choose an I-69 route that is "...best for the State of Indiana as a whole." Since I-69 will be built primarily with Indiana's annual allocation of federal gas tax revenues, not with special federal funds, we agree it is vitally important for the I-69 decision to reflect what is best for all of Indiana.

Each dollar spent on I-69 is a dollar that would otherwise go to another needed project in Indiana, including other important projects in Southwest Indiana. The two Bloomington routes identified in the DEIS as preferred (3B and 3C) are the most expensive alternatives, with cost estimates nearly 90% (800 million) more than the least expensive route, Alternative 1, which is identified as "non-preferred." With the Crossroads 2000 program ending and further transportation cuts likely, there will be hundreds of millions of dollars less for Indiana highway projects even given the recent state gasoline tax increase. Therefore, it is critical that a fiscally responsible route be selected for the route for I-69.

Finally, the DEIS and the Federal Highway Administration estimate that construction of any route other than Alternative 1 would divert 30-40 percent of traffic from existing US 41, doing significant harm to the economies of Terre Haute and other Hoosier communities on that route. The US 41 counties already have many more unemployed people, more people in poverty, and equal or worse general economic conditions than the counties between Bloomington and Evansville on INDOT's "preferred" routes. We share the concern of our sister cities on US 41 that by diminishing their existing economies, the "preferred" I-69 routes harm communities that are already suffering. 5.5

According to the DEIS, in addition to being the least costly, Alternative 1 is the least destructive to Indiana's environment. We urge you to use your leadership and your office to select the route for I-69 that is fiscally responsible, conserves thousands of acres of farmland, forests, and wetlands, and thereby preserves those values that are close to all Hoosiers' hearts.

Sincerely,

Andy Ruff
Council Member At-Large

Anthony Pizzo
Council Member At-Large

Tim Mayer
Council Member At-Large

S. Patricia Cole
Council Member District 1

Jeffrey Willsey
Council Member District 4

Mike Diekhoff
Council Member District 3

Chris Gaal
Council Member District 6

cc: J. Bryan Nicol – Commissioner, Indiana Department of Transportation
Michael Grovak – Bernardin, Lochmueller, & Associates, Inc.

City of Bloomington
Office of the City Clerk
Regina Moore

October 4, 2002

I, Regina Moore, duly elected Clerk of the City of Bloomington, do hereby certify and affirm that the attached is a true and accurate copy of the Declaration of The City of Bloomington Common Council which was passed (5-3-1) by the Bloomington Common Council on December 1, 1999.

Regina Moore

Regina Moore, CLERK
City of Bloomington

(seal)

DECLARATION OF THE CITY OF BLOOMINGTON COMMON COUNCIL OPPOSING THE ROUTING OF INTERSTATE 69 THROUGH THE CITY.

401 N. Morton Street • Bloomington, IN 47404 City Hall Phone: (812) 349-3408 • Fax: (812) 349-3
www.city.bloomington.in.us
e-mail: clerk@city.bloomington.in.us

DECLARATION OF THE CITY OF BLOOMINGTON COMMON COUNCIL OPPOSING THE ROUTING OF INTERSTATE 69 THROUGH THE CITY

WHEREAS, extension of Interstate Route 69 through southwest Indiana is now being considered, and various possible routes are being evaluated; and

WHEREAS, aligning this route along a portion of existing State Road 37 would run I-69 through the incorporated City of Bloomington; and

WHEREAS, construction of a wide, controlled access road through Bloomington would harm our community by disrupting transportation links, exacerbating a feeling of economic and cultural division and necessitating an expensive duplication of physical and emergency services; and 5.5

WHEREAS, increased commercial development where an interstate passes through an existing community would likely lead to urban sprawl, violating the goals of Bloomington's Growth Policies Plan, and would threaten the economic survival of existing businesses and the revitalization of our downtown; and

WHEREAS, once completed, I-69 would serve as a major international transportation route channeling greatly increased truck and automobile traffic through Bloomington and significantly adding to the air, water and noise pollution experienced by our community; and

WHEREAS, as an international interstate, I-69 would serve as a major route for transporting hazardous materials which in a karst environment such as ours increases the likelihood of serious contamination from hazardous material spills; and

WHEREAS, increased numbers and anonymity of people passing through Bloomington, and more direct linkage to areas of higher criminal and drug activity will likely expose our community to increases in such activity, endangering our citizens and requiring increased expenses on law enforcement; and

WHEREAS, contact between high-speed interstate traffic and local vehicular and pedestrian traffic at intersections and on local roads would increase the danger to our citizens from traffic accidents and would require increased local expenditures on roads and traffic control; and

WHEREAS, placement on an Interstate would negatively impact Bloomington's quality of life and its economically valuable image as a safe, quiet and culturally unique small town, which has made it a popular retirement community and attractive to many businesses;

NOW, THEREFORE, BE IT HEREBY DECLARED BY THE COMMON COUNCIL OF THE CITY OF BLOOMINGTON, MONROE COUNTY, INDIANA, THAT:

SECTION 1. The Council concludes that it would be in the best interests of the people of Bloomington were any extension of Interstate 69 not routed through our community, and that the Council urges all relevant elected officials and state and national agencies to take this into consideration when studying and selecting proposed routes.

PASSED AND ADOPTED by the Common Council of the City of Bloomington, Monroe County, Indiana, upon this 1ST day of December, 1999.

TIMOTHY MAYER, President
Bloomington Common Council

ATTEST:

I-69 Public Hearings

Draft Environmental Impact Statement
August 19 - 21, 2002

I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

I am very concerned (if the proposal goes through) and the highway is constructed, our taxes will rise astronomically each year to pay for a highway we do not want or need. I feel it is so unnecessary to rape the beautiful farmland and forests to create a highway that will eventually be used to send more of our factory jobs to Mexico! 3.4.6

I am also concerned about the 4,475 bridges we have in Indiana now that are deficient. If we use the allotted funds we get to maintain our existing roads and bridges to build this proposed new-terrain I-69 highway, how safe is it going to be for us to drive in this state? 2.3.1

I understand if the I-69 highway is approved there will be many county roads closed. This raises many concerns for everyone who opposes this proposal such as getting fire, police and emergency assistance as quickly as we need it. Also the school children will be riding their buses for extended periods of time. 5.3

We are totally opposed to this new-terrain I-69 highway!

RECEIVED
OCT - 3 2002
BLA

Name Michael and Erma Kathy Hedrick Erma K. Hedrick Michael Hedrick

Address Rural Route #1 Box 114

City/State/Zip Solsberry, Indiana 47459

1003-009

1025-036

Indiana Dept. of Transportation
100 N. Senate Ave.
Room N855
Indianapolis, IN 46204-2218

10/25/02

INDOT:

These are comments on the DEIS for I-69 between Evansville and Indianapolis.

If one of the Alternatives must be chosen, then I support Alternative 1, the 41-70 route. This route is considerably less expensive and has the smallest adverse environmental impact.

The advantages of the other Alternatives are not commensurate with their faults. The fastest preferred Alternative is only 17 minutes quicker than Alternative 1, but its cost is 0.8 billion dollars more. The destruction of the environment and of farmland caused by Alternatives other than #1 is unconscionable. If the extra truck travel time is a serious issue, then railroads should be supported instead of highways, as rail is a far more efficient means of transporting freight. 2.3.1

For 2½ years I attended I U at Bloomington and drove back to Evansville nearly every weekend. The roads were quite adequate and not heavily traveled. There is definitely no need for a superhighway linking Bloomington to Evansville. Highway 41 is much more heavily traveled than highway 57, so it seems more reasonable to improve 41.

Quality wetlands aren't built by man in a short time but take centuries to become healthy ecosystems. Therefore, mitigation of wetlands destroyed by highway construction will almost certainly be inadequate. Most of the wetlands 7.1

in Indiana have already been destroyed, so it is important to protect the few that remain. Forests should be protected for the same reasons. Without a robust natural environment man can not prosper, as shown by the fate of Easter Island long ago and of Haiti today.

Farmland should not be destroyed by the highway since it is very important that food be grown locally. It is not wise that so much food is imported which could be grown here.

Development along whatever route the highway takes will probably be much greater than that declared in the DEIS. With the growth of businesses near the highway will come an increase in population which will result in expanding suburbs, shopping centers etc. Often the new suburbs will spring up 10-20 miles from where the people work, and have witnessed in Wadesville, IN (near Evansville) and in Sunman, IN (near Cincinnati). The resulting destruction of the natural environment and of farmland is considerable and seems to accelerate rather than stabilize.

It is imperative that an already developed route (41-70) be used.

Sincerely,
Rick Kiechle
Rick Kiechle
7229 Highway 66
Wadesville, IN 47638

Subj: DEIS comments
Date: 11/7/02 9:20:52 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Gregory
LastName = Travis
StreetAddress = 2570 Fluck Mill Rd
Address =
City = Bloomington
State = IN
ZipCode = 47403
Email = greg@assmotax.org
Comments = There are only three states in the nation with more rural interstate per square mile than Indiana.

* The counties through which I-64 passes in southern Indiana consistently lead the state in unemployment rates and depressed income.
* The National Broadcasting Company (NBC), owned by the General Electric corporation, called new-terrain I-69 through Indiana a "Fleecing of America"
*

For the past fifty years Bloomington has been the fastest-growing urban area in Indiana
*

The Bloomington Metropolitan Statistical Area (MSA) is the fourth-fastest growing in Indiana (1990-2000). The Bloomington MSA is growing faster than New Albany, Fort Wayne, Evansville, South Bend, Gary, Terre Haute, and Muncie, all cities served by interstate highways.
*

Monroe County already has more jobs than people. Over 15,000 people come into Monroe County every day to work.
* Indianapolis already has more interstate connections than any other city in the United States.
*

Indiana taxpayers, not the federal government, will pay the $2 billion construction cost of I-69. Senator Richard Lugar: The bulk of the federal highway funds required to construct the Southwest Indiana Highway will likely come from Indiana's annual allocation of transportation funds distributed by the U.S. Department of Transportation according to the formula specified in the TEA 21 law. This money comes from Indiana's gas tax and will come at the expense of Indiana's existing roads. No wonder local highway and street departments are wondering if a new I-69 extension will leave them hanging in future INDOT budgets. -- Lafayette Journal and Courier
*

Based on the results of the benefit to cost evaluation, construction is not recommended -- Southwest Indiana Highway Feasibility (Donohoe) Study, comissioned by Evan Bayh, 1990
*

Based on [an] analysis of direct highway benefits and the likely indirect benefits of economic development, the proposed highway is at best marginal from a cost effectiveness standpoint. -- Federal Highway Administration report to Congress, 1990

* There are only five counties in southwestern Indiana through which at least one four-lane divided highway doesn't already pass
* The US-41/I-70 option costs half as much as the preferred "new terrain" option and has the lowest farm, forest, and wetland impacts of any other option. Yet it is listed as "non-preferred" because it adds thirteen minutes to an Evansville to Indianapolis drive.
* Truck freight costs you time and money while polluting your air. It makes no sense to subsidize more of it. Transportation Consultant Wendell Cox calculated that if Indianapolis shifted just a quarter of its freight from truck to rail that it would save each commuter a week's worth of time in traffic congestion. Every year! 2.3.1
*

There is no correlation between job retention or expansion and a state's level of interstate infrastructure. Click here to see a graph 2.3.2
*

Indiana Republican Senator Richard Lugar's family farm is one of hundreds that could be destroyed by I-69 (for what?). The Indianapolis Star quotes the Senator saying I believe that this would be a tragic public policy and environmental error, and this is why I pose the issue in such stark and unmistakable terms to help provide very public and timely debate. Read Senator Lugar's letter to Brian Nicol HERE.

Gregory Travis for
The Association of Monroe County Taxpayers
www.assmotax.org/I69/I69.php

1107-278 Travis, Gregory.wpd

Subj: DEIS comments
Date: 11/7/02 9:22:28 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Gregory
LastName = Travis
StreetAddress = 2570 Fluck Mill Rd
Address =
City = Bloomington
State = IN
ZipCode = 47403
Email = greg@assmotax.org
Comments = Indiana's Department of Transportation (INDOT) just released their draft environmental impact study regarding the I-69 highway. The elimination of the least-costly and least-damaging route along with the emphasis on the original route telegraphs only a single conclusion: Despite the millions spent on consultants, despite the overwhelming outpouring of public opposition, I-69 will barrel through Monroe County along the same alignment ("3C") first proposed a decade ago. That alignment will take it down SR37 to Victor Pike, along Victor Pike to Tramway Rd., and then westward to Greene county. In the process, it will destroy one of the last remaining and most beautiful rural areas in the county, potentially devastate the limestone industry, and cut western Monroe County from eastern Monroe County.

Progressive areas of our nation from California (which is dismantling parts of its urban interstate infrastructure) to Maryland (which has placed a moratorium on urban interstate building) have faced the reality: we are in a period of rapidly diminishing returns from highway building in the United States. Unfortunately, Indiana is determined to live up to its growing reputation as the "Mississippi of the North" by promoting exactly that which other communities have discovered is harmful to their economic health.

Perhaps a new slogan is in order: Indiana, out of the gate thirty years too late.

The Bloomington Herald-Times recently published an editorial arguing the economic benefits of bringing I-69 through Bloomington and Monroe County. In the spirit of debate, we would like to provide an alternate view of those benefits and demonstrate how I-69 is not likely to provide them or is ill-suited for those goals.

Building a Life Sciences Corridor

We agree that an important part of Indiana's economic future involves supporting and building on its biomedical assets but it's a stretch to think that a truck highway is integral to that goal. The products of Life Sciences are patient records, research reports, genetic data, etc. Products which require information, not truck, highways. Employers and employees in the life sciences value environmental, social, and civic amenities over industrial infrastructure. If we are to attract the highly-educated and highly-compensated individuals who form the core of life science research and development then we must make a concerted effort to preserve those qualities of life. 2.3.2

Connecting Crane

The H-T editorial argues that the twenty trucks which service Crane daily are ample justification for I-69 even though this represents just 0.2% of all the trucks expected to transit I-69 every day. A better solution is to recognize that Crane's physical product, military ordnance, is more safely and economically carried by its existing rail infrastructure (which connects to all important national military installations) while its knowledge products are best carried by fiber-optic data cables. 2.3.1

Free Trade is here to stay / Business want to locate near Interstates / Efficiency is critical

We've lumped these three arguments together because they're all restatements of the same point. First, yes free trade is here to stay and when I-69 is viewed as a national "free trade corridor," instead of just a Bloomington to Evansville convenience, then the arguments against the US-41/I-70 route evaporate. For the nation it will be cheaper, more efficient, and less damaging to the environment to connect Canada and Mexico via US-41/I-70.

Second, labor costs overwhelmingly outrank infrastructure when it comes to location choices made by multi-national corporations. Toyota did not locate in southern Indiana due to its proximity to I-64 any more than RCA relocated to Mexico because of its excellent limited-access truck highways. Toyota came here because labor and land in Indiana are cheaper than they are in Japan. A far more effective industrial economic policy for Indiana involves encouraging corporations located in high-wage nations (particularly those in Western Europe) to relocate factories to our medium-wage nation. Two billion dollars would fund a robust State Economic Development Corporation.

Third, Indiana is fourth in the nation in rural interstate density, behind only Vermont, Illinois, and Pennsylvania. All business owners and economists understand the concept of diminishing returns. We have twice as much interstate, per square mile, as does California. How much more do we need to build before we catch up to that economic powerhouse?

Southwestern Indiana needs help

There are only five counties, home to 40,000 families, in southwestern Indiana that are not currently served by a four-lane divided highway. If those who espouse the rhetoric of helping Indiana's southwestern poor are serious, they will support investing the two billion dollars of Indiana taxpayer's money into social, not corporate, welfare. The cost of I-69 invested in a conservative trust fund will yield over $2500 per southwestern Indiana family, per year, forever.

Those funds can be used to help families relocate to adjacent counties, obtain additional education, start a business, etc. all without the environmental and social disruption of yet another truck highway.

The bottom line

The bottom line is that, like virtually all highway projects, I-69 is a political objective that sometimes masquerades as a job objective, sometimes as an economic objective, and sometimes as a transportation objective. The fact that its proponents are unable to name the concrete advantages of more government investment in interstate infrastructure, in a state that already leads the nation in such infrastructure, should set off warning bells in the homes of all Indiana taxpayers.

Indiana cannot move forward by looking to yesterday's solutions for tomorrow's challenges. It is time to invest not in more outdated road technology but in digital information infrastructure as well as more efficient and less costly methods of moving goods. Indiana needs now an infrastructure that prepares it for the knowledge and service economy of the future while reducing our dependence on foreign oil, improving our natural environment, reducing pollution, and delivering job improvement in quality, not quantity.

The bottom line is that the "no-build" option is the cheapest and least damaging option for Indiana.

Gregory Travis for
The Association of Monroe County Taxpayers
http://www.assmotax.org/I69/I69.php

1107-281 Travis, Gregory.wpd

Subj: DEIS Comments
Date: 8/21/02 11:54:48 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Susan Waggoner
Address = RR 5 Box 387
City = Loogootee
State = IN
ZIP = 47553
Email = waggoner_sue@crane.navy.mil
Message = I very strongly recommend that I-69 be built and that it connect Indianapolis and Evansville through one of the routes going through Washington. We desperately need better transportation alternatives in this part of the state.

I strongly believe that I-69 will bring a better economic scenario to Southwest Indiana. Very many local people in this area barely survive on jobs that are minimum wage or only slightly better because they have no other job alternatives in this area. Many others move elsewhere to get a better job, but that does not improve the economic area they left. I've read several newspaper articles over the years that state that companies have looked into settling in this area but ultimately moved elsewhere due to poor highway connections.

If NSWC Crane would end up being closed, the southwest quarter of the state would be tremendously impacted. If I-69 is built nearby, it would lessen the chance of closure considerably. The Interstate system was built after Eisenhower saw the benefits of the equivalent German highway system. The US Interstate system was justified as a means to enhance military readiness and transportation. Therefore, let's use I-69 for the nation's original purpose and enhance the readiness and transportation of NSWC Crane.

For instance, a great deal of military explosives and hardware must travel directly through residential and business areas south of Crane. The safety of all people in this area would be greatly enhanced if the trucks could stay away from local traffic. 2.3.1

Face it, most transportation takes place over interstate highways. The state highways and the US Highway system are not much more than upgraded local roads anymore, yet that is all that southwest Indiana has. Southwest Indiana is often thought of as bounded by I-70, US 41, I-64, and SR 37 because these are the only long-distance 4-lane highways in this area, except for a few four-lane streets through towns. US 50 was recently four-laned from Vincennes through Washington, but that took many years to complete. The effort was very much needed, but it really is more of a highway spur to US 41 than a true long-distance highway.

It's true that a significant fraction of the local population sees no need for this highway. But consider this: They are located primarily around Bloomington, which has a very good connection via SR37 to Indianapolis. Many of those people moved to the area after the early 1970s, when SR 37 was completed. They have no memory of what it was like to take what is now a "scenic" route via old 37 to Indianapolis.

I drive SR 45 between the Odon area and Bloomington quite frequently. I was nearly killed in a one-car accident where my car skidded on a rain-slick stretch just north of Eastern Heights in 1988. I have seen the aftermath of many, many accidents, especially those due to bad weather. I know the safety hazards associated with this area and it's disgusting that it's taking so long for the government to upgrade the transportation system into an interstate version.

Please don't let a minority of rude, loudmouthed, ex-hippies control our future. If they don't want the interstate around Bloomington, then fine -- build it through Owen County. Eventually, they'll see the light and then want a spur built to the interstate, eventually costing far more.

Speaking of spurs, please consider linking the local towns to I-69 via upgraded highways or spurs. I recommend I-69 go through the Washington area and in addition, spurs be linked to Princeton and Jasper. Loogootee and Bedford should connect to I-69 via an upgraded US 50, and Linton and Bloomfield via an upgraded SR 54 or a spur.

As far as the Amish are concerned, just build a few more overpasses over Daviess County roads and perhaps a frontage road. Many of the Amish have found that they can no longer support a family by farming. Quite a few now commute via vehicles owned by Mennonites and other non-Amish to construction job sites in Bloomington, Indianapolis, and Evansville. In addition, several businesses employing the Amish (like Graber Post, Daviess County Metals, and K&K Trusses) do quite a lot of business in adjoining states. Before long, they'll also decide that a better transportation system is in their interest as well.

True, a fair amount of farm land will have to be purchased for the interstate. Keep in mind, however, that in these days those people who farm for a living often rent farmland or farm on shares (splitting the expenses and profits with the landowner). Those who farm for a living are generally 50 or older. As they retire, fewer farmers will be around to farm that acreage. I predict that those who farm for a living will still be able to find the 2000 or so acres they need despite the amount of land taken for the interstate.

The people with the greatest input should be those whose homes or businesses would be displaced. I would think that the people advocating the I-70/US 41 route should be concerned about the vastly greater numbers of homes and busineses that route would displace compared to those affected by a route going through Washington.

In conclusion, I strongly recommend that I-69 be extended from Indianapolis to Evansville, go through the Washington area, and either pass nearby NSWC Crane or create a spur to Crane.

0821-067 Waggoner, Susan.wpd

Subj: DEIS comments
Date: 11/7/02 6:35:07 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Linda
LastName = Richardson
StreetAddress = 7811 North Thames Drive
Address =
City = Bloomington
State = IN
ZipCode = 47408
Email = mlrichardson@bluemarble.net
Comments = Dear Sirs:

I would like to voice my opposition to the I-69 highway following the route of State Road 37 through Bloomington, Indiana. I live in the Windsor Private neighborhood, north of Bloomington, and adjacent to the Oliver Winery. It is my understanding that if I-69 were to follow State Road 37, my home and Oliver Winery might be acquired by the State of Indiana. The only access to our neighborhood, and the winery, is Winery Road off State Road 37. That access road would be lost to the new interstate route.

POINT
Twenty-five years ago I lived in Anderson, Indiana. I-69 did nothing to stop General Motors from selling or closing manufacturing plants in the area. Teachers in the local school system were laid off, and many families were forced to move out of town. My parents' rural home sold for half its appraised value. There was no one to buy their home, or the homes of dozens of former GM employees. Ask Madison and Delaware County residents, if I-69 has helped them retain local industry to any great extent.

My father took early retirement twenty years ago, so that the jobs of younger men and women could be saved. In the end, it didn't help. Six members of my immediate family were forced to find employment outside Madison County. I-69 did not provide new jobs with living wages.

POINT
I-69 is designed to help trade nationally and internationally. The quality of life would not be raised much for southern Indiana's residents. People cannot subsist on the income from minimum wage jobs. | 3.4.4

POINT
Interstates are not safer, nor do they save much time. On Saturday, November 2, my husband and I drove to the north side of Indianapolis using SR 37 and the interstate. Three different times, on the interstate, we were stopped for a minimum of 10 minutes per stop. With daily commutes, we find no time savings. We choose to drive long distances, because our quality of life is so much better in Bloomington than what we experienced while living in Indianapolis. That is, in large part, due to the beautiful terrain of the region.

POINT
Why should the State of Indiana, and its residents, pay for a new-terrain highway when there are other options in Indiana and neighboring states? This is a national concern and should be treated as such.

I-69 will also take funds away from upgrading Indiana's rural highways. SR 45 and SR 48 are only two examples of highways, which could use attention. This is strictly a political decision with little merit for the residents of southern Indiana.

POINT
In twenty years, an interstate for national or international use will probably be considered a dinosaur. We need to focus on high-speed rail travel, or other methods of transportation. By the time the interstate is built, it will be inadequate. There must be a better way. | 2.3.1

POINT
Indiana cannot afford to build an interstate without financing a section at a time. I have seen numerous highways around the country that go nowhere. They were part of greater schemes that were abandoned for lack of funds.

POINT
After the route determination is made, landowners in the chosen path of I-69 will not be able to sell their homes and farms. All of those affected will be in limbo for many years to come. I-69 will not be built overnight, and it is a travesty to think it will benefit anyone locally. It will not. | 5.3

This is the third time that an interstate has invaded my life. I moved to Bloomington to enjoy the green spaces, and to live near a rural highway. My husband is a scientist with Eli Lilly, and he drives to Indianapolis everyday. My daughter goes to school in Indianapolis. An interstate would not save them time in their commutes.

If our house is condemned, or acquired, we would be forced to file bankruptcy. I have never heard of the state paying fair market value for property purchased. | 5.3

Please do not build an interstate with Indiana's highway funds without considering the long-term effects on the residents of Indiana and southern Indiana's habitat. If an interstate must be built, use the SR41-I70 corridor. I70 near Indianapolis must be upgraded anyway with the expansion of the Indianapolis International Airport.

Also, the federal government has stated, in the past, that they will not provide additional funds for I69 endeavor. The state of Indiana cannot afford to devote funds to a project of this magnitude.

All of your concerns listed in this week's newspaper are weak, and with little merit. Please be honest with Indiana's residents. The I69 expansion will help nationally and internationally, but not locally.

Sincerely,

Linda Cheetham Richardson

1107-201 Richarson, Linda.wpd

Subj: New I-69 Study Form Feedback
Date: 8/1/02 8:11:09 PM EST
From: tomeh1@aol.com (Thomas Himsel)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Thomas Himsel
2177 Willow Lake Drive
Greenwood, IN 46143-9323

Message:
My complements to the commission. The Terre Haute route was never a good one. It doesn't give enough people access to the highway and the 37/57 route will give opportunity to help the economice of many more cities. Our third largest cith should be connected with the state capitol by the most direct route. Evansville is the largest city in the country that doesn't have a direct corridor with it's state capitol. | 2.3.1
I support and favor the 37/57 route. Make it happen for the best benefit to the tax payers and the businesses in central Indiana. The Vincennes option should be rulled out too. Bloomington should get an interstate highway due to the college traffic and business's along that route. You need to consider ths people in central Indiana who will benefit from a better highway and they deserve one too! Again good job so far!

0801-026 Himsel, Thomas.wpd

Subj: DEIS Comments
Date: 8/22/02 7:26:45 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Shawn Nigg
Address = 3159 E Covenanter Dr
City = Bloomington
State = IN
ZIP = 47401
Email = shawno@alumni.nd.edu
Message = Having grown up in Jasper and attended college in both Bloomington and South Bend, I have traveled the routes which currently lie in the path of the proposed new terrain I-69 many times. I have often enjoyed driving along those rural roads and viewing the majestic scenery which lines those roadways. It truly is special. Unfortunately, it is some of the man-made scenery that I have seen which troubles me to this day. What I refer to is not a house or a gas station or a restaurant, but rather a number of tiny crosses that dot those roadways. These are not advertisements for a nearby church but rather reminders of tragedies which have befallen people who have driven those roads. Each cross represents a memory of a loved one, a reminder to those who travel those roads that danger lurks where one least expects it. I often wonder who these people were who were killed while driving these roads. Were they my age? Did they have a family? Was it someone's son or daughter who was on their way to college? I probably will never know the answer to these questions. However, there is one thing of which I am absolutely certain. If the new terrain highway saves just one person's life, it has more than paid for any cost differential between it and other routes. I implore you to choose one of the new terrain routes. One can always plant more trees. A loved one can never be replaced. 2.3.1

0822-089 Nigg, Shawn.wpd

Subj: DEIS comments
Date: 11/7/02 5:00:03 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Tracy
LastName = Branam
StreetAddress = R.R. 1 Box 78
Address =
City = Solsberry
State = IN
ZipCode = 47459
Email = tbranam@indiana.edu
Comments = To: J. Bryan Nicol
Indiana Department of Transportation

Michael Grovak
Bernardin, Lochmueller & Associates
From: Tracy Branam
Research Scientist

Subject: Comments on the I-69 Draft Environmental Impact Study
General Comments

Indianapolis Star, October 3, 2002: "We are relying on our study for this decision to make sure that we don't weigh any one person's opinion over another's, but rather rely on the facts." -- Jessica Stevens, INDOT spokeswoman when responding to Representative Julia Carson's support of the US41/I-70 alternative.

What's interesting about this comment is that it is referring to two somewhat different sources as being relied upon for the decision-making process. On one hand you have the "study", on the other, the "facts". They are not the same. Facts are the measurable parameters, the actual data of all the various tangibles that can and will be affected by the construction of a new interstate. They are included in some sections of the report, especially when tabulating the amount of land impacted and the categories of the different land usage types. However, the economic impacts in the study are based on putting these facts into models and projecting probabilities, which are only as reliable as the model from which they are generated. Facts can be misused in such a situation, either by being omitted, misrepresented, incorrectly weighted, or incompletely compiled. There is no perfect way but the best way to evaluate the performance of a model is to test it on a known system, in this case an existing interstate. It would be interesting to include some validation of the accuracy of the models used to predict various performance criteria such as travel impacts, economic impacts, environmental impacts, and all of the other categories for which the various models were employed. Have you tested these on an existing interstate such as I-70 or I-65, using historical data (facts) from the same agencies you acquired current information from? If costs were an inhibiting factor to doing this exercise, then I strongly suggest you consider the fact that your decision-making process must be flawed if you are using models with limitations you have not determined. If the models employed for this study have already been tested by other researchers, then the EIS should include a reference to previous performances so the readers can see for themselves how accurately the models perform. I believe this would go far in reducing the debate on the prospective benefits of a new interstate.

Specifics
There are two core goals on the state level and one on the federal level. The federal core goal is to link Canada to Mexico via an interstate corridor. There are currently at least four main ways to get from Canada to Texas starting at I-69 using the existing interstate system. All pass through Indianapolis. Two would currently terminate at Dallas or San Antonio, the other two in Houston. The only leg missing is the Texas to Mexico route. This would cost the taxpayers a whole lot less to build. Why do we need another complete route? The time savings cannot be that great and besides if we are trying to make money from the trade between these two countries wouldn't it be to our advantage to have their couriers spend more time on our roads paying more for our gas, providing us more federal and state tax money in the process? 3.4.5

The state core objectives: improve transportation corridors between Indianapolis and Evansville, and improve personal accessibility for southwestern Indiana residents do not require a new interstate to be achieved. There are other alternatives besides the do-nothing alternative that can accomplish these. Why were other, non-Interstate improvements not considered?

Although the DEIS is quite extensive and shows a tremendous amount of work, there are many places where the models that have been used do not seem to coincide with the actual conditions. As mentioned above it seems there are some flaws in the data that was used to generate this report. Below are some examples of weaknesses that I have found in the models and their interpretation.

The needs assessment of the no-build condition has an illustration showing the accessibility to employment. The model used to generate this figure is apparently flawed as the map has the Floyd County area as ranking low on the accessibility to employment scale; a situation that apparently ignores the interstate access in that county and the ease of access to the large Louisville metropolitan area. 2.3.1

Under the safety category there needs to be a more detailed breakdown of the traffic accident statistics such as the actual numbers and the type of accident, i.e., truck, at an interchange, drunk driver, joy-riding teenagers, etc. It is important to know what types and how many accidents are occurring because interstates will have no effect on some. Joy-riding teenagers will be involved on non-interstate roads regardless of whether there is one or not. The significant data is the truck-related accidents, these an interstate may or may not alleviate. 2.3.1

"Economically-stressed counties" is a somewhat subjective and philosophical term. Are people economically stressed in rural counties primarily because there are no employment opportunities or is it because marginally-employable people are attracted to these environments because of the lower cost of living, which is a function of, among other things, lower property taxes, fewer restrictions on living quarters, and less social service monitoring and interference? This gets into the realm of intangibles and should not be viewed with a broad brush stroke as everyone needs more development to improve their lifestyle. Some actually don't want it. Many people flee more developed areas because of their inability to secure high-paying jobs prevents them from living in urban counties with many services, all subject to higher taxes and user fees.

Travel Impacts:

Does the new, improved travel impact model discussed in this section include the re-routed daily local traffic loadings that would have to travel further to crossing points as local roads are closed? It may not seem like much of an impact for one small area, but when viewed throughout the length of the corridor, this will not only have an impact on local traffic but affect the energy impact as well.

Environmental Impacts:

One of my greatest concerns with environmental impact studies is that there is absolutely no way to quantify the cost of environmental loss due to the construction of an interstate. How can you determine which is the most viable option when you have no way of quantifying the loss of certain environment types when compared to potential economic gains. No one has been able to come up with a model to quantify what the loss of natural environment has on current human physical and mental health, and the future health of the human race. This is another intangible. It cannot be quantified and therefore is always outside the scope of predictions. It is very dangerous to ignore the consequences of dicing up the natural resources of the earth and assume that each time you are only consuming a small part of the environment. This comes under the category of irreversible and irretrievable commitment of resources. The only quantification you provide is the amount of acreage of the various natural environments that will be consumed. What is the impact of consuming these environments on humankind and our ability to continue to maintain a healthy environment?
The DEIS also has some serious flaws in the amount and kinds of land to be consumed or impacted. The Indiana Geological Survey provided data on the geological information of the study area. Seeps and springs data was provided by the US Geological Survey. Both sets of data are incomplete and not representative of the new terrain routes. Comments from others (e.g. G. Milhoan) have provided you documented evidence of the incompleteness of karst features and springs in Eastern Greene County and Western Monroe County. The reason these data sets were incomplete is that most of the new discoveries occurred on the private property of landowners that, until recently discovering they lie in the path of a new road, would not allow access to their property for fear of liability and unwanted attention and traffic. 5.23

This is by no way a complete review of the impressively lengthy and information-rich document. I have scanned the various categories and have noticed a trend concerning how the information is presented. Detrimental impacts such as habitat loss, noise levels, residential and business dislocations are pretty much measured parameters, whereas economic gains are modeled projections. On one hand there is a definite known loss, on the other only a guessed-at gain. The big picture question is this: how do you determine when definite negative impacts outweigh possible, yet unknown gains?

Other questions concerning the validity of the tier 1 EIS are:
1) How legitimate is it to decide on a preferred route before doing a tier 2 study knowing that there are flaws in the models used and that the data set is incomplete? This of course assumes that you have recognized the limitations of the models being used to forecast the upside of building an interstate.
2) Assuming you go ahead and choose a route for a tier 2 study, if it contributes new data that either increases the cost of construction or indicates a greater environmental impact than the tier 1 study indicated (or probably both), will you push ahead or reconsider the chosen route?
3) How will you address inconsistent statements by the consulting firm (BLA) hired to do the EIS? [Specifically the comment that existing data was field checked when in fact no land owner in the Eastern Greene County area was contacted for access to their land to verify or check on the natural features on their lands.] 4.1
4) How does the existence of federally-endangered species affect the chosen route if additional populations and habitat are found during the tier 2 study?
5) How important is it to avoid karst terrain?
6) Were private wells included in the water quality impact evaluation? 5.24
7) The study mentions a more detailed field analysis for the tier 2 study in the ecosystem impact section (and some of the others as well). If highly sensitive areas and habitats are discovered in the chosen route for the tier 2 study, does this mean the route goes to the not preferred pile and a first runner-up chosen or will there be an attempt to alter the route somewhat?

Thank you for allowing me to comment on and question the DEIS. My comments in no way are meant to belittle the work that your staff has put into the project. I realize that you and your staff are only doing your jobs. I respectively request that you consider my comments and questions as they apply to the DEIS.

Thank You,
Tracy Branam
R.R.1 Box 78
Solsberry, IN 47459

1107-162 Branam, Tracy.wpd

Subj: New I-69 Study Form Feedback
Date: 11/7/02 5:04:35 PM EST
From: avhousecalls@yahoo.com (Ron Wells)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Ron Wells
P.O. Box 6421
Bloomington, IN

Message:
To whom it may concern,

I am a Bloomington resident. I am very much in favor of I-69 coming through Bloomington and Monroe County. I think it would be great for our local economy. I also think it would help Indiana University in recruiting students from southern Indiana, western Kentucky, and southern Illinois.

A lot has been made about a seventeen-minute time difference between routes. Those figures were calculated at interstate driving speeds and clear weather. What happens in foggy, snowy or icy conditions will be quite a different story. That time difference could increase four or five fold.

I used to live in Columbus. I worked as a manufacturer's representative. In this job I had to make business trips to Evansville. Although I had business trips that were longer in distance, that trip was the worst. After battling S.R. 46 I had to then fight my across Bloomington with all of it's east/west traffic problems which still exist today. Then I had to head south on to Evansville. Then I had to do it all again on my way home. I remember driving in horrible weather on those twisting narrow roads wondering why anyone would allow such a poor travel route in the age of interstate highways. If I didn't have business along the way, I often took U.S. 31, or S.R. 11 south out of Columbus to U.S. 50 just to avoid Bloomington. My point is that this decision affects many more people than those living in the counties where the roads will eventually lye. Anyone that travels a road is affected by its course and design. I believe that we should build the best road for everyone that will ever travel it. As any weary traveler will tell you, the best road is the shortest and the straightest road.

I think there is another very important issue involved here, the matter of access to sate government for the people of southern Indiana. This is a very important issue, and should not ignored. For many years the things that many of us have taken for granted have been out of reach for those in the Evansville area. Economically these people feel closer to Louisville or St, Louis than Indianapolis. 2.3.1

In closing, I think this highway ran straight from Evansville though Indianapolis, and on to Ft. Wayne will make Indiana, the mid-west region, and the United States stronger and more prosperous.

Thank you,

Ron Wells

1107-165 Wells, Ron.wpd

Marcia Abell... I'm Marcia Abell the County Clerk at Vanderburgh County. I'm here to speak on behalf of I-69 as a direct highway between Evansville and Indianapolis with access to Bloomington. An elected official from Bloomington stated he felt the construction of the new highway such as I-69 would have negative impact on the other highways projects in the other areas of the state would suffer. No one can make that prediction but if it happens I can only feel that it is now our turn. Southwestern Indiana has sent literally millions of dollars to the state only to see those monies spent in every area of the state except Evansville. It is our turn and there are those in other parts of the state that do not wish to see us have our fair share. Bloomington is a college town housing the state's main University. The children of Southwestern Indiana deserve to be able to travel to the state university on a descent highway. Our tax money helped to support that state school so we should certainly have access to it. IU has always been happy to accept the money we send there so they should likewise be happy and supportive of our efforts to have safe transportation for our children to go to school. Another individual commented that this highway would only benefit companies that have moved out side of the United States. It is ludicrous to think that no business in the US would benefit from this highway. Southwestern Indiana has a history of being a coal producing area but now the mines have closed and the coal industry is all but gone from our area. I worked for one of those major coal producers and can vividly remember the looks on the faces of the men and women as they were told their jobs had been eliminated, leaving an unemployed, highly qualified skilled labor force. The large numbers made replacement of these good salary jobs impossible. A major highway between Evansville and Indianapolis will bring jobs to our area. A highway does not guarantee the location of a new manufacturer in the area but the lack of one guarantees that it will not happen. However there are some guarantees the new highway brings, such as all aspects of both construction and real estate transactions, motels and hotels, gas stations and restaurants. 2.3.1

0821-184 Abell, Marcia.wpd

John Puccini... John Puccini, position surgeon, a member of the Chamber of Commerce the Transportation Committee, but speaking as an individual citizen as well. Practical Midwestern Hoosier logic and principals are provided by what I think INDOT's recommendations are for the direct or the shortest route between Evansville and Indianapolis. Because it is the healthiest, the least disruptive and the best fuel saving designation. As a physician I have a particular interest in the transportation of the critically ill patients. It would provide faster and safer service and transportation of emergency nurtured medical care patience who critical transport to IU Med Center to the various tertiary facilities in Indianapolis. This is a critical matter because people think that transport by land is old fashioned but quite frankly over 90 percent of the transported critically ill is by land not air. Safer highway connections between here and there and all intervening points that it would serve is logical and appropriate. It provides better access to the underserved portion of Indiana what I affectionately call the forgotten quadrant of Indiana we live in it. It's about time we have better access to safer travel, better accomplished. By eliminating 30 miles on a round trip compared to the taking the direct route as opposed to the indirect route Indianapolis from here to there you will save on an average interstate you will 65 thousand gallons of fuel a day. Now this makes sense folks, you don't consume it, you don't breathe it. Most arguments against the direct route seem a bit shellfish and really are intended to obstruct not construct the highway. We need and we want the construction of this highway for the forgotten quadrant of Indiana, it will save countless hours of travel for our critically ill and the public. 2.3.1

0821-202 Puccini, John.wpd

Gregg McManus... My name is Gregg McManus I'm a resident of Evansville, I like to commend INDOT for it's comprehensive EIS and the common sense that it used in meeting the purpose and need study and making a direct line between the resources of Indianapolis, Indiana University, the Technology center of Crane Naval Base and then linking it to the manufacturing center down here, the agriculture, the perf, the University, that's what makes sense. Secondly with regard to the design in 41, 70 by putting this permanent dogleg or right angle zig zag into this system that we have heard from the Federal Highway Administration does not make any sense and if every state does the same thing that Indiana proposed with 41, 70 that will not be an interstate, it will be a joke, no one will use it, it will inefficient. Along the same lines, if we build a 41, 70 interstate highway that cost the western side of Indiana and throws half of the benefits over into Illinois for leaving Hoosier deprived in a foreign area, shame on us. And four I'd like to ask INDOT to dig a little deeper with their study to tell us down here what will happen to us if they build 41, 70 during that five to ten year period when that's going on. Will we also have to go onto those inappropriate rural roads with propane tanks, fuel trucks, school busses even more so than we do now, that ought to be studied a bit further. And finally I think I'm frustrated like perhaps some of you in the fact that we seem to be facing a box where quality of life is over here and the highway is over here. There are plenty of places in this nation where we have great quality of life and interstates go right past us. 2.3.1 5.12

0821-244 McManus, Gregg.wpd

PUBLIC HEARING COMMENTS

Mike Mentzea... Good evening. What I'm going to talk about has nothing to do with economic growth and nothing to do with the environment. But I as Manager of School Bus transportation (inaudible) school corporation (inaudible) our children. Apparently the roads that go to Indianapolis up through Bloomington. If we have to go up to Indianapolis we use the 41, 70 corridor. We took 84 trips last year in that area, traveled over 34, 000 miles within those 34,000 plus miles we crossed over 1000 railroad tracks. In 36, 792 crossroads while negotiating 5,712 traffic control signals. Between the Lloyd Expressway and I-70 there are 34 traffic lights. What I was asked to do was give you information, I make decisions daily based on factional information received from the children. Those are facts. We have those 84 trips, numerous trips that the corridor describe in the direct route would be for our academic competitions where we could access. Currently for our buses travel those locations they must travel single lane road that is laid out designed and constructed before most of us was born. I have to look at conditions of the roadway in the worst case scenarios, winter, snow, ice, and single lane roads for my buses loaded with school children is a concern for me. I have a responsibility for their safety, I have (inaudible). Thanks. 2.3.1

0821-255 Mentzea, Mike.wpd

Subj: DEIS Comments
Date: 11/5/02 5:57:01 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Patricia Powell
Address = 2806 W. Fawkes Way Dr.
City = Bloomington
State = IN
ZIP = 47404
Email = powe1ra@bluemarble.net
Message = I am in favor of I69 taking the most direct route to Evansville. I am in favor of using St. Rd 37 through Bloomington, to Beford, then angling toward St. Rd 57 to Evansville. The second choice would be taking St. Rd. 67 and angling to St. Rd. 57 and to Evansville. It only makes sense to use the right of ways already in place, and upgrading to an Interstate. Less land would be disturbed, less cost involved than completely new roads being built, and less time is used. I can not understand individuals that would rather sit in the dark ages, watching people being killed every week, by crossing very busy highways, in front of fast moving traffic. Also semis are constantly speeding, swerving in and out of traffic, to get to their next destination. The businesses that are in place in cities such as Bloomington, are not going to be hurt by the Interstate, but only bring more people from other areas, to invest in the community. A point that has not been mentioned before, is that the IU School of Music send hundreds of musicians to Evansville and Owensboro, every week to play in the Symphony Orchestras there. They travel through back roads, in unsafe conditions, i.e. weather, darkness, animals on the highways, etc., to further their desires to become proficient in Music and make what little income they can. We owe our children the safest ways possible, for their future. I vote for I69, and as soon as possible. 2.3.1

1105-102 Powell, Patricia.wpd

Subj: New I-69 Study Form Feedback
Date: 11/4/02 2:22:42 PM EST
From: cortsey@exchange.indiana.edu (Craig Ortsey)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Craig Ortsey
2404 Abbey Dr. #8
Fort Wayne, IN 46835

Message:
Mike Grovak
Project Manager
Bernadin, Lochmuller & Associates, Inc.
6200 Vogel Road
Evansville IN 47715

4 November 2002

Dear Manager Grovak:

The purpose of my writing this letter today is to encourage you to resist the lobbying that you have been receiving from many members of the Bloomington community and follow the conclusions of your analysis that show that the Interstate 69 alternatives that run through Bloomington are the most efficacious. Three reasons exist for my position: the dictates of the foundational legislation for the interstate highway system; the likely identity of a significant minority of the users of the highway; and the potential synergies that exist between Indiana University and the interstate extension.

As I am sure you are aware, the interstate highway system was created to connect American population centers with one another. Bloomington is the largest city in Indiana and one of the few Metropolitan Statistical Areas (MSAs) in the country that does not have a direct connection to the interstate system. Any alternative for extending I-69 that does not include Bloomington would ignore this first principle of the interstate system and would likely meet significant resistance for that reason at the federal level. 3.4.3

Bloomington, as the home of Indiana University, is subject to a considerable amount of transient traffic. Many of these vehicles are occupied by students driving back and forth from the university on the weekends or before and after school holidays. Others are driven by alumni and fans of the university's sports teams and arts programs who are only in town for a day or so. Especially for students and visitors who live in Evansville and other locations in southwest Indiana, the lack of an interstate between their homes and the university is a constant source of irritation and danger from being forced to drive on slow, narrow, unsafe two-lane highways for much of their journey. If the interstate between Evansville and Indianapolis is not built through Bloomington, the traffic created by those students and alumni is not going to disappear. In fact, as the university continues to grow, it will probably increase along with its concomitant problems. Squandering this opportunity to alleviate at least some of these traffic concerns by building the interstate along the route that is fastest for through-traffic anyway seems myopic in the extreme. 2.3.1

As I mentioned before, Bloomington is one of the few MSAs in the nation that does not have direct access to the interstate system. When the northern extension of I-99 in State College, Pennsylvania opens in a few weeks, it will also be the only host city of a Big Ten university that does not have a nearby interstate. Even before the highway opens, the state and the university recognized the potential synergies that exist between the road and one of Pennsylvania's foremost centers of higher education. Penn State's research park, which is designed to incubate new high-technology firms and translate the basic research done by university professors into viable companies, was deliberately given an exit from I-99 in order to encourage more companies to locate there and provide jobs to the community. Bloomington has suffered from a considerable number of job losses in the past five years, and the creation of a similar research park in conjunction with an I-69 extension would undoubtedly benefit both the community and university through improved town-gown relations and economic growth. Locating the highway on an alignment that does not include Bloomington would do nothing to halt the flow of manufacturing jobs out of the city and would probably discourage other employers from taking advantage of the other resources the city has. 3.4.4

In conclusion, I would like to strongly encourage you to follow the results of your analysis (shortest travel times, greatest economic return, etc.) and choose an alternative for the I-69 extension that includes Bloomington. Alternative 3C would probably be the best one as it uses the greatest amount of State Route 37 and gives the best local access to the interstate, but Alternative 3B would also be acceptable. You should know that I wrote a previous letter on this matter; please remove that address from your mailing list and direct all future correspondence to me through the e-mail address included with this note. Thank you for your consideration and the opportunity to express my views on this topic.

Sincerely,
Craig Ortsey
cortsey@exchange.indiana.edu

1104-014 Ortsey, Craig.wpd

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FACSIMILE

To: MICHAEL GROVAK

Fax Number: 812-479-6262

From: TOM CHEEK

Date: 11-7-02

Total # of pages *(including cover sheet)*: 3

Message:

COMMENTS RE. I-69

J.J.B. Hilliard, W.L. Lyons, Inc., 329 Main Street, Evansville, IN 47708
(812) 426-1481 ■ (888) 426-1481 FAX ■ (812) 428-8697
http://www.hilliard.com ■ invest@hilliard.com

J106-131

Thomas Allen Cheek
8121 Newbury Road
Evansville, IN 47725

Mr. Michael Grovak, Project Manager
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, IN 47715

November 6, 2002

Dear Mr. Grovak,

I wish to express my strong support for a direct Interstate 69 from Evansville to Indianapolis for the reasons listed below. I want to register my equally strong opposition to the potential conversion of U.S. Highway 41 to an Interstate roadway from Terre Haute south.

I have been a resident of Evansville, IN since 1986 and have traveled throughout southern and western Indiana. The trip to Indianapolis is difficult and too lengthy. Evansville is the third largest city in Indiana and our citizens, and those in surrounding counties, deserve and need a direct Interstate 69 to Indianapolis for our thousands of business and family trips to our state capital. As you know, it currently takes about 3 ½ hours to make this trip that should require about 2 ½ hours. Conservatively, it requires at least 1 ½ hours of extra driving time for a round trip. That, added to a full business day, makes for a weary driver. Many times I have stayed over night in Indianapolis, rather than drive home late. Therefore, what should be a long, one-day business trip takes a day and a half. Multiply that times the thousands of business travelers similarly effected annually.

The new Interstate 69 should (I say must) go near Bloomington. Hundreds of our young people travel those hazardous highways to Indiana University. My daughter attended IU and I know first hand that I detested that trip when I took her, and I feared for her when she drove herself or rode with others. One must drive those roads regularly to appreciate a parent's concern. Not only are the roads narrow, hilly and filled with tight curves, but also they are routinely traveled by coal trucks and farm machinery. I have often been concerned for our lives, while driving in the middle of the day behind a coal truck in foggy, misty, slick conditions. The wipers can not keep the windshield clean and the roads become unsafe at any speed. 2.3.1

Please do not allow U.S. Highway 41 to be ripped up and placed under construction for years to come. I have driven U.S. Highway 41 hundreds of times and I am very familiar with the trip through Princeton, Vincennes, Sullivan, Terre Haute and on through Vermillion County. U. S. Highway 41 has undergone many improvements through the years. I have snaked around orange barrels, bumped on rough pavement and waited in countless traffic stops. Millions and millions of tax dollars have been spent. But it was all worth it. We now have a well-surfaced, straight, four-lane highway to serve the needs of western Indiana. Now that it is finally finished, please do not rip it up and force me, and the tens of thousands who utilize this highway daily, to endure additional construction for the next decade. How long would it take to drive to Indianapolis during that construction? 4 hours? 5.12

The cost of the Terre Haute route is said to be less than a direct, new terrain route. If the cost of extra time and fuel are considered the direct route is probably cheaper. Furthermore, with the direct route, we get two outstanding roads, Interstate 69 and U.S. Highway 41, for the price of one. And we get the use of the fully functional U. S. Highway 41, until the new Interstate 69 is opened. All of these real costs and opportunity costs should be added to the Terre Haute route alternative.

The concerns for family farms and diminished productive land have been overstated. I own a family farm. It has been in my family over 135 years. If an Interstate highway threatened my farm, I would oppose it with every ounce of energy. However, I would expect the state to pursue the best route on behalf of its citizens. If I lost the fight, I would be terribly sad and unhappy. But the state can not select the route based on the concerns of individual landowners ...even Senator Richard Lugar. The number of tillable acres taken out of production will be insignificant. Moreover, via set aside programs and conservation programs, the U.S. government currently pays farmers to not produce on millions of acres. Farmers buy and sell land all the time. I doubt that the direct route will require a significant amount of multi-generation farm ground.

Environmental concerns must be balanced with the opportunities to enjoy it. I consider myself an environmentalist. I have personally planted over 10,000 trees on my farm. I love our national parks and national forests. I am in favor of the direct route for Interstate 69, because it will open up the wonders of southwest Indiana for local and interstate travelers. I so enjoy the trip by Interstate 64 to Louisville. The exposed bedrock formations and the beautiful colors of the trees would otherwise be missed by many commuters.

The direct route for Interstate 69 will open up many economic opportunities for the small rural towns along the way. I was born and raised in such a town and it has suffered economically over the past 35 – 40 years. I guarantee they would love to have a nearby Interstate. The new jobs and economic benefits would be enormous.

Do not allow the proponents of the Terre Haute route to continue to mislead public opinion. The real motivation of the Terre Haute proponents is not cost savings, the environment or concerns for farmers. A perusal of the county plat books (from the counties along U. S. Highway 41) clearly identifies the single landowner that has the most to gain from the construction of an Interstate highway in those counties. I remain amazed that this fact has not been researched and publicized.

I have read most of the public information, engineering reports and feasibility studies related to Interstate 69. The logic of the direct route and the flaws of the Terre Haute route are thoroughly documented. I wish to register my considered support for a direct route in the general direction from Evansville, through Washington, near Bloomington and on to the west side of Indianapolis. As to the exact, best alternative, I express no preference. I strongly oppose the Terre Haute route. Were that the selected alternative, I would oppose the construction of Interstate 69, because it would be such a terrible waste of resources. Thank you.

Sincerely,

Thomas A. Cheek

Thomas Allen Cheek

Subj: DEIS Comments
Date: 11/4/02 10:18:02 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Kenneth C. Shook
Address = 6438 Bayside Court
City = Indianapolis
State = IN
ZIP = 46250-4435
Email = kcs@iquest.net
Message = Dear Project Team,

I have reviewed the materials in the Tier 1 Draft Environmental Impact Study (T1-DEIS) for the Evansville to Indianapolis portion of High Priority Transportation Corridor 18, also known as Segment of Independent Utility (SIU) #3 for the proposed "National I-69". I find both the process and your conclusions to be honest, fair, and valid. I fully support your narrowing of potential corridors to those labeled "preferred alternatives" in that document. Furthermore, I would like to state my personal preference of Alternative 3C and recommend that it be selected as the designated routing for the "build option" to be advanced to Tier 2 of this process. I will state my reasons for this preference below as well as comment on both why I am pleased that Alternative 1 has been labeled as a "non-preferred alternative" and why I feel it should now be permanently eliminated from any further consideration.

I would like to clearly state here that I am an individual, a private citizen, a resident of and taxpayer in the State of Indiana, who deeply cares about the future of our great region. I do not belong to, nor do I represent, any special interest, lobby, or other organized group, many of which have tried to hijack, or at least steer, this process (rightly or wrongly) toward their own narrow agendas. I am merely someone with an interest in making our state a better place for both ourselves and for future generations, by trying to help our government avoid mistakes that we all would have to live with (and pay for) if we collectively exercise shortsightedness today.

I want to also thank the many people and companies involved in this project for their time and efforts, as well as for reaching out to the public for their comments and ideas, and for helping to spread the word about this important public works endeavor. I know with the strong emotions invoked by this project, it must not have been easy for many of you. So let me offer my personal thanks for a job well-done under very difficult circumstances!

My personal analysis: Selecting a "final alternative":

Bloomington:
Of the preferred alternatives from the T1-DEIS, I firmly believe it would be a serious mistake to route the I-69 extension away from the Bloomington area. As stated in that document, alternatives that serve major population centers generally do far better that those that do not. Bloomington is the seventh largest city in the state of Indiana, and home to the main campus of its premier institution of higher learning, Indiana University. It is also, by far, the largest city in the state not currently served by an Interstate highway (or even, for that matter, by a U.S. highway). For this and many other reasons, I believe an additional core goal should be defined to state that improved access to Bloomington, both from Indianapolis and from Evansville, should be a criteria for this project. In spite of the many vocal isolationists in the Monroe County area who don't seem to want any highway improvements, as a former resident of that fine community, I can personally attest that Bloomington needs better and safer highway access, to enable both the city and the university to continue to prosper.

3.4.3

2.3.1

Pros and Cons of "Preferred Alternatives":
The addition of the above goal would immediately eliminate Alternatives 2C, 4B, and 4C, as none of these routings would directly serve the Bloomington area. However, there are additional reasons these route alternatives should be dropped from further development. In Alternative 2C, the Evansville-area terminus would be around 4 miles west of that for the other preferred alternatives, necessitating a counterproductive (unless an unlikely western routing for I-69 SIU #4 is chosen) multiplex on I-64 for that distance. Furthermore, it would not provide any congestion or crash reduction for the Martinsville - Bloomington segment of the Indiana 37 corridor, and the travel time savings between Evansville and Bloomington would be low.

3.4.3

Alternative 4B, like any routing using I-70, has several major disadvantages. First, it would add a high volume of unnecessary thru-traffic congestion to the I-70 corridor near Indianapolis International Airport (remember, I-70 will also soon become the main access point to that facility upon opening of the new mid-field main passenger terminal complex in 2007). It also has a very high potential to add unnecessary thru-truck traffic on the portions of I-70 within I-465, directly through crowded central areas of Indianapolis. Furthermore, it provides no traffic congestion relief or accident reduction on the Indianapolis - Martinsville section of the Indiana 37 corridor, and since it creates no additional urban freeway mileage in Marion County, vehicle emissions will not be reduced through improved traffic flow. In addition to these severe flaws created by using portions of I-70, this alternative provides no congestion relief and no crash reduction for the Martinsville - Bloomington section of the Indiana 37 corridor and also has poor travel time savings between Bloomington and Evansville. 3.4.3

Finally, Alternative 4C , similar to 2C, does not provide any congestion or crash reduction for the Martinsville - Bloomington segment of the Indiana 37 corridor, and the travel time savings between Evansville and Bloomington would also be low. 3.4.3

Thus, my conclusion is that the Alternative 3 options, either 3B or 3C, would best serve the public for the future. Either would provide excellent travel time reductions between Evansville and Bloomington, and relieve congestion and reduce accidents along the Indiana 37 corridor between Indianapolis, Martinsville, and Bloomington. However, since alternative 3B would have greater forest impacts that 3C, I am recommending that Alternative 3C be selected as the final corridor.

Additional Ideas:
Another advantage of Alternative 3C is that is provides a "complete" west-side freeway bypass of Bloomington, and could allow for a concurrent or future upgrading of Indiana 37 south of there to become a potential "I-569" connection down to U.S. 50 near Bedford. This could serve to help extend vital economic benefits across a larger area of south-central Indiana. Similarly, an "I-369" connection to Vincennes could be created by upgrading U.S. 50 / U.S. 150 from the Washington area west to the existing U.S. 41 bypass. This could help soothe some of the economic concerns which that area's residents have about any potential I-69 routing that does not go directly through their immediate area. 5.8

Segments of Independent Utility within Alternative 3C:
If the project team settles on Alternative 3C as I have recommended, I propose that the following "Segments of Independent Utility" (SIU) be defined for this project (which itself as a whole is SIU #3 of the "national I-69" project"):

Segment	Description
3A	I-64/I-164 to Petersburg includes rebuilding I-64 Exit 29 as a full Freeway-to-Freeway interchange
3B	Petersburg to Washington
3C	Washington to Crane Naval Surface Warfare Center ("Crane NSWC")
3D	Crane NSWC to Indiana 37 (SW of Bloomington)
3E	SW of Bloomington to NE of Martinsville incorporates the existing (upgraded) Indiana 37 "Bloomington bypass" and a new-terrain "Martinsville bypass"
3F	NE of Martinsville to I-465 includes rebuilding I-465 Exit 4 as a Freeway-to-Freeway interchange
3Y (optional)	I-369: upgrade U.S. 50/150: from U.S. 41 at Vincennes to I-69 near Washington
3Z (optional)	I-569: upgrade Indiana 37: from U.S. 50 (SW jct.) near Bedford to I-69 at Bloomington

3.5

Within each of the above SIU's, there would be multiple "sections" defined, in order to break each down into manageable individual projects for bidding, design, and construction purposes.

Alternative 1 - Why I believe it's proponents are wrong:

Many special interest groups have waged intensive media campaigns to convince gullible individuals to support and promote Alternative 1, which was classified as a "non-preferred alternative" in the TI-DEIS, as a so-called "common sense" route for the I-69 extension. I believe most of those people conveniently choose to ignore the facts in this situation: furthermore, I doubt many of them have taken the time to objectively analyze the data you presented within your report. I strongly urge you to give their mass-produced, pre-packaged public comment responses little or no weight in your final deliberations.

Proponents of this alternative conveniently forget (or intentionally omit) the negative environmental impacts of the added vehicle emissions due to the longer route when expressing their concern over the "environmental damage" that a predominantly new-terrain route would cause. Just in interstate truck travel alone (according to the TI-DEIS), an estimated 2300 to 2600 additional hours of daily operation (and emissions) would result from the choice of Alternative 1 over one of the Alternative 3 options. 5.9

In addition, the people and interest groups promoting a Terre Haute to Evansville via U.S. 41 routing ignore what other states are generally concluding, that it is prohibitively expensive to upgrade most existing expressway routes into full-freeway facilities, due to the massive business relocation, frontage road requirements, and other design constraints of a highway built to Interstate System standards (as this road must be, by Congressional mandate). In fact, throughout the proposed Corridor 18, no state to-date is seriously considering upgrading so many miles of existing expressways into a full-freeway facility (though several, such as Kentucky, are planning to upgrade existing, sub-Interstate grade freeways for use as I-69). They are all instead opting for new-terrain solutions. Why aren't those opponents of new-terrain routing for Indiana raising their so-called "common sense" concerns in those other states? My belief is that most are just flat opposed to any new highway construction altogether or suffer from the NIMBY (Not In My Back Yard) syndrome.

As to potential loss of farmlands, more is lost daily to suburban residential sprawl and unnecessary, redundant commercial developments than would be lost to the development of I-69 via any of the "direct" corridors in Indiana. Why are those voices of protest against such a direct route between Evansville and Indianapolis for Corridor 18 silent on that issue? Some claim that a new-terrain solution of I-69 would create more of that sprawl, but with proper zoning and enforcement, that would not necessarily be the case. And where were these people when the Pennsylvania's infamous "Interstate 99" was rammed through Congress? Or when Illinois built the I-72 "road to nowhere" west of Springfield? Other states have long built unnecessary roads using Federal funds, while Indiana has suffered with real transportation needs and a lack of public will to complete our road system. We should not let outsiders dictate to us anymore. Of course, we should take every reasonable precaution to protect out fragile environment and to maximize the value for the funds we will spend, but I believe that INDOT, the FHWA, and other involved parties will do their best to do just that. But we must build a sensible, direct freeway link between Evansville and Indianapolis as soon as possible. And that route should NOT go via Terre Haute!

I believe that to waste any more time and effort on this flawed alternative would only serve to further squander the taxpayers' money that its proponents claim to be so concerned about. These sore losers have had their chance to make their case and must now accept the fact that better alternatives exist. While Alternative 1 appears to be slightly cheaper in the short-term (though I strongly doubt that the full costs for necessary upgrades to the I-70 portions of that route have been fairly estimated or included), it clearly does not meet the purpose and need of the project as stated in the TI-DEIS. Therefore, I firmly believe that to pursue such a routing any further would be "penny-wise and pound foolish" and thus, not in the best interests of either the people of Indiana or the taxpayers in the rest of our great nation.

Thank you for your attention!

Respectfully submitted,
Kenneth C. Shook

Contact Information:
Kenneth C. Shook
6438 Bayside Court
Indianapolis, IN 46250-4435

(317) 842-6624
kcs@iquest.net

1104-008 Shook, Kenneth.wpd

Subj: DEIS Comments
Date: 11/4/02 10:50:21 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = TERRY L EDEN
Address = 799 WOODRUFF PLACE EAST DRIVE
City = INDIANAPOLIS
State = IN
ZIP = 46201
Email = RAINELLEEDEN@AOL.COM
Message = If the objective behind extending I-69 is to create a corridor between Canada and Mexico, I recommend choosing the shortest route between Evansville and Indianapolis. Should every state divert the project route to accomodate existing routes as many in Indiana are proposing with routing I69 along I70 & US 41, the route between Port Huron, Michigan and Brownsville, Texas will meander so greatly that it might dilute any economic impact that Indiana might realize otherwise.

In that spirit, I suggest that we consider the northern terminus of the I69 Indianapolis to Evansville project to be the current I69 - I465 interchange near the Indianapolis suburb of Castleton. They could easily route the I69 southwestward along Binford Blvd and then south over a seldom used railroad line to junction with I65 & I70 at the Spaghetti Bowl. Not only would this make the trip shorter for anyone traveling from Canada to Mexico, having the improved infrastructure would foster development in the increasingly blighted inner-city of northeast Indianapolis. 2.3.1

Planners originally intended for I69 to extend to the I65 - I70 interchange. I wonder how much money we actually saved by routing northeastbound traffic along eastbound I70 and Northbound I465. We seem to continue to add a couple of lanes to that dog-legged corridor every decade since we chose the less direct route. Ironically, they have even debated establishing a light rail line between downtown and Castleton, generally the route orginally proposed for I69!

Although I'm too old to see it, I expect that in 50 years someone will propose commuter rail service to Evansville after we've upgraded I70 and US 41. I wonder how many lanes wide I70 will be by then?

1104-031 Eden, Terry.wpd

Subj: New I-69 Study Form Feedback
Date: 11/5/02 8:35:56 AM EST
From: btcarter@ameritech.net (Bradley Carter)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Bradley Carter
616 Summitcrest Drive
Indianapolis, IN 46241-1725

Message:
Take the most direct route.

1) For those concerned about the environment, think about the annual savings in fuel not burned by millions of vehicles because of the shorter distance.

2) The upgrading of I70/US41 would disrupt traffic for an unimaginable amount of time for an unnacceptable number of drivers.

3) The "sacrifice" of acreage of beautiful forests and farmland (including Sen. Lugar's) is a very small percentage of the scenic and productive region of southern Indiana. And, more people might be motivated to enjoy the part of the state where I was raised (Bedford) if they could reach it without having to drive behind a coal or stone truck for mile after mile traveling 40 mph uphill and racing at 85 mph downhill to keep from getting run over! 2.3.1

Thank you,
BC

1105-025 Carter, Bradley.wpd

Subj: DEIS Comments
Date: 10/30/02 3:05:00 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Mark H. Miller
Address = 627 Forest Park Dr.
City = Newburgh
State = IN
ZIP = 47630
Email = mmiller@vectren.com
Message = I grew up in Indianapolis. After High School, I attended the University of Evansville....and stayed. In part because it is a wonderful place to live. And, because there was no way to get back home!
I applaud INDOT's procedure (if not the speed) of producing the EIS. A transportation project that did not study the physical and economic isolation of southwest Indiana would have been the same as no study at all.
But the EIS does give serious study to the fact that of the ten largest communities in Indiana, only 3 (Evansville, Bloomington & South Bend) do not have an interstate link to our capitol. And only one (Evansville) does not have ANY direct 4-lane access.
The EIS is quite correct in noting that a more direct route for I-69 would better serve the economic needs of southwest Indiana (sadly, home to several of the poorest counties in our state).
And, having lost several friends over the years to the carnage of the older and more dangerous roads in the area, I applaud how the EIS confirmed that a direct I-69 would save Hoosier lives. We can replant a tree -- we cannot replace a soul lost on the road. 2.3.1
I know you receive many venomous comments from citizens (and several out-of-state environmental groups)thinking that a so-called "upgrade" of US41 and I-70 would be a simple alternative to a more direct route. The representatives from the Environmental Policy Center in Chicago don't travel to Indianapolis by way of Terre Haute to make spread their mis-information. Asking southwest Indiana residents to take such an out-of-the-way route is equally ludicrous.
As a Hoosier, I am proud of how INDOT has focused on the true facts generated during the EIS process. The data gathered has led to the only logical conclusion: a direct route for I-69 would be the MOST beneficial for the MOST residents in Indiana.

Mark H. Miller
Newburgh, IN

1030-005 Miller, Mark.wpd

Subj: DEIS comments
Date: 11/7/02 4:16:02 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Michael
LastName = Halbrook
StreetAddress = RR6 Box 303
Address =
City = Bloomfield
State = IN
ZipCode = 47424
Email = halbrook@indiana.edu
Comments = As a property owner in Greene County, I want to go on record as being against any "new terrain routes" for I69. In my 30 years of experience living and working throughout the U.S. (Midwest, West coast, East coast) and having directly driven in and visited 49 states, Interstate roadways provide a critical link for both commerce and civilian transportation. My observations from driving these tens of thousands of miles on Interstates are that very few small to mid-size communities have reaped any large scale, economic business-related growth. That is not to say some communities haven't benefited, but this tends to be the exception rather than the rule. Benefits for smaller communities from Interstate roadways are generally much smaller and in the form of closer access to an Interstate. Period. Interstates benefit the commercial traffic between already established commercial centers/cities. The trade-off for a new-terrain I69 in So. Indiana is rural decay - loss of farmland, loss of woodlands, noise pollution from the traffic, and visual pollution via billboards. Additionally, the secondary state highways like SR 54 and SR 45 will carry an additional traffic load to and from I69. These smaller state roads are already heavily burdened with traffic and not built for an increased traffic load. Safety on these roads is an issue. 3.4.4

Whether you buy into any of these arguments or not depends mostly where one lives. I grew up in Indiana and left after college. 30 years later I moved back to Indiana, one of the main reasons being quality of life. I would have not purchased property in Greene County knowing that a new-terrain I69 would be close by. Currently I am looking into starting up a business in Greene Co., this decision is not driven by having I69 nearby, and I69 has absolutely no bearing on the business plan. I suggest choosing a more suitable route, like Route 41 if you are intent on keeping the I69 extension in Indiana. I'll leave you with an I69 haiku:

build it and will come
billboards, noise, rural decay
quality progress?

1107-136 Halbrook, Michael.wpd

Subj: DEIS Comments
Date: 10/23/02 0:20:18 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Jayson Earleywine
Address = 6109 Mikco Lane
City = Indianapolis
State = IN
ZIP = 46250
Email = Jearleywine@bfsengr.com
Message = I have read the summarized version (HTML) of the EIS. I am in favor of Alterative 3b, 4c, 5a & 5b.

The traffic on SR 37 corridor is highly congested, as I'm sure the traffic counts reflect. And, it's only going get worst. Something needs to be done along SR 37. Why not create an interstate quality highway? The alternative would be adding travel lanes to relieve the congestion. Which it only a temporary fix. So, why not use the Federal funds to assist Indiana improve it's transportation system. 2.3.1

Alternative 1 that the news and other organizations are promoting may have a lower price tag. But does nothing to improve the transportation needs of the state of Indiana. It makes no sense. It would only increase traffic on I-70 & US 41. It does nothing to improve the overall quality of Indiana residents. People live in there big houses w/ their big screen TV's when a smaller less expensive alternatives exists. Do people complain about how expensive their lives are? No. They live with it, because they want to have a certain level of comfort. Not to spend 25 more minutes in thier cars because it was the cheapest alternative. 3.4.6

1023-001 Earleywine, Jayson.wpd

Jeanne Melchior
8760 N Crystal Road N
Dubois, IN, 47527
812-678-2667
October 28, 2002

Mike Grovak, Project Manager
Bernardin, Lochmueller, and Associates, INC.
6200 Vogel Road
Evansville Indiana 47715

Dear Mr. Grovak and associates,

I have been going to public meetings, writing letters, speaking with government officials regarding the proposed I-69 study for nearly 14 years. And during that time, a major point that I have made was the necessity of studying this highway from a rural perspective that considered the special and significantly different transportation needs of people in the rural areas that this highway passed through; that focused on protecting the rural areas of the state. In all that time, not once has this perspective been thoughtfully or meaningfully addressed. 2.3.1

The EIS for a new interstate highway MUST be conducted in a way that acknowledges the needs of rural people--who constitute an important and valuable minority. It must address the importance of farm and forest; the importance of people's lives; the importance of keeping farmers on the land and of encouraging their return; the importance of the rest of the natural world; the importance of a sustainable twenty-first century way of life!

Unfortunately, this highway is predicated on an outmoded industrial world-view in which faster and bigger are seen as better despite devastating environmental and social costs. It is based on a paradigm of reality that is leading to the total destruction of the planet. And it fails to take into consideration the reality of the people whose lives it would most affect. 5.3

We simply must define prosperity and progress in ways that value rural residents and the natural world, and in terms of a paradigm of reality that is sustainable. Prosperity means keeping our farmers on the land, producing food for us, not replacing our lush productive farms and forests with polluting industries while we truck in food from far away. Prosperity means keeping our small towns small and slow paced, not bypassed by a high speed highway straight out of the country in both directions. And prosperity means keeping jobs where they are, rather than relocating them to a new corridor or sending them to Mexico or beyond.

We need to reject this dinosaur of a highway project, and use our tax dollars to improve education and access to medical care for people in Indiana. We need to fund public transportation as well as fix all the roads we have. We need to make all the roads safe to drive. When we can make decisions based on a twenty-first century vision of true prosperity, we will also have redefined progress and will be on the way to a more sustainable future for all the people in Indiana.

Sincerely,
Jeanne Melchior
Jeanne Melchior
Board of Directors, Protect Our Woods and Hoosier Environmental Council

cc: CARR, INDOT, Governor Frank O'Bannon
Enclosures

1028-038

Paradigm Shift:

In Thomas Kuhn's landmark book, *The Structure of Scientific Revolutions*, he argued that scientific research and thought are defined by "paradigms," or conceptual world-views, that consist of formal theories, classic experiments, and trusted methods. Scientists typically accept a prevailing paradigm and try to extend its scope by refining theories, explaining puzzling data, and establishing more precise measures of standards and phenomena. Eventually, however, their efforts may generate insoluble theoretical problems or experimental anomalies that expose a paradigm's inadequacies or contradict it altogether. This accumulation of difficulties triggers a crisis that can only be resolved by an intellectual revolution that replaces an old paradigm with a new one. The overthrow of Ptolemaic cosmology by Copernican heliocentrism, and the displacement of Newtonian mechanics by quantum physics and general relativity, are both examples of major paradigm shifts.

Kuhn questioned the traditional conception of scientific progress as a gradual, cumulative acquisition of knowledge based on rationally chosen experimental frameworks. Instead, he argued that the paradigm determines the kinds of experiments scientists perform, the types of questions they ask, and the problems they consider important. A shift in the paradigm alters the fundamental concepts underlying research and inspires new standards of evidence, new research techniques, and new pathways of theory and experiment that are radically incommensurate with the old ones.

Kuhn's book revolutionized the history and philosophy of science, and his concept of paradigm shifts was extended to such disciplines as political science, economics, sociology, and even to business management.

Increasing attention is being given to articulating ethics to support humane and sustainable societies. For example, the Earth Council, in cooperation with Green Cross International, is framing an Earth Charter. And the World Conservation Union has recently issued a draft International Covenant on Environment and Development. Scientists, religious leaders, and development specialists are groping for a new ethical framework to guide human relationships with the rest of nature. The following forum offers perspectives on such a framework, indicating various sources, principles, and challenges for viable earth ethics.

The Challenge of a World Environmental Ethic

by J. Baird Callicott

An environmental ethic that takes into account the impact of human actions directly upon nonhuman natural entities and nature as a whole is called an ecocentric environmental ethic. An ecocentric environmental ethic is supported by the evolutionary, ecological, foundational, and cosmological dimensions of the presently evolving postmodern, scientific world view.

Among human beings and other social mammals, the moral sentiments evolved to enable the formation of communities. From an evolutionary point of view, Homo sapiens is part of nature, not set apart from it. We are literally kin to all other forms of life. With them we share the Earth, which we now know to be a small and precious planet, like a tropical island paradise in an otherwise desert ocean. Further, ecology presently portrays nature as a congeries of societies or biotic communities. From the subatomic to the biological realms, all reality is interconnected, internally related, and mutually defining. But relationship, kinship, and community membership traditionally imply strong moral obligations. Aldo Leopold rested his seminal and now classic land ethic upon these new, postmodern, scientific foundations.

Most indigenous and traditional environmental ethics also fit the ecocentric mold. Indeed, Western philosophers looked initially to traditional Eastern wisdom in their search, begun in earnest in the late 1960s, for an environmental ethic located in a deeply ecological consciousness. And in fact, Eastern philosophy has historically shaped the gradually emerging environmental consciousness in the West. The American Transcendentalism of Ralph Waldo Emerson and Henry David Thoreau who were among the first American thinkers to look upon nature as something more than an obstacle to progress and a pool of natural resources -was inspired by Hindu thought. Further, distinguished Norwegian philosopher Arne Naess was inspired by the Vedantic doctrine of nonduality to make cultivation of the experience of oneness with nature the core practice of his ecocentric environmental ethic, now known as Deep Ecology.

In the midtwentieth century the emerging contemporary environmental movement was profoundly influenced by Japanese Zen Buddhism. Zen had been powerfully and persuasively represented in the West by D.T. Suzuki in the early twentieth century. Alan Watts popularized Suzuki's somewhat more academic representation. The American nature poet,

Gary Snyder, inspired by Watts, studied Zen Buddhism in Kyoto. In his eventual work a raw and uncultivated American love of and sensitivity to nature was integrated with the very advanced natural aesthetic cultivated for centuries in Japan. Gary Snyder was a charter member of the midcentury American counterculture that called itself the Beat Generation romanticized by the enormously popular novelist, Jack Kerouac, in the book Dharma Bums. Thus, when Americans awakened to the environmental crisis in the late 1960s, they turned for philosophical guidance to the cultural alternatives then popular, and Zen Buddhism was by far the most in evidence. Since then, the attention of Western environmental philosophers has gravitated more to Taoism. The concept of living in accordance with the tao of nature complements the evolutionary and ecological axiom that human beings are part of nature and must conform human ways of living to natural processes and cycles. Especially in the Taoist concept of wu wei, Western environmental ethicists have found a

Home

The Earth Charter Initiative

PROMOTING CHANGE FOR A SUSTAINABLE FUTURE

THE EARTH CHARTER

March 2000

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PREAMBLE

We stand at a critical moment in Earth's history, a time when humanity must choose its future. As the world becomes increasingly interdependent and fragile, the future at once holds great peril and great promise. To move forward we must recognize that in the midst of a magnificent diversity of cultures and life forms we are one human family and one Earth community with a common destiny. We must join together to bring forth a sustainable global society founded on respect for nature, universal human rights, economic justice, and a culture of peace. Towards this end, it is imperative that we, the peoples of Earth, declare our responsibility to one another, to the greater community of life, and to future generations.

Earth, Our Home
Humanity is part of a vast evolving universe. Earth, our home, is alive with a unique community of life. The forces of nature make existence a demanding and uncertain adventure, but Earth has provided the conditions essential to life's evolution. The resilience of the community of life and the well-being of humanity depend upon preserving a healthy biosphere with all its ecological systems, a rich variety of plants and animals, fertile soils, pure waters, and clean air. The global environment with its finite resources is a common concern of all peoples. The protection of Earth's vitality, diversity, and beauty is a sacred trust.

The Global Situation
The dominant patterns of production and consumption are causing environmental devastation, the depletion of resources, and a massive extinction of species. Communities are being undermined. The benefits of development are not shared equitably and the gap between rich and poor is widening. Injustice, poverty, ignorance, and violent conflict are widespread and the cause of great suffering. An unprecedented rise in human population has overburdened ecological and social systems. The foundations of global security are threatened. These trends are perilous—but not inevitable.

The Challenges Ahead
The choice is ours: form a global partnership to care for Earth and one another or risk the destruction of ourselves and the diversity of life. Fundamental changes are needed in our values, institutions, and ways of living. We must realize that when basic needs have been met, human development is primarily about being more, not having more. We have the knowledge and technology to provide for all and to reduce our impacts on the environment. The emergence of a global civil society is creating new opportunities to build a democratic and humane world. Our environmental, economic, political, social, and spiritual challenges are interconnected, and together we can forge inclusive solutions.

Universal Responsibility
To realize these aspirations, we must decide to live with a sense of universal responsibility, identifying ourselves with the whole Earth community as well as our local communities. We are at once citizens of different nations and of one world in which the local and global are linked. Everyone shares responsibility for the present and future well-being of the human family and the larger living world. The spirit of human solidarity and kinship with all life is strengthened when we live with reverence for the mystery of being, gratitude for the gift of life, and humility regarding the human place in nature.

We urgently need a shared vision of basic values to provide an ethical foundation for the emerging world community. Therefore, together in hope we affirm the following interdependent principles for a sustainable way of life as a common standard by which the conduct of all individuals, organizations, businesses, governments, and transnational institutions is to be guided and assessed.

PRINCIPLES

I. RESPECT AND CARE FOR THE COMMUNITY OF LIFE

1. Respect Earth and life in all its diversity.

a. *Recognize that all beings are interdependent and every form of life has value regardless of its worth to human beings.*
b. *Affirm faith in the inherent dignity of all human beings and in the intellectual, artistic, ethical, and spiritual potential of humanity.*

2. Care for the community of life with understanding, compassion, and love.

a. *Accept that with the right to own, manage, and use natural resources comes the duty to prevent environmental harm and to protect the rights of people.*
b. *Affirm that with increased freedom, knowledge, and power comes increased responsibility to promote the common good.*

3. Build democratic societies that are just, participatory, sustainable, and peaceful.

a. *Ensure that communities at all levels guarantee human rights and fundamental freedoms and provide everyone an opportunity to realize his or her full potential.*
b. *Promote social and economic justice, enabling all to achieve a secure and meaningful livelihood that is ecologically responsible.*

4. Secure Earth's bounty and beauty for present and future generations.

a. *Recognize that the freedom of action of each generation is qualified by the needs of future generations.*
b. *Transmit to future generations values, traditions, and institutions that support the long-term flourishing of Earth's human and ecological communities.*

In order to fulfill these four broad commitments, it is necessary to:

II. ECOLOGICAL INTEGRITY

5. Protect and restore the integrity of Earth's ecological systems, with special concern for biological diversity and the natural processes that sustain life.

a. *Adopt at all levels sustainable development plans and regulations that make environmental conservation and rehabilitation integral to all development initiatives.*
b. *Establish and safeguard viable nature and biosphere reserves, including wild lands and marine areas, to protect Earth's life support systems, maintain biodiversity, and preserve our natural heritage.*
c. *Promote the recovery of endangered species and ecosystems.*
d. *Control and eradicate non-native or genetically modified organisms harmful to native species and the environment, and prevent introduction of such harmful organisms.*
e. *Manage the use of renewable resources such as water, soil, forest products, and marine life in ways that do not exceed rates of regeneration and that protect the health of ecosystems.*
f. *Manage the extraction and use of non-renewable resources such as minerals and fossil fuels in ways that minimize depletion and cause no serious environmental damage.*

6. Prevent harm as the best method of environmental protection and, when knowledge is limited, apply a precautionary approach.

a. *Take action to avoid the possibility of serious or irreversible environmental harm even when scientific knowledge is incomplete or inconclusive.*
b. *Place the burden of proof on those who argue that a proposed activity will not cause significant harm, and make the responsible parties liable for environmental harm.*
c. *Ensure that decision making addresses the cumulative, long-term, indirect, long distance, and global consequences of human activities.*
d. *Prevent pollution of any part of the environment and allow no build-up of radioactive, toxic, or other hazardous*

substances.
e. Avoid military activities damaging to the environment.

7. Adopt patterns of production, consumption, and reproduction that safeguard Earth's regenerative capacities, human rights, and community well-being.

a. Reduce, reuse, and recycle the materials used in production and consumption systems, and ensure that residual waste can be assimilated by ecological systems.
b. Act with restraint and efficiency when using energy, and rely increasingly on renewable energy sources such as solar and wind.
c. Promote the development, adoption, and equitable transfer of environmentally sound technologies.
d. Internalize the full environmental and social costs of goods and services in the selling price, and enable consumers to identify products that meet the highest social and environmental standards.
e. Ensure universal access to health care that fosters reproductive health and responsible reproduction.
f. Adopt lifestyles that emphasize the quality of life and material sufficiency in a finite world.

8. Advance the study of ecological sustainability and promote the open exchange and wide application of the knowledge acquired.

a. Support international scientific and technical cooperation on sustainability, with special attention to the needs of developing nations.
b. Recognize and preserve the traditional knowledge and spiritual wisdom in all cultures that contribute to environmental protection and human well-being.
c. Ensure that information of vital importance to human health and environmental protection, including genetic information, remains available in the public domain.

III. SOCIAL AND ECONOMIC JUSTICE

9. Eradicate poverty as an ethical, social, and environmental imperative.

a. Guarantee the right to potable water, clean air, food security, uncontaminated soil, shelter, and safe sanitation, allocating the national and international resources required.
b. Empower every human being with the education and resources to secure a sustainable livelihood, and provide social security and safety nets for those who are unable to support themselves.
c. Recognize the ignored, protect the vulnerable, serve those who suffer, and enable them to develop their capacities and to pursue their aspirations.

10. Ensure that economic activities and institutions at all levels promote human development in an equitable and sustainable manner.

a. Promote the equitable distribution of wealth within nations and among nations.
b. Enhance the intellectual, financial, technical, and social resources of developing nations, and relieve them of onerous international debt.
c. Ensure that all trade supports sustainable resource use, environmental protection, and progressive labor standards.
d. Require multinational corporations and international financial organizations to act transparently in the public good, and hold them accountable for the consequences of their activities.

11. Affirm gender equality and equity as prerequisites to sustainable development and ensure universal access to education, health care, and economic opportunity.

a. Secure the human rights of women and girls and end all violence against them.
b. Promote the active participation of women in all aspects of economic, political, civil, social, and cultural life as full and equal partners, decision makers, leaders, and beneficiaries.
c. Strengthen families and ensure the safety and loving nurture of all family members.

12. Uphold the right of all, without discrimination, to a natural and social environment supportive of human dignity, bodily health, and spiritual well-being, with special attention to the rights of indigenous peoples and minorities.

a. Eliminate discrimination in all its forms, such as that based on race, color, sex, sexual orientation, religion, language, and national, ethnic or social origin.
b. Affirm the right of indigenous peoples to their spirituality, knowledge, lands and resources and to their related practice of sustainable livelihoods.
c. Honor and support the young people of our communities, enabling them to fulfill their essential role in creating

sustainable societies.
d. Protect and restore outstanding places of cultural and spiritual significance.

IV. DEMOCRACY, NONVIOLENCE, AND PEACE

13. Strengthen democratic institutions at all levels, and provide transparency and accountability in governance, inclusive participation in decision making, and access to justice.

a. Uphold the right of everyone to receive clear and timely information on environmental matters and all development plans and activities which are likely to affect them or in which they have an interest.
b. Support local, regional and global civil society, and promote the meaningful participation of all interested individuals and organizations in decision making.
c. Protect the rights to freedom of opinion, expression, peaceful assembly, association, and dissent.
d. Institute effective and efficient access to administrative and independent judicial procedures, including remedies and redress for environmental harm and the threat of such harm.
e. Eliminate corruption in all public and private institutions.
f. Strengthen local communities, enabling them to care for their environments, and assign environmental responsibilities to the levels of government where they can be carried out most effectively.

14. Integrate into formal education and life-long learning the knowledge, values, and skills needed for a sustainable way of life.

a. Provide all, especially children and youth, with educational opportunities that empower them to contribute actively to sustainable development.
b. Promote the contribution of the arts and humanities as well as the sciences in sustainability education.
c. Enhance the role of the mass media in raising awareness of ecological and social challenges.
d. Recognize the importance of moral and spiritual education for sustainable living.

15. Treat all living beings with respect and consideration.

a. Prevent cruelty to animals kept in human societies and protect them from suffering.
b. Protect wild animals from methods of hunting, trapping, and fishing that cause extreme, prolonged, or avoidable suffering.
c. Avoid or eliminate to the full extent possible the taking or destruction of non-targeted species.

16. Promote a culture of tolerance, nonviolence, and peace.

a. Encourage and support mutual understanding, solidarity, and cooperation among all peoples and within and among nations.
b. Implement comprehensive strategies to prevent violent conflict and use collaborative problem solving to manage and resolve environmental conflicts and other disputes.
c. Demilitarize national security systems to the level of a non-provocative defense posture, and convert military resources to peaceful purposes, including ecological restoration.
d. Eliminate nuclear, biological, and toxic weapons and other weapons of mass destruction.
e. Ensure that the use of orbital and outer space supports environmental protection and peace.
f. Recognize that peace is the wholeness created by right relationships with oneself, other persons, other cultures, life, Earth, and the larger whole of which all are a part.

THE WAY FORWARD

As never before in history, common destiny beckons us to seek a new beginning. Such renewal is the promise of these Earth Charter principles. To fulfill this promise, we must commit ourselves to adopt and promote the values and objectives of the Charter.

This requires a change of mind and heart. It requires a new sense of global interdependence and universal responsibility. We must imaginatively develop and apply the vision of a sustainable way of life locally, nationally, regionally, and globally. Our cultural diversity is a precious heritage and different cultures will find their own distinctive ways to realize the vision. We must deepen and expand the global dialogue that generated the Earth Charter, for we have much to learn from the ongoing collaborative search for truth and wisdom.

Life often involves tensions between important values. This can mean difficult choices. However, we must find ways to

harmonize diversity with unity, the exercise of freedom with the common good, short-term objectives with long-term goals. Every individual, family, organization, and community has a vital role to play. The arts, sciences, religions, educational institutions, media, businesses, nongovernmental organizations, and governments are all called to offer creative leadership. The partnership of government, civil society, and business is essential for effective governance.

In order to build a sustainable global community, the nations of the world must renew their commitment to the United Nations, fulfill their obligations under existing international agreements, and support the implementation of Earth Charter principles with an international legally binding instrument on environment and development.

Let ours be a time remembered for the awakening of a new reverence for life, the firm resolve to achieve sustainability, the quickening of the struggle for justice and peace, and the joyful celebration of life.

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Precautionary Principle

"A Paradigm Shift: Rethinking Environmental Decision Making and Risk Assessment"

Carolyn Raffensperger and Peter deFur
Paper presented to Risk Analysis Policy Association Meeting
Virginia
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PROLOGUE

Many of our city friends have a small box of tools in a closet. That box contains the hammer, screwdriver and pliers that they need to fix a sink or put together the computer desk they ordered in a catalogue. One of us (Carolyn) lives on a farm. There are entire barns and quonset huts filled with the tools necessary to work the 3100 acres that comprise this farm. We need those tools to shoe horses, till fields, repair fences and trucks. They are different tools that urban dwellers use in their daily lives.

It is in the spirit of searching for the right tools for the task that we offer the ideas in this paper: if we want to live in a sustainable world, what environmental decision-making tools can we design or find?

INTRODUCTION

Robert Constanza has said that "[d]efining sustainability is actually quite easy: a sustainable system is one that survives for some specified (non infinite) time. The problem is that one knows one has a sustainable system only after the fact. Thus, what usually pass for definitions of sustainability are actually predictions of what set of conditions will actually lead to a sustainable system."1 Wes Jackson adds another axis to Constanza's dimension of time when he says that "[s]ustainability is a spatial-temporal concept.2

We do have some idea about the characteristics of sustainable systems. They:

- **do not use nonrenewable resources any faster than we can find substitutes.**
- **do not use renewable resources any faster than nature can regenerate them.**

- do not generate pollution any faster than earth's planetary sinks can absorb, dissipate or disperse it.
- safeguard inter-generational equity.3

Environmental regulation is, theoretically, trying to ensure that ecosystems are sustainable and that we protect public health. Since we can not define sustainability (or health, for that matter) we must use the best scientific predictions of the outcome of altering biological or physical systems and then regulate on that basis.

ONE TOOL: RISK ASSESSMENT

Until now, the best environmental science available has been funneled into risk assessment. The key scientists involved have been toxicologists, chemists and statisticians. Risk assessment has allowed us to predict some outcomes, particularly cancer, when introducing new elements into the environment. It has also helped prioritize what we should clean up first in the case of Superfund sites and some of the large messes created by the Department of Energy. It has not proven, however, to be failsafe.

The reason risk assessment has not been failsafe is that it asks if the possibility of damage to the environment and public health is sufficiently large to warrant government intervention. Paraphrased, risk assessment and risk characterization ask "what can we get away with? How elastic is the environment? How much harm can we tolerate. Whether damage is sufficiently large to regulate is a matter of judgment and ethics, not a matter of science. For the most part, we manage risk rather than act on the precautionary principle and prevent risk.

For example, we have an extensive amount of information about the harm lead, CFCs or DDT causes. But we have never outright banned all manufacture and uses of lead, CFCs or DDT. No matter how much we know about the risks attending a process, chemical or technology, no matter how many fatalities or biospheric disruption might be caused, we do not ban them.

THE BOX CONTAINING THE TOOL: THE INDUSTRIAL MODEL

The industrial model is constructed on the presumption that nature functions like a machine and that humanity's role is to force nature's gears. It uses the metaphor of the Model T Ford Factory that makes mass produced commodities.4 Competition is the primary economic and scientific process in the industrial model: species compete in an ecology and nations compete through their corporations in the global market.

For many, it is difficult to see how we might clothe, feed and shelter ourselves without dominating nature. And for farmers and others who produce our food, it does seem as if the only way to feed the world is to conquer and subdue nature for the benefit of an increasing population of

humans - to mass-produce a homogeneous commodity. This kind of production ethic is in fact an ethic: it is a definition of what is good.

The industrial model operates under the assumptions that:

1. environmental resources are essentially unlimited.
2. Human creativity through technology trumps ecological limits.
3. The economy is not related to the environment except for the benefits to the environment achieved through competing in the free market.
4. Causality is the key question in the scientific endeavor.
5. Regulation is based on certainty with actions taken on the known, ignoring the unknown.

By some measurements, the industrial model has had incredible successes. It has provided an array of technologies and large financial returns for medicine, agriculture, and information. But it has also caused unexpected and widespread damage to the environmental and public health.5 We are all aware of the litany of environmental problems that include radioactive waste, holes in the ozone layer, endocrine disruption and global warming.

We would submit that risk assessment is the dominant environmental decision-making tool in an industrial model of the world. Because this model favors global economic competitiveness, risk assessment isn't very successful as a tool to protect ecological integrity and public health. While it may be a useful tool for predicting cancer, it is an inept and blunt instrument for novel, cutting-edge technologies or for technologies and processes that have large geographical and temporal reaches. Risk assessments cannot adequately address biospheric implications of chemical mixtures, or new genetically engineered organisms released into the environment, much less global level contaminants. By ignoring the consequences of using the industrial model and risk assessment, we have hot-wired the environment and tried to bypass the rigorous controls nature employs.6

Virgil in the great Homeric poem says it well:

```
To cross the waters forbidden to them to cross.
Audacious at trying out everything, men rush
Headlong into the things that have been forbidden.
Guileful Prometheus audaciously by fraud
Brought fire down to the human race and thus
Brought fever down upon us and disease,
And death that once was slow to come came sooner. (1.3)
```

We doubt that other tools exist within the industrial model that could help prevent this kind of damage. However, an alternative model of the world may provide decision-making tools that serve as a tool, not of commerce, but of biology and life. So we ask the single question: are

there other environmental decision-making tools than the twin tools of risk assessment and cost benefit analysis that would better create the conditions for sustainability? What would that model and those tools look like?

A DIFFERENT TOOLBOX: A BIOSYSTEMS MODEL

We would propose that a biosystems model of the world is an alternative model for providing regulators with decision-making tools that could protect the environment and public health. A biosystems model sees a different role for humanity than one of dominating nature--that of the participant. A biosystems model of the world uses natural systems with their complex, mutually dependent parts, rather than the machine, as its instruction guide.

We acknowledge that environmentallsts have sometimes adopted a stance that seems to prohibit all production because they wanted to preserve wilderness, and endangered species as well as prevent technologies like incinerators. Paul Thompson, in his brilliant book The Spirit of the Soil, calls this a preservationist critique but not an ethic of production: it does not tell us how humans can live in the environment and provide for basic needs.7 In a biosystems model, humans are part of, and dependent on, the web of life instead of dominating it. But there is still room in this model to provide food and clothing for humanity. It will, however require a different ethic than one of producing as much as possible despite the cost or an ethic which excludes humans from the environment.

We propose the following parameters of a biosystems model for purposes of policy and regulation:

1. environmental resources are limited.
2. Humans and the biosphere have evolved together for millions of years.
3. Ecological relationships between species should not be disturbed over large geographies or large time spans.
4. The economy is a subset of the ecological system. It is neither coterminous nor independent.
5. Pattern is the key question of science.
6. Precaution is the basis for regulation

THE MEASURING STICK: AN ECOLOGICAL STANDARD

Creating a standard by which we measure the introduction of a novel technology, chemical, force or process could guide analysis for regulation. Here are three formulations of such a standard.

William McDonough proposes that "everything that is received from the earth can be freely given back without causing harm to any living

system."8

Aldo Leopold said, "[a] thing is right when it tends to preserve the integrity, stability and beauty of the biotic community. It is wrong if it tends otherwise."9

Wes Jackson furthers these notions when he says, "...that nutrient cycles must be closed; that if we introduce into the environment chemicals with which we have not evolved, we must regard them as guilty until proven innocent; that fossil fuels are finite...that all parts are important to the whole and to other parts."10

A NEW SET OF TOOLS: MEETING THE ECOLOGICAL STANDARD

We suggest that there are some important environmental decision-making tools arising out of a biosystems model that would help us meet an ecological standard and further the possibility that we might live in a sustainable world.

The standards give us some parameters to consider when designing tools for environmental decision-making: time, energy flows, space and the relationship between economics and ecology. We will pose a set of decision-making tools after the discussion of each of these parameters.

Time

Constanza defines sustainability as a system that has survived for a specified amount of time. The question is, what time frame is appropriate for sustainability?

We note that risk assessment has used very short time frames to determine potential harm for three reasons: 1) risk assessment uses the very short time frame of business rather than biology (consider the speed at which the stockmarket changes); 2) risk assessment typically focuses on an individual organism rather than on a population, ecosystem, or the biosphere; and 3) because scientific certainty decreases over time.

Evolutionary biology can give us some clues for time frames that might work for analysis and regulation. Consider the four time frames E.O. Wilson describes: biochemical time, organismic time, ecological time, and evolutionary time.11 If we are truly interested in sustainability we must expand our time frames to at least ecological time, if not evolutionary time, because the consequences of introducing a new chemical or technology into the environment can rarely be observed in biochemical or even organismic time. Endocrine disruption and the appearance of damage in later generations demonstrates the need to expand our time frame.

Expanding our time frame has two implications: the first is that to

adequately assess the consequences of introducing some new technology, chemical or process into the environment we need to understand the kind of change that will take place over decades if not centuries. And second, not only do we need to know what kind of change will take place, and how change will take place, but the rate at which change that will take place. Is the rate of change something that is natural in a system? This is a key question for a technology like genetic engineering which dramatically speeds up the rate and kind of change and thus has the capacity, ultimately, to destabilize entire systems.

Question/Decision-making tool:

1. Have we evolved with this chemical, or process?
2. Will this alter relationships for long time spans?
3. Does this accelerate the rate of change beyond the rest of the system's ability to adapt?

Energy Flows

Evolutionary biology and economics, both have developed some tools to track energy flows. Wes Jackson, for instance, has argued that we need to understand the relationship of the photosynthesizers to the concentrators (eg. cows and humans) and that we need to use current energy sources rather than fossil fuels.

Following that kind of logic, Herman Daly suggests that we can measure energy in terms of available stock and flow over time. Hence, solar energy is stock-abundant but flow-limited whereas terrestrial sources of energy are stock-limited but flow-abundant. Peasant societies lived off solar flow whereas industrial societies depend on the limited terrestrial stocks. 12

Some technologies have the capacity to significantly alter energy flows. Rbgh, the recombinant bovine growth hormone which was engineered to increase milk production is an example of a technology which increases the energy flow in a system: cows eat more, produce more milk and more waste.

Question/Decision-making tool:
4. Is this use of energy sustainable over ecologic time, eg. centuries?
5. Does this fundamentally change energy flows in an ecosystem?

Space

Mario Giampietro argues that an analysis of relationships can occur on three levels: the individual, the societal and the biospheric.13 He argues that if we are interested in sustainability we have to at least consider the societal impacts, if not the biospheric implications of a new technology. Risk assessment has focused on the individual impacts and through ecorisk assessment is only beginning now to think in terms of communities and populations of species.

The spatial boundaries for analysis are key: looking only at an individual or single species in a laboratory or single field setting will obscure the key patterns instigated by introduction of a novel organism, chemical or technology. As Richard Levins and Richard Lewontin have argued we must examine the relationship between the part and the whole, acknowledging that the part influences the whole and the whole influences the part.14

Question/Decision-making tool:
6. Can this disrupt patterns of relationships over large spatial reaches?
7. What is the relationship of the change in the part to the whole?

Economics:

Providing for humanity's needs is ultimately an economic endeavor in the present world. It is not possible to assess ecological and public health impacts without measuring the relationship of economics to the ecology. In another one of his graphic descriptions, Wes Jackson says that "[I]f we must as a future necessity recycle essentially all materials and run on sunlight, then our future will depend on accounting as the most important and interesting discipline. Because accountants are students of boundaries, we are talking about educating a generation of students who will know how to set up the books for their ecological community accounting, to use three-dimensional spreadsheets."15

In Herman Daly's new book he says that today's emerging economic paradigm "begins with physical parameters....and inquires how the nonphysical variables of technology, preferences, distribution, and lifestyles can be brought into feasible and just equilibrium with the complex biophysical system of which we are a part."16 The reason the economy is central to environmental decision-making is that the "economy, in its physical dimensions, is an open subsystem of our finite and closed ecosystem, which is both the supplier of its low-entropy raw materials and the recipient of its high-entropy wastes."17 The ecosystem acts as a host for the economy.18

Regulation must moderate the throughputs and the outputs because ecological sustainability is not guaranteed by market forces.

Question/Decision-making tool:
8. Does this promote a closed or open nutrient cycle?
9. Does this technology, chemical, force or process generate an end or side product or waste that can be given back to the earth without causing harm to a living system?

Epilogue

Risk assessment coupled with cost-benefit analysis and peer review has

been associated with sound science under the industrial model in the political world of the early 1990's. By emphasizing certainty, causality and cancer, risk assessment has ignored patterns of interactions and consequences of technological inventions. Theo Colborn's great genius was in seeing the patterns that were not cancer - and discerning a whole taxonomy of problems that fell under the rubric of endocrine disruption.19 We advocate a traditional notion of science which is pattern recognition. The great astronomers and mathematicians sought patterns and then explanations for patterns rather than a linear, repetition which simply evidenced causality. Breakthroughs in the Kuhnian sense of paradigm shifts have been through recognitions of patterns and relationships.

Patterns of disease and environmental disruption must be accounted for by scientists and regulators. It is no longer enough to say that a cancer cluster is just a fluke. Its time regulators included other disciplines in the process. Different patterns will be discernible to evolutionary biologists then are discernible and measureable by toxicologists and statisticians.

We would invite policy makers to consider the questions science must address, how they must be addressed and who must address them if we are going to have a sustainable future. We would submit that the decision making tools posed here, in the hands of scientists trained in life sciences, could serve as an alternative to the failed industrial model of the world and its servant risk assessment. These are just a start. We invite dialogue around these important issues.

In conclusion here is a poem by Patiann Rogers which says it better than all the available science.20

The Family Is All There Is

Think of those old, enduring connections
found in all flesh--the channeling
wires and threads,vacuoles, granules,
plasma and pods, purple veins, ascending
boles and coral sapwood (sugar-
and light-filled), those common ligaments,
filaments, fibers and canals,

Seminal to all kin also is the open
mouth--in sea urchin and octopus belly,
in catfish, moonfish, forest lily,
and rugosa rose, in thirsty magpie,
wailing cat cub, barker, yodeler,
yawning coati.

And there is a pervasive clasping
common to the clan--the hard nails
of lichen and ivy sucker
on the church wall, the bean tendril
and the taproot, the bolted coupling

of crane flies, the hold of the shearwater
on its morning squid, guanine to cytosine,
adenine to thymine,fingers around fingers,
the grip of the voice on presence,
the grasp of the self on place.

Remember the same hair on pygmy
dormouse and yellow-necked caterpillar,
covering red baboon, thistle seed
and willow herb? Remember the similar
snorts of warthog, walrus, male moose
and sumo wrestler? Remember the familiar
whinny and shimmer found in river birches,
bay mares and bullfrog tadpoles,
in children playing at shoulder tag
on a summer lawn?

The family, weavers, reachers, winders
and connivers, pumpers, runners, air
and bubble riders, rock-sitters, wave-gliders,
wire-wobblers, soothers, flagellators--all
brothers, sisters, all there is.

Name something else.

ENDNOTES

1. Constanza, Robert. 1996. Designing Sustainable Ecological Economic Systems. Pp. 79-95 in Engineering Within Ecological Constraints, Schulze, Peter, ed. Washington D.C.: National Academy Press.

2. Jackson, Wes. 1994. Becoming Native to This Place. Pp. 51 The University of Kentucky Press, Lexington.

3. Kirschenmann, Frederick. 1995. Sustainable Agriculture. Paper given at Accokeek Foundation, Maryland. See also Meadows, Meadows and Rander. 1992. Beyond the Limits. Chelsea Green Publishing Co. Post Mills, Vt.

4. Flora, Cornelia. 1995. The Sustainable Agriculturalist and the New Economy. In Energy and Sustainable Agriculture Program, Minn. Dept. Of Agriculture, Minn.

5. Jackson, Wes. 1994. Becoming Native to This Place. Pp.103 The University of Kentucky Press, Lexington.

6. Jackson, Wes. 1994. Becoming Native to This Place. Pp.103 The University of Kentucky Press, Lexington.

7. Thompson, Paul. 1995. The Spirit of the Soil. Pp. 11. Routledge, N.Y.

8. McDonough, William. 1996. Design, Ecology, Ethics, and the Making of Things. In Lapis, Pp. 71 Issue #3.

9. Leopold, Aldo. 1966. A Sand County Almanac. Pp. 262. Oxford University Press.

10. Jackson, Wes. 1994. Becoming Native to This Place. Pp.103 The University of Kentucky Press, Lexington.

11. Wilson, E.O. 1984. Biophilia. Pp. 39-45. Harvard University Press, Cambridge, Mass.

12. Daly, Herman E. 1996 Beyond Growth: The Economics of Sustainable Development. Pp. 30 Beacon Press, Boston.

13. Giampietro, Mario. 1994. "Sustainability and Technological Development in Agriculture A Critical Appraisal of Genetic Engineering." In Bioscience, Journal of the American Institute of Biological Sciences. Nov. 1994 Vol. 44 No. 10. p. 684.

14. Levins, Richard and Lewontin, Richard. 1985. The Dialectical Biologist. Pp. 152-160. Harvard University Press, Cambridge Mass. See also Jackson, Wes. 1994. Becoming Native to This Place. Pp. 19-20 The University of Kentucky Press, Lexington.

15. Jackson, Wes. 1994. Becoming Native to This Place. Pp.99 The University of Kentucky Press, Lexington.

16. Daly, Herman E. 1996 Beyond Growth: The Economics of Sustainable Development. Pp. 4 Beacon Press, Boston.

17. Daly, Herman E. 1996 Beyond Growth: The Economics of Sustainable Development. Pp.33 Beacon Press, Boston.

18. Daly, Herman E. 1996 Beyond Growth: The Economics of Sustainable Development. Pp.33 Beacon Press, Boston.

19. Colborn, Theo, Dumanoski, Diane and Myers, John Peterson. 1996 Our Stolen Future. Dutton Books, NY.

20. Rogers, Pattiann. 1994 . Firekeeper: New and Selected Poems.: Milkweed Editions, Minnesota.

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Concept Paper

Building a Sustainable Development Infrastructure

by Gary O'Neal
EPA Region 10 2/9/93

Many of the areas in the country are still in the beginning stages of a fundamental transition in both the economic and environmental areas. This transition involves the shift from a consumption and growth-oriented focus based on assumptions of unlimited resources and environmental support capacity to one that focuses on forms of development sustainable over the long-term, conservation and reuse of resources, etc. This "paradigm shift" will be very difficult and may well take decades to occur in terms of comprehensive adoption and implementation.

When viewed from the perspective of the broad goal of environmental protection, the potential benefits of this shift are tremendous. It is, in one sense, the ultimate pollution/environmental degradation prevention program. The challenge is to determine how to best facilitate and enable this transition, both in the ways legislatively mandated environmental programs are implemented, and in finding creative ways for a broad array of public and private interests to work constructively together toward the common goal of sustainability. What sort of "infrastructure" of information, skills, programs, etc. are needed to meet this challenge? This paper suggests a framework for a sustainability infrastructure of this type. The availability of such a framework would enhance the capabilities of state and local government and the private sector to address sustainability issues. An initiative in this area could be developed and implemented at any level from national to local.

The changes required to shift to a more sustainable mode of operation are many and far-reaching in their implications. The issues surrounding these changes are very complex, involving a spectrum of considerations from social, cultural, and economic dynamics to hard science. To enable groups at all levels to more effectively address these elements, there is a growing need for a wide variety of skills and tools that are not now readily available. The goals of this initiative would be to better define these sustainability infrastructure needs and begin to develop both the tools and the delivery mechanisms. Success will require extensive coordination among government agencies at all levels and a strong emphasis on a public / private partnership approach.

To effectively address a problem of this scope, even at the regional or local scale, requires a clear sense of direction and a framework for focusing efforts and setting priorities. A series of modules are outlined below which do three things. First, they define in a preliminary way the scope of what will be needed to address infrastructure development needs over a multiple-year time period. Second, they break the problem down into pieces

which facilitate identification of who might be involved in working together on that module. Third, and perhaps of most importance in the initial stages, they provide a basis for beginning to set priorities depending on available resources, agency commitments, etc. Sustainable Development Infrastructure Modules following is a preliminary list of infrastructure modules with general indications of scope and types of issues that need to be addressed. The specifics on development and implementation for any of these modules would be established through a cooperative approach involving appropriate state, federal, and local agencies, business and academic interests, and the public.

Sustainable Development Infrastructure models

Following is a preliminary list of infrastructure modules with general indications of scope and types of issues that need to be addressed. The specifics on development and implementation for any of these modules would be established through a cooperative approach involving appropriate state, federal, and local agencies, business and academic interests, and the public.

Environmental Education - One focus would be on strengthening the environmental education programs in school systems. This would include, for the geographic area of concern, incorporation of specific information on sustainability issues and knowledge about economic and environmental/ecological values of natural resource systems. A parallel effort would be developed to enhance education in these areas for business and government staff and managers.

Indicators - There is a need for development of a commonly accepted set of economic and environmental sustainability indicators to aid in measuring progress and informing the public and decision-makers. Different groups, locally, regionally and nationally, are grappling with this problem. Work in this module would bring together current information in this area and facilitate discussions/information sharing. The goals of this effort would be to enhance the knowledge of possible measures throughout the government and business communities and see if it is possible to reach consensus on a core set of indicators.

Forecasting - An increased emphasis on sustainability will require improved quality and availability of forecasts of environmental quality, changing demographics, economic trends, public values, etc. Currently forecasting that is done in these areas is often fragmented and not well - coordinated within categories. It is also certainly not integrated into a comprehensive set of information on possible future scenarios that is readily available to state and local government decision makers, the business community and the public. The goals of work in this module would first be to identify both current forecasting programs and the types of forecasts of most use to decision makers in addressing sustainability-related questions. From this information, an agenda for enhancing the quality and availability of forecasts in the area(s) would be developed and implemented.

Analysis - Governments at all levels and businesses of all sizes need improved abilities to analyze their ideas and decisions in terms of potential impacts on environmental and ecological sustainability. There is a need to identify what tools (models, data bases, accounting systems, information systems, etc.) and related training are needed to enhance capabilities in this area. There is also a need to identify the priority issues which need comprehensive research and analysis(social science, technical, policy, etc.). From this list

a comprehensive research and analysis agenda with both public and private support can be developed This module would focus on conducting these assessments and then developing and implementing programs to both develop the analytical tools and conduct the needed research.

Information Transfer - At present, those that are working to increase the focus on sustainability, whether in government, business, academia, or in other groups, are frequently working in relative isolation. Current opportunities for sharing approaches , finding out about program modules that are working (and those that are not), what peers in other government or business organizations are doing, etc. are both limited and their availability not well-known. Work within this module would focus on the creation and the facilitation of information transfer opportunities. It would involve application of traditional approaches such as conferences, workshops, etc. as well as exploring establishment of peer "circuit rider" programs and the use of computerized bulletin boards to enhance networking and quick information sharing. There would also be a strong public information/participation component to the program developed under this module.

Pollution Prevention - A strong and comprehensive emphasis on pollution prevention is an essential component of moving toward sustainability. Currently there is a basic framework of state pollution prevention programs in place. Work in this module would continue to enhance program development and information transfer in this area. In addition the scope of efforts would be broadened to strengthen understanding and application of concepts like Design for the Environment and to build a stronger pollution prevention ethic into government agencies and the private sector at all levels.

Resource conservation - Effective conservation of both natural and man-made resources and materials is an essential element of any approach to sustainability. The linkages between resource conservation and long-term economic profitability and environmental protection are becoming ever more clear. Work on this module would identify, for the area under consideration, the primary conservation issues and opportunities. The various agencies and organizations involved in promoting conservation through education, technical assistance, etc. would also be identifies. Building on these current needs and conservation programs, improved coordination and program delivery approaches would be developed.

Support from Academic Institutions - The training and research skills available at public and private academic institutions area another vital resource which needs to be applied to strengthening the sustainable development infrastructure. Much good work is currently being done by these institutions that applies but there is also much untapped potential. Development of future leaders necessary to address this challenge requires that sustainable development concepts and issues be integrated into curricula in many diverse fields. The academic institutions of the area, both individually and working cooperatively together, need to explore ways to meet training needs of both new students and of current government and business leaders in this area. A priority research agenda to support movement toward sustainability needs to be developed and implemented. The work under this module will be a long-term effort to identify where the academic institutions can provide support and direction and then finding ways to make it happen.

The framework of modules outlined above may well not be complete at this point since

thinking on how to address sustainability issues is evolving at all levels. Many of the suggested work elements are complementary to those in other modules and the needs and relationships will change as work progresses. For these reasons, the proposed infrastructure framework would be considered dynamic and something that will evolve and be refined over time.

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by
Jane Silberstein and Chris Maser

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http://www.chrismaser.com/bk-lup.htm 10/28/02

Focus on Livable Communities:

New Thinking for a New Transportation Age

This fact sheet highlights five principles of the "New Transportation Age." These principles derive from research and cutting-edge thinking that is often surprising and counterintuitive in that it contradicts many of the axioms of the post war era of automobile-oriented transportation engineering and planning.

Hallmarks of this shift include engineers reevaluating the approach they use to define and solve problems. For instance, many are now questioning the high value placed on moving vehicle traffic if it comes at the expense of other transportation and community goals. Is it acceptable to increase traffic flow through urban neighborhoods and commercial districts if that reduces pedestrian mobility and degrades community livability? Is it such a good idea to add highway capacity if it exacerbates urban sprawl and does little to reduce congestion? As noted transportation planner and researcher Reid Ewing, of Rutgers University, points out, transportation and traffic engineering leaders are now creating more accessible, multi-modal communities with diverse travel options – communities where the need to travel is reduced.

You can view and download the Fact Sheet (PDF, 692 KB).
For more information, call the Local Government Commission at 916-448-1198, or 1-800-290-8202.

See below for more resources on principles highlighted in the fact sheet.

Resources on Information in Fact Sheet Introduction:

- Reid Ewing, *Performance Standards for Growth Management*, edited by Douglas Porter, American Planning Association, Planning Advisory Service Report Number 461 http://www.planning.org/bookstore/screen3.asp
- Walter Kulash, "The Third Motor Age," *Places* 10.2 (Winter 1996) pp. 42-49, Environmental Design Research Association (EDRA)
- Reid Ewing, *Best Development Practices: Doing the Right Thing and Making Money at the Same Time*, Planners Press (Chicago; http://www.planning.org), 1996.
- Todd Litman, "Reinventing Transportation: Exploring the Paradigm Shift Needed to Reconcile Sustainability and Transportation Objectives," *Transportation Research Record 1670*, Transportation Research Board (http://www.nas.edu/trb), 1999, pp. 8-12; available at http://www.vtpi.org.

- Barbara McCann, *Driven to Spend; The Impact of Sprawl on Household Transportation Expenses*, STPP (http://www.transact.org), 2000.
- Harrison Bright Rue, *Real Towns: Making Your Neighborhood Work*, Local Government Commission (http://www.lgc.org) and Citizen Planner Institute (http://www.citizenplanner.com), 2000.
- VTPI, *Online TDM Encyclopedia*, Victoria Transport Policy Institute (http://www.vtpi.org), 2000.

More and Wider Roads Create More Traffic:

- Mark Hansen, Yuanlin Huang, "Road Supply and Traffic in California Urban Areas," *Transportation Research*, A, Vol. 31, No. 3 pp. 205-218, 1997. (PDF, 872 KB) Cited in Fact Sheet
- Lewis Fulton, Robert Noland, "A Statistical Analysis of Induced Travel Effects in the US Mid-Atlantic Region," April 2000, *Journal of Transportation and Statistics*. (PDF, 60 KB) Cited in Fact Sheet
- *Why are the Roads So Congested? A Companion Analysis of the Texas Transportation Institute's Data On Metropolitan Congestion*, Surface Transportation Policy Project, November, 1999, http://www.transact.org/ (see Reports & Resources section)
- *Road Work Ahead! Is Construction Worth the Wait?* Four case studies on the true costs and benefits of road construction projects. http://www.transact.org/ (see Reports & Resources section)
- Mark Hansen, "Do New Highways Generate Traffic?" *Access*, University of California Transportation Center, Fall 1995.
- Kevin Heanue, "Highway Capacity Expansion and Induced Travel: Evidence and Implications," Circular #481, Transportation Research Board (Washington, DC; February 1998
- Patrick De Corla-Souza and Harry Cohen, *Accounting for Induced Travel in Evaluation of Urban Highway Expansion*, FHWA, 1998
- Todd Litman, "Generated Traffic: Implications for Transport Planning," *ITE Journal*, Vol. 71, No. 4, Institute of Transportation Engineers (http://www.ite.org), April, 2001, pp. 38-47; also available at Victoria Transport Policy Institute (http://www.vtpi.org).
- Sierra Club: http://www.sierraclub.org/sprawl/transportation

Good Health and Transportation

- Active Community Environments Web site, US Centers for Disease Control and Prevention: http://www.cdc.gov/nccdphp/dnpa/aces.htm.
- "Active Community Environments" brochure from US Department of Health and Human Services. (PDF, 76 KB)

Walking is Transportation

- James Corless, Sharon Sprowls, *Beyond Gridlock*, Surface Transportation Policy Project, May 2000, available at http://www.transact.org/CA/.

Beware of Biased Language

- City of West Palm Beach language policy, a memo from the City Manager. (PDF, 28 KB)

This project is funded by the Physical Activity and Health Initiative, California Department of Health Services under a Preventive Health Services Block Grant from the US Centers for Disease Control and Prevention. Work performed as part of a UC San Francisco contract.

PUBLIC HEARING COMMENTS

State Representative Jonathan Weinzapfel... Thank you, it's good to see everyone here this evening. My name is Jonathan Weinzapfel, I'm here as State Representative in district 76 and I also serve as President of the Southwestern Indiana Regional Development Commission. That is a commission in which and where Posey, Vanderburgh, Warrick and Gibson Counties have come together to try to work in a regional fashion on economic development and quality of life issues. I believe there are three main reasons on why we need to build a direct route now. The first of course is the assistance we will get to our economic development and job creation efforts. First as Representative Becker mentioned, when businesses are looking to expand or relocate they are going to look for interstate highway accessibility, that's one of the many factors they look to. The other of course is the fact that this interstate would connect the entire North American continent and serve as a tremendous trade corridor providing additional numerous economic development opportunities. The second is travel safety and time savings. Anyone who has traveled between Evansville and Bloomington along State Road 57 or which ever of the numerous routes you take or along US 41 to 70 to Indianapolis, understands how difficult and treacherous those roads can be. In addition we are also looking at savings of approximately 30 minutes with a direct route. These are important considerations in this project. The third is probably the most important is that this highway is going to serve to bridge the social and political environment that exists between Southwestern Indiana and Indianapolis and the rest of the state. We have felt like an isolated community down here in Southwestern Indiana for to long. We need to build this direct route to make sure that we are united as Hoosiers and as a state. Thank you. 2.3.1

0821-193 Weinzapfel, Jonathan.wpd

S.I.B.A., Inc.
Southern Indiana Business Alliance
P.O. Box 1968, Bloomington, IN 47402-1968
(812) 336-7576 dmreece@tsc.com

October 25, 2002

J. Bryan Nicol, Commissioner
Indiana Department of Transportation
100 N. Senate Ave.
Room IGCN 755
Indianapolis, IN 46204

Dear Commissioner Nicol:

Last year representatives of S.I.B.A. met with you, Tom McKenna, former Governor Bob Orr, and others to discuss NSWC Crane's critical importance to Indiana's economy. We have continued to work hard to educate the citizens of this part of Indiana concerning Crane's impact on our communities.

As you know, S.I.B.A. has two major missions: to leverage the economic engine that Crane represents, and to protect the base from the 2005 base realignment and closure (BRAC) round. It is crucial that Crane have reasonable access to I-69 if we are to reach these goals. Dave Reece successfully led Crane's efforts against the previous rounds as Crane's senior civilian. Now this seasoned BRAC veteran is S.I.B.A.'s executive director, and he makes it very clear that good access to I-69 increases Crane's mission effectiveness and its military value, thereby strengthening its position in the BRAC process. From your recent comments, it appears you, too, believe Crane access is an important factor in selecting a route. 2.3.2 3.4.2

We realize you must consider many complex issues, but we strongly support building I-69 in close proximity to NSWC Crane. Having such a major artery nearby would strengthen Crane's future, and by extension, our economy.

Sincerely,

James E. Shelton
President
Southern Indiana Business Alliance

1025-040

* J. Shelton, President * S. Howard, Vice President * S. Gootee, Secretary-Treasurer * D. Reece, Executive Director * P. Tedesco *

Dear Governor O'Bannon,

Please accept this as my heartfelt and considered thoughts on the I-69 proposal. Although economic development is a major concern for most Hoosiers the evidence does not support the current proposal. For example, we already have a segment of I-69 (from Indianapolis ~~East~~ northeast, yet no economic development has occurred along 2.3.2 this route. Similarly the I-64 segment through Southern Indiana has produced no economic development since its construction. What makes anyone believe that a new segment will seriously change this? Meanwhile, a new terrain highway will destroy family farms that are also part of Hoosier legacy, and fragment many eco-systems, disturb wetlands, and decrease the biodiversity in Indiana. Is this the sort of legacy you wish to leave? Please make a responsible decision one not based on economic and political pressure of the minority who will benefit

1017-019

Subj: DEIS Comments
Date: 8/29/02 5:15:22 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Jeff Jordan
Address = 11633 Tepe Road
City = Haubstadt
State = IN
ZIP = 47639
Email = jordanjv@evansville.net
Message = Using INDOT's numbers the total distance savings is only 16 miles maximum for the shortest route verses the longest route. The total round trip time savings maximum between Evansville and Indianapolis is only 27 minutes (13.5 one way). I do not understand why the State needs to aquire all the new land to build a new route for such insignificant improvement. If a new route is built US 41 will still require rebuilding. The state has allowed curb cuts to go in willy nilly with no thought to expansion. I do not understand why they can not improve US 41 since they already have most of the needed right of way, plus it is already a four lane divided highway with bridges over waterways in place. It also takes advantage of the existing US 70 which is already up to standards, and should not be calculated into the construction costs.

I also worry about the immediate economic impact of bypassing those cities relient on the traffic of US 41. To cut these cities off would be like the railroad cutting off towns in the 1870's-80's. These towns stand to lose more than any small town such as Petersburg would gain. I also know that gaining new right of ways creates a massive number of lawsuits, not to mention the Indian Mounds and burial sites that I know lie in the path of routes 3,4,&5 in the Gibson County area.

The "build it and they will come" mentallity falls short of historic fact. Take for example the stagnant growth along Interstate 64. Other than gas stations there isn't any new businesses outside of the St. Louis and Louisville metro area. The same can be said of Interstate 70, or the Pennyrille in Kentucky. If you study the numbers high speed interstates generally harm small communities, and inhibit growth. 2.3.2

The enviromental impact is too great for a new route that provides so little benefit. I do not think that 13.5 minutes is worth a increase in my taxes. I do not think that 16 miles is worth an increase in my taxes. I do not believe that the increase in the state's cost to maitain a new highway is worth the insignificant improvements. Please no new routes, it just makes no sense.

0829-006 Jordan, Jeff.wpd

PUBLIC HEARING COMMENTS

Vaneta Becker... Good evening, thank you very much for being here. I'm State Representative Vaneta Becker and I appreciate the opportunity. I said I expected it to be butchered because it is a lot. I appreciate the chance to address you. The time to develop I-69 is now. The time for studies are over, we need to proceed and move forward. I co-charity I-69 legislative Kuakas in the Indiana General Assembly and there is broad State wide support for this highway. We need it not only because it is the missing spoke in our highway transportation system that should connect Evansville, the third largest city in the State of Indiana but we also need it for job opportunities for our young people. We need it for safety, if any one of you have driven the highway high, highway 41 to Indianapolis; you know how unsafe it is. And we need to provide more job opportunities. All of the studies on economic development show us that the largest and the most building of economic development, most new businesses locate either on an interstate or within ten miles of an interstate. 2.3.2 So this highway, a direct route will open up all kinds of economic development opportunities for a lot of small towns between Evansville and Indianapolis, and it is critical. I know I served in the General Assembly since 1981 and I can tell you that I've been hearing about this highway for many, many years and have been an advocate all that time. Evan Bayh, when he was Governor said that this will be build before I leave office, and it's now 14 years since he took office and we still have not dug concrete. So let's build it now and move forward, thank you.

0821-189 Becker, Vaneta.wpd

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

I live two miles off SR 45 between junctions SR 58 & SR 54. I drive to Knox County frequently using a variety of routes. The scenery is lovely to say the least — I love it. I can't see no reason to construct a new highway through new land. If you want to help the economy of Greene Cty — use existing Hwy 67 that travels Bloomfield & Linton — upgrade the road for economic development. If not that route, the logical route would be Hwy 41 to Interstate 70 @ Terre Haute. The Navy's installation @ Crane should stay a low-key location. Don't promote our defense research locations with easy interstate access route in today's climate of terrorism.

There are no down-to-dusk lights in my view at night I can enjoy. God's heaven by stars and the Milky Way at a level that urbanites don't have. I moved here specifically for that experience as did many who like me. Please consider existing road routes over new terrain construction. 2.3.2

Name Kathleen Henis

Address RR #3 Box 303-36B

City/State/Zip Bloomfield, IN 47424

RECEIVED
OCT 7 4 2002
SLA

1024-039

Subj: DEIS comments
Date: 11/7/02 2:19:24 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Cheryl
LastName = Jenness
StreetAddress = RR1Box 291A
Address =
City = Solsberry
State = IN
ZipCode = 47459
Email = rcjenness@direcway.com
Comments = I am opposed to having a highway go through Greene county for the following reasons:

1. We moved here from Seattle, WA looking for a rural area. With this highway we believe that there would be more traffic on our rural areas putting our children in more danger. Especially since one of the alternatives is very close to Eastern school district, where my children attend school. We did not want to live near any major highways as we had already done that and had grown tired of the traffic and noise.

2. Historical places, ie cemeteries and buildings, need to be protected and saved. The history and hard work of the people before us is a great legacy that we can pass on to our children. To lose these places would be a great sadness to those who respect their ancestors and who need these places to learn about their heritage.

3. We travel to Indianapolis almost every week to take my husband to the airport. We do not see much traffic on highway 67 or 37. We could understand if there were backups continuously along either route then a new highway would be needed. But since we do not see this then why the new highway when there is not enough traffic to fill up the highways we have now.

4. To build a new highway system when it's not needed is a waste of money. Especially since that money is needed to repair the roads that we have now. It would be better to upgrade an already existing system than to add a brand new one.

5. I would be very uncomfortable having a major highway passing closely to Crane Naval Base. I have children that play on the football field there. When 9/11 happened last year they were not allowed to play on that field for a couple of weeks because of a possible terrorist attack. Would my children be safe if a major NAFTA highway was close to Crane? 2.3.2

Having friends who have worked hard to build a house and a future for their families, it would be hard to watch them lose those things that they have worked so hard for, just for the convenience of businesses in Evansville and Indianapolis.

Thank you for allowing me to give my opinion.

Cheryl L. Jenness

1107-072 Jenness, Cheryl.wpd

RECEIVED NOV 1 [illegible] 2002

The City Of Loogootee

401 J.F.K. AVE.
Loogootee, IN 47553

Office 812-295-4770
Fax 812-295-2859

Office Of The Mayor
Brian T. Ader

November 8, 2002

J. Bryan Nicol
Commissioner
Indiana Department of Transportation
100 N. Senate Avenue, Room N755
Indianapolis, IN 46204-2228

Dear J. Bryan Nicol:

Enclosed are my comments regarding I-69, & original copies of resolutions signed by City of Loogootee Council Members, Clerk-Treasurer & Mayor.

Sincerely,

Brian T. Ader, Mayor

BTA/nkp

1106-146

The City Of Loogootee

401 J.F.K. AVE.
Loogootee, IN 47553

Office 812-295-4770
Fax 812-295-2859

Office Of The Mayor
Brian T. Ader

November 6, 2002

J. Bryan Nicol
Commissioner
Indiana Department of Transportation
100 N. Senate Avenue, Room N755
Indianapolis, IN 46204-2228

Dear Commissioner Nicol:

I want to applaud you and INDOT'S effort in keeping I-69 in the fore front as a much-needed interstate for the Southwestern part of the State. In the most recent release of the DBIS (Draft Environmental Impact Study) for I-69, it has one route (alternate 5) which runs through Loogootee over to Hwy 37 onto Indianapolis. There are also two or three routes (alternate 3) that run to west of us around Washington then up towards Crane, IN then onto Indianapolis. Within the DEIS it explains pros and cons of all the routes, and has some very interesting maps and explains the rational for its conclusions. I don't understand every detail in the report, however I do understand:

1. Martin County is one of the poorest counties in the state since we don't have a large tax base due to inaccessibility or lack interstate highway. 2.3.2
2. Martin County is home to the Crane Naval Base (Naval Surface Warfare Center), which employs over 3500 people and will be involved in the next round of BRAC (Base Realignment And Closure).
3. We are in the process of trying to develop an industrial or technical park outside the base in the North Crane area to support Crane.
4. Although Crane provides good paying jobs, Martin County doesn't receive any property taxes from the land it is located on (100 sq. miles).
5. Martin County is also home to the Hoosier National Forest (around 53,000 acres) which we don't receive any tax dollars for either.
6. Loogootee has two major highways (US 50& US 231), which intersect, within the city (note: Hwy 50 is alternate route 5).
7. West Boggs Park is a 600-acre lake located 4 miles north of Loogootee (this is a joint park between Martin and Daviess County).
8. Martin County has a lot to offer its citizens and we have many of the ingredients to grow but what we're lacking is access to an interstate.

Crane accounts for several hundred jobs as well as several millions of dollars in wages for Martin County. I feel that if Martin County and Crane had access to a major interstate we would have several industrial parks established and we would be able connect with other industries easier. By not having a major interstate our county, cities, and towns will never know what opportunities they have missed since most companies will not look at an area without an interstate access. However, we are fortunate to have what little industry we have and an interstate will help them achieve an even higher level of success. Martin County has hundreds of tractor-trailer rigs that travel through it each and every day hauling rock, sand, coal, grain, etc. by having an interstate this will allow safer travel. 2.3.2

In conclusion, I feel we are fortunate but I have seen what other communities have achieved by having access to an interstate. As mayor I am trying to set the stage that allows the

opportunity for economical development to find Martin County. We need a North and South route, which is safer to travel on, as well as a safer East and West highway. By having access to an interstate this will reverse the isolation from the outside regions, which keeps us from growing and developing economically. By having a major interstate, we can develop an expanded tax base to allow investments in historic and environmental preservation. This interstate should be built so our children, grandchildren, and those of us that are still around can reap the benefits from it. It is my understanding that I-64 originally was intended to go where US 50 is now. I believe if I-64 had been built along US 50,we would have that growth especially with US 231 crossing it. The City of Loogootee adopted a resolution November 13, 2001 in favor of Route #5. Since then, to show unity with the surrounding region, the City of Loogootee passed another resolution on November 6, 2002, in favor of Route #3. Both these resolution are being sent with this letter.

Sincerely,

Brian T. Ader, Mayor
City of Loogootee

CITY OF LOOGOOTEE, INDIANA
RESOLUTION 2001-26

Whereas, the State of Indiana, thru its Department of Transportation and State Highway Commission is contemplating contraction of I-69, to serve and provide better transportation route and access to this portion of Southern Indiana, and, Whereas, the location thereof along alternate Route #5 would make the best access and shortest and most convenient route thereof, to so serve said area and the NWSC, Crane, Indiana, and the resident and users in and around the City of Loogootee, Indiana, NOW, THEREFORE, it is hereby RESOLVED:

That said city and its officials do hereby now so RESOLVE and RECOMMEND to BUILT, CONTRUCTED and LAID OUT ALL, along and upon said route #5 thereof, as now so proposed, to thus provide the best, most convenient most economical and shortest direct route thereof, as all as have been now proposed.

BE IT FUTHER RESOLVED: That a copy hereof as duly signed by said City Officials, and authenticated by the Clerk Treasurer hereof, be promptly sent said Highway Commission, forthwith.

BE IT SO RESOLVED, BY SAID CITY, this 13 day of November, 2001, at 7:00 p.m.

Alfred Inman, Council Member

Betty Summers, Council Member

Richard Taylor, Council Member

James R. Taylor, Council Member

John R. Hunt, Council Member

DULY ACCEPTED AND INDORSED BY ME, ON: November 13, 2001.

Brian T. Ader, Mayor

Attest:

Bettey Norris, Clerk-Treasurer

RESOLUTION

A Resolution of The City of Loogootee
Along Alternate 3 of the I-69 Proposed Route Map

WHEREAS, The Indiana Department of Transportation (INDOT) has found it to be in the best interest of all residents of the State of Indiana to construct I-69 south of Indianapolis to and through the southwestern part of the state; and

WHEREAS, INDOT has proposed several options and has held public hearings to receive public input with regards to options; and

WHEREAS, The construction of I-69 will enhance all aspects of transportation in the State of Indiana including allowing for an increase in the trade of goods, safety, and economic development; and

WHEREAS, The City of Loogootee Officials support Alternate 3 of the I-69 Proposed Route Map has reviewed the possible route options and finds that one option would better serve those cities and areas.

Now, therefore be it resolved by the City of Loogootee Officials support Alternate 3 of the I-69 Proposed Route Map as follows:

Section I. That Alternative 3 as shown on the Proposed Route map is the route that will have the greatest positive influence on increasing the safety of travel and providing for continued economic development in Martin County, Crane Naval Base, along Alternate 3. That a copy of the Proposed Route Map is attached hereto as Exhibit "A".

Section II. That those areas set out in Section I fully endorse and support Alternate 3 and find it to be in the best interest of those respective citizens.

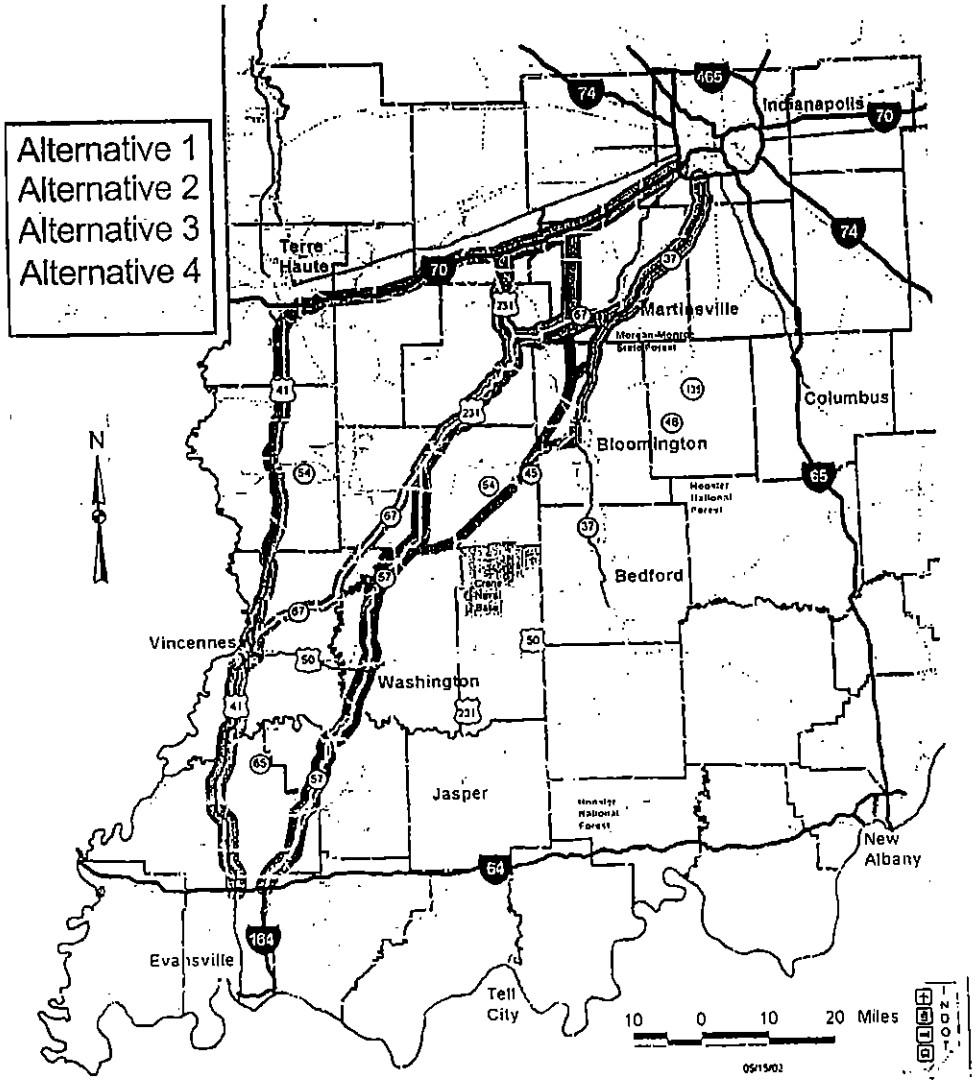
Section III. This Resolution shall be in full force and effect from and of its date of adoption.

Passed and adopted this 6 day of November 2002.

City of Loogootee
Mayor

City of Loogootee
Clerk/Treasurer
Bettye Norris

City of Loogootee
Council Members



Subj: New I-69 Study Form Feedback
Date: 11/7/02 11:11:38 AM EST
From: pmcfeaters@usg.com (Paul McFeaters)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Paul McFeaters
PO Box 360
Loogootee, IN 47553-0360

Message:
Dear Sir,

As you can imagine, we in Martin County have been very attentive to the process of I-69 proposed route determination. Alternative 5 runs east-west through the heart of Martin County. Alternative 3 runs very near the northwest corner of the Naval Surface Warfare Center at Crane.

I want to go on record as fully supporting Alternative 3. I am very much opposed to Alternative 1.

My fellow County Commissioners and our constituents strongly believe the I-70/US 41 alternative does nothing more than maintain the status quo of transportation in southwest Indiana, particularly Martin County.. The status quo in Martin County means no population growth since the 1940's, no significant private sector investment since 1965, job creation that lags far behind the state average, and a tax base that is not keeping up with increases in the cost of providing government services. We are convinced that a root cause of our economic stagnation is the lack of convenient access to the nation's high-speed highway network. 2.3.2

This is such an extraordinarily important decision for our state's future. Martin County residents believe the upcoming decision is our only hope to build the much-needed economic lifeline to the part of Indiana currently burdened with the slowest and least safe transportation system. That's why we are very much in favor of Alternative 3.

I respectfully ask INDOT to join me in listening to the voices calling for the new terrain route that will allow southwest Indiana's neglected small towns and rural communities to compete economically with the rest of the State.

Sincerely yours,

Paul McFeaters
Martin County Commissioner, District 3

1107-419 McFeaters, Paul.wpd

PUBLIC HEARING COMMENTS

Paul McFeaters... Good evening ladies and gentlemen. I'm Paul McFeaters I'm here tonight to represent my constituents in Martin County as their elected County Commissioner. Let me tell you something about Martin County, in the 1990's the population of the State of Indiana grew 9.7 percent; the population of Martin County did not grow at all. During the same time the crime rate, non farm employment rose 20 percent in Indiana versus only 5.9 percent in Martin County. Most tragically there has bee no significant private sector investment in Martin County since 1965. Now my constituents believe that a root cause of our economic stagnation is our isolation from high speed transportation networks. The average person in Martin County lives no closer than 40 miles to the interstate or a limited access highway. Martin County is also the home of the Crane Navel Surface Warfare Center, one of the largest high-tech employers in the State of Indiana. It is also the home to the largest concentration of Gypsum board manufacturing in the Ohio Valley and the Great Lakes Region. We believe that the long term competitiveness of both the Crane Navel Surface Warfare Center and our Gypsum Industry is dependant on access to an interstate highway. We strongly support alternative number three. Throw Martin County an economic lifeline, build the highway, alternative number three. Thank you. 2.3.2 2.3.2

0821-187 McFeaters, Paul.wpd

August 21, 2002

Indiana Department of Transportation:

I appreciate the opportunity to express my opinion on the draft impact study for the proposed extension of Interstate 69.

As a member of the Vanderburgh County Council, I fully support a new terrain extension of the Interstate to pass through the Evansville area.

I applaud the core goals identified by INDOT. Those goals crystallize "the Evansville perspective" on this important, and overdue, highway project.

In working with our economic development agency, Vision 2000, in recent years, it is obvious that our region of the state is at a competitive disadvantage when attempting to attract new industry. Companies seeking new plant sites are eager to learn of Evansville's access to Indianapolis and points north. Without such a direct connection, re-location consultants are quick to dismiss our area as a potential home for industry. 2.3.2

With our economy becoming more and more global, it is becoming increasingly important for Evansville area businesses to have more efficient transportation options. A new terrain route will clearly improve our collective ability to transport goods intended for international use.

The third core value is probably the one with which most people can most easily identify: travel timesavings. For most of my adult life I have heard Evansville area residents complain about being "cut-off" from the rest of the state. A direct route to Indianapolis will be a time saver and frankly make area residents feel more like Hoosiers. For decades, we have witnessed millions of dollars appropriated for Central Indiana projects because that's where the circle of power is located. It is time for the circle of power to recognize that residents of Evansville and Southwest Indiana should no longer be forgotten. Our region will prosper with a new terrain highway, and if we prosper more, so will the entire state.

Thank you for your consideration.

Sincerely,

Lloyd W. Winnecke
Vanderburgh County Council, District 4

0821-295

Subj: DEIS comments
Date: 11/7/02 10:27:28 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Daniel
LastName = Ingram
StreetAddress = 1034 Greer Lane
Address =
City = Springville
State = IN
ZipCode = 47462
Email = papaw_grammy@hotmail.com
Comments = I think I-69 should use as much of SR37 as possible, preferably all the way to Bedford. The economic benefits to southern Indiana are needed badly. Many of the counties with the highest unemployment numbers are in this part of the state. 2.3.2

1107-308 Ingram, Daniel.wpd

Subj: DEIS comments
Date: 11/7/02 8:10:14 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Marc
LastName = Wagner
StreetAddress = 2260 Olde Mill Drive
Address =
City = Bloomington
State = IN
ZipCode = 47401
Email = mwagner@indiana.edu
Comments = I have, at various times, supported the I-70 / US-41 route (I even signed a petition once) but as I have learned more, I have come to the conclusion that the best route for I-69 includes as much of the existing dual highway portion of Indiana-37 as practical ... I've read that Bloomington is the eighth largest city in Indiana but the only city in the top FORTY without an Interstate or passenger rail service. This adversely affects our ability to attract new industry to the area. I have observed much needed growth on the west wide of Bloomington resulting from the upgrade of two major intersections on Indiana-37 to limited access and I think that the I-69 corridor would further advance that growth by replacing dangerous low-visibility crossings with safe easy access ramps and access to local services. While I would not travel to Evansville on a regular basis, the upgrade of the Bloomington-to-Indianapolis corridor of Indiana-37 would shave as much as 25% of the current travel time off the the trip by simply eliminating the start-and-stop traffic through Martinsville and Mooreseville. I recognize the need to consider environmental impact and applaud Indiana for considering alternatives that take those issues into account. However, I think that using the I-70 / US-41 route would provide little benefit to Southern Indiana (once the highway is done) and would be extremely disruptive to the businesses already located along US-41. On the other hand, a well-planned highway, traversing some of the most depressed portions of Southern Indiana and placing exists at key locations could be of great benefit to places like Bedford, Paoli, French Lick / West Baden, and Crane NSWC. Thanks for the opportunity to comment. 2.3.2

1107-245 Wagner, Marc.wpd

October 27, 2002

Lyle Saddler
Project Manager
I-69
INDOT
100 N. Senate Avenue, RoomN855
Indianapolis, IN 46204-2218

This letter is in support of the I-69 direct route segment connecting Evansville and Indianapolis. You and your consultants have done a good and thorough job in this study relying on pertinent issues of access, jobs, economic benefits and safety rather than emotions and NIMBY reaction. Below are some of the reasons I believe you have reached the right conclusions.

Highways are built primarily for three reasons: to provide local access, to stimulate economic development and to create efficiencies for the "through transportation" of goods and people. Which, if any, of these three functions are served by converting and widening US hwy 41 right-of-way to accommodate I-69? Terra Haute already has excellent east/west access to the state capitol and St. Louis via I-70 and good access to Chicago and Evansville via US Hwy 41 while Evansville is the only large Indiana city without direct and convenient access to the state capitol. Routing commercial traffic traveling between Indianapolis and Evansville through Terra Haute is certainly not as efficient as a direct route. The costs of the 41/70 route and the "hypotenuse route" between Evansville and Indy are virtually the same when the cost of upgrading I-70 is included. It may not be necessary to upgrade I-70 if a direct route is built which will reduce traffic on I-70. It is misleading to fail to include I-70 upgrade cost when comparing the cost of the two routes. 3.4.6

Our fine state depends on the manufacturing sector for much of its economic base. Virtually all new major industries are located on sites near interstate or four-lane highways. The 41 corridor is developing well "as is", but the counties without such access lying between Vanderburgh County and Marion County are lagging the state creating economic hardships for those residents. I-69 will help remedy this. Spending a billion dollars on 41/70 will result in replacing a good four lane divided highway with another good four lane divided highway, the primary benefits being the removal of a half dozen stop lights on 41 and bypassing Terra Haute. This would yield a very crooked I-69 route through Indiana that benefits Illinois as much as Indiana. For the same money we can have two good four-lane divided highways with efficient and direct routes through the state improving access and economic benefits for thousands more Hoosiers. 2.3.2 2.3.2

Either route will create many disruptions in and near the highway corridor. Property will be taken or damaged in value. The benefit of a new terrain route is that it can be aligned to miss homes, schools, parks, factories, cemeteries, etc. Existing highways are magnets to these type land uses, so widening 41/70 forces the acquisition of hundreds of such improvements that line this route as well as destroying some of the best cropland in Indiana. The small towns along 41 will be split in two or isolated from the hwy 41 traffic on which they rely. The many roadside produce markets, for example, will be destroyed. The direct route takes more trees and hilly land, but since these are not in short supply in southern Indiana this looks like a good tradeoff.

In the final analysis, just as the professional consultants reported, a direct route disrupts fewer people, prevents major traffic problems during construction, saves more lives, creates more economic benefits and provides a much better highway access between the third largest city in Indiana and the State Capitol.

A final route 5 to 10 miles west of Bloomington would bypass Bloomington but still provide it access. A terminal point in the southwest quadrant of I-465 would be best since it is near the airport and downtown access points.

David Matthews
430 S. Boeke Road
Evansville, IN 47714

1027-015

PUBLIC HEARING COMMENTS

Steve Grantz... Good evening thanks for the opportunity to speak this evening. I'm Steve Grantz, owner and Football Captain Evansville Marine Service. I can't help it, I got to make a comment. O'Bannon's farm is right next to I-64, (inaudible) and that helps us get there. I grew up in Harrison County, that's the only reason I know that. I don't really go to Indianapolis, I don't have a need to, but my customers do. I run 15 tug boats in ten cities in this region that represents 60 transfer terminals moving commodities all over the country. The shortest route from here to Indianapolis will enhance inter modal transportation. And I think it should happen I think it's good for our region, not just Evansville there seems to be a focus on that, it's not just Evansville, it's the whole region. That's the end of my prepared speech. As far as Bloomington and your alls concern about your way of life, I understand that. I also grew up in Harrison County, I-64 is right next to it. We we're out in the boonies raising chickens, pigs, cattle and it didn't ruin our way of life, it helped us to get to the market and I think you all will find it does the same. And as far as the route, we need to make common sense and business decisions, don't just look at the cost of the items. Look at your return on investment, and they have great numbers up here I think they've done a wonderful study. And those numbers show a return on investment is greatest, even though your spending a little more, you spend 60 percent more you get three hundred percent more back, that makes business sense. Farmers make smart business decisions. Look at that, it makes sense guys. That's really all I can think of and my time is up. Thank You. 2.3.2

0821-249 Grantz, Steve.wpd

The I-69 fiasco and reason number 10 why it should not be built:

Since INDOT seems hell-bent on building a new terrain highway no matter what the economic, resource, and human cost might be, I have undertaken a letter writing campaign to inform INDOT of their inherent ignorance of numerous points. I am writing this series of letters as a matter of formal public comment, and I fully expect INDOT to include this in their EIS and actually read and consider the points being made.

A tenth reason why a new terrain I-69 cannot be built is the use of certain indices in the EIS that should have nothing to do with whether or not a new highway is built. Specifically, I am referring to such things as the measure of population growth in Indiana during the last 40 years.

The EIS uses the fact that Indiana has ranked below the national rate of population growth as some sort of reason to justify building a new interstate highway. I have an opinion for you folks – Who cares? I do NOT equate population growth to positive things. High population numbers are found in inner cities with associated high crime rates and low quality of life. High population numbers can be equated with higher unemployment rates, pollution, and congestion. High growth rates can be equated to areas with high illegal immigration rates and uneducated people who don't have a concept of birth control, which leads to higher poverty rates. 2.3.2

Now, how in the world a higher rate of population increase could be looked at as some sort of indicator of goodness, greatness, or positive-ness would be a new one on me. Again I state: High rates of population increase are NOT a good thing. They are a BAD thing. People move out of urban areas to get away from people. They do this when they have enough buying power or enough personal latitude to do so. They do not move into urban areas as they acquire this purchasing power.

Another reason why higher population levels are not good is a reason that the EIS tries to use to justify building a new terrain interstate – unemployment rates. Rather than trying to encourage abnormally high rates of new job creation, governments would be much wiser to encourage stable population levels as a way to ensure low unemployment rates. If a state or region or county could ensure a stable population level, that entity could work to create a certain job base within that region that would not have to be ever increasing, and at the mercy of economic downturns.

The use of rates of population increase in Indiana and the study region as some sort of indicator of how well off the region might be is inappropriate. And it is completely unacceptable to work from the assumption that high rates of population increase are good things. I will say again that they are NOT good things – high population levels and rates of increase are BAD things. INDOT and BLM would do very well to completely excise that whole section from the EIS because it does nothing to do with whether or not a new highway should be built.

I live in southwestern Indiana, and if a new interstate highway will increase the rate of population growth, I DO NOT WANT IT HERE!! Since the decision-makers at INDOT reside in the Indianapolis region, they should not have any kind of say on how to manipulate the population levels of southwestern Indiana. Since I live here, I have a vote and INDOT does not. Do not build a new highway here if it is going to increase the population level or the rate of growth. This would not be a good thing, and will only

serve to exacerbate any future unemployment problems, much like Gary, IN where high population levels dependent on the steel industry eventually led to a place that no one wants to live.

A new terrain highway is UNACCETABLE in southwestern Indiana. The only two acceptable alternatives are to not build it at all (preferable), or to upgrade US 41 / I-70.

Wayne Werne
RR 1 Box 254
Ferdinand, IN 47532

Wayne Werne

Sally P. Getz
7412 Harbour Isle
Indianapolis, IN 46240

October 25, 2002

Michael Grovak
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, IN 47715

RE: Proposed route for I-69

Dear Mr. Grovak,

Please choose improving I-70 and US 41 to Evansville. To build a new terrain interstate would be poor planning and poor resource management. I understand that the I-70/41 route would save state money, but even if it didn't, I think it is preferable to a new terrain route for the following reasons.

- A new terrain interstate would draw activity away from Terre Haute, which is already paved, developed and in need of an economic "shot in the arm". 2.3.2
- A new terrain route would be disruptive to the farming communities in southern Indiana.
- The traffic and growth a new terrain route would bring to Bloomington is unwanted by much of that community.
- New terrain routes are unnecessarily damaging to wetlands, forest and wildlife (something we have very little of in Indiana).
- A new terrain route saves very little drive-time from Indianapolis to Evansville. Even the highest estimates are not worth the expense and environmental damage.

I am told the Governor has a strong bias towards a new terrain route, citing economic development of southern Indiana as an incentive. Please keep in mind that economic activity brought on by interstate development can be short-lived and often produce only low quality service jobs. Indianapolis is having trouble supporting all the shopping malls, strip centers and office developments that have been built in the last couple of decades. Some strip centers as little as 5 to 10 years old are already largely vacant and blighted.

Although agriculture currently does not seem to be a great source of prosperity, I believe the time is approaching where prime farm land will be worth its weight in gold. There is a growing market of consumers who are repulsed by the practices and food products of big agribusinesses and are willing to pay a premium price for quality produce from smaller, local farms. Indiana would be wise to hold on to this resource.

Sincerely,
Sally Getz

cc: Governor O'Bannon

1025-023

Subj: Positive I-69
Date: 9/4/02 1:25:24 PM EST
From: mbarkley@bloombank.com (Mark Barkley)
To: mgrovak@aol.com

To Whom It May Concern:

I am writing to you as a concerned citizen and banker about I-69. Greene County Indiana needs I-69 to pass through its boundaries. Greene County has the dubious honor as being consistently in the top ten percent of unemployed in the state. In the last ten years, there have been seven major employers drastically curtail or close their operations directly effecting over 1000 jobs in a county of only 14,000 employable. The companies include Sunbeam of Linton, GE Linton, Worthington Packing of Worthington, KPT Industries of Bloomfield, GE Bloomington, RCA Bloomington, and Otis of Bloomington. I've included Bloomington because a large portion of the people effected reside in Greene county and must travel to Bloomington for work because our county has little to offer in the way of a good wage paying job. 2.3.2

I stress again, Greene County needs I-69. While the benefits are arguably hard to quantify, our unemployment is not. To prove that a four-lane highway is vital to attracting business, just look at the Woods Wire distribution center in Mooresville. We offered that company free land and a much below market interest rate on a loan for their plant and equipment. Further, we promised ten-year tax abatement even if our bank had to make the tax payments! Their response was that our offer was incredible; however, we weren't on a four-lane. Thus, they built in Mooresville. What a shame, Twenty-five foregone and most needed jobs. 2.3.2

My question to you: How many setbacks are enough until this state understands that southwestern Indiana is in trouble? Please, we beg of you, please don't be swayed by the vocal MINORITY who opposes this vital highway. The economic viability of our county is at stake!

Sincerely,

Mark Barkley
President
Bloomfield State Bank

0904-004 Barkley, Mark.wpd

Subj: DEIS comments
Date: 11/7/02 12:12:59 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Jean
LastName = Evans
StreetAddress = 8461 Central Ave.
Address =
City = Indianapolis
State = IN
ZipCode = 46240
Email = jeanevans@worldnet.att.net
Comments = I strongly support the construction of I69 through Bloomington and to Evansville. Many of the counties south of Bloomington have a high rate of poverty. I feel the interstate would improve the economy of these counties. I would hope the route would go close enough to French Lick that an improved route would increase tourism in this very historic area of the state. I believe the economic benefits of the route would outweigh any negative environmental effects. 2.3.2

1107-383 Evans, Jean.wpd

Subj: DEIS Comments
Date: 8/28/02 11:27:38 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Lynne Chang
Address = 3408 Mulberry Lane
City = Bloomington
State = IN
ZIP = 47401
Email = lchang@tuckerobr.com
Message = My husband and I are residents of Bloomington with 2 children, ages 5 and 3. We are "here for good" -- namely, we have established roots in this community, are active with many different organizations and causes, and plan on living here for a long time. However, we are not "activists" nor do we have any political connections. We feel that it is the opinion of people like ourselves -- solid, long-term, community-oriented, productive citizens -- that are being silenced and ignored.

We are fully in favor of any plan for I69 that comes through/close to Bloomington. We feel that economic growth is critical to the viability and future of Bloomington. We are not affiliated with Indiana University, and although we appreciate everything that IU brings to Bloomington, we feel adamantly that IU CANNOT BE THE ENTIRE ECONOMY OF BLOOMINGTON! Bloomington needs a diverse economic base that includes manufacturing, high technology, services, retail, and agriculture. We need to be friendly to companies (large or small) that could add to the economic diversity of our region. Part of that is providing superior transportation and accesibility for supply and distribution channels. The addition of a good highway network will also help the region to attract talented individuals, thereby reversing the "brain drain" out of South Central Indiana. We have brilliant people graduating from IU every year -- why is it that so few of them stay behind to start new businesses or take high-level jobs? Because there ae no high-level jobs to take! The people that stay are often relegated to serving cappucino at Barnes & Noble. 2.3.2

I apologize for the behavior of my fellow Bloomingtonians at the latest forum at North High School. What happened that night is the exact problem with Bloomington politics and civic life. There is a small but vocal minority that thinks they speak for the entire community. Who are these people? Some of them do not even have jobs or contribute in any way to the local economy except through activism. I thought that activism was to be used as a means to an end, not as an end in itself! These folks seem to do nothing but complain about everything! I do try to understand their concerns. But when I see fellow citizens being laid off by the hundreds, and talented individuals leaving town by the droves for better jobs in Indianapolis and Chicago and Columbus, I ask -- what is more important: jobs for our fellow citizens, or some utopian pastoral vision of Bloomington? Bloomington is NOT "Shangri-La" -- it is a community of people (the majority of whom do NOT work for IU) that needs job growth and economic development. Please bring I69 to Bloomington!

0828-002 Chang, Lynne.wpd

From: Jim Williams [mailto:jaswms@insightbb.com]
Sent: Thursday, October 31, 2002 12:44 PM
To: dlynwagner@aol.com
Cc: carr@carr.69.org; jmoore@elpc.org
Subject: Re: I69

I find your information on I 69 overstated and patently untrue as is typical of the environmental lobby. I have lived in Morgan County all of my 70 years and probably not live to benefit from I69 wherever it is built. However I do have faith that our elected officials will do right by the electorate if they are left alone. You are trying to bring undo influence upon the government, not for the public good, but to promote your own agenda. There is a group of people, particularly around Bloomington, who are ready to protest any action whether they have strongly-and enlightened views on the subject or not. I guess they just want to feel important.

The latest effort on your ill-considered attempt to affect the legitimate course of government lies on my desk at this time. It is about the effect of the highway upon Morgan County. As usual it is lacking in fact:

[1] If the highway follows the route of the present Highway 37 there will be little additional "huge" road cuts needed in the County.

[2] It will not divide Morgan County in two. Between Indianapolis and Martinsville on the east there is little of note between the highway and the river. There is one bridge at Waverly and one at Henderson Ford road with easy access to most property via old 37. To the East there are adequate
roads if there is access at Waverly and Henderson Ford. South of Martinsville if access is provided at old 37 there will be access both to the east and western parts of the County.

[3] The impact on "interstate sprawl" is up to our elected officials and our zoning authority. Not some environmental lobby. I think we can probably take care of our own business.

[4] The use of 37 through the county will not take much additional farm ground. Your thousands of acres is ridiculous however, unfortunately not unusual for your lobby.

[5] Considering where most of your lobby resides your interest in our fresh air is amusing.

[6]As to rural peace and quiet, won't the trucks make the same noise on Highway 41? 5.10

[7]In Morgan County our main stream is White River. It is already polluted by Indianapolis before it gets here. Most of the other streams open into the River at a short distance from 37.

The facts you don't mention:

[1] There is essentially no industry along the proposed corridor. I myself had to spend 40 years driving to Indianapolis to work. You don't mention the parents farther south who lose their children after graduation because of the lack of jobs in the area to be opened up by the road. 2.3.2

[2] A considerable amount of Southern Indiana is already devoted to the Hoosier National Forrest. Look at the map! The environmentalist want an ever growing playground with exclusive rights to themselves no matter the desires of the people already in the areas to be provided access.

[3] I really don't think the people along I70 want double the amount of truck traffic they have at present. Have you tried to go to St.Louis lately? The I70 route would create another problem like the one we have on Indianapolis's Northeast side at present.

[4] For people south of Indianapolis there is no good route to Evansville. Do you think we should all drive to Indianapolis to get on the Interstate?

[5] If the people talking about money are in earnest, I would invite them to take a look at the traffic on I70 through Utah and the cost of construction. Then compare that to the present traffic on 37 and the projected cost of I69.

I grew up hunting and fishing and have always considered myself an environmentalist and you people are giving the concept a bad name. You typically never mention the major strain that population growth is having on our resources and the environment. Is it not "politically correct?"

Jim Williams

1031-012 Williams, Jim.wpd

Subj: New I-69 Study Form Feedback
Date: 8/14/02 4:45:56 PM EST
From: craigm@projectmedia.com (Craig Martindale)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Craig Martindale
1810 West 51st Street
Indianapolis, IN 46228

Message:
Put me on your petition to support I-69 to Evansville.

The lack of this Interstate highway connection costs our state economy about 2 hours of lost productivity per person per trip. Multiply that times the number of people that make trips between Indianapolis and Evansville and that represents a huge amount of squandered capacity.

What may be more important is the lost opportunity. I know of many people in Central Indiana, including myself, who consciously avoid doing business with Southwestern Indiana because of the lack of an Interstate Highway connection. I'll go to Cincinnati on business with little complaint because the drive is easy. But even though Evansville is about as far away, I avoid pursuing business opportunities there because of all of the travel based variables that can erupt: no familiar interface of Interstate exits with logically clustered services, unknown travel delays caused by local issues, few late night or 24 hour services, unknown or irregular availability of gas and food along the way, longer travel time than Interstate highway travel, difficulty in estimating time of travel, annoyance of speed zone changes, concern over local law enforcement issues, and perceived hassle factors ... just to name a few issues that come to mind. 2.3.2

I know that there are some issues (mostly cost and environmental concerns) that have to be handled with intelligence and care, but this highway needs to be put in for inevitable reasons. It needs to be done by caring public servants with attention to detail in order to serve the needs of a huge consituency that just has not been as vocal as it should be. Someday we'll look back at this, and wonder why something so obvious took so long to happen.

This is the first time I've spoken up, but it seemed like a good day for it.

Craig Martindale
Indianapolis, Indiana

0814-010 Martindale, Craig.wpd

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
(B-19J)

John Baxter, Division Administrator
Federal Highway Administration - Indiana Division
575 N. Pennsylvania St., Room 254
Indianapolis, Indiana 46204

RE: EPA Review and Comments on I-69 Evansville to Indianapolis, Indiana
Tier 1 Draft Environmental Impact Statement (DEIS)
CEQ No. 020331

Dear Mr. Baxter:

Thank you for submitting the above-referenced document. We appreciate your early coordination with us and the steps taken to address the concerns raised by the U.S. Environmental Protection Agency Region 5 (EPA) during the scoping period. EPA has been actively participating in the pre-scoping and scoping phases of this project since May 1999. We reviewed the I-69 Evansville to Indianapolis Tier 1 Draft Environmental Impact Statement (Tier 1 DEIS) pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act. Our general issues are highlighted below with detailed comments enclosed for your consideration.

EPA has environmental objections to the 5 "preferred alternatives" identified in the Tier 1 DEIS. Our objections are due to the significant impacts the "preferred alternatives" would have on multiple resources, particularly wetlands and aquatic resources and potential impacts to surface/ground water associated with karst areas. The Tier 1 DEIS indicates that the "preferred alternatives" would directly impact between 90 and 190 acres of wetland, including 70 to 160 acres of direct impact to forested wetlands. Forested wetlands are difficult to replicate. The Tier 1 DEIS indicates that the 5 "preferred alternatives" would impact karst areas, including impacts from induced development associated with an interstate highway. Karst areas experience a very high, rapid interaction between groundwater and surface water, with little buffering or filtration. Current technical capacity for mitigating adverse impacts to ground/surface water and aquatic biota in karst terrain is very limited. Based on information in the Tier 1 DEIS, much of the karst region appears to have limited sanitary sewer service and little regulatory control over on-site wastewater treatment systems and limited local land use planning or controls to protect these resources. 5.19 5.24

In addition, despite the absence of a joint NEPA/404 process, EPA wishes to raise some concerns

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we have regarding future project compliance with Section 404 of the Clean Water Act (CWA). Section 404 requires the selection of the least damaging practicable alternative (LEDPA) under the Section 404(b)(1) Guidelines. We are concerned that the selection of the Preferred Alternative in the Tier 1 FEIS/Record of Decision (ROD) from among the Tier 1 DEIS "preferred alternatives" would not be consistent with the selection of the LEDPA. This is due to the magnitude and severity of the impacts associated with these alternatives as compared to other alternatives analyzed, but not preferred, in the Tier 1 DEIS. EPA believes that the level of detail and analysis in the Tier 1 DEIS should contain alternatives that are likely to be raised for analysis under the Section 404(b)(1) Guidelines. We feel that coordination on this point early in the process will assist future project development by ensuring that all requirements for Section 404 compliance are addressed. Therefore, prior to determining the Preferred Alternative for the Tier 1 FEIS, we strongly recommend that FHWA and INDOT meet jointly with the U.S. Army Corps of Engineers, the U.S. Fish and Wildlife Service, the Indiana Department of Environmental Management, and EPA to discuss compliance with the 404(b)(1) Guidelines and the choice of the LEDPA corridor for this project. We discuss compliance with the Guidelines, in more depth, in our enclosed detailed comments. 5.25

Given the multiplicity and magnitude of environmental impacts, including but not limited to, wetlands, karst, forest and farmland associated with the "preferred alternatives," EPA believes Alternative 1 (i.e., utilize existing U.S. 41/I-70 corridor) is a viable alternative. Alternative 1 has, at least, 2 to 3 times less impact on multiple resources when compared to the "preferred alternatives," with the lowest construction costs and very low operation and maintenance costs. EPA recommends that FHWA and INDOT reevaluate Alternative 1 before choosing a Tier 1 FEIS Preferred Alternative. 6.2

We also encourage FHWA and INDOT to consider developing additional alternatives that combine and/or connect portions of the 12 alternatives analyzed in the Tier 1 DEIS in order to determine if there might be another alternative that has less adverse impact on the environment than the current five "preferred alternatives" identified in the Tier 1 DEIS, while satisfying the project's transportation goals. 3.2.1

Due to the severity of impacts, mitigation measures are a crucial part of this project. We encourage the project sponsors to keep in mind that some impacts may be more adaptable to mitigation than others. This may further influence the selection of the Tier 1 FEIS Preferred Alternative. For NEPA Tier 1, avoidance through selection of alternatives should be the first step, but for those impacts that cannot be avoided, commitments to mitigation, and conceptual mitigation plans, if feasible, should be created for the Tier 1 Preferred Alternative chosen and documented in the Tier 1 FEIS. 7.1

All five "preferred alternatives" (i.e., 2C, 3B, 3C, 4B, and 4C) received an EO-2 rating (environmental objections - additional information needed). This means the EPA review identified significant environmental impacts that must be avoided in order to provide adequate protection of the environment. Additional information is needed, due to the potential severity of

environmental impacts for these corridors. Corrective measures may require substantial changes to those corridors, or consideration of one of the other alternative corridors.
The enclosed table contains NEPA ratings of the individual "preferred alternatives." A summary of the rating definitions is also enclosed.

While EPA's comments indicate areas where additional analysis and information is needed, the Tier 1 DEIS provides a good basis to identify and discuss the many complex issues and environmental impacts associated with a project of this size. We particularly note the high quality Geographic Information System (GIS) data base and resulting Environmental Atlas that was developed for the 26-county study area for this project. The GIS database will be a valuable resource to utilize for future projects in Southwest Indiana. 6.1 4.1

We are available to meet with you to discuss how our issues and concerns can be best addressed. Our staff contact is Virginia Laszewski at (312) 886-7501. We look forward to a continued good working relationship with FHWA and INDOT, and appreciate your continued coordination as this project progresses.

Very truly yours,

Thomas V. Skinner
Regional Administrator

Enclosures (2): Table of NEPA Ratings and Summary of Rating Definitions
EPA Comments on Tier 1 DEIS

cc: J. Bryan Nicol, Commissioner, INDOT
Doug Shelton, Regulatory Branch, U.S. Army Corps of Engineers - Louisville District
Scott Pruitt, Field Supervisor, U.S. Fish and Wildlife Service - Bloomington Field Office
Lori Kaplan, Commissioner, Indiana Department of Environmental Management
John Goss, Director, Indiana Department of Natural Resources

NEPA Ratings for the Corridors Identified in the Tier 1 DEIS as "preferred alternatives" for the I-69 Evansville to Indianapolis Proposal

Tier 1 DEIS Corridor Identified as Preferred Alternative	Description/Basis for Rating	NEPA Rating
2C	From I-64 corridor utilizes existing US 41 to Vincennes then generally follows SR 67 to Martinsville, then utilizes SR 37 to I-465 Travel Time Savings* 19 minutes Karst Sinkhole Areas & Sinking Stream Basins (110 acres) Wetlands (90 - 110 acres), including Forested Wetlands (70 - 80 acres) Streams (120 - 140), including Perennial streams (40 - 45) Floodplains (1,540 - 1,850 acres) Forest (840 - 935 acres), including Core Forest (85 acres) T&E (2 federal), (15 state) Farmland (4,300 - 5,070 acres), including Prime Farmland (3,100 - 4,100 acres) Relocations: Homes (280 - 408), Businesses (56 - 113)	EO-2
3B	From I-64 corridor generally follows SR 57 to Newberry then turns toward Bloomington and connects to SR 37 on the northwest side and continues on SR 37 to I-465 Travel Time Savings* 29 minutes Karst Sinkhole Areas & Sinking Stream Basins (30 acres) Wetlands (100 - 155 acres), including Forested Wetlands (90 - 135 acres) Streams (115 - 135), including Perennial streams (35-45) Floodplains (800 - 1,060 acres) Forest (1,315 - 1,450 acres), including Core Forest (440 acres) T&E (2 federal) (13 state) Farmland (4,290 - 4850), including Prime Farmland (2,300 - 3,750 acres) Relocations: Homes (346 - 484), Businesses (42 - 66)	EO-2

6.2

3C	From I-64 corridor generally follows SR 57 to Newberry then turns toward Bloomington and connect to SR 37 on the southwest side of Bloomington and continues on SR 37 to I-465 Travel Time Savings* 26 minutes Karst Sinkhole Areas & Sinking Stream Basins (50 acres) Wetlands (90 - 130 acres), including Forested Wetlands (80 - 130 acres) Streams (95 - 120), including Perennial streams (30 - 40) Floodplains (820 - 1,080 acres) Forest (1,140 - 1,275 acres), including Core Forest (398 acres) T&E (2 federal) (15 state) Farmland (4,070 - 4,630 acres), including Prime Farmland (2,280 - 3730 acres) Relocations: Homes (370 - 458), Businesses (51 - 75)	EO-2
4B	From I-64 corridor generally follows SR 57 to SR 67, and then generally follows SR 67 to Paragon where it turns north to connect to I-70 Travel Time Savings* 27 minutes Karst Sinkhole Areas & Sinking Stream Basins (140 acres) Wetlands (115 - 165acres), including Forested Wetlands (105 - 145 acres) Streams (105 - 120), including Perennial streams (35 - 40) Floodplains (1,080 - 1,120 acres) Forest (935 - 1,005 acres), including Core Forest (142 acres) T&E (2 federal) (9 state) Farmland (4,970 - 5,020 acres), including Prime Farmland (3,290 - 4,130 acres) Relocations: Homes (158 - 179), Businesses (11 - 12)	EO-2
4C	From I-64 corridor generally follows SR 57 to SR 67, then generally follows SR 67 to Martinsville, then utilizes SR 37 Travel Time Savings* 26 minutes Karst Sinkhole Areas & Sinking Stream Basins (110 acres) Wetlands (140 - 190 acres), including Forested Wetlands (115 - 160 acres) Streams (130 - 145), including Perennial Streams (45 - 50) Floodplains (1,550 - 1,810 acres) Forest (805 - 935 acres), including Core Forest (97 acres) T&E (2 federal) (15 state) Farmland (5,170 - 5,730 acres), including Prime Farmland (3,480 - 4,880 acres) Relocations: Homes (247 - 336), Businesses (35 - 59)	EO-2
[redacted]		[redacted]

6.2

* Evansville to Indianapolis "Typical Travel Time" saved compared to the 2025 No-Build Alternative.

SUMMARY OF RATING DEFINITIONS AND FOLLOWUP ACTIONS*

ENVIRONMENTAL IMPACT OF THE ACTION

LO——Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO——Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU——Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1——Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

**From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment.*

EPA Region 5 Review and Comments on
I-69 Evansville to Indianapolis, Indiana Project
Tier 1 Draft Environmental Impact Statement (Tier 1 DEIS)
CEQ No. 020331

GENERAL COMMENTS

The overall purpose of the project is to build the National I-69 Segment of Independent Utility (SIU) between Evansville and Indianapolis. One location may be preferred to another. However, each corridor alternative has impacts to the environment and the communities associated with the various corridor locations.

EPA recognizes that FHWA and INDOT are utilizing a Tiered approach for the proposed project to comply with NEPA. The Tier 1 DEIS, with a few exceptions, generally provides a sufficient level of detail and analysis needed to identify likely environmental impacts for any of the 12 build corridor alternatives. The Tier 1 information and analysis should allow FHWA and INDOT to identify the corridor that is the Least Environmentally Damaging Practicable Alternative (LEDPA) for compliance with the Clean Water Act (CWA) Section 404(b)(1) Guidelines. We strongly encourage FHWA and INDOT to include sufficient documentation in the Tier 1 FEIS to allow for the identification of the LEDPA corridor. 5.25

We recognize that more detailed site-specific information and analysis will be provided in the Tier 2 NEPA documentation. Consequently, our comments on the Tier 1 DEIS focus on the adequacy of information and analysis for the identification of a Preferred Alternative corridor in the Tier 1 FEIS.

"PREFERRED ALTERNATIVES", "NON-PREFERRED" ALTERNATIVES AND ALTERNATIVE 1

The Tier 1 DEIS (p. 3-15) states: "In general, alternatives were carried forward for detailed study in an EIS only if they clearly satisfy the projects's goals, as defined in the Purpose and Need Statement. In this case, the decision to carry forward a geographically diverse range means that the performance of certain alternatives is marginal on certain performance measures - including measures related to core goals." All 12 corridor alternatives identified and analyzed in the Tier DEIS appear to satisfy the Purpose and Need (P&N) for the proposal. 3.3.3

EPA recognizes that some alternatives satisfy the P&N better than others on the transportation performance measures identified for the Level 3 analysis. For many of the core goals performance measures, the difference between best and worst performers does not appear to be substantial. For example, the Tier 1 DEIS documents incremental travel time improvements for each alternative compared with the 2025 no-build baseline. The difference between the slowest performing Alternative (Alternative 1) and the fastest performing Alternative (Alternative 3B) for the measurable objectives of Travel Time Savings between Evansville and Indianapolis, is 13 minutes 6.1

for Freeflow Travel Time Savings and 17 minutes for Typical Travel Time Savings. The percent difference in typical travel time saved is 10% between Alternative 1 and Alternative 3B. The percent difference between Alternative 1 and the remaining "preferred alternatives" is less than 10%. We do not consider this difference to be compelling. 6.1

According to the Tier 1 DEIS, the Alternative 1 corridor would have substantially fewer impacts than any of the "preferred alternatives" and the remaining "non-preferred" alternatives. Alternative 1 meets the stated needs identified under the three core goals for the project: (1) Improve the transportation linkage between Evansville and Indianapolis, (2) Improve personal accessibility for Southwest Indiana residents, and (3) Facilitate interstate and international movements of freight through the I-69 corridor, in a manner consistent with the National I-69 policies. 6.2

Given the substantial difference between the estimated environmental impacts for Alternative 1 and the remaining 11 build Alternatives, including the 5 "preferred alternatives," we highly recommend that Alternative 1 be re-evaluated prior to making a "Preferred Alternative" decision for the Tier 1 FEIS.

We agree that Alternatives 5A and 5B are "non-preferred" alternatives, due to their severe environmental impacts on sensitive resource areas. 6.2

WATERS OF THE UNITED STATES AND AQUATIC RESOURCES

EPA, together with our State Agency and Federal partners, has responsibility for the regulation of water resources under the Clean Water Act and the Safe Drinking Water Act. A variety of aquatic impacts are considered in the Tier 1 DEIS. The information provided in the Tier 1 DEIS is generally adequate for this level of assessment – a comparison of the study bands with best estimates for their environmental impacts to water resources. We will indicate items to be clarified and developed further in the Tier 1 FEIS. 5.24

CWA Section 404(b)(1) Guidelines Compliance

EPA and the U.S. Army Corps of Engineers (COE) have joint responsibility in administering Section 404 of the Clean Water Act (CWA). This responsibility includes the review of permit applications to place fill material in or dredge waters of the United States, including most wetlands. A 404 permit would have to be issued (and receive Section 401 water quality certification from the State of Indiana) for this large, linear project before construction may begin. A joint NEPA/404 process has not been used for this project. We wish to be as clear as possible on the issues we see with this project before detailed alignment work is done and prior to any formal application for a 404 permit.

EPA has issued detailed environmental guidelines for issuing a 404 permit. These stress the principle of "sequencing"–first avoiding the resource, then minimizing both the extent of the resource affected and the way the resource is affected and finally providing compensatory

mitigation to offset any unavoidable loss. In the Tier 1 EIS, we are interested in finding the corridor alternative with the greatest potential for first avoiding and then minimizing locational impacts to water resources. At this information level, consideration of mitigation through specific construction techniques and wetland replacement is largely conceptual, as has been addressed in the Tier 1 DEIS document. Our Tier 1 FEIS comments employ the environmental guidelines used to review prospective Section 404 permits, the Section 404 (b)(1) Guidelines, found in 40 CFR Part 30. 5.24 7.1

Wetlands and Aquatic Resources Impacts

A number of water feature primary impacts were considered in the Tier 1 DEIS:

- Wetlands
- High quality natural areas/refuges with wetlands and/or other aquatic features
- Lakes/ "open waters"
- Streams
- Floodplains
- Designated impaired waters [CWA Section 303(d) List]
- Groundwater
- Sole source aquifers (none in the study area)
- Karst areas-caves, sinking basins, sink holes, subsurface drainage ways
- Wells and public water supplies.

WETLANDS

Wetlands were identified from the National Wetlands Inventory maps for each study band. This is an appropriate approach for the Tier 1 study. Steps have been taken with several alternatives to shift the study bands away from notable wetland areas. Ranges of direct wetland impact have been identified for each of the project alternatives. Most of these losses would be to forested wetland systems, with a few additional acres of scrub-shrub wetlands and emergent wetlands. Bottomland hardwood/palustrine forested wetlands are an Indiana Department of Natural Resources priority forest type. Many threatened and endangered species in Indiana are wetland dependent. Alternative 1 has an estimated impact of filling 25-40 acres of wetland, 2C an impact of 90-110 acres, 3B an impact of 100-155 acres, 3C an impact of 90-150 acres, 4B 115-165 acres and 4C an impact of 140-190 acres. None of the build alternatives avoid wetland impacts completely, and this would be unlikely in a large, linear project such as this. What is noteworthy is that Alternative 1 is likely to have three to five times less wetland impact than the other build alternatives. This difference would not likely be overcome by careful routing of the highway alignment in Tier 2. 5.19 5.19

The potential adverse impacts to water resources from this project must be considered in context of massive historic loss or degradation of water resources in Indiana, including a loss of about 87 percent of its historic wetlands coverage and the loss of their functions and values. In addition, the historic channelization of substantial proportions of streams in Southwest Indiana has resulted in loss of natural stream channel geomorphology and riffle-pool systems, with a loss of functions and values. 5.19 5.22

Please identify and avoid any existing 404 Permit compensatory mitigation sites lying within the study bands for the Tier 1 FEIS. We understand that the COE - Louisville District Office is currently developing this information. 5.19

Secondary impacts are estimated to add a few more acres of wetland loss to each alternative. This will need to be a topic for greater examination in the Tier 2 NEPA analysis and documentation. An inventory and impact analysis to farmed wetlands should be included in the Tier 2 NEPA analysis and documentation. 5.19

The Tier 1 DEIS correctly acknowledges the potential and responsibility for reducing wetlands impacts during the selection of a specific construction corridor to avoid wetland areas and if necessary, to select less damaging portions of them to fill. It also recognizes the opportunity in design and construction techniques to lessen these impacts. Finally, compensatory mitigation would be provided to offset any permitted wetlands loss, preferably by wetland restoration at ratios at several times the acres lost to the acres restored. This attempts to address the serious problem of the time and uncertainty it takes to restore a wooded wetland. The difficulty of restoring wooded wetlands is acknowledged in the 2002 Compensating for Wetlands Losses Under the Clean Water Act report of the National Research Council, National Academy of Sciences. The specifics of mitigation will need to be added in the Tier 2 documents and would be finalized as part of any 404 permit. Wetlands are considered to be special aquatic sites for Section 404 permitting, see below. 5.19 7.1 5.25

HIGH QUALITY NATURAL AREAS WITH WETLANDS AND/OR OTHER AQUATIC FEATURES

The Tier 1 DEIS inventoried a number of sites that the alternative study bands were able to avoid, such as Bean Blossom Bottoms, portions of which are State and Federal preserves and refuges. There are no National Wild and Scenic Rivers in the study area. Still, several of the "preferred alternatives" may affect high quality natural areas: 5.23 5.11

- The Patoka Wildlife Refuge/Patoka River Bottoms area–7-8 acres of wetland, for alternatives 3, 4 and 5. The routing lies within the prospective acquisition boundary of the refuge.
- Flat Creek wetland complex–potential impacts from alternatives 3, 4, and 5.
- Prides Creek wetland complex–crossed by alternatives 3, 4 and 5. 5.23
- West Fork White River wetland complex–crossed by alternative 4. This is potentially eligible for inclusion in the National Wild and Scenic Rivers system.

The Tier 1 FEIS needs full identification on the designation of these and any other natural sites in primary impact zones that are sanctuaries and refuges, consisting of areas designated under State and Federal laws or local ordinances to be managed principally for the preservation and use of fish and wildlife resources. Please also indicate all natural areas that are not designated as a federal,

state or local sanctuaries or refuges. Sanctuaries and refuges, such as the Patoka Wildlife Refuge, must generally be avoided to receive a Section 404 permit, see below. Alternatives 1 and 2C avoid this area while the other "preferred alternatives" do not. 5.23

STREAM AND OPEN WATER IMPACTS

All project alternatives are likely to involve crossing open water and perennial and intermittent streams. "Open water" is not well explained in the Tier 1 DEIS, but appears to mean small oxbows and other lakes. Impacts would be of similar magnitude for alternatives 1, 3B and 3C, in the range of 5-10 water bodies. Alternatives 2C, 4-B and 4C have a range about twice to five times that size, at 20-25 water bodies. We note that the numbers for open water do not match between Tables 5.22-1 and 5.24-1. 5.22 5.22

Alternative 1 has the fewest crossings of perennial streams, at 15-20, in contrast to 35-45 for the various "preferred alternatives," or half or less of the impact. The impact ranges are closer for estimated intermittent stream crossings, with Alternative 1 being the least at 50-55. Each of the five "preferred alternatives" would cross 65 to 95 intermittent streams.

Much of the future Tier 2 detailed analysis of stream and open water impacts occurs in the placement of the highway corridor and the details of crossing points and highway design. Such an analysis must also consider impacts to stream riffle-pool complexes, which are considered special aquatic sites for Section 404 purposes. Natural stream segments with good riffle-pool structure are especially significant in Indiana, due to the historic channelization of a substantial proportion of streams. Alternative 1 presents a much greater opportunity for reducing environmental impacts to lake and stream aquatic resources. 5.22

FLOODPLAIN IMPACTS

The "preferred alternatives" have two to three times the potential impacts to acres of floodplains (800 to 1,850 acres), compared to Alternative 1 (370 to 470 acres). The remaining "non-preferred" alternatives would impact between 860 to 1,200 acres. Flooding is a natural process and it is highly desirable to have room for floodwater movement and storage, through the retention of floodplains and of wetlands in the watershed. Alternative 1 presents a substantial environmental savings over the five "preferred alternatives." 5.18

DESIGNATED IMPAIRED WATERS

Under Section 303(d) of the Clean Water Act, the State of Indiana has developed a list of impaired water bodies and a categorization of the reasons for their impairment. When EPA considers environmental assessment of a project, we want to be sure that high quality waters are not degraded and that impaired waters are not hindered from recovering. Pollutants are introduced into impaired waters through many sources. Some of these are related to industrial or municipal wastewater discharges, such as polychlorinated biphenyls (PCBs). Others come from watershed practices as polluted runoff containing pesticides, nutrients, or sediment. Often the impaired water body has a complicated mix of stressors and sources.

The Tier 1 DEIS identifies six streams having a high or medium degree of impairment, for various 5.24

reasons, crossed by the five "preferred alternatives" and Alternative 1. The impacts assessment focuses on the presence of PCB's in each of these water bodies, but does not describe the mechanisms of environmental impact. The Tier 1 FEIS should identify these mechanisms, such as resuspension of PCBs, mercury and lead in sediments during construction. Some water bodies are listed for impairments of low dissolved oxygen, high *E. coli* (bacterial) levels or impaired biota. Please explain whether the filling of these waters, and their associated wetlands, or the projects's "temporary" construction impacts will aggravate impairments to these water bodies. Additional secondary impacts may be incurred from changes in watershed use due to highway access/interchange locations, a Tier 2 subject. Depending on the nature of the impacts, appropriate mitigation must be planned. 5.24

GROUNDWATER AND KARST AREAS

The study area has varied geological regions, ranging from areas of glacial till deposits, to the interactive surface-groundwater karst region of dissolved limestone. Groundwater in glacial till areas is much more protected from surface pollution than is groundwater in karst areas. 5.24

For groundwater protection purposes, it is advantageous to locate major highways and their induced development in till regions. Alternative 1 is virtually all in the till region, away from caves. Alternatives 2 and 4 are largely in till, away from caves. Alternatives 3 and 5 traverse intense concentrations of cave and karst topography.

Karst features include caves, sinking basins, sink holes and subsurface drainage ways. Karst regions experience a very high, rapid degree of interaction between groundwater and surface water, with little buffering or filtration capacity. Alternative 1 avoids karst features, which is extremely desirable for water quality. The "preferred alternatives" have between 15-20 acres of sinking basin crossing impact and 30-90 acres of sinkholes. This is a substantial amount of impact.

The caves and underground drainage ways of karst areas are the unique habitat of a number of rare or endangered species, as indicated in the Tier 1 DEIS. Biological and hydrological surveys are incomplete in portions of the study area. 5.17

Much of the karst region has limited sanitary sewer service and little regulatory control over on-site wastewater treatment systems. It also has limited local land use planning or controls. Portions of it are served by public rural water supplies, permitting additional growth and development, potentially spurred at interchanges or by easier commuting accessibility. Poorly designed or operated on-site wastewater treatment systems (e.g., septic systems) have a high potential for ground/surface water contamination, since it can be easy to discharge wastewater into the ground and hard to achieve good soil filtration from a drain field. 5.24

Current technical capacity for mitigating adverse impacts to the ground/surface water resources and aquatic biota in karst terrain is very limited. Good planning and management principles and practices for the primary impacts due to highway construction and operation in karst country were developed in the 1993 Memorandum of Understanding (MOU) between INDOT, IDEM and 5.24

USFWS. We are pleased that INDOT and FHWA are committed to following the MOU on this project. However, those principles and practices do not substitute for avoiding karst resource areas, if possible. Alternative 1 avoids the karst and cave region of southwest Indiana, to considerable environmental advantage for avoiding primary and secondary impacts to ground/surface water. 5.24

Alternatives 5A and 5B have severe environmental impacts on sensitive karst areas, including the Tincher Special Management Area of the Hoosier National Forest. 6.1

The Tier 1 DEIS (p. 5-229) correctly identifies karst and cave regions as an irretrievable resource. EPA requests FHWA and INDOT conduct an assessment of the adequacy of any State, regional and/or local regulations (e.g., zoning, land use plans, on-site septic system regulations, etc.) that would protect sensitive karst features for those karst areas that the Tier 1 alternatives are located in. This assessment should also evaluate and discuss whether adequate implementation and/or enforcement of any control measures identified are taking place. In addition, if areas are found that have inadequate controls and/or enforcement for protecting sensitive karst features, an assessment should be made of the likelihood that proper control mechanisms will be put in place if an alternative is implemented through karst areas. This information should be taken into consideration prior to choosing a Tier 1 FEIS Preferred Alternative. The assessment and its results should be included in the Tier 1 FEIS. 5.24

It is not clear what spill and hazardous response capacity exists along the study bands in the karst/cave region. This should be explained in the Tier 1 FEIS.

WELLS AND PUBLIC WATER SUPPLIES

Alternatives 1 and 2C have between 1 to 4 public wells and 4 well heads in their study bands. The other "preferred alternatives" have none. Some of these sites are near existing highways. It is not clear what existing measures are in place for spill response to protect them. This should be addressed in the Tier 1 FEIS. 5.24

EPA encourages the sponsors of the project to contact representatives of the Groundwater Section of the Indiana Department of Environmental Management, include them in the planning process, and keep them informed of the project's progress.

DISCUSSION AND CONCLUSIONS

The Section 404(b)(1) Guidelines at 40 CFR Part 230.10(a) state that ". . .no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences." A practicable alternative is one "available and capable of being done after taking into consideration cost, existing technology and logistics in light of overall project purposes." All 5 "preferred alternatives" and Alternative 1 have been seriously proposed as Tier 1 DEIS alternatives and meet the overall project purpose of providing an interstate highway route between Evansville and Indianapolis. Furthermore, there is a substantial and striking difference in the amount of environmental impacts to aquatic resources 5.25

between Alternative 1 and the 5 "preferred alternatives." Alternatives from the NEPA documents (including this Tier 1 DEIS) are considered to be the basis for alternatives for the 404 analysis [40 CFR 230.10(a), not just the alternative selected in the Tier 1 FEIS/ROD. 5.25

The Guidelines protect wetlands and other special aquatic sites from unnecessary destruction or degradation. As the preamble to the Guidelines states, if destruction may be reasonably avoided it should be avoided. Special aquatic sites, at Subpart E, include wetlands, sanctuaries and refuges designated under State and Federal Laws or local ordinances and riffle and pool complexes in streams. For non-water dependent activities, such as highways, the Guidelines presume that practicable alternatives that do not involve special aquatic sites are available, unless clearly demonstrated otherwise by the applicant.

Four of the "preferred alternatives" (3B, 3C, 4B, 4C) would involve filling wetlands within the designated acquisition boundary of the Patoka River National Wildlife Refuge. This would effectively segment the refuge and preclude the potential for acquiring a contiguous minimally disturbed river refuge system. While Alternative 2C also avoids the Patoka River National Wildlife Refuge area, it has an estimated wetlands impact of about three times that of Alternative 1. Alternative 1 avoids this refuge area entirely, and would fulfill the requirements of the 404(b)(1) Guidelines, with significantly less wetland impact. 5.25

Clarification on the full inventory of designated sanctuaries and refuges, including ones recognized by local ordinance, needs to be provided in the Tier 1 FEIS. Please also indicate all natural areas that are not designated as a federal, state or local sanctuaries or refuges. Impacts to wetlands and to riffle-pool complexes would have to be evaluated thoroughly, in light of being special aquatic sites in the Guidelines, in Tier 2. 5.23

Portions of the floodplain may also be a wetland. For environmental, maintenance and public safety reasons, it is desirable to avoid locating a road in a floodplain, or constricting the water storage capacity of the floodplain. Alternative 1 presents substantial floodplain avoidance over the 5 "preferred alternatives." Floodplain alteration is regulated directly by the Indiana Department of Natural Resources. We encourage, where practical, bridging of unavoidable wetland and floodplain areas to minimize fill and allow for movement of flood waters and wildlife. 5.18

There are intrinsic water quality difficulties with working in karst areas. Ground/surface water is unusually vulnerable to surface contamination, and current technology to mitigate for these impacts is limited. Avoidance is the best way to avoid adverse primary and secondary impacts. Alternative 1 completely avoids the karst and cave region. Alternative 5 presents unacceptable adverse environmental impact potential.

Alternative 1 presents the strongest groundwater protection capacity, due to its location almost entirely on glacial till geology. Although it contains several public wells and well heads in its study band, many of these are located near existing Highway 41. With or without a new highway, there needs to be a good emergency response capacity for spills. This was not addressed 5.24

in the Tier 1 DEIS and should be included in the Tier 1 FEIS, if possible. If either Alternative 1 or 2C are developed in the Tier 2 EIS, studies should be conducted to understand the nature of the groundwater flow geometry to the wells, to aid in spill response. The Tier 1 FEIS should also evaluate and document whether the existing public water supply systems have adequate capacity to serve new customers anticipated from secondary growth induced by the new highway. 5.24

Alternative 1 has, by far, the least amount of impact to wetlands and other aquatic resources. It avoids the Patoka National Wildlife Refuge area. Its potential impacts to public water supplies are similar to the existing situation with the location of Highway 41 and can be dealt with through a thorough study of the wellhead protection areas and suitable hazardous response capacity in the event of any spills. Alternative 1 has substantially less environmental impact to farm land, prime agricultural land, and forest. Its transportation performance relative to the "preferred alternatives" is not substantially worse for most of the core performance measures.

Based on information presented in the Tier 1 DEIS, Alternative 1 appears to be the alternative that most fully complies with the Section 404(b)(1) Guidelines. Full determination of compliance would need to be based on a more detailed level of information than is appropriate for this Tier 1 EIS. 5.25

ADDITIONAL CLARIFICATION NECESSARY FOR WATER TOPICS IN THE TIER 1 FINAL EIS:

- Select the practicable alternative with the least adverse impact on aquatic ecosystems. It must not contribute to the degradation of special aquatic sites, including wetlands, refuges, or riffle-pool stream segments; 5.25
- Include the detailed identification, evaluation and assessment of State, regional and local regulations for protecting sensitive karst features for each of the 12 alternatives as discussed above; 5.24
- Identify designated refuges and preserves within the study bands–State, Federal, local; and, also note where an area is not designated; 5.23
- Expand discussion on why crossing impaired waters is problematic; address increasing designated impairments from indirect watershed impacts; 5.24
- Identify existing spill and hazardous response capacity in place or needed for public wells/water supply areas in the highway study bands and for study bands in the karst/cave region; 5.24
- Map and avoid existing compensatory mitigation sites established for 404 permits; 5.19
- Identify capacity of existing public water supply systems to handle additional customers from growth induced by the new highway; and, 5.24

- Please fix the open water table entries for consistency. 5.22

ADDITIONAL RESOURCE CONCERNS AND COMMENTS

Forest and Habitat Fragmentation Impacts
We are concerned about the loss of forest land and fragmentation of forest habitat. Forests serve as important cover, food sources and travel corridors for animals. Core forests support interior forest dwelling birds and neo-tropical migrant populations. Forests also help to protect the water quality of lakes and streams by acting as a vegetative buffer in the watershed.

The Tier 1 DEIS estimates that the "preferred alternatives" would directly impact between 805 to1,450 acres of forest. Of these, 85 to 440 acres would be core forest land. Alternative 1 would directly impact 110 to 170 acres of forest, with no impact to core forest land. The remaining "non-preferred" alternatives would have a direct impact of 850 to 1,580 forest acres, with 117 to 682 acres of core forest. These are significant impacts. EPA believes Alternative 1 is far superior to any of the other Tier 1 DEIS alternatives for avoiding impacts to forest land and forest habitat. Alternatives 5A, 5B and 3A are particularly severe on core forest land, with direct impacts between 502 and 682 acres.

With the substantial projected loss of forest land and forest fragmentation associated with any of the "preferred alternatives" implementation of the project will contribute to significant loss of forest wildlife habitat in the project area and will contribute to the loss of surface water quality. The Tier 1 DEIS does not identify whether local communities in the study area have ordinances, zoning regulations or some other means to protect forest habitat. This information should be considered prior to choosing a Tier 1 Preferred Alternative and included in the Tier 1 FEIS. 5.21

Mitigation: We recommend that tree mitigation for any unavoidable tree loss be undertaken. This might occur by planting replacement trees in areas that are associated with upland buffers for wetland mitigation. Mitigation might also include assisting, county, state, or federal agencies with any on-going or planned forest reclamation projects in the watersheds affected. We recommend that the proponents commit to voluntary forest mitigation in the Tier 1 FEIS and provide, as detailed as possible, a conceptual forest mitigation plan that compensates for the loss and fragmentation of forest habitat due to the alignment or alignments chosen for the Preferred Alternative. 7.1

Farmland Impacts
The Tier 1 DEIS identifies that the land use category in the Study Area that will have the largest acreage loss due to project implementation is farmland. The Tier 1 DEIS (p.5-229) correctly identifies farmland as an irretrievable resource. For the "preferred alternatives," direct farmland loss ranges between 4,070 and 5,730 acres, with prime farmland loss between 2,300 and 4,880 acres. For Alternative 1, estimated direct farmland loss is between 1,270 to 1,780 acres, including

810 to 1,330 acres of prime farmland. The remaining "non-preferred" alternatives are estimated to directly impact 3,630 to 4,560 acres of farmland, including 2,330 to 3,690 acres of prime farmland.

Alternative 1 would have a significantly lower impact on farmland in Southwest Indiana than any of the Tier 1 DEIS alternatives, including the "preferred alternatives." Alternative 1 also has an advantage in that it follows existing rights-of-way (ROW) through most of its length. This would minimize new segmentation of working farms. 5.20

Mitigation: Appropriate mitigation measures should be developed by coordinating with the appropriate state and federal agencies, and landowners. Mitigation measures, if feasible, should be identified, and committed to, in the Tier 1 FEIS, and in the Tier 2 NEPA documentation. 7.1

Endangered Species
We note that federally-protected species are listed for the area by the U.S. Fish and Wildlife Service (USFWS). Similarly, state-protected species are listed by the Indiana Department of Natural Resources (IDNR). EPA principally defers to the USFWS and IDNR regarding endangered species assessments, and encourages FHWA and INDOT to continue coordination with the USFWS and IDNR as appropriate. This coordination should be documented in the Tier 1 FEIS. 5.17

Hazardous Waste Sites
The Tier 1 DEIS indicates that no Superfund [Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)] sites or landfills would be directly impacted by any of the alternatives, except Alternative 5 and Alternative 3A. These alternatives pass near the Dillman Road Wastewater Treatment Plant Landfill on SR 37. It is unclear from the Tier 1 DEIS information, exactly how Alternatives 5 and 3A would impact the Landfill and what the consequences might be. If one of these alternatives are identified in the Tier 1 FEIS as the Preferred Alternative, additional information and discussion of any adverse impacts associated with these alternatives should be included in the Tier 1 FEIS. 5.16

The Tier 1 DEIS identifies 7 CERCLA sites located within 1 mile of some of the alternatives. The Tier 1 DEIS identifies that the Lemon Lane Landfill, the Bennett Stone Quarry, and the Neal's Landfill have impacted the water quality of Clear Creek, Stout Creek, and springs that flow into Conrad's Branch which flows into Richland Creek. These streams have elevated levels of PCBs and Stout Creek also has elevated levels of mercury (Hg). These streams would be crossed by Alternatives 3 and 5. If applicable, the Tier 2 NEPA documentation should provide detailed construction mitigation measures for any culvert or bridging activity proposed for these streams to insure as much as possible that sediments containing PCB and Hg are not re-suspended into the water column during construction and that proper characterization and disposal of any removed sediments occurs. 5.24

Resource Conservation and Recovery Act (RCRA), brownfield, Underground Storage Tank (UST) and Leaky Underground Storage Tank (LUST) sites are also found throughout the various 5.16

alternative corridor locations. The Tier 1 DEIS states that the results of their analysis show that Alternative 1 may have the fewest number of hazardous waste sites and Alternative 5 may have the greatest number. If hazardous waste site remediation is likely to be needed for the Preferred Alternative identified in the Tier 1 FEIS, then the Tier 1 FEIS should discuss how FHWA and INDOT plan to coordinate these activities with EPA and the appropriate State agencies. 5.16

Social Impacts and Environmental Justice

The Tier 1 DEIS acknowledges (p. 5-14) that the relocation impacts resulting from any of the alternatives are expected to be large and complex. The new interstate would cause some splitting of neighborhoods and communities, and cause local access problems. 5.3

Relocation of Residences - The Tier 1 DEIS estimates residential relocations are between 158 to 468 for the "preferred alternatives," and between 143 and 503 for all 12 alternatives evaluated. Alternative 1 would impact between 264 to 335 residences. Of the "preferred alternatives," Alternative 3B has the greatest residential relocations between 346 - 484, and Alternative 2C the least, 158 - 179 residential relocations.

Relocation of Businesses - Business relocations of the 12 alternatives range between 8 - 131. Alternative 1 could potentially have the highest business relocation impacts, between 70 - 131. The "preferred alternatives" could potentially impact between 11 to 113 businesses. Of the "preferred alternatives," 4B would have the least amount of business relocations, 11 - 12, and Alternative 2C the greatest, 56 - 113.

Environmental Justice (EJ) - For the Tier 1 level of analysis, EPA concurs that the initial environmental justice review shows that none of the alternatives would have a disproportionately high and adverse effect on minority and low-income populations in the Study Area. The Tier 1 DEIS proposes (p. 5-28) that a more detailed analysis of minority and low-income populations will be included to determine specific effects to these populations in Tier 2. The Tier 1 FEIS should provide the specific methodology that will be used for this detailed analysis. 5.4

If percentages of low-income or minority populations are elevated within the Tier 2 project segments, Tier 2 alignment alternatives within the segments should be considered that avoid and minimize impacts to potential EJ areas. The issue of disproportionately high and adverse impacts should also be evaluated in the Tier 2 documents by comparing environmental impact data to EJ information for highway segments. Adverse effects are defined as "disproportionate" if the risk of adverse environmental impacts are predominately borne in areas with minority or low-income populations or if the impacts are greater in magnitude in areas with minority or low-income populations than in other areas. When analyzing these impacts, it is important to assess both the negative and positive impacts, consider both the short and long-term effects as well as the secondary and cumulative impacts. 5.4

One of the most detrimental aspects of controlled access highways can be to divide defined communities, regardless of whether they are EJ communities. If impacts are unavoidable, EPA recommends that coordination with these affected populations be conducted to determine and take 5.3

into consideration the affected population's concerns and comments regarding the proposed project. 5.3

Cultural Resources/Historic Preservation

EPA recognizes that there may be potential adverse effects to cultural resources from any of the build Alternatives. We are aware of the ongoing National Historic Preservation Act Section 106 consultation with the State Historic Preservation Officer (SHPO). Therefore, EPA defers to the parties involved in the Section 106 consultation to consider and to address those potential adverse effects associated with the proposed project.

We recommend that FHWA include, if applicable, concurrence from the SHPO regarding the results of the Section 106 consultation process for the Tier 1 NEPA process in the Tier 1 FEIS. This will insure that any adverse effects to cultural/historic resources, and possible mitigation measures for adverse effects, are identified, and taken into consideration when selecting the Preferred Alternative that will be identified in the Tier 1 FEIS. 5.13

Air Quality

Carbon Monoxide modeling should be conducted for the final Preferred Alternative at suspected hot spot locations to assure that no concentrations over the National Ambient Air Quality Standards (NAAQS) are expected. This information should be included in the Tier 2 NEPA documentation. 5.9

The 8 hour ozone standard and the PM 2.5 standard have been upheld by the courts. Although EPA has not designated areas under the new standards, some air monitoring data is available to determine if counties are showing attainment or non-attainment. The Tier 2 documentation should list and evaluate the available air monitoring data for the affected counties. Additional reductions in precursor emissions will be required if and when these counties are designated under the new standards. 5.9

The methodology used for the evaluation of alternatives with respect to the mobile source budgets for Indianapolis and Evansville is acceptable. It should be noted however, that the impacts of the final selected alternative segments must be included in the long range plans for these areas and must be modeled to demonstrate conformity before the final Tier 2 decisions are issued. 5.9

MONROE COUNTY
BOARD OF COMMISSIONERS

BRIAN O'NEILL, PRESIDENT
825-5205
IRIS F. KIESLING, VICE-PRESIDENT
332-5224
JOYCE POLING, COMMISSIONER
339-6160

THE COURTHOUSE, ROOM 322
BLOOMINGTON, INDIANA 47404
TELEPHONE: (812)349-2550
FACSIMILE: (812)349-2959

October 25, 2002

Mike Grovak
Project Manager
Bernardin Lochmueller and Assoc. Inc.
6200 Vogel Rd.
Evansville, IN 47715

Dear Mr. Grovak:

In my opinion, as a County Commissioner and member of the Plan Commission, the new terrain alternatives through Monroe County are unacceptable.

First, the Federal Government should be investing in high speed rail and maintaining existing roads. It is neither environmentally nor geopolitically in our interests to continue funding roads at the expense of alternative transportation systems. The environmental price tag is too high, and it increases our vulnerability to the foreign oil cartels. 3.2.1

Second, I understand the environmental vulnerabilities and natural assets of my county. I can say unconditionally that the new terrain alternative through Monroe County is environmentally unsound, would dislocate many families, and would destroy farms, archeological / historical sites, and some of our most beautiful natural areas.

Third, although I am not as familiar with the constraints and natural assets in other counties, I would urge you to refrain from any routes involving new terrain.

Fourth, if in addition to improving the connection between Evansville and Indianapolis, the goal is to include Bloomington and Crane within the corridor, then the route following SR67 and SR 57 would be acceptable if it were reconfigured to eliminate the new terrain portions.

Sincerely,

Brian O'Neill

1025-039

cc: Brian Nicol, Highway Commissioner
cc: Governor Frank O'Bannon

PROFESSIONAL OFFICE SYSTEMS, INC.

4410 LAKE AVE.
FORT WAYNE, IN 46815
800-477-0848 • 260-426-6000

Oct 18, 2002

Dear Sirs,

We can't afford to lose more prime land in Indiana. I favor selecting the I-70 and US41 Route for the new I 69 extension. Put freight back on a rail system where it belongs. I know the trucking industry doesn't want to hear this. 3.2.1

Roger Bruce
President

1018-013

email: posbruck@aol.com

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

DEAR PEOPLE IN CHARGE OF I-69

- THREE CONCERNS -

1) 50 - 100 - 200 YRS DOWN THE ROAD OUR FUTURE CHILDREN (YOUR CHILDREN) WILL NEED THE LAND USED BY NEW I-69

2) IMPROVE & FOLLOW EXISTING ROUTES UP DATE W. ROADS, NEW BRIDGES

3) POUR MONEY INTO BUILDING OUR RAIL ROAD BACK - PASSENGERS TRAINS IS THE ANSWER TO THE FUTURE. 3.2

Kindest Regards

RECEIVED
OCT 24 2002
SLA

1024-034

Name Charles L. Darton

Address 1550 BETHEL LANE

BLOOMINGTON IND. 47408

R.R. 2 – Box 665
Spencer, IN 47460
5 August 2002

Lyle Sadler, Project Manager
Indiana Department of Transportation
100 N. Senate Avenue, Room N855
Indianapolis IN 46204-2218

Dear Mr. Sadler:

I have been following the I-69 project now for forty years. I have always wondered why I-69 stopped at Indianapolis, and did not continue on its southwestward direction towards Houston. I recently traveled in western Kentucky on a highway that was identified as "future I-69."

As a whole, the Interstate Highway System is greatly out-of-date, not in design, but in keeping up with increased numbers of vehicles that use it. When envisioned in 1956, the idea touted being able to drive coast to coast without a single traffic light. No one imagined what the usage would be today, 46 years later.

I have traveled the wide Old World and even with its flaws, the American system of highways is far advanced of most of the world. Since obtaining my first license in 1962, I figure I have driven somewhere near 2 million miles, most of which have been within 300 miles of Indianapolis. I still continue to drive 30-50,000 miles per year.

Now, there seem to be so many narrow-minded folks out here in Owen County and elsewhere who seem dead-set against progress. A group identified as C.A.R.R. (Citizens for Appropriate Rural Roads, I believe) states that the only route that should be considered is by using I-70 and US 41, and thus not using any new terrain. You and I both know that US 41 cannot be replaced. 41 will have to remain for locals to use in commuting to and from work, shopping, etc. An Interstate would have to parallel US 41 and still take "new terrain." And the terrain alongside 41 is among the most fertile farmland in Indiana.

I would think that a route that would utilize the forever-scarred coal mining land and already existing state-owned land would be among the most economical and sensible routes. There are thousands of acres in southwestern Indiana that, thanks to coal mining, are nothing more than piles of rock-strewn earth and polluted streams and lakes that can grow nothing for the next few centuries. 3.2.1

0805-019

On another note, some sort of long range planning should be underway to try to alleviate the congestion in and around Indianapolis. A wide outer loop should be constructed to allow through traffic from I-65, 69, and 74 to use without backtracking. I-70 would continue on through the heart of the metro area. A loop that starts about Anderson, heads south to the east of Greenfield, to near Shelbyville (perhaps near the new race track), west to I-65 and US 31 between Franklin and Edinburgh, on to Martinsville, then north, paralleling SR 39 to Lebanon. A northern leg from Lebanon to Anderson would not only help I-65 to I-70 E and I-74 E, but would greatly help the fastest growing area of Indiana.

Being the son of a civil engineer, I have a lot of ideas on how intersections / interchanges might be designed or improved, but lack the expertise in getting the idea across. Is there any place I might send ideas?

Sincerely,

Alan Mills

I-69 HOTLINE COMMENTS

9/5/02 This is Joseph P. Hopkins, RR2 Box 230, Loogootee, Indiana 47553. I wish to comment on I-69. Where I think it should be is Davies County. Begin at the Crane entrance, go south past Kregelsville(?), Glendale, Channelburg(?), Algiers and onto highway 57. This route is mostly strip mine land and it's not good farming land. It was stripped and there is very little trees and not too many houses. Please don't let the greedy people of western Davies County influence you. Thank you. 3.2.1

0905-008 Hopkins, Joseph.wpd

Subj: DEIS Comments
Date: 9/9/02 11:45:48 PM EST
From: ezform@networkwcs.com
Sender: webnobody@pepe.cinergycom.net (Anonymous Web User)
To: mgrovak@aol.com

Name = Dennis McNichols
Address = 1130 N. Leland Avenue
City = Indianapolis
State = IN
ZIP = 46219
Email = dennismc@iquest.net
Message = I69 need NOT go THROUGH Indianapolis at all. If it does, it will bring more pollution, more road congestion, and more traffic deaths.

A much better solution is this: extend I69 south from Fortville around the far east side of Indianapolis, and then on south around Indianapolis. In addition, ad an extention from the south to I465. This solution will accomplish the following: 3.2.1
1) The above mentioned negatives will be avoided.
2) Travelers not intending to stop in Indianapolis will enjoy more of a straight-a-way.
3) Travelers going to or from Indianapolis will still be able to do so via the access to I465.
4) Because I69 will be accessible east and south of Indianapolis (as well, of course, as north) more possible routes from Indianapolis to I69 south will exist resulting in fewer people being uprooted, and fewer dollars having to be paid for land.

I465 should have been built much further out than it was. Don't compound the mess by bringing north/south through traffic into Indianapolis thereby making things even worse.

0909-002 McNicols, Dennis.wpd

Mr. Mike Grovak, Project Manager
Bernardin and Lochmeuller & Associates
6200 Vogel Road
Evansville, IN 47715

Nov 3, 2002

Dear Mr. Grovak.

The attached copy of your Appendix D "Sensitivity Analysis and Screening Methodology" from the I-69 Tier 1 Draft Environmental Study is so fraught with faulty logic, new terrain I-69 route bias and over-the-top subjectivity entire I-69 route evaluation is an embarrassment to the taxpayers.. 3.3.1

The lofty project goals and Core Values created by InDot and BLA to be met by the chosen I-69 extension apply equally to all routes in the study including the US41/I-70 (Route 1). By the way, US41/I-70 route is far less expensive to build, takes fewer businesses, fewer farms and forest acres, fewer homes and has far fewer environmental problems than any new terrain route.

The more "concise goals" for I-69 set by the FHWA as published in the federal Register Vol. 65, Number 237, Dec. 8, 2000 are also amply met by the US41/I-70.

Yet the InDot and BLA participants in the evaluation process as described in Appendix D of the DEIS, manufactured combinations of Core Values, evaluation goals and assigned subjective weights, the US41/I-70 route scored no higher than 19th out of twenty. Bunk.

InDot misrepresented of length of SR 37 to the Federal Government's for the recent National Highway System (NHS). Surely InDot would know Indiana SR 37 has been improved far south beyond Bloomington to Mitchell, Indiana. This fact should have been included in the NHS and influenced conclusions in the DEIS as well. This is also true for the committed funds for 461 around Terre Haute connecting I-70 and US41 while avoiding Terre Haute traffic. Why was this left out of the analysis?

When complex analyses combine distorted information and severe institutional bias (InDot's and BLA's), it is certain the conclusions will be predictable and faulty. The Sensitivity Analysis and Screening Methodology is ample proof the Route Evaluation for I-69 was biased beyond any reasonable measure and should be discarded.

Sincerely,

Clark Sorensen
8099 S. Breeden Rd.
Bloomington, IN 47403.

CC: Citizens for Appropriate Rural Roads, Stamford, Indiana 47463

1103-017

Draft Level 2 Alternatives Analysis Report
Task 5.3.5

Appendix D
Sensitivity Analysis and Screening Methodology

INTRODUCTION

As documented in the Draft Purpose and Need Statement, there are many needs in Southwest Indiana which the I-69 project could address. There area several dozen performance measures associated with these needs. The cost of each alternative (both capital and ongoing operating and maintenance) also are major factors in the comparison of alternatives. In addition, geographic diversity is a criteria in alternative selection.

This gives rise to several related questions. These include:

- How sensitive is this analysis to the relative importance (weight) assigned to different decision criteria? Are the results fairly consistent if a wide variety of weights are assigned to the different decision criteria? Or, do the results of the analysis vary, depending upon the relative weight given to various criteria?

- How sensitive are the results to geographic grouping? There are different ways in which routes can be grouped geographically. Can the results be significantly affected by how routes are grouped geographically.

In order to answer these questions, a ***sensitivity analysis*** was performed as part of the analysis leading up to the Screening of Alternatives. As described below, the analysis showed that there was a great degree of consistency in rankings of routes under a wide variety of assumptions.

DEFINITIONS

In order the understand the sensitivity analysis, a few key definitions are in order:

Sensitivity Analysis - a comparison of results obtained in an analysis under a variety of assumptions. An analysis scheme is said to be *robust* if it produces similar results given a wide variety of assumptions.

Route Score – an aggregate or weighted average score between 0 and 100 that summarizes the performance of an alternative. The score considers all the performance families *and cost factors* (i.e., capital and O&M) discussed in the main text of this screening report.

Weighting – the process of multiplying the composite score associated with a performance family with a value indicative of the relative importance of the performance family or cost. In addition to the application of weights to performance families, weights may be applied to the three overarching goals of I-69: transportation, economic development, and national I-69 objectives.

Scenario – A set of assumed weights and the route scores and rankings associated with those weights.

Geographic Grouping – A grouping of the 19 routes (i.e., 14 plus options) into "core groups" based on some common element of the routes' geography. It is possible to conceive of several different geographic groupings; for example, routes grouped by the highway corridors used to approach Evansville, or routes organized by broad geographic region.

Core Group – Two or more routes with a common element based on the geographic grouping's organizing principle (e.g., routes that approach Evansville using US 41).

Sensitivity Analysis

The sensitivity analysis sought to determine whether routes consistently have high route scores, regardless of scenario and geographic grouping. When they do, the analysis can be described as robust. If the overall ranking of routes varies significantly, depending upon the scenario, then very careful judgments must be made regarding the importance of different criteria.

The geographic groupings are significant given INDOT's policy directive to carry forward a geographically diverse set of alternatives for Level-3 analysis. This policy of geographic diversity should ensure the selection of a set of route concepts that respects the wide diversity of both public input and natural resources that exist in southwestern Indiana.

The significance of considering alternative scenarios is designed to ensure that the routes carried forward for detailed study are not dependent on a single set of values with respect to the performance families and cost factors described earlier.

The methodology uses the following iterative, five-step process.

- Categorize each route concept into core groups based on a logical geographic grouping.
- Compute route scores based on a reasonable weighting scenario and rank the routes based on their respective route scores.
- Note the route within *each core group/geographic grouping* with the best (lowest) rank.
- Repeat steps (1) through (3) for a reasonable range of scenarios and geographic groupings.
- Identify the top-performing route concepts that most frequently achieve the lowest ranking across several scenarios and geographic groupings.

Geographic Groupings

There are several ways that the route concepts could be grouped. A total of five such groupings were developed that provide a wide spectrum of approaches to the grouping question. These groupings are listed below. The list includes a brief description of the organizing principle around which the groupings were developed. It also identifies the core groups that comprise each geographic grouping. The list is color-coded to assist the reader in picking out the high-scoring routes in each grouping.

Geographic Grouping A: Organized by highway corridor utilized

Core Group 1: Mostly direct routes between Indianapolis and Evansville – B1, B2, F1, F2, G, H1, H2, K
Core Group 2: Routes utilizing a significant amount of US 41 – A, C1, C2, D, E
Core Group 3: Route utilizing a significant amount of I-70 – I, J
Core Group 4: Routes utilizing a significant amount of I-64 – L1, L2, M, N

Geographic Grouping B: Organized by approach to Evansville
Core Group 1: Routes approaching Evansville by US 41 – A, B1, B2, C1, C2, D, E
Core Group 2: Routes approaching Evansville by SR 57 – F1, F2, H1, H2, I, J, K, L1, L2
Core Group 3: Routes approaching Evansville by I-64 – G, M, N

Geographic Grouping C: Organized by approach to Indianapolis
Core Group 1: Routes approaching Indianapolis by I-70 – A, B1, C1, E, F1, G, H1, I, J, L1, M
Core Group 2: Routes approaching Indianapolis by SR 37 or I-65 – B2, C2, D, F2, H2, K, L2, N

Geographic Grouping D: Organized by broad geographic corridor
Core Group 1: Western routes – A, B1, B2, C1, C2, D, E
Core Group 2: Central routes – F1, F2, G, H1, H2, I, J, M
Core Group 3: Eastern routes – K, L1, L2, N

Geographic Grouping E: Organized by areas served
Core Group 1: Predominantly western – A, E
Core Group 2: Western-Central-Eastern – C1, C2, D
Core Group 3: Central – I, J, M
Core Group 4: Central and Eastern – B1, B2, F1, F2, G, H1, H2, K
Core Group 5: Eastern - L1, L2, N

Scenarios

A total of five scenarios covering the range of reasonable value weights were examined. A description of each alternative is as follows:

Scenario 1: All ten performance families weighted equally with the two cost categories weighted at half the value of a performance family
Scenario 2: All ten performance families weighted equally with the two cost categories weighted equally (i.e., as two performance families)
Scenario 3: The three "core objectives" (i.e., travel time savings, personal accessibility, and I-69 interstate/international trade) double-weighted with all other performance families plus the two cost categories weighted equally
Scenario 4: The three basic "need/purpose concerns" (i.e., transportation, economic development, and national I-69 goals) plus the two cost categories weighted equally

Scenario 5: The two primary "need/purpose concerns" (i.e., transportation and national I-69 goals) double-weighted with economic development and the two cost categories weighted at parity

Tables 1-5 on the following pages summarize the results of the five scenarios. There is a table for each scenario. In each table, the rows provide information on each of the routes. The routes (rows) are ranked in order from best score to poorest. To the right of the route score and route ranking columns, each column corresponds to a geographic grouping. Under these column headings, the numbers that appear in each cell correspond to the core group number (see above) for that route as it is designated within that particular geographic grouping.

The best-ranking route within each core group is color-coded using the color scheme (shown above) associated with that geographic grouping. In other words, as the reader scans the column from top to bottom, the first time that a specific core group number appears, it has been color-coded. This denotes the best-ranking route in that core group.

Table 1: Scenario 1 Route Scores and Ranks

Route Concept	Route Score	Route Ranking	Geographic Groupings A	B	C	D	E
F2	100.00	1	1	2	2	2	4
H2	93.99	2	1	2	2	2	4
B2	86.26	3	1	1	2	1	4
L2	79.60	4	1	2	2	1	5
H1	76.68	5	1	2	1	2	4
F1	73.66	6	1	2	1	2	4
C2	72.14	7	2	1	2	1	2
K	71.42	8	1	2	2	3	4
B1	71.15	9	1	1	1	1	4
N	69.64	10	4	1	2	3	5
L1	68.21	11	4	2	1	3	5
G	62.18	12	1	3	1	2	4
D	58.69	13	2	1	2	1	2
J	59.07	14	3	2	1	2	3
I	57.23	15	3	2	1	2	3
C1	55.27	16	2	1	1	1	2
M	49.16	17	4	3	1	2	3
A	29.08	18	2	1	1	1	1
E	28.85	19	2	1	1	1	1
NB	0.00	20	-	-	-	-	-

Table 2: Scenario 2 Route Scores and Ranks

Route Concept	Route Score	Route Ranking	Geographic Groupings A	B	C	D	E
F2	100.00	1	1	2	2	2	4
H2	93.23	2	1	2	2	2	4
B2	84.19	3	1	1	2	1	4
L2	77.20	4	1	2	2	1	5
H1	73.66	5	1	2	1	2	4
F1	71.23	6	1	2	1	2	4
C2	69.35	7	2	1	2	1	2
B1	67.20	8	1	1	1	1	4
N	66.90	9	4	1	2	3	5
K	66.85	10	1	2	2	3	4
L1	64.21	11	4	2	1	3	5
G	58.35	12	1	3	1	2	4
J	55.66	13	2	1	2	1	3
D	55.11	14	2	1	2	1	2
I	54.98	15	3	2	1	2	3
C1	52.43	16	2	1	1	1	2
M	46.66	17	4	3	1	2	3
A	28.42	18	2	1	1	1	1
E	23.88	19	2	1	1	1	1
NB	0.00	20	-	-	-	-	-

Note: In Geographic Grouping A, Route "A" could be grouped in core group 2 or 3. For purposes of this analysis, it has been included in core group 2. Routes in bold have at least one first-place rank.

Table 3: Scenario 3 Route Scores and Ranks

Route Concept	Route Score	Route Ranking	Geographic Groupings A	B	C	D	E
F2	100.00	1	1				4
H2	93.07	2	1	2	2	2	4
B2	83.00	3	1		2		4
H1	78.29	4	1	2		2	4
L2	77.79	5	4	2	2		5
F1	76.81	6	1	2	1	2	4
C2	70.04	7	2	1	2	1	2
B1	69.94	8	1	1	1	1	4
K	69.73	9	1	2	2	3	4
L1	67.81	10	4	2	1	3	5
N	67.37	11	4		2	3	5
G	62.02	12	1	3	1	2	4
J	58.84	13	3	2	1	2	3
I	56.46	14	3	2	1	2	3
C1	55.20	15	2	1	1	1	2
D	55.02	16	2	1	2	1	2
M	48.76	17	4	3	1	2	3
A	29.05	18	2	1	1	1	1
E	28.45	19	2	1	1	1	1
NB	0.00	20	-	-	-	-	-

Table 4: Scenario 4 Route Scores and Ranks

Route Concept	Route Score	Route Ranking	Geographic Groupings A	B	C	D	E
F2	100.00	1	1				4
H2	86.20	2	1	2	2	2	4
B2	85.82	3	1		2		4
F1	81.61	4	1	2		2	4
L2	58.32	5	4	2	2		5
H1	55.48	6	1	2	1	2	4
C2	50.42	7	2	1	2	1	2
N	47.34	8	4		2	3	5
I	46.87	9	3	2	1	2	3
K	41.97	10	1	2	2	3	4
C1	41.15	11	2	1	1	1	2
B1	40.32	12	1	1	1	1	4
J	38.33	13	3	2	1	2	3
L1	37.34	14	4	2	1	3	5
A	36.44	15	2	1	1	1	1
M	35.31	16	4	3	1	2	3
G	34.35	17	1	3	1	2	4
D	21.16	18	2	1	2	1	2
NB	18.57	19	-	-	-	-	-
E	0.00	20	2	1	1	1	1

Table 5: Scenario 5 Route Scores and Ranks

Route Concept	Route Score	Route Ranking	Geographic Groupings A	B	C	D	E
F2	100.00	1	1				4
H2	68.44	2	1	2	2	2	4
B2	75.19	3	1		2		4
F1	74.03	4	1	2		2	4
H1	71.54	5	1	2	1	2	4
L2	70.22	6	4	2	2		5
K	66.20	7	1	2	2	3	4
C2	63.01	8	2	1	2	1	2
B1	60.49	9	1	1	1	1	4
N	58.15	10	4		2	3	5
L1	56.03	11	4	2	1	3	5
I	53.45	12	3	2	1	2	3
C1	52.96	13	2	1	1	1	2
J	52.36	14	3	2	1	2	3
G	51.23	15	1	3	1	2	4
D	42.10	16	2	1	2	1	2
M	40.25	17	4	3	1	2	3
A	29.49	18	2	1	1	1	1
E	18.90	19	2	1	1	1	1
NB	0.00	20	-	-	-	-	-

Table 6: Tabulation of Routes with First Place Rankings

Route Concept	Number of First Place Rankings
NB	-
A	6
B1	-
B2	10
C1	-
C2	10
D	-
E	-
F1	2
F2	25
G	-
H1	3
H2	-
I	4
J	8
K	-
L1	-
L2	15
M	-
N	5

Findings

Perhaps the most significant finding that comes to light in the preceding tables is the remarkable degree of consistency in the first-place rankings among all five scenarios. Table 6 summarizes the tabulation of first-place rankings by route. With few exceptions, the pattern is that routes either have several first-place rankings (both within core groups and across geographic groupings) or none at all. This is significant because it suggests that the "high performers" are not overly dependent on the weightings that one might ascribe to a particular performance family (or even related groupings of performance families).[1]

Also significant is the fact that typically (though not always) there is a fairly large difference in the route scores between first and second place rankings within the same core group. This fact suggests that a reasonable degree of confidence can be placed in a first-place ranking.

[1] This statement assumes that the analyst refrains from the use of extreme weights that would effectively hinge the entire screening process on one or two factors.

Another significant finding is that certain core groups tend to garner higher route scores than other core groups. Consequently, in order to achieve the goal of geographic diversity it is inevitable that some route concepts will be carried forward for further analysis that have lower scores than other routes that fall into a higher performing core group.

Conclusion

The preceding analysis demonstrates that the rating of routes under a wide variety of scenarios and geographic groupings yielded very consistent results. Specifically, routes tended to either *never* perform best within a geographic grouping, or to perform best within a geographic grouping several times.

Since the performance of routes was consistent under a wide variety of scenarios, the analysis which led up to the screening of alternatives in effect assigned a consistent weight to all criteria. As displayed in Table 6 of the main text, routes were grouped geographically, and then assigned an equal weighting which reflected how well they performed on each of the ten families of performance measures. Capital costs and ongoing operating and maintenance costs were also assigned an equal weight with each of the ten families of performance measures.

The five alternatives selected for detailed study (A, C, F, J, and L) have five of the six highest number of first-place rankings, as shown in Table 6 of this Appendix. This sensitivity analysis was conducted prior to the screening process in order to ensure that the screening decisions did not hinge on one narrow set of assumptions. The analysis minimized any questions along those lines and validated the robustness of the screening conclusions.

Malcolm
DALGLIS
812 333 0838 STUDIO & FA

September 12, 2002

Governor Frank O'Bannon
The Statehouse, Rm. 206
Indianapolis, IN 46204

Dear Governor O'Bannon:

Please stop any authorization or appropriation of monies for the proposed extension of I-69 from Indianapolis to Evansville until this new terrain route is abandoned.

I'm opposed to this highway for several reasons. This highway project, as currently proposed, will damage our farmlands, forestlands, wetlands and rural communities. Our productive farmland is too valuable to pave over for an estimated 8 minutes saving in travel time. The local roads that will be cut off will further divide our communities and the urban sprawl will create more problems for the independent family farms.

In our nation's current obesity epidemic we rank right up there near the top. Do we really need another endless sprawl of fast food chains and outlet malls just to save 8 minutes of travel time and provide a few more minimum wage jobs? Southern Indiana's greatest resource for the future may be it's beautiful woods and fields. Think, for example how much tourism might be enhanced by a rail to trail path from Indianapolis to West Baden Springs? The natural beauty of our state will be more successful attracting environmentally progressive industry to our state than a super highway. 4.3.1

Our country is losing farmland at a rate of about 2 million acres a year. We can no longer afford to squander our land in this way. Alternatives using existing roads that would be much less expensive to the taxpayers should be considered; for example, US 41 and I-70. Our tax dollars will be better spent on upgrading and improving existing road sand bridges rather than on building interstate highways using all new terrain. Indiana has many transportation needs and we cannot keep the roads we have in safe repair.

A recent study by an independent economics expert has shown that the project would return only 81 cents for every dollar spent. Indiana and the Nation would lose money on the project. We can no longer afford to squander our tax dollars on this kind of project while our local roads are in such poor repair. 3.4.1

Please stop the extension of I-69 using all new terrain and promote economically sound, less destructive transportation planning. Please let me know your thoughts on this issue.

Sincerely yours,

Malcolm Dalglish

0916-020

1111 E. WYLIE STREET BLOOMINGTON INDIANA 47401

719 Bexley Rd
W. Lafayette, IN 47906
October 30, 2002

Mr. Michael Grovak
Bernadin, Lochmuller & Associates, Inc
6200 Vogel Rd.
Evansville, IN 47715

Dear Mr. Grovak:;

It is inconceivable to me that the I-70 and U.S. 41 route for I-69 is being dismissed.

I am the retired Director of Redevelopment for the City of Lafayette. I have served on the Smart Growth Committee of our Vision 20/20 project and have been trained in urban and regional planning.

If this route is not thoroughly examined in your environmental study, I would press for a formal rejection of your study on the basis of incompetence and insufficient regard for the interests of Indiana and the rest of the country. 3.4.1

Sincerely,

Lillian Cote

Subj: DEIS Comments
Date: 8/26/02 10:00:38 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Richard A. Martin
Address = POBox 1297
City = Bloomington
State = IN
ZIP = 47402
Email = tinwisle@bloomington.in.us
Message = On August 20th I asked Vincent Bernardin why the data of Table S-6: Summary of Key Performance Measures and Environmental Impacts, did not correspond to the routes depicted on the Alternatives map. Both documents were included in the material given to participants in the Bloomington public hearing meeting. He stated that the map did in fact not correspond to the table data because the table data was derived from modeling analysis performed prior to the latest route alignment adjustments. In a follow-up question, I asked how the public is to be assured of the consistency of information that will be used as a basis for final route selection? To that question, Mr. Bernardin replied, "I don't know? We expect to update the DEIS report before final delivery." 3.4.1

To carry this inquiry further, how will INDOT audit the DEIS to assure the consistency of the information provided? Is an independent audit of the report to occur? If so, who will perform the audit?

0826-006 Martin, Richard.wpd

Subj: DEIS Comments
Date: 10/21/02 1:36:15 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = George W. Brutchen
Address = 306 West South St.
City = Winchester
State = IN
ZIP = 47394
Email = gbrutchen@globalsite.net
Message = 1) I would like to know what groups were worked with in determining what karst areas would be affected and how large the impact would be? I did not see this given in the DEIS. Blue Springs is not the only cave system in the area that would potentially be impacted. 5.24

2) In looking at the determination of alternative routes for consideration there appears to be an implicit assumption that putting an interstate extention through an area is going to lead to an overall improved economic development for that region. Since this appears to be a heavy weighting factor in the determination I would like to know what other studies have been used to demonstrate that this is a valid assumption. 3.4.1

1021-011 Brutchen, George.wpd

PUBLIC HEARING COMMENTS

David Schulte... I want to thank Mr. Brian Nicol and the INDOT staff for allowing the public to comment on this extensive study undertaken. Studies one of the most extensive completed for a major infrastructure project. The extension of I-69 corridor is vital to the southwestern region of Indiana. As an employee of NSWC Crane I understand the impediments we face in the southwestern part of the state in delivering our goods required to support the military forces defending the United States. Establishment of I-69 near to Crane will be a significant asset and increase in our Military value. Two factors will be influenced if the construction is planned near Crane. One it's location will enable and increased efficiency in the transportation of goods, two our Military value will be heightened. Military value will be one of the determining factors in the upcoming base realignment and closure or BRAC process to be undertaken in 2005. Although the location of I-69 near Crane will not guarantee that the base will stay open it will significantly enhance our position. Since September 11th 2001, the army and navy commands at Crane have made over 42 thousand shipments in support of our forces. These shipments have included sophisticated guiding systems, night vision, radars and electronic jamming equipment. Crane employs over four thousand army and navy civilian employees in challenging good paying jobs, it also employees over four hundred private sector engineering and technical contractors to support the efforts there. The impact is widely felt in technology areas that major research centers like IU, Purdue and Rose Hulman. A modern service transportation infrastructure will greatly assist in accomplishing the bases mission. I urge INDOT to select a route for I-69 that is located close to the Navy Base. Thank you very much. 3.4.2

0820-099 Schulte, David.wpd

PUBLIC HEARING COMMENTS

Brian Blackwell... Thank you. I'm an employee of the Naval Service Warfare Center located in Crane Indiana. For those of you who don't know, Crane is the 12th largest single site employer in the State. I'm also President of the Crane Chapter of Federal Managers Association and as I've discussed this project over the last week with our many members I found overwhelming support. There's also a strong desire to have the highway located near Crane in order to provide greater productivity and accessibility. This improved infrastructure will be key to Crane's continued support for military forces. Since 9-11 over 42 thousand shipments have been made in support of our forces, all of this largely in spite of our aging infrastructure. I-69 will help enhance our mission effectiveness. Additionally 50 thousand people visit Crane each year. The I-69 project will greatly improve Crane's accessibility with more direct route from Evansville, it is conceivable that many visitors would elect to use this route. As Mayor Lloyd stated earlier this would strengthen the connection between Evansville and MSWC Crane, it would most certainly result in a positive economic impact for the Evansville area. I respect the opinions of others in regards to this project. Above all I'm very thankful for the freedom we all enjoy to come here and express our opinions. It's my hope that the I-69 project will help Crane better support our military forces in the defense of these freedoms. Thank you. 3.4.2

0821-208 Blackwell, Brian.wpd

Subj: I-69 Highway EIS Comments
Date: 11/7/02 4:58:26 PM EST
From: gmcmanus@Vectren.com (McManus, Gregg)
To: bnicol@indot.state.in.us ('bnicol@indot.state.in.us')
CC: gmcmanus@Vectren.com (McManus, Gregg)

To: INDOT Commissioner Brian Nichol and Mike Grovak, Bernardin, Lochmueller & Associates
From: Gregg McManus
Re: INDOT's Draft EIS concerning the Route for I-69

Reviewing the EIS draft the Indiana Department of Transportation released in August of this year, I'm pleased at the effort and analysis demonstrated in the report. INDOT's findings demonstrates the Department's attention to fulfilling the Purpose and Need for the I-69 Highway in Indiana. The goals of economic development, safety, connectivity, and transportation efficiency are all advanced by the alternatives the draft EIS recommends.

I would concur with INDOT's EIS draft concerning the I-70/41 corridor as the least desirable alternative for a number of reasons:

1. Terre Haute and the towns nearby already possess Interstate I-70, placing them only an hour away from the Indianapolis airport. More can and should be done to leverage that asset.

2. From strictly an Indiana perspective, it would appear much more beneficial to the State to place I-69 directly through the core of Southwest Indiana where the highway has the greatest potential for delivering benefits to as many Hoosier citizens as possible. Placing the new interstate on the 41 corridor along Indiana's western border will have the effect of throwing a portion of the highway's benefits into Illinois, while leaving the core of Southwest Indiana isolated and its desperate transportation needs unmet. I noted that INDOT's own analysis shows that a highway oriented more directly towards Evansville from Indianapolis places thousands more people closer to Indianapolis than the I-70/41 route. 3.4.2

3. A point often overlooked in the INDOT hearings to date is that the I-69 Highway will not always be used by people from the Evansville region for travel to an Indianapolis destination. In fact many Evansville originated trips are to Bloomington, or destinations to the east of Bloomington or even east of Indianapolis. Unfortunately, INDOT's time and distance comparison between a direct route versus the I-70/41 route fail to consider the extra driving time it would take to reach destinations from Evansville to locations south and east of Indianapolis. For example, few students from Evansville would take the I-70/41 route to Indianapolis and then proceed to Indiana University down 37. Many people will continue to use the unsafe rural roads to reach these place since a I-70/41 route would fail to shorten travel time and distance. 3.4.3

4. I would like to point to a study by several Evansville engineers and appraisers two years ago when they examined the cost for two routes. This study was conducted by James Q. Morley, P.E., president, Morley & Asociates,Inc., Michael J. Feltz, P.E., Clark Dietz, Inc. and C. David Matthews, MAI, CRE, SRA, David Matthews Associates. Its purpose was to produce a factual comparison of engineering, right-of-way and relocation costs, and to evaluate the impact on citizens along each route. Their study is worthy of your attention. It concludes by stating that a direct route and a 41/I-70 route would be very close in their costs. If so, then the state could spend roughly the same amount of money and have two highway systems serving the transportation needs of Southwest Indiana. But, if INDOT used the I-70/41 route it would have only one highway system in Southwest Indiana that leaves a large potion of Southwest Indiana unserved.

5. One issue that deserves more attention than it has received so far is this: If 41/70 is turned into an interstate, what happens to traffic patterns between Evansville and Indianapolis during the five, seven or even ten years the Highway is under construction? It appears the delays and obstacles that could be present during this lengthy period of time, would shift even more traffic on to the rural roads of Southwest Indiana, making them even less safe and less efficient than they are now. 5.12

I believe INDOT may have erred in the way it compared the cost of the I-70/41 alternative with a more direct route. Apparently, INDOT did not take into account the cost of adding the lanes to I-70 needed when the I-69 traffic is added to the I-70/41 route in its cost comparison. We understand the cost of two lanes was not included because two more lanes will need to be added eventually anyway. This missing cost element in route comparisons creates two problems: Politically, it gives ammunition to direct route opponents with sound bytes that the direct route is more expensive. So many radio and print ads sponsored by direct route opponents have touted a direct route as the most expensive

alternative that there is a great deal of misunderstanding by the public about the the true costs involved. This has begun to influence citizens and public officials who now believe the I-70/41 alternative is "least cost".

A final dimension of cost comparison should also include the cost savings to people and vehicles for a more direct route that saves time, reduces depreciation and fuel use. Direct route opponents have made much of construction cost comparisons. However, a cost that is often over looked as part of the route decison is the cost incurred with putting a dog-leg alignment into the Highway system, that departs from a more efficient straight-line design. How much more fuel, rubber, depreciation and time will be wasted when multiplied millions and millions of times over the course of decades by the vehicles using it.

If INDOT did merge I-69 traffic together with I-70 traffic to Terre Haute, wouldn't it more likely create the need for FOUR more lanes? Conversely, some of the traffic pressure currently on I-70 west would be relieved with a more direct I-69 route to Evanville and the need for additional lanes delayed.

The Case for a more Direct Route from Indianapolis to Evansville:

1. A more direct route that follows existing highways 57, 45 and 37 appears to hold the greatest potential for capturing the benefits outlined in the Purpose and Need Study. Such a route would incorporate into its alignment between Indianapolis and Evansville, the greatest degree of transportation efficiency.

2. Even a cursory look at the direct route demonstrates that INDOT is correct in its assessment that a more direct route provides the greatest level of connectivity with more Hoosier citizens to Indiana's capital city.

3. A more direct alignment along Highways 57, 45 and 37 provides the greatest accessibility to resources associated with the Crane Naval Surface Warfare Center, Indiana University, agricultural produce, coal fields, power plants, the third largest city in Indiana, with its manufacturing base and the nearby port on the Ohio River. Add these linked resources to the context of I-69 as an International Highway; Indiana will then possess an economic asset with greater potential than any of its existing interstates.

4. While the state should certainly be excited about the economic opportunity a direct route holds, the safety of the traveling public will be substantially increased. Current Southwest Indiana roads are crowded with school buses, propane trucks, coal trucks, farm equipment, passenger cars, Amish buggies and over-sized loads. Without I-69 through the core area, these rural roads will become even more crowded with an inappropriate mix of traffic traveling at different speeds, size and purpose on roads that were not designed to handle such conditions. These existing roads will become increasingly dangerous.

Another aspect of safety that I-69 delivers may result on four-lane Highway 37. If some of the traffic currently pouring onto Highway 37 to and from Bloomington can be redirected to I-69, some of the danger and congestion currently along Highway 37, can be reduced. It would be worthwhile if INDOT investigated the positive benefits to the Bloomington community with the introduction of the Interstate. It is quite possible the Bloomington and Martinsville communities will be better positioned to avoid the "sprawl" certain locals fear, if the traffic and population pressure they currently experience is reduced along the 37 corridor.

5. The "Voices for I-69" organization, of which I am member, was advised a few years ago to ultimately plan this Highway with a sense of vision about what we wanted the Highway to be and what we want it to do. Therefore, the Highway should not be constructed on the assumption that economic growth, maximum connectivity, safety and other benefits will naturally occur simply by the highway's existence. Instead, we were encouraged to plan where the interchanges might best be placed for maximum benefit and the minimization of environmental impact. Our advice to INDOT is to convey this concept to the Indiana public so that they understand that greater value can be achieved and more objectives met if thoughtful planning is put into its ultimate layout and design. For example the infrastructuring and marketing of key interchanges can help the state attract high value jobs and industry. At the same time, other interchanges with access to green/tourist areas, perhaps should not have the kind of infrastructure or be zoned for industry.

I would like to thank INDOT for the opportunity to submit these thoughts about their draaft EIS that clearly reflects so much dedicated effort. I look forward to INDOT's final decision and expeditious movement toward the Highway's construction.

Gregg McManus, an interested Indiana citizen

1107-161 McManus, Greg.wpd

August 20, 2002

R# 1 Box 272
Bloomfield, IN 47424

Mr. Bryan Nicol
Commissioner (Room N755)
Indiana Department of Transportation
100 North Senate Ave.
Indianapolis, IN 46204-2249

Dear Mr. Nicol,

I want to thank Mr. Bryan Nicol and the INDOT staff for allowing the public to comment on this extensive I-69 study undertaken. This study is one of the most extensive studies completed for an infrastructure project. The extension of the I-69 corridor is vital to the southwestern region of Indiana.

I recognize that there are polarized camps with diverging philosophies on the need for such a project. In spite of us living in a communications age, surface transportation of goods is as vital as transportation of data. They are integral to supporting economic activity.

As an employee of NSWC Crane, I understand the impediments we face in the southwestern part of Indiana in delivering our goods required to support the military forces defending the United States. Establishment of I-69 near to Crane will be a significant asset in increasing our military value to this country. Two factors will be influenced if the construction is planned near Crane. One, its location will enable an increased efficiency in the transportation of goods. Two, our military value will be heightened. Military value will be one of the determining criteria in the upcoming Base Realignment and Closure or BRAC process to be undertaken in 2005. Although the location of I-69 near Crane will not guarantee that the base would stay open, it would significantly enhance our position in BRAC. 3.4.2

Since September 11, 2001, the Army and Navy commands have made over 42,000 shipments. These shipments included sophisticated guidance systems, special weapons, night vision and chemical biological detection devices, radars and electronic jamming equipment. 3.4.2

Crane employs over 4000 Army and Navy civilian employees in challenging, good paying jobs. It also employs over 400 private sector engineering and technical contractors that support the efforts there. The impact is wide felt in technology areas at major research centers like IU, Purdue and Rose Hulman. A modern surface transportation infrastructure will greatly assist in accomplishing the base's mission. 3.4.2

0820-225

I urge INDOT to select a route for I-69 that is located close to the base. Thank you.

Respectfully,

David C. Schulte

Subj: DEIS Comments
Date: 8/23/02 12:12:19 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Dale L. Groh
Address = Box 392
City = Bedford
State = IN
ZIP = 47421
Email = groh_dale@crane.navy.mil
Message = I have been contracted to develop an Ordnance Master Plan for NSWC Crane Division. After two years of effort, it appears that Crane will become within 10 years, the premier ordnance related activity in the United States. As such, the business of moving ordnance to and from Crane to the Joint Warfighters will become very intense. Our current road system does not readily support such movement. What will be needed is a better path from Interstate higways to our planned "Ordnance Gate" which will be on the west side of the current base. The propsal to have I-69 pass close by the northwest corner of Crane would meet our needs very well. It would also reduce the risks associated with moving ordnance on two lane country types of roadways as it now uses. These are commercial movements of explosives. The future will see the reduction of ordnance activities due to the conditions of facilities that were constructed during WWII. Crane is in a better position than most because the other activities are either in conjested suburban areas or are in bad shape due to age. 3.4.2

0823-007 Groh, Dale.wpd

Subj: New I-69 Study Form Feedback
Date: 9/13/02 1:06:10 PM EST
From: ckrjr@yahoo.com (charles k ramsden jr linda d ramsden)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

charles k ramsden jr linda d ramsden
r1 bx 1708
springville , IN 47462-9629

Message:
INDOT
I WILL ADD OUR COMMENTS TO THE MANY I KNOW YOU HAVE RECEIVED REGARDING THE PROPOSED I 69 EXTENSION.
MY SPOUSE AND I ARE OPPOSED TO EXTENDING I 69 UNLESS THE ROUTES USING (OUR 1ST CHOICE) -> I 70/HWY 41 OR (OUR 2ND CHOICE ->) THE WY 37/HWY 50 ALTERNATIVES ARE USED. WE HAVE REVIEWED THE RECENT DRAFT STUDY AND FIND THE OTHER ALTERNATIVES NOT DESIREABLE, PARTICULARY WITH THE LARGE AMOUNTS OF NEW CONSTRUCTION REQUIRED AND THE ADVERSE IMPACT WE FEEL THIS WOULD HAVE ON THE AREAS THE HIGHWAY WOULD PASS THROUGH. FURTHERMORE THE ROUTE USING HWY 37/HWY 50 WOULD INCLUDE BEDFORD IN THE INTERSTATE ROUTING AND WOULD SEEMINGLY ALSO MEET THE POSSIBLE FUTURE NEED OF UPGRAGING HIGHWAY 50. ALTHOUGH I NOTED THE IMPACT TO CRANE WAS NOT MENTIONED IN THE RECENT DRAFT STUDY FOR USING THIS HIGHWAY 50 ROUTING SOUTH OF CRANE IT IS CLEAR IT WOULD COME ABOUT THE SAME DISTANCE FROM CRANE AS THE NEW CONSTRUCTION ROUTING OF ALTERNATIVE 3. I REALIZE THE NORMAL ACCESS TO NWSC CRANE FOR TRUCKS IS THROUG THE CRANE GATE AND TO A LESSER EXTENT THROUG THE BLOOMINGTON GATE, BUT KNOW IF THE ACCESS TO THE CENTER IS AS IMPORTANT AS STATED THE FACILITY AT CRANE WOULD AND COULD MAKE THE CHANGES TO SHIFT TRUCK ENTRY POINTS TO ACCOMADATE THE HIGHWAY WITH MUCH LESS TROUBLE THAN THE MANY PEOPLE THAT WOULD BE EFFECTD BY THE MORE DISRUPTIVE NEW CONSTRUCTION ALTERNATIVES THROUGH GREENE COUNTY. LIKEWISE THIS WOULD GIVE CRANE THE REASON THE IMPROVE IT SOUTHSIDE ACCESS THAT WOULD HELP THE AREA BE A MORE DESIREABLE AREA FOR FUTURE CRANE EMPLOYEES TO LOCATE AND PROVIDE THE DEVELOPEMT TO THAT AREA THAT SOME I 69 SUPPORTER SAY IS SO NEEDED IN THE POORER AREAS OF SOUTH INDIANA. IN ADDITION SINCE IT APPEARS THERE IS AN INTENT TO IMPROVE THIS PART OF HIGHWAY 50 IN THE FUTURE THIS WOULD ALLOW THAT GOAL TO BE MET AND AT LEAST WOULD INVOLVE IMPACTING THE AREA SOUTH OF CRANE ONLY INSTEAD OF AREAS ON BOTH THE NORTH AND SOUTH SIDE OF CRANE. 3.4.2
IF NEITHR THE I 70/HWY 41 OR HWY 37/HWY 50 ROUTE CAN BE FOUND ACCEPTABLE THEN IT IS OUR POSITION THE BAD VERSUS GOOD OF THE I 69 EXTENSION MAKES THE "NO BUILD" DECISION THE ONLY REASONABLE CHOICE.

PLEASE SEND US THE SPECIFIC INFORMATION REQUESTED BELOW.

(1) INFORMATION ON THE PROCESS OF PROPERY CONDEMNATION, PROPERY VALUE DETERMINATION, EMINET DOAMIN, AND THE PROPERTY OWNERS RIGHTS AND OBLIGATIONS IN THE ACTIONS;
(2) AND THE SCHEDULES (BEGINING DATES) UPON WHICH THIS PROPERY PURCHASE ACTIONS WILL BEGIN IF A BUILD ALTERNATIVE IS MADE.

PLEASE PUT US ON THE INDOT I 69 UPDATE MAIL LISTING.

0913-019 Ramsden, Charles.wpd

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW. USE THE REVERSE SIDE, IF NECESSARY.

My name is Roberta Hoff. I have a suggestion on the phrasing of travel time saving that I have seen in your reports. Instead of saying that a route saves so many minutes of travel time, say that the route saves so many dollars. The mileage times the government allowed 34½ cents would make a more vivid illustration. For example if the route saves 14 miles the 14 times 34½ cents would be $4.83 per one way trip. 3.4.3

If this is mileage saving put a dollar and cents value to it.

Hearing that I would save $4.83 each time I drive to or from Indianapolis means more to me than a saving of time.

(continue on other side)

0911-051

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW. USE THE REVERSE SIDE, IF NECESSARY.

THE MANN RD. OPTION ALT. 2 OPT C1 WOULD NOT BE A GOOD ROUTE BECAUSE THE WHITE RIVER VALLEY FOGS OVER SEVERELY AT TIMES. IT IS ALSO A VAST FLOOD PLAIN, ESPECIALLY AROUND THE WAVERLY INDIANA AREA IT ALSO WOULD BE DESTROYING PRIME FARMLAND & HISTORIC HOMES. I SUPPORT A NO BUILD PLAN OF I-69 3.4.3

(continue on other side)

0916-022

Subj: New I-69 Study Form Feedback
Date: 8/16/02 10:07:00 AM EST
From: gbrannon@indy.rr.com (Glen G.)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Glen G.
7129 Kimberly Lane
Plainfield, IN 46168

Message:
I am a regional truck driver.Has a study been done to determine the number of steep grades needed or planned on the perferred routes? If there are alot of them, with truck speed limits set at 60 mph, it would take trucks longer to climb (and descend at lower gearing and speed). Therefore, some drivers would by-pass the perferred routes and take a flat I-70/US 41 route. 3.4.3
This would be real true in winter time conditions where snow and ice would make the perferred route too risky to take.

Thank you for your time.
Glen Brannon
gbrannon@indy.rr.com

0816-007 Brannon, Glen.wpd

8/5		I am a taxpayer and I have traveled down to Oakland City which is just a few miles north of Evansville for over 20 years. I go down 465 to 67 to 57 and straight down. I of course am interested in the I69 extension. I believe if you take 67 down to 57 and connect there, pick 57 on down, it is much more of a straight shoot, it would save money. No only that you can use the passing lanes on 67. I've traveled this for over 20 years. I believe this would be the best and you would save money. Forget Bloomington and that area. Come straight down. Why this wasn't done 20 years ago, no 50 years ago when they started the interstate system. What were they thinking about. Fort Wayne, Indianapolis, to Evansville just makes sense.	3.4.3

0805-018 Anonymous.wpd

Subj: DEIS comments
Date: 11/7/02 7:33:43 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Andy
LastName = Kuhn
StreetAddress = 4641 E. Viola Dr.
Address =
City = Mooresville
State = IN
ZipCode = 46158
Email = andrew.kuhn@gm.com
Comments = Dear INDOT Representative:

As a citizen who would not be directly impacted in close proximity to any proposed alternatives, I would hope to offer the following brief comments that reflect more than a subjective "not in my backyard" approach. The opinion of this writer is that the I-70 / US-41 route is the best alternative for a I-69 extension from Indianapolis to Evansville.

Cost: It borders on silly to discuss more expensive options with the current fiscal shortfalls for the State of Indiana. The I-70 / US-41 route is nearly 50% less expensive than many of the "preferred" new-terrain routes listed in the DEIS study. Although the majority of the funding will likely be federal, over-budgeting the I-69 extension will erode maintenance funding for existing highway infrastructure. Federal highway funding is pretty much a "zero-sum" game.

Need: If one takes a look at an Indianapolis map, it is quite discernable that Indy already has generous interstate accessibility. Yet another spoke in the I-465 "wheel" is simply not warranted. Additionally, the vast majority of people who will gain any additional travel time savings will not be Hoosiers, they will be inter-state or international travelers. In fact, the local communities in close proximity to any new-terrain alternative will see a decrease in local access and through-ways.

Mann Road corridor: The Southwest corner of Indianapolis is the only one left without an interstate branch out perpendicular to the city. This affords Decatur township its more rural, diverse setting. This type of diversity is important to a city, and would rapidly be lost if the Mann Road corridor is implemented. Also, as someone who travels this corridor regularly, fog is a frequent occurrence in the low-lying areas of northern Morgan County, and could lead to tragic accidents like those seen in other states with dense fog on multi-lane interstate highways. 3.4.3

Lugar farm: Senator Lugar has already stated his strong opposition to the Mann Road corridor. If it is chosen in the December selection process, INDOT can also expect a ground swell of local, grass-roots opposition to its implementation.

Thanks for registering my opinion. The time afforded for publkic comment is greatly appreciated.

Andy Kuhn

1107-229 Kuhn, Andy.wpd

Town of Santa Claus

TOWN COUNCIL AND
OFFICE OF THE CLERK-TREASURER

P.O. BOX 92
SANTA CLAUS, INDIANA 47579
(812) 937-2551
FAX (812) 937-2630

October 28, 2002

Janice Osadczuk, Chief
INDOT Division of Environment, Planning, and Engineering
100 North Senate Avenue, Room N755
Indianapolis, Indiana 46204-2228

Re: Draft Environmental Impact Statement (Tier 1) for I-69 between Evansville and Indianapolis, Indiana. (FHWA-IN-EIS-02-01-D)

Dear Janice Osadczuk,

Per your request dated August 1, 2002, comments are submitted for the referenced project.

The Town of Santa Claus and Spencer County will benefit by extending I-69 directly between Evansville and Indianapolis. Comments in favor of a direct route include:

- Spencer County residents need an interstate highway to Indianapolis. Currently, interstate highway travel requires residents to drive I-64 to the Louisville, Kentucky vicinity in order to travel I-65 north to Indianapolis. The direct route for I-69 will save time and cost for those traveling from the Spencer County area to Indianapolis. 3.4.3
- The State of Indiana has committed to the construction of a new US 231 through Spencer County. This will link the Natcher Bridge to I-64. From I-64, traffic needs to proceed north and northeast to Indianapolis. This could be accomplished by executing the plan to extend US 231 north of I-64 to an I-69 direct route.
- From Spencer County, it would not be logical to drive 40 minutes west on I-64 to US highway 41 (proposed I-69 alternative) to continue travel to Indianapolis via Terre Haute.
- An I-69 direct route will benefit the Santa Claus economy by improving highway linkage to the Santa Claus Industrial Park and improving access to Holiday World and Splash'n Safari Theme Park, Lincoln State Park, and the Lincoln Boyhood National Memorial. 5.5

As Santa Claus Town Council President and a member of the board of directors of Spencer County Lincolnland Economic Development Corporation, I recommend that an I-69 direct route be constructed between Evansville and Indianapolis, Indiana. A direct route will better serve the residents and businesses of Santa Claus and Spencer County.

Respectfully submitted,

Michael A. Kamp
Town Council President

1028-035

The following comments are offered regarding the I-69 Evansville to Indianapolis Indiana, Tier 1 Draft Environmental Impact Statement (DEIS) & Section 4(f) Evaluation.

Environmental Impacts

Alternative 1 far exceeds all other alternatives in regards to minimal direct environmental impacts (*see* Table S-6). In fact, as the following table illustrates, the selection of a route other than Alternative 1 will result in tremendous additional losses of farmland, forest and wetlands:

Criteria	Minimum Additional Acres Lost	Maximum Additional Acres Lost
Farmland	2290	4460
Prime Farmland	950	4070
Forest	635	1340
Estimated Core Forest Habitat	85	440
Wetlands	50	165

5.20

For example, while Alternative 1 would result in a loss of as much as 1780 acres of farmland, the best other alternative would consume at least 4070 acres, or **at least 2290 acres more than Alternative 1**

While building new wetlands in other locations can mitigate wetlands losses, **these additional losses of farmland and forest cannot be replaced.** Clearly, this conflicts with one of INDOT's nine overall policies:

> "INDOT will establish and maintain a transportation system that is consistent with the state's commitment to protect the environment."

(*see* Section 2.2.2, Indiana Statewide Transportation Policies, page 2-6)

Indirect Impacts

Indirect impacts (effects) are defined by the EPA as follows:

> "Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." (40 CFR, Sec. 1508.8)

Just as Alternative 1 exceeds all other alternatives in minimizing direct impacts, so it does with Indirect impacts. The following table shows the additional acres affected by selecting an alternative other than Alternative 1:

Criteria	Minimum Additional Acres Affected	Maximum Additional Acres Affected
Farmland	40	400
Forest	10	330
Wetlands	See NOTE	30

(NOTE – Indirect wetlands impacts could potentially improve by as much as 20 acres.)

5.20

Limestone Deposits; Karst and Cave Regions

Section 5.29 (Irreversible and Irretrievable Commitment of Resources), page 5-229, states:

> "Limestone is another resource of concern. **Indiana produces about 60% of the limestone in the United States.** A number of the alternatives cross the Mitchell Karst Plain, which is known for its limestone deposits." (*emphasis added*)

Section 5.29 continues:

> "As long as the land above the deposits is used for a highway and surrounding development takes place, these deposits will no longer be available for use."

Note that Alternative 1 does not cross any limestone deposits; the "preferred" alternatives would cross 5 to 13 miles of this precious resource

[1].

Another problem in areas of limestone deposits is karst and cave regions. Section 5.29 states:

> "Karst and cave regions are a source of limestone, recreation and habitat. A karst is a hilly landscape of caves and sinkholes that develops on some dissolving limestone formations (Camp, 1999). Unlike wetlands replacement, the loss of karst and caves is non-replaceable. **Karst areas are sources of recharge for underground aquifers and play an important role in groundwater supplies for human consumption.** It is not only the overlaying roadways that will make these resources irretrievable, it is a host of secondary impacts that will follow from construction of the highway." (*emphasis added*)

Section 5.29 also discusses the concerns about pollution in karst and cave regions:

> "Secondary development issues are the construction of business and residential areas along the roadside. **Development in the vicinity of the road will cause greater runoff problems that could effect karst and cave areas.** Runoff would come from parking lots, roads, and other non-point discharges and cause water quality issues with the possible degradation of an irretrievable resource. Most groundwater in karst areas moves through openings in the rock, its flow is often faster, more concentrated and less predictable than groundwater movement in non-karst areas. It is difficult to determine the locations and directions of flow of all the groundwater conduits in an area, and **in the event of a spill, the effects could be rapid and unpredictable. Pollutants can travel many miles underground in an unknown direction, in a single day, in a relatively undiluted state, making containment, cleanup, and public protection virtually impossible** (Keith and Powell, 1997)." (*emphasis added*)

Economic Impact on Business

Section 5.5 (Economic Impacts) states that the selection of Alternative 1 would result in a negative economic impact on local business of $7.3 million (*see* Table 5.5-1), because, as the DEIS states on page 5-34:

> "US 41 would be rebuilt to Interstate standards under Alternative 1, thereby restricting traffic access and negatively impacting business sales in both the distant and adjacent scenarios. In this case, the increase in traffic along the existing US 41 corridor would not be of a magnitude

[1] There is an apparent discrepancy in the Tier 1 DEIS. Page 5-99 states: "Alternative 1, 3B, and 4C do not cross any areas of potential limestone deposits"; however, Table 5:14-1 (Description of Mineral Resources) indicates that Alternative 3B crosses 5-6 miles of limestone and Alternative 4C crosses 12-13 miles of limestone. This appears to be confirmed by the karst maps for these areas, found in Volume III (Environmental Atlas) of the Tier 1 DEIS.

> sufficient to offset access restrictions."

Section 5.5 further states on page 5-35 that:

> "As might be expected, businesses dependent on pass-by traffic on US 41 and SR 37 would be negatively impacted by alternatives that divert traffic away from these corridors. The analysis probably represents a worst-case condition since the methodology does not take into account such variables as customer loyalty or the composition of pass-by traffic. For example, a gas station that relies mostly on local customers may experience very little impact. Moreover, the construction of I-69 is likely to take place over many years with traffic volume changes happening very gradually. Most businesses tend to adapt to changes in market conditions. These kinds of adaptations are not reflected in this analysis. As a result, the actual impacts are likely to be somewhat lower than the forecasts reflected in this analysis."

Table 5.8-1 of Section 5.8.4 (Impacts on Major Corridors) on page 5-42 indicates that by constructing a route other than Alternative 1, **traffic along US 41 would decrease by 13% to 66%.** According to U.S. Census Bureau data (http://quickfacts.census.gov), the total land area of the 26 counties in the Study Area is 10,351 square miles. Page 5-34 of the DEIS states;

> "...the total estimated Study Area sales are about $11.3 billion dollars."

This averages out to about $1,092,000 per square mile[2]. For the 2-mile wide Study Band, the estimated annual sales dollars for Alternative 1 range from $336 million to $340 million. Therefore, assuming sales dollars lost in the Study Band are proportional to traffic level reductions, **the potential lost sales dollars along US 41 could range from $43 million to $190 million per year.** 5.5

Oddly, this significant sales loss impact was not considered in the economic analysis, and yet clearly, **these levels of decrease in traffic would result in a far greater negative economic impact on businesses along US 41 than the projected $7.3 million impact of Alternative 1**, which the DEIS admits is probably an inflated figure. It is also strange that the DEIS seems to disregard this huge negative impact by simply stating: "Most businesses tend to adapt to changes in market conditions".

It would seem that the DEIS assumes it is acceptable to divert as much as 66% of traffic (potential commerce) away from existing commercial areas in order to increase potential commerce in other areas. This would appear to run counter to Goal 3 of the Purpose and Needs section of the DEIS (page 2-5):

> **Goal 3:** To facilitate economic development and enhance economic growth opportunities domestically and internationally through efficient and flexible transportation with particular emphasis being given to economic growth in the Lower Mississippi Delta Region.

Construction Cost

On page 6-2, one of the advantages listed for Alternative 1 is:

- Lowest construction cost ($0.80-$1.04 billion) and operation and maintenance costs

In fact, according to figures in Table 6-1 (Summary of Key Performance Measures and Environmental Impacts), **construction costs for Alternatives 2C, 3B, 3C, 4B and 4C**, which are referred to as "preferred alternatives" by INDOT (*see* Table S-7), **are anywhere from $230 million to $1.01 billion** more than Alternative 1. It would have been advantageous to consider the benefits of using this $230 3.4.6

[2] This is probably a conservative figure, as sales dollars per mile would be higher in commercial areas than in rural areas.

million to $1.01 billion for other transportation projects in Indiana which could better meet the State's transportation goals; however, no such consideration was given in the DEIS. 3.4.6

Regional Accessibility

In Section 6.1 (Alternative Advantages and Disadvantages), page 6-3, the following is listed as a disadvantage to Alternative 1:

- Poorest improvements in regional accessibility (core goal)

While it is somewhat unclear which of the overall goals listed under Purpose and Need (Chapter 2, page 2-5) this relates to[3], presumably it is the following:

> Goal 2: To enhance the regional and local transportation systems by providing transportation capacity to meet current and future needs.

Presumably, the reason Alternative 1 is ranked so poorly in terms of regional accessibility is by virtue of its performance according to the following criteria listed in Table S-6, Purpose and Need Performance:

- Accessibility – Increase in # of People Within 1 Hr of Indy
- Accessibility – Increase in # of People Within 2 Hrs of Indy
- Accessibility – Increase in # of People Within 3 Hrs of Indy

3.4.3

However, while **enhanced regional access to Indianapolis** would certainly be desirable, **it is not one of the overall goals of this project[4], and, therefore, should not be listed under Purpose and Need Performance. It should be noted, however, that Alternative 1 does rank as an improvement in the following criteria:**

- **Accessibility – Increase in # of People Within ½ Hr of Major Urban Area**

Summary

Table S-6: Summary of Key Performance Measures and Environmental Impacts, provides a concise assessment of all alternatives. The following table contains those sections of Table S-6 that include Alternative 1 and INDOT's "preferred alternatives". Results highlighted in green indicate those alternatives that performed best within the criteria; those in red performed worst.

Alternatives 2C and 4C contain many of the worst results and none of the best. Alternatives 3B and 3C contain a mix of best and worst; however, both are also the most expensive routes and both require the largest number of residential locations (which are likely to be the most contentious of issues). Alternative 4B has few disadvantages; however, it also has few advantages. Alternative 1 has several disadvantages (although "Access to Indianapolis" is of questionable merit – refer to the comments regarding Regional Accessibility); nonetheless, Alternative 1 is the "greenest". In fact, it Alternative 1 **performs best in more criteria than all other "preferred" alternatives combined**, including cost, 6.2

[3] Page S-2 of the Summary to the DEIS describes the following as a "core goal": *"Improve personal accessibility for Southwest Indiana residents. (core goal)"*. However, in the February 2000, Statement of Purpose and Need, issued by the Corridor 18 Steering Committee, no such stated goal is listed (see Chapter 2-Purpose and Need, page 2-5, of the DEIS).

[4] Note that Goal 7 requires the following: "To directly connect the urban areas named by Congress (the 'named cities' of Indianapolis, Evansville, ...". Alternative 1 satisfies this requirement.

I-69: Evansville to Indianapolis Tier 1 Draft Environmental Impact Statement
Comments from The Greater Terre Haute Chamber of Commerce

farmland impacts, forest impacts, wetlands impacts and new right-of-way impacts. On this basis, Alternative 1 stands out as the clear choice. 6.2

Summary of Key Performance Measures and Environmental Impacts
(Alternative 1 and INDOT "Preferred" Alternatives Only)

Criteria	Alternative	Alternative 2	Alternative 3		Alternative 4	
		D	B	C	B	C
Alternatives						
Total Length (miles)	154-159	148-147	140-143	140-143	141-143	141-144
Total Impact Length (miles)	97-99	145-147	140-143	140-143	129-131	141-144
Total New Right-of-Way Impacted (acres)	1710-2210	5500-6200	5650-6440	5500-6060	5960-6060	6160-6760
Estimated Cost (billions $; to nearest 10 million	0.81-1.04	1.47-1.74	1.65-1.82	1.64-1.81	1.04-1.12	1.34-1.50
Potential Bridges Over Water	19	48-64	59	56-59	52-57	58-62
Potential Interchanges	23-25	29-32	22-27	28-31	20	25-29
Potential Grade Separations for Roads/Railroads	57-40	66-70	52-55	57-64	55-60	59-61
Purpose and Need Performance						
Indy-Evansville Connection - Freeflow Travel Time Savings (min.)	11	17	24	21	21	20
Indy-Evansville Connection - Typical Travel Time Savings (min.)	12	19	29	26	27	28
Accessibility - Increase in # of People Within 1 Hr of Indy	0	37000	48000	60000	5000	37000
Accessibility - Increase in # of People Within 2 Hrs of Indy	18000	42000	48000	40000	32000	42000
Accessibility-Increase in # of People Within 3 Hrs of Indy	59000	85000	216000	188000	112000	112000
Accessibility - Increase in # of People Within 1 Hr of Educ Inst	0	243000	288000	360000	56000	243000
Accessibility-Increase in # of People Within 1/2 Hr of Major Urban	9000	13000	12000	37000	0	9000
National I-69 - Daily Truck Hours Saved	2000	3600	4500	4300	3000	4000
Environmental Consequences						
Potential Relocations						
Homes	264-335	260-406	346-464	370-458	158-179	247-336
Businesses	70-131	96-113	42-66	61-76	11-12	35-56
Farmland (acres)	1370-1760	4300-5070	4290-4850	4070-4830	4970-5020	5170-5730
Prime Farmland (acres)	810-1330	3140-4100	2300-3760	2280-3730	3290-4130	3480-4660
Forest (acres)	110-170	840-935	1315-1450	1140-1275	835-1005	805-935
Estimated Core Forest Habitat (acres)	0	63	440	398	142	97
Wetlands (acres)	25-40	90-110	100-155	90-150	115-165	140-190
Estimated Wetland Mitigation (acres)	75-135	255-300	285-390	265-370	340-430	380-710
Section 4(f) Resources						
Historical Sites/Districts	0	0	0	0	0	0
Archeological Sites	0	0	0	0	0	0
Public Parks, Refuges, Recreation Areas	0	0	0	0	0	0
Potential Hazardous Material Sites	8-15	9-17	10-15	14-19	0-1	12-17
Total Streams Crossed	65-75	120-140	115-135	95-120	105-120	130-145
Perennial Streams	15-20	40-45	35-45	30-40	35-40	45-50
Intermittent Streams	50-55	80-95	80-90	65-80	70-80	85-95
Floodplains Crossed (acres)	370-470	1540-1850	800-1060	820-1080	1080-1120	1550-1810
Federal Threatened & Endangered Species	1	2	2	2	2	2
State Threatened & Endangered Species	12	15	13	14	9	15
Sinkhole Areas & Sinking Stream Basins (acres)	0	110	30	50	140	110
Indirect Impacts						
Farmland (acres)	420-480	735-826	720-800	710-790	530-595	715-800
Forest (acres)	70-140	215-285	310-380	325-400	150-205	220-290
Wetlands (acres)	0-25	5-35	10-25	10-30	5-30	5-30

1030-004 Henry, Rod.wpd

Subj: DEIS Comments
Date: 11/4/02 8:29:28 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Eddie Harris
Address = 4044 Hedgewood Ct
City = Newburgh
State = IN
ZIP = 47630
Email = Eddie_81@yahoo.com
Message = Please build the most direct interstate between Evansville and Indianapolis. Those of us with student athletes would appreciate a safer route between SW Indiana and Bloomington. 3.4.3

1104-005 Harris, Eddie.wpd

Subj: DEIS Comments
Date: 11/4/02 5:08:33 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Matt Rubacha
Address = 690 Barbour Avenue
City = Terre Haute
State = IN
ZIP = 47804
Email = matthew.rubacha@nextelpartners.com
Message = Hello. I am writing comments today based upon
the I-69 (Indy to Evansville) project. Having the opportunity to be involved in this project has allowed me the opportunity to express my views on the reason why this interstate should be built and where this interstate should be built.
In life, all of us must realize that life can be summarized in one word...Compromise. In relation to the I-69 project, compromise is one of the ways to bring everyone to the table and agree on a route. Alternative #1 option is not a compromise. It offers no time savings. Alternative #5 option is not a compromise. It destorys precious wetlands and precludes environmental issues. The compromise : Alternatives #2. Why is this alternative a compromise? First of all, US41 will be utilized from Vincennes/Knox County to Evansville. It may not be the fastest route, but it truly presents compromise. Secondly, US231 will be utilized leaving Bloomington and Terre Haute untouched, not distribing some of Indiana's largest and finest cities. Third, I-70 can be utilized to approximately the Cloverdale/US231 areas. It may not be the fastest route, but it truly presents compromise. 3.4.3
Finally, alternative #2 presents a low-cost build option with low-cost maintenance cost. The final view is something which very few Indiana residents have expressed during the length of this project. A low-cost
maintenance interstate will prevent the next generations from paying to maintain this interstate.
Alternative #2 - The common sense answer for a low-build interstate with a compromised solution (Indy to Cloverdale on I-70, US231, and Vicennes to Evansville on US41). Thank you very much for your time.

1104-021 Rubacha, Matt.wpd

Subj: DEIS comments
Date: 11/7/02 2:39:19 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = jenny
LastName = olmes-stevens
StreetAddress = 2312 woodbluff ct
Address =
City = bloomington
State = IN
ZipCode = 47401
Email = jolmesst@indiana.edu
Comments = I am against a new terrain highway. In particular I don't want I-69 to come near Bloomington, I think it will destroy the unique nature of this lovely college town and make it less desirable to college students. This is Bloomington's best asset, the wonderful youth and vitality, the student brings to the town and the small town atmosphere that they enjoy so much. Additionally, I don't like the Martinsville proposals, I37 is too congested when you get near Indy and it would discourage those of us in Bloomington from making the 1-2X/month trip up to Indy. It would also discourage those persons who prefer the country life and do the daily communtes to Indy. I firmly believe we must be responsible about the environment and protect it for the next generation, I have 3 young children, when we discuss this, they say, "Mom, there are already too many roads!". My 13 year old is worried about the wildlife that would be displaced. Here in Bloomington she could watch deer every morning on her bus ride until a subdivision went up near the wooded area, now she has seen only 1 deer in the last year. This is important to our children, they value the wildlife and the unspoiled countryside. Please don't build a new terrain highway in Indiana. Thank you. Jenny Stevens 3.4.3

1107-091 Olmes-Stevens, Jenny.wpd

Subj: DEIS comments
Date: 11/7/02 3:56:34 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Jeffrey
LastName = Moore
StreetAddress = 5605 Winthrop Court
Address =
City = Evansville
State = IN
ZipCode = 47715
Email = jkmoore@alumni.indiana.edu
Comments = Public comment in favor of a direct route of I-69 from Evansville past Bloomington to Indianapolis:

As a physician practicing in Evansville for twenty years, I feel compelled to comment on the safety of traveling from Evansville to Bloomington. By profession I am trained in areas of public safety. However, I can also add an additional depth of experience: I have traveled this route innumerable times over the past twenty years, in all kinds of weather, times of day, and all seasons of the year. I wonder how many times most who oppose a direct I-69 route to Indianapolis past Bloomington, have had to drive all the way between Evansville and Bloomington?

I am a native of southern Indiana and love its natural beauty. I grew up hiking and camping in the hills and woods of our state, and since I began driving have traveled many of our highways. I especially enjoy the beautiful scenery from Evansville to Bloomington: rolling hills, woods and farmland, rivers, small towns, old churches and graveyards. When I travel I-64 through Hoosier National Forest, I can relax and enjoy the drive, but I do not try to so on US 57/45. Even on a clear day, full concentration is needed by even the most experienced driver. The roads are narrow with sharp curves, minimal shoulders are followed by steep embankments, and blind hills and driveways all magnify existing hazards. Perhaps direct route opponents do not know that these roads are also traveled daily by hundreds of trucks, and are shared with school buses dropping off children, letter and newspaper carriers making their stops, many vehicles frequently pulling onto and off the highway, farm equipment, slow vehicles, and occasionally pedestrians and horses. If you travel this road as often as I have, you will see when the weather gets bad, this beautiful drive really gets ugly. Conditions that would hardly slow down interstate traffic can be extremely hazardous, as I have personally experienced several times. Rain, fog, and even the dark make it very difficult to see. On a recent drive this fall to Bloomington, to ride my bicycle in the Hilly Hundred, I encountered rain that made these roads very dangerous in the middle of the day. Another day I hydroplaned in unanticipated standing water. I have had to stay overnight unexpectedly in a small motel with three young children because sleet made these roads too dangerous to drive. I have spent six hours traveling behind trucks that could not get up and down the hills due to a little snow. I have seen many accidents, but fortunately have not been involved in any. However, on a clear day I watched a young man in front of me loose control of his car in a sharp curve and hit a tree: he died in my hands. 3.4.3

I am a careful and experienced driver, who knows these roads well, but I am uneasy and concerned everytime I make this trip. There are few guardrails or protective barriers, no extra lane or wide shoulders in an emergency, no limited access or many of the other safety features that make interstate driving less dangerous. Now compound these dangers by making the driver youthful, less experienced, and more prone to distractions. I have experienced the angst of a parent as his child makes this trip, and am most thankful my son always made it safely while attending school at IU. Driving on this route is more dangerous than any other roads I drive on in the State of Indiana, and we have hundreds of students driving this route continuously.

I am devoted to the State of Indiana and want to do all that can be done to preserve its natural beauty and environment. However, the greatest blessing God gave to Indiana is the people who live here. Protecting human life should be our greatest environmental concern, and my profession and I are committed to doing all we can to preserve it. Put economics and other arguments aside, because the primary reason I-69 should go directly from Evansville past Bloomington to Indianapolis is for the safety of the people who have to drive this route.

Jeffrey K. Moore MD
5605 Winthrop Court
Evansville, IN 47715

812/474-0100 (H)
812/426-9305 (W)

1107-128 Moore, Jeffrey.wpd

Anthony Mescher
1821 E Southdowns Dr
Bloomington, IN 47401

RECEIVED OCT 30 2002

October 24, 2002

Bryan Nicol, Commissioner
Indiana Dept. of Transportation
100 N. senate Ave.
Indianapolis, IN 46204-2249

Dear Mr. Nicol:

I am a resident of Bloomington and am writing with regard to the question of the most appropriate route of Interstate 69 in south Indiana. **In my opinion that route would be State Route 37 from Indy to Bedford,** followed by new or another existing road to the short Interstate currently extending north from Evansville.

My reasons are as follows:

- I think studies would show that SR 37 south of Indy already carries as much traffic as many Interstate highways.
- The current unlimited access and use of many stop lights on SR 37 make it an extremely dangerous road. Every year there are many accidents and several deaths of people trying to cross it or rear-ended at stop lights. 3.4.3
- It also represents the most direct route between Indy and Evansville. The route via Terre Haute is very indirect.
- Indiana University is a major facility in the state of Indiana and will benefit greatly for better access to the capitol.

I know the decision as to the route will be very difficult and very controversial no matter what the final choice is. However your input on the decision will be important. By this letter I wish to indicate that not everyone in Bloomington is against the road coming past our town. I drive to Indy frequently and wish SR 37 was an Interstate highway every time I do. I was not surprised that a recent poll showed a majority in favor of the route I advocate here, even though the opponents of this route have been very outspoken for years.

No route is perfect but using SR 37 will solve two problems at once: making a modern road between Bloomington and Indy, as well as provide part of the route for the Interstate link to Evansville.

Thank you for considering my input and good luck to you in your decision-making capacity!

Sincerely,

Tony Mescher

Anthony L. Mescher

1024-042

Michael Grovak
Bernardin, Lochmueller & Associates, Inc.
6200 Vogel Road
Evansville, Indiana 47715

Mr. Grovak,

The public hearings and the deadline for submission of comments on the findings of the DEIS do not give adequate time to review these documents or make public comment (hundreds of people were unable to comment at the public hearing in Bloomington). It has taken many years, seemingly unlimited dollars, and the commitment of a professionally staffed consulting firm to produce this document. To expect citizens working in their spare time using their own modest resources to be able to thoroughly analyze this information, well outside their areas of expertise, is unreasonable. What is a few more months to the permanency of concrete and steel? The deadline for written comments should be extended further and all pertinent information in your possession should be released to the interested parties to enable this analysis.

You stated at the public hearing in Bloomington that the first 18 months of the current study period was used to determine the purpose and need for this project. I had always though necessity was the mother of invention and not the other way around. Yet, this seems to be the case here. It seems that the purpose and need statement has been "invented" to justify this project. And as for the three "core goals" why is it important to improve the Evansville to Indianapolis connection? Who does it benefit? It seems to me a goal without any substance. And what does it have to do with the economic development of Southwestern Indiana as a whole, which proponents of this highway often push as its most outstanding benefit though it mysteriously does not appear as a "core" goal.

The second core goal, improving personal accessibility for Southwestern Indiana residents to certain urban areas such as Bloomington and Indianapolis, is antithetical to improving the economy of Southwestern Indiana as a whole. This action will suck people and money from poorer rural areas into well off urban areas, stressing conditions in both by depleting the rural areas of economic activity and increasing overcrowding and pollution in urban areas. The costs associated with these occurrences and their secondary social impacts have not been accounted for in this study. They must be included to present an accurate picture of the effects of this project on Southwestern Indiana as a whole. 3.4.3

The third core goal-supporting NAFTA interstate freight movement-is a restatement of the first core goal of improving the connection between Indianapolis and Evansville. It is essentially the same goal in different clothing of drawing a straight quick line between the same two points. To give this one action the weight of two "core goals" is inappropriate and skews the results of this study. This goal is also likely to have detrimental impacts to the economy of Southwestern Indiana which have not been considered, those being the flight of good jobs to lower labor costs in the South by making it less expensive for this area to ship its goods to us, thus eliminating local production jobs. Also, of the thousands of truck hours per day saved and the associated cost savings to business, which may or may not affect the numbers of people these businesses employ (if less time is required to ship goods from point A to point B, this would seem to offer less opportunity for truck drivers), how much will be accrued by Indiana Businesses? It seems to me that we will in large part be paving over a great deal of our precious landscape and spending precious tax dollars no matter which alternative is built to support the national I-69 project whose prime beneficiaries will be far distant lands and people. And won't the economic development associated with a NAFTA corridor only increase our dependence on unstable regions and therefore our military involvements to fuel it? Let's include these costs in the study as well. 2.3

Minimizing environmental impacts should be included as a core goal as should minimizing relocations of homes and business, including disruption to agricultural activities. The fact that they are not so weighted makes this study lopsided and shows the bias of its designers. The minimization of social and environmental disruptions and dislocations are of equal value to the other core goals and should be weighted accordingly to make a proper judgment in this matter.

The traffic model used in the study identifies benefits that will accrue to business because of reduced travel times, resource consumption, and safety, and that this will result in economic growth. The model however seems to ignore increased times, increased resource consumption, and more accidents that will occur as a result of cutting off existing routes crossing and along this limited access highway, and also does not consider the economic losses that will occur when some business are cut off through changes in traffic patterns. The economic benefits to the local economy purported in the study are therefore at the least overstated, and at worse completely negated by these losses.

It is not a display of wisdom that in this time of revenue shortfalls and rising state taxes that the preferred alternatives indicated by this study are the most expensive monetarily and add the most new road miles to a system of transportation infrastructure that we do not have the resources to maintain properly now. Adding miles and miles of new road will increase future maintenance costs and exact an even greater burden from future generations and increase the level of deterioration in our current system. And what is the economic cost to other corridors that are now being used for transportation between Indianapolis and Evansville, such as the I-70/US 41 alternative, when their lifeblood is sucked from them by a new ribbon of concrete? These costs must be included into the cost/benefit equation. It seems to me that we should be using our limited transportation funds on upgrading our existing transportation network and making it safer and more efficient before we even think about adding more miles to an already stressed system.

Who are the real beneficiaries of the goods of this project and where do they live? Do they reside in the so called economically stressed region of southwestern Indiana that is touted as the primary focus of the purported economic benefits? Some do, but the vast majority do not. They reside on either end of this region and it is they who have the most to gain monetarily and the least to lose. It is not they whose lives will be so insulted. It is not they who will have their homes and businesses destroyed and their land taken from them. It is not they who will be paying the other so far hidden costs of this project. I demand that these costs and other, non-highway, alternatives to the transportation needs of the citizens of Indiana be included in the DEIS.

All of these alternatives, except the no-build, is a violent crime committed against each individual that loses their home, their farm, their business, or has their surroundings irreparably damaged or destroyed. It is the sort of sacrifice that we force many to make unfairly for the dubious benefit of others. I therefore believe that considering and including the costs mentioned above that have yet to be accounted for in the DEIS will show that the no-build option is the best not only for the people of southwestern Indiana and Indiana as a whole, but for the entire country. The only other alternative even worth considering is the I-70 / US 41 alternative #1.

Thank you for your consideration of these comments.

Sincerely,

Leif Hagglund
823 W. 6th Street
Bloomington, IN 47404

P.S. Rail systems were referred to in the DEIS as a "non-transportation" alternative. I believe this to be an error. Railroads are a form of transportation.

The I-69 fiasco and reason number 18 why it should not be built:

Since INDOT seems hell-bent on building a new terrain highway no matter what the economic, resource, and human cost might be, I have undertaken a letter writing campaign to inform INDOT of their inherent ignorance of numerous points. I am writing this series of letters as a matter of formal public comment, and I fully expect INDOT to include this in their EIS and actually read and consider the points being made.

An eighteenth reason why a new terrain I-69 cannot be built is the fact that the time and distance savings of a new terrain route over the US 41 / I-70 route are minimal, and certainly not worth the added cost. The EIS itself states that the maximum savings over alternative one would be about 15 minutes and 13 miles, and this is not worth paying an extra billion dollars of taxpayer money for. Most new terrain alternatives would not even show this much of a travel time advantage. 3.4.3

The various proponents of a new terrain route (as well as INDOT) have been quite outspoken with regards to the amount of time and distance savings that a new terrain route would have over alternative one. When the numbers are finally put on paper, they are quite unimpressive as an argument for a direct route. A 15-minute maximum time savings for a trip from Evansville to Indianapolis is quite negligible.

The fact that this 15-minute maximum time savings is being used as a justification to waste 1.0 to 1.8 billion dollars of taxpayer money is almost unbelievable. I would expect any semi-fiscally responsible politician to see this huge waste of money and put an immediate stop to it. Fiscal responsibility is obviously a virtue of which INDOT is completely lacking.

If a new bridge project reduces a commute from a roundabout 45-minute 30-mile trip to a 15-minute 10-mile direct trip, this might be considered justifiable. The new terrain I-69 route is completely non-justifiable based upon time and mileage savings. A new terrain route does not show major savings of time or mileage, and cannot be designated as preferred based on that criterion.

A new terrain highway is UNACCETABLE in southwestern Indiana. The only two acceptable alternatives are to not build it at all (preferable), or to upgrade US 41 / I-70.

Wayne Werne
RR 1 Box 254
Ferdinand, IN 47532

Wayne Werne

1104-053

Subj: DEIS Comments
Date: 11/5/02 2:28:29 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Paula Hughes
Address = 6577 Old Stonehouse Dr
City = Newburgh
State = IN
ZIP = 47630
Email = a203683@aol.com
Message = Opponents of a direct, new-terrain, route for I69 state that the travel time savings are inconsequential. This is not true, and I hope the study will give full weight to the economic and environmental savings of a direct route.

We have only one chance to build this highway. Once a route is selected, it will exist for a lifetime, or several lifetimes! Travel time savings must be multiplied by the thousands of vehicles using the highway daily, by the expected life of the highway (50 - 100??) years.

Calculation of travel time savings should include personal and valuable commercial time. Show me any employer that would not want to improve employee productivity by 20 minutes (40 round trip) for employees traveling that route. Savings should also include fuel, tires, mileage depreciation, etc. Savings should also factor in the environmental impact of a 20 minute reduction in pollution generated, again multiplied by the thousands of vehicles daily, by the expected life of the highway. If we don't take steps to reduce pollution now, we will be forced to in the near future, at some additional future cost. Build this highway as an indirect route, then show me how we can easily achieve a 20 minute savings in driving time (multiplied by thousands of vehicles daily) when the Federal regulators demand that we reduce pollution?? 3.4.3

Depending on who's figures you use, the "extra" $600 million for a direct route must be viewed as a one-time expense, offset by a lifetime or several lifetimes of savings demonstrated above.

Please insure that these factors are included in the current study and given full priority.

By the way, if you are collecting votes, I am AGAINST the US 41/I70 alternative, and FOR the most favorable direct route.

1105-080 Hughes, Paula.wpd

Subj: DEIS Comments
Date: 11/6/02 4:47:28 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Edward J Spanier
Address = 206 East John St.
City = Alexandria
State = IN
ZIP = 46001-2026
Email = phyllisanded@iquest.net
Message = I would argue against any alternative that carries I-69 together with I-70 for any significant distance.

My primary concerns are safety and congestion. I have driven I-70 from the east coast since 1972. We regularly drive I-70 to I-57 south. It is inconceivable to me that loading I-70 with additional traffic related to I-69 is a prudent strategy for the longer term. I fully expect the traffic on I-70 to continue to increase, particularly truck traffic. Even if two additional lanes are added to I-70 in each direction this would seem to be a less desirable alternative than any of the more direct options. I would also be interested in the cost to increase the capacity of I-70 just to handle the potential additonal traffic related to I-69 compared to the other I-69 options. 3.4.3

Thank you for allowing me to comment.

1106-061 Spanier, Edward.wpd

Subj: DEIS Comments
Date: 11/1/02 5:27:03 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = James R. Pate Jr.
Address = 7131 S. Burch Road
City = Bloomington
State = IN
ZIP = 47403
Email = jbobp8@aol.com
Message = James R. Pate Jr.
7131 South Burch Road
Bloomington, IN 47403

I am writing to express my views on the extension of I-69 through Southern Indiana, and to express my support for selecting alternative four as the most logical route for the extension of this interstate road.

First, let me state that I am not opposed to the construction of a new super highway through this part of our State. We have a daughter and her family living in Evansville and a faster and safer road between Bloomington and Evansville will be great for us.

I am, however, concerned over the direction this proposed highway will ultimately take. Many citizens are opposed to any new terrain route for this project and desire the road to utilize current interstate routes; others desire for it to pass through Bloomington and utilize a new terrain route that would pass close to Crane. While both of these opposing groups put forth strong – if not always logical - reasoning for their views, I believe the best solution lies somewhere between these two extremes – alternative number four.

- Alternative four will utilize existing roads for much of the way resulting in less new terrain, and the taking of private property by the government without the consent of the rightful owner.

- It will cost less than some of the other alternatives, which will leave much needed funds for repair of current roadways throughout the State.

- While not passing directly through Bloomington it will pass within a reasonable distance. What the citizens of the Bloomington area need is good access to an interstate highway. What they do not need is to be cut in half by one. 3.4.3

- It will pass in close proximity to the Crane Naval Base providing that facility with good access to more rapid transportation capabilities.

- It will require less new terrain than most other alternatives. Fewer farmers and landowners will lose their private property through eminent domain proceedings.

- It will boost the economies of Owen, Green, and other southwestern counties. Monroe County with the lowest unemployment rate in the state has much less of an economic need than does Owen and Green counties. The latest figures indicate the unemployment rate in Green County is 6.3%. Add to this an impending loss of over 300 additional jobs and you come up with a county in need of economic assistance. 3.4.4

- Being the most direct route, it will require the least amount of travel time between Indianapolis and Evansville.

- It will reduce the traffic load on highway 37 between Bloomington and Indianapolis.

- It will result in safer highways for the citizens traveling Indiana highways. Reducing the traffic load on highway 37, and eliminating a very dangerous section of highway 67 near Martinsville the number of traffic accidents will decrease and many lives will be saved.

Although the alternative four route would not completely satisfy everyone concerned with the project it will be a win–win situation for all citizens of Indiana. I trust you will take this information into consideration when making your decision on the route for the extension on I-69 through Southern Indiana.

Respectfully submitted,
James R. Pate Jr.

1101-010 Pate, James.wpd

P.O. Box 2262
Oxford, Mississippi 38655-7262
Internet mail: *chris@lordsutch.com*

26 October 2002

Mike Grovak
Project Manager
Bernardin, Lochmueller and Associates, Inc.
6200 Vogel Rd
Evansville IN 47715-4006

Dear Mr. Grovak,

I am writing today to express my support for the construction of Interstate 69 between Indianapolis and Evansville, and specifically a route that provides reasonable and direct access to the cities of Bloomington, Martinsville and Washington and the Crane Naval Surface Warfare Center in southwestern Indiana. While I do not recommend a specific route south of Bloomington, I do believe the S.R. 37 corridor north of Bloomington requires relief, either through the construction of a parallel freeway facility for I-69 or an upgrade of S.R. 37 to Interstate highway standards.

Some opponents of highway construction have argued that a direct route is a waste of money and a threat to the natural environment. While it is true that upgrading U.S. 41 to Interstate highway standards would be less costly than a "new terrain" route, it would not be a *cost-effective* use of resources. The marginal benefits derived from improving U.S. 41 to Interstate highway standards are minimal and could easily be achieved at much less cost to Indiana's taxpayers by completing the S.R. 641 Terre Haute southeast bypass, which is already in the state's transportation plan, and raising Indiana's rural expressway speed limit. And while the effects on the natural environment of highway construction should not be ignored, the reality is that a U.S. 41 upgrade would impose much greater human costs than a "new terrain" route and would disproportionately affect the more economically productive farmland in the Wabash Valley.

Furthermore, improving U.S. 41 does nothing to improve access between Evansville and Bloomington. While some advocates of a U.S. 41 routing of I-69 have suggested they would eventually support four-lane upgrades of S.R. 57 and other routes, or a direct non-Interstate link, the arguments made by environmentalists against a "new terrain" I-69 would apply equally to any other transportation improvement in the region, even a direct two-lane highway from Washington to Bloomington, much less a four-lane highway. Realistically, Congress and the state legislature are unlikely to authorize spending on a direct Bloomington-Evansville corridor in addition to a U.S. 41 upgrade; even if they did, the costs of constructing both I-69 along U.S. 41 and this new, shorter route would likely be similar to the costs associated with a "new terrain" route for I-69. 3.4.3

Nor does improving U.S. 41 help access between Bloomington and Indianapolis. While some Bloomington officials may believe that increasing the congestion of the S.R. 37 corridor will protect their community from "sprawl" induced by commuters headed to the north, in reality Bloomington is already sprawling outside its city limits and into surrounding communities where those officials hold little sway. I realize that taking on the role of an unconstructed 1960s radical has great cachet for many Bloomington's city council members, but pretending that their community's problems managing growth have anything to do with the I-69 project is dangerously naive. Bloomington has already become a community of big-box retailers and Starbucks without I-69 (at least if you don't live in the state of denial resulting from hanging out in the town square), so it is quite unrealistic to claim that not solving the community's current and visible transportation problems will keep "sprawl" away from Bloomington when it is already there.

Any transportation project of the magnitude of I-69 will result in disruptions to the human and natural environment. Those disruptions are unavoidable, no matter how much right-of-way is taken or which route is selected. It is unfortunate that some people will have lose property (even if they are compensated for it), and the people who live near the selected route will have to deal with the hassles of construction. That disruption can due to the state wasting a billion dollars on improving a highway that does not need any improvements, or it can be due to constructing the modern transportation facility that provides most of the major communities of southwestern Indiana with direct access to each other and Indianapolis. Ultimately I trust that the State of Indiana will make the right decision.

Sincerely,

Chris Lawrence

1030-023

INDOT 2

Governor's Internet Mail

From: Doug Springer [d.springer@gte.net]
Sent: Sunday, August 25, 2002 10:05 AM
To: fobannon@state.in.us
Subject: I-69

In this time of fiscal constraints, I cannot begin to fathom the reason the state is even considering building on anything other than I-70/US 41. The framework is in place to build the 641 bypass from the airport exit on I-70 to US 41. Is this being taken into account? I am sure this will reduce the drive time from Indy to Evansville beyond what you have estimate. This would greatly inconvenience me during the construction phase, but would benefit everyone in the long run. I live west of US 41 off of Dallas Drive and commute to the prison at Carlisle to work daily. Do the right thing. 3.4.3

Doug Springer
1450 W. Sitting Bull Dr.
Terre Haute, In. 47802-9088

0825-032

Subj: DEIS comments
Date: 11/7/02 4:16:02 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Michael
LastName = Halbrook
StreetAddress = RR6 Box 303
Address =
City = Bloomfield
State = IN
ZipCode = 47424
Email = halbrook@indiana.edu
Comments = As a property owner in Greene County, I want to go on record as being against any "new terrain routes" for I69. In my 30 years of experience living and working throughout the U.S. (Midwest, West coast, East coast) and having directly driven in and visited 49 states, Interstate roadways provide a critical link for both commerce and civilian transportation. My observations from driving these tens of thousands of miles on Interstates are that very few small to mid-size communities have reaped any large scale, economic business-related growth. That is not to say some communities haven't benefited, but this tends to be the exception rather than the rule. Benefits for smaller communities from Interstate roadways are generally much smaller and in the form of closer access to an Interstate. Period. Interstates benefit the commercial traffic between already established commercial centers/cities. The trade-off for a new-terrain I69 in So. Indiana is rural decay - loss of farmland, loss of woodlands, noise pollution from the traffic, and visual pollution via billboards. Additionally, the secondary state highways like SR 54 and SR 45 will carry an additional traffic load to and from I69. These smaller state roads are already heavily burdened with traffic and not built for an increased traffic load. Safety on these roads is an issue. 3.4.4

Whether you buy into any of these arguments or not depends mostly where one lives. I grew up in Indiana and left after college. 30 years later I moved back to Indiana, one of the main reasons being quality of life. I would have not purchased property in Greene County knowing that a new-terrain I69 would be close by. Currently I am looking into starting up a business in Greene Co., this decision is not driven by having I69 nearby, and I69 has absolutely no bearing on the business plan. I suggest choosing a more suitable route, like Route 41 if you are intent on keeping the I69 extension in Indiana. I'll leave you with an I69 haiku:

build it and will come
billboards, noise, rural decay
quality progress?

1107-136 Halbrook, Michael.wpd

The I-69 fiasco and reason number 14 why it should not be built:

Since INDOT seems hell-bent on building a new terrain highway no matter what the economic, resource, and human cost might be, I have undertaken a letter writing campaign to inform INDOT of their inherent ignorance of numerous points. I am writing this series of letters as a matter of formal public comment, and I fully expect INDOT to include this in their EIS and actually read and consider the points being made.

A fourteenth reason why a new terrain I-69 cannot be built is the fact that INDOT has proven its predisposed bias toward building a new terrain route by harping on the economic advantages an interstate would bring to affected counties, but selectively ignoring any advantage that would be gleaned by communities along the US 41 route. If INDOT truly believes that an interstate highway will bring economic salvation to affected counties (which is a lie to begin with), then they should at least to make the attempt to level the playing field by giving that same advantage to affected counties along US 41 if alternative one upgraded that route to interstate standards. 3.4.4

Indeed, there would be more evidence to support that argument along US 41 since communities already exist along that route along with businesses such as Toyota in Gibson County. Certainly a bigger advantage could be proven to exist for increasing the transportation utility for Toyota that already transports products in and out on US 41. More so than a contrived advantage for towns close to a new terrain route that DO NOT want this new road which do not have existing large businesses such as Toyota already there. To assume that an army of Toyota's or GE's or other large corporations will immediately flock to rural southwestern Indiana just to get the chance to build along a new interstate is quite laughable. To further predispose bias toward a new terrain route with the hopes that this magical economic salvation will automatically follow suit is in violation of what the process of doing a public-input fed environmental impact study is supposed to be about.

If INDOT is using the assumption that towns along an interstate route will glean economic advantage, then this same advantage has to be given to Princeton, Vincennes, Sullivan, and Terre Haute on US 41, instead of only to Petersburg, Washington, Bloomfield, and Bloomington along a new terrain route. Additionally, if a new terrain route were chosen, it would most certainly siphon off traffic from US 41, which, in INDOT's judgment criteria, would further economically disadvantage the US 41 corridor. Consequently, *if* INDOT continues to stand on the point that an interstate route equates to economic salvation and the lack thereof equates to economic advantage and destitute poverty, then the advantages of using US 41 as the route NEED to be considered as well as the disadvantages of not using US 41.

A new terrain highway is UNACCETABLE in southwestern Indiana. The only two acceptable alternatives are to not build it at all (preferable), or to upgrade US 41 / I-70.

Wayne Werne
RR 1 Box 254
Ferdinand, IN 47532

Wayne Werne

1022-013

Subj: DEIS Comments
Date: 8/21/02 10:30:50 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = John Reiplinger
Address = 1401 Greenfield Rd.
City = Evansville
State = IN
ZIP = 47715
Email = skipperondeck@aol.com
Message = In short, I favor a direct route between Evansville and Indianapolis. For the past three years, I traveled to Indy from Evansville 46 weeks out of 52, in the performance of my work. Traveling on Hwy 41 and I-70, I watched the Terre Haute sprawl move south and, while I grew to hate the traffic and stoplights along 41, several Terre Haute businesses have invested millions of dollars to capitalize on the free enterprize system. Upgrading 41 to limited access would put many of those businesses out of business. When I first moved to Indiana 27 years ago, the first thing I realized was the lack of political influence southwest Indiana had with Indianapolis. Our corner of the world serves a 60-miles radius retail trading area and it would be nice to expose this to the rest of the Hoosier state. Finally, one of the most scenic drives in the midwest is the I-64 route between Evansville and Louisville. The new I-69 proceding N.E. from Evansville through the hills of southern Indiana to Indianapolis would certainly equal that of I-64 and eventually draw passenger traffic with money to spend with new business development along this new roadway. 3.4.4
We in Evansville are rebuilding the "Lloyd Expressway" across town for the third time since its inception. Let's not make the same mistake by turning hwy 41 into something for which it was not designed. Thank you.
John Reiplinger

0821-002 Replinger, John.wpd

Date : Aug 11, 2002 19:30 GMT
To : Governor O'Bannon, Fax 13172323443
From : commonsense@commonsensei-69.org
Subject: Interstate 69 highway

Below is the result of your feedback form. It was submitted by (commonsense@commonsensei-69.org) on Sunday, August 11, 2002 at 13:29:45

My Comments:
Governor Frank O'Bannon
Statehouse
Indianapolis, IN 46204

Dear Governor O'Bannon:

Please choose the common-sense Interstate 70/US 41 route for the new Interstate 69 highway.Who are the nameless bueracrats who have eliminated I-70/US 41 from consideration? Their names, nor their expertise, nor their evidence for supporting their late July decision have been publised.

It's not worth spending hundreds of millions of additional tax dollars to build a new-terrain highway that saves just 10 minutes on the drive from Indianapolis to Evansville. The new permanent jobs created will be $7 per hour jobs at restaurants; gas stations, hotels, etc. Local taxes for present taxpayers will increase to provide services such as schools, police & fire, etc for these low income workers' families because these low income workers will not provide sufficient tax revenue for their needs. And lastly, many businesses along the route will not only receive favorable zoning that will increase local taxes but also tax abatement, tax increment financing (TIF) and other corporate welfare that will add to the increased local taxes. 3.4.4

In addition to saving our tax money, I-70/US 41 will preserve thousands of acres of Indiana's remaining farmland and forests, avoid harming our communities and leave money available for needed transportation projects throughout Indiana.

Thank you for considering my opinion.

Sincerely,

Brent Pittman
6593 Donnelly Drive
Brownsburg, Indiana 46112

My Name: Brent Pittman

My E-Mail Address: mbppbm@yahoo.com

submit: Send Fax

0811-004

Subj: DEIS Comments
Date: 8/13/02 8:43:51 PM EST
From: ezform@networkwos.com
To: mgrovak@aol.com

Name = Larry A. Wheelock
Address = 7480 State Road 42
City = Terre Haute
State = IN
ZIP = 47803
Email = lawheelock@earthlink.net
Message = I sent a letter to the Terre Haute Tribune last Thursday, August 8, 2002. They published it, in part, on August 10, 2002. Here is the letter as I sent it via e-mail in its entirity. Please accept it as my official comments filed.
Larry Wheelock

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ubject:
My answer to sound-off question: "Is INDOT taking the proper approach in its process of selecting a route for a new interstate through southern Indiana?"
Date:
Thu, 08 Aug 2002 01:09:19 -0500
From:
Larry Wheelock <lawheelock@earthlink.net>
To:
max.jones@tribstar.com

A qualified YES!

A project such as the I-69 project must be looked at from as to what best serves the Nation and hence Indiana for the long term. By long term, we must consider the effects of location over the next at least 40 years.
For the long term, common sense says that the route should be the most direct route possible from Indianapolis to Evansville. The most direct route would generally follow Indiana 67 southwest from Indianapolis and then Indiana 37 to the juncture of I-64 and the existing Evansville bypass. In my scenario, I-69 should not be routed to Bloomington along Indiana 37 any more than it should be routed via already saturated I-70 and US-41.
The argument that most in Terre Haute present is short sighted and selfish. Terre Haute will not, in the long run be hurt by a direct I-69, in fact, in the long run it will be helped because what helps Indiana will help Terre Haute. 3.4.4
Lets talk about the environmental issue. Lets talk about energy conservation. Lets talk about human time wasted and productivity lost. The most direct route would be at least 20 to 30 miles closer between Evansville and Indianapolis. This means that each vehicle must drive 20 or 30 miles extra. It means that each vehicle occupant is wasting 20 to 30 minutes of time. It means each vehicle is using from 1 to 6 or 7 gallons more fuel to get from Indianapolis to Evansville. In the early years I-69 will carry thousands of vehicles each and every day. Over a 40 year period this becomes a very large number. 5.27
Lets, for the sake of argument, say that in a 24 hour period that an average of 180 vehicles per hour traverse this route. (That is only 3 per minute.) If there is no increase in traffic over the next 40 years, which we know is unrealistically low, there will be 24 X 180 X 365 X 40 = 63,072,000 vehicles making the trip. (I'm sure an extremely low estimate) Probably one third of these will be semi trucks. Now, lets say that the route through Terre Haute would require 15 minutes more time and be 20 miles further. (More realistically, it would be 20 to 30 minutes.) If 2/3 are cars with an average of 30 mpg and an average of 1.5 people in every car, we would travel 20 X 2/3 X 63,072,000 = 840,960,000 extra miles and at 30 miles per gallon that equals 28,032,000 (that's 28 million 32 thousand gallons of wasted gasoline using up our energy supply and polluting our environment, for nothing. At an average of 1.5 persons per car wasting 15 minutes (one quarter of an hour), the total wasted man hours is 2/3(cars) X 63,072,000 (total vehicles) X 1.5 (persons per car) X .25 (hours per vehicle) = 15,768,000 hrs. That is 15 million 768 thousand wasted hours. Now if one third is semi trucks the wasted time by truckers is 1/3 X 63,072,000 X 1 X .25 = 5,256,000 driver hours. As for fuel, if a semi gets an average of 5 miles per gallon (probably really less) and since 1/3 of the 63,072,000 vehicles (trucks) travel 20 extra miles at 5 miles per gallon we save 1/3 X 63,072,000 X 20 = 420,480,000 extra miles traveled at 5 mpg = 84,096,000 that is 84 million 96 thousand wasted gallons of diesel fuel!

In summary, if I-69 was to use the route through I-70 and US 41, over a 40 year period,
21 million 24
thousand man hours would be wasted
112 million 128
thousand gallons of gasoline and diesel fuel would be wasted!
The wasted energy resources and the negative environmental impact of burning fuel unnecessarily plus the wasted human time is obvious.
I believe that these are extremely underestimated figure. But, even these are huge and easily justify making I-69 go directly from Indianapolis to Evansville.
I can think of many more reasonable justifications for a direct route, but any one with an ounce of common sense can think of them too.

Larry Wheelock
7480 State Road 42
Terre Haute, Indiana
877-1730

0813-002 Wheelock, Larry.wpd

Subj: DEIS comments
Date: 11/7/02 10:54:53 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Robert
LastName = Bullard
StreetAddress = 3752 Bainbridge Dr.
Address =
City = Bloomington
State = IN
ZipCode = 47401
Email = bnsbullard@cs.com
Comments = I have lived in Bloomington for over the last 13 years and co-own a buisness now operating in Bloomington. I would like to see the final preferred route come through Bloomington for several reasons. I believe that growth associated with the initial construction and further development will aid our business and others in the community. Our business is associated with transportation,

I am originally from Posey County and I still have family that lives there. I make frequent trips to Vandenburgh and Posey County. It takes me at least 3 hours to get to Mt. Vernon from the south side of Bloomington. I believe that is excessive considering I can get to Lafayette from Bloomington in approximately 2 hours. I know the areas immediately encompassing the Evansville area will also greatly benefit from the growth potential the new interstate would provide. Just expanding SR 62 to a four lane divided highway from Mt. Vernon to Evansville has helped Posey County attract some industry. There are only two designated ports in the State of Indiana and one of them is approximately 20 miles west of Evanville. The Southwind Port in Mt. Vernon has rail, barge and road access. I believe locating another interstate near the facility will further bolster the states ability to move products and attract manufacturing. 3.4.4

In regard to safety, I know from experience that portions of US 50 from Bedford to Washington have many hazords. This route is heavily traveled with a large percentage of semi-trucks. There are very few climbing lanes for these trucks and not many opportunities to negotiate a safe pass around the much slower trucks. There are many obstacles such as rock outcropings and trees inside the clearzone that create potential serious accidents. Creating a four lane divide highway would allow for safer movement of large trucks and reduce the truck traffic count on US 50. The connection to the already four lane section of US 50 at Washington would create a major near mid east/west route between I 70 and I 64. An eventual expansion of a four lane divided US 50 east to US 231 seem prudent for the further development Knox, Daviess & Martin counties. This area has many local resources such as coal, gypsum, limestone, timber, agriculture goods, oil and gas. We need to provide an avenue of transportation that will increase their competiveness to deliver their goods outside the region and therefore assist in more export opportunities.

I believe the new terrian route will help the entire southwest corner of the state far more than any possible evironmental impact. We must move forward or be left behind.

Thank you for providing the opportunity to comment on the proposed project.

Robert Bullard

1107-317 Bullard, Robert.wpd

Subj: DEIS comments
Date: 11/7/02 2:48:42 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Pat
LastName = Connor
StreetAddress = 808 Brighton Crest
Address =
City = Bloomington
State = IN
ZipCode = 47401
Email = connorp@Indiana.edu
Comments = Do not let the Stop I-69 folks win. A route that provides better access to Indiana University for recruitment and research is imperative. Also it will lift Bloomington which has lost many manufacturing jobs and has a workforce that could benefit from new business starts that I-69 would provide. Equally important is that this route through Greene, Davies, and counties to the south toward Evansville will benefit those counties that also have been hard hit by loss of jobs. My experience from other states is that this interstate will improve the lives of those communities connected to or even close to the interstate and will not negatively impact lives or the enviornment. (I-43 in Wisconsin or I-39 corridor from Bloomington, IL to Wausau, WI) 3.4.4

1107-098 Connor, Pat.wpd

Subj: DEIS comments
Date: 11/7/02 1:56:58 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = james
LastName = wells
StreetAddress = 837 Oakwood Dr.
Address =
City = Greenwood
State = IN
ZipCode = 46142-2053
Email = wells.j.c@att.net
Comments = Please send I-69 down in-67 to i57 then to Evansville. The selfishness of Terre Haute for a business venture will do nothing for the people who will stand to gain from new industry along I-69. Those people have been left out since Indiana was formed. All of the power and water is already there. Let's take advantage of it and give those people a break. Make Southern Indiana industrial! 3.4.4

Thank You,

1107-062 Wells, James.wpd

Subj: New I-69 Study Form Feedback
Date: 11/7/02 2:37:57 PM EST
From: ibragincowboy@aol.com (Joshua Pillers)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Joshua Pillers
704 W. Ladd Ave.
Bloomington, IN 47403

Message:
To whom it may concern,
I would like to offer my comments on the proposed routes of I69.
First of all, the unemployment rate for south-central Indiana has been rising and the prospects of attracting new corporations are not good. Why would any large company consider an area so far off of the "beaten path." Semis cannot navigate the roads they currently travel and it is dangerous to the everyday motorist as well. If nothing is done to dramatically improve south-central Indiana's job outlook, entire towns are going to disappear. 3.4.4

Similarly, NSWC-Crane employees live in and support many towns in a one-hour radius of its borders. With the base closure threat staring Crane in the face, it is important to provide easier access in order to insure its survivability. I am originally from Southern Illinois and I know many bright engineers that were discouraged by the lack of highways leading to and from it. Also the heavy traffic on Hwy 45, Hwy 37, and Hwy 50 around Loogootee will be mitigated.

As for Alt 1 and 2, they do not make sense in my eyes. Making Hwy 41 an interstate will do essentially nothing. Hwy 41 is already an attractive location for many prospective industries. Secondly, the route is not a straight route to Indianapolis from Evansville. The route does nothing for state's economy.

I beleive that a route, either 3,4,or,5, makes the most sense for Indiana. It will be a "shot in the arm" for the state's economy and will lead to more jobs for a struggling part of the state. It will also bolster the argument to keep Crane running for years to come.

Thank you for listening to our voices. Please keep these words in mind when making the decision: Routes 1 and 2 would only satisfy the environmentalists and does not make sense for this state. Use this money wisely.. You can help more people with routes 3,4,or 5.

1107-090 Pillers, Joshua.wpd

Subj: DEIS Comments
Date: 11/7/02 12:48:51 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Tom Tucker
Address = PO Box 430
City = Washington
State = IN
ZIP = 47501
Email = chamber@dmrtc.net
Message = Efficient and sensible transportation solutions are crucial to our economic success. This reality makes the completion of I69 from the Canadian Border in Michigan to the Mexican Border in Texas vitally important in a positive economic impacts that could reflect throughout the entire country.
Modern and efficient highways attract business and provide better access to employment. The southwest portion of Indiana does not have the highway system to attract industry and provide employment.
We feel that alternative 3 addresses the core goals in determining the preferred route. It addresses travel time between Indianapolis and Evansville, improvement in personal accessibility, improvements of interstate and international movement of freight, improvement for long term economic growth, improvement in the safety and the potential to save lives. An Indiana map shows the existing highway and interstate routes. Void on the map is a direct route between Indianapois and Evansville. The high population and high individual incomes are in the areas with a modern, efficient, sensible and safe highway system. Also very vital to soutwest Indiana is Crane Naval Warfare Center. We believe if Crane had access to a major interstate, several industrial parks would adready be in place outside it's gates. Crane generates over $3 million dollars in state and local tax revenues. The I69 route could be a major factor in the next round of BRAC. Crane is very vital not only to southwest Indiana but to our country. In conclusion we feel "New Terrian Route" #3 would best address the core goals in your selection process. 3.4.4

1107-018 Tucker, Tom.wpd

John L. Smith
RR3 Box 486
Solsberry, IN 47459

November 4, 2002

Public Comment File
Michael Grovak, Project Manager
Bernardin, Locmueller & Associates
6200 Vogel Road
Evansville, IN 47715

Re: The errors of the DEIS study:

I am for no build. I could compromise US 41 / I-70, because Some of these losses will be true to a lesser extent if the highway is built on existing four lane US 41 & I 70, but I believe the facts show "no build " to be justified.

Loss of Farm Land:
Loss of productive farm land is in error of a factor of perhaps 2 times more loss than estimated because of the following:
Frontage road losses not calculated by the study. (60% of existing roads crossed will be closed.) Frontage and access roads not calculated will require the paving over of topsoil that blew from Kansas in the dust storm years. We should be good stewards of the land that is a gift to Indiana. With an ever growing population keeping the earth able to produce more and more food is of obvious importance. The price paid for food will rise as the demand increases and the available land decreases. 5.20

"Point rows!" A very large percentage of the farm land that is crossed by the new-terrain routes is in a generally north/ east direction. Current roads run North/South and East /West. This means that farmers who are now farming squares, are left with two triangles with what farmers call "point rows". It refers to the fact that you can not turn a tractor on rows that run out at different lengths as in triangles rather than squares. Many farmers in Gibson and Daviess counties are left with field after field with this situation. This renders their operation not viable given the loss of productivity and transportation times and costs to access remote fields that are currently continuous squares rather than isolated triangles. 5.20

Recognition of farming as the huge business of production of food is seemingly missed. Food production is one of the last USA manufacturing strong holds, yet every environmental concern of the Draft EIS is addressed by taking more farm land. Some routes will mitigate up to 1000 acres of lost forests with something. Will this be farm land? What ratio will the forests be replaced? Has that been estimated into the loss in the amount of farm land, or is the 4000 acres lost on some routes before more land is taken to replace lost wetlands and lost forests? The total loss of farm land needs to be accurately calculated. 7.1

Almost every consumer item is made in Taiwan or China now. If you don't pay attention to this fact, then go to Walmart and look at every item. You will see the fact that nothing is made almost anywhere accept China and Taiwan now. The exception? Food production and preparation is manufacturing in the USA now. This needs to be protected and made more efficient. Farm soil must not convert to just any use that can prove more valuable in dollars for the short term. By the time that food soil has reached the equilibrium with other land uses, only the rich will be able to afford food. Joe Kernan has made this point. If he does not come to the rescue of farms soon, his legacy will be that of a liar politician who sold out the movement of his own making. The protection of farm land, this is something that he should be proud of and stand up for. If he does not, then he is worse than one who never made the point.

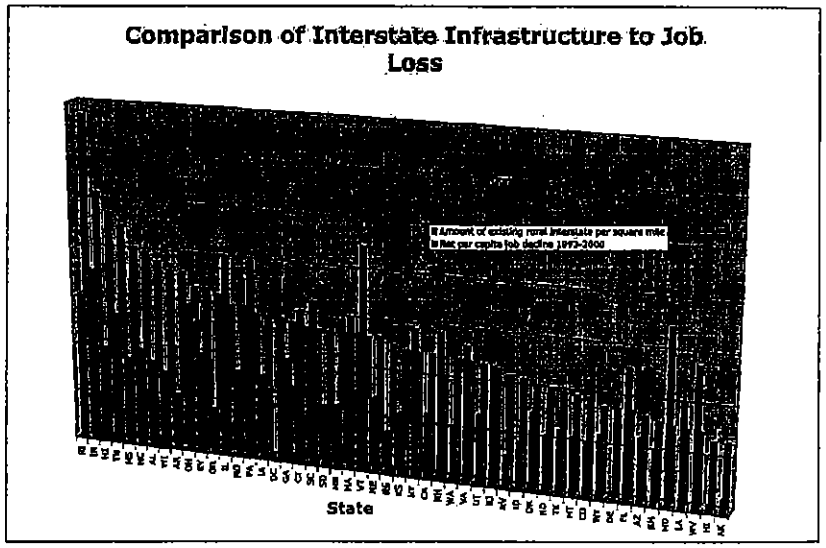
The fact of the Amish not using cars and being asked to give of their community for this limited access highway is of particular concern. It is plain unfair. Their lifestyle is based on a healthy community, undivided. They require little in infrastructure costs from other taxpayers. Their lands should not be

invaded for a infrastructure item that has no possible use to them.

This Highway is not a good way of producing Jobs:

INDOT'S record for job creation is not even poor, it is a very strong negative. According to DOT records, Indiana is #4 in interstate road density. It was #1 in the country in Job losses in 2001 and #2 in the nation over the past 7 years. Please see this Graph from http://www.assmotax.org/I69/InterstatevJobloss.php

One of the persistent themes surrounding the I-69 issue is that of economic stability that the highway will provide. Using data supplied by the Economic Policy Institute and the Federal Highway Administration we plotted the level of NAFTA-related job loss vs. existing rural interstate density per state. As you can see in the graph below, there is no correlation between a state's rural interstate infrastructure and its ability to create or retain jobs in the NAFTA era. In particular, Indiana is fourth in the nation in existing rural interstate density. It was second in the nation for job loss in the seven years 1993-2000.



This shows that despite being a leader in Interstate density, under our program of "Crossroads of America" we have become the leader in Job Losses. To continue down this path would be a terrible waste of money. There is no evidence that building another highway in Indiana would improve this trend, in fact cutting smaller and smaller pieces of land will likely make the possibilities more and more limited for other uses.
The study lists as best case a growth in jobs of approximately 1/4 of one percent over the period of the

study. This return on investment is far below that of known jobs development programs. It is hard to imagine a worse appropriation of money for economic development. Prior studies for this highway showed $1.53 returned for every $1.00 invested, but this was over a 30 year time period and was later corrected to a loss benefit return of $.84 per dollar invested. The original Donahue economic study of this project commissioned by Governor Bayh in 1990, found no benefit and recommended, no build. Given the chart above and the errors in in the DEIS that are being discovered with public comment. I believe that the "No Build option is still the only correct option. The current study does not include a cost benefit analysis, because none can show a benefit.

Federal Gas Tax should maximize transportation interests and not be thought of as economic stimulus, since this is obviously not INDOT's area of expertise.

The condition of Indiana's roadway infrastructure is poor. More than 1/3rd of our bridges fall below acceptable DOT standards. The surface of roads are so poor as to be dangerous. Many thousands of hours are wasted each week by Hoosiers stopped in metropolitan traffic jams. These problems will only get worse if our budget is directed at yet another interstate highway. The most expensive variation of the proposed routes is 3B. At an estimated cost of up to $1.8 billion dollars, that is three years of the entire INDOT budget that could otherwise be used to maintain and improve the existing roadways. Since this road would take an estimated 9 years to build, INDOT would have to reduce repair and improvement of existing roads by 1/3rd, or raise the gas tax on every tank of fuel purchased for ever in the future. Given the request for a $.15 per gallon increase this year, which was granted a $.03 increase that we will begin paying in less than two months, I assume that INDOT has decided that we will pay more for this highway. $.15 per gallon would be an additional $2.25 per 15 gallon tank full of gas per Hoosier for the rest of our lives. This money would be removed from the Indiana economy for other areas of commerce. Given family's of 2 cars using 1-1/2 tanks of gas per car, this would remove $351 per family per year in buying power to fuel our economy. It would greatly reduce the desirability of our fuel to cross country truck drivers if they were required to pay even a similar percentage for the road that would be of a greater percentage benefit to them. That is they might only use our interstate 69, yet always purchase their fuel before crossing our state if other states built their highway at a lower cost or at a time when it was able to be paid for in another way.

In this time of economic down turn after the longest economic boom in history it would be most prudent to fix the existing infrastructure and look for economic benefit from general overall road infrastructure improvement and investment of funds that can be found poured into education. Education will bring economic benefit. Raising the gas tax for a road that is not needed will not be a positive for the state.

Some persons make the mistake of thinking the building of the road is it's self an economic benefit, or that the homes construction that will replace those that will be destroyed represents new jobs. This is not true because the money that would would go to build this road, or even to the profit of home construction businesses or real estate offices, is highway money that will not go into transportation. All of the money that would be spent on the highway, would be spent by INDOT anyway, given no tax increase. Giving a portion of INDOT's budget to a homeowner to relocate actually moves money from transportation into the homes and real estate market. The Interstate highway builders make less money than if they were repairing existing roadways, because they do not have access to the acquisition funds for the land, buildings and protected natural resources that must be compensated by INDOT to build an New Terrain Highway. Bottom Line, we get less transportation per dollar of our Gas Tax money, while we maximize environmental, damage, by placing our bets on a division of our government that has a proven lack of success in developing a strong economy. If otherwise were true, wouldn't it follow that a state with a capital city with the most interstate connections of any in the country and with the 4th highest interstate density in the country would have at least one of the top 5 or 6 economies in the nation. The study needs to explain why a new highway will do what the old ones could not, and why fixing the existing intestates, state highways, county roads, and city roadway infrastructure across the state would not as greatly benefit

3.4.4

the state. The fact that Kokomo Indiana and Bloomington Indiana are among the top 5 cities in economic health in the state of Indiana points to the fact that Interstate Highways are not the silver bullet. Ones who claim otherwise are missing something. Most cities in Indiana on Interstate highways are not doing as well. These facts need to be understood.

INDOT's desire for another Interstate is like a person buying mag wheels for a car with a major oil leak and a rod knocking. Fix the problems you have got and forget the trophy.

Improved access of non interstate roads actually bring greater economic development than interstate highways!
Hoosiers see their state as a bicycle wheel with two spokes missing. The US-31 spoke is hardly noticed, because that corridor that includes South Bend, Kokomo, Carmel and Indianapolis is perhaps the backbone of the Indiana economy because they are on a US highway, and not an Interstate. Development along it is not hindered by limited access. Kokomo has remained relatively successful because the automobile remains as one of the last remaining consumer products that is still manufactured in the USA. Televisions, appliances, clothes, and now elevators are moving away from the USA.

Even NAFTA is not working. For the past decade, NAFTA has created that "great sucking sound" that Ross Perot predicted as Jobs have left the USA to Mexico. **Lower transportation costs can only continue the trend toward globalization of manufacturing.** This is likely understood by everyone, but the highway is being sold to the public on a hint that manufacturing might somehow return because of transportation. When this "NAFTA highway was planned a decade ago, perhaps persons actually thought trade would go both ways and that jobs would not go to the lowest wages, but that is a proven fact now. But it is very important that this DEIS study wake up to the newest fact of NAFTA. It is a totally failed treaty because now the jobs are leaving Mexico just as fast a rate. Jobs that did pay $20 per hour in the USA went to $3.00 per hour Mexican workers and last week NPR reported that those same companies have moved their operations to $1.00 per hour factories in China. They reported extensively from Juaraz, the boom town of three years ago, that the job losses are so bad that even housekeeping jobs are hard to find. The flow of goods show no trend of being from Mexico to Canada. China and Taiwan made goods dominate the trade deficit at an ever increasing rate. This trend needs to be disproven before investing Hoosier transportation dollars on a South North Interstate. The flow of Chinese and Taiwan goods is from West to East, not South to North. Wake up Indiana, before you make this ridiculous mistake. Don't buy us another I-64, a highway that is not needed at a price that will drain our economy for so far in the future that no end will be in site. Create a good secondary road infrastructure like that found in Michigan. 3.4.4

This Highway is not needed.

That the study never points to the traffic count on the existing roads points to the fact that the roads that exist are actually some of the most pleasant to drive in the state. One rarely is slowed below the speed limit and curves are gentle enough that you never feel any "g-force while going through corners. Stopping is minimal and even slower traffic is rarely a problem because of low density and the availability of at least three highway options from Evansville to Bloomington. The existing roads could be improved with a few well placed passing lanes and most travelers from Evansville agree that this is all that would be required to fix any problems? The inducement highway concept that calls for more trucks to pollute the area and destroy the natural unspoiled beauty is exactly what will ruin the reason why many people live in the area.

The "Core Value" System of this study is totally out of step with Hoosier values and is so rigged as to be obvious to anyone who stops to think at all.

That this study is a required "environmental study", yet the study can conclude that the most damaging, most expensive route is the winner of the "environmental study" while the least damaging and least expensive routes are the least desirable is outrageous. That the study is "Core valued" into speed and money makes one wonder why the federal government called it an Environmental rather than an economic expressway study? Stop and smell the roses is a phrase that residents understand more than the Interstate proponents who see only a underdeveloped wasted land that needs to be as quickly as possible traversed to get from one congested area to another with as little time between as is possible. I am doubtful that the farm economies of Daviess and Hendricks County is visible to these city slickers as well. This "core value" is not the core value of the residents of the area who will have their homes taken and their neighborhoods destroyed along with friendships and divorces and early death of persons aged. The "core value" system of the study is The human destruction that will follow is captured in the speech that I gave at Bloomington High School North on August 20, 2002. I called for a Center for Disease Control Study of the emotional and physical health results of forcing persons from their homes. My "What will be the toll in deaths, illness and divorce to this destruction of citizens homes and neighborhoods is included as an attachment. "Core values" must reflect those of residents of the state not a those of a small group of people in an Evansville or INDOT board room.

The Losses in home equity need to be SUBTRACTED from the recognized benefits of the interstate. 5.2

My wife and I searched for three years for our home. Homes like ours are always sold before they are listed publicly with realtors. The lack of noise and light pollution are among the features that were a must, as well as a distance of 10 miles from Bloomington. We can regularly see the Milky Way and often stand in our yard for 15 minutes in the day time and not hear a human sound. Our house was listed in the newspaper 1 day in a classified ad and the owner got twenty offers to purchase and chose us. We have gardens that are more like those found in France at the house of Charles Monet than any I have seen. Eight Acres, Greene County, Two Bedrooms, does not describe what we own. That which is now worth 1/2 what it was worth before being targeted by the I-69 project. Our loss of $70,000 in year 2002 dollars equals two years of geriatric care for me in my declining years. As one who invested very poorly in our stock market, and who is a self employed businessman, my home equity was my ability to die in honor. The loss of this equity is a true monetary loss to the economy of the region. If I do not sell, I will not be able to provide my care givers payment for as long before I become a burden on the taxpayers. This is a real loss in equity for the state. This negative number, the reduction of value to real estate within one mile of the road needs to be subtracted from the benefit. This amount has been estimated as 1/2 of the equity up to 1 mile away by a Michigan study. A similar number must be established for this study.

The travel time increases to local residents crossing the interstate are very real losses and they need to be SUBTRACTED from the savings in time for the interstate users.
The core value of "access" that views the interstate only in the one dimension along it's continuous asphalt pathway is totally unfair to those Hoosiers who will pay for the highway. Looking at the maps that pass within 1200 feet of my home, if I walk to my neighbors home now, it takes 5 minutes. If our houses would both survive I-69, the walk would increase to two or 3 hours and the drive time will be on the order of 20 minutes. Steve Howard who is a major supporter of the Interstate highway recognizes 800,000 persons in the corridor. If we were to assume that 1 in 8 persons will be slowed in their travels because of crossing this interstate, or because of further traffic congestion nearby, then this would be 100,000 people. If we suggest that on average these persons spend 5 minutes per day slowed because of the up to 60% of the roads that it crosses being closed, then we will loose 500,000 minutes per day. This is 8333 hours per day, or 58,333 hours per week and 30.3 million hours per year lost to this highway by the residents who have to negotiate under and over it's limited access nature.

If one wants to challenge the numbers, the concept is still factual. There is some real number in the loss of time to residents that needs to be subtracted from the gained "access/ core value" recorded in the study. This is again one of these clear stacking of the deck tools that has so maddened Indiana citizens and make us look at our government, the consulting firm and the process as unfair.

That these highways stifle development between the intersections is undeniable as one travels the interstate system. I often ask persons in small towns like Bloomfield, which city along I-64 that they would like to emulate. They always say that I-64 was not justified by the study and it should not have been built. I contend the same is true of this highway.

Person think that they see growth, because they overlook the diminishing or the death of businesses that loose traffic to the Interstate and the movement of job from the near to the far. In the case of this proposed Interstate, if it is built elsewhere, the existing US 41 businesses will loose a majority of their traffic and be given no compensation. As one who has moved my bicycle shop two times in the past when Landlords have decided to tear down my building for another, I can say with experience that moving a business is a positive. Moving ones home is a totally different experience. One that I had hoped would never happen. I had planed to die here. If I-69 is successful, then a portion of the traffic will be vehicles that would have traveled US 41 or US 65. The business moved from those locations is not growth. Persons traveling from small towns to bigger cities to work from longer distances has a negative effect on the qualities of life for everyone, while not adding to the employment base if the person were working in an Indiana town before getting the big city job. Added travel distance uses more fuel. When looked at in conjunction with the example that I gave above of walking time from my house to my neighbors changing from minutes to hours, it is clear that new Interstate highways do not move us any closer to the goals of the current Tea 21 laws that set as national goals the reduction in car trips of 10 percent. The proposed I-69 would actually increase car trips and distance of car trips as well as the overall time of all car trips in opposition to the stated goals of our DOT. There would be no benefit to Evansville for it's air quality problems and in fact the problems would be increased for the same reasons of increased sprawl travel that would result that would give Evansville the look of growth while stealing the economic vitality from the hearts of small towns like Washington, IN as has been seen over and over with every interstate highway project. That the County Seat of Greene County does not get an exit closer than 8 miles shows that the proponents arguments of economic development of Greene county were shallow promises. Currently two of the major routes from the south to the north in this region pass through Bloomfield. No traveler will make the mistake of exiting the interstate and driving to Bloomfield by accident. The city will be stripped of all through traffic. The residents will spend much more of their income in Evansville after driving 12 miles to the Scottsdale exit. Bloomfield will die an ugly death, much like a Route 66 city. Washington Indiana is perhaps Indiana's most beautifully preserved city. It stands alone in seeming unchanged by our big box store mentality. It's downtown is vibrant, yet stuck in time. The Amish community provides many excellent restaurants that draw customers from far away. The magic of Amish will disappear in a flash. Some will call it progress, but what will be lost is small city charm, that is almost extinct. If one wanted to make a sequel to American Graffiti, you would only need to change the decade of the cars. The Church by the Mound South of Scottsdale is another magic place. I watched a very old lady paint a picture of the church while the woman minister played her accordian with electric bass guitar accompaniment. The the sound of the wind was evident as we enjoyed the view across the fields. This will be lost to a noisy stinking interstate next to the geological wonder of the mound that I wouldn't be surprised if INDOT decided to flatten just for the fun of it.

The most magic place on all of the routes is the twin antique bridge area of the Patoka Wildlife Sanctuary. Why we would be willing to give this to a highway is beyond me. Especially a highway that is unneeded and unjustified and fraught with the look of corruption regarding the placement of intersections and the flow of contracts and donations that appear a little too cozy. The division of this wildlife area will create a break in this preserve that is criminal. Someone in our federal government needs to get down there and say STOP! These kinds of places will not and can not be replaced by INDOT even if they had any sense of understanding of National Wildlife Preserves. One has to wonder who in our federal government is amiss in their "preservation" duties here.

The privately owned natural area of Green County between Scotland and Hobbieville is perhaps just as much in danger as the Patoka Wildlife Sanctuary and Washington Indiana, in fact getting back to our pioneer roots is easiest in this area of any that I have experienced in all of Indiana. The Ashcroft church and the Ashcroff log cabin make me think that there is federal recognition of this area possible that should not be allowed to be missed as this project would bulldoze over what can never be saved.

Further north is my own neighborhood of Maryland Ridge. It's national importance has been reported in the notification to this study by our community, so I will not duplicate efforts here.

The karst topography of this region I believe renders building the I-69 highway impossible. While I am not an expert of geology, I traveled up and down all the roads of routes 3 and most of 4 and 5. I had the DEIS atlas on the seat beside me for hour after hour for the past 2 -1/2 months as I delivered maps to homes, businesses, farms and churches within 1000 feet. I have seen the accuracy of the maps. I have seen almost no missing homes. Only one major church is missing it being being the Mount Zion Church on 142 and Heremont Road on Alt. 3 map 20 of 32, but it seemed every owner of ten acres of land in the Green County and Monroe County area knew of one, two, three or more Karst features that were missed by the study. I think an accurate study of the Karst features of the region will render building of this highway through this region impossible. A truck driver pointed to the maps and said, "This doesn't look like an interstate, look at all those curves, what is this all about." A GIS expert said laughingly, "I see their problem, they are trying to snake this thing past one karst feature after another", one runs them into the next. 4.1

To chose any of the alternative routes 3 without first doing a more serious Tier I study of Karst would be stupid. To eliminate other routes to learn that this one is impossible would be to further waste Indiana taxpayers money on Bernardin-Lochmueller & Associates study of this project. Such obvious potential for impossibility to proceed on this area of karst, so incompletely documented, could likely bring question to the idea that perhaps building the highway was never the object of the study, but that the payment for the study with tax dollars and return of campaign contributions from persons enriched by INDOT study contracts to those granting those contracts might easily be questioned. These ideas come very easily to large numbers of persons in our society in the post Emron, post WorldCom era. If it were me, I would step back and do a more complete geological and archeological tier I study, before proceeding on to a selection of "the route". In fact, I would recommend an independent contractor with no know association to any of the parties involved in the study to date do this study. It would seem unwise to select route three to the exclusion of other possible routes and then invest more public funds into a Tier II study, to ultimately fail to be able to build because of a shoddy tier I study. I would consult council to see if perhaps giving recommendation to proceed, might at some point actually leave one open to a difficult to defend legal action. Certainly care and prudence on the part of the consultants and politicians involved would be recommended in a national climate of public skepticism and perceived corporate greed.

I do want to call into question the notification procedure. In this day and age posting a notice with a vague map saying go to the library perhaps 20 miles away or more is not a reasonable notification. I have witnessed the ease of generating a mailing list to every person in Monroe and Owen Counties with GIS technology. The time to create mailing labels for every person in Monroe County on all three of the routes who owned property within 1000 feet of the route was less than a minute. The time to sort it by Zipcode, also less than one minute. The cost to mail the notification to 2000 persons less than $400.00. It makes no sense to have a law that says that notification must be made and then make that notification more difficult than necessary or perhaps as difficult as possible. Persons late paying for something as insignificant as their cable TV bill are legally required a written notice before disconnection. That one can pay your taxes in a timely fashion and do nothing else wrong, but not be granted written notice of intent to seize ones home and property is not at all like the United States of America that most residents would consider worth fighting for with pride. As Richard Lugar put so well,you should notify the public to the best of your ability. The labeling of the Atlas on your website was so poor that professional web designers took 2-1/2 hour to find appropriate maps. Persons have agreed that the maps are buried under three layers of mislabeling. 11.3

The question of access to the Freedom of Information request for GIS "Shape Files" is at least a public relations nightmare and again smacks of something that one would want to run passed a team of attorneys. Perhaps it should be questioned if this is grounds for reopening the comment period after this data would be provided. If it were the decision of Bernardin-Lochmueller & Associates to deny access to INDOT the GIS background information I can not believe that the public would ever tolerate future contracts granted to the firm. This is especially true considering the amount of money we have given your firm for various projects over the past decade. Of course we have to suspect that it is not the consultants at all who are denying the data to our INDOT, but perhaps more likely INDOT who is requesting not to be granted the underlying data so as to deny citizens the factual basis for the study. We perhaps will never know for sure what the dynamics of this are, but again something here is not the United States of America that is taught in our schools. The underlying principles of government by truth seem a lot more Soviet-like in this case.

As I wind up my comments, I want to be sure that you are aware that all of the bats that the study has reported as making 3A undesirable are also in the exact same relationship to 3B. Those bats that reside behind my home, also do a terrific job of stopping the mosquito population of the region. Dozens of the bats come out each evening in the warm months and feed for an hour or so along our woods, which is continuous woods from Buckner Cave, Small Dull and others to the I-69 proposals 3A and 3B. I would direct you to the comments submitted by Gary Milhoan. His include text from studies of the protected Indiana bats. The study suggests that protecting the summer habitat is equally important to the preservation of the bat. Among feature that I believe need particular care is a pond owned by Richard and Cheryl VanPelt. Other wildlife depend on this pond for sure, and given the text of the Gary Milhoan provided article, I would surmise that this pond is important to the bats survival for drinking water. The article also points out that the bats travel great distances to the summer nesting spots. The situation is so delicate, that again this should be reason to think long and hard before choosing to move forward here. Given the fact of West Nile Disease with no solution in the near future, the preservation and restoration of this bat population should likely be a very important goal. The protection of bat habitat could be a best defense against this natural menace.

I suspect that others have informed you, but I have heard of two or three caves that the opening is exactly under the road. I have not confirmed these, but I could take your investigators to the locations described to me. One is right behind the old Ivy tech location, and the other is on 3c between hobbieville and US 37. Both of these are right in the center of the road I am told. There is another one close to the mouth of the cave, but not directly over it. 5.24

John Smith Comment presented August 20, 2002 -BHSN

I have opposed the building of this highway publicly for over ten years. I called for the "No Build" option and now support the Indiana 40 - I-70 plan. I learned last Sunday, August 17th 2002 that my historic, blissful green county house with its forest and gardens is on the two most favored routes. I want to title my comments:

"The I-69 Toll Road. What will be the "Toll" in stress related strokes, deaths and broken family's, from of this new terrain highway". I hope my comments will trigger another chapter in the environmental study.

I have tried to think of an act of nature that would destroy so permanently so many Indiana homes, families and lives. If the New Madrid fault opened up and swallowed this much land it would be a natural disaster of biblical proportion. No Indiana forest fire has ever destroyed so many homes and I doubt that any have. In Indiana it's like the biggest tornado ever, that knocks flat every house in a very wide a swath from Evansville to Indianapolis, with a lasting roar that may never stop. There has never been such a tornado. A flood that over runs it's banks like the one in Germany right now and washes away the homes along it's path is more like it, but even then the homeowners had some idea of the possibility when they chose their location. The same is true of hurricanes and tidal waves and volcano's which in Green County I thought were not a possibility. The thing that nature never does is takes the land. It's there to rebuild on with life long ties to one's neighbors and family.

Nature is not as cruel as the moneyed persons and the brainwashed who would request this unnatural disaster to sweep across our state.

Moving and money difficulties are two of the top three causes of stress related illness, death and divorce. I am sure that many Hoosiers emotional and physical health is not up to this challenge. Death and family destruction will follow in the wake of a New Terrain, I said "New Terrain" highway. What will be the death toll? How many new stress related divorces and disabling health related problems like heart attacks and emotional disorders? I would hope that this study would include a Center for Disease control assessment of this environmental effect on the thousands of southern Indiana homeowners and their children involved.

Indiana rates in the top 3 states in the number of interstate Highways entering and leaving. Indianapolis has more Interstate highway connections than any other City.
More than New York, Chicago, Houston, Seattle, Los Angles...Any. We don't NEED this highway. Please take our compromise of IN 40 - I-70 and let us keep our lives.

For the like minded, please join me in a Carr rally of the new terrain routes from Evansville to Indianapolis. Let's be seen and heard and let's be counted.

From: Tom Robbins [mailto:Thomas_E_Robbins@hotmail.com]
Sent: Thursday, August 15, 2002 11:51 AM
To: Indiana Dept. of Transportation
Subject: Attention: J. Bryan Nicol & Mike Grovak

Dear Sir or Madam

Can you please forward this to the following people?

Mike Grovak
Project Manager
Bernardin, Lochmuller and Associates
6200 Vogel Road
Evansville, IN 47715

J. Bryan Nicol
Commissioner
Indiana Department of Transportation

Indianapolis, IN 46204-2228

Dear Gentlemen:

As a resident of Johnson County and the State of Indiana, I would like to appeal to you on the issue of extending Interstate 69 from Indianapolis, IN to Evansville, IN.

One need not be a visionary to understand the economic rewards for a state such as Indiana that sits within a day's drive of a majority of the U.S. population, has no inventory tax, builds an extension of I-69 from Indianapolis to Evansville, and observes daylight saving time so it is in sync with the rest of the world. The confluence of these three public policy changes would further position Indiana as a major distribution hub, setting the stage for vital economic activity in e-commerce and potentially explosive growth in our distribution logistics industry. Of these three needed policy changes, the inventory tax officially is set to be phased-out over five years (effectively sooner) as a result of recent tax restructuring, and the extension of I-69 through southwestern Indiana is more a question of "where" and "when," rather than "how" or "whether." Advocates continue to pursue grassroots support for daylight saving time, as well as legislative remedies at both the state and federal level.

The Indiana Technology Partnership supports the construction of the most direct route possible between Indianapolis and Evansville for the I-69 highway, one that maximizes the economic benefits to the state while linking key centers of technology and commerce along an ecologically conscious route.

Within the context of the ongoing Environmental Impact Study (EIS), route selection will play a critical role in determining the long-term economic development benefits of the I-69 highway through southwestern Indiana, as well as the costs (both environmental and financial) and timetable associated with its construction. A less than optimal route selection could have a serious adverse effect on the economic development potential of the project.

At this critical stage, the state and especially the Indiana Department of Transportation (INDOT) are to be congratulated for the thoroughness of the process thus far and for maximizing public input.

We applaud INDOT for the results of the initial Purpose and Need Study and the work completed to date on route selection. This work has become especially important in light of so much distorted or incorrect information concerning route comparisons appearing in interested party advertisements and the media.

The final route must achieve the goals set forth in the Purpose and Need Statement. The I-69 highway is a critical part of building a higher technology economy in Indiana for the following reasons:

1. This highway will not only be a U.S. Interstate, but part of an international trade corridor linking Canada, the United States, and Mexico. It will link Indiana to our country's top two trading partners and allow increased access to export markets.

2. If fiber optic cable were laid with this highway, in conjunction with other fiber optic nodes and junctions, both systems would expand the value and utility of the other. The future impact to the economy of the whole of southern Indiana should not be underestimated. 3.4.4

3. This highway will connect existing interstates that intersect in Indianapolis, completing an interstate system that serves and benefits all regions of the state.

4. This highway will link Indiana airports, Ohio River ports and railheads to make goods, products, services and people that much more accessible and transportable.

5. The I-69 highway completion will also aid the linkage and cooperative efforts of several of Indiana's most advanced public and private universities, as well as make the state more accessible to the technology resources along the entire corridor, including those of Indiana University and Crane Division, Naval Surface Warfare Center.

For all these reasons and more, the I-69 highway is probably the single greatest economic development opportunity before the state of Indiana. The synergies and economic opportunities provided by the highway will continue for decades to come, setting the stage for an economic "rebirth" for southwestern Indiana.

In addition to economic considerations, a direct route for the highway may be built so that ecologically sensitive and attractive areas should be preserved as much as possible and we encourage INDOT to use existing highway paths where feasible. We encourage planning that not only optimizes the economic value of the highway, but also takes into account quality of life issues for the citizens of the state.

We therefore urge INDOT to maintain progress on the I-69 completion project and facilitate the most direct route possible that maximizes and leverages existing infrastructure and technology resources. Ultimately, such a route will facilitate the development of a higher technology economy in our state.

In turn, the highway will provide substantial returns on the state's investment now and for future generations.

Thank you very much.

–

Thomas E. Robbins
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0815-005 Robbins, Thomas.wpd

15 October, 2002

J. Bryan Nicol
Commissioner
Indiana Department of Transportation
100 N. Senate Ave.
Indianapolis, Indiana 46202

Dear Mr. Nicol,

As a graduate from Purdue University with a BS degree in Engineering, I was instructed in various methods for designing and/or updating present designs. Always, in my schooling, my instructors emphasized the designing of the product for the best reliability at the lowest possible cost. After reading the July 2002 Draft Environmental Impact Statement and reviewing the diagrams and drawings, it is apparent that the general guidelines in engineering design for reliability and lowest cost were not considered.

The one route which will go through western Monroe and eastern Greene counties looks as though someone has taken a ruler and placed one end on Indianapolis and the other end on Evansville and drew a straight line. This straight line now represents the proposed "New Terrain" I-69 Interstate. This is not only a terrible design, but it's also not cost effective. Have the people involved considered the overall cost and impact of this decision?

Let's take a brief look at this decision to build this interstate on the proposed route which goes through western Monroe and eastern Greene counties and the environmental/cost impact.

1. You will displace thousands of people from their homes and destroy thousands of acres of beautiful Indiana landscape. By constructing this interstate you will also displace farmers and destroy thousands of acres of productive farmland. All this destruction to save thirteen minutes of travel time from Indy to Evansville? Ridiculous. This country needs as much productive farmland as possible; therefore, it would be unwise to build this road through central Indiana. Our urban developments are continually infringing on farmland. The cities are getting bigger and the farmlands smaller. How will we plan on feeding our great grandchildren in the future if you and people like you continue to needlessly destroy precious land?
2. You will destroy the many hibernaculum for the Indiana Brown Bat which is prevalent in this area (and on the endangered species list). We have anywhere from 7 to 10 bats per evening in the summer time at our home. As far as many are concerned, they don't care, just another rodent driven to extinction! These bats will consume more than their own weight in mosquitoes in one evening. For me this is comforting to know when mosquitoes are now carrying the West Nile Virus. I should also state that we have had Red Tailed Foxes in this part of Indiana; are you going drive them from this area and possibly into extinction, too? 5.17
3. You mentioned in your report that there were only a few caves in the western Monroe and eastern Greene counties; this was not a true statement. Per the Indiana University Geological Department, we have more than 100 caves in this area; was this data purposely left out of your report or just overlooked? There are also many caves that have been covered by dirt in hopes to seal them up. What about those caves? 5.23
4. You will spend over 1.8 billion dollars. Just because the federal government is funding a majority of this project does not mean that you should spend every dime you can get your hands on. I'm a tax-paying citizen, and this is a waste of my money along with all the other American citizens who pay taxes. It is time that our elected (or appointed) officials become fiscally responsible with taxpayers money, and in this case, not spending all of it on a road that is not needed in this part of Indiana.
5. You will destroy the many water tables in this area which affects those people with wells. In a time period when resources are a valuable commodity, it seems as though no one cares-the only thing that matters is the bottom line. 5.24

My response to comments I have heard (or read) regarding the proposed "New Terrain" road:

1. I have heard many politicians make the comment that "this road will stimulate the growth of business along its route." This comment is false. I lived in a northern suburb of Chicago for 28 years. I have traveled from Chicago to Milwaukee many times. Do you know what? The areas that were not economically developed never did develop. The only areas that gained economically from I-94 were the cities (albeit the large ones) that were already economically developed. Have you traveled from Indy to Merrillville on I-65? I have for the last 17 years. Guess what? Most of it is still farmland. Where are the big booming businesses? There aren't any; only Zionsville, Lafayette and Merrillville have grown. Why? Because they were already economically developed! So much for the economic growth theory related to Interstate-highways! 3.4.4
2. You made the comment, " I am the sole person who makes the decision on where this interstate will go". I feel this responsibility is too great for one individual to determine, especially when thousands of lives and acres of land are at stake. Hasn't anyone questioned your authority in this matter before? If not, I do. In the American justice system a jury of twelve people decides the fate of one person, and this is an unbiased judgment based on all the reported facts. In our scenario, we have one person (you) deciding the fate of many which is rather biased depending on who has the most influence.

Now, my views on which route should be used for the I-69 interstate.

1. From an engineer's viewpoint, the only roads to use are I-70 and US 41. I chose these roads for the following reasons:
   a) The cost of the I-70/41 route will cost approximately $800,000,000 versus your $1.8 billion. In basic mathematics that's a savings of 1 billion dollars. Enough said.
   b) You will use an Interstate (I-70) which is already in place. No updates will be needed except for a clover-leaf or exchange. Besides, Terre Haute wants this road.
   c) US 41 is a four lane road that has been in place for many years. Upgrading this road will displace less businesses and homes. It will also benefit truck traffic from southern Indiana to Chicago. Who knows, maybe you could use the other 1 billion to finish US 41 from Terre Haute to 80/94. This would benefit all those trucking firms that are placing thousands of dollars in political campaign funds every year that help sway decisions of politicians for what they want, not necessarily what is right.
   d) Sure, this route may not save thirteen minutes, but trucks (semi's) and cars do not observe the speed limit on Interstates now. The time lost using I-70/41 will be made up by drivers exceeding the posted speed limit (which always happens anyway).
   e) The other routes that have been chosen will not be used, thus saving thousands of acres of land and allowing people to stay in their homes which they have worked so hard to get. It will also save the environment in terms of animal habitats, water tables, forests, noise and pollution. It will also save the rich history and beauty of this part of Indiana.

Regarding your comment, "the silent majority wanting this road," I have one suggestion for you. You should personally visit every home and business in the path of this road and tell them, "Hello, I am J. Bryan Nicol, Commissioner. I have decided to run I-69 right through your home (or business). What are your thoughts on my decision?" At this point, you will find out in no uncertain terms how much the "silent" majority does not want your road. The only people that want this "New Terrain" road is you, the politicians, biased newspaper owners and the trucking firms. Maybe you should listen to the people of south central Indiana, not politicians, newspaper owners and trucking firms; it's our lives you're destroying, not theirs.

Regards,
Brian K. Mathis

cc: Gov. O'Bannon, Sen. Luger, James Juricic, John Baxter, Robert Dirks, Linda Weintraut, Larry Heil, Matt Fuller, Tommy Kleckner, John Goss, Betsy Merrit, President, Greene County Historical Society

Bloomington
The extension of Interstate 69 through ~~the proposed area~~ would destroy the area where I have my happiest memories. It would destroy a church built during the Civil War. It would destroy a neighborhood tradition of gathering together to celebrate Christmas. It would destroy an area where I take my friends from the city to show them just how beautiful south-central Indiana is and how proud I am to call this area my home. 5,3

The state is going through an economic crisis; Indiana does not have the money to build a new interstate. It will not create as many jobs as a more traditional rural economic development plan would (such as rural enterprise zones, two federal government economic development programs, business incubators and local industrial development groups) and it will be millions of dollars more expensive. 3,4,4

We cannot allow this interstate to eat up our tax dollars and destroy the lifestyles of so many. Please help us stop I-69.

Katherine Jochim

Katherine Jochim
R.R.3 Box 298
Bloomfield, IN
47424

Indiana Farm Bureau Inc.
Office of the President
225 S. East Street • P.O. Box 1290 • Indianapolis, IN 46206
Telephone: (317) 692-7750 • FAX: (317) 692-7011

November 7, 2002

Commissioner J. Bryan Nicol
RE: I-69 Comments
Indiana Department of Transportation
100 North Senate Avenue, Room N755
Indianapolis, IN 46204-2228

Dear Commissioner Nicol:

Indiana Farm Bureau is the largest farm organization in the state of Indiana with over 280,000 members. Farm Bureau members, whether as farmers, landowners or citizens of the various communities in Southwestern Indiana, will be directly impacted regardless of the specific Interstate 69 (I-69) route chosen. Indiana Farm Bureau appreciates the opportunity to provide comments regarding the Indiana Department of Transportation's (INDOT's) Draft Environmental Impact Statement (DEIS).

Indiana Farm Bureau supports the development of I-69 in Indiana. Transportation is vital to Indiana farmers and rural communities. Rural communities and farmers in Southwestern Indiana will benefit from improved transportation routes between Evansville and Indianapolis, whether through better access to off-farm employment, improved health care, or domestic and international markets for agricultural products. 3.4.4

Indiana Farm Bureau does not prefer a specific I-69 route. All of the proposed routes will take land from and adversely affect certain Farm Bureau members. We value all members' land equally and do not prefer any member to another.

Indiana Farm Bureau appreciates the consideration of farmland and prime farmland in the DEIS analysis. We believe that farmland should be recognized as being developed property. Through improvements, technology, and ingenuity, Indiana farmers have transformed unproductive or less productive property into productive farmland. This farmland should not be the first choice on which to locate new highway construction. We oppose the construction of new highways on new terrain, especially farmland, and favor locating new highways along upgraded existing roads where feasible. 5.20

We offer the following suggestions for INDOT to strongly consider when deciding on the final route and as the process to construct I-69 continues.

1. We recommend that during the planning and construction of I-69, overpasses, underpasses or tunnels be constructed where existing roads are cut off so that emergency vehicles, school buses, and farm equipment may get from one side to the other without requiring miles of extra driving. Adequate access should be provided for livestock and equipment to move from one side of the highway to the other, where the highway has bisected existing farming operations. Also, we recommend that the number and location of interstate highway interchanges be sufficient to provide additional access for citizens of rural areas and rural communities.

1107-685

2. We oppose any highway design that indiscriminately divides existing farms. We encourage INDOT to work closely with local communities, farmers and Indiana Farm Bureau to ensure that, if construction across new terrain is necessary, I-69 be designed to follow the boundaries of farmland so as not to split the farm or disrupt access to the farm. 5.20

3. Adequate drainage must be constructed and properly maintained by either the state or federal government when limited-access highways are built so as not to reduce the value of adjacent and contiguous agriculture land. If adequate drainage is not provided, landowners should be compensated for the reduction in the investment backed expectation of their land. 5.20

4. We recommend that INDOT be financially responsible for repair and maintenance of roadside drainage structures and fences located on state highway property if they were designed and installed by the state during the original construction or reconstruction of the highway. 5.20

5. Farmland should not be sacrificed to mitigate conversion of other valued natural resources such as wetlands or endangered species habitat. Because productive agricultural lands are a vital resource, we support voluntary, incentive laden policy designed to encourage the protection of these lands as a base for future food production and a viable agricultural industry. 7.1

Thank you for your consideration of our thoughts and recommendations. Indiana Farm Bureau looks forward to working with INDOT as this important project proceeds.

Sincerely,

Don Villwock
President

[redacted]

August 20, 2002

Re: Indiana Forest Alliance initial comments on the I-69 Tier 1 DEIS.
We reserve the right to supplement and expand these comments.

The Indiana Forest Alliance is an all volunteer, non-profit educational organization dedicated to protecting the forests of Indiana for future generations. Our membership of over 500 Hoosiers across the state are primarily located in Southwest Indiana and hold a strong interest in the impacts to forests and the greater ecosystem and the impacts to a future of sustainable economies.

The Indiana Forest Alliance strongly opposes any new terrain option for I-69, and strongly advocates for an alternative economic development plan involving shipping and passenger rail to be considered. The Indiana Forest Alliance recognizes the significance of the fact that the DEIS reveals Alternative 1, the "no-new terrain" option to be the most inexpensive and least harmful to the environment, public health and the rural way of life.

The Indiana Forest Alliance would like to highlight the potential direct and indirect impacts toforests found in the DEIS. Unfortunately, the DEIS has not been available for download off the internet as was advertised, so a more detailed analysis was not able to be done. This information is from the summary of the DEIS and the charted comparison of all the alternatives.

The forest habitat of Indiana is critical to our culture and the ecological integrity of the land. It is vital not only for the survival of threatened and endangered species, but also for the protection of life as we know it for our own species. Forests function both on a local and global scale, affecting biodiversity and wildlife habitat, soil quality and retention, water quality, air quality, weather patterns, aesthetic qualities, and experiential opportunities across generations. Any decision to "withdraw" from this forest system comes with consequences both locally and globally, and the decision makers for the highway cannot hide from the relationship of forests and the ecosystem to the great responsibility vested in them regarding this mega-highway. Our hardwood forests have a rich place in our past, present, and hopefully our future.

Indiana has been lagging behind other states in many issues including air quality, water quality, and protection of public lands. In fact, only 3% of the entire state is available as public lands, an amount that is inadequate to sustain native wildlife populations and the impacts of human recreation demands.

Southwestern and South-Central Indiana in particular are endowed with forestland that are the foundation of its culture, its charm, its uniqueness, and a sustainable economy. Many public parks and forest are in this region, and other Hoosiers travel across the state to experience its winding roads and dense forests. What good is a road to get to somewhere if that same road diminishes the treasure you were trying to get to in the first place? It is an asset that most have failed to recognize, respect, and cultivate, as evidenced in the perception of the rest of the nation that Indiana is entirely cornfields and basketball hoops on flat endless fields. Southwestern Indiana should protect and enhance its unique forest beauty in order to attract business investors seeking hard workers and a high quality of life for them. In addition, we should really think of this as more of a question simply of "where do we locate a highway" but as choices of "where would we want to locate our family." The more we degrade our state, the less attractive we become for families, and the more we drain out the youth from wanting to stay.

0820-226

From the DEIS:

> "**Forests** - Alternative 1 would have the fewest forest impacts with 110 to 170 acres. Alternatives 3A and 5A have the greatest forest impacts with 1,505 to 1,580 acres and 1,525 to 1,565 acres, respectively. Figure S-15 shows that forest acreage in Indiana has been increasing over the past 60 years. *The I-69 alternatives, including direct and indirect impacts - would account for about 0.1% of the total forest acreage in 1998 for Southwestern Indiana.*"

- Clearly, Alternative 1 is the best option offered in terms of forests.
- The chart below shows the impacts of the 5 "preferred alternatives and Alternative 1.

	1	2C	3B	3C	4B	4C
Direct Impacts to Forests (acres)	110 -170	840-935	1315-1450	1140-1275	935-1005	805-935
Core Forests	0	85	440	398	142	97
Indirect impacts	70-140	215-285	310-380	325-400	150-205	220-290

Table 1: Summary of Forest Impacts of I-69 alternatives as determined by Tier 1 DEIS.

- The chart shows that not only is Alternative 1 clearly superior, but that alternatives 3B and 3C are particularly awful for forests.
- Alternative 3B and 3C are particularly awful for forests in part due to the severe amount of core forest habitat to be lost. This fact should greatly multiply the estimated "costs" of the project due to the high biological significance of this habitat and the rarity of it on the landscape. This is totally unacceptable and in conjunction with other pressures of the industrial world will put plant and animal species in jeopardy
- The issue of "core forest" also demonstrates why the statistic that is generated in the above excerpt from the DEIS summary is not acceptable justification for the loss. It may just be one statistic to consider, or one perspective from which to look at it, but there are many other that are equally or more persuasive. While the direct, physical loss of acreage in a slice of time may seem small, the affects of fragmentation may be far reaching, especially in an ecosystem already near the threshold of what it can withstand. Bisecting forests, especially with heavy flows of toxic traffic, has effects that reach beyond the footprint. These include the "edge effect,"

5.21

whereby the creation of unnatural levels of forest/opening intersection creates deathtraps for migratory songbirds and the exponential decrease in the viability of the forest for interior forest-type dependent species. 5.21

- Many in the state have a vision for core forest refuges based in the state forests and nature preserves and the Hoosier National Forest that could be connected in some manner by wildlife migration corridors. It is seen as essential for the job of restoration in the state of Indiana, and would be made severely difficult if not impossible by this highway disruption.

Questions:

Has the DEIS fully accounted for the cumulative environmental effects of all INDOT highway projects in Southern Indiana projected for at least the next twenty years?

What mitigation is planned should an alternative be chosen that would possibly impact Indiana bat hibernaculum?

What methodology was used to determine acreage of indirect impacts to forests in the DEIS?

What methodology was used to determine the impacts to private land logging economies, when considering that the highway may create market conditions that change a private landowners decision to harvest trees over the long term vs. sell to development? 3.4.4

Thank you for the opportunity to raise these issues and we hope that you will use wisdom and understanding and reject any new terrain alternative for I-69.

On behalf of the Indiana Forest Alliance,

Joshua Martin
Co-Coordinator

PO Box 1074
Bloomington, IN 47404

Subj: DEIS Comments
Date: 8/27/02 2:53:00 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Derek Moore
Address = 9120 South Snow Rd
City = Bloomington
State = IN
ZIP = 47403
Email = p27896@gd-decisionsystems.com
Message = Please build the new highway. Please build it as close to Bloomington as you can. I know the proposed routes have changed sinced the idea first began 10 years ago, but the old Line D (from 1991) is still the most direct route that offers Bloomington the best access to the highway. I not very polictically minded, and I don't care to carry a sign or play a Banjo to show my support for the highway. I will write this letter though.
To convince the naysayers, (I not talking about the extreme left because they just need a cause to fight against) have you thought about bringing in someone from SIA in Lafayette to explain the importance of I-65 in their decision to locate in Lafayette, Toyota in Princeton needing access to I-64, or even Georgetown, Kentucky Chamber of Commerce? Perhaps a a few people will understand that these are not paid spin doctors, but merely showing that a interstate highway is important. 3.4.4
I have rambled enough.

Thank You for your time,
Derek Moore

0827-016 Moore, Derek.wpd

Subj: DEIS Comments
Date: 11/2/02 9:50:41 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Charles Mitch
Address = 3210 Grove Parkway
City = Columbus
State = IN
ZIP = 47203
Email = cmitch@voyager.net
Message = "ECONOMIC REASONS FOR CONSERVING WILD NATURE"

The I-69 draft environmental assessment is fundamentally flawed and must be rejected as arbitrary and capricious. The assessment blatantly exaggerates economic benefits from new terrain routes, while failing to properly account for the environmental damage and destruction that would be caused by new terrain routes. The assessment also fails to recognize the economic benefits that come from the preservation of natural areas in an undeveloped state. Recent economic studies demonstrate that the economic value of natural undeveloped areas may greatly exceed the feeble economic gains resulting from the strip-mall type of development most likely to result from new-terrain highway construction. A recent economic study published in Science (2002, 297, 950-953) titled "Economic Reasons for Conserving Wild Nature" provides an example of the kind of economic analysis that needs to be done in order to properly assess the economic losses that would come from new-terrain highway construction. 3.4.4

Suburban sprawl and loss of farmland are serious problems for Indiana. Development of a new-terrain route for I-69 will greatly exacerbate this problem for future generations. I urge you to reject construction of new-terrain routes for I-69 because they would not be in the best interests of the PEOPLE of Indiana. The common-sense alternatives of either upgrading US41/I-70, or the new build at all option, must be selected to serve the best interests of the PEOPLE of Indiana.

1102-006 Mitch, Charles.wpd

Subj: New I-69 Study Form Feedback
Date: 11/4/02 7:40:51 PM EST
From: cafandeif@skyenet.net (Carl A.Forsberg)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Carl A.Forsberg
30 Oak Court
Hartford City, IN 47348

Message:
If a corridor between Mexico and Canada is the objective,why not consider a railway? 3.4.5

There doesn't seem to be any benefit for Indiana in adding a highway between Evansville and Indianapolis.If an improved connection is needed itis a good time to start highway renewal(nee urban renewal).

Not only should Hwy 41 be rebuilt between Terre Haute and Evansville but it should eventually be rebuilt north to connect into I-65,bypassing Indianapolis and saving 10 minutes from the Indiana Burns Harbor industrial complex to Evansville.

Something in this whole project defies logic! There doesn't seem to be much benefit for Indiana.

If we still must accept the idea--let Mexico and Canada finance it!

Carl A. Forsberg

1104-025 Forsburg, Carl.wpd

Subj: DEIS comments
Date: 11/7/02 1:45:13 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Donna
LastName = Moore
StreetAddress = 801 Carlyle Place
Address =
City = Indianapolis
State = IN
ZipCode = 46201
Email = DMoore1220@aol.com
Comments = As a semi-truck driver, I frequently drove from Indianapolis to Evansville. For three years, I made that trip almost daily, Monday through Friday. The route I used 99% of the time was I-70 west to US41 south. The other 1% of the time I took SR67 south to SR57 south. Even though the SR67/SR57 route was shorter, I chose the I-70/US41 route only because it was faster (many drivers, both commercial and private, drive at or above interstate speeds on open sections of US41). My route preference, because I was paid by the mile (using Household Mover's Guide miles) not by the hour, would have been to use the shortest route available, the SR67/SR57 route. To me, however, the extra time it took to travel that route could not justify using it. 3.4.5

Therefore, I must cast my vote for the I-69 extension to use the proposed 3C alternative. Even though the cost for this alternative is higher than others, I still feel it is the best alternative proposed.

1107-057 Moore, Donna.wpd

Subj: New I-69 Study Form Feedback
Date: 11/7/02 1:44:04 PM EST
From: jperry@usg.com (James Perry)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

James Perry
442 BJ Blvd
Bedford, IN 47421

Message:
I support the New Terrain Route Alternative 3. I'm a manager at United States Gypsum Company located in Shoals, Indiana. This alternative will help keep our facility competetive in the future by allowing us to secure favorable freight rates for inbound and outbound freight. 3.4.5

1107-056 Perry, James.wpd

-308-

August 27, 2002

Governor Frank O'Bannon
The Statehouse, Room 206
Indianapolis, IN 46204

Dear Governor O'Bannon:

I'm writing to you as a supporter who voted for you, donated to your election campaign and who admires your contributions to and support of the arts and culture in our beloved state. I know that you too, love the unique heritage provided by the exceptionally beautiful environment of Southern Indiana.

Barry and I came to Indiana in 1969 and settled in Owen County a few years later. We've lived in the same house for over 30 years, devoted to caring and preserving the habitats of wild life, especially the flowers, butterflies and birds in the 110 acres surrounding us. It is a spiritually uplifting and precious world. During those years I've worked for IU, and there too, my efforts have concentrated on preservation in this case of our cultural heritage. One of our greatest accomplishments was raising the $500,000 in federal (NEA) and foundation (Getty) funds to restore and preserve the Benton murals. Those murals tell the history of Indiana- a history that has its good as well as its bad points. One of the most striking low points of Indiana history has been the profligate waste and destruction of natural resources over many decades. The natural gas that was squandered in the 1860's is a famous case in point. But we've wasted a lot more than that, and we're about to embark on something even more catastrophic.

Last week, I attended one of the open meetings for the proposed I-69 routes, held at Bloomington High. The matter was personally urgent because 3 of the 5 preferred routes cuts right through or past our property in Owen County. Even if they didn't, I'd still

object to many routes on the basis of preservation. All but one of these routes is new terrain and most cut right through the heart of Southern Indiana! Like nearly everyone there, I oppose these routes for several reasons:

- The goals these routes are to achieve and by which they are measured to became preferred or non-preferred are mutually exclusive! The corridor between Mexico and Canada is not an ordinary inter-state highway. It is an *international* corridor- a limited access truck route that promises to become 12 lanes wide in some places. While such a route may have its benefit regarding transportation and trade, this is not the means by which the other stated goals (shortening travel time between Evansville, Indianapolis; improving access to Crane; linking rural communities) can be effectively achieved. 3.4.5
- Indiana is best served by an I-69 corridor using existing 41-70! This alternative clearly is the least destructive environmentally; it is wanted by Terre Haute; it runs along a shared border with Illinois permitting that state to also utilize this corridor. Such an alternative does not run through and for ever destroy the rich, diverse, beautiful natural heritage which makes Southern Indiana so distinctive.
- This I-69 alternative is also the least expensive.
- Indiana could use the savings to improve the existing highway infrastructure. A normal improved highway system linking Evansville and Indy makes sense. Improved rural roads also make sense.
- Indiana's leadership can do much better by rethinking their goals for highways in Indiana and the best means to achieve them.
- Indiana wants to improve the economies of local communities- do so by thinking creatively! Businesses flourish when access is reasonable. They don't require interstate highways. Communities flourish when they have unique cultural experiences to offer-- they exist in abundance. We've got covered bridges in Rockville; we've got art in Nashville; we've got music, art and theater in Bloomington; we've got historic houses and great food in Madison; we've got flower farms, orchards and organic farms developing constantly. Let's just improve roads to get there. And while we're at it- let's build better bike trails (a favorite and famous

Indiana recreation) and better hiking trails and promote these regional and distinctive treasures!

- Indiana has all kinds of regional crafts- promote them and give us reasonable decent rural roads to reach them! People are craving the chance to see something distinctive and unique. People enjoy driving on quiet rural roads. That's what our state is all about and that's what our leadership needs to foster and encourage. An I-69 corridor ripping through the heart of this state will produce nothing but McDonald's, gas stations, jiffy stops and other chain stores. There is no real benefit to this!
- Most importantly, in the 21st century, we need to be looking at the proper strategic mix of transportation issues: from mono-rails to bike trails- so that the quality of life in the 21st century *preserves* what is best in our state and makes using rural roads a joyful recreation- not a battle with massive interstate trucks! It's ironic that our Bloomington meeting took place in the same week that *Time Magazine* devoted its whole issue to the 21st century as a model of environmental issues working co-operatively with business to benefit everyone. How tragic if Indiana makes a decision that is backward looking to old technology, just as the nation as a whole is poised to utilizing new ideas and visionary approaches. IU has SPEA; your office has environmental experts- where is the team designing a better future building on and preserving our natural assets instead of destroying them?
- Bloomington wants better connections to Indianapolis- improve 37! Add some lanes if necessary. That makes more sense than running an international corridor through the middle of Indiana!
- Some years ago, I helped serve on a committee with Mrs. O'Bannon which created tool kits to give to communities so that they can document their unique heritage as we all entered the 21st century. Our new century is two years old and preservation of heritage should not be forgotten, it should be strengthened and fostered. Europe has known this for centuries. That's why Florence, Venice, Rome and many other places are swamped with (and enriched by) tourists. Let Southern Indiana's unique environment be the precious heritage that is preserved and let its communities develop by fostering local culture and enterprise, linked through well designed, safe and well maintained rural roads.

- Owen County, like Brown County and many other areas of Indiana have attracted artists, writers, photographers, poets, crafts people, gardeners, musicians, and many other talents. Indiana stands out in the literature on American art for the strength of its local artistic traditions. These are mainly based on the land! Don't destroy what is the bedrock of a proud and vital Indiana tradition-- support and strengthen it!
- Let your legacy be one that embraces this vision. Don't let I-69 become one of the worst chapters in Indiana's history by letting it run through the heart of this great state. Don't let your legacy be one of senseless destruction and fiscal waste. Please keep in mind that I-69 is not a normal interstate. Because of its size and the nature of its truck traffic, it will bring air pollution, water pollution, noise pollution and it's cost is prohibitive not only financially, but in loss of quality of life. Don't let Indiana become another California- desperately trying to extricate itself from dependence on a highway system now out of control. Let us protect what we have, and let future generations benefit from your forward looking leadership. Southern Indiana is a rare and precious place. My friends from Germany, Italy, Canada and all over the US always remark on its special qualities and its beauty. It is not to be found elsewhere. Yet I see it rapidly slipping away in the name of progress and development. I-69 running through the middle of this state would ruin much of it forever. Please don't let that happen!

Sincerely yours,

Heidi Gealt

Heidi Gealt
Barry Gealt Barry Gealt
Box 704 R.R. 5, Spencer, Indiana 47460

cc. Mayor John Fernandez
Lt. Gov. Joe Kernan

P.S. Enclosed is a catalogue for Barry's show in Germany - his subject: Owen County.

November 4, 2002

Below are my summary comments on the Draft EIS for I-69:

-I strongly support the alternative of upgrading US41/I70. This is the least costly alternative, and least damaging to communities and the natural environment.

-I urge that modifications to the route for US41/I70 be considered that would further minimize damage to communities. In particular, by-pass routes around the few more heavily developed sections of that roadway need to be investigated.

-The other alternatives involving new terrain construction rank high in the Draft EIS rankings primarily because of inappropriate weighting and emphasis on purpose and needs of secondary importance. The highway is intended, as any **interstate** highway to serve to efficiently and safely carry long distance traffic between major population centers. The US41/I70 alternative meets this purpose efficiently, being only about 12 miles longer than the new terrain routes, and connecting Indianapolis to Evansville through the largest other urban area in the study area, Terre Haute at much less cost to the taxpayers.

The new terrain routes rank high primarily because of inappropriate rankings of secondary criteria that relate to apparent benefits to local areas along the route, such as "connectivity" and economic development. Connectivity inherently puts undue emphasis on routing the highway through relatively low population, non-urban areas which tend not to have major highway connections already simply because population densities have not justified them. Economic development generally means simple moving economic opportunity from one community to another, something we should not be spending our highway money on. 3.4.4

-Safety should, along with efficient long distance transportation, be the primary purpose of interstate highway construction. Wasting on the order of $500 million on a more on an expensive new terrain highway based on dubious "connectivity" and "economic development" criteria is at the cost of safety on our existing roadways. I feel it is a certainty that Indiana highways would be vastly safer if that $500 million were used on well-justified, safety-oriented highway improvements rather than on this new terrain route. Use of "economic development" and "connectivity" to justify a highway essentially takes away from safety considerations, since any "purposes" like these compete with safety for limited funds. The $500 million could be put to very good use to improve safety on local roadways through SW Indiana, and the state as a whole.

-I have seen no evidence of coordination of planning between this segment of highway, which runs from I 64 to I 465 with the planning for the next segment to the south, through Vanderburgh County and Henderson County in Kentucky. Specifically, routes to the west of Evansville have been under study, with one west side route still under consideration. An efficient highway connection to the west side of Evansville would require extensive re-routing of I69 new terrain routes in Gibson County, in order to connect to the west side of Evansville. All the current route options terminate east of Evansville, which would require several miles travel directly west on I64 to connect to a proposed west side Evansville route, clearly an inefficient route. 3.4.5

Thank your for this opportunity to participate in the I 69 comment period.

Niles Rosenquist

732 S. Willow Rd.
Evansville, IN 47714

Kay Connelly... In 1990 INDOT commissioned a cost benefit analysis called the Donahue study about a new terrain I-69. Unfortunately for INDOT the study showed the enormously bad economic and environmental impact of such a highway. But instead of objectively presenting the results of the study they hired a PR firm and released a summary of the report which completely distorted the reports findings in favor of a new terrain highway. Now..... the people were not fooled back then..... and they fought the highway back. Today INDOT is presenting us with a new study and trying to make it look objective by using terms like computer model. Well..... they're having their experts interpret this data for us laymen. Well let me tell you..... as a computer expert who works in the Computer Science Department at IU..... that they think they can make a major decision on computer model is wrong. Sir..... as any computer programmer would tell you..... it is impossible to write a computer model without flaws. Even if the people hired by INDOT did their best to accurately model the world it's simply not possible. Further..... any computer model is only as objective as the programmer, since the person has to put into assumption and these assumptions are filled with their own biases, INDOT cannot claim that they are without bias in this matter. The previous summary of the Donahue study as well as their fancy personal highway displays..... their biases. For example the chart which is most detrimental to INDOT's preferred route is the cost part. Why is that the only part out there..... that is little table of numbers..... that isn't even ordered from minimum..... least expensive to most expensive instead of being a bar chart like all the others..... which would show what a bad decision this is. It is obvious that this study is seriously flawed by INDOT's biases and we should all soundly reject it. Thank you. **3.4.6**

0820-116 Connelly, Kay.wpd

PUBLIC HEARING COMMENTS

Ralph Cutter... Thank you, my name is Ralph Cutter. I am sorry I missed my scheduled date, I stepped out. Indiana needs jobs and they need industries, and we're loosing out to our neighboring states because we can't give them the entitlement or the enticements to get industry into Indiana. And now what I'm wonder has this consultant and has INDOT considered what 580 million dollars will do to entice industry to this state, I don't think so. I've never saw, I didn't see any of the figures. And I think that's got to be weighed in just as heavily as everything else. We've got people that need jobs, and you can help give it to them. I'll make one other point. We don't seem to be able to maintain our other federal and state highways as they are. Have we figured in cost of what the maintenance of this all these new miles are going to be, I didn't see that in the figures either. And I have one other concern, and that's when the Governor of this state has told us over a year ago, what route he wants. Does it make the rest of you think that's the way we are headed. I hope this isn't a farce for us being here. And its not something that you can then say you've been to Terre Haute, Indiana because we are going to make you remember it too. **3.4.6**

0819-078 Cutter, Ralph.wpd

The I-69 fiasco and reason number 15 why it should not be built:

Since INDOT seems hell-bent on building a new terrain highway no matter what the economic, resource, and human cost might be, I have undertaken a letter writing campaign to inform INDOT of their inherent ignorance of numerous points. I am writing this series of letters as a matter of formal public comment, and I fully expect INDOT to include this in their EIS and actually read and consider the points being made.

A fifteenth reason why a new terrain I-69 cannot be built is the high cost of maintenance associated with more miles of highway in Indiana. Indiana already has a shortage of funds to adequately maintain its existing road system, and adding over 100 miles of new terrain roadway would make that already existing problem much worse. The EIS itself estimates operation and maintenance cost increases of each alternative with alternative one being by far the cheapest at less than $300,000 per year while all other alternatives add $2 million to that number. This equates to an annual operation and maintenance cost of seven to ten times that amount. I suppose J. Bryan Nicols will cover this out of his own pocket. No, wait – the taxpayers get the short end of the stick again – as usual. 3.4.6

The fact that highway maintenance costs are very expensive is a fact, and it is irresponsible for any person, group, or agency to promote the building of a new terrain road without having taken into account not only where the construction money will come from, but the annual and perpetual maintenance costs that are associated with it. Already, INDOT has conned the legislature into approving a three-cent per gallon gasoline tax increase to help pay for existing road maintenance costs, and further, inexorably higher tax increases are unacceptable. INDOT and the state of Indiana must learn to live within their means. This equates to NOT BUILDING UNNECESSARY NEW TERRAIN HIGHWAYS! 3.4.6

Not only is there not enough money for construction of a new terrain road, there certainly is not money available for maintenance costs. That being said, this is just another reason why this road should not be built. If it is, it has to minimize new terrain by using existing roadways – i.e. US 41 / I-70. This alternative has already been shown by the EIS to be the cheapest in terms of construction costs and also maintenance costs. Since this route already has to be maintained as it is, it would be only common sense to upgrade this route and save on both construction and maintenance costs. Thinking people could figure this out, but the decision makers in this issue have apparently already been bought and paid for by pro-highway lobbyists.

A new terrain highway is UNACCETABLE in southwestern Indiana. The only two acceptable alternatives are to not build it at all (preferable), or to upgrade US 41 / I-70.

Wayne Werne
RR 1 Box 254
Ferdinand, IN 47532

Wayne Werne

1025-032

PUBLIC HEARING COMMENTS

John Braun… Keeper of the time, before I start the next speaker Mr. James Flickinger would like to yield to me an extra 30 seconds, then he can finish reading mine. Good evening, as of August 4th Indianapolis Star a newspaper editorial position concluded I-69 planners need to pull off and change direction and they're running out of exits. I think it's capital politics mandates the corridor 18th must be rooted through Indiana, then alternative number one still remains the only sensible choice of the five old alternatives that you brought to this meeting tonight. Even though INDOT and their marketers hardly want to mention it I'd like to remind the public that there is a sixth alternative choice, it is called no build. Our fiscal treasury balance in the State of Indiana is in the red and without substantial tax increases it's likely will remain that way into the foreseeable future. That my fellow Hoosiers is even after Governor O'Bannon reconvened our legislator for 40 days to fix it. Not only has he not ordered it slashed he actually supports a most costly all new terrain route to divide more neighborhoods, families farms, and forests. No folks with an ongoing war effort against terrorism our federal treasury deficit is also growing by the day. The light of these facts, where is the money to build the extension of Corridor 18 through Indiana going to come from? INDOT Commissioner Nicol would like us to believe that Federal Highway Administration through the US Department of Transportation has funded an 80 percent I-69 pot of gold but is just waiting until we can make up our mind on a route. Whoa not so fast, virtually all the federal funds refer to in that 80 percent will come from Indiana's federal TEA 21 annual gas tax distribution money that can and should be spent on other more worth while and necessary improvements. That tax should get the attention of City Government leaders from all over this State, it seems that since INDOT is inviting public comment and you work for us than it follows let the selection of alternative views in this decision should be democratic not autocratic and that you need to think with your heart as well as your head and treat the money like it was you own instead of fast tracking this project to be INDOT's weakest link and bringing home the bacon. Thank you. 3.4.6

0819-075 Braun, John.wpd

Michael Grovak, Project Manager
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, IN 47715

Mr. Grovak:

I am writing to give my personal input regarding the Draft Environmental Impact Statement (DEIS) for the I-69, Evansville to Indianapolis Study. I appreciate your time and the time of your staff to include this information in study as you have stated you would.

I will address a number of the points that have been raised both for and against the study and the Indiana portion of the highway project.

The Environment
While the DIES does look at the impact of the various routes on farmland, forestland, wetlands, endangered species and sensitive karst topography, it does not adequately address the change in noise, air and water quality along each route. It disturbs me that an "environmental impact study" could be called complete without considering the effect of noise pollution on human and non-human residents, the contamination of local well water by highway runoff and the far-reaching impact of increased levels of vehicular exhaust.

Communities along the proposed corridors do not need to end up like Indianapolis, the "Crossroads of America", which was recently rated the 8th worst in the country for cases of asthma (http://www.wishtv.com/Global/story.asp?S=995381&nav=0RaAC8Rc). Researcher Bert Sperling's www.bestplaces.net shows Indianapolis with an air quality rating of 9 (with 100 being the best) compared to Bloomington's 50. Indianapolis's watershed quality rates 1 (with 100 being the best) compared to Bloomington's 27. While Bloomington's numbers could certainly be better, ongoing efforts to improve them will be severely hindered by the introduction of an interstate and its accompanying traffic, smog, run off and collateral sprawl. A study recently released by the Center for Urban Policy and the Environment at IUPUI states that Indianapolis-Anderson-Muncie could become one interconnected urban corridor in 40 years. Putting I-69 through the heart of Indiana will accelerate that type of destructive development to the south of Indianapolis as well.

The Economics
Many have pointed out the folly of choosing a route that is 65% more expensive during a time of massive state budget deficits. Gas taxes were raised to cover other budget difficulties. 100% of the funding for I-69, whether directly from the state or from the reallocation of our federal gas tax dollars, will come from the pockets of Indiana drivers. This makes this a statewide issue, not just one of regional concern. Are we to raise the gas tax again, as supporters such as Bloomington's *Herald Times* suggests, to cover the needs of existing roads after I-69 has siphoned away the majority of existing road funds? If anything begs for a statewide referendum, this does. 3.4.6

1107-689

Supporters of new terrain routes for I-69 paint a dismal picture for the economic health of the southwestern part of Indiana. In fact, the region's economic picture does have areas that are suffering as well as areas that are doing well. When compared equitably with other rural areas of the state, there is little or no difference between this region and others. Many of those other regions that are in tough economic times sit in close proximity to interstate highways.

These same new terrain proponents would have you believe that it would be a silver bullet for job creation and economic prosperity. Let's take a look at their assumptions. A new interstate connecting Indianapolis and Evansville will bring 10,000 trucks a day through the region. Businesses and heavy industry will want to locate along this new corridor because it is 10-20 miles shorter than the existing routes, saving, as one pro I-69 group estimated, "8 million driver-miles" per year. In addition to the trucks will come the passenger vehicles requiring, as the truckers would, restaurants, gas stations, motels, etc. The consequence of this opening of the transportation flood gates would be massive job creation in the region. Let's leave aside for a moment the discussion of the quality of the jobs that would be created. This rosy scenario presupposes that this traffic is not currently flowing from Indianapolis to Evansville when, in fact, it is. Most of this traffic is currently running along the existing best route, I-70/US 41 or study Alternative 1. If the floodgates, as it were, were redirected through the central part of the state, the business, jobs and lives currently supported by that traffic and trade would be acutely affected by the lost revenues. This would be a job relocation project, not a job creation project. To consider this highway as a job creation tool would make the cost per job created by this project approximately 50 times higher than traditional job creation efforts (based on 1999 University of Illinois study). Studies show that physical infrastructure such as roads and sewers are not what attract quality jobs. Businesses are drawn by "the three T's": training, technology and tolerance. Money is better spent on educating your workforce and providing good access to technology.

Let's stop for a moment to consider the economics of the proposed "8 million driver-miles" to be saved each year by a more direct new terrain highway over the existing Alternative 1. If we gave a generous $1.00/mile for fuel, vehicle wear, value of personal time, etc., this would lead us to believe that this road will save us $8 million per year. The generally agreed-upon average cost differential between the new terrain routes and Alternative 1 is $600 million dollars. (This significant sum does not include the amount that is already budgeted for resurfacing I-70 from Indianapolis to Terre Haute and should, by all accounting, be added to that differential.) This means that it would take 75 years to realize these savings. It would be a stretch to propose that rate of savings would continue over that many years. Based on the evolution of transportation, I would contend that it is unlikely that road will even be used in the same way in75 years time.

Crane Naval Center
Crane Naval Center is a major employer in south-central Indiana. No one disputes that. It is possible that Crane will be shut down in the next round of base closures. No one disputes that. What is in dispute is whether having direct interstate highway access will

save Crane. Having good interstate access did not save Fort Benjamin Harrison. Why should it save Crane? In fact, Crane was built in a remote location on purpose. It was seen as a strategic advantage to be difficult for our enemies to reach the base. Building a highway to its front door under the current state of national insecurity and terrorism threat would increase its vulnerability.

Safety

Improved safety has been raised as a motivation for upgrading the roads in southwest Indiana. Four lane roads are safer than two lane roads? Probably. Interstates are safer than limited-access highways? Possibly. Traffic and traffic speeds are significantly higher on interstates? Definitely. Comparing numbers of road deaths on different types of road does not give a complete picture of the safety issues. Cutting communities in half and forcing emergency vehicles to travel farther to reach their destinations will also impact safety. Forcing school buses to travel farther and use interstates will impact safety. Bringing more interstate traffic into areas previously visited by mostly local traffic will increase crime and drug trafficking. Using state road funds to fix local roads, increase access and promote safety would have a much greater impact with broader and more immediate effect.

Conclusions

One does not need to look too far beyond the slogans and catch phrases of the proponents of a new terrain route for I-69 to determine what is really driving the decision making. Facts, economic reason and environmental sensitivity have fallen under the weight of the power of political contribution. Construction companies, developers, land speculators and consultants such as your firm, BLA, have shaped the argument from the start. They have helped INDOT structure its Purpose and Need Statement to ensure the selection of their preordained route. If this was meant to be a real study of alternatives, a real discussion, then why would so much of Hoosiers' money have been spent on professional lobbyists, legal and marketing firms to ensure the victory of a new terrain route? Why would your firm, whose first EIS was thrown out by the courts, have been given the contract to do it a second time?

At times during the debate supporters of a new terrain link have shown what is really important to them – convenience. They are galled by the 12 stoplights along highway 37. Morton Marcus, Director of the Indiana Business Research Center, stated during the annual tour of the Business Outlook Panel of the Indiana University Kelley School of Business that the new terrain I-69 would happen "because no one wants to spend 10 more minutes in Martinsville". INDOT Commissioner Bryan Nicol was introduced to the Bloomington Rotary club as the man "who would take 20 minutes off the drive to Evansville". Convenience sure, but at what cost?

The Bloomington Herald Times, ardent supporters of a new terrain route through Bloomington, stated that concerned citizens could control the pressure of sprawl brought on by the highway through "vigilance and public commitment" to careful zoning (*HT 8/15/02*). This vigilance and public commitment has been expressed for years. We have diligently expressed our desire not to allow the highway to waste our money, destroy a significant portion of the natural beauty of our state and spoil the unique character of our community which serves as its greatest competitive economic advantage. Unfortunately it seems that our voices have not and will not be taken into consideration. You and Commissioner Nicol have stated publicly that while our comments will be included in the study, they will not be given the weight of a vote on the issue. I can understand that it would be difficult to tally up since multiple comments can be submitted by any individual. An issue of this fiscal weight and irreparable environmental and cultural significance should be put to the vote of the people of the entire state, not just those who have contributed the most money.

I am skeptical whether you will take the time to listen to my views. Over the past several years, it has seemed to me, that you, INDOT and the Governor have not heard my voice or the voice of thousands upon thousands of other Hoosiers. I can only hope that you will start now. Please choose the common sense alternative to a new terrain route. If the I-69 extension must be built, please use the existing I-70/US41

Sincerely yours,

Robert E. Flynn

Robert E. Flynn
1917 Arden Drive
Bloomington, IN 47401-6730
reflynn@indiana.edu

Cc: Governor Frank O'Bannon
INDOT Commissioner Bryan Nicol

From: Robinson, Larry [mailto:lrobins@indiana.edu]
Sent: Thursday, November 07, 2002 1:58 PM
To: CPARRISH@indot.state.in.us
Subject: RE: I-69 comment

It was your site that said this.

I just got a letter from Harmony Otahal saying that it was back up.

Do I need to resubmit the comments I made (in the letter you got) on the failed page, or will you forward them?

Larry Robinson S/AP/EIS lrobins@indiana.edu
Indiana University (812) 855-5073 Room 42
Kinesiology Dept http://php.indiana.edu/~lrobins
1025 E 7th St Rm 112 I voted for gridlock.
Bloomington IN 47405-7109

----Original Message----
From: CPARRISH@indot.state.in.us [mailto:CPARRISH@indot.state.in.us]
Sent: Thursday, November 07, 2002 10:04 AM
To: Robinson, Larry
Subject: RE: I-69 comment

Good morning,
Does it say that indot@ai.org is the site that states the comment period is over.

We are taking comments until midnight today. Please respond to me and let me know. Thanks, Charlene

Charlene Parrish
Coorespondence Coordinator
Indiana Department of Transportation
100 N. Senate Avenue
Room N755
Indianapolis, Indiana 46204
(317) 232-5117
cparrish@indot.state.in.us

----Original Message----
From: Robinson, Larry [mailto:lrobins@indiana.edu]
Sent: Thursday, November 07, 2002 9:53 AM
To: indot@ai.org
Subject: I-69 comment
This is supposed to be the last day for comment on I-69, but your site says the comment period is already over and won't take an email.

The link for complaining about faults in the website is not found.

About I-69 Most of the county officials who passed that resolution requesting that I-69 not pass through Monroe County were DEFEATED in the election. So the resolution is moot.

Why doesn't the cost report for option 1 include added travel lanes on I-70? 3.4.6

I wrote earlier preferring option 3B. Now that I know it will tear down 3 churches, I am no longer for that option unless the location of I-69 is moved so it does not disrupt Frow Road properties. Why not bring it in where 46 crosses 37? Otherwise, I prefer options 3A, 3C, 4A, and 4B.

Larry Robinson S/AP/EIS lrobins@indiana.edu
Indiana University (812) 855-5073 Room 42
Kinesiology Dept http://php.indiana.edu/~lrobins
1025 E 7th St Rm 112 HDTV and taxes killed RCA.
Bloomington IN 47405-7109

1107-066 Robinson, Larry.wpd

Let our elected officials know what you think about the I-69 extension and the possibility it will go through our area.

NAME: Marita C. Keith
ADDRESS: 7852 Ballwood DR
Indpls., Ind. 46226 (Marion Co.)

DATE: 9-18-02

I am FOR _____ AGAINST ✓ extending I-69 from Indianapolis to Evansville.

I think that nearly $ 2 billion SHOULD _____ SHOULD NOT ✓ be diverted from rebuilding and maintaining other Indiana highways and bridges ~~so that a new route for I-69 can be built~~.

I ~~live close to and~~ am most familiar with the Hwy 70 & 41 area + ~~where the six proposed route segment~~. 3750, 4058 to 231-to 64 west.

I think it would be GOOD _____ BAD ✓ for I-69 ~~to go through this area~~ because: of —

1. Cost
2. Disruption of too much farm Land,
3. More maintance,
4. more State Troopers.
5. Really Not Needed - AS NO emergencies exist.

3.4.6

I think that (check all that apply): GOVERNOR O'BANNON ✓
LT. GOVERNOR KERNAN _____ MAYOR PETERSON ✓ and/or the INDIANAPOLIS / MARION COUNTY CITY-COUNTY COUNCIL ✓ should adopt a public position IN FAVOR OF _____ OPPOSED TO ✓ the extension of I-69 through our community.

0923-004

PUBLIC HEARING COMMENTS

David Matthews... I'm a real estate appraiser working in southwestern Indiana. For the past 30 years I've consulted on Highway right-of-way lines in several states. First of all I want to thank INDOT and everyone who is associated with the fair and thorough analysis of the writing for I-69, you've done a good job, slow and good. The only major mistake is not including substantial cause to upgrade I-70 with that alternative. This confused a lot of people about that cause we're not dealing with apples and apples. I-70 will probably not be widening that (inaudible) a direct I-69 (inaudible). So if you compare (inaudible) the original cost among the various cost of the routes. Cost is not the issue anyway. Federal tax dollars are coming to pay for this through your gasoline taxes. It's going to be income tax on your personal, your property taxes is going to pay for this. Usually new terrain route allows alignment for this many homes, businesses, churches, cemeteries that exist in areas that do not need widening existing highways such as 41, 70. Widening the existing highway (inaudible). I support the shortest and most direct route between Indiana's first and third largest cities. And the bid is made by some other residents by other cities who already have their fast and convenient direct to Indianapolis, if we can get Evansville a direct route to the States Capital. Southwestern Indiana far from the serve of interstate highways compared to the rest of the state. It's liable to cost over a billion of dollars no matter which route you choose, let's make sure to choice the route that generates the greatest return in economic benefit that help Indiana most direct route does it's best. Is now fast and safer to travel by car or truck in Louisville, Nashville and St. Louis and Indianapolis. Indianapolis looses because it isn't (inaudible) to Indianapolis, Evansville looses and so does Indianapolis, the whole state through loss of business, tax dollars and jobs to those surrounding cities (inaudible). The direct route will also benefit and we took three serious injuries every day. Which is an amazing statistic I had no idea. The people of southwestern Indiana (time ran out). 3.4.6

0821-254 Matthews, David.wpd

PUBLIC HEARING COMMENTS

Sarah Clevenger... What I first read about the alternative and the ratings for them, I thought well they're listening to talk, money talks, not the people that talk. Then I began to wonder where did the money come from and in who it was going to. Another thing that I thought about was Bloomington has had two ecological situations and some tree sitters. If the new highway goes through, what's going to happen as far as all these incidents are concerned. And I was hoping that nobody would be killed, what about the extra cost it would be to guard all this equipment so it couldn't be firebombed..... I suggest it be taken under consideration. And I picked up Time Magazine today and the cover said "Let's make this a green century" so let's do it, make it a green century. 3.4.6

0820-104 Clevenger, Sara.wpd

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW. USE THE REVERSE SIDE, IF NECESSARY.

We strongly object to any new terrain highway or any new terrain I69 alternative. All new terrain alternatives cause unnecessary and unacceptable environmental damage, as well as unacceptable (& irreplaceable) loss of essential farmland and natural resources.

We note, in addition, that what should be a balanced cost-benefit analysis is very biased, focusing on economic benefits for the few. The analysis does not incorporate both real and more-difficult-to-quantify costs to the people of southwestern Indiana. Where is the analysis of the adverse economic impacts of the environmental damage that will be caused by any new terrain alternative. Water quality declines and air quality declines will have both direct and indirect adverse economic impacts, as will the loss of natural resources and farmlands. Indirect impacts being ignored include the health impacts - increases in asthma from the increased PM10/PM2.5 generated by the highway is only one example of

(continue on other side)

0820-227

(continued from other side)

such ignored costs. Where in this study are the economic costs to the healthcare system from the increased air and water pollution? Where in this study are the economic costs to each local rural economy from the need to put people on centralized water systems because their well water is unacceptably contaminated. And, based on comments made tonight, INDOT would be well advised to add to the building costs the increased security that will no doubt be needed if they try to build a new terrain route. 5.5 5.5 5.6 3.4

All new terrain routes cost millions of dollars more than Alternative 1 or leaving the highway system as it is. These millions of dollars would be better spent on improving the roads we have, or, even better, improving our kids' education. Furthermore, why spend millions and millions of dollars (especially when state funds are short) just to save 20 minutes off a 4 hour trip. What a phenomenal waste of money for such a poor return on your investment.

Name: Diane Henshel & Artemis Walden

Address: 4121 Cadbury Court

City/State/Zip: Bloomington IN 47401

We politely request that I69 be put to a state-wide referendum before any more public funds are used for this pork barrel project!

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

RECEIVED
OCT 28 2002
BLA

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

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PLEASE ENTER YOUR COMMENTS BELOW.

I Do not WANT A NEW-TERRAIN I-69.
US 41/I-70 Is the common SENSE alternative —
It SAVES hundreds of millions of our scarce Transportation tax dollars. It preserves thousand of acres of farmland and forest that a NEW-terrain highway would destroy —
We cannot afford a new terrain I-69. INDIANA is in a budget crisis. Gasoline taxes have been raised this year to address what is already a shortfall in funds to maintain Indiana roads. INDOT's preferred routes for I-69 are on average about $600 million, or 65% more expensive to construct than US 41/I-70 and eight time more expensive to maintain every year. 3.4.6
I-69 will divide communities, farms will be split and local roads will be cut off, slowing emergency vehicle response time and lengthening school bus travel times.
INDIANA has lost over one million acres of farmland SINCE 1990. A NEW-terrain I-69 will divide my Farm, I WANT to Farm —
I Do NOT WANT A NEW-TERRAIN I-69!

1028-047

Name Vincent Georges

Address RR#2 Box 147

City/State/Zip Fort Branch, IN 47648

From: "RHenry@terrehautechamber.com" <rhenry@terrehautechamber.com>
To: "Vincent Bernardin" <vbernardin@blainc.com>
Subject: I-69 Additional Comments
Date: Thu, 24 Oct 2002 07:36:29 -0500
MIME-Version: 1.0
Content-Type: multipart/alternative;
boundary="----=_NextPart_000_0735_01C27B30.10EE6220"
X-Priority: 3
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook Express 6.00.2600.0000
X-MimeOLE: Produced By Microsoft MimeOLE V6.00.2600.0000
X-Virus-Scanned-By: CleanMail v2.0

Vince, again I ask that this report be forwarded to Mike.

On page S-19, we note that "preferred" route 4B costs are averaged at $1,080,000,000 [$150 million more than alternative 1] and that "preferred" route 4C costs are averaged at $1,420,000,000 [$490,000,000 more than Alternative 1].

The DEIS reports the following on impact miles:

Alternative 1		87 to 89	[$10,449,500 per mile]
Alt.	4B	141-143	[$7,552,450 per mile]
Alt.	4C	141-144	[$9,860,000 per mile].

3.4.6

We question the numbers you have estimated for alternatives 4B and 4C.

When you look at the other "preferred" routes, the cost per mile ranges from $10,952,380 [2C] to $12,167,830 [3B].

We find it hard to believe the DEIS estimates as outlined on page S-19 and suggest this is but another glaring mistake in the Draft Environmental Impact Statement.

The bottom line question, how can 4B/4C costs be estimated so low when their impact mileage is equal to the other "preferred" route alternatives

We suspect the numbers are "cooked" to provide an attractive alternative to the original hopes of having 3B or 3C selected as the route. Needless to say, after 4B or 4C is selected, the error will be noticed but then it will be too late to do anything about it. 3.4.6

G. Roderick Henry, CCE
President
Greater Terre Haute Chamber of Commerce

1024-031 Henry, Rod.wpd

Dear Mr. Grovak,

I would like to voice my opposition to a new terrain route. I have looked at the DEIS maps and have a couple of concerns I would like to share with you. First of all, I notice you have missed three cemeteries in the area by Carp, (Owen county) Indiana. The first cemetery is in Montgomery township, NE, section 21 the southeast corner. It has about 15 stones, one of which is new. The second cemetery is less than 1/4 mile away in Montgomery township, section 28 on property listed in the plat book as belonging to Robert Rupp, Jr. It too has numerous stones. The third cemetery is also in Montgomery township, section 28, and is a family cemetery on property listed in the plat book belonging to Donald and Janet Hoffman. (My plat book may be out of date so the owner's names might not be correct, but I can assure you the gravestones are there.) All three of these cemeteries are in the area where you are planning to put a proposed underpass or overpass, and they may be in the way of the proposed cloverleaf, depending on its size. 4.3.6

Secondly, I looked at the wetlands in the area from Freedom to Spencer. I found 28 areas that the US Fish and Wildlife maps had listed as wetlands, but your maps had only listed them as lakes, ponds or floodplains. Does this mean that you don't consider these spots as wetlands? Will they be among the items you will be obligated to replace at a 3 to 1 ratio? I hope so. 4.2.5

Thirdly, on Hyden Road just west of Spencer (from your proposed underpass on Hyden to 330 west and up around the corner to Hancock School Road), I found at least 35 homes missing (and I'm rounding down). I realize you have a disclaimer that some of the homes may be missing due to new construction. However, 35 missing homes in a square mile area is a pretty large number, and many of these homes were not new by any means. I might add that from what I've seen and heard, this is not an isolated incident (at least in Owen county). It makes me question the overall accuracy of the study as well as the accuracy of the budgeting that will result from this information. 6.1

Additionally, I would like to say that I see no information on possible damage to the groundwater in the area. We have no access to a public water supply outside the town of Spencer. If these wells are damaged, what will happen to all these people? --cisterns for all 2500+ of us? At my house we already conserve water and do only one load of laundry a day because of the drought and the fear of being without water. I almost can't believe you would put together a study without making this issue a central concern. This is a serious oversight.

Yours Truly,
Barbara Stewart

1107-690

Subj: DEIS comments
Date: 11/7/02 11:42:29 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = ian
LastName = hall
StreetAddress = 4617 nestle down drive
Address =
City = bloomington
State = IN
ZipCode = 47404
Email = ihall@sicumc.org
Comments = After reviewing I-69 alternative route number three I would like to make the following comments.

The topographical map of proposed route number three shown on page 26 of the environmental impact study would go straight through a new subdivision which was not present at the time the map was produced. The subdivision is call "Union Valley Farms", at present there are only a dozen home within the subdivision, however there are plans for up to seventy homes in the near future. 4.1

As a new homeowner within this subdivision the proposed route number three deeply concerns me. The route would not only impact the farm land surrounding my home but would more then likely necessitate the demolition of my new home. As the environmental impact study map is obviously out of date I thought it prudent to make the existence of the subdivision known.

Sincerely,

Ian J. Hall

1107-332 Hall, Ian.wpd

Subj: New I-69 Study Form Feedback
Date: 10/24/02 10:38:32 PM EST
From: dinman@ccrtc.com
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

, IN

Message:
I believe all the citizens of Indiana would be best served by using the I-70/41 route for a road to Evansville. At the meetings the aerial photographs omitted many of the new homes located in Monroe County. It seems obvious that up-to-date photos have not been taken. Therefore the cost could not be accurate. My son and family have just built a new home around the Monroe Greene County line. I am very familiar with that area of the state. With the economic condition of Indiana I hope that the state will reconsider the before choosing Bloomington as the choice. I hope that the officials making the decision will drive through the country in Monroe and Greene County to see what they would actually be destroying. Thank you
Sandra Inman
8826 S. State Road 59
Clay City IN 47841

4.1

1024-029 Inman, Sandra.wpd

November 5, 2002
Michael Grovak
Bernardin, Lochmueller, and Associates
6200 Vogel Rd
Evansville, IN 47715

Dear Sir,

Following are comments to the DEIS issued for the proposed routes for I-69 in Indiana.

The ability of average citizens to comment on a document the length and complexity of this DEIS in 90 days is extremely limited. In Owen county the only two copies of the DEIS available to the public were located in the Library which is open for only very limited hours outside of the typical work day and the offices of the local paper the "Evening World" which was only open during regular business hours. In addition, only one copy was available at each location, allowing only one person to use the document at any given time. The limited distribution and time allowed for comments is clear evidence that INDOT and Bernardin, Lochmueller and Associates (BLA) do not want an open, honest, informed debate about this study.

Despite these obstacles, many errors were discovered in the study that need to be addressed. The estimated number of houses impacted by I-69 in Owen County is suspect. On page 14 of 29 on route 2 in Owen county you indicate there are a total of 29 houses from the proposed overpass on Hyden Rd. to and including Hancock School Rd. within the study area. In fact you missed over 35 houses on these roads. Owen County is a rapidly growing area and a few of these houses have been built recently, but the great majority were simply omitted.
On Goose Creek Rd. you missed 2 houses in a ½ mile stretch beginning at State Rd. 67, both of which have existed for over 5 years. You identified only 5 houses in this area. Given such huge discrepancies between your maps and reality, your estimates of the number of homes effected, and costs involved in acquiring property cannot be taken seriously.

4.1

Discovery of the errors took only a few hours looking at the maps and driving the roads to confirm the exact number of homes. It is difficult to imagine INDOT spending over $9 million on a study and not being able to get such simple facts correct. The residents of Indiana stand ready to assist INDOT and BLA is securing accurate information so estimates that have some chance of reflecting reality can be obtained and we urge INDOT and BLA to accept our offer of help prior to making any final decision about if and where this project should be built. It is unfortunate that this process has been so lacking in public input. Rather than presenting these maps to residents in the effected counties to get their help, INDOT and BLA relied on secrecy to develop a study that supports preordained conclusions.

Wetlands is another area of concern. Using Fish and Wildlife maps easily obtained from their website it was a simple matter of identifying 28 areas identified as wetlands in the

4.2.5

study area from Spencer to Freedom in Owen County. While these areas appear on the DEIS maps, they are all misidentified as either lakes, ponds, or floodplain. Again, this is an example of readily available information that would enable INDOT and BLA to create a more accurate study that was missing. 4.2.5

The lack of karst area detail is astounding. In the study area from Goose Creek Road in Owen county to North of the town of Spencer there are springs, caves and sinkholes in the study area too numerous to count, yet only isolated areas are indicated as Karst terrain. The only conclusion that can be reached is that neither INDOT or BLA desired to have an accurate accounting of this feature. Again, the residents of this area stand ready to assist in identifying these features if INDOT and BLA wish to have accurate information included in the study. 5.24

The impact of this decision is enormous for those of us who live and work in the targeted counties. It is our expectation that any decision reached be based on accurate, unbiased information. The errors found in a very limited time, by average citizens indicate that this study lacks all validity. It is unacceptable and must be corrected prior to any decision being reached.

Bruce McCallister
Rt. 1 Box 1075
Freedom, In. 47431

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

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PLEASE ENTER YOUR COMMENTS BELOW. USE THE REVERSE SIDE, IF NECESSARY.

I live on 300 S close to Old Cliffy Church - Jackson Township. Our home, and my two neighbor homes are not on your DEIS aerial maps. You just took pictures and used out-dated plat books to make homes. I do not trust your study - your details are flawed. 4.1

I would like to know the public comments for this highway. It seems to me that people are against the new terrain highway - Why do we still look at this?

Please, please consider the I 70 and 41 alternative.

Kenda Jochim
R.R. 3 Box 298
Bloomfield, IN 47424

(continue on other side)

Subj: DEIS Comments
Date: 10/29/02 9:25:20 PM EST
From: ozform@networkwes.com
To: mgrovak@aol.com

Name = Jerry A. Dittmer
Address = 73 N. Letterman Road
City = Paragon
State = IN
ZIP = 46166
Email = jaditt@metinc.net
Message = Dear Sir/Madame:

How is it that a series of tornadoes recently in Martinsville and elsewhere in this corridor that leveled homes, destroyed acres of crops, destryed timber, and casued temporary environmental destruction was considered a "disaster" eligible for Federal funds.....yet a proposed interstate route that would destroy many more homes, destroy many more crops, cropl and timber land, and alter the very geology of it's path, causing irreversible environmentnal impacts.....be considered a boon to the residents of Indiana?

I am opposed to any route for the construction of I-69 for many, many reasons- cost, irreversible environmental destruction, loss of future sensible development, and change in character of the region in which I live. However, if a route must be developed, then the I-70 to 41 route should be the only reasonable route, as it is the least expensive and the least environmentally damaging. I have been opposed to the project ever since first hearing of this debacle- I sent an E-mail tothe governor a couple of years ago stating my opposition when I lived in Indianapolis. I moved from Indianapolis by the way, due to the sprawl, pollution, and poor quality of life. Now, by irony,I find myslef in the direct path of Alternate 3 on Page 27 of 32 of the study. I understand the need for government actions that are in the common interest of the people- but I have seen nothing in the studies that suggest a quality of life benefit for the people in Morgan County or the State that shows another concrete path to sprawl will benefit Indiana in the long term. It is short sighted to not consider the value of greenspace and rural lands as an intrinsic value and a future commodity to protect.

Is it any wonder why we can't attract good jobs and keep our highly educated college grads- why locate a business or live in a State that places no value on the natural resources of our State? Aside from this, I have the following specific comments on the EIS study and request that each be addressed thoroughly:

1) No information regarding the unique artesian springs found in Alternate 3 in Morgan County were documented or addressed. Martinsville High School even has an athletic team called the "arties" for artesian springs- why weren't these considered as important natural features fairly unique in Indiana? 5.24

2) Bald Eagles do in fact nest in the Morgan County area on the White River, as supported by the IDNR- you list it as only "may be present"- what effect would a drasticly increased human encroachment and automobile activity in the immediate vicinity of nesting habitat and brood rearing success? 5.17

3) How would the stream quality of Fall Creek on ALternate 3, Page 27 of 32 as well as the White River downstream be protected in order to comply with the narrative water quality criteria and fully support designated uses during and after construction? See 327 IAC 2-1-6. It appears the entire streambed would be disrupted in places and surface water flow patterns would be changed and require monumental management of stream and wet weather surface runoff flows toprevent localized flooding/impairment of waters. 5.24

4) The Paragon area has been utilized for years as a stopover spot for the reintroduction of Whooping Cranes due to the fertile farm fields and rural setting. They have already led the cranes through this area this year- why was this important migratory stopover of a federally endangered species not mentioned? This is widely advertised information in IDNR newsletters? Wouldn't an interstate and increased human activity adversely affect Paragon as a stopover spot for the cranes? 5.17

5) Why was there no mention of the state threatened reptiles favoring the rocky outcroppings of this area?

6) Why was the relative fertility of the farmland in this region not compared to other lands of lesser fertility when utilizing the cost comparisions? 5.20

7) Please provide specific detalis on how each value was derived in the development of the study, such as source used for threatened/ endangered species location/distribution and when data was from; how was data gathered to generate the geologic information in the EIS ; how was the information regarding the hydrogeologic information obtained; what sources were utilized to delineate the specific Karst areas; etc. This same information and data should be presented for every factor considered as it is a matter of public record as it served as the basis for the conclusions reached in the study! It is not enogh to provide conclusory statements without the data to support it or even the age of the data utilized documented- for all the public knows an intern decided to use the GIS tools to arbitrarily list such features. 4.1

8) What factors were utilized to determine what items would be included in the Comments portion of the route maps? What logic was used to list the "Interest" items? What method was used to determine what held interest? Listing "multiple sources" is simply not appropriate- a bibliography of sorts should be included.

9) Why weren't the recreational opportunities that would be lost accounted for in the study- public access sites should have been identified, as well as local useage for community fishing areas. No accoutning of the value lost from waterfowl/der turkey/ruffed grouse/ quail/ rabbit/ furbearers,etc- this is an environmental impact on game populations and on human enjoyment of natural reources, as well as a draw of tourism dollars to this area. 8.2

10) Grooundwater depth in the area is often shallow- was this considered as an environmental issue?

11) There should be an acounting of the expected increase in pollutant loads to the White River, Fall Creek and other tributaries in regards to the increased emissions of vehicle exhaust from the increased vehicle traffic in the area. This could contribute to use impariment of the Whote River and Fall Creek with regards to mercury and other metals- air quality in the region should also be documented based on human health impacts and assessed for potential adverse effect due to increased traffic. 5.24

12) The Hills and valleys in this regiosn conduct sounds more readily than a flat region- what about the potential for noise pollution/nuisance conditions for all the routes?
Will INDOT place acoustic barries along the interstate to buffer the sound- wait I already know the answer to that one....NO

These are just a handful of questions, and there are countless others.

I have no false ideas about how much weight a handful of people in a tiny town like Paragon have- we are to you just ignorant hillbillies that I am sure you enjoy mocking, probably reading your favorite comment letters aloud to each other as you sit in your little fabric cubicle boxes. Guess what, we laugh at you too for being puppets on a string. We know that the public input process is a joke and the decision will amount to whatever route the Governor wants it to be- all that will change will be the sales pitch to the people who's lives it will change- I write more out of sadness adnd of anger than out of expectation. The EIS study is shortchanging us, the public has a right to know exactly how these impacts were determined and all data should be disclosed. It should also be thorough enough to make intelligent decisions.
(Small wonder why Illinois passsed on I-69....)
I cry already for the tragedy that will be I-69 wherever and whenever it is routed. It reminds me of the old 1970s commercial of the American Indian on his horse crying at the site of all the littering and pollution occurring all around him, knowing he is powerless to stop it.

So, with the only voice I have, I stand opposed to all routes, as all are unnecessary, costly, and environmentally devastating. If a route is pursued,then I-70 to 41 makes the most sense- if sense can be made of this at all.

Jerry A. Dittmer
Paragon, IN

1029-031 Dittmer, Jerry.wpd

November 2, 2002
Tyler G. Spatta NSS # 50826
Spencer, IN 47460

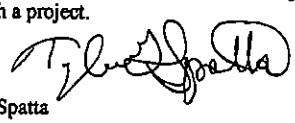
I am a member of the National Speleological Society. I was asked by a local organization to look over the Environmental Impact Studies put together by Bernardin-Lochmueller & Associates to check for accuracy. My conclusion is the study comes up very short of the truth.

It is my understanding that these maps came from the Indiana Geological Survey. The co-author of the maps showed me a copy of the original maps. He stated that these maps were not intended to be used in such a manner. The maps from the IGS claim they are inconclusive and need further study. Further study was not done by Bernardin-Lochmueller & Associates. Even though the EIS studies state that the study maps do not show everything, it is not understandable how these large areas have not been marked. This is a clear case of ignoring the truth to help someone's cause. Does the planning committee realize that caves and springs are the way the land drains of water? Swallows cannot be filled and built over without repercussions. In my opinion, it would be very important to understand the geology of the land before constructing a major roadway. 4.2.7

The two map sections I studied mark less than 1/4 of the karsted land that is known to be present in these areas. This is a problem. Page 15 of alternative 4 fails to show that all the Texas Pike Basin drains underneath the proposed route to come out of Shiverly Springs. This is thought to be Owen County's largest spring. This means that there is a major passage, possibly one of the largest in the county. The majority of people in this area get their drinking water from a well. Because most the water in this area is groundwater, the runoff from this highway would effect the potable water used to live by this community. Furthermore, the sink and swallow holes of the vicinity would not be feasible to pave without eventual collapse. 5.24

Page 14 of Alternative 4 is grossly inaccurate. It looks more like features are trying to be hidden than exposed in an informative manner. Anyone doing research of the area could easily find archived grotto newsletters that point to caves, springs and possible endangered blind cave fish. Two of the caves that the fish were once spotted will be paved. One very small area on this map is shown to be karst, where in fact more than 1/2 the page should be marked that way. Ironically, this is the area that the proposed highway runs through. More study of this specific area needs to be done. The Indiana Geological Survey does not even mark the couple of springs that they have on file correctly. Blindfish Springs Cave is one of them. It is thought after a rain to release more than1/5 of all the water that makes up Rattlesnake Creek. This is right before the creek dumps into the White River. The cave is suspected to be only an overflow for the spring that the county has partially filled to make a road. This passage is critical for this area's drainage. 5.24

For the safety of our citizens, and the conservation of our land, these areas need a better study done before construction of a highway takes place. This land is not suitable for such a project.



Ty Spatta

R+.2 Box 719

SPENCER, IN. 47460

1102-016

Subj: DEIS comments
Date: 11/8/02 0:02:30 AM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Abigail
LastName = Pietsch
StreetAddress = RR4 Box441W
Address =
City = Bloomfield
State = IN
ZipCode = 47424
Email = abbypeach@yahoo.com
Comments = I69 Public Hearings
Draft Environmental
Impact Statement
Comments
November 7, 2002

Abigail L. Pietsch
RR4 Box441W
Bloomfield, IN 47424

Dear Committee:

The proposed i69 Alternate Route 3C runs through Center Township in Eastern Greene County (Map 14 of 32 of your study). This will terminate and occupy a private one half mile access road called Whippoorwill Lane, intersecting Greene County Road 35N, labeled Carmichael Road on the map. It is the only ingress / egress to 15 plus subdivided residential properties. Many residents will loose their homes to this path of i69. A local Cemetery would also be destroyed. 4.3.6

I own and live on twenty acres at the dead end of Whippoorwill Lane. This land contains are flood plains, a spring fed creek and a large assortment of mature hardwoods. These woods are full of Hickory trees. Bats often visit these trees from a cave in my neighbors field. They are believed to be The Indiana Bat and an attempt to document this is scheduled for the Spring 2003.

I reject your proposed i69 Alternate 3C. I further reject your studies to build through other Indiana terrain.

President Bush is now calling for more use of renewable fuels. This means Indiana corn.
It does not grow in concrete.

Thank you.

Sincerely,

Abigail L. Pietsch

1107-342 Pietsch, Abigail.wpd

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

Thank you so much for the opportunity to express my concerns about the I-69 project.

The enclosed papers are very important.

RECEIVED
NOV – 4 2002
SLA

1029-041

Name Mrs. Lorraine E. Sirucek

Address 1207 Hearthstone Ct

City/State/Zip Bloomington IN 47401

Lorraine Sirucek
1207 Hearthstone Ct.
Bloomington, IN 47401

October 29, 2002

Michael Grovak, Project Manager
Bernardin, Lochmueller & Associates

I am writing to express my concern about the proposed extension of I69 from Indianapolis to Evansville. I am very apposed to this highway and one particular corridor. I own 420 acres of farmland and woodlands in Green County, which must be taken into consideration for historical and environmental reasons. One very important parcel is the Storm Cemetery with veterans from the Revolutionary War, The War of 1812; the Mexican War and The Civil War. A ceremony to honor the veterans was held in 1994. I'm enclosing copies. Another important item is the Sexton Spring Cave. Every 2 years the Dept. of Natural Resources notifies me of their project in January or February to enter the cave to study the Indiana Brown bat population. See the enclosed letter. Your dept. must be aware of the joining of Indian Creek and Little Indian Creek on my property. The cave has water running from it to Indian Creek all year long. At one time the DNR put dye in a sinkhole near Airport Road and Highway 45. It came out of our cave miles away. The Geology Dept. at IU informed us that our cave carst is the same that runs all the way down to Mammoth Cave in Kentucky. 4.3.6 5.17

In the past I have sold lumber to oak and walnut veneer companies and am a member of the Woodland Stewarts Institute. Our farm crops are always a very good yield and quality with the moisture guaranteed from the creeks.

The three counties, Green, Monroe and Lawrence meet at one corner of my farm, which has one mile of road frontage on Rockeast Road.

This highway project as currently proposed will do grave damage to my property and farmlands, wetlands and rural communities. Economic justification for doing this project and spending this kind of money is no longer valid. NAETA is no longer an issue as it was originally designed. This project has been in a study for 11 years with mare " not feasible" results.

Our tax dollars will be better spent on upgrading and improving existing roads and bridges than on building interstate highways using all new terrain.

I urge you to oppose the extension of I69 using all new terrain and to promote economically sound, rational transportation planning. Please let me know your thoughts on this issue.

Sincerely Yours,

Lorraine Sirucek

PROGRAM HONORING STORM CEMETERY VETERANS
October 2, 1994
2:30 PM

Color Ceremony & Flag Raising

Boy Scouts of Troop 466

Introductory Talk on Storm Cemetery

Mildred Uland of Greene County Historical Society

Introduction of Mrs. McCloskey

Kathleen Barnes of William Clenny Chapter NSDAR

Presentation of Flag

Roberta McCloskey

Introduction of Dr. Arthur W. Collins

Rosemary Fordyce, President
Greene County Historical Society

Speech: "Should Auld Acquaintance Be Recalled"

Dr. Arthur W. Collins

Daughters of the American Revolution Tribute

Shirley Short, Vice Regent
Deloris Aydelotte, Chaplin
William Clenny Chapter, NSDAR
assisted by Boy Scout Troop 466

Gun Salute

American Legion Post 450 (Solsberry)

Closing Prayer

Dr. Arthur W. Collins

Veterans and Patriots:

1. Thomas Edwards	Revolutionary War	VA
2. Thomas Ferguson	Revolutionary War	VA
3. Adam Rainbolt	Revolutionary War	NC
4. John Storm	Revolutionary War	VA
5. John Rainbolt	War of 1812	
6. Samuel Riddle	Mexican War (1846-48)	IN
7. John M. Riddle	Civil War	IN
8. Joel Sexson	Civil War	IN

Storm Cemetery honors veterans

Between 75 and 100 people gathered at Storm Cemetery in eastern Greene County near Hobbieville last week to honor the veterans of four early American wars who are buried there.

Storm Cemetery is the final resting place of four known Revolutionary War soldiers, one veteran of the War of 1812, one Mexican War veteran, two Civil War soldiers, and quite a few other 19th century folk. The last burial took place there in 1901. The first recorded burial was in 1819. Many of the graves no longer have markers; some may never have been marked. The place is named for John Storm, one of the Revolutionary War veterans, who donated the land from his farm for the burial ground.

Descendants of nearly all of Storm Cemetery's veterans were on hand for the ceremony.

Descendants of the veterans came from nearby areas as well as from more distant places. Some traveled from Indianapolis to be a part of the event honoring Revolutionary War soldiers and patriots Thomas Edwards, Thomas Ferguson, Adam Rainbolt, and John Storm, and the other veterans: John Rainbolt (War of 1812), Samuel Riddle (Mexican War), and John M. Riddle and Joel Sexson (Civil War).

Dr. Arthur Collins, a decesdant of one of the Revolutionary War veterans, drove up from Lynnville where he is pastor of the United Methodist Church. Collins was the main speaker at the ... reflected on the importance of the long-dead as a reassurance to our national and personal stability in difficult times.

"Think of the dead as a sea anchor," he said. "A sea anchor enables a ship in danger of being overwhelmed to heave to and hold its position. And so, the long line for former generations,...by their connection to us somehow enable us to face great dangers and grievous conditions, and not founder."

No war represented by a veteran buried here went unrepresented by descendants gathered.

There were also some more recent veterans on hand. The most visible of these were in the persons of American Legion Post 450 of Solsberry. The post Legionnaires Joe Wright, Paul Cox, Burrell Lindsey, Bob Crowe, Alvin Crowe, Gerald Hash, Kenney Flynn, Thomas Flynn, Sam Walters, Marvin Harper, and Frank Bailey.

The event was sponsored by the Greene County Historical Society with other official groups participating in the ceremony. Mildred Uland, of the Historical Society, spoke about the involvement of the many individuals and groups who worked to make the day possible.

Boy Scout Troop 466 of Eastern Heights and their Scoutmaster, David Walters, cleaned the cemetery after the township trustee, Roscoe Raines, had chopped out the major over-growth of vines, brambles, and ...

The cemetery clean-up was the community service project of Scout Jamie Speer for his Eagle rank. He also supervised the Scouts' participation in the ceremony and posted signs pointing the route to the well-concealed location of the cemetery.

The Scouts opened the program with the raising of the American flag and the Pledge of Allegiance, led by Jamie Speer. Six other Boy Scouts — Philip Bough, Jeremy Bough, Jarrod Wallace, Levi Vanwinkle, Jimmy Baukat, and Justin Baukat; two Cub Scouts — Sean Bauket, Steven Hurst; and one Girl Scout, Kristina Wallace, assisted in the colors ceremony and helped the Daughters of the American Revolution place floral arrangements at the graves of the veterans.

Roberta McCloskey, wife of Congressman McCloskey, presented an American flag to fly from the flag pole erected on the site by the Scouts. Rosemary Fordyce, President of the Historical Society, accepted the flag on behalf of the cemetery.

The Daughters of the American Revolution were represented by two area chapters, William Clenney Chapter, and Bloomington Chapter. Members of the William Clenny Chapter had worked with the Historical Society to organize the event.

Members of the Bloomington Chapter had read of the program and came to be among the spectators honoring the veterans. They soon found ...

The DAR participation was led by the Vice-Regent of the William Clenny Chapter, Shirley Short, and Chaplain Deloris Aydelotte, along with chapter members Kathleen Barnes and Julia Skeel.

Bloomington Chapter Regent Lucile Moore, first Vice-Regent Julia Deckard, and State Pressbook Chairman Betty Yoder joined in the liturgy with the William Clenny Chapter.

The program drew toward its close with a gun salute fired by Solsberry American Legion Post 450 followed by the playing of Taps.

The ceremony ended with a benediction by Collins in which he remembered not only the dead, but the living, praying for this country's present soldiers — those currently in Haiti and elsewhere around the world — and for those among us who volunteer their time and labor here in service to their neighbors.

After the ceremony, spectators searched out relatives, some dead and buried, and some alive and previously unknown to each other. They took family pictures next to tombstones. Other people knelt in the grass and dirt, attempting to decipher worn inscriptions. Many people took a general interest in all the old stones, regardless of family affiliation.

By the end of the afternoon, the remote past seemed a bit more within reach of some people wandering around on a hidden Indiana hilltop ...

Sunday Herald-Times

Friday
September 30, 1994
Bloomington, Indiana

REGION

GREENE

Flag ceremony at cemetery

HOBBIEVILLE — Eastern Greene County's Storm Cemetery has been cleaned up for company for a flag-raising and flagpole dedication ceremony at 2:30 Sunday afternoon.

Among those buried in the cemetery off Rock East Road are four soldiers from the Revolutionary War, one veteran of the War of 1812, one from the Mexican War and two from the Civil War.

Boy Scouts from Eastern Heights will lead the flag ceremony Sunday. A flag given by U.S. Rep. Frank McCloskey will be flown over the cemetery.

The Rev. Arthur Collins, a descendent of one of veteran's buried at the cemetery, is the speaker. Members of the Solsberry American Legion and the William Clenny chapter of the Daughters of the American Revolution also will be there.

To get to the cemetery, turn onto Breeden Road just west of Stanford. Go about four miles to Rock East Road and turn right. The drive leading to the cemetery is about two miles on the right.

Greene County Historical Society honoring veterans buried in Storm Cemetery

■ McCloskey presenting flag for burial grounds.

By Ryan DuVall
Daily Citizen Staff Writer

The Greene County Historical Society is holding a ceremony Sunday at 2:30 p.m. in the Storm Cemetery in eastern Greene County to honor the veterans of four early-American wars who are buried there.

Congressman Frank McCloskey and his wife Roberta will be on hand to present a flag to be flown at the burial ground on national holidays.

The cemetery is the final resting place for eight known veterans of the Revolutionary War, the War of 1812, the Mexican American War, and the Civil War.

Arthur W. Collins, a Methodist minister and a descendant of one of the Revolutionary veterans, will be the main speaker at the ceremony and DAR chapter member William Clenny, the Boy Scout Troop #466 from Eastern Heights and members of the American Legion Post #450 in Solsberry will be attending.

A number of descendants of these veterans live in the area and are invited to attend the ceremony along with other interested members of the public. The veterans buried there are Thomas Edwards, Thomas Ferguson, Adam Rainbolt and John Storm (for whom the cemetery is named) from the Revolutionary War; John Rainbolt from the War of 1812; Samuel Riddle from the Mex-

See CEMETERY, Page 2

LL 847-4487

Linton Daily Citizen Sept. 30, 1994 p. 1

CEMETERY

CONTINUED FROM PAGE 1

ican-American War; and John M. Riddle and Joel Sexson from the Civil War. The first burial in the cemetery was in 1819 and the last in 1901.

Kathleen Barnes of Linton, who is a descendant of Edwards, calls the cemetery one of the most historic in Greene County and hopes the ceremony will spark interest and help keep it maintained.

She said there were weeds and vines over 6 ft. tall covering up most of the graves and, if not for the efforts of the scout troop and leadership of David Walters who have cleared the site four times, she hates to think of what kind of shape it would be in.

"The cemetery is very neglected," Barnes said. "It has been a problem getting the place cleaned up."

Storm Cemetery is located in Center Township, one mile north of Hobbieville. It is on private land 50 feet off of county road 1320 E in Center Township.

Linton Daily Citizen p. 2 Sept. 30, 1994

Ceremony at Storm Cemetery honors veterans buried there

■ Congressman's wife presents flag to Greene County Historical Society.

By Ryan DuVall
Daily Citizen Staff Writer

Roberta McCloskey, the wife of Congressman Frank McCloskey, was on hand yesterday to present a flag to the Greene County Historical Society during a ceremony to honor the veterans of the Revolutionary War, Civil War, the Mexican-American War and the War of 1812 at the Storm Cemetery in eastern Greene County.

McCloskey, who was attending the event on behalf of her husband who had to ride in the Apple Festival Parade, said the event was very important to the congressman.

"Frank is very concerned about veterans and so am I," McCloskey said. "It is such great pleasure that I can present this flag to the historical society."

The flag, which will be flown at the cemetery on national holidays, was flown over the Capital in Washington, D.C., on Nov. 13 1994.

Over 30 direct descendents of the veterans, members of the William Clenny chapter of the Daughters of the American Revolution, members of the American Legion Post 450 of Solsberry and Boy Scouts from Troop 466 of Cincinnati, and a number of onlookers took part in honoring the eight veterans buried there.

They included Thomas Edwards, Thomas Ferguson, Adam Rainbolt and John Storm of the Revolutionary War; John Riddle and Joel Sexson of the Civil War; John Rainbolt of the War of 1812; and Samuel Riddle of the Mexican-American War.

Mildred Uland of the Greene County Historical Society gave an introductory talk on the cemetery before Kathleen Barnes, a descendant of Edwards, introduced McCloskey.

Uland said Barnes came to her about a year ago looking for Edwards when the two first visited the site.

Barnes, who grew up in Greenwood, said she was not even aware that she had a tie to Greene County at first, but, after finding out about Edwards, she worked very hard to

See CEMETERY, Page 2

Linton Daily Citizen Oct. 3, 1994 p. 1

CEMETERY

CONTINUED FROM PAGE 1

find out all she could.

"I can trace this entirely through the female line (of my family)," Barnes said. "I also have seven other Revolutionary War ancestors."

According to Barnes, much of the credit for the ceremony goes to Uland, Trustee Roscoe Raines and Troop 466 for their hard work.

"(Uland) is the one who stirred up the people and she deserves a lot of credit," Barnes said.

When they first visited the cemetery, Uland said she could only see a few gravestones and that the entire area was full of weeds and briars.

But, as a result of the hard work by Troop 466 and James Speers, the cemetery was in beautiful condition for the ceremony.

Speers, a 17-year-old scout from Bloomfield, put in over 15 hours of work on the cemetery and built a flagpole for the site as a part of his Eagle Scout project.

"The scouts worked really hard and a lot of credit should go to them as well," Barnes said.

After the flag presentation, Barnes brother, Rev. Arthur Collins, delivered a speech, "Should Auld Acquaintance be Recalled."

Collins said he was happy to be at the ceremony and was pleased to see all of the people out to support the cemetery.

"We need to know from who we are sprung," Collins said. "There are few places with the long continuity between living and dead."

After a tribute by the DAR, the ceremony with a gun salute by Post 450 and a prayer by Collins.

Uland said it was particularly nice to be able to honor the veterans and thinks the ceremony shows that young people are interested in history and all that the society is about.

"I believe the old soldiers would be happy if they could see the large crowd gathered here their honor."

Bloomfield County World Sept. 22, 1994 p. 2

Historical Society to honor veterans

The Greene County Historical Society is holding a ceremony on Sunday, Oct. 2, at 2:30 p.m. in Storm Cemetery in eastern Greene County to honor the veterans of four early American wars who are buried there.

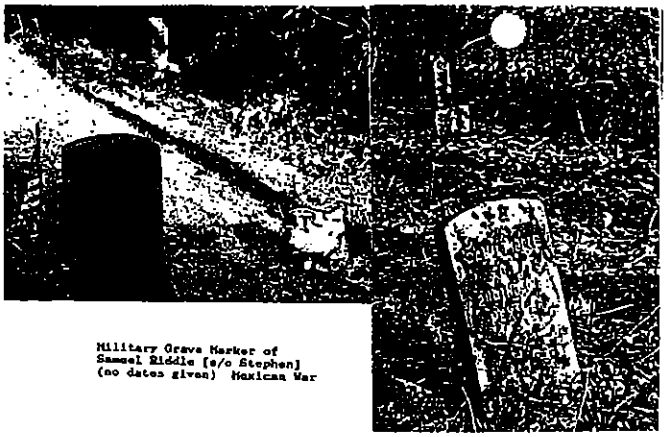
The wife of Congressman McCloskey will present a flag to be flown at this historic early burial ground on national holidays. The cemetery is the final resting place for eight known veterans of the Revolutionary War, War of 1812, Mexican War (1846-48) and the Civil War.

A number of descendants of these early veterans live in the area and are invited to attend the ceremony along with other interested members of the public. The veterans buried there are Thomas Edwards, Thomas Ferguson, Adam Rainbolt and John Storm (Revolutionary War); John Rainbolt (War of 1812); Samuel Riddle (Mexican War); and John M. Riddle and Joel Sexson (Civil War).

Storm Cemetery is located in Center Township, one mile north of Hobbieville. It is on private land off County Road 1320E.

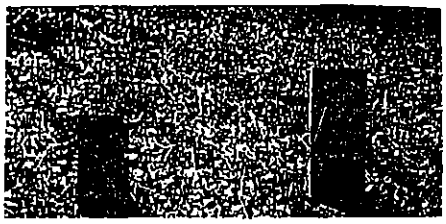
Grave Markers of
John Rainbolt [center]
Jacob Rainbolt [right]
[s/o J & E. 1825-1860]
Freelove Rainbolt [left]
(2nd w/o John. 1794-1866)

Grave Marker of John Rainbolt
(1788-1873) [s/o Adam]
War of 1812



Military Grave Marker of
Samuel Riddle [s/o Stephen]
(no dates given) Mexican War

Military Grave Marker of
John M. Riddle (1835-1863)
Civil War



Grave Marker of Joel Sexton
(1801-1868) Civil War
Beside marker of his wife
Abigail Sexton (1805-1884)

October 2. 1994
Kathleen Barnes

Introduction of Mrs. McCloskey

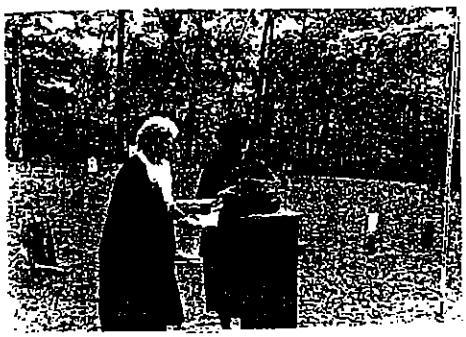
When we met with Mr. Walters and his scouts while they were helping to clear this cemetery of its excess vegetation, we asked him if they could erect a temporary flag pole for the ceremony here today. Mr. Walters volunteered to install a permanent flag pole. We thanked him and said that would be very nice, but since we had no flag to fly from it and no funds to obtain one, we thought a permanent flag pole would be wasted.

Mr. Walters suggested we contact Congressman McCloskey to see if he could send us a flag. I called the congressman's office and spoke with Ms. Melinda Plaisier about our project. She said she thought it would be something Mr. McCloskey would be very interested in doing. I explained that our ceremony was the same date and time as the Bloomfield Apple Festival parade so we didn't expect Mr. McCloskey would be able to attend the ceremony, and since time was rather short, we also didn't expect the flag in time for the ceremony, but we would like to have one to raise here at the cemetery on national holidays in the future.

When I next heard from Ms. Plaisier, she told me that not only would the congressman like to send us a flag, he would like to send along Mrs. McCloskey to present it to us since he did have the Apple Festival Parade as a prior commitment and could not be here in person. Mrs. McCloskey had become very interested in our project herself and wanted to be here to present us with the flag--which I believe is a personal donation of the congressman, not at taxpayer expense. We very much appreciate this gesture.

So at this time, I would like to introduce Roberta McCloskey who will make the presentation to the President of the Greene County Historical Society, Rosemary Fordyce.

Kathleen Barnes
William Clenny Chapt. NSDAR



Rosemary Fordyce (left)
Greene County Historical
Society
Roberta McCloskey (right)
wife of Congressman McCloskey

THE FLAG
OF THE
UNITED STATES
OF AMERICA

This is to certify that the accompanying flag was flown over the United States Capitol on September 14, 1994, at the request of the Honorable Frank McCloskey, Member of Congress.

This flag was flown for Storm Cemetery in memory of the 8 known veterans who served their country during the Revolutionary War, War of 1812, Mexican War and the Civil War.

George M. White, FAIA
Architect of the Capitol

DNR Indiana Department of Natural Resources

Frank O'Bannon, Governor
Larry D. Macklin, Director

21 December 1999

Jerry and Lorraine Sirucek
4839 Ridgewood Drive
Bloomington, IN 47404

Dear Mr. & Mrs. Sirucek:

Please find attached a copy of the final report for the 1998-1999 population census of Indiana bat winter hibernacula in Indiana. As in previous years, this census was conducted by Dr. Virgil Brack, Jr. of BHE Environmental, Inc. through funding provided by the Indiana Nongame and Endangered Wildlife Program. The report contains information on the bat population in Sexton Springs Cave on pages 25-26.

If you have any questions about the report or its contents, please feel free to contact me at the address or phone number listed below. Thanks again for your continued support of our Indiana bat recovery efforts.

Sincerely,

Scott A. Johnson
Nongame Wildlife Biologist
Indiana Department of Natural Resources
553 East Miller Drive
Bloomington, IN 47401
(812) 334-~~H27~~
1137

An Equal Opportunity Empl
Printed on Recycled Paper

Project 1053.01 December 1999

A 1998-1999 WINTER SURVEY FOR INDIANA BATS (MYOTIS SODALIS) IN HIBERNACULA OF INDIANA

For:

INDIANA DEPARTMENT OF NATURAL RESOURCES
DIVISION OF FISH AND WILDLIFE
NONGAME AND ENDANGERED WILDLIFE PROGRAM
ROOM W273, INDIANA GOVERNMENT CENTER SOUTH
402 WEST WASHINGTON STREET
INDIANAPOLIS, INDIANA 46204

By:

Virgil Brack, Jr., Ph.D.
BHE Environmental, Inc.
11733 Chesterdale Road
Cincinnati, OH 45246

and

Keith Dunlap, PE.
Indiana Karst Conservancy
P.O. Box 2401
Indianapolis, Indiana 46206

Patrick J. Munson and Cheryl Ann Munson
6707 W. Rock East Road
Bloomington, IN 47403
(812-824-7717)

2 November 2002

Mr. Mike Grovak, Project Manager
Bernardin, Lochmueller & Assoc., Inc.
6200 Vogel Road
Evansville, IN 47715

Re: Recorded historic cemeteries in Proposed I-69 Alt. 3a-c, Monroe and eastern Greene counties

Dear Sir:

Our comments address only those segments of Proposed I-69 Alternatives 3a, 3b, and 3c that lie in Monroe County and immediately adjacent parts of northeastern Greene County (see enclosed map).

In these segments the Draft Environmental Impact Statement (DEIS) shows 43 historic cemeteries within the Two-Mile Study Bands. The great majority of these lie outside the 2000' study corridor, and hence would be, we assume, easily avoided. However, four cemeteries (Freeman, Storm, Carmichael, Ham – all in Greene County) lie directly in the 2000' corridors. Two of these, given their locations relative to the centerline, are of particular note:

> *Storm* lies on the proposed centerline where a bridge would cross Indian Creek. This is one of oldest cemeteries in Greene Co. (first burial 1819), and contains among it 50+ graves, including those of at least three veterans of the Revolutionary War.
>
> *Carmichael* lies just west of the proposed centerline where there is a proposed overpass or underpass for Carmichael Road. This is a large cemetery, with hundreds of graves. 4.3.6

Of greater concern at this stage of planning are nine cemeteries that are recorded by the Monroe County Historical Society and the Greene County Historical and are located in the Study Bands, *but are not shown in the DEIS.* Five of these (Wright, Hoadley, Wampler, Collier, Star) are small cemeteries that lie outside the 2000' corridor, as it is presently drawn. However, the other four are of particular concern:

> *Adams*, is in the northern part of Sec. 7, Indian Creek Twp., Monroe Co. This very old, well-known, well-maintained cemetery of about 75 graves lies on the centerline where Alt. 3c diverges from Alt. 3a-b.

> *Hardy Sparks*, SE 1/4 of NE 1/4 Sec. 12, Center Twp., Greene Co. (not to be confused with Sparks Cemetery near center of Sec. 1 of the same township), is about 2000' southwest of the Adams Cemetery and is on the western edge of the combined Alt. 3a-c in the 2000' Corridor. It contains at least eight graves (including one veteran of the War of 1812).
>
> *Philpot*, NE 1/4 of NE 1/4 sec. 25, Beech Creek Twp., Greene Co., lies along eastern edge of the Alt. 3a-b's 2000' Corridor. 4.3.6
>
> *Kercham*, NW 1/4 of NW 1/4 Sec. 6, Clear Twp., Monroe Co., is a very old, well-maintained, and well-known cemetery (which is clearly marked on the USGS Clear Creek quad) of about 60 graves, including a veteran of the Revolutionary War. It lies in the Two-Mile Band and not very far outside the 2000' Corridor of Alt. 3c.

We take some comfort in INDOT's statement that cemeteries will be avoided "whenever possible." *But how can engineers design a right-of-way that avoids cemeteries if their locations are not part of the planning study?*

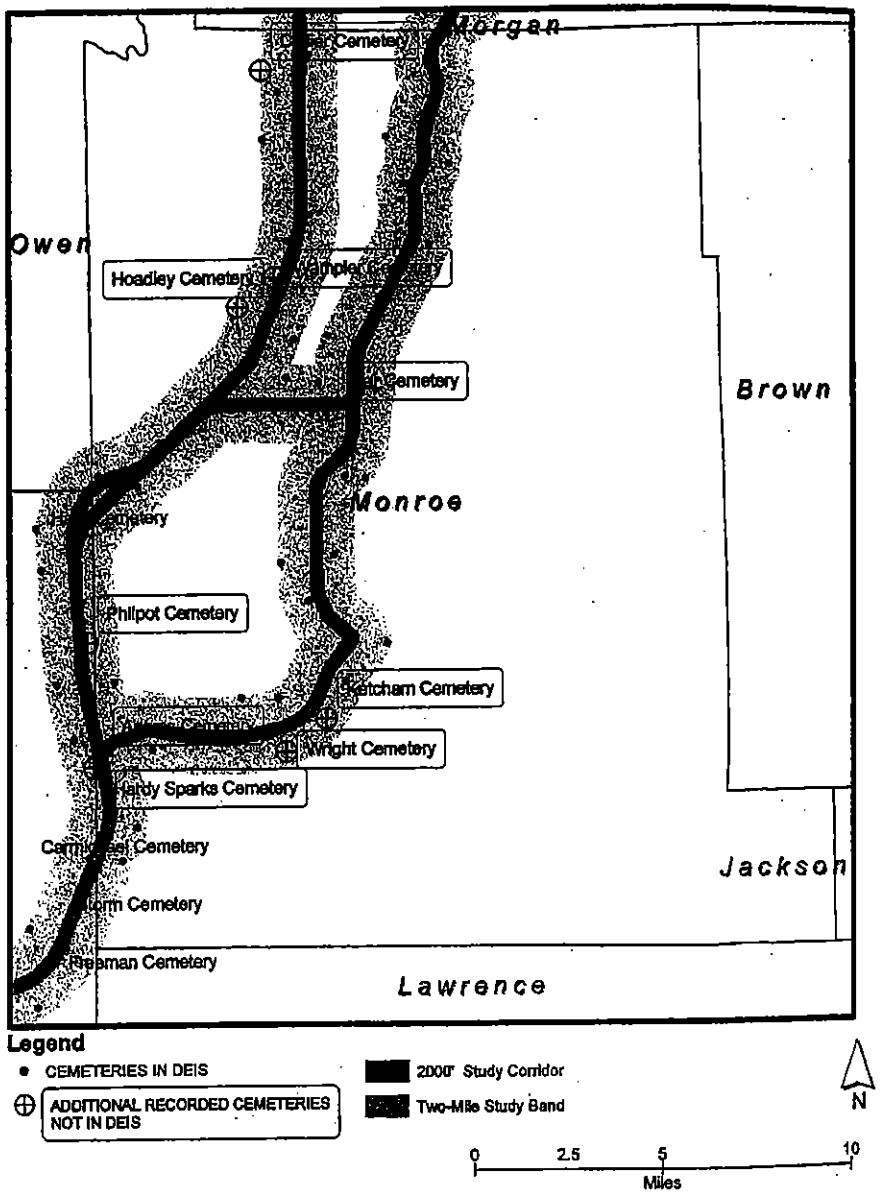
Yet another observation and question: In the small part of the Proposed I-69 corridors considered here there are 52 recorded cemeteries, of which nine were missed or omitted in the DEIS. Is this "failure rate" (17%) typical for recorded cemeteries in others parts of the proposed corridors?

Sincerely,

Patrick J. Munson

Cheryl Ann Munson

cc: B. Nichol (INDOT)
State Historic Preservation Officer
Monroe County Historical Society
Greene County Historical Society
Monroe County Commissioners
Monroe County Plan Commission
T. & S. Tokarski (CARR)



Governor's Internet Mail

From: Buffie Mink [mrsmonkey13@yahoo.com]
Sent: Wednesday, October 23, 2002 2:14 PM
To: Governor's Internet Mail; senator_lugar@lugar.senate.gov; senator@bayh-iq.senate.gov; John.Hostettler@mail.house.gov; Rep.Carson@mail.house.gov
Subject: I69 New terrain

To whom it may concern,
I am writing in response to the proposed new terrain route for I-69. If the new route is chosen that goes through Monroe county, several acres of the Hoosier National Forest will be destroyed along with several acres of farm land. On this farm land, at the border between Monroe and Green counties are several family cemetaries. One in particular, off of Rock East Road is the resting place for soldiers from the Mexican-American, Civil, and Revolutionary wars. I want to urge you to vote no to new terrain I-69 and choose alternative 1 (I-70/US 41).
Sincerely,

Buffie R. Mink

4.3.6

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Y! Web Hosting - Let the expert host your web site
http://webhosting.yahoo.com/

1023-048

Subj: DEIS Comments
Date: 11/4/02 8:36:37 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Chad
Address = 4417 Eagle crk dr
City = indpls
State = IN
ZIP = 46254
Email = slaes10@hotmail.com
Message = With the economy as it is and the terrible impact it would have on the beautiful land in SW IN, i can't see why the 70-41 improvement would not be the best way!! I will fight this to the end, esp. if the Alt. 3 passes... Alt. 3 goes thru some areas of Greene County that will put a family cemetery and church in danger!! I'm sure if this were going thru the some of the governor's land in Southern Indiana, it would not even be an optional alternative. I truly hope that all the people with all the land and memories you hoping to steal from SW Indiana will come forward and voice their opinions. 4.3.6

1104-006 Chad.wpd

VIA OVERNIGHT COURIER

November 4, 2002

Lyle Sadler, Project Manager
Indiana Department of Transportation
100 N. Senate Avenue, Room N855
Indianapolis IN 46204-2218

Re: Highway I-69 Alternative Route to C-1

Dear Mr. Sadler:

This alternative would divide and destroy a working farm which has been held by the Landers family of Landersdale, Indiana since the early 1800's when Presidents Jackson, Monroe and J.Q. Adams signed the original land grants to the present farm. Our work in seeking to prolong that land's use as a farm would also be destroyed. Even a family graveyard, in which Revolutionary War veterans are buried, might be disturbed. Indeed, the house immediately south of the Landers family graveyard (currently owned by Senator Lugar's family as part of their adjoining farm) is said to enclose the original Landers-Stone log cabin. 4.3.6

Sentiment and history should, we believe, have every bit as much to do with highway location as pure dollar and cents calculation. If these intangibles are taken into account, they would provide a powerful incentive to pick another of the viable alternatives. We doubt that any of them would as badly treat original settler locations. Additionally, we believe a location which connected to I-70, rather than I-465, would make better sense from the viewpoint of traffic management and airport access.

Yours very truly,

William Landers

WL:mm

cc: Senator Richard G. Lugar, via U.S. mail
Elizabeth H. Headley, via U.S. mail
Andrew R. Landers, via U.S. mail
J. Lee Robbins, Esq., via U.S. mail

1104-052

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

My reasons for not wanting I-69 are personal. I moved to Indiana 7 years ago. We used to live in Houston, TX. It was so refreshing to be out in the country. Every year since I was a little girl we would take our vacation here in Indiana and when my dad retired we moved here with him. 2 years after we moved here he passed away. He is buried in a cemetery outside of Plainville. Not only him but my grandmother, grandfather, great uncle and my grandmother's first husband are also buried there. That's 5 people of our family buried in a spot they want to tear up and build a highway through it. The other reasons I have are the cost involved I-70-41 makes more since and would be more cost effective. I can go in my back yard and see the stars. There is wildlife that would be destroyed and history that would be lost if this highway goes through

4.3.6

Name Lylyn Slough

Address RR 4 Box 588

City/State/Zip Bloomfield, IN 47424

1028-045

PAGE 2

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

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PLEASE ENTER YOUR COMMENTS BELOW.

besides fond memories that can never be replaced. I also have an elderly Aunt who is a mother to me and a great Aunt in Elnora that it would wipe out their home. This is not right. They say it will create more jobs, ~~[illegible]~~ but they will be low paying jobs. What it will do is bring crime and violence into the heart of our state and we will have another Shandra Heavy and kidnappings + worse. It will give drug runners a free highway. Taxes would have to be increased to pay for it and it would be put on the shoulders of those that are poor. We would have to pay for a highway that we don't want.

Name Lylyn Slough

Address RR 4 Box 588

City/State/Zip Bloomfield, IN 47424

Subj: New I-69 Study Form Feedback
Date: 10/17/02 2:31:15 PM EST
From: lrobins@indiana.edu (Larry Robinson)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Larry Robinson
1200 S Park Ave
Bloomington, IN 47401-6008

Message:
1. Why is the religion of Enviroment Worship given preference over other religions? Option 3B, which I otherwise favor, requires tearing down two churches to save a creek which until recently was used as a trash dump. 5.1.1

2. I would suggest that the reason Tom Tocarski is so against the highway is that option 3C, as well as the original route, takes his house.

3. I suggest that evergreens be planted in a buffer space on both sides of the highway, like they do in Virginia. This really works at reducing the noise and unsightliness of the Interstate highways there. 5.15
4. A telephone poll has shown that the anti-I-69 group is a small, but extremely loud minority.

1017-009 Robinson, Larry.wpd

United States Department of Agriculture | Forest Service | Hoosier National Forest Supervisor's Office
811 Constitution Avenue
Bedford, IN 47421
Phone: 812-275-5987
Fax: 812-279-3423
TDD: 812-275-7817

File Code: 1950-5
Date: November 5, 2002

Michael Grovak
Bernardin, Lochmueller & Associates, Inc.
6200 Vogel Road
Evansville, IN 47715

Dear Mr. Grovak,

This is in response to your request for comments on the Tier 1 Draft Environmental Impact Statement (EIS) for the Evansville to Indianapolis portion of I-69. Before I discuss the proposed routes that affect the Hoosier National Forest, I would like to commend you and your staff on a job well done. I found the document easy to read and understand and I am very pleased with the way our previous input was included in the document. 5.1.3

I would like to repeat our desire that alternatives that utilize Highway 50 not be selected as the preferred route. The portion of the national forest split by Highway 50 has been designated the Tincher Special Area due to its karst features and cave fauna. There are 15 known caves and over 32 other karst features in this 4,180-acre special area. Only a few of the caves have been inventoried for species and all inventories have been north of Highway 50. Eighteen cave species, three of which are new to science, have been found since the inventory work started in 2000. The Tincher Special Area is one of the most significant karst areas in Indiana. If two more cave species are found, and we expect they will be, the Tincher Special Area will be a global subterranean hotspot. At least 14 of the cave fauna found to date are ranked G3 or higher. 6.2

Cave species are particularly susceptible to a wide variety of disturbances since they are located in restricted cave environments. These systems depend on stable levels of air, water, detritus, temperature, and humidity. The kinds of disturbance caused by activities such as road construction could have serious negative impacts to those ecosystems and the species that depend on them.

In addition, there is the potential for Indiana bats to occur in the Tincher Special Area. Other bats have been noted in the area. The old Gardner mine and Pennsylvania Salt Company workings are in Tincher. Surveys thus far have not identified any Indiana bats. However, there is a known Indiana bat hibernaculum about five miles away in Martin County and it is possible the Tincher Special Area could provide foraging and roosting habitat for the Indiana bat. 5.17

The Hoosier National Forest manages special areas to protect, perpetuate or restore their special features and values. Management is also done for Federally listed threatened, endangered, and proposed species, state listed species and Regional Forester's sensitive species (RFSS). Our RFSS species are also state-listed sensitive species.

The Tincher Special Area has one designated recreation site, Tincher Pond. Berry Pond has potential for dispersed recreation use since it has good fishing. Georgia Pond has been breached and now serves as a wetland. Although there are few developed recreation sites, the area is available for dispersed recreation. Backpacking, hiking, camping, hunting, and fishing are some of the recreational activities in Tincher. There is a trail to Tincher Pond and plans for a hiking trail in the future. 8.2

Additional details about Tincher are contained in the documents and GIS layer we have previously provided to you. These references include the *Forest Plan*, Tincher Special Area Management Plan prepared in 1995, the four-page report on the special area prepared January 8, 2002, and my two previous letters on this project.

The Tincher area has not been studied intensely. We believe such surveys should be completed before a decision to utilize the Highway 50 corridor for I-69 is made: 5.23

- Additional dye tracing
- Heritage resource surveys
- Plant and animal surveys due to the habitat that is available
- Cave bioinventories

In addition to our comments about the Tincher Special Area, we would like to see mitigation for several natural resources, which includes the wildlife that would utilize them, and would welcome the opportunity to work with you on such mitigation.

We would like to see forested lands mitigated at a 1:3 ratio – for every acre of forested land needed for I-69, replace it with 3 acres protected somewhere else. One method of such mitigation is to acquire other forested lands that would become part of the Hoosier National Forest, a Fish and Wildlife Refuge, or an Indiana Department of Natural Resources property. The Hoosier National Forest always receives more inquiries from people who wish to sell their land to the national forest than our budget will ever cover. We use 12 criteria, including potential wetland restoration and threatened or endangered species habitat, to prioritize acquisitions. Foraging habitat for Indiana bat could be covered as part of the overall prioritization. 7.1

We would like to see wetlands mitigated beyond "no net loss" on a 1:4 ratio. Wetlands are disappearing in Indiana at a high rate. The same process as for forested land could be used – acquire lands suitable for wetland restoration. 7.1

We would also like to see karst mitigated. We believe that this should also be a 1:4 ratio. There may be opportunities near Wesley Chapel Gulf in the national forest to acquire important karst features so that they can be protected and studied. Most karst features in private ownership are not protected and in many cases are actually harmed due to the lack of understanding about this unique, important part of Indiana. 7.1

There is one correction we would like to see made in future documents. Please delete the term Fuzzy Hole Natural Area on pages 5-194 and 5-196. We do not use the term natural area when designating areas. Fuzzy Hole is a karst feature in the Tincher Special Area and references should be to the Tincher Special Area. 5.23

Thank you for the opportunity to have input on this project. If you have questions or need additional information, please contact Wilma Reed Marine at 812-275-5987.

Sincerely,

KENNETH G. DAY
Forest Supervisor

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

On the front your study seems somewhat complete, until you actually study the areas of where you are recommending the road deconstructed. Much of the New Terrain Route through Owen County Alone runs through wet lands, farms & native timber.

The road will be a dam to many water ways & creeks unseen on the surface. Karst topography also will be destroyed as well as underground water that feeds our wells. 5.24

You cannot do a study without studying the ground itself. This cannot be done in the drafting room using aerial photos & soil maps. Walk the paths of these proposed routes & see & feel what will be destroyed. 5.24

Do your homework better. Recommend US 40 & I70 for the most preferred Route.

1104.055

Name John + Virginia Dunn

Address R1 Box 290

City/State/Zip Freedom, IN 47431

RECEIVED NOV 4 2002 SLA

RECEIVED NOV 12 2002

MONROE COUNTY PLAN COMMISSION
Courthouse - Room 306
Bloomington, IN 47404
Telephone: (812)-349-2560 / Fax: (812)-349-2967
http://www.co.monroe.in.us/planningdept.html

November 4, 2002

Mike Grovak, Project Manager
Bernardin, Lochmueller, Associates, Inc.
6200 Vogel Road
Evansville, IN 47715

RE: Comment on the Draft Environmental Impact Statement for the Proposed Interstate 69

Mr. Grovak:

This letter is forwarded as comment on the Draft Environmental Impact Statement prepared for the proposed Interstate 69 which includes proposed routes that traverse portions of Monroe County. The Monroe County Plan Commission through Indiana Code Title 36 Article 7, as amended, is charged with developing policies and objectives for the future development of Monroe County, for land use development within Monroe County, and for the development of public ways, public places, public lands, public structures, and public utilities. It is within the scope of this charge that the DEIS has been reviewed and the corresponding comments have been made.

The Commissions fundamental concerns with the DEIS are the lack of comprehensiveness with the DEIS, how fundamental impacts are not addressed, and that the proposed routes through Monroe County have significant impacts that are not in the best interest of the community.

Specific concerns regarding the lack of comprehensiveness of the DEIS include the following:

- Failure to adequately discuss and analyze the potential impact upon the adopted land use and development policies of local communities. All three jurisdictions potentially impacted by a route through Monroe County (Monroe County, City of Bloomington, and the Town of Ellettsville) have adopted land use plans. These land use plans serve as the foundation for the communities decisions on project approvals, investments in infrastructure, and actions taken to protect environmentally sensitive features. 5.2

  These plans have been developed and adopted without consideration of nor demand for an interstate facility. Introduction of such a facility could dramatically alter the future

1104-061

location of land uses, public investments in infrastructure, etc. Further, such a facility could dramatically alter the stated preferred development pattern for the County, that is one where development is focused within the City of Bloomington, the Town of Ellettsville and several small rural communities dispersed throughout the County. It may prove difficult if not impossible, to continue to pursue such a development pattern should an interstate cross rural portions of the County. 5.2

On a more pragmatic note, each of the adopted plans would likely need to undergo significant revision and update. The costs associated with such an endeavor, likely to be in the hundreds of thousands of dollars, would be borne solely by the local communities. The DEIS simply fails to adequately consider local land use policies and to analyze what the impact of a new interstate on these policies would be. 5.2

- Failure to adequately evaluate impacts upon local facilities and services. The DEIS fails to identify the potential impact an interstate facility in Monroe County would have on the local road network, the vehicular movement of residents, emergency vehicles, and farm machinery. Without a comprehensive understanding of what local roads would be bisected or re-routed as a result of the interstate, decision makers cannot be fully aware of the impact the interstate would have on the same. Likewise, the DEIS provides no discussion regarding the funding source for construction of needed frontage roads, re-routing of local roads, etc. Again, without such information, decision makers cannot fully understand the actual impact of the interstate. 5.8

It is quite possible that currently available routes that area residents use to move about the county will no longer be available, in some cases adding considerable time to local travel. Likewise, the same impact may be felt by emergency services such as fire, ambulance, and law enforcement. In some cases, this may force the construction of additional facilities in areas not otherwise planned nor funded. Similar impacts will likely occur to truck traffic arising from area quarry operations and with farm machinery moving from field to field. Finally, local movements of non-vehicular traffic such as bicycles would in effect be limited to a very few locations, many of which are quite heavily used by vehicular traffic. Essentially no discussion of these topics is contained within the DEIS, again failing to provide decision makers with needed data upon which to base their decision. 5.8

Specific concerns regarding the extent of impacts identified in the DEIS include the following:

- Significant impact on the quality of life present in Monroe County and on local environmentally sensitive features. A very high quality of life exists in Monroe County, one that includes a strong and diversified economic base, strong housing market, outstanding cultural offerings, and a unique and beautiful physical environment. Each of these face significant impact from the placement of an interstate facility within Monroe County. 5.3

The DEIS identifies substantial impacts to the areas unique environmental features including karst features, caves, woodlands, wetlands, and farms. It is our belief that due to the limited research conducted regarding the presence and significance of environmental features, the impact will likely be far greater than identified in the DEIS. Relying solely on the data provided in the DEIS, we believe the environmental impacts associated with an interstate in Monroe County outweigh the perceived benefits to the residents and businesses located in Monroe County.

The DEIS identifies limited economic benefit for Monroe County residents from a new interstate traversing Monroe County. Indeed, it is our belief that most of any new jobs created as a result of a new interstate will be in the low paying service industry, often in the form of "big-box" retail and fast-food restaurants. Further, the DEIS identifies the potential for the removal of a number of existing local businesses, some that uniquely contribute to the Monroe County economy and the local quality of life, such as Oliver Winery and Worm's Way Garden Center. 5.5

The introduction of an interstate facility in Monroe County has the potential to significantly alter the current quality of life enjoyed by the residents of Monroe County. Impacts include the further bisecting of the community into east and west, reduction of non-vehicular movements from east to west, difficulty in local vehicular movements for residents, emergency vehicles, and farm machinery, loss of environmental features as discussed earlier, loss of unique businesses, additional air, noise, light, and water pollution, etc. Based on the data contained in the DEIS, it is our belief that the impacts on the quality of life for county residents are greater than any perceived benefits for the same.

In conclusion, we believe that the DEIS needs to be expanded to include further consideration of the items identified above, including evaluation of impacts upon locally adopted land use plans, transportation plans, and existing and future public facilities and services. Further we believe that the impacts associated with an interstate through Monroe County are greater than any perceived benefit to the residents of Monroe County.

We therefore, encourage BLA, Inc., INDOT, and FHWA to delay any decision until all of the necessary data has been collected and adequately analyzed and to focus on a facility that capitalizes on the use of existing roads outside of Monroe County, rather than the establishment of a new terrain facility.

Sincerely,

Brian O'Neill
President

John Irvine
Plan Commissioner

Charles Newman
Plan Commissioner

Carol Wise
Plan Commissioner

Scott Wells
Plan Commissioner

cc: Bryan Nicol, INDOT Highway Commissioner

October 7, 2002

Michael Grovak
Bernardin, Lochmueller & Associates, Inc.
6200 Vogel Road
Evansville, IN 47715

COMMENTS ON THE DRAFT EIS FOR THE I-69 HIGHWAY PROPOSAL

Karst Impacts:

The Draft EIS estimates that the five new-terrain "preferred" routes would destroy between 30 and 140 acres of karst land in the right-of-way alone, while the Common Sense I-70/US 41 route would consume no acres of karst. It is also my understanding that many hard working members of the Amish community around the Daviess County will be hard pressed to maintain their economic and cultural lifestyle because of the I-69 corridor slicing through their area. Also, there is no estimation of the amount of karst land that would be subsequently consumed along the new-terrain routes due to the secondary impacts of highway-induced sprawl development. Recent reports and polls of the people who live in the areas that would be affected by the construction of the "preferred" routes don't want the highway. They see the highway bringing crime, pollution and noise to their quiet rural existence. 5.2

The Draft EIS also underestimates karst features affected by the proposed new-terrain routes. For example, on some of the maps contained in the document's Environmental Atlas, notations indicate that no springs are located within the route corridors depicted on the maps. In fact, landowners in those corridors in Monroe and Owen Counties confirm the existence of springs. Landowners have also pointed out to INDOT the existence of caves in proposed corridors that INDOT was unaware of. **These are indications that the karst portion of the Draft EIS is clearly incomplete.**

The Draft EIS does not discuss the impacts of highway runoff or spills on karst systems. Petroleum and salt runoff and spills of hazardous or non-hazardous materials can have devastating impacts on **KARST ECOSYSTEMS** and **GROUNDWATER QUALITY.**

The Draft EIS is also silent on how damage to karst areas will be mitigated or reduced both during and after construction.

Other Environmental and Cultural Impacts:

The Draft EIS shows that the Common Sense I-70/US 41 route, compared to the five "preferred" routes will save:

- nearly 5,000 acres of farmland, of which over 3,500 acres is prime farmland;
- over 1,000 acres of forest;
- the Poatoka National Wildlife Refuge, 4 of the 5 "preferred" routes would cut through the Refuge, home to several threatened and endangered species like the Bald Eagle;
- the fourth largest Old Order Amish settlement in Indiana. 4 of the 5 "preferred" routes threaten this settlement in Daviess County.

Fiscal Impacts:

The Draft EIS also shows that the I-70/US 41 route would save nearly $600 million when compared to the five "preferred" routes. And this comes at a time when Indiana is experiencing one of the worst budget crises in state history. A dollar wasted on new-terrain I-69 is a dollar that could otherwise be spent on other, more deserving transportation projects like road maintenance, mass transit or rail.

In Summary:

While Karst seems to be the theme of this letter, the emphasis should be on doing what's right. Karst IS important to those who discover and explore caves. **But,** Karst is also important to those areas of Karst where people are unable to enter. This is what 99% of Karst is like. There is room enough for organisms and water to move about but not much more. This is where the groundwater flows. Without good, clean groundwater people would be unable to live. It has been shown that an above ground area of pollution **WILL** contaminate groundwater "down stream" 50 miles away.

I urge anyone reading this to strongly and vigorously consider the "preferred" routes for I-69 and use the Common Sense route of I-70/US 41.

William Bunting

William Bunting
105 Stephanie Lane Apt 31
Indianapolis, IN 46227-1054

November 4, 2002

Michael Grovak, Project Manager
Bernardin, Lochmueller & Associates, Inc
6200 Vogel Road
Evansville, IN 47715

Dear Mr. Grovak,

I am writing to protest the preferred proposed routes for the Evansville – Indianapolis I-69 project. The only one that is cost effective with minimal destruction of farm and forest land is the upgrade of I70/US41 route.

My concern is that politics are working for the groups that stand to receive the wealth from building new highway construction where upgrading an existing highway would be less profitable. Thus, providing an opportunity for multimillions of dollars to be derived from a "once in a lifetime project". I am sure this is a driving factor with the highway construction companies and those associated with these companies, knowing that their business will profit at the cost of other businesses, the farmer with the lost of the family farm, income and production of food products forever! How can a family farm be relocated when you can not produce more land? How can a hog producer move his hog operation with all of the new zoning laws created to prevent such a business from moving in? 5.2

I question where all this money to build a new super slab highway will come from. Governor O'Bannon just issued a release for early retirement for eligible state employees to cut costs. This year, state employees where asked to take days off without pay to help reduce costs. Many cost cutting actions have taken place in our state government to balance the state's budget. The state is in such financial crisis that it does not have extra money. Again, where will the state achieve the extra millions of dollars to build a new highway? Where will the additional funds come from to maintain this new highway and the existing highways we have now?

My greatest concern and protest is the fact that my family farm could be destroyed by one of the alternative routes 2B, 3A & 4B in Morgan County. My mother has not received any notification but our neighboring farms have received aerial shots. U. S. Senator Lugar opposes the route that can take his family farm. Just the same, I oppose the taking of all family farms, no matter who it is. And I hope that Senator Lugar will fight for all farmers, not just his own farm.

Indiana is losing more farm ground than other states. Why lose so much when we do not have to? The public outcry is to save our land; we only have today to make the best decision for our children and grandchildren. What a life long decision to make: spend more to save ten to fifteen minutes of time or spend less to save our land for the generations to come!

I pray that you will make the right decision for all and not just for a few.

Sincerely,

Carol Grubbs
5560 West Hurt Road
Monrovia, IN 46157

1104-060

GRAHAM FARMS INC.
P.O. Box 391
Washington, Indiana 47501
(812) 254-0716
November 6, 2002

Mr. Michael B. Grovak
Bernardin, Lochmueller & Associates, Inc.
6200 Vogel Road
Evansville, Indiana 47715-4006

Subject: Comment on I-69

Dear Mr. Grovak,

The purpose of this letter is to express support for Alternative #3 of the I-69 project and the Far Eastern route around Washington in particular. I also wish to raise concerns about the Far Western route that may have been overlooked. Graham Farms is a family farming operation which farms just over 3,300 acres in Daviess County. While three of the routes around Washington cut through land that we own, the one that makes the most sense and the one that benefits Daviess County the most is the Far Eastern. Like every landowner we would prefer that the alignment be on our neighbor, however, if Daviess County is fortunate enough to receive the final route, and the Far Eastern alignment is chosen, we would prefer that the route be as far east on our affected land as possible.

As you already appreciate from the findings of your Tier 1 study, we are located in a "stressed county" and are in desperate need of the opportunities that would be presented to us if we were fortunate enough to receive the final routing. As your report recognizes, population growth, an increase in employment trends, access to education, a rise in personal incomes and the corresponding reduction in poverty are all tied to being located **along** a four-lane highway. Alternative 3, going east of Washington, would be an asset to the County and mitigate the projected traffic congestion projected for the southern portion of Hwy 41 by 2025.

In reviewing the Tier 1 study, I noticed that no mention was made of the high concentration of irrigation used for farming that would be destroyed if the Far Western Alignment of Alt #3 was used to go around Washington. Because of irrigation, this land has become some of the highest producing land in the County and has become a very specialized area by growing not only tomatoes, pickles and green beans on a commercial level but yellow seed corn for Pioneer Seed as well. I have attached a copy of the Farmland Legend from the study and attempted to mark the 2,400 acres of irrigated production that would be directly affected. You may also wish to update your Prime Farmland Legend. 5.2

Both of the Western Alignments around Washington should not be considered because of environmental reasons. They fail to serve the Daviess County Airport and also disenfranchise the town of Montgomery.

Sincerely,

Thomas E. Graham, Jr., President

1107-688

enclosure

Subj: New I-69 Study Form Feedback
Date: 8/16/02 9:24:02 AM EST
From: breachmichael@stanleygroup.com (Michael Breach)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Michael Breach
3695 Calico Brook Ct.
Las Vegas, NV 89147

Message:
From your Executive Summary this sentance reads "The northern terminus of the project is I-465 on the south side of Indianapolis and southern terminus is I-69 just north of Evansville."

You need to be accurate and double-check your work before being taken seriously by those opposed to the project. The last line of this sentance should read..."terminus is I-64 just north of Evansville." 5.2

Please put me on your mailing list.

0816-006 Breach, Michael.wpd

Michael Grovak
Bernardin, Lochmueller + Associates, Inc.
6200 Vogel Rd.
Evansville, IN 47715

Oct. 24, 02

Dr. Mr. Grovak,

This letter is in response to the proposed new I-69 route through Southwestern Indiana. I am greatly in favor of the Common Sense I-70 and U.S. 41 alternative. There is already spreading evidence of uncontrolled sprawl development on the exits and surrounding areas of the existing North I-69 route. It's plain to see the loss of farmland and the increase of noise and pollution, strip malls and concrete and blacktop covers. This is our home, why are we proposing to trash it? 5.2

It's true I live in Indy but I travel periodically over these routes and it breaks my heart to see the increasing development and loss of natural environment, let alone the more hidden losses of communities and farmers.

Please help us protect our natural resources and the economy of--Southwestern Indiana and save millions of dollars. Please vote for the Common Sense alternative, that is, using I-70 and U.S. 41 to extend I-69.

Sincerely,
Barbara J. Ringo
Barbara J. Ringo
5610 Lakeland Dr.
Indpls., IN 46220

1024-036

Laura Hilden
4907 Somerset Rd.
Riverdale Park, MD 20737

Michael Grovak, Project Manager
Bernardin, Lochmueller and Associates
6200 Vogel Road
Evansville, IN 47715.

November 5, 2002

Dear Mr. Grovak;

I am pleased to have this opportunity to submit my comments on the Tier 1 Draft Environmental Impact Statement for the Evansville to Indianapolis segment of the I-69 highway project. This new DEIS is more readable and well-reasoned than the earlier DEIS from the 1990's.

I have two areas of comment. First, this new DEIS fails to include social and community impacts in the set of factors for evaluating the various alternative routes. Placing a major interstate highway in the very rural areas of southwestern Indiana may irreversibly disrupt communities adjacent to the chosen route. Social and community impacts include alterations to community character and are broader than the measures of displacement of residential and commercial establishments included in the current DEIS. Because the DEIS omits social and community impacts from the goal and impacts on which the various alternatives are evaluated, social and community impacts are not considered in the Tier 1 analysis as the major route decisions are made. If a preferred alternative for study in Tier 2 would have negative impacts on community character, these impacts will be much more difficult to avoid through route alignment and siting than they would be if they were factored into the initial choice of alternative routes.

Second, the DEIS does not make reference to any other regional transportation or economic plans for southwestern Indiana, nor does it suggest how the various routes would fit in to future regional planning efforts. The DEIS should not become the de facto transportation and economic plan for the region. Instead, southwestern Indiana needs comprehensive regional transportation and economic planning to address the transportation and economic issues that the DEIS goals attempt to address. The transportation and economic problems of southwestern Indiana are real, but a single interstate highway through the middle of the region as proposed in the preferred alternatives will not solve these problems. 5.2

I lived in southwestern Indiana for many years and hope to return. Since it won't be possible to undo the highway route or get back the money spent on it once it is built, I'd like to see some of the money that would be spent on a new-terrain route spent instead on a less expensive upgrade alternative, such as Alternatives 1 or 2, and the balance of state funds saved spent on regional transportation and economic planning and local road improvements.

Thank you for considering my comments.

Yours sincerely,

Laura Hilden

cc: Tom Tokarski, Citizens for Appropriate Rural Roads

1105-204

Subj: DEIS Comments
Date: 11/4/02 4:01:12 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Jay Bolden
Address = 6707 Derbyshire Road
City = Indianapolis
State = IN
ZIP = 46227
Email = jay_bolden@hotmail.com
Message = Mr. Grovak,

I strongly urge you to choose Alternative 1, the I-70/US41 route for extending I-69 to Evansville. Any other route for I-69 will destroy thousands of acres of farm and forestland and waste hundreds of millions of OUR tax dollars. I urge you to protect southwest Indiana by choosing the Common Sense I-70/US41 route for I-69.

I did not have time to read specific details in the dEIS that I was looking for, but I want to be sure that there is an accounting of potential residential sprawl due to interchanges and its effect on the environment, and an accounting for potential business lost along corridors not chosen. Growth isn't growth if you draw business to the interstate that were previously in existence elsewhere in Southwest Indiana. 5.3 5.2, 5.5

Sincerely Yours,

Jay Bolden

1104-017 Bolden, Jay.wpd

GRAHAM CHEESE CORPORATION
HIGHWAY 57 NORTH
ELNORA, INDIANA 47529
TEL. 812-692-5237
FAX. 812-692-5650.

FAX COVERSHEET Number of Pages (Including Cover) 2

DATE: 11/7/02

FROM: R.C. GRAHAM III

TO: MIKE GROVAK
FAX 812.479.6762

SUBJECT:

1107-684

GRAHAM CHEESE CORPORATION
HIGHWAY 57 NORTH
ELNORA, INDIANA 47529
TEL. 812-692-5237
FAX. 812-692-5650

November 6, 2002

Mr. Michael B. Grovak
Bernardin, Lochmueller & Associates, Inc.
6200 Vogel Road
Evansville, IN 47715-4006

Subject: Comment on I-69

The purpose of this letter is to express support for the I-69 project and to express a concern that would adversely affect Graham Cheese. We are located on the eastern edge of Elnora, Indiana along highway 57. The company is family owned and has been in Daviess County since 1928.

We are in favor of an extension of I-69 that would come through Daviess County as Alternative #3. As you already appreciate from the findings of your Tier 1 study, we are located in a "stressed county" and are in desperate need of the opportunities that would be presented to us if we were fortunate enough to receive the final routing. As your report recognizes, population growth, an increase in employment trends, access to education, a rise in personal incomes and the corresponding reduction in poverty are all tied to access to four-lane highways. The majority of county residence realize the highway's importance to our future.

I am concerned, however, because the western edge of the 2000' study area encroaches onto our storage lagoons and irrigation field that we use for land application of our whey and wash water. The area affected is permitted under the Indiana Department of Environmental Management. It is the only economical alternative open to us as we are boxed in by the town of Elnora, highway 57, the railroad and the Vertrees Ditch lateral. 5.2

Our hope is that the final alignment can be moved to the east. By moving the route further east, our lagoons and disposal fields would not be affected, the town of Elnora would be served, the town of Odon and North Daviess Schools would have better access and the road would be more direct to Crane and Bloomington.

Sincerely,

Robert C. Graham III
President

Joseph H. Merrick and Anne C. Laker
3185 W. 60th Street
Indianapolis, IN 46228
(317) 297-4905

October 13, 2002

Michael Grovak
Bernardin, Lochmueller & Assoc.
6200 Vogel Road
Evansville, IN 47715

Dear Mr. Grovak:

We are writing to register our opposition to all of the five "preferred routes" listed in the Indiana Department of Transportation's study that was released on July 31. We are opposed to these five routes for the following reasons:

1. Four of the five preferred routes would cut through the Patoka National Wildlife Refuge, which is home to numerous threatened and endangered species. We should seek to expand our nature preserves, or at least preserve them from unnecessary encroachment.

2. Four of the five preferred routes would pass too close to an Old Order Amish settlement in Daviess County. The Amish need a certain amount of distance from non-Amish encroachments in order to maintain their culture, and unlike non-Amish, the Amish have a difficult time moving to more remote locations. The State should take every step possible to prevent unnecessary encroachment upon Amish culture. 5.3

3. Indiana is already losing farmland at a prodigious rate. According to the Indiana Agricultural Statistics Service, Indiana has lost one million acres of farmland since 1990. Any of the five "preferred" routes would hasten this loss, further weakening Indiana's family farms.

4. Indiana is currently in a massive budget crisis, and simply cannot afford to spend money on a new overland route.

5. The five proposed overland routes would not result in an overall increase in southern Indiana's economic development. A new-terrain I-69 may bring some low-wage service industry jobs to towns that are fortunate enough to lie near its path, but these gains would be offset by the economic harm to the counties that Highway 41 passes through from Evansville to Terre Haute.

None of the five "preferred" routes should be adopted if there is a better alternative. Happily, there is a viable alternative: upgrade U.S. 41 and I-70. This route would preserve thousands of acres of farmland and forests, preserve Amish culture, and save a great deal of money. We respectfully ask you to consider these issues and give them greater weight than INDOT did. We also thank you for your time.

Sincerely,

Joseph H. Merrick
Anne C. Laker

1013-003

Subj: DEIS Comments
Date: 8/21/02 4:46:18 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Clarence E. Dillon
Address = 7781 West Kirksville Road
City = Bloomington
State = IN
ZIP = 47401-9534
Email = cdillon@mcswmd.org
Message = I found it suspicious when I heard tha the Amish community in the area of Epsom and Cornettsville of Davis County had been quoted not in favor of a new I-69. I had worked in the area on oil wells in the 1980,s. Very few of the junior Amish will state an opinion without the indorsment of an elder in the community. While at Raglesvill in the fall of 2001 I ask several of the Amish present about the letter they signed. Some had not signed but two that had seemed to have been informed that IDOT could put a new highway anyplace through there community. When I showed them the prefered route as from previous studies it was apparent that all but a couple Amish farms were east of the proposed route, not "cutting the Amish community in half" as represented by a Bloomington city councilman. 5.3

0821-043 Dillon, Clarence.wpd

3032 Decatur Street
West Lafayette IN 47906-1132
October 21, 2002

Senator Ron Alting
Indiana Senate
State House
200 W. Washington St.
Indianapolis IN 46204

Dear Senator Alting,

Please add my name to your list of Indiana taxpayers and voters who oppose the new-terrain I-69.

I strongly support the Common Sense I-70 and U.S. 41 route.

As an owner of farmland in Minnesota, I sympathize with the Indiana farmers and the Old Order Amish, who don't want to lose their land to an expensive, unnecessary, environmentally-destructive rip-off! 5.3

We can't eat concrete. Save our farms.

Sincerely,

Marilyn Augst

Marilyn Augst

P.S. I'm an independent voter and I vote in every election.

1021-029

September, 23 2002

Dear Mike Grovak,

I am a thirteen-year-old boy living near Wadesville IN. I am a First Class Boy Scout in Troop 390 of Wadesville. I am writing you about the I-69 project. The decision that is made will affect me and my family if the proposed western corridor is built. We are in the path of this highway.

I do understand that there are some good consequences of building I-69 but I honestly see the other side of things also. The project will create jobs for the highway construction workers who help build the roads. And it will also connect Evansville to Indianapolis with a shorter route so more people might go there to shop and visit their relatives more often. It could also bring more people to Evansville too.

But I see the other side too. It will destroy lots of land areas and habitat for animals. And it will destroy people's homes like ours. It will create lots of noise and as such will disturb our peace. It will lower land value because people do not want to live near or around an interstate or highway. And also people on the highway can see you and you do not feel like you have enough privacy in your own backyard. These things concern me and my family and how it will affect our lives. 5.3

Thank you for reading this. I would like a response sent to me at 909 Coachlite Drive, Wadesville, IN 47638. Thank you for your consideration.

Sincerely,

Jacob R. Bengert
First Class Scout
Troop 390,
Wadesville, IN

0923-006

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

STOP I-69

I live in a rather pristine 9 mile valley that extends from Owensburg In to Bloomfield In. I am very concerned about the corridors that cross just 3 mile down my county Road. I will no doubt be cut off from my county seat and relatives on the other side of you proposed right of way

I am concerned about the safety of and extra Time Travel of school busses To circumvent this obstruction. The restructur of the REMC electrical are grid cost, as power lines will not be allowed to cross this obstruct 5.3

There many caves and springs with in I-69 path in my area which will be altered. 5.23

The worse pollution threw this valley which has been considered by the Dept of air as an area having the least polluted air in Indiana.

The valley I live in is an established Department of Natural resources, designated flood ~~place~~ plain I cannot see how you can place an earthen embankment to cross this valley without violating federal law. or disturbing it NATURAL order

Name Steven D Suthard

Address RR#3 Box-15

City/State/Zip Owensburg In 47453

0927-005

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SEP 27 2002
BLA

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

I urge you to embrace US 41/I-70 as the realistic alternative to the projected new terrain I-69. Its corridors preferred routes are on average 6.5% more expensive to construct and 8% more expensive to maintain. They would divide farms, lengthen school bus routes, increase travel times, destroy thousands of acres of farmland, change forest to urban sprawl and contribute to the short fall in state funds which has already increased both gasoline and sales taxes which hit the poor & middle income the hardest! 5.3

RECEIVED
OCT 21 2002
BLA

1021-020

Name Mrs Roy E. Leake

Address 2391 N. Dunn Street

JULIA CARSON
10th District, Indiana

COMMITTEE ON
FINANCIAL SERVICES
Subcommittee on Housing and
Community Opportunity
Subcommittee on Financial Institutions &
Consumer Credit
Subcommittee on International Monetary
Policy & Trade

COMMITTEE ON
VETERANS' AFFAIRS
Subcommittee on Oversight & Investigation
Ranking Member

Internet:
http://juliacarson.house.gov

Congress of the United States
House of Representatives
Washington, DC 20515-1410

WASHINGTON OFFICE
1339 Longworth Building
Washington, DC 20515
(202) 225-4011
(202) 225-5633 Fax

DISTRICT OFFICE:
300 E. Fall Creek Pkwy N. Dr.
Suite 201
Indianapolis, IN 46205
(317) 283-6516
(317) 283-6567 Fax

E-Mail:
rep.carson@mail.house.gov

September 27, 2002

Michael Grovak
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, IN 47715

Dear Mr. Grovak:

I enclose a copy of I letter I sent today to Governor O'Bannon concerning the latest proposals to extend I-69. I send this copy to you for inclusion in the official record of comment on the project.

Thank you very much for your consideration in this matter.

Sincerely,

Julia Carson
Member of Congress

0927-004

PRINTED ON RECYCLED PAPER

JULIA CARSON
10th District, Indiana

COMMITTEE ON
FINANCIAL SERVICES
Subcommittee on Housing and
Community Opportunity
Subcommittee on Financial Institutions &
Consumer Credit
Subcommittee on International Monetary
Policy & Trade

COMMITTEE ON
VETERANS' AFFAIRS
Subcommittee on Oversight & Investigation
Ranking Member

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E-Mail:
rep.carson@mail.house.gov

September 27, 2002

Hon. Frank O'Bannon, Governor
The State of Indiana
Statehouse
Indianapolis, IN 46204

Dear Governor O'Bannon:

I write about the harms threatened by the most recent I-69 proposals. If it is wise to build the extension, I believe that these principals should control:

- *We must avoid the high cost of community damage.* Highway construction's harm to communities is considerable and this element of its cost is often undervalued. We are still recovering from the effects of the construction of I-65 and I-70 on our neighborhoods, our communities and our economy. Some of the people whose quality of life is now directly threatened moved to Decatur and Perry Townships years ago because they were displaced by those projects in other parts of town. This experience teaches us that we must avoid route choices dividing a neighborhood or community, whether to connect I-69 near Castleton through the city, or further south, in Decatur or Perry Townships, or anywhere else along its course.

- *We must protect our natural treasures.* The bounty of Indiana's natural beauty is of great value, especially as our urban areas swell and sprawl. The cost to our environment of the various route proposals must be carefully reckoned. I urge a choice which minimizes harm to forest, field and farm, to wildlife and water, to parks and recreation, one which concentrates further

PRINTED ON RECYCLED PAPER

disruption in areas which have already been disrupted, sparing others still unharmed.

- *Economic development in one part of the state must not be furthered at the expense of another.* Several of the present proposals, insofar as they impinge directly upon the economic and community life of developing portions of Indianapolis, promise dislocation which will bring real disruption to values vital to the neighborhoods involved. Along Mann Road, for example, lies Southwestway Park, soon to be second only to Eagle Creek in size in our community. The expansion of the park and its offerings has engaged amazing neighborhood investment and fundraising in a straightened economy. Several of the proposed corridors lie along Mann road and would, as one Decatur Township resident put it, create "a Berlin Wall" between the park and the people. 8.1 5.3

- *The money might be needed for other things.* In addition to community and environmental costs, the dollar cost of highways is immense. We have lately seen the return of dire deficits in the federal budget, likely to last to the decade's end and beyond, even if we keep our military engagement at present levels. Meanwhile, our own economic challenges threaten the quality of life in Indiana. In the present environment it is not at all clear that funding for this project—or many others—will be available when needed. In the straightened circumstances of our nation and our state, frugal solutions are the most intelligent, especially those which offer a useful mix of transportation options.

Since I last wrote about I-69 in August of last year, the economic picture for our nation and for our state—as for most states—has taken a dramatic turn for the worse, underscoring the importance of selecting a modest cost approach that will get the job done. Even as we experienced this trouble Indiana rejected a choice that would provide for the extended highway at the least cost in money, the least cost to the natural environment and the least cost to the human environment, the I-70/US 41 route.

I am committed to flexibility in the use of federal transportation funds to improve all forms of transportation investment for our future. I would rather Indiana have useful highways, safe bridges *and* new passenger rail assets than a single highway as costly as the current proposals. In light of where we are today as a state and a nation, as well as the impacts your present alternatives threaten, the I-70/US 40 route should be selected in order that the transportation needs of all Indiana may be better addressed.

Thank you for your careful consideration of ways to help secure a better and more appropriate path for progress than the present destructive options.

Sincerely,

Julia Carson
Member of Congress

cc: Public Comment File
Michael Grovak
Bernardin, Lochmueller & Associates,
6200 Vogel Road
Evansville, IN 47715

Brian Nicol
Commissioner, INDOT

November 6, 2002

Ms. Janice Osadczuk, Chief
Pre-Engineering & Environment Division, INDOT
Indiana Government Center North, Room N848
100 North Senate Avenue
Indianapolis, IN 46204

Dear Ms. Osadczuk,

The Indianapolis MPO is submitting herewith our comments on the Draft Environmental Impact Statement for the I-69 Extension between Indianapolis and Evansville. The MPO's comments focus only on the preferred and no-build alternatives and address primarily those areas of MPO expertise and responsibility.

The MPO's comments do not endorse any alternative. An official endorsement of any build alternative, should INDOT select a build alternative, would come from the Indianapolis Regional Transportation Council once a project is submitted for inclusion in the Indianapolis Regional Transportation Plan and Indianapolis Regional Transportation Improvement Program.

The MPO would like to thank you for the opportunity to comment on this study and will look forward to continuing coordination and cooperation as decisions are made about the future of the proposed I-69 extension. Should you have any questions regarding our comments, please feel free to call me at 327-5133.

Sincerely,

Mike Peoni, AICP, Acting Manager
Indianapolis MPO

Enclosure

Cc: file: I-69 DEIS
Mike Dearing, Indpls. MPO
Councilor Bob Cockrum
Councilor Karen Horseman
Pat Andrews, Decatur Township Civic Council

In cooperation with the Indianapolis Regional Transportation Council whose members include:

the communities of
Avon
Beech Grove
Brownsburg
Carmel
Cumberland
Fishers
Greenwood
Indianapolis
Lawrence
New Whiteland
Plainfield
Southport
Speedway
Westfield
Whiteland
Zionsville

the counties of
Boone
Hamilton
Hancock
Hendricks
Johnson
Marion
Morgan
Shelby

and these organizations
Federal Highway Administration
Federal Transit Administration
U.S. Environmental Protection Agency
Indiana Dept. of Transportation
Indiana Dept. of Environmental Management
Indianapolis Dept. of Capital Asset Management
Indianapolis Dept. of Metropolitan Development
Indianapolis Airport Authority
Indianapolis Public Transportation Corporation-IndyGo
Citizens Advisory Committee

The Indianapolis Metropolitan Planning Organization
1841 City-County Building, 200 East Washington Street
Indianapolis, Indiana 46204-3310
Phone: (317) 327-5151 Fax: (317) 327-5103

I106-129

I-69 Draft Environmental Impact Statement
Indianapolis MPO Comments

INTRODUCTION

Thank you for providing the Indianapolis MPO the opportunity to comment on the I-69 Draft Environmental Impact Statement. The MPO will limit its comments to those alternatives shown in the DEIS as being preferred, as well as the no-build alternative. Further, the MPO will confine its comments to the area within the MPA boundary and will focus its comments primarily on the regional transportation network, air quality impacts and social and environmental considerations should a build alternative be selected.

The recommendations at the conclusion of this transmittal are not intended to be an endorsement for any of the alternatives presented in the DEIS. Endorsements would come from the Indianapolis Regional Transportation Council once a project has been submitted to the MPO for inclusion in the Indianapolis Regional Transportation Plan and Indianapolis Regional Transportation Improvement Program and detailed analysis has identified impacts and recommended appropriate mitigation measures.

The Draft Environmental Impact Statement includes a total of twelve alternatives. Only five of the alternatives are considered "preferred alternatives". These "preferred alternatives" are 2C, 3B, 3C, 4B and 4C, not including the "No-build" alternative. The MPO's comments pertain only to the "preferred alternatives" listed above and are grouped into three broad categories; Network and Transportation Impacts, Air Quality Impacts and Environmental and Social Impacts.

NETWORK AND TRAFFIC IMPACTS

The traffic impacts discussed below are consistent with the level of analysis contained in the DEIS. Until detailed alignments and modeling are conducted of the regional transportation plan, only broad examination of network and traffic operations are possible.

Alternative 4B

Alternative 4B utilizes I-70 west from I-465 to a new interchange in western Morgan County where I-69 would then travel south on new alignment to an intersection with existing State Road 67 near Paragon.

Because Alternative 4B is the only alternative that would not use the SR 37 corridor, there are no network impacts associated with this alternative. Even with the increased traffic volumes projected on I-70 of roughly 10%, no changes to the regional or local network would be required. Capacity on I-70 west would be sufficient to adequately handle the increased traffic without additional changes to the network, over and above

5.8

what is already planned. It is important that close coordination occur with the planned north-south corridor in Hendricks County, the planned Six Points Road/Airport interchange and the Suburban Mobility Study when considering this alternative. 5.8

I-465

Alternative 4B, which utilizes I-70 from the west to access I-465 has the least impact on I-465, with minor increases in VMT (vehicle miles of travel) of up to 5%. All of the other alternatives that utilize the SR 37 corridor to access I-465 would have significant impacts on I-465. These range from 1% to 34% increase in VMT on I-465 between Airport Expressway and I-65.

I-70 Corridor

Alternative 4B would increase traffic on I-70 within the MPA by roughly 10%. However, the DEIS indicates that levels of service would remain acceptable.

Alternatives 2C, 3B, 3C, and 4C

Each of these alternatives includes the option of using Mann Road or SR 37 to reach I-465. The impacts to the regional and local network differ depending on which corridor is used to reach I-465.

SR 37 corridor option

This option would follow the existing SR 37 corridor into Marion County to Edgewood Avenue where it would then proceed north on new alignment to I-465 just west of the existing SR 37/Harding Street interchange. This option could have significant impacts on the local arterial street network and would require modifications to insure that the local arterial system and local circulation systems remained viable. This would presumably include existing SR 37 as a collector distributor in some fashion, collecting traffic to and from I-69 to the regional and local street network. This option does not include any interchanges north of the Marion/Johnson County line other than at I-465. Depending on the function of the C-D system along SR 37, this could be a significant concern. SR 37 plays a significant role in funneling north-south traffic to and from I-465 as well as into downtown Indianapolis. Any alternative that would disrupt this flow of traffic would have potentially significant impacts to regional travel. SR 37 also provides significant access to local residential subdivisions as well as large amounts of commercial and industrial development. 5.8

Of great importance to the regional network would be the intersection of Southport Road and SR 37. Southport Road is a cross-county primary arterial connecting I-65, SR 37, SR 67 and the proposed Six Points Road interchange with I-70. This arterial also provides the only crossing of White River south of I-465. The DEIS does not show an interchange at this location, nor does it elaborate on how the important arterial functions of these facilities will be handled. It is important to insure that either an interchange is provide at 5.8

this location or alternatives are provided that allow Southport and SR 37 to function as the important regional arterials that they are. 5.8

Also of great importance would be the maintenance of access from Harding Street to I-465. Because this option includes a new interchange west of the current I-465/Harding Street – SR 37 interchange there is concern that local access, not only to commercial establishments in the immediate vicinity, but also to Harding Street might be disrupted Harding Street is an important north-south arterial serving the industrial south side of Indianapolis, as well as the Lilly Technology Center and ultimately downtown Indianapolis. It will be critical that access to and from Harding Street and SR 37, in whatever form it may take, be maintained or improved if this option is selected. 5.8

There are also a number of important local collectors and thoroughfares that intersect with or cross SR 37 currently that would have to be maintained in order to continue to serve the developed and developing commercial, industrial and residential areas along the SR 37 corridor. Thoroughfares include Thompson Road, Edgewood Avenue, Stop 11 (proposed connection to SR 37) and County Line Road. Important local collector streets include Epler Avenue, Banta Road and Wicker Road. In addition, Belmont Avenue runs parallel to SR 37 between Southport Road and Epler Avenue, providing access to local development west of SR 37. 5.8

Another important consideration is the intersection of Bluff Road with SR 37. Bluff Road is an important primary arterial that runs from near downtown Indianapolis southwest to an intersection with SR 37 just north of the Marion/Johnson County line. Bluff Road not only serves as an important regional arterial for residential development in Marion County, but it also provides an alternative corridor for commuters to and from downtown Indianapolis. It will be important to maintain access to Bluff Road regardless of which build alternative might be selected. 5.8

Mann Road corridor option

The second possible option would include a new terrain route through relatively undeveloped agricultural land to an intersection with Mann Road at the Morgan/Marion County line. This option would then run north roughly along Mann Road to a proposed interchange at Southport Road. A proposed interchange with I-465 would be located at the existing Mann Road interchange with I-465. The existing interchange would have to be reconfigured to accommodate interstate to interstate traffic.

This option could have significant impacts on the local arterial street network and would require modifications to ensure that the local arterial system and local circulation systems remained viable. It is unlikely that Mann Road would exist in its current form and thus significant changes to local access and commuting patterns would result. Mann Road is a primary arterial running from its intersection with Kentucky Avenue north of I-465 south well into Morgan County. While Mann Road functionally is not as important to the regional transportation network as SR 67 to the west and SR 37 to the east, it is an 5.8

important corridor for distribution of trips into and out of Marion County, as well as for localized travel within Decatur Township. 5.8

The DEIS indicates that this option would have an interchange at Southport Road. Southport Road is an important east-west cross-county primary arterial. It is important that primary arterials feed the interstate system, particularly Southport Road in that there are no other east-west primary arterials in Decatur Township. There are however, secondary arterials that connect to Mann Road that would potentially be limited by the presence of an interstate highway in this corridor. Those arterials are Thompson Road, Milhouse Road and Ralston Road.

Of most concern to the MPO would be the interchange at I-465, if the Mann Road option were selected. This interchange as it currently exists is only a partial interchange with ramps to and from the east. This is due primarily to its close proximity to the interchange just west of Mann Road at SR 67/Kentucky Avenue. The interchange at SR 67/Kentucky Avenue is limited due to its close proximity to the I-70/I-465 interchange and the presence of a railroad corridor parallel to SR 67 which further limits the flexibility of this interchange. Significant changes at the Mann Road interchange made to accommodate interstate to interstate traffic could have significant impacts on the SR 67/Kentucky Avenue interchange and possibly the I-465/I-70 interchange. Because these three interchanges would be so closely linked and could significantly impact one another the MPO would require additional detailed study of how these three interchanges interrelate in the context of the improvements currently being developed to relocate and lower I-70, as well as those related to the new mid-field terminal interchange. The efficient operation of these two down stream interchanges related to access to the airport is paramount in importance to the MPO and the entire region. 5.8

I-465

The current Indianapolis Regional Transportation Plan (IRTP)includes a proposed improvement to I-465 from the Airport Expressway to I-65. The specific improvements between Airport Expressway and SR 67 are being determined by INDOT as part of the planned widening of the west leg of I-465. It is not clear from the DEIS if these improvements were taken into consideration and if so, what level of service would result. Between SR 67 and I-65 the IRTP proposes a widening from 6 to 8 lanes. If a build alternative were selected that utilizes either Mann Road or SR 37, the DEIS indicates that I-465 would have to be widened to 10 lanes to adequately accommodate the projected increases in traffic.

The impact of the I-69 extension on the southeast, east and northeast sides of I-465 is not specifically mentioned in the DEIS. Additional detailed analysis would need to be undertaken before specific impacts to other parts of the regional system could be determined.

SR 37 Corridor

Those alternatives that utilize the SR 37 corridor, increase VMT on the corridor by significant amounts. Increases in VMT in the SR 37 corridor range from 2% with Alternative 2C to 355% with alternative 3C. It is important to note however, that these increases do not necessarily translate into poor levels of service since interstate highways can carry significantly more traffic than local or regional arterial streets. Each alternative assumed the number of lanes necessary for the new interstate to maintain an acceptable level of service. Eight travel lanes would be required from SR 144 to I-465.

I-65 Corridor

A new north-south interstate highway from I-465 south roughly parallel to the I-65 corridor could result in some diversion of traffic away from I-65. The DEIS indicates the diversion of traffic is relatively insignificant. Decreases in traffic on I-65 from I-465 south to the County Line Road interchange would be in the range of 3% to 4% for those alternatives that make use of the SR 37 corridor.

I-70 Corridor

Four of the five alternatives utilize the SR 37 corridor in some fashion. As a result, traffic would be diverted from I-70 west of I-465 in the range of 18% to 26%. Conversely, alternative 4B which utilizes I-70 from western Morgan County to I-465 would increase traffic on I-70 within the MPA by roughly 10%. However, the DEIS indicates that levels of service would remain acceptable.

AIR QUALITY IMPACTS

Marion County is classified as a maintenance area for the ozone pollutant. As such, capacity expansion projects considered "regionally significant" proposed within the MPA must be analyzed using an approved methodology and computer model developed by the US EPA. The model measures the amount of pollutants that will be emitted as a result of implementing a project. The emissions cannot exceed the emissions budget specified in the State Implementation Plan (SIP) and the Indianapolis-Marion County Redesignation Maintenance Plan. Further, "regionally significant" projects must be included in a Regional Transportation Plan and Transportation Improvement Program that have undergone a conformity determination.

One of the primary objectives of the air quality analysis in the DEIS, is to identify any alternatives that would have a high likelihood of placing conformity status in Marion County in jeopardy. Final conformity of a preferred alternative would be determined in the Final EIS.

Alternative 4B

According to the analysis in the DEIS, of the preferred alternatives, 4B increases emissions in both VOC and CO the most over that of the no-build alternative. Emission rates per Vehicle Miles of Travel (VMT) for VOC and CO increase as one moves from the highest to lowest roadway functional classifications. Because Alternative 4B does 5.9

not propose additional interstate facilities, it is logical to expect this increase. It is important to note however, that even with the increases in VOC and CO, the SIP budgets are not exceeded with this alternative. 5.9

Alternatives 2C, 3B, 3C, and 4C

All alternatives other than the no-build increase VMT in the MPA. This results in changes in the emissions over that of the no-build alternative. In this case, the no-build alternative would be the Indianapolis Regional Transportation Plan. Alternative 3B increases NOX emissions the most over that of the no-build alternative. The DEIS concludes that "Because all alternatives fall under the SIP emissions budgets when added to the Indianapolis Long-Range Transportation Plan, the addition of any alternative to the Long-Range Transportation Plan would not jeopardize conformity with the SIP". However, analysis conducted by the MPO at the request of Bernardin-Lochmueller & Associates of a worst case scenario that utilizes SR 37 to I-465 shows NOX emissions would be exceeded in the 2025 time period. Therefore, further detailed examination of these alternatives is recommended before the project can proceed as proposed. 5.9

It is important to note again, that until a more detailed alignment is determined and a project is proposed for inclusion in the Indianapolis Regional Transportation Plan and TIP, a conformity determination cannot be made.

ENVIRONMENTAL AND SOCIAL IMPACTS

Alternative 4B

Because Alternative 4B does not include any new transportation facilities within the Indianapolis MPA, the environmental and social impacts would be minimal. The increase in traffic could result in increases of highway noise along existing interstates I-70 and I-465 within the MPA. However, these noise impacts will be examined and where appropriate mitigated as a part of already planned and in some cases programmed improvements to these facilities. Further, since traffic generated by Alternative 4B would be accommodated by existing facilities and improvements already in the Indianapolis Regional Transportation Plan, no additional environmental or social impacts would be anticipated over and above what is assumed in the Plan. 5.3

Alternative 4B does not require the relocation of any homes or businesses within the MPA, nor does it impact park land, historic properties or wellfield areas over and above those improvements already planned along this route.

Alternatives 2C, 3B, 3C, and 4C

Any of the above alternatives will have environmental and social impacts within the Indianapolis MPA depending on which corridor option is used to access I-465. The option that utilizes SR 37 north into Marion County at Edgewood Avenue would utilize a well established major transportation corridor, where as the Mann Road option would 5.3

develop an interstate highway along a two-lane rural and low density suburban corridor. The current and future land uses along the SR 37 corridor tend to be more appropriate for a major transportation facility where as those along the Mann Road corridor are less compatible. 5.3

Alternative 4C requires the lowest possible number of relocations in the Indianapolis MPA, with 114 to 181, where as the remaining three alternatives (2C, 3B, 3C) require 139 to 230 relocations.

All of these alternatives include the option of using the Mann Road corridor to access I-465. Use of this corridor would also impact several historic properties and churches.

Mann Road option

The Mann Road option would pass through largely rural and lightly developed suburban areas, thus changing not only the character of the community, but potentially changing the land use patterns in this portion of the community. The Marion County Comprehensive Land Use Plan for Decatur Township recommends a continuation of very low density residential land uses along the Mann Road corridor, with only small neighborhood commercial uses at a few select intersections.

There are also a number of parks existing or recommended along the corridor that could be impacted. Of special note is Southwestway Park south and east of the intersection of Mann Road and Southport Road. This park is one of few park areas in Decatur Township and was just recently doubled in size through significant efforts of local citizens, Indy Parks and developers to make it second in size only to Eagle Creek Park in northwest Marion County. The Mann Road option would potentially impact this park due to corridor right-of-way needs, as well as additional right-of-way needed to accommodate the proposed interchange at Southport Road. 8.1

SR 37option

The SR 37 corridor, already utilizes a developed transportation corridor bordered by land uses more appropriate for a high end transportation facility. SR 37 utilizes an existing expressway corridor that passes through a more urbanized area of MPA

The Comprehensive Plan for Perry Township, recommends a mixture of light industrial, commercial and medium to low density residential along the SR 37 corridor. Most of these are land uses that are generally more compatible with a major transportation facility. This corridor has also developed in the presence of an existing expressway and has developed in some cases, more densely than recommended by the Comprehensive Plan with additional multi-family developments, as well as significant commercial developments. Nevertheless, this alternative would require the relocation of 139 to 208 residences and businesses. Several historic structures and churches could also be impacted.

It is important as well, to note that existing SR 37 passes through a protected wellfield area. Any alternative that utilizes SR 37 would increase the likelihood of further impacts to this wellfield area.

Noise impacts could be significant given the number and density of residential units existing and planned along SR 37.

RECOMMENDATIONS

The MPO recommends that if a build alternative is deemed necessary, that Alternative 4B that utilizes I-70 from I-465 west to western Morgan County and then south, be selected. Should any of the other build alternatives be selected, the MPO would recommend that the Mann Road corridor option be eliminated from consideration. 6.2

The MPO recommends that if a build alternative is deemed necessary, that it not compete with I-465 and other important state facilities in the MPA for limited funding.

The MPO recommends that if a build alternative is deemed necessary, additional detailed analysis in close cooperation with the MPO to insure that the MPA's transportation network and air quality status are not jeopardized and that all quality of life impacts are appropriately addressed.

The MPO's recommendation is based on the following considerations:

- The no-build alternative and alternative 4B have the least impact on the region's transportation network, particularly I-465. All of the remaining preferred alternatives have potentially significant impacts to the regional transportation network. The impacts range from potential impacts to interchanges important to efficient access to the new mid-field terminal, significant local access impacts along SR 37, to the need for additional travel lanes on I-465 over and above what is currently shown in the Indianapolis Regional Transportation Plan.

- All alternatives other than the no-build increase VMT in the MPA and thus increase emissions over those of the no-build alternative. Based on the information contained in the DEIS, non of the alternatives exceed the State Implementation Plan emission budgets.

- Alternative 4B does not require the relocation of any homes or businesses within the MPA. Of the other build alternatives, Alternative 4C requires the lowest possible number of relocations in the Indianapolis MPA, with 114 to 181 where as the remaining three alternatives (2C, 3B, 3C) require 139 to 230 relocations.

- All of the build alternatives would result in varying degrees of travel time savings between Indianapolis and Evansville. Alternative 4B results in a travel time savings of 27 minutes. Alternative 2C realizes the least travel time savings at 19 minutes, where as Alternative 3B would realize the most at 29 minutes.

- Alternative 4B does not impact park land, historic properties or wellfield areas over and above those improvements already planned along this route. All of the other build alternatives impact park land, historic properties and wellfield areas.

STATE OF INDIANA
HOUSE OF REPRESENTATIVES
THIRD FLOOR STATE HOUSE
INDIANAPOLIS, INDIANA 46204

ROBERT W. BEHNING
3315 S. TIBBS AVENUE
INDIANAPOLIS, IN 46221
WEBSITE: WWW.IN.GOV/H91

COMMITTEES:
EDUCATION, R.R.M.
ELECTIONS AND APPORTIONMENT, REDISTRICTING CHAIRMAN
COMMERCE, ECONOMIC DEVELOPMENT AND TECHNOLOGY

September 11, 2002

Mr. Brian Nichol, Commissioner
Indiana Department of Transportation
Indiana Government Center North, Room N755
100 N. Senate Avenue
Indianapolis, IN 46204

Dear Commissioner Nichol,

Thank you for attending the meeting of the Decatur Civic Council. As you witnessed, the I-69 project has generated a great deal of interest and frustration across Indiana. Decatur Township residents are particularly concerned about options that incorporate Mann Road.

As you will recall, many concerns about the Mann Road route were expressed at the meeting. These concerns include easement and eminent domain issues as well as the potentially negative effect this route would have upon the community.

I-69 is needed. However, I am puzzled that Mann Road is being considered. Mann Road is home to a variety of relatively new housing developments. The impact on local residents would also be significant. Besides displacing several homeowners, this route would have a negative impact on property value in this residential area. The cost of acquisition of these homes and land is also likely be substantial. 5.3

I agree with many of the sentiments expressed at the meeting. This is not the place for a highway. The local impact is far too high, particularly when a better alternative exists nearby. Please remember, Decatur Township is also home to the large and constantly expanding Indianapolis International Airport. The I-69 Mann road option would place an even greater transportation burden on the residents of Decatur Township. Surely these residents have endured enough traffic, noise and construction. Let's not add another major project to the mix.

The US-70 to US-41 option seems far more reasonable. I-70 is already a fully developed interstate. Only US-41 would need to be upgraded. This route would seem to reduce both cost and disruptions to the local communities. I encourage you to strongly consider this option.

Frankly, I am surprised that we have only heard of this option recently. The I-69 project has been contemplated for some time. It is troublesome that, until recently, so little was known about the prominence of the Mann Road option. Local residents feel blind sided by the belated publicity of this route.

Thank you for your consideration. Please keep me informed as the discussion of this route progresses.

Sincerely,

Robert W. Behning
State Representative

0911-050

RWB:MB\bn

THE COUNCIL
CITY OF INDIANAPOLIS
MARION COUNTY

BOB COCKRUM
Councillor, District 19

November 1, 2002

Mr. J. Bryan Nicol, Commissioner
Indiana Department of Transportation (INDOT)
100 North Senate Avenue
Indianapolis, IN 46204

Dear Commissioner Nicol:

I am writing this letter to identify several concerns related to the potential routing of I-69 into Marion County via the "Mann Road Option."

I previously provided my initial five concerns verbally at the INDOT Public Meeting in Terre Haute on August 19, 2002. Those concerns were restated at the Decatur Township Civic Council meeting on September 9, 2002. Attached is a copy of those comments.

Since then there has been a negotiated agreement to buy the 101 acres of Park Land along White River. Since the land purchase includes funding from the Federal Land & Water Conservation funds, any acquisition by INDOT for the Southport Road interchange will require a "6F Conversion." That compels parkland replacement of equal or better land. 8.5

After a more detailed review of the 2000 feet Corridor, as related to the Soccer Complex, it appears that it might be possible to route I-69 to the west edge of the Mann Road corridor and avoid relocation of the Soccer Complex.

Several other concerns, however, have been identified as a result of more recent discussions with representatives of various Government Agencies and/or private businesses. These added concerns include:

There is the potential for contamination of water company wells due to accidental spills. There are three water companies operating wells in the White River area. The Indianapolis Water Works has several wells on the east side of the river just south of Southport Road providing water to Indianapolis. The Indiana American Water Company provides water to the communities of Greenwood, Franklin, Whiteland, and New Whiteland. Their wells are on the west side of the river just east of Mann Road. Mann Road is within the five-year capture zone (3,000 feet) Well Head Protection area. The third company is Bargersville Utilities. Their current wells are on the east side of the river, however they recently bought 37 acres for future wells on the west side of the river in the area of HWY 144 and Smokey Road. I have discussed this issue with representatives of all three companies and the Indiana Department of Environmental Management. They all expressed varying levels of concern about potential contamination of the wells. However, none of them dismissed this as "no concern." In discussions with a Highway Consultant Engineer, I was advised that some type of special drainage system would be required to protect the wells. 5.24

There is a concern about Highway noise as related to residential areas along Mann Road. I have discussed this issue with a representative of the Indianapolis 5.10

1101-018

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Metropolitan Planning Organization and obtained a copy of INDOT's Highway Traffic Noise Policy. I understand a Traffic Noise study will be required, and if necessary Noise Barriers of up to 16 feet high might be required. In discussion with the Highway Consulting Engineer, I was advised that INDOT has constructed very few such Noise Barriers. Most, if not all, of the Noise Barriers along Interstates in Marion County have been constructed by property owners. 5.10

There is an old historical cemetery, known as Beeler-Marrs Cemetery located at 5100 Mann Road. This is just south of I-465. We do not want to relocate that Cemetery.

The Mt. Pleasant Baptist Church located at 6341 Mann Road is in the 2000 feet corridor. Their cemetery is across Mann Road on the south side of Mills Road. They do not wish to relocate.

The 2000 feet corridor goes through the 604 acre Lugar Farm, which includes approximately 159 acres designated as Indiana Classified Forest Land Program.

The Mann Road option will require construction of a bridge over White River in Morgan County. This is a major cost that could be avoided with other options.

The proposed Mann Road Corridor will tend to isolate the second largest City Park in Marion County, Southwest Way Park, from the public. Federal, State, and City governments have worked together to acquire this property to provide park amenities for the residents. We are advised by City Park Planners that there is not another location in Marion County that could provide the options that this park provides. 5.3

I hope that your consideration of our concerns will lead to the selection of an option other than Mann Road.

Sincerely,

Bob Cockrum

Bob Cockrum, District 19
City-County Councilor

Attachment

I-69 PUBLIC HEARING
AUGUST 19, 2002
TERRE HAUTE, IN

Councillor Bob Cockrum, following the presentation, made the following public comments:

"I have five comments which are applicable to the Mann Road Alternate in Marion County.

First, the current interchange at Mann Road and I-465 is a half interchange. The State has said that it should not be converted to a full interchange because of a safety problem of crossing traffic as it relates to the Hwy 67 interchange.

Second, if the Mann Road & I-465 interchange is converted to an I-69 & I-465 interchange, I assume local traffic would be prohibited from use. This will result in an increase in the use of the I-465 & Hwy 67 interchange. That interchange is already one of the worst in the State.

Third, the City of Indianapolis is on the verge of buying 101 acres along White River, West side, south of Southport Road to expand Southwest Way Park. Acquisition includes a State grant of $150,000 from the Heritage Trust Fund, a Federal grant of $200,000 from the Land and Water Conservation Fund, a City appropriation of $250,000, and Indianapolis Parks Foundation is raising $400,000. (Approximately $300,000 has been raised since June 2002). Many people will be unhappy if this property is taken for the I-69 project.

Fourth, The Historical Society has participated in rehabilitation of an old house located on the Northwest corner of Mann Road and Southport Road. They will also be unhappy.

Fifth, the proposed Alternate would require relocation of the Soccer complex on the West side of Mann Road, which is a part of the current Southwest Way Park. The current number one concern of residents in Decatur Township is the lack of adequate park facilities."

Subj: New I-69 Study Form Feedback
Date: 11/7/02 6:05:10 PM EST
From: hoffma@indiana.edu (Joseph L. Hoffmann)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Joseph L. Hoffmann
402 S. Reisner
Bloomington, IN 47401

Message:
Dear Mr. Nicol and INDOT -- I am a resident of Bloomington, a Member of the Bloomington Board of Parks Commissioners, and a longtime (more than 10 years) Member of the Bloomington Plan Commission. As such, I have strong and hopefully well-informed views about issues relating to land use and development in Bloomington.
I neither support nor oppose the construction of a new interstate-grade highway (I-69) through Indiana from Indianapolis to Evansville. On this general issue, I know that there are strong arguments in both directions, and I think that the existance of such a new highway should be based on the costs and benefits to the entire state, not just to one region or town.
But I do believe that it would be seriously detrimental to the overall welfare of Bloomington and Monroe County for such a new highway to be built along the current path of Indiana Route 37 on the west side of Bloomington. My reasons for feeling this way include:
(1) the fact that an interstate-grade highway would require closure of several east-west roads that are used by many persons in my community for commuting and other purposes;
(2) the fact that such a highway would undoubtedly generate intense development pressure along the highway corridor, leading to increased local traffic and further complicating cross-town and cross-county travel; 5.8
(3) the fact that such a highway would have a more limited number of access points than the existing Indiana Route 37, thus making local north-south travel also more difficult; and
(4) the fact that such a highway would physically and psychologically cut off the western end of Bloomington, and the western half of Monroe County (including, for example, the county fairgrounds, the county airport, and the main county park, not to mention many residents), from the rest of the city and county. 5.3
If I-69 can be built somewhere relatively close to Bloomington (in order to serve the many Hoosiers who want better access to Bloomington), but not actually THROUGH Bloomington (as in the case of the existing Indiana Route 37 alternatives), these negative impacts would be greatly reduced or even eliminated.
If I-69 is to be built, therefore, I encourage you to consider, and adopt, one of the proposed routes that would NOT use the path of existing Indiana Route 37 to traverse Monroe County. Thank you for your consideration.
-- Joseph L. Hoffmann
P.S. -- If I-69 IS built along existing Indiana 37, I will, of course, use all of my influence as a Plan Commissioner to try to prevent the overdevelopment of the I-69 corridor and thereby limit the negative impacts about which I am concerned. But many of the above negative impacts will, I am sure, be unavoidable...

1107-187 Hoffman, Joseph.wpd

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

Here are my comments.

1. Residents of Monroe County do not want any interstate running through our beautiful countryside.

2. The millions of dollars is an outrage and taxpayers money should not be used to cover our fields and countryside with pavement. Update present highways.

3. Monroe County definitely wants no part of the ongoing noise and rumble of millions of car and especially semi truck traffic day and night.

4. Bloomington is a unique town that attracks seniors, students and visitors because of the off-the-fast-track location and serenity and beauty of this area which would be ruined by interstate noise, fumes, dust, traffic and transients. 5.3

5. The years of construction would disrupt present traffic.
6. The Amish and farmers would lose their beloved property and way of life.
7. All the above for a fast drive between Evansville & Indp. that might save 15 minutes of time is NOT the right thing to do. It's unwise and stupid & a waste of taxpayers money.

1021-021

Name Mrs. Karen Johnston

Address 4164 Grand Avenue

City/State/Zip Bloomington Indiana 47404

RECEIVED
OCT 21 2002
BLA

September 13, 2002

J. Brian Nichol
Commissioner
Indiana Department of Transportation
100 N. Senate Ave.
Indianapolis, IN 46202

Dear Mr. Nichol,

My wife and I bought 30 acres that are either on or very, very near the proposed route 3B in the Maryland Ridge community in eastern Greene County. This area is a beautiful community with many old farming homesteads that were established long ago, and still are occupied by many of the same families today. Obviously, I am opposed to the interstate coming through our property and community. We just closed on our land a year ago with the hopes and dreams of building a home in about 2 years. In this home we would raise our children and live through retirement.

You made the statement that the 2nd tier study would take at least 18 months and possibly up to 5 years to complete. We are buying this property on contract from the owners. If the decision is made to go through this area (route 3B), we will not be able to sell our land to anyone, nor will we really want to put time and effort into building a home on it. I would like to know what are we supposed to do? We will have to continue paying on the land that we will really not be able to use until the state does something. Because of this potential 5-year wait, we will not be able to "move on" and begin the whole task of looking for something else because we won't be able to afford anything if we find it. By the way, it took us 2 years of looking to find the land we now have. I realize that there are probably a lot of people bothering you about many of these things. But I really don't know where else to get the answers. 5.3

You made the statement in the Bloomington newspaper that the decision will be ultimately up to the government and INDOT and that the people's concerns will be considered, but will not really factor much in the outcome. I hope that I interpreted that wrong. But if not, please consider this a plea to you to not only weigh the benefits of running through route 3B, but also the costs of it. It will be the most expensive (we are in a budget crisis – right?), it has the most opposition, it will put many families in a holding pattern for up to 5 years, it will destroy lots of fresh forest – farmland – and homes, it will destroy a historic community, it will travel directly over some of the most karst area in the state – costing much more $ to fortify the roads and in-turn ruin the natural caves, it will negatively impact the endangered Indiana brown bat, and it will ruin the dreams my wife and I had of raising our children in this peaceful and quiet part of Greene County and of having this homestead through retirement. It's true that it will save time – around 14 minutes versus the Terre Haute route. But how does a highway equate to good paying jobs suddenly appearing? In Bloomington we have a good highway (SR37), but the good paying factory jobs have been leaving the area for a while (RCA, GE, Otis, Westinghouse). $1.8 billion dollars is a lot of money. Would that money not be better spent towards building new hospitals, education, or simply improving our existing roads?

0913-031

I realize that you are not in charge of hospitals or education, but you must agree that those 2 are more important than saving 12-14 minutes of driving time.

Lastly, the US constitution says something about the citizens having the right to the pursuit of happiness. This interstate coming through my future home and the homes of this community would basically defy the constitution. Please, please select the route along I70 and 41. It's the least costly, Terre Haute wants it, if you raise the speed limits – time will be made up, and who knows..... by the time the interstate is actually completed, our better performing engines will pollute less and less and actually achieve better mileage.

Thank you for your time,

David Abram
Maryland Ridge Community member

Cc: James Juricic; John R. Baxter; Robert R. Dirks; Linda Weintraut; Larry Heil; Matt Fuller; Tommy Kleckner; John Goss; Betsy Merrit

From: Nancy Winningham [mailto:nancyw@bluemarble.net]
Sent: Monday, November 04, 2002 3:22 PM
To: indot@ai.org
Subject: New terrain I-69 comment

Regarding the proposed new terrain I-69 extension:

I want to say up front that my property is not in the direct line of any of the routes, although some routes go nearby. So I'm not one of the "don't touch my house!" single-issue people. Instead, I have these comments about how the various routes are likely to impact communities as a whole.

TRAFFIC PATTERNS

(1) If the route 3A or 3B near Bloomington goes through (or the route planned parallel to State Road 231 near Spencer in Owen County, the number of which I have forgotten), there will be hardships on local people. It will be even more difficult than it is now to get to essential services such as a hospital, grocery store, doctor, etc. By putting ht highway between where country people live and their jobs, schools, and doctors, it becomes a daily (or at least 2-3 times a week) hassle just to get around to necessary places.

(2) Have you ever driven on State Road 43 between Spencer and State Road 48? If so, you would never have suggested an intersection near where SR 43 and SR 48 come together. That would encourage truck drivers to use SR 43--one of the most twisted and hilly and dangerous state highways in Indiana! Although the route has been improved through the hamlet of Whitehall, the bulk of this route has right-angled turn, odd curves in other areas, and is horribly dangerous in icy weather. Not a highway you would want to INCREASE traffic on. 5.8

(3) Some of the proposed routes cut right through the middle of school districts. With the overpasses being planned for only about every 10 to 20 miles, this would be a nightmare for routing daily school bus traffic. The roads in the back areas are often ALREADY too narrow for a school bus and a pickup truck to pass one another. If the children have to take an even longer and more convoluted route daily, then the danger factor for them increases. And have you ever tried t do a school bus turn around in a muddy driveway in bad weather? Think about that when creating so many dead-end roads. 5.8

(4) What about the response time for ambulance, fire, and police? Also likely to increase significantly with so many dead-end roads. A hazard to public safety, if you ask me.

(5) Have you also looked at how the new terrain highway, creating dozens (and I mean that literally, dozens) of new dead-end roads, will impact mail service? Almost all the rural mail carrier routes will have to be redesigned, and will take longer, causing increased expense to the U.S. Postal Service on a daily basis.

RURAL ROAD MAINTENANCE

The maintenance of our rural roads in in a terrible condition already. Anyone who lives or drives a delivery truck in Indiana's outback can tell you that car-swallowing potholes are much too plentiful. An extremely expensive new highway, that will benefit only big business (be honest, that's what this is all about) will siphon money away from taking care of existing roads, big and small, throughout Indiana.

DISLOCATED PEOPLE

With the proposed new terrain I-69, there are literally hundreds of families which will be displaced. "But they will get fair market value for their homes." True enough. But what will "fair market value" buy to compare to what they have lost? Simple supply and demand comes into play here. With (let's say) 100 homes gone to make room for the highway, there will be 100 families looking for another place to live. Since there are likely to be fewer homes than that available in the original price range of those families, they will be forced either to get something a lot less nice than what they had, or pay a lot more than they had before. This is a negative impact on virtually everyone who is in the way of the proposed project. 5.3

Think about your own home. In Indiana, even Indianapolis, the housing market is much different than in (let's say) San Francisco or Boston or Seattle. Take the appraised price of your own home or apartment, go on the internet, and house shop in one of those cities. You will be amazed at how little you could get for the same price in those markets.

This is the situation for the people who would be displaced from little places like Hendricksville, or a out-of-the-way house in a holler in the woods. Their homes don't appraise for much, primarily because of the location. If the families have to go to find housing in a bigger town, like Bloomington, Bedford, or Spencer, they will be spending a lot more money for the same size home.

But there are intangibles that will be lost--and once lost, likely never to be seen again. My property is similar to some of those affected. I live in a rundown little farmhouse, but we have nearly two acres, butting up to the neighbor's hayfield and a hillside that is the most glorious show of nature in all seasons. We get deer eating in the vegetable garden, and coyotes calling to one another on clear nights. The little creek that runs along the edge has rare flowers on its banks--Virginia bluebells and trilliums. If properties like this are sacrificed to making the Indianapolis/Evansville trip an hour shorter, what have all of us, for all future generations, lost? And will it be worth the price?

Both the city council of Terre Haute and the city council of Bloomington have recommended the I-70 to SR 41 route. I think that this route, being the cheapest to build and having the least social impact, is the proper decision.

Respectfully submitted,
Nancy Winningham
9998 West State Road 43
Bloomington, IN 47404
(812) 322-7043
nancyw@bluemarble.net

1104-037 Winningham, Nancy.wpd

PUBLIC HEARING COMMENTS

Jack Gilmer... You can't get there from here. I've heard that all my life. I grew up in Indianapolis and they said that about Evansville. I live in Evansville and they say that about Indianapolis. I am in favor of the direct route to Indianapolis from Evansville. Because one..... Evansville is the third largest metropolitan area in the State and I'd like to venture to say that it is the second largest if you included the tri-state area which includes Henderson and Southeastern Illinois. The reason why I'm in favor of a direct route, is because I did an informal trip..... I make the trip all the time, I still have family in Indianapolis. My 11 year old daughter and I made an informal study on the way back Sunday, we started at Terre Haute and until we got to I-64 south of Princeton. We counted every curve cut along the path through highway 41. Guess how many curve cuts we have, and this is businesses, streets and personal driveways that adjoin interstate or highway 41.....571 curve cuts. Now 41 is not any where close to interstate quality, you are going to disrupt over 600 maybe a 1000 families and businesses by updating that highway. The only choice, the only alternative is a direct route. Thank you very much. 5.3

0821-214 Gilmer, Jack.wpd

Subj: DEIS Comments
Date: 11/3/02 6:39:20 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Roger Johanningsmeier
Address = 12115 N. Freelandville Rd.
City = Edwardsport
State = IN
ZIP = 47528
Email = rogerjmeier@earthlink.net
Message = I would strongly urge that Alt 2 of the I-69 Indianapolis to Evansville route not be used. Alt 2 would seriously disrupt our farming operation and the lives of our family. The proposed Alt 2 route would cross through our home and farm and destroy all we have worked for our entire lives. 5.3

1103-006 Johanningsmeier, Roger.wpd

Subj: DEIS Comments
Date: 11/4/02 12:49:38 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Tracy S. Noel
Address = 8449 N. Fox Hollow Road
City = Bloomington
State = IN
ZIP = 47408
Email = tktil@aol.com
Message = The United Pentecostal Assemble is a church family of approximately 250 people sitting in the 1000 foot corridor of a proposed I69 route using exisitng Highway 37.We are currently in a 1.5 million dollar building project and have concerns about the I69 project taking our land and our new church! We do not want this to happen!!
If one of the routes using Highway 37 is chosen and it would affect the area where our church is located, we have several questions There is some vacant property on the opposite side of Highway 37 (across from the church)Would this property be considered before our church property - also we are very concerned about access to the new Highway - closing Fox Hollow Road is proposed - we need EASY on & off access for our members and our expected future growth.(We are considering our senior saints as well as young drivers who would be using this entrance/exit several times a week) Where and how would this access tie in to I69? 5.3
Please consider that our church has stood on this site for over 50 years - we do not want it to go to the I69 project!
Sincerely
Pastor Tracy S. Noel & the Saints of the
United Pentecostal Assembly
Bloomington, In 47408

1104-012 Noel, Tracy.wpd

Subj: DEIS Comments
Date: 11/7/02 3:33:17 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Herbert Hochreiter
Address = 6369 South County Road 725 East
City = Plainfield
State = IN
ZIP = IN
Email = hhochreiter@webtv.net
Message = If I-69 is to be built between Indianapolis and Evansville alternative 1 which is I-70 and US 41 should be used. Routes near Martinsville and Bloomington should not be used.

Preservaton of the long term habitability of Earth requires a shift from population growth and development and a shift toward population decrease and preservation of undeveloped spaces. I-69 extension between Indianapolis and Evansville will facilitate drug smuggling from Mexico and the movement of terrorists from Canada. 5.3

The I-69 extension which should be built is the portion between the northeast corner of I-465 and the inner loop in downtown Indianapolis. The aforementioned extension would relieve congestion on the northeast portion of I-465.

1107-118 Hochreiter, Herbert.wpd

Highway to Crime?

I-69 connecting Detroit to Mexico sounds like a drug freeway through the heart of Indiana - with a stop in Bloomington, a prim target for drug dealers. I-69 through Bloomington would not just bring more business, it would bring with it an increased crime rate. Bloomington has already experienced increased serious crimes as a result of Detroit drug connections. Why make it any easier? 5.3

Many people measure quality of life by increased incomes, better cars bigger homes. These people should consider moving closer to the city. Quality of life to me is measured by clean air, clean water, natural peaceful surroundings and safe neighborhoods. I-69 through Bloomington may mean more income, but it also means more pollution, less trees and a serious increase in crime, diminishing the quality of life in our unique and wonderful community.

Joanne Shank

Joanne Shank

1021-030

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW. USE THE REVERSE SIDE, IF NECESSARY.

I am not convinced that I-69 will achieve the people's goal. This is a large, costly project which will gobble up land and waste taxpayers' money, all for the sake of political gain. In the wake of such scandals involving Clinton and Enron, it seems we have lost our trust in the economy, our leaders, and large corporations, not to mention big government, which has a nasty habit of supporting political allies with gift money via our checkbooks. Such alliances with big road construction are no exception. We have been force-fed propaganda that uses deception and half-truths to convince us of the "greater cause." In reality, the people's greater cause is something quite different, indeed. Market trend analysis has shown that, in the aftermath of September 11, people have shifted their focus to their homes, the only sound investment they can safely make in this economy. They pour whatever hope they have into their homes, families, and way of life. I-69 cuts through these like a knife, threatening to use our neighborhoods as the sacrificial lambs. 5.3

We have been given false promises of a highway that will spur on economic growth and enrich job opportunities. Politicians know this is what we want to hear, but it is nothing but sweet music. They want us to believe this highway will lead to silver and gold. However, it is the big road construction companies that will find buried treasure. What taxpayers will find instead are fast food jobs at truck stops that pay minimum wages and a few gas stations in-between. This is what one typically finds along interstate highways.

The Rolls Royce plan Bernardin-Lochmueller is pushing for is full of holes. First of all, extensive work that is already underway for improvements along Route 46 will have to be torn up and reconfigured all over again to conform to their master plan—a blatant waste of our money. Big road construction companies will be the only ones singing their way to the banks. Secondly, the very thought of spending $.5 billion (today's money) to save 10 minutes of driving time is ludicrous. Personally, I have no sympathy for people who cannot seem to make it to work on time. Perhaps they should set their alarms and leave 10 minutes earlier. This plan also calls for churches, homes, and a high school destroyed, businesses trampled, and forests hacked away, all so we can get some cheap goods from Mexico to Canada. It is as if progress is a blind running bull. What is not being emphasized is that we, ourselves, will have to dig deeper into our wallets every time we fill up at the pump, today and many years down the road. And perhaps this is when the music no longer sounds so sweet. 5.12

Victoria James-Houff
3104 Norwest Woods Lane
Bloomington, IN 47404

1021-034

3591

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
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People in the rural area are 3x more likely to die from traumatic illness or injury because of the time it takes to get to definitive medical care than those in metropolitan counterparts. Modern medicine can do wonderful things for strokes, heart attacks, trauma "if" it is administered in time.
I-69/alternate Rte 3+4 will save lives by saving time for the majority of rural citizenry! 5.3

* definitive - end case required which is rarely available in small rural hospitals.

Please - sincerely consider this essential issue

Any ER director can verify this information or contact Air Evac Lifeteam at 877-409-3557

(continue on other side)

1101-020

(continued from other side)

Daviess Community Hosp. Board of Governors member

Name Brenda Sobecki

Address 1208 Bedford Rd.

City/State/Zip Washington, In 47501

October 22, 2002

Governor Frank O'Bannon
Indiana State Capital
200 West Washington Street
Indianapolis, IN 46204

Subject: Routing of the southern leg of I-69

Dear Governor O'Bannon,

Hopefully the Wisdom of Solomon will help you with possibly the most important decision of your administration. That decision is the routing of I-69's southern leg through Indiana.

Two potential legs, Route 2 and 4, would run extensively through Owen County. At first glance it appears a logical choice since this county has a fairly thin population. Yet, on closer examination, this county has a uniqueness which could be seriously harmed should I-69 be routed through this county. Owen County in particular has a charm that personifies traditional values which contribute mightily to our Hoosier culture. Best summed-up, the people of Owen County display an unsophisticated value of good old common sense. This simplicity of manner was seen in many of Norman Rockwell's paintings a generation ago. In a certain sense the tradition of Norman Rockwell is still alive and well in Owen County.

5.3 The Hoosier culture of folk from Owen County is generously reinforced in the county's rustic setting of beautiful forests, rolling farms and pastures, interrupted at times, by rugged and scenic landscape. If allowed to grow unhindered, Owen County has all the potential of becoming a tourist magnet in the 21st Century as Brown County did in the 20th Century. Should this natural environmental progression be compromised by I-69 with all of its adverse fallout, the future of the county would be placed in great jeopardy.

What appears to most logical route to the vast majority of Hoosier minds is the enhancement of I-70 and US 41. This route seems to have the least support of your advisors. Although 13 minutes longer in time than running a diagonal route, it appears to do the least amount of damage to the farm and forest infrastructure as well as being the least expensive route.

Again, may the Wisdom of Solomon be with you as you grapple with the I-69 decision.

Sincerely yours,

George H. Maley

1022-015

George H. Maley
4531 N. Meridian Street
Indianapolis, IN 46208

CC: Michael Grovak, INDOT
Indianapolis Star

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

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PLEASE ENTER YOUR COMMENTS BELOW.

THE GOVERNOR IS ON THE SIDE OF HIGHWAY BUILDERS AND NOT TAXPAYERS. I REALIZE HE HAS BEEN PAID BY THEM TO PURSUE THIS COURSE. HE CAN ALWAYS RAISE OUR TAXES AGAIN. THE HIGHWAY WOULD DESTROY SUNSHINE GARDENS. HE MORE LIKELY CONDEMN THIS AREA AND REST AND NOT PAY FOR PROPERTY. 5.3

RECEIVED
OCT 25 2002
BLA

1025-028

Name

Address

Mr. Jackie Yarbrough
3037 W Thompson Rd.
Indianapolis, IN 46217

Subj: DEIS Comments
Date: 10/30/02 7:45:18 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Mark A. Richardson
Address = 7811 N. Thames Drive
City = Bloomington
State = IN
ZIP = 47408-9337
Email = mlrichardson@bluemarble.net
Message = Mike Grovak
Project Manager
Bernardin, Lochmueller and Assoc. Inc.

Dear Mr. Grovak:
I would like to voice my opposition to the I-69 highway following the route of State Road 37 through Bloomington, Indiana. We live in a neighborhood north of Bloomington, adjacent to the Oliver Winery. It is our understanding that if I-69 were to follow State Road 37 our homes and Oliver Winery would be acquired by the State of Indiana, because our only egress from the winery and our neighborhood is Winery Road off State Road 37.

Oliver Winery is a major tourist destination point for south central Indiana. Its loss would be a great loss to our community, both financially and culturally. The winery also employs forty-five people in a community still reeling from the loss of manufacturing jobs to Mexico. 5.3

Our neighborhood, Windsor Private Estates, is a small neighborhood of roughly thirty houses in the $300,000 to $500,000 price range. With the State of Indiana acquiring our homes for pennies on the dollar, virtually all of the residents will be thrown into personal bankruptcy. 5.3

I commute daily to Eli Lilly and Company in downtown Indianapolis. State Road 37 meets my commuting needs just fine. I would rather have a few traffic lights in my commute than face financial ruin.

If you must build an interstate, I would begrudgingly support the I-70/US-41 route through Terre Haute. My first choice would be to refurbish and maintain the existing roads from Indianapolis to Evansville. An additional interstate highway is unnecessary.

Sincerely,

Mark A. Richardson
7811 N. Thames Drive
Bloomington, IN 47408-9337

1030-011 Richardson, Mark.wpd

Subj: New I-69 Study Form Feedback
Date: 11/5/02 12:30:33 PM EST
From: joedaddy@bluemarble.net (Joseph E. Allman)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Joseph E. Allman
907 East Vixen Drive
Bloomington, IN 47408

Message:
I am very much against building US 69 on the same location as now existing highway 37. I think it would be a travesty in the amount of disruption to existing homes and businesses along 37 from Indianapolis through Blommington. A much better alternative site for the highway would be new terrain from Indianapolis, perhaps between highways 37 and 67, and then using existing highways 67, or 57 or 231, which have a lot fewer homes and businesses along them than does 37. I do not think that other pre-existing highways were built on top of, such as 65 70 or 69 north of Indianapolis, when they were built, and I see no need to so completely destroy so much of what has been built up over the years along 37 in building this road. The disruption to the communities along 37, if 69 were built on top of 37, would far outweigh any benefit to the local peoples who would have an artificial east and west barrier (like Berlin Wall) dropped into the middle of their lives. A lot of people fell this way, most of whom will probably never comment on the plan. Please let reason prevail and stop considering this insane idea. Joseph E. Allman

5.3

1105-064 Allman, Joseph.wpd

Subj: New I-69 Study Form Feedback
Date: 8/16/02 11:54:58 AM EST
From: JKG818@aol.com (James Kevin Grider)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

James Kevin Grider
4000 AJ Drive S
Wadesville, IN 47638

Message:
Greetings,

I have searched and searched and I can not find any assistance or information on the following Items. Please help me find the answeres to the following questions.

1. What happens first,if the state wants my house?

2. Will the state pay me what my house is worth?

3. How close can the state build to my house?

4. Is there compensation for devaluation of my house due to the states activities?

5. Do the powers that be realize the anxiety they are creating by not making a good profitable choice of east or west corridors?

5.3

0816-009 Grider, James.wpd

INOOT2

Governor's Internet Mail

From: John & France [bikesmiths@smithville.net]
Sent: Monday, August 26, 2002 8:09 AM
To: fobannon@state.in.us
Subject: The I-69 Toll Road

What will be I-69's"Toll" in stress related strokes, deaths and broken family's, from of this new terrain highway".

I have tried to think of an act of nature that would destroy so permanently so many Indiana homes, families and lives. If the New Madrid fault opened up and swallowed this much land it would be a natural disaster of biblical proportion. No Indiana forest fire has ever destroyed so many homes and I doubt that any have. In Indiana, it's like the biggest tornado ever, that knocks flat every house in a very wide a swath from Evansville to Bloomington, with a lasting roar that may never stop. There has never been such a tornado. A flood that over runs it's banks and washes away the homes along it's path is more like it, but even then the homeowners had some idea of the possibility when they chose their location. The same is true of hurricanes and tidal waves and volcano's which in Greene County I thought were not a possibility. The thing that nature never does is takes the land. It's there to rebuild on with life long ties to one's neighbors and family.

Nature is not as cruel as the moneyed, the bought and the brainwashed persons who would request this unnatural disaster to sweep across our state.

Moving and money difficulties are two of the top three causes of stress related illness, death and divorce. I am sure that many Hoosier's emotional and physical health is not up to this challenge. Death and family destruction will follow in the wake of a "New Terrain" highway. What will be the death toll? How many new stress related divorces and disabling health related problems like strokes and emotional disorders? I would hope that the EIS study would include a Center for Disease control assessment of this environmental effect on the thousands of southern Indiana homeowners and their children involved. 5.3

Indiana rates in the top 3 states in the number of interstate Highways entering and leaving. Indianapolis has more Interstate highway connections than any other City;
More than New York, Chicago, Houston, Seattle, Los Angles...Any. We don't NEED this highway. Please take our compromise of IN 41 - I-70 and let us keep our lives.

I have opposed the building of this highway publicly for over ten years. I call for the "No Build" option but can support the Indiana 40 - I-70 plan. I learned last Sunday, August 17th 2002 that my historic, blissful green county house with its forest and gardens is on the two most favored routes.

John Smith
RR3 Box 486
Solsberry, IN 47459

0826-055

8/21/02 This is Don Marshall I've got the D.C. Marshall auto dealership north of Sullivan, about 4 miles on 41 and I just wanted to call and express my opinion on the fact that I am one of maybe a few that does not want the project to come through Terre Haute. I know you see that the C of C supports it, but with it coming next to our 8 acres at the dealership, it would just absolutely devastate us due to the lack of ingress and egress to the dealership property. I'm sure it would be very limited access. and probably would be detrimental if not destroy the business completely because of not being able to get to it. Obviously, we have to display the cars and park the cars to properly conduct business. As they say, the cars are the stars, and if they would have the setback any further, the lack of getting to the lot any harder than what it is now from the highway, it would destroy us, Obviously, with all the franchises they've got, all the General Motors and Chrysler, it would be a major detrimental impact on us. So, I for one, am not for it to go down 41. I hope you pick the path that is the quickest and the most sensible, which is a more direct route. Just wanted to put that on the record. 5.5

0821-160 Marshall, Don.wpd

Subj: DEIS Comments
Date: 11/7/02 8:59:41 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = david porter
Address = 5796 w. st. rd. 45
City = bloomington
State = IN
ZIP = 47403
Email = maker@earth-maker.com
Message = The DEIS did not identify the karst features on my farm which is selected to die for route 3. It did not take into account the constructed wetland nor the environmental restoration that has been taking place on the farm. 5.24

Flooding impacts from increased water run-off was not addressed for Richland creek nor were impacts on pcb laden sediments and ongoing discharges of pcb's from superfund sites.

The environmental costs are understated because of a bias toward human constructed environments and against "natural systems". Ecosystem services are not correctly analized nor valued. Money and human desire is over valued.

There is a climate modifying up-draft centered on my farm that affects storm impacts on Bloomington. It could be damaged by habitat and terrain change.

An ongoing population ecology study conducted by DR. M. Watson at IU would be ruined and the money invested in the baseline data set wasted.

My business would not be rebuilt and since I am the only registered composting facility in Monroe Co. that process large trees and land clearing debris there will be no place for this waste to be disposed of. 5.5

My farming and market gardening efforts and associated investment will not be compensated at realistic rates. The community will miss the organic local production we generate.

The old trees in the forested part of the property will not be valued correctly. per capita old trees to humans continues to decline. 100 + year old trees become rare and as such gain a value not reflected in the price of lumber.

I do not wish to sell you my farm, 9030 w. st. rd. 48 nor my business Topsoil Composting Service, 8700 w. Vernal pk. Monroe Co.

Build right turn lanes on all the intersections in the state where it is possible. This would spread the pork around and let lots of little contractors have a suck at the tit. In 2 years these would save Hoosiers enough time and gas to pay for the project. With the money that's left build a good truck route out of 70/41.

Do not put an Interstate through the rural, undevelped,southwest part of the state.

D. T. Porter

1107-517 Porter, David.wpd

Subj: New I-69 Study Form Feedback
Date: 11/7/02 4:48:54 PM EST
From: djmp900@hotmail.com (David J. Perry)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

David J. Perry
603 W. State St.
Princeton, IN 47670

Message:
Today is the last day so I thought I would weigh in on the situation. Common sense tells us that the new highway should be just that. A new highway. A direct link would displace less homes and businesses. Sure it will take asome farm land and wild lands. Sure it will destroy a few homes. Progress has been doing this for years. I hope that the State will pay these folks a fair "plus" price for the lands, homes and businesses.

41 and I-70 are already overcrowded. I always take the back roads (67, 57, 50 & 31) when I travel to Indy. I take it easy, allow myself plenty of time and enjoy the drive. Most people are in too big a hurry these days.

Take a drive down the Blueridge Parkway. Then come back and build a direct highway from I-64 to Indy.

Some folks are worried that "we might split some farmland into." What about the little towns? Take Fort Branch. You'll litterly cut the town into. One maybe two exits at either end and Bang! the town dies. 5.5

These are just my thoughts. Please build a direct highway.

Thank You,

Dave Perry

1107-157 Perry, David.wpd

INDOT2

From: Yakimchick [Mike@ci-g.org]
Sent: Friday, September 13, 2002 10:35 AM
To: FOBANNON@STATE.IN.US
Subject: I-69 HIGHWAY

Dear Governor,

We have been told that you are going to approve the expenditure of $400,000,000 to $500,000,000 for the new I-69 highway in the next 5-10 years(state's 20% share of the project cost). I have a few questions that I would appreciate answers on:

1. In the year 2002 the DNR could not afford
   a. A $9,000 expense to keep a campground open at Potato Creek
   b. Could not afford to keep a northern beach open for the summer
   c. Could not afford to keep many park pools open for the summer
   d. Could not afford to hire temps for maintenance and visitor programs
2. In the year 2002-2003 that state can not afford all of the expenditures for day care for needy families.
   The list goes on and on about " can't afford" programs.
3. In the year 2002 the mayor of Indianapolis announces that the city could afford to give the Colts additional $10,000,000 per year for bottom line profit.
4. In the year 2002 the city of Indianapolis Parks Department wants to purchase 101 acres to add to Southwestway Park(a very smart move) and asks the taxpayers to pitch in and fund $400,000 of the purchase price through private fundraising.

Question: If the DNR and state Social Services agencies can not afford the seemingly small and not-so-small projects then where is the huge amount of money coming from to fund the I-69 and Colts projects? As a citizen, property tax payer and voter in Marion County and the state of Indiana I find the above mentioned budget and expediture issues very disturbing. 5.5

Question:

We have been told that the I-69 alternatives have ruled out the IND 41/ I-70 route. I have been to many meetings on this subject, talked to people from Evansville and Terre Haute and not one person (except a rep of INDOT) can give any good reason for the highway not take to most obvious route (if the highway really has to be built). The alternate route through Marion county up Mann Rd. is morally wrong for many reasons. I can not believe that you, our Governor, would allow old and new homesteads (not just brick and mortor) be destroyed, a church along the route be destroyed, Indianapolis Park land be destroyed (Mann/Southport property), new homes under construction be destroyed, two historical homes be destroyed and so forth. How can you stop the Mann RD. route as being an alternative for I-69 through Marion County?

With much respect and admiration,

Mike Yakimchick
7369 Mann Rd
Indpls 46221

0913-032

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

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PLEASE ENTER YOUR COMMENTS BELOW. 10-22-02

I do not want a new terrain I-69
Please up date the roads we now have
and save tax dollars
Individuals and Organization realized
that there is more in this world
than speed and technology.
I shot have one Question
Why would anyone want to build a
new terrain highway right down the
Madrid geologic fault line from
Evansville In. to Bloomington, In. 5.5

Telephone # 812-863-7743

RECEIVED
OCT 23 2002

1022-012

Name Emma Lee Donahue
Address RR#1 Box 820
City/State/Zip Stinesville In 47462

October 16, 2002

Governor Frank O'Bannon
The Statehouse, Room 206
Indianapolis, IN 46204

OCT 18 2002

I am writing to express my concerns about the proposed I-69 project. I DO NOT support a New-Terrain route of the interstate highway between Evansville and Indianapolis.

With the millions of tax dollars it will take to build a new interstate, it's only common sense to use the US-41/I-70 route. This would save hundreds of millions of tax dollars. With the budget crisis Indiana is currently in and with the vast amount of unemployment in the state, we do not need to waste money building a new road when much of the existing highway system can be used. In addition a "new terrain" route will destroy hundreds of homes and thousands of acres of farmland and forest.

A route through Owen County (my home) will destroy hundreds of homes (mine included), farms and business eliminating a large part of the counties property tax base. With the tax base reduced how are we to finance our schools? 5.5

All of the "new terrain" routes selected by the Department of Transportation would be disasters for the economy. I am sure you do not want to be known as the governor that left Indiana with a huge tax burden and destroyed rural way of life so many of us cherish.

I believe the Department of Transportation should choose the US 41/I-70 route and concentrate on upgrading the existing highways.

Thank you for your help in this matter.

Sincerely,

Janet Long

Janet Long
R. 5 Box 596
Spencer, IN 47460
812-829-2667

1016-008

REAM, GAYLE

From: Greg Buck [gregorybuck@hotmail.com]
Sent: Friday, November 08, 2002 3:05 AM
To: gream@indot.state.in.us
Subject: New perspectives on I-69

Dear Mr. Nichol:

I hope that this letter is not too late!

Do not extend I-69 to between Indianapolis and Evansville.

I urge you to highly value my thoughts because of the information and thoughts that I have to share, even though I am not from Evansville. Also, if it helps, consider that I am a Hoosier whose ancestors migrated over 100 years ago to St. Wendell near Evansville. Moreover, consider that I have family and friends in Southwestern Indiana. Also, consider that I am someone who understands business from the point of view of study and practice. Most importantly, consider that I have empathy for nature and people.

For context, know that the highway proposal is not just about what could happen in the few yards of the various alternative corridors of I-69. If the highway is extended, it's also about what would happen beyond the corridor, even beyond the State of Indiana. Setting up the infrastructure will result in more mal-development that would spread well beyond any selected corridor. Learn from the results in California where they have discovered that, despite good intentions, new highways result in more places for congestion both on the road and off the road. The national population and rate of population increases would likely force similar results in Indiana, if not immediately then later. Therefore, the D.E.I.S.'s predictions of reduction in crashes and congestion in preferred routes would be futile.

For further context, know that we do not have enough natural resources. For example, since the 1980s we have been using up more resources than the earth can recharge for future generations. Also, for example, a recent report from ecological economists stated that due to our excess in development any current development of nature costs us 100 times the original monetary value of the land. For example, the flood protection lost from development actually costs us. Furthermore, we must decrease, not increase, the threats to our resource of land that holds a nature preserve and protects endangered species.

The D.E.I.S. emphasizes as core goals speed of personal transportation, ease of personal transportation and speed of freight shipping. They basically boil down to an alleged need for speed. Such goals with shortsighted consequences make it easy to down play and ignore costs and assets that are much more worthy of considering.

Oddly, economic benefit to southwestern Indiana was the State's original goal for I-69 but this goal is secondary given the D.E.I.S.'s three core goals. Goals of economic benefit and values for quality places can go hand in hand, but goals of speed and values for quality places usually, if not always, will be in conflict. The D.E.I.S. reflects to me a perspective of tunnel vision for the sake of speed of transportation, despite jeopardization of many un- and under- acknowledged assets and hidden costs.

Let us look at some of the assets and costs that are extremely more worthy of consideration than are the core values written in the current D.E.I.S.

1107-687

11/8/2002

ASSETS OF SOUTHWESTERN INDIANA THAT ARE MORE IMPORTANT THAN SPEED

The worth of these assets is tremendously more important than speed and certain types of economic gain at the expense of the people and nature in Southwestern Indiana. As you can well imagine I will come nowhere near covering all of the wonderful assets of Indiana that are threatened by extending I-69.

Know that we do not have a surplus of natural resources. We have a deficit with nature.

The assets to be covered are 1. quality of place, 2. land for agriculture, 3. climate change stopping vegetation, 4. pure water and air, 5. biodiversity, 6. opportunities for outdoor recreation, and 7. resourceful residents.

QUALITY OF PLACE

The three core goals in the D.E.I.S. reflect a sense that speed of transportation is of extreme importance, so much so that it can be stated in the three core goals. The remaining 8 goals are therefore only peripheral goals. This value for speed is at the expense of many residents of Southwestern Indiana who are rooted in the present, the here and now.

One benefit of this special place is the quality of sound in many of the corridors proposed for an extension of I-69, which is minimal and pleasantly natural. I know the preciousness the sounds in rural areas from being in Southwestern Indiana and from growing up on a farm in the Midwest. In contrast, I have also lived near an interstate. The noise from the highway usually kept me up an hour or two past my usual bedtime. Do not subject more people to this experience. Do not take this point about living along highways as an invitation to find ways to make less noise with highways. Sense of place cannot be merely with quieter automobiles and sound barriers.

Much of this area is a space where it is a wonderful treat to experience the outdoors and nature. I enjoy it out there as it is, including when I camp in Buckner's Cave, and in and near Bloomington, when I ride my bike to Southwestway Park on Mann Road, when I walk around Bloomington and Terre Haute. At least one of these places is in the direct corridor of a proposed expansion of I-69; nonetheless, such future outdoor experiences would be negatively impacted by laying out an infrastructure that promote a panacea of development that would ruin the possibility of these experiences for residents and visitors.

The neighborly quality of the area will be damaged. I am very familiar with the sense of safety and friendliness that usually exists between rural neighbors in the Midwest.

If you have not already, you will need to get ecologists, psychologists and sociologists who can put an economic value on quality of place. The ecological related field is called ecological economy. Perhaps an ecological psychologist could work with an ecological economist to come up with the psychological costs in terms of dollars. Perhaps someone in the outdoor recreation field can assess the losses in local recreation and trade. If, as I imagine, you feel that it would be unacceptable to incorporate such information in your final report, also find unacceptable the devastation to Indiana of the hypothetical highway extension. 5.7

There is nothing you can do about this I-69 issue short of not building the extension that would contribute to the quality sense of place in the proposed corridors.

The main consequence of an I-69 would be to ruin much of Southwestern Indiana and create an infrastructure that would result in more ruination of this wonderful place. Personally I do not need nor foresee a need for I-69 to expand. Between my residence and Bloomington and Evansville my mail and parcels arrive in a timely manner, and travel by automobile is adequate. My only disappointment is that there is not timely enough mass transportation between Downtown Indianapolis and Evansville, and Downtown Indianapolis and Bloomington. Fix that problem with some verbal persuasion about and/or funding for more timely bus trips, not a highway.

Avoid California's mistake. Much of their sense of place was ruined with highway construction, so much that Governor Davis has committed the state to never building another highway.

LAND FOR AGRICULTURE

The benefits of the agricultural acreage that is threatened by an expansion of I-69 that the D.E.I.S. failed to account for include the following:

- The security of local crop production, in the event of crop failures and productivity declines elsewhere and other crises. Anticipated problems include 1. Less rain in the Midwest during summers due to deforestation in Brazil (forecasted in a recent report), 2. Excessive heat from global warming, and 3. Plant damage from excess ultraviolet. (We need more vegetation to counter these forecasted problems.)
- Acreage to be needed for biomass and vegetable oil for heating, electricity and transportation so as to cease or reduce the costs of climate change and dependence upon remotely extracted fuels.
- Acreage that is or could have been used for environmentally sustainable agriculture opportunities, including tree farms, green houses, and harvesting persimmons and mushrooms, and walnuts for food and dye.
- When agriculture is done properly, flooding will be reduced or even prevented. Pavement, on the other hand, facilitates flooding.

CLIMATE CHANGE STOPPAGE OR REVERSAL

The threatened vegetation is needed to stop or reverse climate change. What is the dollar amount value of land that stops climate change? Write the answer to question in your final report.

PURE WATER AND CLEAN AIR

The benefits of clean air and water need to be evaluated in a balanced F.E.I.S.

BIODIVERSITY

Perhaps one of the hardest things to put a dollar amount on is the worth of the current and hopefully increased biodiversity of Southwest Indiana. Regardless of whether I ever see an Indiana bat or a bald eagle it thrills me to know that these endangered species are in Southwestern Indiana and would thrill me more to know that they are flourishing. There is value in the tourists coming to experience these diverse life forms. Who can predict what additional value we might find in a known or unknown living beings? A cure to breast cancer, AIDS or diabetes? A wonderful food? I urge you to be open the possibility these new discoveries; opportunities that could be lost with due to construction of a highway and subsequent mal-development.

OUTDOOR RECREATION OPPORTUNITES

Consider the emotional benefits of outdoor recreation to residents of and visitors to Southwestern Indiana. If not for the presence of these opportunities we might find many more people in the emotional and physical messes. A highway extension would result in less land for outdoor recreation and less outdoor recreation.

RESOURCEFULL RESIDENTS

As I best understand the stated purpose of the I-69 expansion is economic advancement of the poor of Southwestern Indiana. Many of these people are only poor on paper or income. In many instances, their resourcefulness has carried them along quite well. For example, I know a lady from Owen County who lives a superb quality of life despite living without electricity and yet she is probably on the State of Indiana's statistics as one of the impoverished, even though she is very healthy, owns her home and is financially independent. Furthermore, as I have stated in various ways, the people of Southwestern Indiana are wealthy with residence in a very high quality place with ample resources.

Actual requests for help that I am hearing out of Southwestern Indiana are for protection of nature and farmlands, better education for children, more mental health services, and improvements of existing roads. With not too much persuasion I am certain that many would be pleased to compliment their resourcefulness with small business loans. These loans would give vitality to the economy of Southwestern Indiana with diversification of products and services. I urge you to heavily support starting and sustaining many small businesses in Southwestern Indiana. Not only would their business endeavors likely stimulate the local economy but their success would also bring funds to the Indiana State government. Of course those who wish to be alone to exercise their environmentally and socially appropriate resourceful ways of life would not be discombobulated by Indiana State government's small business programs. On the other hand, if I-69 were extended into Southwestern Indiana, this act would take away the place where many of these people, including my friend Cathy, best excelled.

Weigh the assets of 1. quality of place, 2. land for agriculture, 3. climate change stopping vegetation, 4. pure water and air, 5. biodiversity, 6. opportunities for outdoor recreation, and 7. resourceful residents.

It would be ridiculous to do another D.E.I.S. for this proposed highway. If you are determined to improve the situation of Southwest Indiana, do not impose on the residents of Southwestern Indiana with obliteration of resources in construction, and do not facilitate further damage in subsequent sprawling development. It will be easier and actually appropriate to build and enhance resources that are present. For example, I have spoken to many people with diverse points of view about possibly extending I-69 and none seemed like they would have a problem with increases in the number of small businesses in Southwestern Indiana that receive loans.

In your final report, include the valuable assets that must be more fully considered, including the assets that I just covered. They are more important than the goals of faster personal transportation, easier local mobility and faster shipping.

COSTS THAT HAVE GONE UNDER CONSIDERED OR IGNORED

I urge you to heavily weigh in these potential costs, much more than you did the three core goals of the D.E.I.S.

THE SEVEN ASSETS

1. quality of place, 2. needed agricultural acreage, 3. climate change stopping vegetation, 4. pure water and air, 5. biodiversity, 6. opportunities for outdoor recreation, and 7. resourceful residents. These categories were already visited as assets and must be heavily weighed in also as costs in your accounting system.

WELL BEING OF THE PEOPLE IN AND NEAR A CORRIDOR SELECTED AS I-69

The source of well-being and resourcefulness of many people in Southwestern Indiana is tied to the land, as is healthy. If the Indiana Department of Transportation chooses to construct an expansion of I-69, the results would cost many of those in the selected corridor much emotional stress, depression, unproductive time and moving costs. 5.5

SUBSEQUENT MAL-DEVELOPMENT

Any conventional unsustainable development is actually mal-development. Why? Consider that the global rate of consumption is exceeding the earth's capacity to regenerate resources. Consider that in the instance of this highway the most prized assets of Southwestern Indiana are threatened. Moreover, the mal-development that needs to be evaluated does not stop in the corridor of the highway. Subsequently, there would be a glut of malls, gas stations, housing, and other new roads.

What is commonly called development could be mistaken for progress, but let's look at two costs that were probably not included in the price of highway construction.

1. Floods would be more frequent and intense due to the lack of flood damage prevention from plants and protected flood plain that is occupied by few or no humans. New flood prevention measures would have to be put in place. People will likely live in flood plains. At times the measures will fail, more devastation that could have been prevented by working with nature, instead of opposing nature out of an alleged need for speed.

2. Regarding the future of employment in the area of the highway corridor, the situation will be dismal. The work will be less meaningful since it will be disconnected from caring for the earth, the arts, and other quality experiences. I heard of reports that there would be slight increases of employment in these underpaid jobs; however, perhaps these reports do not account for the fact that when a Wal-Mart moves in the level of employment goes down because the businesses that the Wal-Mart Store puts out of business results in more firings by the displaced stores than hirings by Wal-Mart. Wal-Martization or something like it will be a cost for which you need to account.

COSTS FROM WITH DRIVING PERSONAL AUTOMOBILES

Use of personal vehicles costs and will cost us dearly in death (personally three uncles and two cousins), health (e.g., asthma), injury (whiplash for me), financially (auto and parts purchases, leases, insurance, repairs, medical care, etc.), and in use and manufacture the resulting pollution, resource depletion and global climate change (floods, drought, desertification, ultraviolet damage that results in damage to plants and in skin cancer).

One of the non-core goals of the D.E.I.S. is "potential reduction of crashes and congestion." No one wants death and suffering. Automobiles, especially personal cars facilitate congestion and crashes. Learn from Governor Grey Davis of California who has learned that new highways do not reduce crashes and congestion, they invite new places for congestion and crashes; learn from their mistake, not from comparing in practice their mistake to your mistake.

Let's step outside of the box of personal transportation. Frame the risk of crashes and congestion in the context of an attractive quality running bus and/or train system that frequently runs. The rates of crashes and congestion are typically reduced with mass transportation. By the way, include in the F.E.I.S. this transportation alternative. It would stack up quite well to the values for nature and sense of place that we Hoosiers have been persistently promoting, much better than these controversial highway options.

One way, a mass transportation system would be superior is by putting us in a stronger ability to reduce resource depletion with less consumption of petroleum and other materials (from less use of personal vehicles).

Another advantage of this system would be a reduction in our role in bringing about climate change because of saving vegetation that can stop the causes and the reduced consumption of stuff that results in climate change, i.e. petroleum, and materials used in manufacture of automobile manufacturing and repair.

Through use of locally produced vegetable oil in diesel engines that could power the mass transportation we could get a better handle on resource depletion and reduction of climate changing gases as well as support for the local economy.

So, failure to develop mass transportation **costs** us all the disadvantages of personal vehicles as well as **costing** us an opportunity for clean energy independence with no waste of road construction.

By the way, it is very likely that the controversy of the corridor alternatives would generate support for a superior bus and/or rail system.

Incidentally, in case you did not account for the costs of travel time and material expenses by being cut off from neighbors, recreation, and special places, please do so. Also, account for more time for travel to and less time for recreation and more expense (lower quality if any quality to the experience) and the cost of not going out for recreation due to the increases in destination and elimination of special places.

COSTS TO THE STATE OF INDIANA'S GOVERNMENT

The costs to the State of Indiana are not the costs of construction. The State faces potential costs of lawsuits, increased remediation in damages, future political backlash, reception of a bad reputation and other unanticipated costs.

One example, is the consequences of decreased flood protection from loss of the vegetation that prevent flooding. Account for bodies of water clogged with sediment. Account for the increased loss of loss of crop productivity due to more flooding and loss of topsoil. Account for the increased flow of contaminants in the forms of pesticides and sediment that are washed into and damaging bodies of water, including the Gulf of Mexico where there is and should not be a dead zone below Louisiana. Account for the reactions of Hoosiers and others who would suffer from those results, especially their political and legal actions. Let's instead be good neighbors to other states and exercise responsible leadership for the citizens of Indiana. 5.24

Another example, is the impact of the considered highway upon the residents of Southwestern Indiana who have a healthy attachment to the land. (This example is complimentary to the asset of resourceful residents.) Their resourcefulness comes from access to the resources of the land. The D.E.I.S. did not account for mental health counselors, divorce lawyers, and the replacement

of special places and communities that will need to be provided. Furthermore, the D.E.I.S. did not account for the lack of productivity as these residents are imposed upon with the problem of this highway extension. The money that might be offered to land owners for a highway corridor would not fill their needs for a sense of place. Mental health, including the sense of place, is something much more than a privilege. How could the State possibly afford replacement of nature and human community? Even if the state government somehow could, it would not be right to put people through the distress for the sake of speeding through the area in a personal vehicle or semi-tractor trailer.

A final example is the cost of the unaffordability of other possible expenditures that are vastly more desirable than a highway, due to funds instead going to the highway. I once heard the price per job created; it was outlandish. The State's budget is already very tight. There are many more urgent expenditures that I would prefer to see go **unneglected**. These expenditures include facilitation of parenting, higher quality public education*, urban sprawl reversal, advocacy and development of ecological cities, promotion of sustainable home extracted energies (including photovoltaic solar, geothermal, solar thermal, infrastructural improvements (including road repairs and cessation of combined sewer overflow), small business promotion*, startup and support, a mass transit system between Indianapolis and Evansville, and mental* and physical health care.

(*My aunt residing in Evansville told me that she favors better public education, small business loans and more mental health service over expenditure on an expansion of I-69.)

Even if the government of the State of Indiana never gets sued nor has to pay the costs of damages, the price we would pay in reputation in being a poor leader for Hoosiers and a bad neighbor to other states is reason enough to not build the highway.

CONCLUSION

All this possible suffering and destruction is for a highway is totally unnecessary. Extending I-69 is a boondoggle in light of our gluttonous consumption of resources and frivolous in light of the resourcefulness of Southwestern Hoosiers who might merely need help being better at what they do, not displacement and mal-development!

In the Final Environmental Impact Statement, the core goals must much more strongly represent the assets and costs that I presented in this paper. The current core goals in the D.E.I.S. must be dropped out or weakened to at the most the third lowest level. Drop consideration of the route concepts because of the assets and costs that must be more highly considered. If there is still a feeling that the route concepts must be considered, account for the space that is miles beyond the corridor and time that is decades beyond immediate the impact of completion of this hypothetical road include the in the Final Environmental Impact Statement. Furthermore, if you must do something for Southwestern Indiana, implement the projects that I propose later in this conclusion.

Do not box us in by assuming the following: 1. Southwestern Indiana is needy in ways that must be changed, 2. a highway is the best solution to any alleged neediness in Southwestern Indiana, 3. speed of transportation between Indianapolis and Evansville is an extremely important consideration, 4. the quantity of freight shipments to and through Indiana must be maximized. It is these kinds of assumptions that facilitate a tunnel vision that blinds people to the much more important values that are reflected in the assets and costs that were examined.

We need visionaries of a better future. Unfortunately, the recently issued Draft Environmental Impact Statement on proposed construction of I-69 between Indianapolis and Evansville resonates of tunnel vision of a future to which most of us Hoosiers do not wish to go. There seems to be a determination to build the highway no matter what the citizens say and no matter what the costs.

Personally I do not need nor foresee a need for I-69 to expand. Between my residence and Bloomington and Evansville my mail and parcels arrive in a timely manner, and travel by automobile is adequate. My only disappointment is that there is not frequent enough and timely enough mass transportation between Downtown Indianapolis and Evansville and Bloomington.

By the way, the process of commenting disregards citizen opposition and concern for our resources. For instance,
1.The comment period was only 90 days.
2. Letters were not sent to inform property owners in the corridors of considered for an expansion of I-69, even though millions of dollars were spent on the D.E.I.S. United States Senator Richard Lugar complained about this lack of information in a letter he recently wrote to Indiana Department of Transportation because he has land jeopardized by a version of proposed I-69.
3.There was no hearing about the D.E.I.S. in Indianapolis.
4. A member of Governor O'Bannon's staff told a New Terrain I-69 opponent that her opinion did not count because she is from Fort Wayne.

Despite these problems with the process know that there is a growing quantity of messages and powerful compulsion of the opposition to New Terrain I-69 and to any new I-69. Ultimately I will know we are being heard, if no highway will be built, or if I-70 and US-41 would be the corridor for extending I-69. I know what people are saying about I-69 from listening at a comment period hearing, listening to attendees at other hearings and sorting through the grain and the chaff in the press. There is no thoughtful silent majority that is for a New Terrain I-69.

If you are truly on a mission for economic benefit for Southwestern Indiana consider that Indiana has very limited resources as pointed out at this year's State of the State speech by Governor O'Bannon. Even though the governor did not slice the highway off the budget we can still do just that. There are vastly more important investments of education improvements, preventive physical and mental health, and small business loans.

If money is available after adequately covering the above noted investments, take care of Southwestern Indiana with some more effective projects. The intentions of those interested in bettering Southwestern Indiana would best excel if instead of the highway they take on different projects. With proper planning the amount of travel by personal automobile would be reduced. The projects are complimentary to the people of Southwestern Indiana, instead of intrusive or imposing. The projects include the following:

1. Facilitate development of ecocities in Evansville, Bloomington and Indianapolis that have ample options for healthy outdoor recreation, and diverse means of income, including agriculture and manufacturing to meet local needs. The design could be just a few steps up from condominiums. The enhancements would make such residences very attractive.
2. Facilitate increased access to the internet by more people in Southwestern Indiana.
3. Respect for, support for and advocacy for simple lifestyles throughout Indiana.
4. Promote human population decline in ways that are respectful of religions and migrants.
5. Support for and advocacy for small businesses and local economies at home and afar, especially agriculture and manufacturing to meet local needs. We very much need locally extracted and processed vegetable oil to power diesel engines in order to stop inappropriate energy dependency; pollution, and climate change. The land saved from highway extension could be a part of this program.

6. Attractive mass transportation, especially by powering the equipment's diesel engines with locally produced vegetable oil. Rail would be the preferred method in the long run because of the durability of the equipment, reduction in imposition on roads, and additional possibilities in shipping freight.

Include analysis of these projects in the Final Environmental Impact Statement.

Sincerely,

Gregory J. Buck
537 Fletcher Ave. #2
Indianapolis, IN 46203

P.S. Despite what State House reporter Jim Shella says about Governor O'Bannon needing political backbone for extending I-69, know that there is respect and honor in doing the right thing, even when it means changing his mind.

RECEIVED NOV 4 2002

Worm's Way
www.wormsway.com
7854 N. State Road 37 • Bloomington, IN 47404
812-876-6450 • Fax 812-876-6478

November 1, 2002

Mike Grovak
Project Manager
Bernardin Lochmueller and Associates, Inc.
6200 Vogel Road
Evansville, IN 47715

Dear Mr. Grovak:

As a business owner along State Road 37, I oppose new terrain routes through Monroe County as we have been informed that one would not be feasible for the project to include an access road to our business. We do not classify ourselves as a small, locally owned business as your project team may identify us as noted in the research study. 5.5

Our company is an ESOP (Employee Owned) Company. The company is not only an Indiana retail business, but a wholesale distributor throughout the United States and Canada. We also have a Mail Order Division and currently five additional retail stores. We currently employee 75 people and have a payroll of approximately $2 million and expect to exceed $15 million in annual sales this year.

We are in an expansion period and have just completed a new $2 million building project Our projections for the next five years will include employing 125+ employees with a payroll of $3 to $4 million and annual sales exceeding $30 million.

The loss of revenues and income for families dependent on the operation of this business would be a substantial loss to Monroe County and central Indiana, already hard hit from the recent economic woes.

We are asking you to take this information into consideration when deciding on the route of I-69 and whether new terrain routes are acceptable.

Sincerely,

Martin Heydt, CEO
Worm's Way, Inc.

cc: Governor Frank O'Bannon
cc: Mayor John Fernandez
cc: Indiana Department of Transportation

1101-017

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW. USE THE REVERSE SIDE, IF NECESSARY.

We strongly object to any new terrain highway or any new terrain I69 alternative. All new terrain alternatives cause unnecessary and unacceptable environmental damage, as well as unacceptable (& irreplaceable) loss of essential farmland and natural resources.

We note, in addition, that what should be a balanced cost - benefit analysis is very biased, focusing on economic benefits for the few. The analysis does not incorporate both real and more-difficult-to-quantify-costs to the people of southwestern Indiana. Where is the analysis of the adverse economic impacts of the environmental damage that will be caused by any new terrain alternative. Water quality declines and air quality declines will have both direct and indirect adverse economic impacts, as will the loss of natural resources and farmlands. Indirect impacts being ignored include the health impacts - increases in asthma from the increased PM10/PM2.5 generated by the highway is only one example of 5.5

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1101-021

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such ignored costs. Where in this study are the economic costs to the healthcare system from the increased air and water pollution? Where in this study are the economic costs to each local rural economy from the need to put people on centralized water systems because their well water is unacceptable contaminated. And, based on comments made tonight, INDOT would be well advised to add to the building costs the increased security that will no doubt be needed if they try to build a new terrain route. 5.5 5.25

All new terrain routes cost millions of dollars more than Alternative 1 or leaving the highway system as it is. These millions of dollars would be better spent on improving the roads we have, or, even better, improving our kids' education. Furthermore, why spend millions and millions of dollars (especially when state funds are short) just to save 20 minutes off a 4 hour trip. What a phenomenal waste of money for such a poor return on your investment.

Name Diane Henshel & Artemis Walden

Address 4121 Cadbury Court

City/State/Zip Bloomington IN 47401

We politely request that I-69 be put to a state-wide referendum before any more public funds are used for this pork barrel project!

October 23, 2002

TO: Michael Grovak, Project Manager, Bernardin, Lochmueller & Associates, 6200 Vogel Road, Evansville, IN 47715

FROM: Sarah Elizabeth Frey, 2625 South Smith Road, Bloomington, Indiana 47401

RE: Proposed New Terrain I-69 Highway from Indianapolis to Evansville, Indiana

THIS IS ANOTHER NO NEW TERRAIN ADVOCATE REPORTING IN AGAINST INDOT's PROPOSED NEW TERRAIN ROUTES FOR THE PROJECTED I-69 INTERSTATE FROM INDIANAPOLIS TO EVANSVILLE-----and FOR THE COMMON SENSE CITIZEN'S REQUESTED ROUTE OF I-70 FROM INDIANAPOLIS TO BYPASS OF TERRE HAUTE CONNECTING WITH US 41 SOUTH TO EVANSVILLE.

I have written a similar letter many times to INDOT, Governor O"Bannon and assorted politicians and know that our NO NEW TERRAIN arguments are as sound today as they were at the beginning. Even more so since saving hundreds of millions of dollars means substantially more today given the state of our economy.

Perhaps not surprising but still shocking was the omission of the I-70/US 41 from the Preferred Routes. Democracy begins from the bottom-up and the people's voice has consistently spoken for NO NEW TERRAIN and minimizing consumption of new terrain along US 41 as well.

I drive to Texas several times a year from my home in Bloomington via Bloomfield and then south on SR57 to I-64, passing Evansville enroute to I-57 in Illinois, to I-55 in Missouri etc etc.. I really enjoy that route south and even the towns of Washington and Petersburg on Indiana 57 are not really drags. I consistently make good time on SR 57.

I have friends who have driven I-70/41 from Indianapolis to Evansville and the proposed alternative routes as nearly as one can and do not believe TIME would be much of a factor, although SEMIS would roar faster than they do now and that lessens safety, too.

It boils down for me to the fact that the farmland and woods that would be consumed in the process of building some of the preferred alternatives is unacceptable and would have many adverse effects on the people of that region as well as encouraging a type of sprawl we are trying to plan against. We need to preserve our farmland and woodlands.

Nicol mentions as a negative for the I-70/SR41 route that many small businesses would be lost. Improving that route could also work as an advantage to small businesses. Nicol seems to believe that we do not consider all the factors involved but we believe that he, Governor O'Bannon and many Chambers of Commerce along the Preferred Routes with their one-track minds intending to push it through where they want it come hell or high water is the real 5.5

problem.

I have a personal road problem that eclipses all other road problems for me, as I live on a horse and buggy road in Monroe County in a home on the only dangerous curve on that road (double right angles). South Smith Road changes to Rogers Road at the west curve and goes straight to a roundabout at S. High Street where it becomes Winslow Road that proceeds to south Walnut Street.

To make a long story short, since Lake Monroe was built as our WATER SUPPLY in 1965 Monroe County/City of Bloomington and Indiana University have grown rapidly and subdivisions are going up now at an unbelievable rate from end to end without the infrastructure needed to take care of this rapid growth and it is particularly dangerous now with all the heavy hi-hft trucks carrying supplies etc. We still have the Huntington Farm and part of the old Sinn Farm growing corn and soybeans and we still hope that they will be preserved.

Dr. Dan Grossman sold his Arabian Horse Farm (across the road from me) to developers some years ago and the mansions going up there surpass those in Hyde Park that is adjacent. At the same time he sold to the developers he sold enough land to Monroe County to soften the curves but nothing has been done about eliminating or even softening the curves.

At one time the Curve Project reached top priority only to be slammed back by Bill Williams, County Highway Superintendent to many years in the future. The road is narrow by any standards for the traffic it bears and has little berm most of its distance but does have very tall power line polls and telephone polls almost on the road itself in places. As I have said it is a horse and buggy road with wealthiest subdivisions bordering it---a scandalous situation.

Early on my husband and I contacted INDOT about it but were told it was a local "thing". So it goes.....

Nevertheless, I think funds should be provided for small projects like this with notable safety concerns and not invest in endless (it seems) planning for a Super Highway to which there are very strong objections to the preferred alternatives but whose objectors offer a good alternative in I-70/SR41.

Yours sincerely,

Sarah Elizabeth Frey

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

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PLEASE ENTER YOUR COMMENTS BELOW.

(1) Your Environmental Impact Study is alarmingly flawed & incomplete.

(2) The impact Study does not taken into account Personal Losses 5.5

(3) You are personally invited to my home so that I can SHOW you how YOUR highway would change our lives.

(4) No New-Terrain I-69

(5) NO. I-69 Extension

(6) Upgrade US 41 & use it

RECEIVED
NOV - 4 2002
BLA

1104-139

Name Mary Ann Dunfee

Address Rt 3, Box 484

City/State/Zip Spencer, IN 47460

Michael Grovak
Bernardin, Lochmueller & Assoc
6200 Vogel Rd
Eveansville, IN 47715
RE: Interstate 69 in southern Indiana

I am a registered voter and small business owner in Bloomington, Monroe County, Indiana. I own 3 properties, one of which lies near the middle of the 2000 foot zone of proposed route 3B. I have just finished a two year, $20,000 renovation and addition to this property and had planed another $18,000 addition. I worked weekends and evenings on my home, useing top materials of hardwood, tile and limestone. Now it will be demolished or worse, left standing next to an interstate highway.

I have only recently found out that I am on this route. This because someone (not the state) stuck a map in my mail box. Otherwise, I would not have known still. You have by virtue of proposing these routes, made it impossible for me to sell my property at this time or to go forward with the planned addition.

My worst fear is that you will use route 3B and not buy my property thereby reducing my property value and equity by thousands of dollars so that I cannot afford to sell and leaving me to enjoy looking and listening to the interstate day and night. Has the impact study calculated in the loss of property values of those who fall outside the imminent domain buy zone, but whose property may still suffer a devaluation? Will the state pay me the difference in value? Will the state pay the cost of my unwanted moving? 5.5

I am opposed to any routes that come through Monroe County. I am opposed to any new terrain highway in any county. I am opposed to the money this project will devour. I am opposed to the physical and social divisions that an interstate usually brings to a city or county.

I suggest using this money to extend Indiana 37, 67, 57 and 41 as a four lane. I favor adding grade separations and generally upgrading existing roads.

Please stop and think before you spend our money. The objective is to get people and products from one place to another in the least destructive, least disruptive and least costly way possible. We don't need an interstate to accomplish this. Use existing roads!

Please help to stop this waste of tax money.

Sincerely, 1104-038

Mark Anderson
3400 Arlington Rd
Bloomington, IN 47404
812-339-1200
sales@zuchinniprints.com

JOSEPH & CATHY JACKSON
173 E SAMPLE RD
BLOOMINGTON, IN 47408

To whom it may concern:

This is in response to the proposed new terrain I-69 and the effect this will have on my family and my business if the Highway 37 route is used.

We currently own eighty acres on the northeast side of Sample Road with the front half of the acreage as pasture. We also have three houses and two barns on the front part of this land. The land is currently used to raise Quarter horses.

My wife was raised on this land and it is now in the 5th generation of her family. I, myself, have worked this land for over thirty years to get the property the way we now have it.

On the southeast side of Sample Road is Wylie's Floor Covering, on 7.78 acres and this is a prime location. If I-69 comes thru this area and a cloverleaf is to be built at Sample Road it will completely destroy us and all we have strived for. It will take away my pasture land, barns and homes. It will also take our business which was started by my father-in-law and again, which I have worked for over thirty years. There are three partners in this business now and without a building it will make it almost impossible to sell the business, let alone find a location in the area like this one. We would be forced to close.

Closing this business will not only be a hardship for us but for the local and state economy as much of our work is done for commercial businesses, schools, hospitals, etc. not only in Monroe County but outside as well. This will cause a loss in annual taxes of $7,233.00; a loss of eleven employees at a gross income of $309,276.00 plus the loss of accountant's services of $785.00 and an attorney on retainer of $2400.00 per year. This is in addition to the loss of income to our supplier's and local banks and business we deal with. The taxes lost on our farmland and homes would amount to $1247.00 to Monroe County which can ill afford this loss. 5.5

This is something the state needs to think about especially in light of the huge deficit we find ourselves in at this time. Multiply this by all the larger businesses that will be affected, the homes that will be destroyed and it seems that the cost of bringing I-69 through here just skyrockets. It has been proven that there are easier and cheaper areas where the road can be built also with less economic impact.

For myself personally, if I-69 does become a nightmare come true for us, my wife and I have thought seriously to take our horses and moving out west where the likelihood of government taking your land would be much less a threat.

I urge you to reconsider this route. There are many areas that are begging to have the highway come through. We are not one of them.

Sincerely,

1031-015
Joseph Jackson
11/3/02

Subj: DEIS Comments
Date: 11/5/02 9:51:24 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Del Fanning
Address = 1177 N Dogwood Drive
City = Vincennes
State = IN
ZIP = 47591
Email = dtmfann@vincennes.net
Message = I have several comments on the I-69 project. I support the upgrade of US41/I-70 instead of the new terran route. The reasons are;
1) What will happen to all the businesses on 41 when the new road is built. Many will have to shut down do to decreased traffic. 5.5
2) No one ever talks about the expense to upgrade hiway 37 from Bloomington to Indy. There are just as many stop lights on this road as on 41, and how expensive will a bypass around Martinsville be? Why have no figures for these upgrades been discussed?
3) Why do you think I-70 will need more lanes? The trucks are already using that route, because they sure wont drive 57 or 67 or 45 because of the narrow lanes, hills, and curves. Where will all this extra traffic come from? Again, they are already driving i-70.
4) Time savings from Evansville to Indy. Get rid of the stop lights on 41 and build the bypass around Terre Haute, and you can save easily 20 minutes drive time. The bypass around Terre Haute is a done deal, and should not be included in the total cost of the poject because it will be built regardless of where i-69 goes.
5) We must be responsible. The state is $1 billion in the red this year. Building the new terran route will tie up money for years in construction and buying right of way that the state simply does not have. How many other roads will fall into disrepair because we are spending the entire budget on a new hiway.
For these reasons, we must look at the upgrade of US 41/I-70 as the best way to serve the people of Indiana and keep I-69 within our borders. Thanks.

1105-034 Fanning, Del.wpd

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

DEAR Friends & Neighbors,

Thank you for this opportunity to express myself concerning I-69. I will try to express my personal concerns without going into lengthy details. I have paid attention & listened to many points of view before forming an opinion - Thank you for reading mine!

I truly believe that construction of a new terrain highway for automobiles is a ridiculous waste of our hard-earned tax dollars. When I think of the waste of our dwindling natural resources, I feel sick to my stomach. Would you ask your neighbor to move, or personally destroy the Amish way of life? Why would I ask my State to do that kind of disagreeable dirty work - just so I save a few minutes from my commute? A road to move vehicles faster & faster in this fast-paced life by dividing neighborhoods & communities blessed with a slower way of life is a SIN. We're not talking about a bike path, but that would be something worth paying for. Why is it that the Monroe County Humane Association must ask private individuals for donations to pay for a much-needed shelter costing $2.5 million but we are able to cough up Billions for a car-pool 5.7

Name BONNIE GORDON-LUCAS

Address 3375 N Russell Rd

1022-014 BLOOMINGTON IN 47408

RECEIVED
OCT 22 2002

MONROE COUNTY HIGHWAY DEPARTMENT

November 4, 2002

Lyle Sadler, Project Manager
Indiana Department of Transportation
100 North Senate Avenue, Room N855
Indianapolis, Indiana 46204-2218

Mike Grovak, Project Manager
Bernardin, Lochmueller & Associates, Inc.
6200 Vogel Road
Evansville, Indiana 47715

RE: I-69 Tier 1 Draft Environmental Impact Statement Comments;
Alternative 3 Affect on Monroe County Road System.

Dear Mr. Sadler and Mr. Grovak:

Please find enclosed a copy of a report titled "I-69 Monroe County Road Impacts by Route" which specifically identifies the impacts of I-69, Alternate 3, on our road system. This report was prepared after a review of the DEIS for this corridor. The report does not select a preferred route along Alternate 3, given three options being considered through Monroe County, but makes comments on the affect of traffic flow that each one would have on a particular area if it were constructed at that location. 5.8

It is anticipated that the Indiana Department of Transportation and their design consultants will cooperatively work with Monroe County on minimizing the affect an interstate would have on the traffic flow in and around our County, should an alternate be selected in this area. Specifically, we expect the Federal Highway Administration and the Indiana Department of Transportation to fund and construct frontage roads, grade separations and interchanges at critical locations in order to maintain a high degree of safety for the public and our emergency response personnel.

Thank you for the opportunity to submit this information and hope that it will be of benefit to the INDOT, FHWA and Monroe County in future discussions on this project. If you have any questions or comments, please contact me at your convenience.

Sincerely,

Bill Williams

1104-063

Bill Williams
Monroe County Highway Engineer

Cc: Monroe County Board of Commissioners

Enclosure

COURTHOUSE, ROOM 325 : BLOOMINGTON, INDIANA : 47404
PHONE: (812) 349-2555 : FAX: (812) 349-2959
WWW.CO.MONROE.IN.US

MONROE COUNTY DEPARTMENT OF HIGHWAYS

I-69

Monroe County Road Impacts by Route

Prepared by:
Bill Williams
Monroe County Highway Engineer
October 15, 2002

Introduction

This report was prepared to use as a guide for the review of the impacts the construction of I-69 would have on the road system of the Monroe County Highway Department. It reviews the entire 2 mile wide Study Band and, in some instances, discusses possible affects on the road network outside of that study boundary.

The report focuses on information provided to this office by the Indiana Department of Transportation and their consultant, Bernardin, Lochmueller and Associates, Inc., specifically a report titled "I-69 Evansville to Indianapolis Tier 1 Draft Environmental Impact Statement", dated July of 2002.

The report does not select a preferred route in Monroe County but does discuss the traffic issues related to an area in or near the Study Band of one of three alternates that are proposed in our County.

As with most projects of this magnitude, it is anticipated that additional public comment will be afforded as the plans are developed once a route is chosen by the INDOT. This is in accordance with current Federal Highway Adminstration rules and regulations.

The specific alternates, Alternate 3A, Alternate 3B and Alternate 3 C, all traverse through Monroe County. Alternate 3A is not a preferred alternate, as stated in the Draft EIS. It has been reviewed with the other alternates in order to provide information to the INDOT and FHWA.

We expect the Federal Highway Administration and the Indiana Department of Transportation to fund and construct frontage roads, grade separations and interchanges at critical locations in order to maintain a high degree of safety for the public and our emergency response personnel. Most of those locations have been identified in this report, however, due to Monroe County being a County that is continuing to develop at a rapid pace, this report is by no means conclusive and will require further study once a route is selected.

Comments regarding this report should be directed to Bill Willliams, Monroe County Highway Engineer, Courthouse, Room 323, Bloomington, Indiana, 47404 or by calling (812) 349-2555.

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3A

INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
			Alternate enters Monroe County in Indian Creek Township, Section 19, at Greene County Line.
Rockeast Road / Greene County CR 1375	GS	MiC	This segment is in Greene County, but will have an impact on traffic movements in Monroe County. The grade separation will guarantee continued utility known during preconstruction. (pg. 14 of 32)
Carmichael Road	GS	MiC	This grade separation is in Greene County, but will have an impact on traffic movements in Monroe County. The grade separation will guarantee continued utility known during preconstruction. Major County road realignment anticipated. (pg. 14 and 15 of 32)
Thacker Road	NA	L	The intersection with Greene County Road 1375 is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor. (pg. 14 and 15 of 32)
Breeden Road	NA	MiC	All of this road is in the Study Band. This road is extremely important to traffic movements in this part of the County. Currently not proposed to be disturbed by this route. (pg. 14 and 15 of 32)
Crum Road	NA	L	The intersection with Breeden Roads is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor. (pg. 15 of 32)
Graves Road	NA	L	The intersection with Breeden Road is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor. This road not indicated on the aerial maps. (pg. 15 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3A			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Carter Road	GS	L	The grade separation will guarantee continued utility known during preconstruction. (pg. 14 and 15 of 32)
Burch Road	NA	L	This road is in the Study Band. Currently not proposed to be disturbed by this route. (pg. 15 of 32)
Adams-Breeden Cemetery Road	C	L	This short roadway is not indicated on the aerial maps. The cemetery is not indicated on the aerial map either. (pg. 15 of 32)
Sparks Road	NA	L	Construction along this roadway is not currently proposed, therefore, traffic movement changes are not anticipated. Road not indicated on aerial maps. Outside of Study Corridor. (pg. 15 of 32)
State Road 45	I	MA	An interchange is anticipated at this location, approximately 1,000' west of the Monroe Greene County Line. (pg. 15 of 32)
Elwren Road	NA	L	Construction on this roadway is not anticipated, however, Greene County Road 1325, will be closed which may cause an increase in traffic movements on Stanford Road. Greene County Road 550N is a site listed as a potential grade separation which may assist with transfer of the traffic load in this area for vehicles attempting to travel to Greene County Road 1325. (pg. 15 of 32)
Stanford Road	NA	L	Outside Study Band but may be impacted by increased traffic from Greene County Road 1325 closure. (See Elwren Road for description) (pg. 15 of 32)
Gardner Road	NA	L	Construction along this roadway is not currently proposed The road leads to Greene County Road 780N of which a grade separation is proposed at this time, therefore, traffic movement changes are not anticipated.. Outside of Study Corridor. (pg. 25 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3A			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Rice Road	NA	L	Construction along this roadway is not proposed. Currently a dead end road. Road located in Study Band. (pg. 25 of 32)
State Road 43	C ?	MaC	This road is in the Study Corridor. The segment south of Whitehall has not been addressed with respect to what it's future is. It could be assumed that a frontage road will be constructed as part of this project. If not, additional traffic will be placed on Garrison Chapel Road.
Hendrick Road	NA	L	Construction along this roadway is not proposed. Currently a dead end road. Road located in Study Band. (pg. 25 of 32)
State Road 48	I	MaC	An interchange is anticipated at this location, approximately 1,200' east of the existing intersection of Vernal Pike. (pg. 25 of 32)
Garrison Chapel Rd	NA	MiC	Construction along this roadway is not proposed. Could receive increase traffic. Dependent upon State Road 43 improvements, south of Whitehall. (pg. 25 of 32)
Vernal Pike	C	MaC	This road is impacted from the intersection of State Road 48 to east of its intersection with Thomas Road. The west end at SR 48 is on the working alignment at two locations. Would require the construction of a frontage road along the east side of proposed route to maintain existing traffic flow. If not constructed, would increase traffic on SR 48, Oard Road and Hartstraight Road. (pg. 25 of 32)
Howard Road	C	MiC	This road would be closed at Louden Road. Would require the construction of a frontage road to the proposed grade separation at Thomas Road in order to maintain existing traffic flow. If frontage road not constructed, would increase traffic on Ratliff Road. (pg. 25 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3A			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Louden Road	C	L	This road would be closed at Howard Road. Would require the intersection with Howard Road to be relocated (see Howard Road). (pg. 25 of 32)
Starnes Road	NA	L	Construction along this roadway is not proposed, however, any closures in the Howard Road, Louden Road, and Vernal Pike area will impact this road segment. (Pg. 25 of 32)
Oard Road	NA	L	Construction along this roadway is not proposed, however, any closures in the Thomas Road and Vernal Pike area will impact this road segment. (pg. 25 of 32)
Thomas Road	GS	MiC	The grade separation will guarantee continued utility known during preconstruction. This road segment will be impacted by closure of Vernal Pike, Howard Road and Louden Road. (pg. 25 of 32)
Hartstraight Road	GS	MaC	This grade separation will guarantee continued utility known during preconstruction. This roadway is classified as a Major Collector, therefore any structures constructed should consider the future widening of Union Valley Road. (pg. 17 and 25 of 32)
Seiku Court	NA	L	The west end of this roadway is in the Study Corridor of this route. A new cul-de-sac may need to be constructed to accommodate turning movements. No traffic impact to existing road network. (pg. 17 of 32)
Ratliff Road	C	L	Existing intersection at Hartstraight Road and Woodyard Road would be closed. This location is near Working Alignment. It appears a new grade separation will be constructed north of Woodyard Road, anticipating a new frontage road for this area and an additional access to Westbrook Downs Subdivision. (pg. 17 and 25 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3A			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Woodyard Road	C	MaC	Existing intersection at Hartstraight Road and Ratliff Road would be closed. This location is near Working Alignment. It appears a new grade separation will be constructed north of Woodyard Road, anticipating a new frontage road for this area and an additional access to Westbrook Downs Subdivision. (pg. 17 and 25 of 32)
Walcott Road	NA	L	Construction along this roadway is not proposed, however, any closures in the Hartstraight Road and Woodyard Road are will impact this road segment. (pg. 17 of 32)
Harbison Road	NA	L	Construction along this roadway is not proposed. Currently a dead end road, maintained by the Town of Ellettsville. (pg. 17 of 32)
Old State Road 46	C	L	This road segment is on the Working Alignment of this route. Currently, this road is closed at the bridge over a tributary of Jack's Defeat Creek, therefore, would not impact traffic patterns with its closure. (pg. 17 of 32)
Westbrook Downs Subdivision	C	L	Brookbank Drive, Dunleith Drive, Brookwood Drive and Ridgewood Drive are all in the Study Corridor. Would require street relocations and cul-de-sac construction. The intersection of Ridgewood Drive with State Road 46 may need to be relocated given the proximity of the State Road 46 interchange west of the existing intersection. (pg. 17 of 32)
State Road 46	I	PA	An interchange is anticipated at this location, approximately 1,000' east of the Lakeview Road and west of Jack's Defeat Creek Mall. (pg. 17 of 32)
Lakeview Drive	NA	L	The intersection with State Road 46 is in the Study Corridor. It is important that this road remain tied to SR 46 for traffic flow to and from the Meadowland and Kelly Heights Subdivisions. (pg. 17 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3A

INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Love Lane	C	L	This road segment is at the interchange of State Road 46. Access to this area would require a frontage road be constructed to Lakeview Drive, thus increasing traffic on that road segment and the intersection with State Road 46 at that location. (pg. 17 of 32)
Autumn Hill Subdivision	C	L	Weathers Court, Autumn Circle, Summer Court and Harvest Lane are in the Study Corridor. Access throughout the subdivision would still be maintained by other interior streets, thus not causing increases on other area roadways. (pg. 17 of 32)
Forest Park Farms, Forest Park Heights, Woodgate, Deer Park, Meadow Woods, Lynnwood Estates, West Park, Maple Woods Addition, Perry Woods	NA	L	All of these subdivisions are in the Study Band however, construction is not anticipated on any of the interior streets of these subdivisions. Traffic flow will not be disrupted by this alignment within the subdivision. (pg. 17 and 26 of 32)
Tanglewood Drive (Ethan's Glen S/D)	C	L	The intersection of Tanglewood Drive and Union Valley Road is in the Study Corridor. This is the only entrance into this subdivision therefore, if construction is necessary at this location, it will require the entrance to be relocated along Union Valley Road. (pg. 26 of 32)
Union Valley Road	GS	MaC	This grade separation will guarantee continued utility known during preconstruction. This roadway is classified as a Major Collector, therefore any structures constructed should consider the future widening of Union Valley Road, possibly to four lanes at this location. (pg. 26 of 32)
Lost Man't Lane	NA	MaC	The each end of this roadway are in the Study Band of this route and route C. No construction is anticipated therefore, no adverse traffic impacts are anticipated to this road. (pg. 17 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3A

INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
McNeely Street	C	MiC	The intersection of this road and Union Valley Road are in the Study Corridor. This road is a Minor Collector, with Union Valley Road being a Major Collector. Both are vital to the traffic movements in this area. It is important for this road to remain open as a through corridor for this area. Frontage road could be constructed to maintain traffic flow in this area. (pg. 26 of 32)
Maple Grove Road	GS	MaC	This grade separation will guarantee continued utility known during preconstruction. This roadway is classified as a Major Collector, therefore any structures constructed should consider the future widening of Maple Grove Road. (pg. 26 of 32)
Delap Road	C	L	This road would be closed between Cowden Road and to a point east of Woodall Road. It is vital for access for emergency vehicles into this area. The detour due to this road closure would create a serious response time delay to this area. This closure will increase traffic along other area roadways. A frontage road to the nearest grade separation should be constructed. (pg. 26 of 32)
Cowden Road	NA	L	This road is in the Study Band however, construction is not anticipated along any of this road segment. It will experience increased traffic due to the Delap Road closure. (pg. 26 of 32)
Woodall Road	C	MaC	This roadway is in the Study Corridor and crosses the Working Alignment. It is proposed to be closed at that point. It is vital for access for emergency vehicles into this area. The detour due to this road closure would create a serious response time delay to this area. This closure will increase traffic along other area roadways. (pg. 26 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3A			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Woodland Road	NA	MaC	This road is in the Study Band however, construction is not anticipated along any of this road segment. It will experience increased traffic due to the Woodall Road closure. A frontage road to the nearest grade separation should be constructed. (pg. 26 of 32)
Old Maple Grove Road	NA	L	This road is in the Study Band however, construction is not anticipated along any of this road segment. It is currently closed at the south end however a new bridge is anticipated and partially funded. It will experience increased traffic due to the Woodall Road closure. (pg. 26 of 32)
Bottom Road	GS	MiC	This grade separation will guarantee continued utility known during preconstruction. This roadway is classified as a Minor Collector, therefore any structures constructed should consider the future widening of Bottom Road. (pg. 26 of 32)
Mt. Pleasant Road	C	L	This road is in the Study Corridor and is anticipated to be closed northwest of its Fry Road intersection and will be a concern at Bottom Road. It is vital for access for emergency vehicles into this area. The detour due to this road closure would create a serious response time delay to this area. This closure will increase traffic along other area roadways. (pg. 26 of 32)
Prather Road	C	L	This road's intersection with Mt. Pleasant Road is anticipated to be closed. It is vital for access for emergency vehicles into this area. The detour due to this road closure would create a serious response time delay to this area. This closure will increase traffic along other area roadways. (pg. 26 of 32)
Fry Road	NA	L	This road is in the Study Band however, construction is not anticipated along any of this road segment. It will experience increased traffic due to the Mt. Pleasant Road closure. (pg. 26 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3A			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Brown Road	C	L	This road will be closed at the Mt. Pleasant Road intersection. It is vital for access for emergency vehicles into this area. The detour due to this road closure would create a serious response time delay to this area. This closure will increase traffic along other area roadways. (pg. 26 of 32)
Burma Road	GS	L	This grade separation will guarantee continued utility known during preconstruction. This roadway is classified as a Minor Collector, therefore any structures constructed should consider the future widening of this road. (pg. 26 of 32)
			End Alt. 3A in Monroe County in Bean Blossom Township, Section 1, at Morgan County Line.

LEGEND:
I = INTERCHANGE
GS = POTENTIAL GRADE SEPARATION
C = POTENTIAL CLOSURE
NA = IN STUDY BAND; CONSTRUCTION NOT ANTICIPATED
FC = FUNCTIONAL CLASSIFICATION
PA = PRINCIPAL ARTERIAL
MA = MINOR ARTERIAL
MaC = MAJOR COLLECTOR
MiC = MINOR COLLECTOR

NOTES:
STUDY BAND = 2 MILES WIDE
STUDY CORRIDOR = 420' - 2000' WIDE
WORKING ALIGNMENT = < 420' WIDE

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3B			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
			This alternate uses 3A until the Thomas Road grade separation, of which at that point the alignment is easterly instead of northeasterly as with 3A. (page 25 of 32)
Thomas Road	GS	MiC	The grade separation will guarantee continued utility known during preconstruction. This road segment will be impacted by closure of Vernal Pike, Howard Road and Louden Road. (pg. 25 of 32)
Hartstraight Road	GS	MaC	This grade separation will guarantee continued utility known during preconstruction. This roadway is classified as a Major Collector, therefore any structures constructed should consider the future widening of Union Valley Road. (page 17 and 25 of 32)
Vernal Pike	C	MaC & MiC	This road is impacted from the intersection of State Road 48 to east of its intersection with Thomas Road. The west end at SR 48 is on the working alignment at two locations. Would require the construction of a frontage road along the east side of proposed route to maintain existing traffic flow. If not constructed, would increase traffic on SR 48, Oard Road and Hartstraight Road. (page 17 and 25 of 32)
Walcott Lane	NA	L	This roadway is in the Study Band of this route. No construction is anticipated therefore, no adverse traffic impacts are anticipated to this road. (page 17 and 25 of 32)
Woodyard Road	GS	MaC	This grade separation will guarantee continued utility known during preconstruction. This roadway is classified as a Major Collector, therefore any structures constructed should consider the future widening of Woodyard Road. (page 17 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3B			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Smith Pike	GS	MaC	This grade separation will guarantee continued utility known during preconstruction. This roadway is classified as a Major Collector, therefore any structures constructed should consider the future widening of Smith Pike. (page 17 of 32)
Bloomington Township TIF Area	C	MaC	This alternate cuts this TIF District in half. It will extremely important to tie the road system in this TIF District to the Curry Pike intersection in order to maintain utility for this area and to maintain traffic flow north and south of the proposed interstate. (page 17 of 32)
Curry Pike (proposed)	C	MA	This alternate traverses into an area that will be close to the proposed new alignment for Curry Pike. It is vital that Curry Pike tie into this or the State Road 46 interchange in a manner that will still service our industrial area and allow this roadway to provide utility to this segment of our community. It is in the Working Alignment of this proposal. (page 17 of 32)
Hunter Valley Road	NA	MaC	This roadway is also known as Curry Pike, north of State Road 46, in the Bloomington Township TIF District. As mentioned above, it is important to keep access to our industrial areas, existing and proposed, and should be connected via a grade separation or constructed into the State Road 46 interchange ramping system. It is at the edge of the Study Corridor, therefore, could act as a frontage road as anticipated in the County Thoroughfare Plan. (page 17 of 32)
Maple Grove Road	NA	MaC	This roadway is in the Study Band of this route. No construction is anticipated therefore, no adverse traffic impacts are anticipated to this road. Traffic may be increased with the closure of Acuff Road. (page 17 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3B			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Stoute's Creek Road	NA	L	This roadway is in the Study Band of this route. No construction is anticipated therefore, no adverse traffic impacts are anticipated to this road. (page 17 of 32)
Northwest Woods and Stoneybrook Additions	C	L	Roadways within these subdivisions, along with the homes, are in the Study Corridor and portions, or all, will be removed if this alternate is chosen. All of Northwest Woods and the southern portion of Stoneybrook are in the Working Alignment. If any portion of these subdivisions remain, access shall be provided to Arlington Road. (page 17 of 32)
Lancaster Park and Upper Flanders	NA	L	All of these subdivisions are in the Study Band however, construction is not anticipated on any of the interior streets of these subdivisions. Traffic flow will not be disrupted by this alignment within the subdivision. (pg. 17 of 32)
Arlington Road (Old State Road 46)	GS	PA	This grade separation will guarantee continued utility known during preconstruction. This roadway will probably be downgraded from a Principal Arterial to a Major Collector after new State Road 46 is opened. Any structures constructed should consider the future widening of this roadway. (page 17 of 32)
State Road 37	GS	PA	This grade separation will guarantee continued utility known during preconstruction. (page 17 of 32)
Prow Road	C	L	This road is along the Working Alignment of this alternate and will be closed or relocated to the east, acting as a frontage road for Bloomington North High School. It should be constructed in order to maintain traffic flow to this area, thus not redirecting from a closure to Kinser Pike and other area roadways. (page 17 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3B			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Acuff Road	C	MaC	A portion of this roadway is in the Working Alignment of this alternate and will be closed. If Prow Road is relocated, it should be connected to this roadway in order to maintain traffic flow in this area. The segment west of State Road 37 could still be accessed by State Road 37. (page 17 of 32)
Fritz Terrace, North High School, subdivisions north of BNHS and Cascades Golf Coarse	NA	L	All of this area is in the Study Band however, construction is not anticipated on any of the interior streets of these subdivisions. Traffic flow will not be disrupted by this alignment within the subdivision. (pg. 17 of 32)
Kinser Pike	I	MaC	An interchange is proposed where this intersection and State Road 37 meet the Working Alignment of this alternate. Kinser Pike should be incorporated into the design for access in order to maintain traffic flows. See Bell Road for access issues to Kinser Pike on the west side of this interchange. (page 17 of 32)
Bayles Road	NA	MaC	The west end of this roadway is in the Study Band of this route. No construction is anticipated. It is anticipated that, if Kinser Pike does tie into the interstate via an interchange, this road will experience increased traffic and should be improved to accommodate the additional traffic. (page 17 and 25 of 32)
Bell Road	C	L	This roadway may be closed on the west side of the interchange. This would require traffic from the homes along this road to traverse north on Kinser Pike to the interchange at Business 37 North in order to travel south into Bloomington. Consideration should be give to access via a ramp to this location. (page 17 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3B			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Walnut Street	I	MA	This interchange will remain. It should be modified to accommodate traffic movements along the interstate wanting to traverse east or west of the interstate. This will serve the Bottom Road and Maple Grove Road areas if completed as proposed. (page 18 of 32)
Whisnand Road	NA	MaC	The west end of this roadway is in the Study Band of this route. No construction is anticipated, therefore, no adverse traffic impact is anticipated. (page 18 of 32)
Bottom Road	C	MaC	This intersection would be closed. It is important to connect this roadway to the ramp system at Walnut Street in order to maintain traffic flow to the west side of the interstate. If not constructed, it would increase traffic on other area roadways, for persons trying to travel to this part of the County. (page 18 of 32)
Mel Curry Road / Showers Road / Wylie Road / Hoosier Energy Road / Wayport Road	C	L	These roads are within the Study Corridor of this alignment and their intersections with the proposed interstate will be closed. It will be necessary for a frontage road system be constructed, eventually connecting with a grade separation or an interchange along the interstate in order to maintain access to the existing homes in this area and to assist with emergency response to the area. There are other homes that have direct access onto State Road 37 that will have to utilize this frontage road for access to their lot. (page 18 of 32)
Lawson Road	NA	L	This roadway is in the Study Band of this route. No construction is anticipated, therefore, no adverse traffic impact is anticipated. (page 18 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3B			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Sample Road	I	MaC	An interchange is proposed where this intersection and State Road 37 exist today, which is the Working Alignment of this alternate. This would be the logical location to connect frontage roads in this area of the County. Sample Road will need to be upgraded due to the anticipated increase in traffic to this roadway. (page 18 of 32)
Simpson Chapel Road, Winery Road, Lee Paul Road, Fox Hollow Road, Cross Over Road, Dittemore Road, Chambers Pike, Sylvan Lane, Burma Road, Wyatt Road, and Bryant's Creek Road	C	MiC & L	These roadways connect onto the Working Alignment (State Road 37) and will be closed. As proposed in the Monroe County Thoroughfare Plan, these roads should be connected with a frontage road system. It is also advisable to construct a grade separation at Chambers Pike / Dittemore Road in order to maintain east-west traffic flow in this area of the County. Again, there are many homes that have direct access onto State Road 37 in this area. (page 18 of 32)
			End Alt. 3B in Monroe County / Morgan County Line in Washington Township, Section 3.

LEGEND:
I = INTERCHANGE
GS = POTENTIAL GRADE SEPARATION
C = POTENTIAL CLOSURE
NA = IN STUDY BAND; CONSTRUCTION NOT ANTICIPATED
FC = FUNCTIONAL CLASSIFICATION
PA = PRINCIPAL ARTERIAL
MA = MINOR ARTERIAL
MaC = MAJOR COLLECTOR
MiC = MINOR COLLECTOR

NOTES:
STUDY BAND = 2 MILES WIDE
STUDY CORRIDOR = 420' - 2000' WIDE
WORKING ALIGNMENT = < 420' WIDE

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3C			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
			This alternate uses 3A until Section 6 of Indian Creek Township, where at that point the alignment is easterly instead of north as with 3A. (page 15 of 32)
Breeden Road	GS	MiC	The grade separation will guarantee continued utility known during preconstruction. All of this road is in the Study Band. (pg. 14 and 15 of 32)
Burch Road	GS	L	The grade separation will guarantee continued utility known during preconstruction. (pg. 15 of 32)
Tom Phillips Road	NA	L	The intersections with Burch and Breeden Roads are proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor, but inside the Study Band. (pg. 15 of 32)
Evans Road	C	L	All of the road is within the Study Band and over half is in the Study Corridor. Major impact to traffic movements generated this road. Will require construction of a frontage road in order to maintain access to adjacent properties. Existing traffic count is (pg. 15 of 32)
Evans Lane	C	L	All of the road is within the Study Band and over half is in the Study Corridor. Major impact to traffic movements generated this road. Will require construction of a frontage road in order to maintain access to adjacent properties. Existing traffic count is (pg. 15 of 32)
Kirksville Road	NA	L	The intersection with Harmony Road is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor. (pg. 15 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3C			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Harmony Road	GS	MiC	The grade separation will guarantee continued utility known during preconstruction. (pg. 15 of 32)
Mount Zion Road	NA	L	The intersection with Harmony Road is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor. (pg. 15 of 32)
Koontz Road	NA	L	The roadway is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor, however in the Study Band. (pg. 15 and 16 of 32)
Duvall Road	NA	L	The roadway is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor, however in the Study Band. (pg. 15 and 16 of 32)
Rockport Road	GS	MaC	The grade separation will guarantee continued utility known during preconstruction. (pg. 16 of 32)
Lodge Road	C	L	The grade separation for Rockport Road is in the vicinity of where Lodge Road intersects with Rockport Road. It is near the Working Alignment for the interstate. This road must continue to maintain access to Rockport Road since it is a dead end road. (page 16 of 32)
Evans Road	C	L	The grade separation for Rockport Road is in the vicinity of where Evans Road intersects with Rockport Road. It is in the Study Corridor for the interstate. This road must continue to maintain access to Rockport Road since it is a dead end road. (page 16 of 32)
Milton Road	NA	L	The roadway is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor, however in the Study Band. (page16 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3C			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Victor Pike	NA	MaC	The roadway is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor, however in the Study Band. (page16 of 32)
Tramway Road	GS	L	The grade separation will guarantee continued utility known during preconstruction. (pg. 16 of 32)
May Road	NA	L	The roadway is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor, however in the Study Band. (page16 of 32)
Fluck Mill Road	NA	MaC	The roadway is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor, however in the Study Band. (page16 of 32)
Mamie Eads Road	NA	L	The roadway is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor, however in the Study Band. (page16 of 32)
Ketcham Road	NA	MaC	The roadway is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor, however in the Study Band. (page16 of 32)
Dillman Road and Dillman Lane --	NA	L	The roadway is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor, however in the Study Band. (page16 of 32)
Bolin Lane	GS	L	This grade separation will guarantee continued utility know during preconstruction. (page 16 of 32)
Farmer's Field and Rolling Glenn Subdivisions	C	L	These subdivisions will be impacted by the construction of the interstate along this alignment. Both subdivisions have other options for access however efforts should be made to maintain their accesses onto Bolin Lane. (page 16 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3C			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Wexford Drive	NA	L	This roadway connects with Victor Pike and is a dead end road. It is not indicated on the aerial photo. It is located in the Study Band. The road should remain open to Victor Pike in order to maintain the only access to the homes in this subdivision. (page 16 of 32)
State Road 37	I	PA	The interstate connects at a point north of Victor Pike. As proposed in the Monroe County Thoroughfare Plan, a road segment from this interchange should be constructed to the east to connect to That Road, proposed to be closed with the construction of this alignment. This will improve traffic movements on the south side of Bloomington. It is anticipated that the interstate will utilize the existing Rights-of-Way of State Road 37, only needing to acquire more at the proposed new grade separations and interchanges, therefore, minimally impacting adjacent subdivisions along the west side of the proposed interstate. (page 17 of 32)
That Road	C	MaC	This intersection is proposed to be closed. It will not adversely impact traffic movements provided the construction mentioned in the State Road 37 section of this report and a frontage road is connected to Rockport Road, possibly continuing north to Tapp Road. This would allow traffic movements similar to preconstruction. (page 17 of 32)
East Lane --	NA	L	The roadway is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Must maintain access to That Road for home access. Inside of Study Corridor. (page17 of 32)
Rockport Road	GS	MaC	This grade separation is extremely important to traffic flow in this area, given the closure of That Road at State Road 37. The frontage road system should continue north and south of this roadway to maintain traffic flow. (page 17 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3C			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
Fullerton Pike	I	MA & MaC	The construction of an interchange at this location is vital to traffic movements to the interstate from the south side of Bloomington, especially since the Tapp Road intersection will not be connected to the interstate This will require special funding assistance from the INDOT to assure that the construction of Fullerton Pike, from the interstate to Walnut Street, is provided. (page 17 of 32)
Leonard Springs Road	NA	MaC	The roadway is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor, however in the Study Band. (page17 of 32)
Tapp Road	GS	MA	This grade separation will maintain east-west traffic flow but will create have an adverse impact on those vehicles wanting to access the interstate as they do with State Road 37 today. The nearest interchanges to this roadway will be either State Road 45, which would impact Tapp Road, west of State Road 37, Weimer Road, and State Road 45, by increasing the traffic flow on these roadways. The other interchange is proposed to be at Fullerton Pike which would increase Leonard Springs Road and Rockport Road's traffic flow. Consideration should be given to a collector-distributor type design that would allow access to merge at or near the State Road 45 interchange. Otherwise, again, INDOT funds for improvements to the roads mentioned should be earmarked for those areas. Any construction will require removal of the homes located in the northeast corner of Van Buren Park Subdivision. (page 17 of 32)
State Road 45	I	PA	The existing interchange will remain in place. Modifications to accommodate additional traffic may be required. The construction of a frontage road system will assist with traffic flow in this area. The frontage road could utilize existing roads such as Liberty Drive, Gates Drive, Industrial Drive and a new road north of Vernal Pike, connecting to Curry Pike. This system is part of the Monroe County Thoroughfare Plan. (page 17 of 32)

I-69 MONROE COUNTY ROAD IMPACTS BY ROUTE - ALTERNATE 3C			
INFORMATION ON AREA / COUNTY ROAD NAME	PROPOSED CONSTRUC-TION	FC	COMMENTS
State Road 48	I	PA	The existing interchange will remain in place. Modifications to accommodate additional traffic may be required. See frontage road system described in State Road 45 comments. (page 17 of 32)
Vernal Pike	GS	MA	This grade separation will maintain east-west traffic flow but will create have an adverse impact on those vehicles wanting to access the interstate as they do with State Road 37 today. The nearest interchanges to this roadway will be either State Road 46, which will increase traffic to State Road 45/46 Bypass, or south to State Road 48, which already has a capacity problem. Consideration should be given to a collector-distributor type design that would allow access to merge at or near the State Road 45 interchange. Consideration should be made to move this grade separation north, realign Vernal Pike, and construct a new roadway to 17th Street, thus providing another east-west corridor to Bloomington. (page 17 of 32)
Woodyard Road	NA	MaC	The roadway is proposed to be undisturbed at this time, therefore, traffic movement changes are not anticipated. Outside of Study Corridor, however in the Study Band. (page17 of 32)
State Road 46	I	PA	The existing interchange will remain in place. Modifications to accommodate additional traffic may be required. See frontage road system described in State Road 45 comments and collector-distributor system description in Vernal Pike comments. (page 17 of 32)
			This alignment continues north along the same alignment of State Road 37. The comments concerning the area north of the State Road 46 interchange, those of Alternate 3B, are the same with the exception of comments regarding Prow Road, which will remain undisturbed and act as a frontage road along the west side of the interstate. (page 17 of 32)

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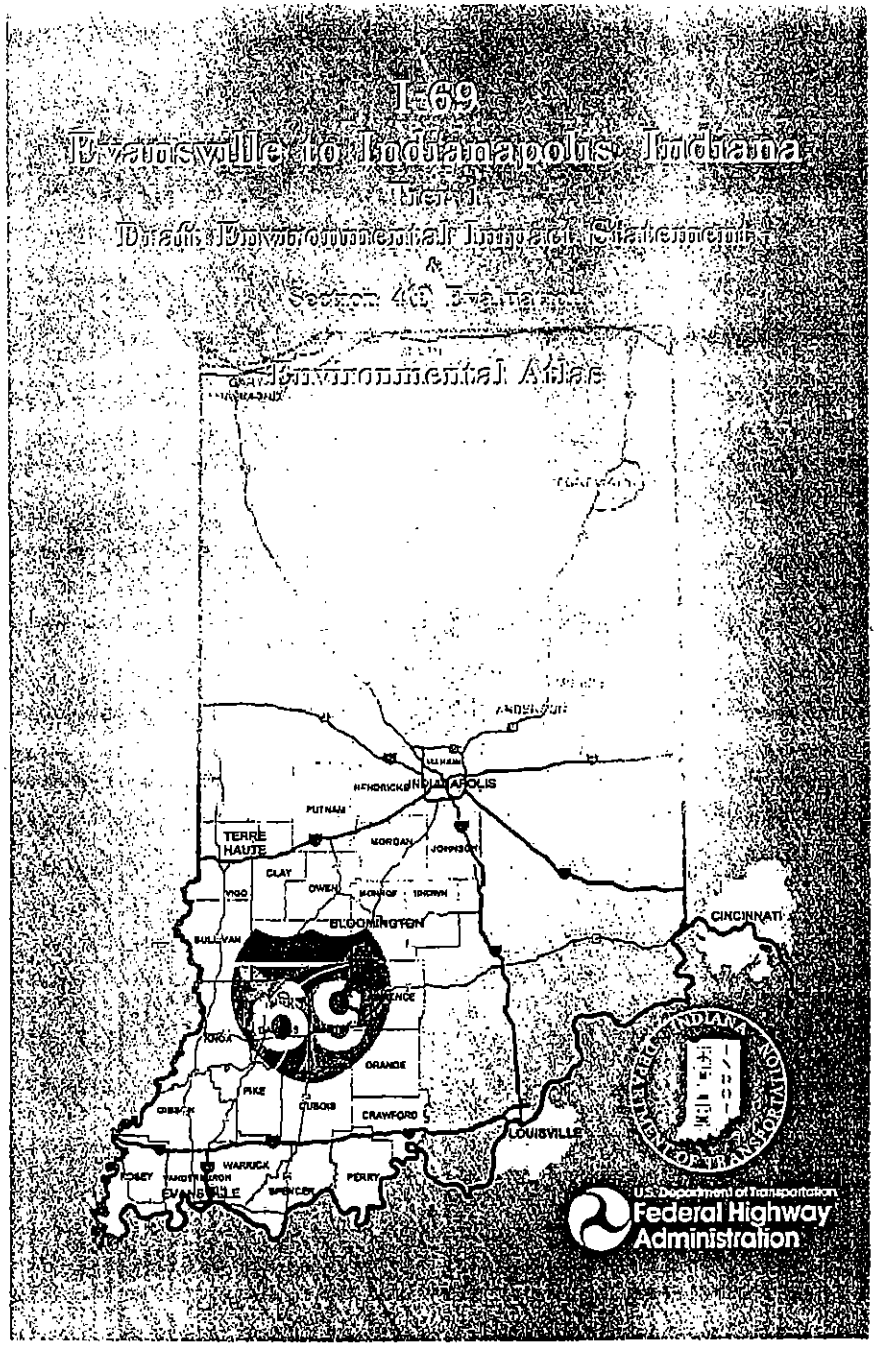
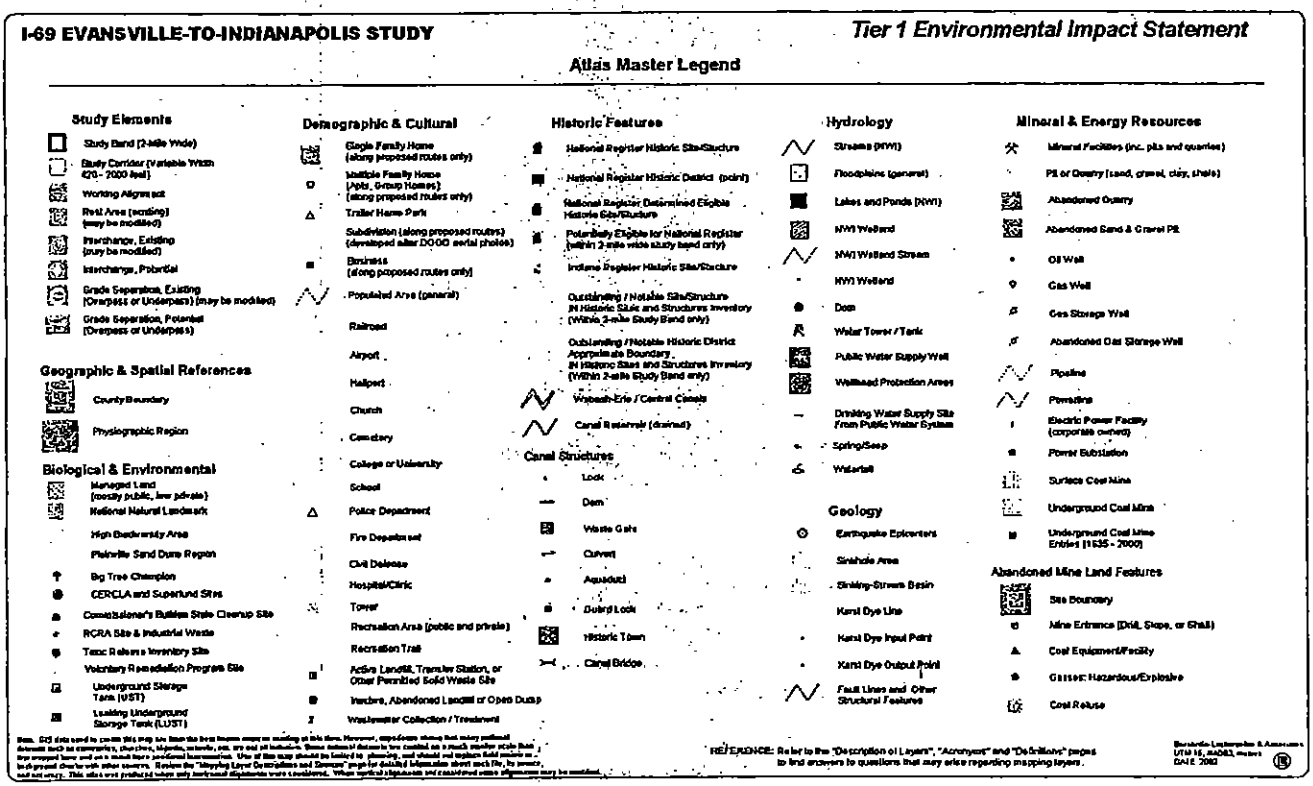
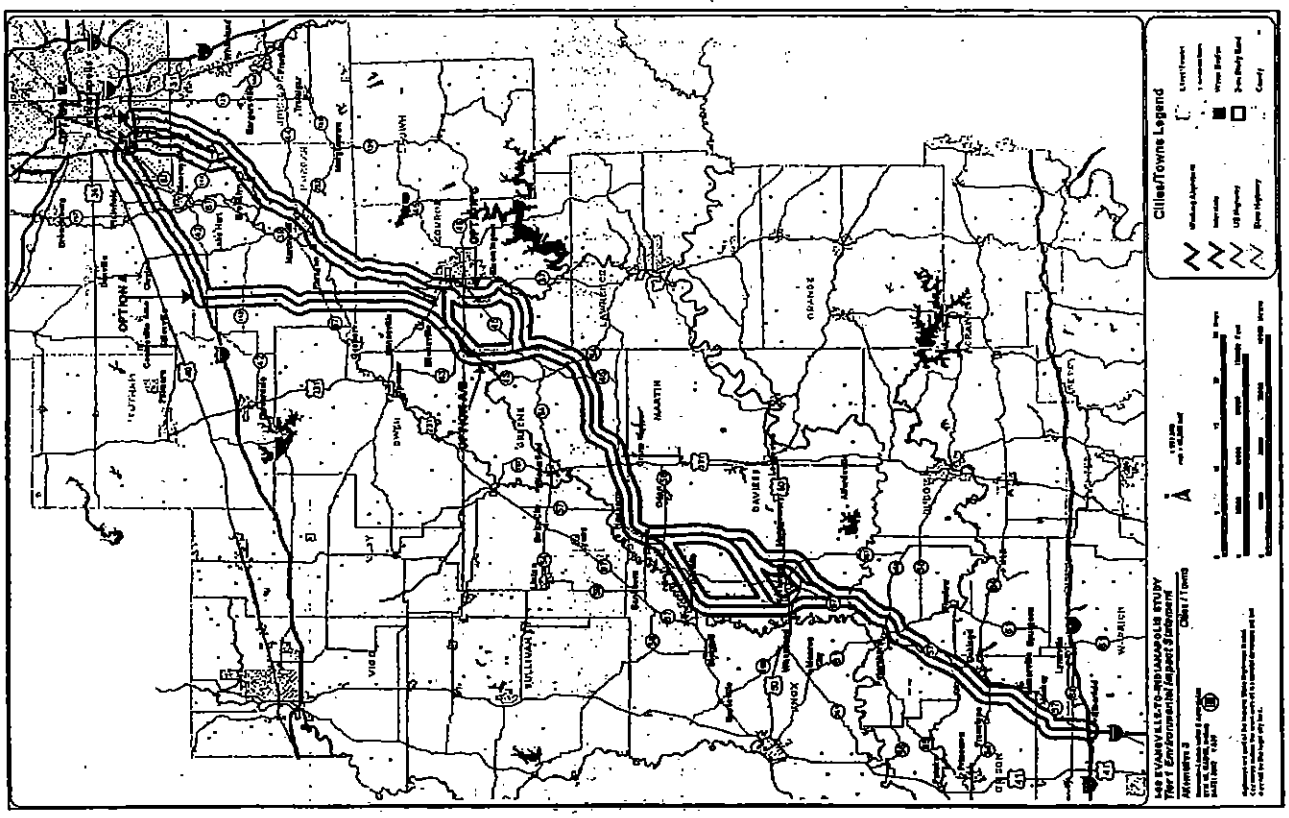
MA = MINOR ARTERIAL
MaC = MAJOR COLLECTOR
MiC = MINOR COLLECTOR

NOTES:
STUDY BAND = 2 MILES WIDE
STUDY CORRIDOR = 420' - 2000' WIDE
WORKING ALIGNMENT = < 420' WIDE




I-69 EVANSVILLE-TO-INDIANAPOLIS STUDY
Tier 1 Environmental Impact Statement
Atlas Master Legend
Study Elements
Study Band (2-Mile Wide)
Study Corridor (Variable Width 420 - 2000 feet)
Working Alignment
Rest Area (existing) (may be modified)
Interchange, Existing (may be modified)
Interchange, Potential
Grade Separation, Existing (Overpass or Underpass) (may be modified)
Grade Separation, Potential (Overpass or Underpass)
Geographic & Spatial References
County Boundary
Physiographic Region
Biological & Environmental
Managed Land (mostly public, low private)
National Natural Landmark
High Biodiversity Area
Plainville Sand Dune Region
Big Tree Champion
CERCLA and Superfund Sites
Commissioner's Bulletin State Cleanup Site
RCRA Site & Industrial Waste
Toxic Release Inventory Site
Voluntary Remediation Program Site
Underground Storage Tank (UST)
Leaking Underground Storage Tank (LUST)
Demographic & Cultural
Single Family Home (along proposed routes only)
Multiple Family Home (Apts, Group Homes) (along proposed routes only)
Trailer Home Park
Subdivision (along proposed routes) (developed after DOOD aerial photos)
Business (along proposed routes only)
Populated Area (general)
Railroad
Airport
Heliport
Church
Cemetery
College or University
School
Police Department
Fire Department
Civil Defense
Hospital/Clinic
Tower
Recreation Area (public and private)
Recreation Trail
Active Landfill, Transfer Station, or Other Permitted Solid Waste Site
Inactive, Abandoned Landfill or Open Dump
Wastewater Collection / Treatment
Historic Features
National Register Historic Site/Structure
National Register Historic District (point)
National Register Determined Eligible Historic Site/Structure
Potentially Eligible for National Register (within 2-mile wide study band only)
Indiana Register Historic Site/Structure
Outstanding / Notable Site/Structure IN Historic Sites and Structures Inventory (Within 2-mile Study Band only)
Outstanding / Notable Historic District Approximate Boundary IN Historic Sites and Structures Inventory (Within 2-mile Study Band only)
Wabash-Erie / Central Canals
Canal Reservoir (drained)
Canal Structures
Lock
Dam
Waste Gate
Culvert
Aqueduct
Guard Lock
Historic Town
Canal Bridge
Hydrology
Streams (NWI)
Floodplains (general)
Lakes and Ponds (NWI)
NWI Wetland
NWI Wetland Stream
NWI Wetland
Dam
Water Tower / Tank
Public Water Supply Well
Wellhead Protection Areas
Drinking Water Supply Site From Public Water System
Spring/Seep
Waterfall
Geology
Earthquake Epicenters
Sinkhole Area
Sinking-Stream Basin
Karst Dye Line
Karst Dye Input Point
Karst Dye Output Point
Fault Lines and Other Structural Features
Mineral & Energy Resources
Mineral Facilities (inc. pits and quarries)
Pit or Quarry (sand, gravel, clay, shale)
Abandoned Quarry
Abandoned Sand & Gravel Pit
Oil Well
Gas Well
Gas Storage Well
Abandoned Gas Storage Well
Pipeline
Powerline
Electric Power Facility (corporate owned)
Power Substation
Surface Coal Mine
Underground Coal Mine
Underground Coal Mine Entries (1635 - 2000)
Abandoned Mine Land Features
Site Boundary
Mine Entrance (Drift, Slope, or Shaft)
Coal Equipment/Facility
Gasses: Hazardous/Explosive
Coal Refuse
REFERENCE: Refer to the "Description of Layers", "Acronyms" and "Definitions" pages to find answers to questions that may arise regarding mapping layers.
DATE 2002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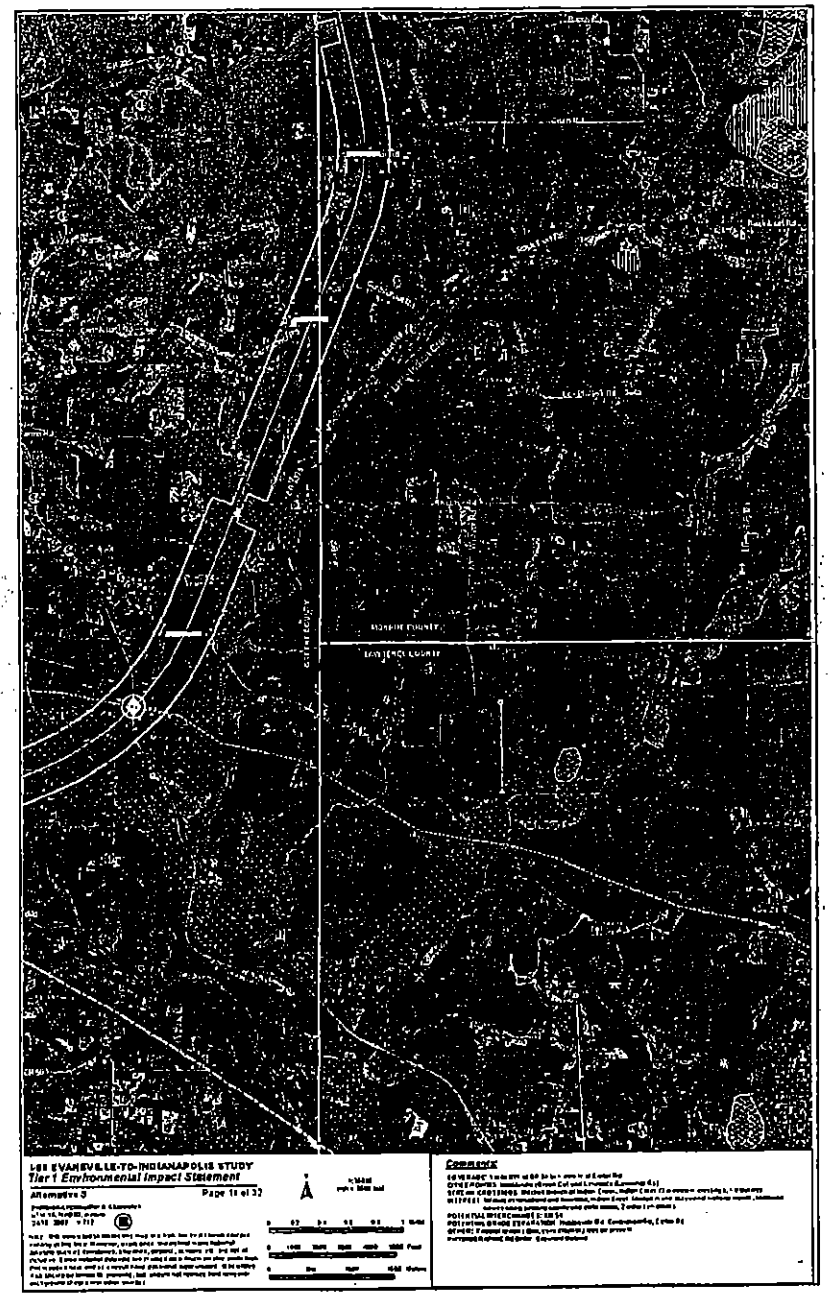
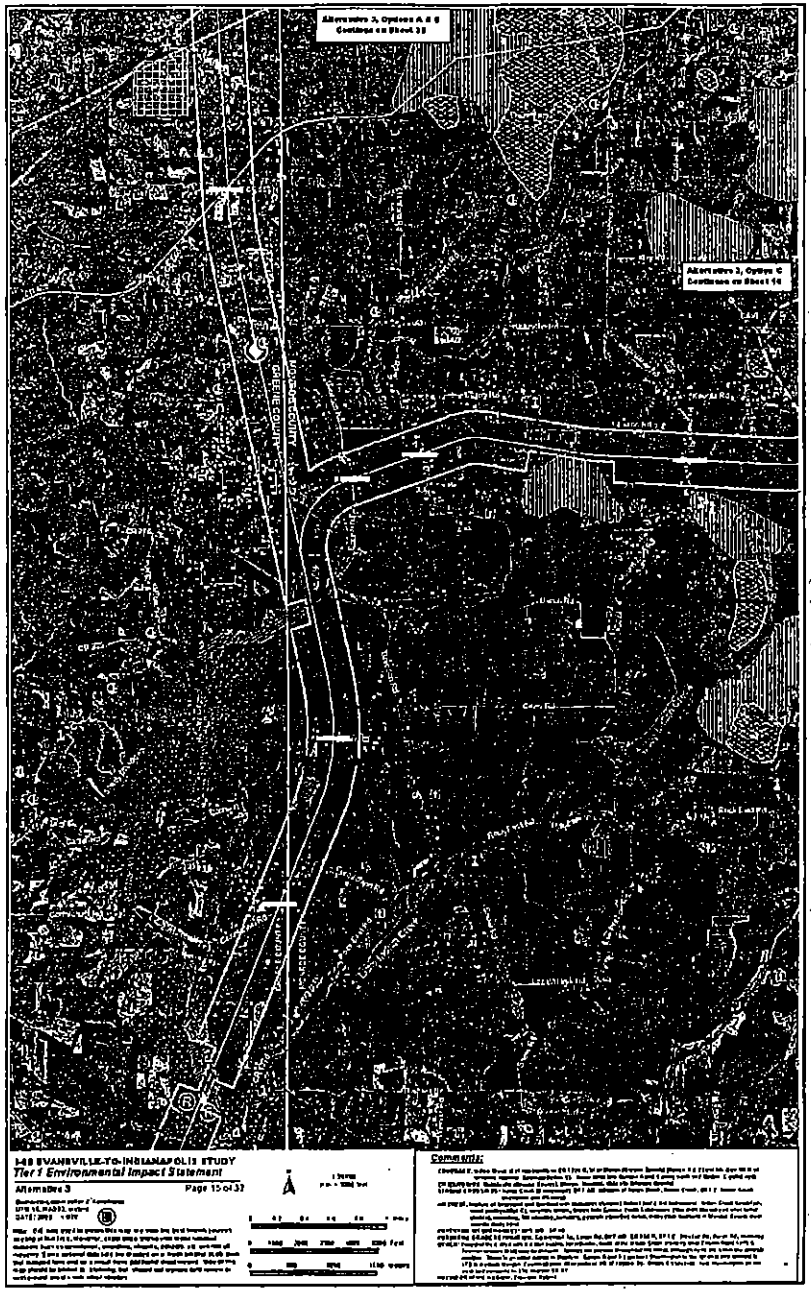
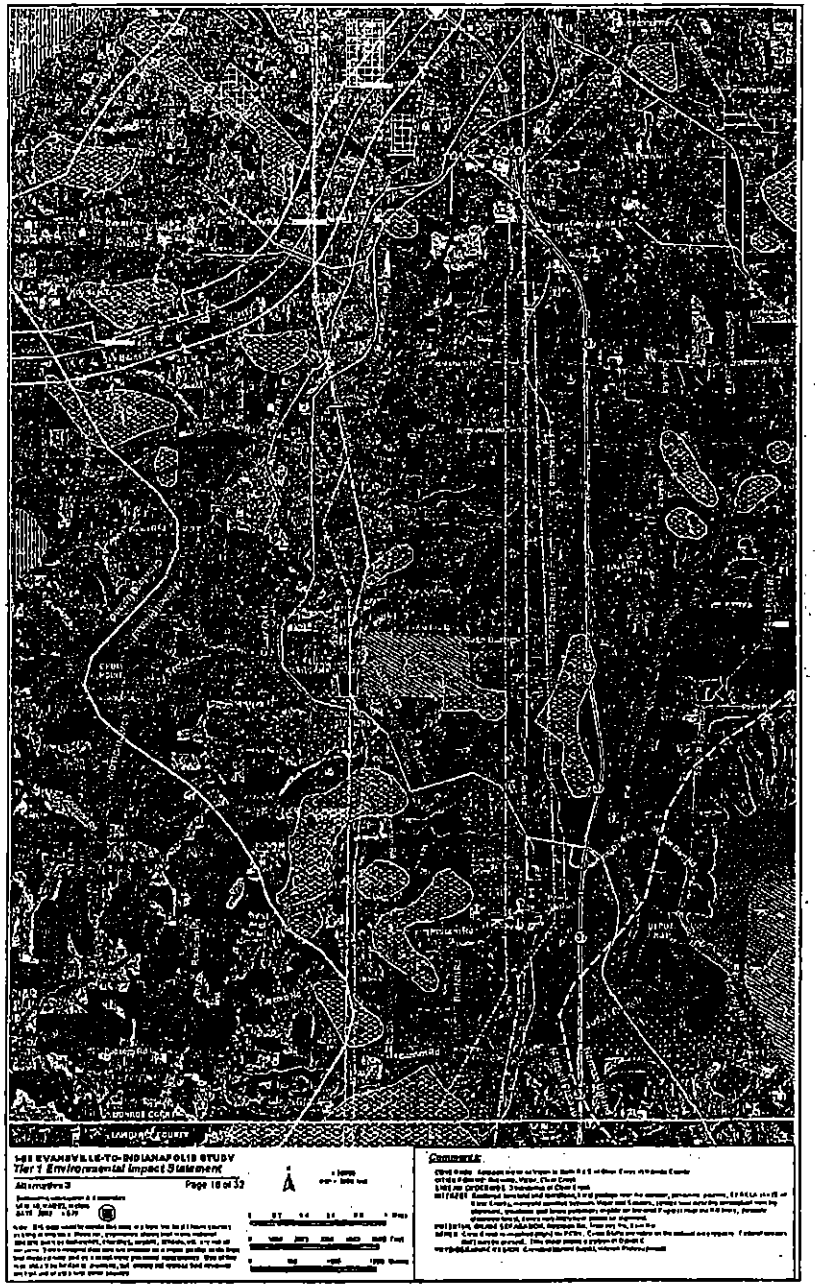
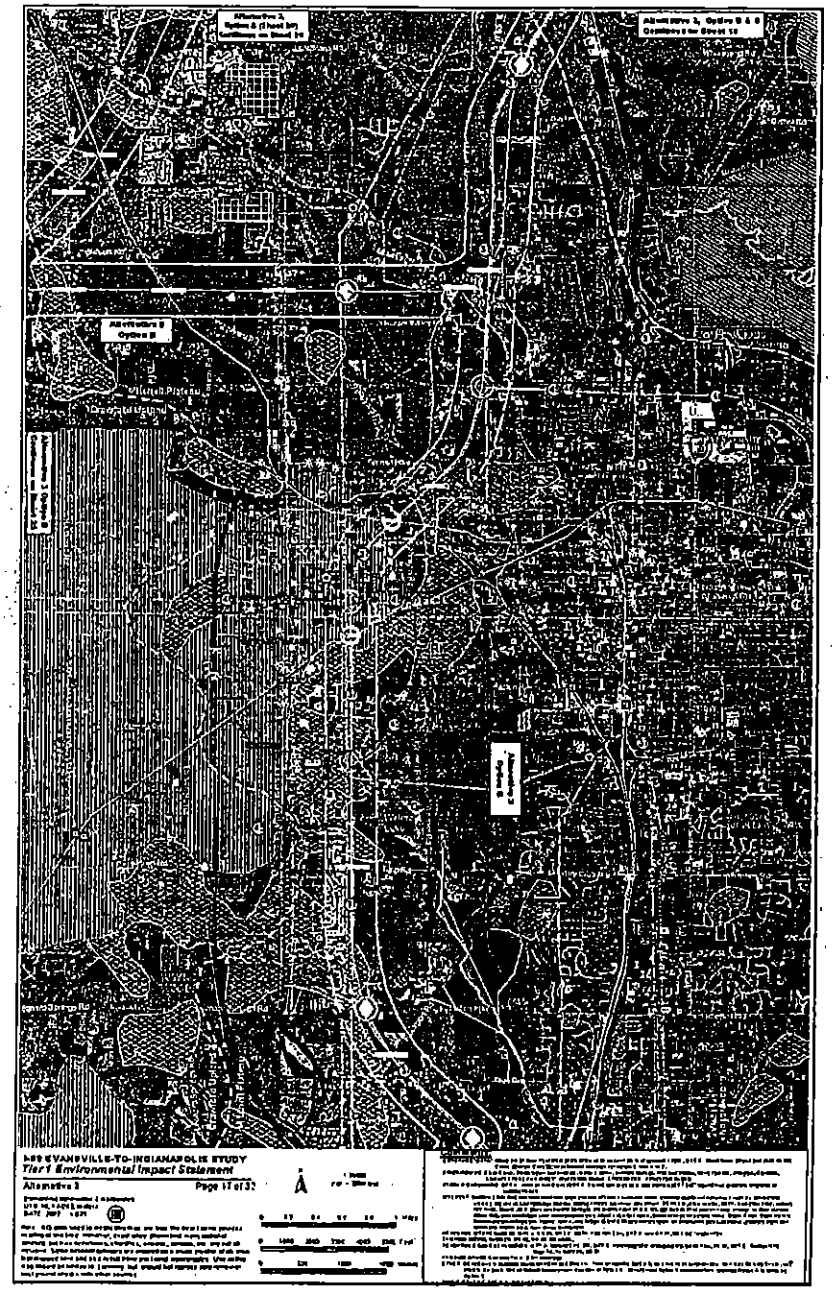
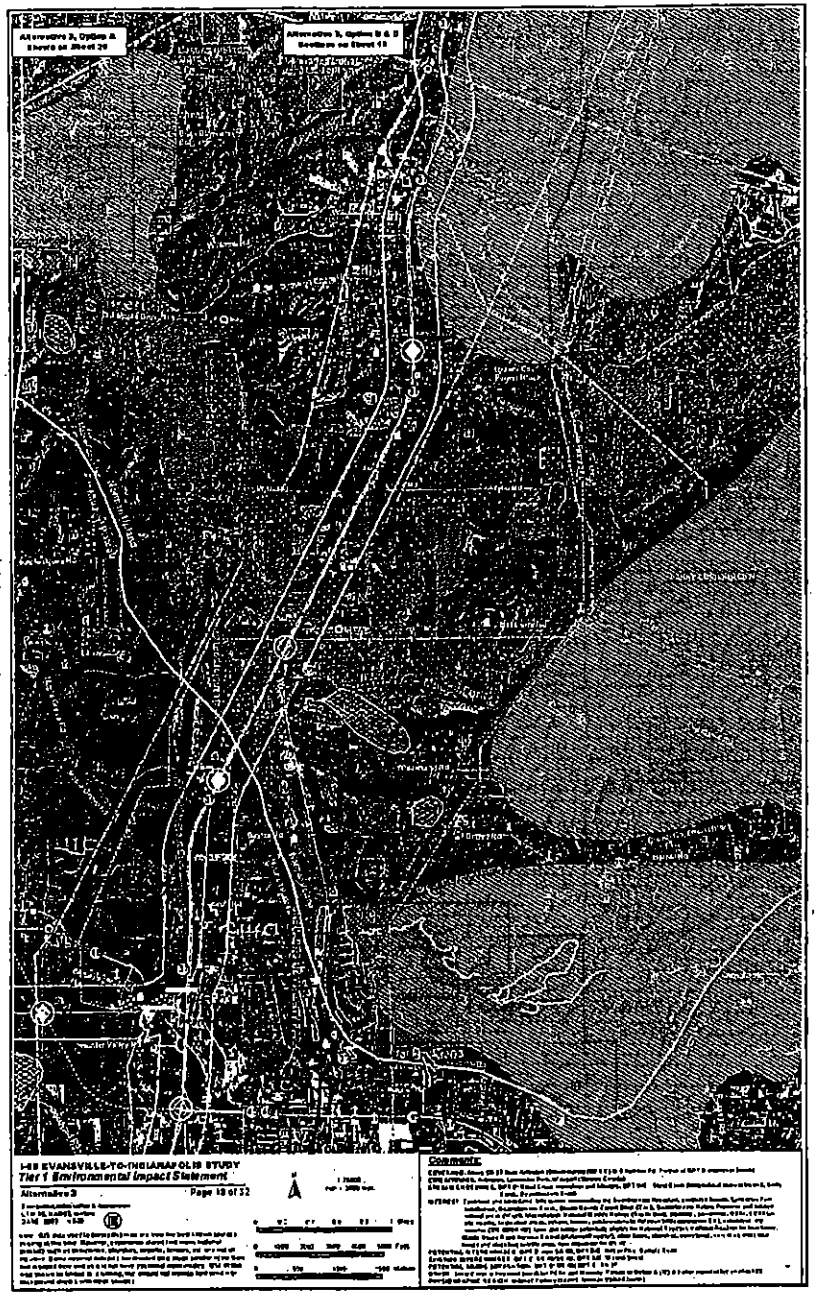
I-69 EVANSVILLE-TO-INDIANAPOLIS STUDY
Tier 1 Environmental Impact Statement
Cities / Towns

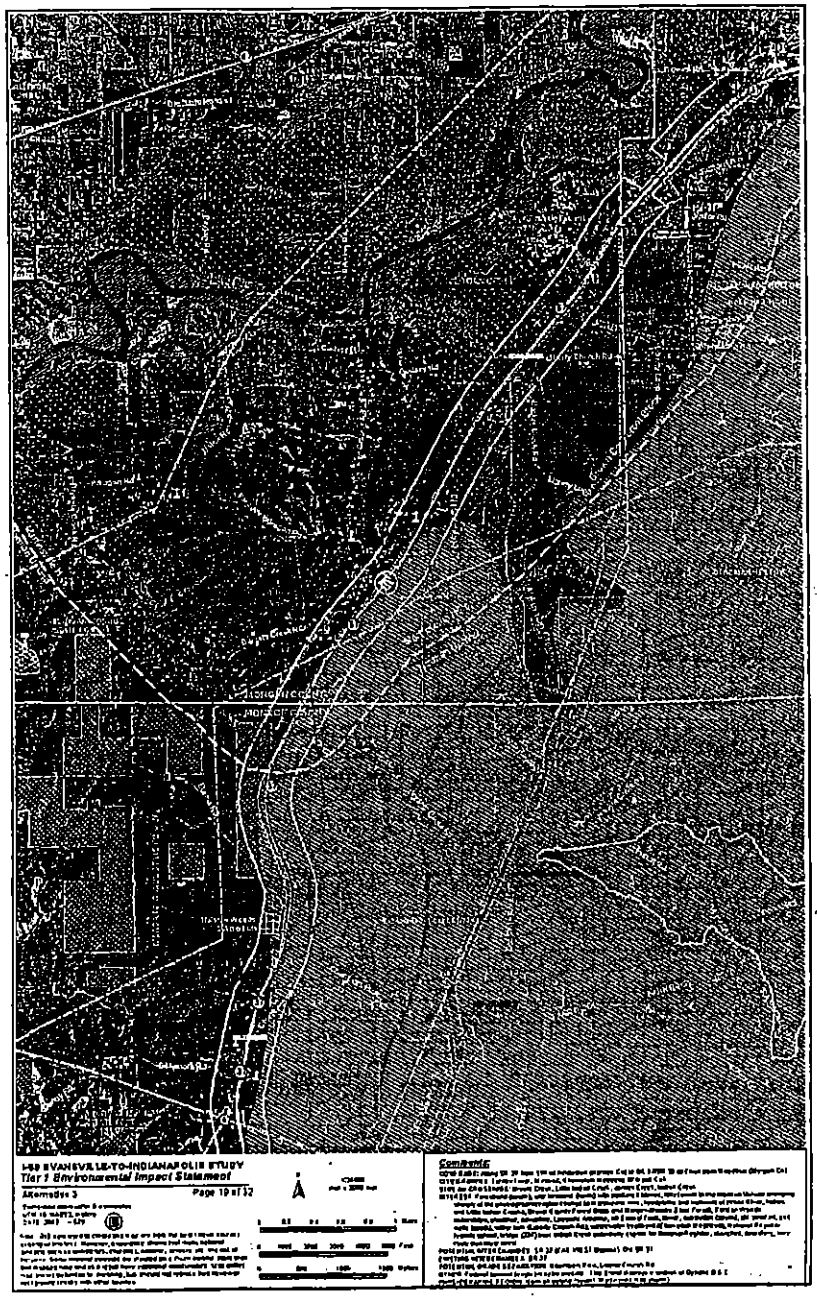

I-69 EVANSVILLE-TO-INDIANAPOLIS STUDY
Tier 1 Environmental Impact Statement
Alternative 3
Page 14 of 32
Comments:

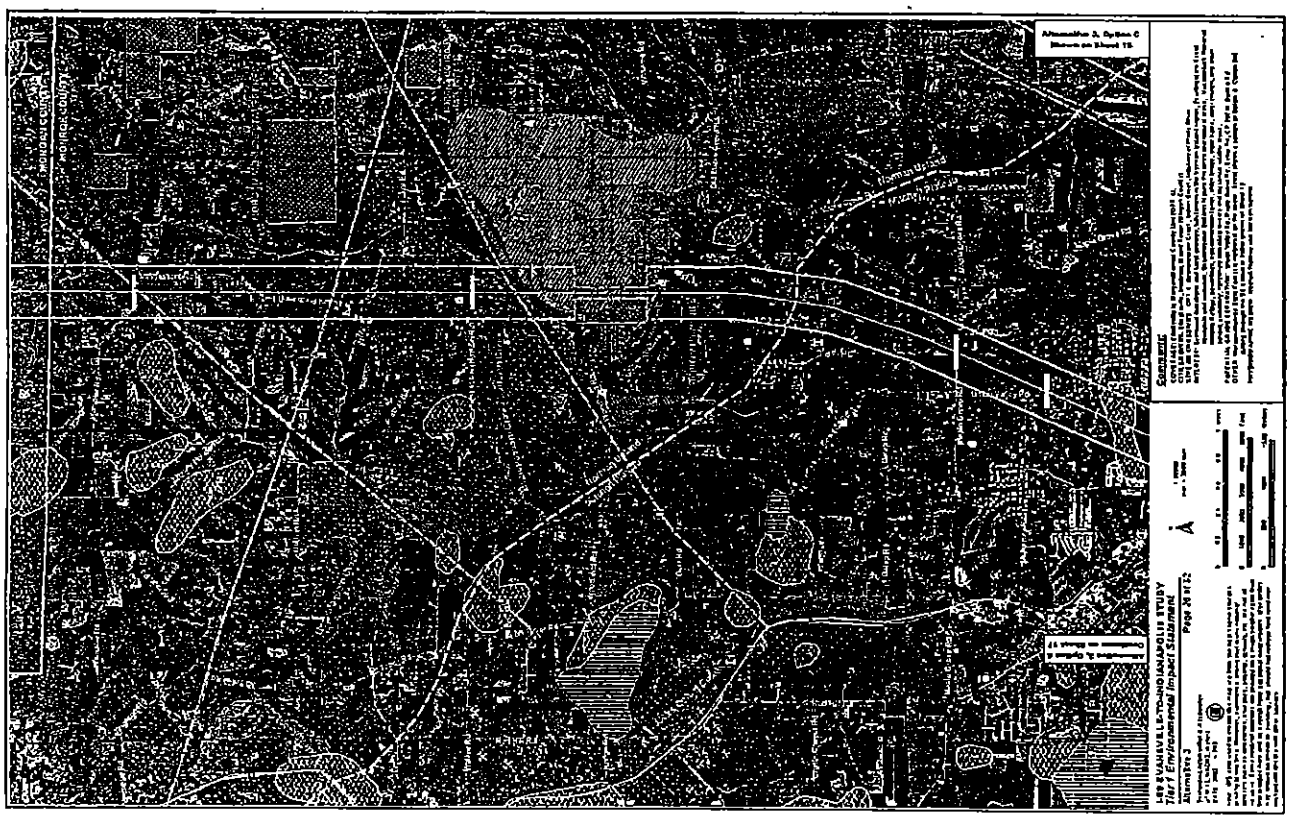

Alternative 3, Options A & B
Continues on Sheet 15
Alternative 3, Option C
Continues on Sheet 14
I-69 EVANSVILLE-TO-INDIANAPOLIS STUDY
Tier 1 Environmental Impact Statement
Alternative 3
Page 15 of 32
Comments:

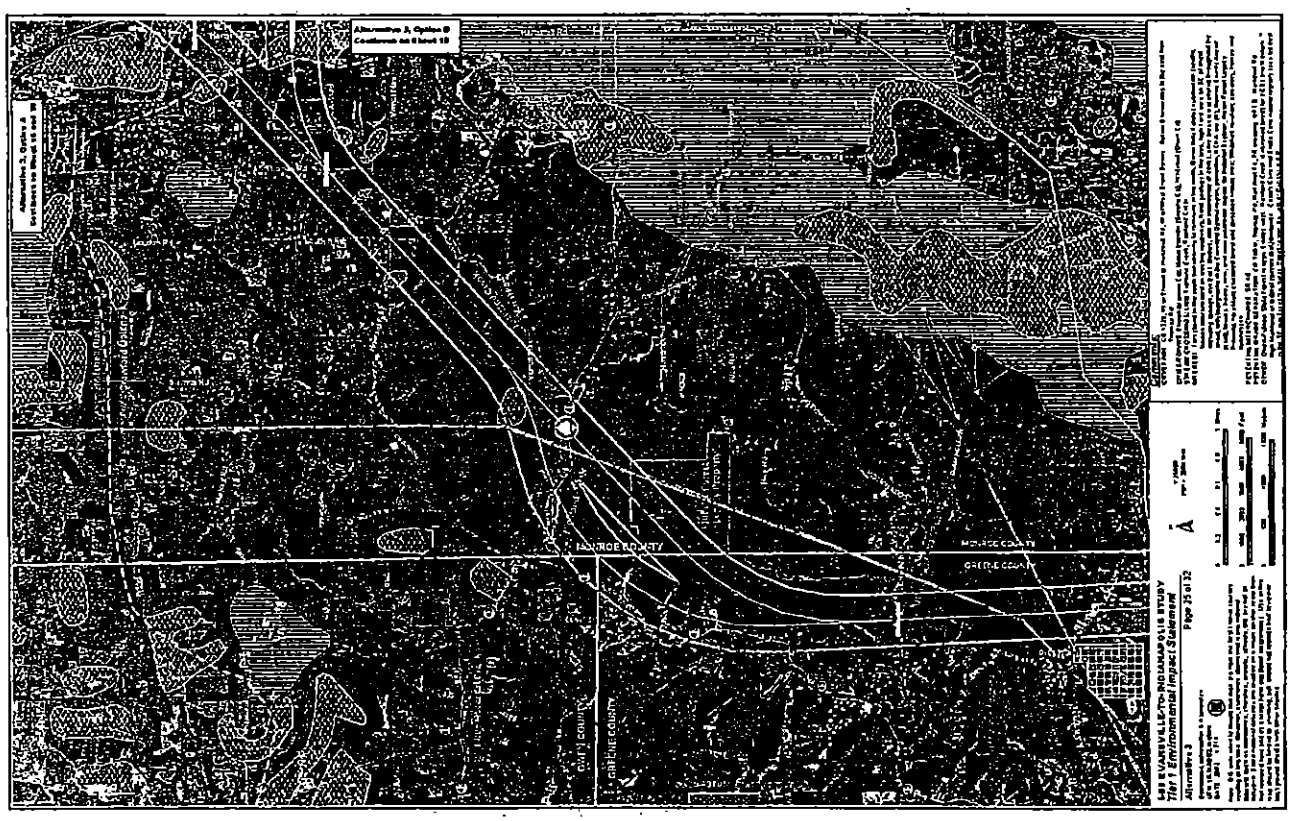

I-69 EVANSVILLE-TO-INDIANAPOLIS STUDY
Tier 1 Environmental Impact Statement
Alternative 3
Page 16 of 32
Comments:


I-69 EVANSVILLE-TO-INDIANAPOLIS STUDY
Tier 1 Environmental Impact Statement
Alternative 3
Page 17 of 32


I-69 EVANSVILLE-TO-INDIANAPOLIS STUDY
Tier 1 Environmental Impact Statement
Alternative 3
Page 18 of 32
Comments:


I-69 EVANSVILLE-TO-INDIANAPOLIS STUDY
Tier 1 Environmental Impact Statement
Alternative 3
Page 19 of 32
Comments:


Alternative 3, Option C
Shown on Sheet 15
Comments
Page 26 of 32


Alternative 3, Option B
Continues on Sheet 15
MONROE COUNTY
GREENE COUNTY
Comments
Page 25 of 32

138 Pathway Lane
West Lafayette, IN 47906-2156

September 24, 2002

Mr. Michael Grovak
Bernardin, Lochmueller & Associates, Inc.
6200 Vogel Road
Evansville, IN 47715

Dear Mr. Grovak:

Please allow me to add my voice to the many who suggest that the I70-US41 route for a reduction in travel time Indianapolis – Evansville is much the better solution than acquiring land and building a completely new road.

The right-of-way and most of the construction for this route is already completed, and even with the addition of a completely unnecessary new road, US41 may still require a costly upgrade in the future, anyway – I've been on it. It does not make sense to destroy farmland and habitat to add yet another road to the Indiana 'landscape' when such a good, economical solution already exists. Let us make use of what we have! 5.8

Thank you!

Gordon Clark
765-463-6691

0927-006

Subj: DEIS Comments
Date: 8/21/02 9:15:30 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = James D. Stanley
Address = 1832 Mt. Auburn Rd.
City = Evansville
State = IN
ZIP = 47720
Email = jdsaero@sigecom.net
Message = Favor I-69 route via Ind. Hwys 67 &57' Iv'e traveled that route regularly since 1947. and always found it to be the most direct. When I've traveled hwy 41 & I-70, there's always more congestion especially large trucks. It makers no sense to add additional traffic on the Hwy 70 route. It would be like stuffing a football into a milk carton! 5.8

I lived in Indianapolis before and after I-465 and the Interstates. Indpls. went from a downed economic situation to an improved economy with continued growth to this day. I feel certain a similar thing will occur to the grteater Evansvill area and in all the towns along the way . Much more I could say if space allowed.

0821-007 Stanley, James.wpd

Subj: DEIS comments
Date: 11/7/02 1:32:40 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Kay
LastName = Cochran
StreetAddress = PO Box 111
Address =
City = Spencer
State = IN
ZipCode = 47460
Email = ccochran@ccrtc.com
Comments = Dear Sirs:

I feel that the new I69 Route should be directed through Bloomington and not Owen County because the majority of people using the new interstate would be closer to Bloomington. Also Highway 46 is busy enough as it is now and adding people using it to get to Owen County thru Ellettsville to connect to I69 would only add more traffic on a highway already heavily used. 5.8

1107-046 Cochran, Kay.wpd

Subj: DEIS Comments
Date: 10/9/02 3:01:28 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = David Pollock
Address = 4901 E Ridgewood Dr
City = Bloomington
State = IN
ZIP = 47401
Email = dpollock@bloomington.in.us
Message = The FAQ section of your website says that traffic congestion on I-465 will be addressed in the Tier 2 study. Will you also address traffic congestion on S R 46? The Tier I study has some traffic studies, but nothing about the impact of I-69 on S R 46. 5.8

I have to suspect that for any of your preferred alternatives, S R 46 will become an important link between I-69 and I-65. S R 46 is Third Street in Bloomington. It is a congested retail and residential street, with bicycle traffic and with pedestrians using four city bus routes. You cannot seriously contemplate using Third Street as a link in the Interstate system. What will be done about bypassing Third Street? 5.8

1009-001 Pollock, David.wpd

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

Dear Michael

The DEIS to my knowledge didn't address the issue of closure of two out of three county roads. Think of the extra miles people will have to drive in order to cross the barrier that I-69 will invent. 5.8

I live in Spencer and travel to Evansville once every three years or so. Saving ten minutes is not important to me considering the path is seldom trod.

Owen county roads & bridges are poor. My interest for my money is not I-69 but fixing & maintaining local roads.

Please do not increase my tax burden for a project I don't want.

Sincerely

David C. Bailey

RECEIVED
OCT 21 2002
SLA

1021-031

Name David C Bailey

Address Rt 1 Box 556

Spencer Ind 47460

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

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The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

The new I-69 will change any area it goes threw. I have listened to so many ideas for and against this very expensive highway. No matter which route is chosen everything in that area and close by will change for every. I feel like U.S. 41 to I-70 will cause the less amount of change. Officials in charge need to think about people who are put out of their homes, divided farms and the people left behind. The people left behind will find many cross roads closed and the need to travel several miles to a access roads. Also people must face more traffic and noise. 5.8

How would I know! We live close to Highway 37 from Indianapolis to Bloomington and beyond. I know and have seen change.

Peggy Flickinger

RECEIVED
OCT 25 2002

1025-035

Name Peggy Flickinger

Address 8125 Lake Road

City/State/Zip Indpls. Ind. 46217

10/30/02

Hon. Frank O,Bannon, Governor
The State of Indiana
Statehouse
Indianapolis, IN 46204

Dear Governor O'Bannon,

I just had my first opportunity to view the potential route map for the I-69 proposed route that comes through Owen County and roughly parallels IN67 into Greene County. The purpose of this letter is to urge you not to support this route or any new terrain route, especially given INDOT's study that reveals that the I-70 US 41 route will save $600 million, 5000 acres of farmland, and over 1000 acres of forest, not to mention the human impact.

The new terrain route I mention above is, I believe, called alternative 2. Among other issues, this route slices right through the Amish community in Owen County. It would force the closing of the Freedom Valley Cabinet Shop, an employer that supports a number of families. It would force the closing of the Amish store, forcing the Amish to travel much further to Worthington for groceries. It would separate the Amish school from many of their young students who do not enjoy bus transportation or vehicular transportation by their parents who do not own cars. These children walk, bike, or drive pony carts to school. How much further should they have to travel to get the education they need?

County road 50E at the Owen/Greene county line is a major alternative route for many of us when heavy rains or snow melt flood other county roads. This is a fairly regular occurrence. This proposed route will close 50E. Is the state prepared to offer ferry service so we can get home? 5.8

I have looked at the list of local roads that would be closed or rerouted, but quite frankly, I have not had enough time to fully understand the full impact; it's a long list. Owen county has had poorly maintained county roads ever since my wife and I bought our farm. The county claims they don't have the funds to properly maintain them. The result is additional wear and tear on vehicles. The proposed routing of I-69 would make a bad situation even worse with a "Berlin Wall" forcing additional miles to be traveled. When a combine breaks and you need a part badly before the next rain starts, you don't need this kind of aggravation.

On a personal note, my wife and I bought our farm over ten years ago. When we bought it, the place was a mess. It had been over-farmed, used no conservation measures, and the creek ran brown with mud after every rain. After much consultation with USDA and the Conservation Service, we began a project that lasted about five years. Hundreds of tree plantings, thousands of yards of dirt moving, acres of native prairie grasses, conservation waterways and other practices finally did the job. After several hard rains exceeding five inches, I have proudly walked along our creek and seen perfectly clean water. Any responsible farmer must feel much the same way. To see such work destroyed by a highway whose very need is still being debated would be heart breaking.

1030-025

I'm sure you realize the magnitude of the decision making regarding I-69, and the long lasting impacts it might make. I urge you to opt for a route that minimizes new terrain, and minimizes the negative impact on people, communities, and our valuable natural resources. It seems like the I-70 US 41 route fills that set of requirements. I also urge you to expose this issue to full public awareness and debate before proceeding. It is much too important an issue to decide behind closed doors. In our community, there are many people who are just now learning what the potential impacts might be. They need to understand, and they need to be heard.

Sincerely,

Christopher M. Crawford
Rt. # 2 Box 573
Coal City, IN 47427

CC Mr. J.Brian Nicol
Mr. Michael Grovak

I-69 HOTLINE COMMENTS

11/7/02 My name is Nan Brewer and I live in Bloomington, IN and I am a registered voter and I would like to voice my negative opinion to the newer terrain highway plans through the Bloomington rural county area. I feel it would create an unnecessary noise and light pollution to our area, as well as the exorbitant cost. I am particularly concerned about alternate route 3 which would create a new exit to Fullerton Pike which would eventually connect to the road by my 1870's historic home, through a large residential area and next to a middle school. I wonder why not use the Tapp Road exit which already connects to a primarily commercial area. Or better yet, why not find another route for the highway altogether if it is necessary at all. Thank you. 5.8

1107-663 Brewer, Nan.wpd

I-69 HOTLINE COMMENTS

9/11/01 My name is Dennis Crowl, 11133 North Paddock Rd. South, Moresville, IN 46158. I went to the meeting the other night at Decatur H.S. and one thing I noticed that none of the others even talked about was this floodland and this is pertaining to the interstate near Mann Road. This area has always been flood plain and matter of fact it is listed as a 100 year flood zone. The problem with putting a road down there is that it floods every year, it floods pretty bad. They had to evacuate a school bus in Waverly just last year and they had to use rafts to get the kids off the bus and the bus was about swept off the road If you put an interstate going across a flood zone, which they have the technology, if they can build the Golden Gate Bridge, they can put a road about anywhere. The problem is when it rains, it pours. You get 2 inches out here and it's a flood, it's not like anywhere else in the US. It can rain elsewhere and it doesn't' flood as much, but this land, it just doesn't absorb water as fast and it just rolls. It goes down to every creek there is. If you put an interstate there you may or may not accommodate enough for the water flow to go into that river. The other thing is the potential of great flooding is that now you have messed up the natural flow of the land, you could end up with a disaster such as the floods of '93 in Iowa. I happened to see those rivers, I was there. I flew in an airplane going back to San Francisco going through Chicago from Iowa. I flew over the Mississippi. The Mississippi looks just like a little thread down there surrounded by the flood waters. You could see where the river was and where it was flooded out. That flood went more than a couple miles from the river. If you put an interstate there you're going to make maybe a levee or terrace, but the trouble is, the water that's flowing all the way off the hills west of Mann Road and elsewhere and on the sides of it, may or may not get across, creating potential flood hazards. You're going to mess up this area. Right now it's farmland, good farmland Another thing is you might get that road to go just like you want it to go but there's another problem. Down around river basins you have a lot of fog. There's a road out there called Smokey Row Road. It was put there many years ago by our forefathers who named that road. The road is named that way because there is fog all the time. I work swing shift and I drive along Mann Road, coming home in the evening around 12 o'clock. A lot of times it can be pretty bad down there, especially the closer to the river you go. That fog is thick. What totally surprised me is they are planning an interchange on 144 and Mann Road. And right where it hits, I kid you not, there is a lot of fog right there. If they put a road there, with cars flying by at 65-70-75, now you got fog and it's dense, you put a road in a river flood plain. Now I can see the potential for accidents and people getting killed. Whereas, if you would put the road anywhere else, such as 37, the road is much higher and above the river plain, there is less fog and potential for problems. I see flooding problems and I see accidents, people getting killed with this interstate going down by Mann Road. A lot a people have raised comments about losing their homes, some parks and all that. You're going to get that any way you go. My concern is flooding and fog. Take a look at the maps, look at how Indianapolis's Road system is. It's a star city, it's got roads going out everywhere. One little area don't have it, that's because it's flood zone. If you mess with it, you're messing with Mother Nature and God. If you're willing to cause major flooding problems down here and killing people Thank you, goodbye. 5.18 5.8

0911-044 Crowl, Dennis.wpd

Subj: DEIS Comments
Date: 11/4/02 4:26:57 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Melissa Stewart
Address = 7945 W. Spicer Lane
City = Bloomington
State = IN
ZIP = 47403
Email = stewar@indiana.edu
Message = It is my opinion that it would not be in the best interest of Bloomington to have any part of I69 come through or around it. Bloomington already has enough problem with traffic on State Road 37 without adding to that. In addition, we already have an increased amount of "big city" factors that we didn't a few years ago. Drugs, murders, bank robberies, etc. There is already enough congestion in the Bloomington area. 5.8

In addition, it is also my opinion that neither route 3B nor 3C should be used. First of all, it behooves me to see pristine farm land swallowed up by a new highway and people wanting a quicker trip Indy to Evansville. It's no wonder people are having health problems. You take stressful jobs and add to that stressful road conditions to travel between work and home. Let's slow down and smell the roses. Or in this case, the wide open spaces and let's leave behind the smell of asphalt, gasoline, and all the other things associated with an interstate highway.

1104-019 Stewart, Melissa.wpd

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

November 6, 2002

Mr. Mike Grovak
Bernardin-Lochmueller & Associates, Inc.
6200 Vogel Road
Evansville, IN 47715-4006

Dear Mr. Grovak :

Re: IDEM's Comments on the I-69 Tier 1 Environmental Impact Statement

I am writing to comment on the Tier I Draft Environmental Impact Statement (EIS) for the proposal to extend U.S. Interstate highway 69 (I-69) from Indianapolis to Evansville, Indiana. As you know, the Indiana Department of Environmental Management (IDEM) has been working with Bernardin-Lochmueller & Associates, the Federal Highway Administration (FHWA) and the Indiana Department of Transportation (INDOT) to review the environmental impacts of this project under the Early Environmental Coordination Agreement established pursuant to Section 1309(d) of the Transportation Equity Act Amendments of 1997.

IDEM has the following comments:

Re: Wetlands and Water Quality

Overview -

All proposed alignments have the potential to directly and indirectly affect water quality, wetlands, and various other surface waters. Any proposals carried forward into Tier II should, to the extent practicable, minimize impacts to sensitive water resources such as wetlands and karst features. 5.24

Wetlands -

The draft EIS indicates that wetland mitigation – the restoration of wetlands to compensate for wetlands impacted by the project – would occur as a part of this project. IDEM will continue to evaluate this project as it evolves and will recommend appropriate mitigation once a final alignment has been chosen. The estimates of wetland impacts may change dramatically once an alignment is chosen, as INDOT will need to field verify the presence, size, and precise location of wetlands within the actual areas to be impacted by the proposed project. 5.19

1106-148

Therefore, the numbers listed for each alternative are only estimates and are not adequate for calculating actual mitigation ratios or the number of acres required for mitigation. Based on the Draft EIS, one or more of the alignments could impact highly sensitive wetlands, such as the Flat Creek Wetland Complex or the Prides Creek Wetland Complex. Obviously, these areas must be avoided, as the presence of endangered species and unique aquatic ecosystems make mitigation virtually impossible. Specific roadway alignments could be modified to skirt these areas if the alignment in question is carried forward to Tier II. 5.19

Karst Features -

Some proposed alignment would pass through areas underlain by karst, or directly impact significant karst features, such as mapped caves. Surface and sub-surface karst features must be avoided by any alignment carried forward to Tier II, as roadway construction and long-term operation could have detrimental impacts to water quality within these areas. Features such as sinkholes, which are in essence direct conduits to groundwater, can pipe pollutants directly into underground rivers and other sub-surface water resources. In addition, in areas such as Blue Springs Cavern, the presence of federally listed endangered species adds an additional layer of concern. 5.24 5.17

Some karst features can be addressed with pollution control measures, such as those contemplated in the 1993 Interagency Memorandum of Understanding regarding Karst and Transportation Projects. Other impacts to karst, such as stormwater from roadways, may need to be mitigated within the proposed alignment. Page 7-2 details that INDOT will work with local units of government to encourage planning for development. This is useful, but some sections of roadway may require mitigation concurrent with construction, as detailed on page 7-7. 5.23

As project plans evolve, IDEM recommends dye tracing and other tests to gain further understanding of karst features within any alignment carried forward to Tier II that impacts karst terrain, before specific roadway alignments are designed. Assessment of the interface of roadway features, non-point source pollutant transport, and karst features will be critical to the construction and long-term maintenance of any future alignment of I-69 that may be located within sections of the study area where karst is present. 5.24

Streams, Rivers, and Other Waters -

All proposed alignments, including the I-70/U.S. 41 option, will entail the construction of bridges, culverts, and other structures designed to span or pipe waters through the right-of-way for a given alignment. At this stage, it is virtually impossible to begin to characterize these impacts, as decisions regarding the type of structure and the footprint of impact will not be made until the final design phase of the roadway.

In general, IDEM recommends that the realignment of any surface water be avoided wherever possible, as stream channel realignments can have significant effects on short-term and long-term aquatic habitat and in-stream water quality. We recommend that, in Tier II, INDOT studies further the waters within the proposed alignment and identifies or rank-orders waters based on criteria such as ambient water quality, extent of anthropogenic impacts to the stream channel and the riparian corridor, and other activities within the watershed that may have an impact on water quality and aquatic life within the affected water body. It would be helpful if INDOT would provide information, in a general manner, regarding which types of water bodies would typically be culverted versus bridged, and how INDOT intends to mitigate for these impacts. IDEM will, as a part of required authorizations for the final project, require compensatory mitigation for impacts to streams, rivers, and other surface waters. 5.22

Stormwater Regulatory Issues

The I-69 project also will be subject to regulation under the NPDES (National Pollutant Discharge Elimination System) Stormwater program. The construction phase of the project must comply with the terms and conditions in 327 IAC 15-5 (Rule 5) to ensure that sediment and other pollutants are not discharged into waters of the state. Furthermore, based on the route utilized, this project could be subject to an individual NPDES Stormwater construction permit.

In addition, the project will have to comply with Phase II Municipal Separate Storm Sewer System (MS4) regulations. INDOT will be issued an individual NPDES MS4 permit that will contain requirements for post-construction storm water management. To meet these requirements, INDOT will need to develop and implement strategies that include a combination of structural and/or nonstructural best management practices. Two of the most substantial impacts of post-construction runoff are caused by: 1) an increase in the type and quantity of pollutants in storm water runoff and 2) an increase in the quantity of water delivered to the adjacent water bodies during storms. Given that some of the best management practices available to reduce these impacts require a large land area for their installation, decisions to commit to such practices will need to be made during the planning phase, and prior to the initiation of construction activities. 5.24

Air: Conformity With the State Implementation Plan

With respect to air quality issues and conformity with the State Implementation Plan, IDEM currently has no specific formal comments. Even using a worst case scenario, the Tier I EIS does not suggest the project will pose a conformity risk. However, because the Tier II EIS for the project may more specifically define the impacts the highway may have on air conformity issues (especially at the two urban "termini") the agency may comment on conformity issues at that time. 5.9

Re: Land Quality and Contamination Issues

Based on our review of Tier 1 of the Draft EIS, the proposed I-69 Evansville to Indianapolis corridor has the potential to impact up to 16 RCRA (Resource Conservation and Recovery Act) hazardous waste related sites, 5 UST (Underground Storage Tank) facilities, and 2 LUST (Leaking Underground Storage Tank) sites. None of the preferred alternatives described in the Draft EIS had any apparent direct impact on landfill locations, Voluntary Remediation Program sites, Commissioner's Bulletin sites, or Superfund (Comprehensive Environmental Response, Compensation and Liability Act) sites, although some are within one mile of the anticipated routes. Of the RCRA sites listed, 15 of the 16 were small quantity generators. According to the Draft EIS Mitigation Section, INDOT will coordinate with IDEM to insure proper cleanup of the contaminated sites. 5.16

The Remediation Branch of IDEM is aware of all the facilities and sites referenced by INDOT in their Draft EIS, but would also like to point out that additional unknown contaminated properties might be present along any of the potential routes. Once the final route is chosen, the IDEM Office of Land Quality (OLQ) will work with INDOT to further identify cleanup needs at the potentially impacted facilities and will look for other potential contamination locations. None of the known sites listed along any of the preferred routes are anticipated to cause major problems if site remediation is required. In addition, OLQ will help INDOT assess conditions for sites within the one mile corridor of the chosen route. 5.16

Clearly, IDEM anticipates continuing interaction with INDOT with respect to this proposed I-69 extension project.

Sincerely,

Lori F. Kaplan
Commissioner

LK: dp

cc: Vaneeta Kumar, INDOT
Lyle Sadler, INDOT
Roger Manning, INDOT
Robert Dirks, Federal Highway Administration

Bcc: Tim Method
Dave Parry
Paula Smith
Andrew Pelloso
Dennis Clark
Mary Ellen Gray
Anne Black
Craig Schroer
Bruce Palin
Mary Beth Tuohy
Scott Deloney
Janet McCabe
Lori Gates
Bruno Pigott

Subj: DEIS Comments
Date: 8/19/02 11:18:29 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Paul Hughes
Address = 6577 Old Stonehouse Dr
City = Newburgh
State = IN
ZIP = 47630
Email = hughespa@aol.com
Message = I agree strongly with your selection process and the five preferred routes. Continue the good work and let's make some progress. This document is an "environmental" statement. Shouldn't it include more comments regarding air quality impacts, extending even to the "no-build" alternative? I would assum that the shortest, most direct route would result in the least vehicular pollution and most economic savings in gas and diesel fuel used (and the environmental impact of producing that fuel). If that savings is 15 minutes or 30 minutes, it is still multiplied by the number of vehicles per day, for the expected life of the highway, that vehicles will NOT be adding pollution to the environment. How can this not be a significant impact when we already have "ozone alert" days (with associated recommendations to limit driving) every summer? Here is an opportunity to reduce vehicular pollution by selecting a more direct route. How much would it cost to achive that same reduction in pollution by other means if a less direct route is selected? I only noted one paragraph in the summary that addressed air quality, and I believe there is an opportuntity for significant improvement by selecting a more direct route. This should carry some weight in the selection process. Thank you for your consideration. 5.9

0819-004 Hughes, Paul.wpd

The I-69 fiasco and reason number 8 why it should not be built:

Since INDOT seems hell-bent on building a new terrain highway no matter what the economic, resource, and human cost might be, I have undertaken a letter writing campaign to inform INDOT of their inherent ignorance of numerous points. I am writing this series of letters as a matter of formal public comment, and I fully expect INDOT to include this in their EIS and actually read and consider the points being made.

An eighth reason why a new terrain I-69 cannot be built is the myth that is being widely perpetuated that an improvement in air quality will result with a new interstate. This is based on the idea that high-speed roads with no stoplights will result in less stop-and-go traffic, less idling vehicles, less acceleration and deceleration, and consequently less air pollution. A great idea if the number of vehicles stays the same, but it will NOT.

An obvious increase in the number of vehicles traveling a new four-lane road will lead to an overall increase in air pollution and an overall decrease in air quality for southwestern Indiana. You will be doing no one any favors in this arena by building a new road. The increase in the sheer number of vehicles will more than offset any reduction in pollution due to stop-and-go traffic.

If INDOT were truly concerned about improving air quality -- which they obviously are not -- they would give more weight to the no build alternative. This alternative would require vehicular traffic to use the existing road system which would produce increasing amounts of air pollution into the future due to stopping and idling traffic, but would not draw in vast new quantities of additional traffic. The overall result would be LESS air pollution than if a new interstate was built. 5.9

I am sick and tired of INDOT, BLM, and all their cronies pushing this idea that the air quality will improve with a new highway. IT WILL NOT! This is just another of the many, many examples of INDOT stacking the deck towards their predisposed bias and predetermined conclusion of building a new terrain road. This myth, along with all the others, will not fly, and there are not enough idiots out there to believe this lie.

If air quality is a concern, DO NOT BUILD A NEW TERRAIN HIGHWAY!

Wayne Werne
RR 1 Box 254
Ferdinand, IN 47532

Wayne Werne

0824-025

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November 5, 2002
(317)780-1011

Mr. Michael Grovak, Project Manager
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, Indiana 47715
Fax: (812)-479-6262

Dear Mr. Grovak:

An old saying is that there are only four reasons for doing anything: wealth, wisedom, love & beauty, and health. I am against a new terrain version of I-69 for all of these.

Wealth of the citizens at large will not be enhanced building an all new interstate with the cost of more than a half billion dollars along with associated maintenance costs that in thirty years could double the cost. Put the money to high tech business growth and development and education for citizens of Indiana

Beauty and love: at all three of the meetings that I have attended that the vast overwhelming number of citizens who spoke did not wish to have anything to do with a new terrain I-69 that would improse the sprawl of Indianapolis on their life style and the thought of a mere fifteen minute benefit to sacrifice the natural beauties offered by the southwest only made them more emotional.

Wisedom: the old saying of Kenny Roger's of know when to hold and to fold any project development is wise and prudent. This project will not benefit Indiana at large and be a major weight to all the citizens when compared to the costs.

The health consideration for being against any new terrain interstate is that the ozone factor influencing asthma in the youth is more serious than ever was previously believed according to the July 1, 2002 U.S. & World News. The American Lung Association of Indiana states it is the top chronic childhood disease and has double in the last ten years. In one study in the U.S. & World News article states that a one sixth increase in ozone increases school absences sixty three percent. 5.9

The southwest part of Indiana with less track home and strip mall develop offering more green, trees, and agriculture than other parts of the states provides the means to reduce the ozone not only for that part of the state, but also effecting the capital city of Indianapolis which is under review by the EPA for consideration for being declared a high ozone area which would also effect the whole central Indiana area. This would definitely dampen the central Indiana commercial growth. There has never been a reversal of this declaration type once they have been declared.

You have the rational for significant reasons for not proceeding with any new terrain interstate. Could you advise me of any planning to mitigate the environmental damage of thousands of trees and acres of farmland to be taken out of existence which now provide the citizens of Indiana of clean air. Are the communities that the interstate that would be going through going to be developing alternative travel forms to the car? Are there going to be community plans where this proposed new terrain interstate planned to prevent environmentally unfriendly track home development and strip malls? I would appreciate your reply to these questions. We do not need the American environmental version of the French attempt to build Panama Canal where the plans didn't meet reality in Indiana.

Sincerely Yours,

William Ihrer

William Ihrer

PUBLIC HEARING COMMENTS

Lucille Bertuccio... Thank you. We are a little rowdy bunch but we have our hearts in the right place. I suspect that INDOT doesn't know have no in it's vocabulary, no is a word it does not understands. And I think that, what is it about no, it seems like it's a very simple word and it just doesn't seem to get across to them. What will we get if we get the new terrain highway as pushed down our throat? We will have more air pollution, studies have shown that children living near highways have more chance of asthma. There are 50 million children with asthma now in the country and it will increase with every new highway we build. Global warming how about some global warming for your local environment? We have already got quite a bit of it we'll get a little bit more with every new highway that they build. We will have strip malls, do we all want a few of those strip malls and fast food restaurants a little bit of hotels and motels some of those places where we can get our five dollars and a quarter per hour. We are not going to have a dime downtown though. Because that's what happened in every city where they have a new terrain highway, look at Allentown Pennsylvania. Try and look at some of these cities over the internet if you have one, look and see what happens to them, they have a dying downtown they have strip malls and sprawl and that's what we'll intend to get too if we get I-95. What will happen if we get I-69 I'm sorry, what will happen if we, what will they give us if we get it. What will we have, we wont have, less farms and forests, I-69 eats our environment. The Amish don't drive, so will the Amish get a reprieve from this I-69, I don't think so that's not particularly democratic. We won't have a beautiful environment, just ranches and interchanges, this highway affect will affect every single one of us in the city. When you look out your window you'll see an interchange so that everything we do right now we need no new terrain on our roads. 5.9

0820-096 Bertuccio, Lucille.wpd

Subj: DEIS Comments
Date: 11/4/02 4:04:35 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Carol Bruce
Address = 1108 S Nancy Street
City = Bloomington
State = IN
ZIP = 47401
Email = carolbruce@lycos.com
Message = I am writing to express dismay with your poorly-conceived and poorly-executed "environmental impact statement." By limiting yourself to a narrow corridor around the highway, you are able to ignore most of the negative effects of I-69 on Southern Indiana. You ignore noise pollution and runoff into our waterways. Most of all, you ignore us when we say this highway is a waste of taxpayer money. 5.10

I do not have the words to express my disgust with this dictatorial action by the Indiana state government.

1104-018 Bruce, Carol.wpd

9-25-02

I-69 Evansville to Indianapolis

I frequently drive on I-70 between Terre Haute and Indianapolis and have done so for 25 years. Traffic on this stretch must surely be at capacity! I've noticed that literally half the traffic going west gets off at Terre Haute.

I bet your travel time studies don't include the 20 minute to 1½ hour back-ups caused by never ending road construction. And let's not forget the complete shut down of I-70 from accidents, which seems to be occuring almost monthly now. 5.12

You have got to pick a route that reduces the amount of traffic (and wear) on I-70!

I think building I-69 where there are no existing roads will impact the least number of people. Also, the people of Greene County could sure use a "real road".

Ralph Peeler

Ralph Peeler
P.O. Box 95
Fairbanks, IN 47849

0925-009

Subj: DEIS Comments
Date: 8/13/02 5:54:54 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = RIchard Lamb
Address = 6616 E Cherry St.
City = Evansville
State = IN
ZIP = 47715
Email = richardlamb@reddinger.com
Message = I-69 should be built as direct between Inianapolis and Evansville as possible.

Upgrading 41 to a limited-access highway would be: more expensive because of purchasing additional property for right of ways for access and property replacement; take longer to complete due to relocating commercial and private accesses as well as families and businesses; expose travelers to a multitude of hazardous situations involving construction equipment and conjested traffic; not to mention the inevitable result of physically separating people who have well established family life and the finacial impact on businesses due to disruption and separation from customers who will have to travel longer distances to purchase goods or services. 5.12

The people who argue that driving a straight route to Indianapolis from Evansville (at 70 mph with no stops) will only save "13" minutes over the route through Terre Haute can not convince me or other realistically minded people that this is true. I've driven to Indianapolis too many times!!

Terre Haute already has I-70 and the boom of commercialism it brought to that area. Let Indiana grow by providing an avenue for industrial and commercial development to part of the state that hasn't had the opportunity.

We don't need to add additional traffic flow or the congestion of new construction to an already overburdened corridor.

0813-003 Lamb, Richard.wpd

Evansville Regional Business Committee, Inc.
P. O. Box 778, Mail Drop KTO121
20 NW Third Street, 12th Floor
Evansville, IN 47705-0778
Voice 812-456-3434
Fax 812-456-3496
Email david.knapp@53.com

October 9, 2002

Randall K. Alsman
Mead Johnson Nutritionals

Alan W. Braun
Industrial Contractors, Inc.

James L. Brown
Casino Aztar

Steven E. Chancellor
Black Beauty Coal Co.

John N. Daniel, Jr.
Fifth Third Bank

Niel C. Ellerbrook
Vectren Corporation

Frederick W. Geissinger
American General Finance Co.

Edmund L. Hafer, Jr., AIA
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Indiana Department of Transportation
100 North Senate Avenue
Indiana Government Center North, Room N755
Indianapolis, IN 46204

Dear Mr. Nicol:

The construction of I-69 along a direct route from Indianapolis through Southwestern Indiana and Evansville is vitally important to future economic growth in Southwestern Indiana and to the prosperity of its people and their future generations. A new four-lane divided highway will offer a safer, faster link to the rest of Indiana, improving access to important healthcare, education, and business and employment opportunities in other parts of our state and the nation. Until a north-south connection to the interstate road system is provided to this part of the state, the economic potential of Southwestern Indiana will continue to be severely restricted and its citizens will continue to either devote unnecessary time traveling over older and less safe roads in making needed trips, or not make them at all. Ending Southwestern Indiana's isolation from our nation's interstate road system is both an economic and a quality of life issue for all of its people.

There has been much debate over which route is the most or the least expensive in terms of construction costs. This is an important issue, but the cost compared with the benefits to be realized must ultimately be the focus for decision making. And, as you know, there is no trade-off between whether money could be better spent on education or other uses. The funds that will be used for I-69 can only be used for roads, so the question is, then, which road expenditure can provide the optimal long-term benefit result for the most people in Indiana. The projections clearly point to the shortest possible route between Indianapolis and Evansville. Additionally, in evaluating the less direct route, which requires a major overhaul of the already heavily traveled U.S. 41 to Terre Haute, the risk to life and property over the construction period has to be weighed versus the new terrain route that substantially eliminates this interim danger and disruption. 5.12

There are clearly two immediate priorities for the people of Southwestern Indiana: one, the selection of the most direct route for I-69 and, two, assuring that the State of Indiana and the Federal Government move expeditiously to appropriate funding for this important highway project. Delays in attention to either priority will result in the continued loss of

substantial benefits to be realized by Southwestern Indiana and will help to further widen the economic and quality of life gaps between our area and those communities that already benefit from access to a modern, efficient interstate road system.

We urge you to move forward as quickly as possible to approve the direct, new terrain route for I-69 and to appropriate funding for final planning and construction.

Respectfully Submitted,

EVANSVILLE REGIONAL BUSINESS COMMITTEE, INC.

Robert L. Koch II

Robert L. Koch, II - President

RLK/lmw
cc: Mike Grovak, Project Manager
Bernardin, Lochmueller & Associates, Inc.
6200 Vogel Road
Evansville, IN 47715

ERBC Members

Subj: New I-69 Study Form Feedback
Date: 11/6/02 2:21:02 PM EST
From: mike.ball@heart.org (Mike Ball)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Mike Ball
723 SE Riverside Drive
Evansville, IN 47713

Message:
I am in FAVOR of the most direct route between Evansville and Indianapolis Indiana for the new portion of I69 Highway.
Five quick reasons:
1. Safety. Updating the existing US41 corridor to interstate standards will be a hazardous and time consuming problem. I attended Indiana University and am fortunate not to have been involved in traffic accidents on my many drives to and from home. Future generations should have safer access to one of the finest Universities in the United States. 5.12
2. The positive economic impact to the southwestern region is underscored by the decision of Toyota to bring its jobs to the I64/US41 corridor. New businesses are needed in these economically depressed southern counties. When the entire I69 route is completed even more positive economic opportunities will be available for southwestern Indiana. Taxes from these new opportunities will benefit the entire state.
3. I travel to Indianapolis quite frequently. Over the course of each year I would be able to save more than 24 hours annually to spend with my family instead of traveling on highway US41/I70. I do not stop in any of the cities along US41/I70, therefore they will not be negatively impacted by my use of another route. They are not a way point OR a destination for me travels.
4. Updating the existing US41 corridor to interstate standards will cut access to more established farms and businesses than a new terrain route. This will create more hardships for these entities than the reduction of traffic along their route.
5. Let's get on with building this road the process has had enough public forums, discussions and studies. The I69 Study has done its job well, Now let the engineers and construction companies do theirs!
Thank you for this opportunity to express my opinion.

1106-063 Ball, Mike.wpd

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RECEIVED OCT 15 2002

AMERICAN GENERAL FINANCIAL SERVICES

American General Finance, Inc.
601 N.W. Second Street
P.O. Box 59
Evansville, IN 47701-0059
812.468.5500
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rgeissinger@agfinance.com

Frederick W. "Rick" Geissinger
Vice Chairman – Consumer Lending

October 10, 2002

Mr. J. Bryan Nicol, Commissioner
Indiana Department of Transportation
100 North Senate Avenue
Indiana Government Center North, Room N755
Indianapolis, IN 46204

RE: Interstate 69 Project

Dear Mr. Nicol:

I am writing to urge your support for construction of the direct I-69 route between Evansville and Indianapolis, with construction commencing as soon as possible. Interstate 69's construction is vitally important to the future economic vitality of Southwestern Indiana, offering a safer and faster link to the rest of the State and region.

Public debate of the specific route alternatives has been appropriate and important. Based on the facts, and weighing benefits against costs, it is clear that the shortest possible route between Indianapolis and Evansville is the best solution. An additional factor supporting the direct route is the concern for delay and safety associated with the next best alternative (a major overhaul of existing U.S. 41). 5.12

The two required action steps are:

- *selection* of the direct route alternative for Interstate 69; and
- *prompt funding* for the project.

Please join with me in supporting the construction of the direct I-69 route as quickly as possible – a critical matter for our region and people. I look forward to hearing your response.

Sincerely,

cc: Robert L. Koch, II

1010-004

Patrick J. Munson and Cheryl Ann Munson
Consulting Archaeologists
6707 W. Rock East Road
Bloomington, IN 47403
(812) 824-7717

October 22, 2002

Mr. Thomas Tokarski, President
Citizens for Appropriate Rural Roads, Inc.
PO Box 54
Stanford, IN 47463

Re: Review of archaeological study for draft environmental impact statement on proposed I-69 extension, southwestern Indiana, prepared by Bernardin Lochmueller & Associates

Dear Mr. Tokarski:

Per your request, we are writing to provide our comments on the archaeological studies for the draft environmental impact statement (DEIS) on the proposed I-69 extension, southwestern Indiana, prepared by Bernardin Lochmueller & Associates. To begin, we wish to provide background information for our review.

1. We are professional archaeologists, who have worked at Indiana University for more than three decades. In our careers we have had four decades of experience producing archaeological studies for highway construction projects, environmental impact statements, and a host of other federal- or state-funded requirements for archaeological investigations. Our studies geographically include not only Indiana, but also Kentucky, Illinois, Ohio, and Wisconsin, and range topically from earliest prehistoric Native American to historic Euroamerican, African American, and Native American archaeological sites. The investigations we have directed include pre-planning studies, initial surveys, test excavations, and data recovery to mitigate impacts, as well as "rescue excavations" following accidental construction impacts.

2. With one exception, we will comment only on the DEIS study of archaeological impacts for the I-69 alternate routes in southwestern Indiana, not on impacts to standing historic structures and cemeteries. The exception is a historic complex of inter-related historic archaeological features and sites that comprise one of Monroe County's and Indiana's most significant historic industrial resources – the pre-Civil War Virginia Ironworks.

3. Regardless of any criticism we have of the archaeological impact study per se, we are not opposed to the construction of I-69 between Indianapolis and Evansville.

Purpose of Our Comments

Following the letter and spirit of the National Environmental Protection Act (NEPA) and Federal Highway Administration (FHWA) section 4(f) evaluation, we will employ our

1022-017

professional expertise to evaluate whether (a) the data on archaeological resources, and (b) the various interpretations (about density and location of significant sites), as presented in the DEIS, are adequate for making informed choices, based on likely impacts to archaeological resources, among alternatives being considered for project construction. We will review the "Sec. 106 Compliance Plan," which was developed in consultation with the Indiana State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation, as presented in Appendix P, for compliance with the National Historic Preservation Act (NHPA). We will also consider Section 5.13 of the Tier 1 DEIS as it pertains to archaeological impacts, and Appendix M, which describes the "Archaeology Analysis."

We question whether this particular Tier 1 study provides sufficient data and analysis for informed consideration under federal law and regulations, because of the way the study was designed and carried out. We conclude that the data offered in the DEIS on the likely presence of archaeological resources are substantially incomplete and the interpretations/predictions developed from data manipulation to assess likely impacts on those resources are based on assumptions or notions that are scientifically unsupported and logically flawed.

1. Compliance plan questions

The key question is whether the "tiered" approach to assessment of environmental impacts can be consistent with NEPA if the initial tier of data collection and manipulation does not provide adequate information and analysis to assess impacts and make informed choices among the project alternatives. 5.13

A second question is whether Section 106 compliance under NHPA is sufficient for compliance with NEPA when a Tier 2 study will be used to identify impacted archaeological resources rather than the Tier 1 study. How can the consequences of construction in the alternatives be considered when alternatives are not studied at a level of detail sufficient to know or estimate impacts? 5.13

A third question concerns the logic of the methods used in this Tier 1 study – specifically the narrow width of the working alignments (sometimes called "footprint," [App. M, p. 14]) versus the much wider study corridors. For the archaeological impact study, the focus is on the narrow alignments. As such, the only impacts listed are those on previously recorded archaeological sites within the working alignments; see Table 1 (App. M, p. 23). A wider, corridor-wide assessment of impacts would have avoided many likely problems. What happens when the working alignment has to be moved (for example to avoid one of the historic cemeteries or fragile resources that are not plotted on the DEIS maps)? Will it be necessary to redo the DEIS for archaeology impacts whenever the alignment shifts? This seems to be a required course of action since doing otherwise would mean that the recorded archaeological resources in the "revised alignment" would be ignored in project decisions. 5.13

A fourth, related set of questions concerning impact study of the corridors vs. the alignments is that the Tier 1 Record of Decision (ROD) is to approve a single, selected corridor. "The Tier 1 ROD will not select a specific alignment within that corridor." (DEIS, p. 2) But the DEIS for archaeology addresses the "working alignments" (App. M) rather than the wider 5.13

corridors, indicating that there are already-selected alignments within the corridors. Thus, the archaeology impact study indicates that alignments have already been chosen prior to the DEIS. Further, why are the potentially impacted recorded historic sites enumerated for the width of the corridors, but the likely impacted archaeological sites are tabulated only for the working alignments, when NHPA and Sec. 106 applies to both historic and archaeological sites? 5.13

Finally, related to a programmatic agreement on mitigation of impacts to historic and archaeological resources "at the conclusion of Tier 1" (DEIS, p. 2), how is mitigation of archaeological impacts to be designed if the impacted resources are not identified and evaluated until Tier 2? (Can mitigation be planned when you don't even know the resources being impacted?) How can potential impacts to National Register-eligible properties (FHWA 4[f])) be properly considered after the Record of Decision, if the surveys are not done and the site not even identified or evaluated until after that decision? Will consulting parties who have participated under Section 106 be able to participate in the development of programmatic agreements? Will additional consulting parties be able to participate? 5.13

Answers to these legal and procedural questions are very important, and hopefully may be found in environmental or historic preservation case law and best practices in neighboring states. We wish to focus in parts 2 and 3 of our comment on archaeological impacts as presented in the DEIS and as they are required to be studied by multiple federal laws. Since we are archaeologists, not lawyers, we can only raise legal and procedural questions, not answer them.

2. Archaeological Data.

A. Data presented, and the nature of the data. The archaeological site data resulting from a records/literature review for the five 2-mile wide study bands or corridors and 12 alignments being considered is presented as a list of site reference numbers and site cultural periods for the working alignments (Appendix M). This list is abstracted from a larger list of recorded archaeological sites in the corridors that is not presented but which numbers 2,088 prehistoric and historic archaeological sites (App. M, p. 14). The reported archaeological site information was derived from archaeological surveys made prior to the DEIS but not for the DEIS. Probably less than 10 per cent of the land in the various corridors, or for that matter the alternate working alignments, has been surveyed for archaeological resources by discovery methods that meet modern standards. Many of the previous studies reporting sites in these areas are of uneven quality, and data were not reported in a manner that could be used to evaluate resource impacts or to assess archaeological significance or National Register eligibility. Consequently, the lists provided in the DEIS present neither (i) a complete inventory of archaeological resources in the alternate alignments, nor (ii) a data set compiled as a systematic sample of the areas in the routes that could be used for comparing the likely archaeological impacts in the project's alternate routes. In brief, data collection for the archaeological impact study in the DEIS is opportunistic rather than scientific. Scientifically based survey samples are routinely used in archaeological impact studies to choose among alternate construction areas.

B. Data missing? Part I. In the 1990s, Bernardin Lochmueller & Associates ("BLA") carried out, with their archaeological consultants, field surveys of portions of the project's alternative routes to discover archaeological sites. This information was conveyed at a public meeting in May 1996 about the project at Tri North Middle School in Bloomington by Mr. Thomas Beard, of Landmark Archaeological Consultants, employed by BLA. Information from 5.13

those surveys has not been included in the DEIS. Why not? 5.13

Further, we have been told that the report of investigations from those surveys was withdrawn from the historic preservation review process at the State Historic Preservation Office after that report was submitted for review. We do not know who withdrew the report. But why was the report withdrawn, and why was the survey data not included in the DEIS? 5.13

C. Data missing or excluded, Part 2 Unrelated to the DEIS, we have carried our professional work in several small portions of one working alignment, and so had unique expertise to assess how the DEIS studied the likely impacts to previously recorded archaeological resources in this limited area. Over a distance of three miles, four previously recorded archaeological sites are located in the Alternate 3 working alignment and were omitted from the DEIS! Our surveys covered only a small part of the alignment in this 3-mile stretch, so this is a particularly shocking number. Moreover, the sites were recorded more than 20 years ago. How many other parts of Alternate 3 have excluded data? Which other alignments have excluded data? Is 4 archeological sites per 3 linear miles an average figure for the data that was excluded from study? What types of archaeological sites were excluded from consideration? 5.13

Three of the missing sites in the area we studied are prehistoric (12-MO-584, 12-MO-588, and 12-GR-744). 12-MO-588 is little known. However, 12-MO-584 is identified as PaleoIndian, and 12-GR-744 is known to have multiple Archaic and Woodland components and densities of material that indicate a high probability of archaeological features still present below the plow zone. Neither of the sites is located in a floodplain. Both 12-MO-584 and 12-GR-744 would require intensive archaeological survey and test excavations to evaluate their National Register status. 5.13

The fourth site in the alignment that was missed by the DEIS is 12-MO-158, the furnace structure at a complex known as the Virginia Ironworks. It is located in Alternate 3A-B-C, southwest of Bloomington. The ironworks operated from about 1839-1844. The furnace structure has long been recorded by geologists and archaeologists, but our surveys in 2001-2002 revealed multiple related features and sites. Thus, the Virginia Ironworks is the focal point of a larger complex of historic archaeological features that relate to Monroe County's earliest manufacturing industry. In addition to the furnace itself, the complex includes iron mines, limestone quarries, ore and charcoal processing and stockpiling features, structure foundations, house sites (the original Freeland homestead, and then the Adams homestead), former roads, a cemetery (the Adams Cemetery), a house foundation, and in particular extensive sealed archaeological deposits associated with the people who worked at the iron furnace. Many of these archaeological and historic features and structures are also in the alignment, but none are shown on DEIS maps, even though the cemetery and the Freeland-Adams house site had been previously recorded. An existing, occupied structure at the Freeland-Adams house site is shown on the DEIS map, but this is not reported in the DEIS to be a historic structure. That structure, recorded as Indian Creek Township 009 in the published Interim Monroe County Survey of Historic Sites, was built ca. 1880 after the Freeland-Adams house was destroyed by fire. The Virginia Ironworks complex (VIW) is being proposed as a historic district. Its National Register status, when determined, should reference regional significance for this example of pre-Civil War iron industry. However, as the only surviving early iron furnace in Indiana, the "VIW" historic district can also be considered to have state-wide significance. 5.13

In short, the data presented fall far short of informing about the likely presence of archaeological resources in the alternate routes, and some data appear to have been excluded from the study. The excluded or missing data, of course, has considerable bearing on data manipulations, or interpretations made to assess likely archaeological impacts.

3. Interpretations of data.

To compare likely impacts among the project alternatives, the DEIS uses (A) predictions about archaeological site densities and (B) modeling or predictions of locations of likely National Register quality sites.

A. Predicted Archaeological Site Densities. One of the DEIS's manipulations or interpretations of the archaeological data is projection (or prediction) of archaeological site density, using the estimated acreage required for construction of the various alternative routes. The density figure employed is one site for every six acres. The DEIS cites a study by Gary Ellis and others (1989), which refers to a reconnaissance survey in Greene County, for this particular density figure. The DEIS claims this figure to be "a site density predictive model for southwestern Indiana" (App. M, p. 24), but the cited study does not ascribe such lofty status to the particular figure of 1 site per 6 acres. Given the environmental variability in Greene County, let alone other parts of southwestern Indiana, archaeologists who have worked in the region know well that site density varies greatly with respect to the diverse environmental features present. Further, reports indicating variable archaeological site density in the southwestern Indiana region were cited in the DEIS, and others are on file at the Indiana Division of Historic Preservation and Archaeology and were available to the authors of the DEIS. 5.13

The use of a single density measure to compare the likely impacts to archaeological resources of the various alternatives, which contain not only diverse environmental features but also features not present in Greene County, is scientifically, statistically, and logically indefensible. Therefore, the projections in Table 5.13-3 in the DEIS on the estimated density and archaeological sites that would be affected in the various alternate routes are meaningless numbers. These cannot be used to draw any conclusions or make decisions about likely archaeological impacts among the alternate routes because the numbers are not "information." 5.13

B. Prediction of Areas Where National Register of Historic Places (NRHP) Eligible Sites are Likely. The DEIS notes that archaeological resources have been destroyed or severely compromised by plowing, erosion, and modern constructions, but that floodplains of rivers and streams contain stratified prehistoric and historic archaeological resources. The DEIS claims (p. 26), "It is in the floodplains that much of our remaining undiscovered records of the past are to be found." 5.13

As archaeologists who have investigated a number of deeply buried archaeological sites in floodplains, and long argued for subsurface surveys, coring, and geoarchaeological expertise to discover such sites, we find that statement unsupportable. In fact, "much" of our archaeological heritage is represented in mounds, cemeteries, earthworks, villages, farmsteads, and rockshelters, which are not in floodplains. While such sites are not covered by flood deposited sediments and often are shallow, a high proportion of these sites have intact cultural deposits that extend below the reach of the plow (e.g., structural features, storage facilities, refuse disposal areas, burial pits, etc.) or have not been affected by plowing and other recent 5.13

land-alternations. Such sites make up a high percentage of the NHRP-eligible archaeological sites in Indiana and throughout the Midwestern U.S., and some number of them can be expected to be present in the alternative routes. In fact, we have been involved in the excavation of more than 41 such sites in Indiana, and 34 others in Ohio, Kentucky, Illinois, and Wisconsin. On the other hand, systematic archaeological survey of extensive outcrops of floodplain sediments in the Wabash and White River valleys, as well as others, have indicated that sites are far less common in these floodplain locales than they are in exposed outcrops of Ohio Valley floodplains. It would be gross error to focus archaeological evaluation strategies, or surveys and preservation planning, on the floodplains alone, since that would produce a highly skewed representation of the 12,000-year history of human experience in Indiana and our cultural heritage. 5.13

The DEIS promotes its "newly created GIS" for the I-69 project, but doesn't ever use the power of the GIS data set in the archaeological analysis. To be fair, the DEIS says (App. M, p. 27) "The computerization of archaeological information combined with environmental geographical data and modeling software provides endless possibilities that have *only begun* (emphasis added) to be explored." But decisions on the highway are due in about three months, and information about archaeological impacts is needed before these decisions are made. Why is "exploration" only beginning at the time the DEIS is being released, and not before?

Further, we are not told in the DEIS what attributes of archaeological sites would make them NRHP-eligible, nor what procedures or studies were used to select the variables used in making predictions about their location patterns. Nor are we given the statistics to judge how predictions were evaluated and what levels of statistical confidence were achieved. We can only guess where the attributes and variables came from. Are these from systematic analysis of records of NHRP-eligible sites or from the hunches, ideas, or collective experience of archaeological experts? Or are they from archaeologists who – reportedly – stuck pins in maps based solely on their intuitions about archaeological/environmental correlations?

Moreover, the so-called modeling in the DEIS uses opportunistic archaeological survey data rather than scientific survey data, as we noted above in our section 1. Regardless of the type of GIS manipulation or the (unknown) statistical procedures employed, the type of archaeological data utilized is not appropriate for correlating archeological and environmental variables or predicting likely impacts. Further, no predictive modeling statistics are offered in the DEIS to inform about correlation of archaeological and environmental variables or probability of impacts. Even if a computerized archaeological database, a GIS, a set of maps, and a series of statements is claimed to be a modeling tool, it is not necessarily a model – nor can it be reliably used as such in making decisions – if the steps used in developing the "model" are not scientifically sound. Nothing in the DEIS would support a conclusion that the supposed model is sound. 5.13

Predictive modeling is not a new science – not even in archaeology – but it is a science. When applied to a particular problem – such as choosing among alternative construction plans - the assumptions about data, analytical and statistical methods, and all the results must be described in order for the model to be evaluated. In the DEIS this was not done. Very clearly, the DEIS presents neither a model nor anything like a predictive statement that can be substantiated in any way. 5.13

So, where does the DEIS predict archaeological sites of NRHP eligibility to be located? It's hard to say, because the DEIS is silent. The DEIS presents a map showing "a simple correlation ... presented with our newly created GIS modeling toolkit to illustrate graphically where the high probability of National Register of Historic Places Eligible sites are most likely to be found (Figure 2)" (App. M, p. 28). What is being correlated? Correlation implies two or more variables. What variables? Correlation is also a statistical statement. Where are the statistics that inform us about the basis for the prediction, and the confidence that we can have in such prediction? 5.13

Maybe the dark-shaded "predicted areas of potentially eligible archaeological sites" are where the alternate routes cross floodplains, but a simple glance at other maps shows this is not the case for all dark areas. Why is there a large section of "dark shading" along Alternate 1, from Vincennes to the White River? This long tract is certainly not a floodplain, but we have no hint why this large area was singled out. Will this supposed concentration of so-called "predicted areas of potentially eligible archaeological sites" make Alternate 1 a less viable construction alternative? Maps like those in Figure 2 cannot provide sufficient information for any level of decision-making about project alternatives with respect to archaeological impacts because the DEIS and its appendices do not allow the conclusion that they were developed from proper assumptions and methods. Therefore, any decisions based on this type of approach to considering archaeological resource impacts can be challenged as uninformed and scientifically unsound.

Last but not least, the DEIS claims (App. M, p.27), "Although not presented here in this public document to protect specific local cultural resources, the model can easily be zoomed in to refine our area of high probability to specific soil types or characteristics.., slope, aspect, or distance to water." But it is not necessary to compromise protection of archaeological resources in order to present the data used in developing and testing a model that predicts the locations of NRHP-eligible archaeological sites, so the claim of "protection" is not an excuse for failing to describe the essential elements of a predictive model. A map of properly developed and tested correlations would not have to be any more specific than what is illustrated in Figure 2 for the public to be able to evaluate the study of archaeological impacts. 5.13

To summarize, the DEIS's data interpretations of archaeological site densities are unsupportable, and its so-called "predicted areas of potentially eligible archaeological sites" are not scientifically valid predictive statements. Regardless of having a GIS for the DEIS, and something characterized as a modeling tool, what is presented is not a model of anything. 5.13

Because the DEIS missed or excluded previously recorded archaeological site data, including archaeological survey data generated in the 1990s for I-69 alternate routes, and inappropriately used site density estimates and modeling of likely site locations, the impact study is seriously flawed and not usable as a basis for decisions. The clearest example of the failure of the approach used in the DEIS is in a small portion of Alternate 3, where we have first hand information for the working alignment. But in this limited area, neither the listings of previously recorded sites or modeling tell us about likely impacts to the historically important pre-Civil War Virginia Ironworks complex – even though the furnace structure, a historic house, and a historic cemetery were all previously recorded. For all the alternate routes, we can have no confidence that the DEIS reliably or adequately informs us about the likely presence and types of

archaeological impacts for the alternate routes, but we can be certain that the data that were misused for predictions and so-called modeling of likely impacts to archeological resources.

We believe the Indiana Department of Transportation, the Indiana SHPO and Division of Historic Preservation and Archaeology, and the taxpayers of Indiana were poorly served by the archaeological study that BLA and its consultants have carried out for the I-69 extension project. Across the country, high-quality archaeological studies have been submitted to SHPO offices and are being done in advance of highway construction under NEPA and NHPA and in accordance with established FHWA requirements and practices. The I-69 extension project and the people of Indiana deserve nothing less, especially given the high level of interest in archaeology and historic preservation in this state. It is a sad note indeed that – after so many years of study for the I-69 extension project – there is truly nothing in this DEIS of either substance or sound practice to inform decision-makers and the public about the types, amounts, and locations of archaeological impacts in the alternate routes. How, then, can the people who will select the alternate for construction take into account archaeological impacts and minimize harm to these heritage resources?

Sincerely,

Patrick J. Munson
(Associate Professor, Department of Anthropology, Indiana University)

Cheryl Ann Munson
(Assistant Scientist, Department of Anthropology, Indiana University)

cc: Advisory Council on Historic Preservation
Indiana State Historic Preservation Officer
Historic Landmarks Foundation of Indiana
Monroe County Commissioners
Monroe County Council
Monroe County Historic Preservation Board
Monroe County Historical Society

Society of
Architectural Historians
Central Indiana Chapter P. O. Box 1472, Indianapolis, Indiana 46206

24 October 2002

Lyle Sadler, Project Manager
Indiana Department of Transportation
100 North Senate Avenue, Room N855
Indianapolis IN 46204

Dear Mr. Sadler:

Landscapes and roadscapes are documents of who we are--and who we were--every bit as much as papers tucked away in archives. Even the Department of Interior, never very quick to move on such things, is beginning to recognize the fact, and these valuable resources are beginning to be documented and honored as Rural Preservation Districts and Multiple Property Resources. But the process takes time, and the methodology of the consultants was insufficient to identify all the eligible properties. One needed to spend considerable time and travel all the affected routes. (I regret that I was too deep in other work to have taken the time myself.) 5.13

Each of the so-called "preferred" routes will cause destruction of historic resources and of our precious agricultural and forested lands. For example, SR67 has numerous examples of early and mid-twentieth century roadside architecture and sections that are virtual time warps of the 1930s and other periods, but most of these have not been identified. And the reconfiguration of SR37 into I-69 along a new Mann Road corridor proves that important historic resources--never mind agricultural and residential needs--are to be ignored. The Nicholson-Rand House, likely the most magnificent nineteenth century house in Decatur Township and a rare example of rural Gothic Revival architecture, was already rescued once from the wrecking ball by being moved and saved with protective covenants. It is now threatened again, even as the process is well underway for its listing in the National Register of Historic Places. To the consultants' credit, this resource has been reclassified, but only after the owner persisted in having them reexamine their finding that it was not eligible. But how many others are there? 5.13

The Society of Architectural Historians is on record as favoring the route that INDOT chooses to ignore, even though logic and good sense AND fiscal responsibility all point toward routing I-69 along the present I-70 and US41 rights-of-way. 6.2

Thank you.

Glory-June Greiff
President
Central Indiana Chapter
Society of Architectural Historians

1026-012

5 November 2002

Mike Grovak, Project Manager
Bernardin, Lochmueller, & Associates, Inc.
6200 Vogel Road
Evansville, IN 47715

Mr. Grovak:

This letter is written as a comment on the Draft Environmental Impact Statement (DEIS) for the proposed interstate 69. Owen County Preservations (OCP) is an all-volunteer organization concerned with identifying and preserving historic properties and sites in Owen County, and with education of the public about issues of historic preservation. As a group, OCP has no official position on the proposed highway. Some members support its construction while others do not. All members, however, are united by a concern with recognition and preservation of existing historic properties. It is solely within the context of OCP's identity as a group of historic preservationists that the following comments are made.

OCP's main concern with the DEIS in regard to historic resources revolves around the issue of thoroughness. As regards historic structures in Owen County, the DEIS appears to rely very heavily, if not exclusively, on *The Owen County Interim Report*. Additionally, although INDOT, via the consulting agency of Weintraut and Associates, Historians, Inc., solicited input from consulting parties, it did so on an extremely short time table. OCP happened to have anticipated the request for such input, but in the end, the DEIS discounted the input it received from Owen County preservationists. 5.13

Since the spring of 2002, OCP has donated time and expertise as a consulting party under Section 106 of the National Historic Preservation Act. Members and officers of OCP attended INDOT meetings on May 9, 2002, and August 20, 2002. Prior to these meetings, individual members of OCP had begun conducting surveys in Owen County townships thought to lie within the proposed highway's "areas of potential effect" (APE), and subsequently shared the results with Weintraut and Associates. The preliminary list OCP compiled aimed to identify structures that might be considered potentially eligible for listing in the National Register of Historic Places.

At the first "Consulting Party Meeting" at the Indiana Government Center on May 9, Linda Weintraut announced that currently, identification of historic resources "involved looking at the notable and outstanding resources in the Interim Reports published by the Division of Historic Preservation and Archaeology." In the interest of carrying their own survey beyond the admittedly outdated database provided by the Interim Reports, Weintraut asked the attending consulting parties for help in identifying properties that they believed were important resources

that had been omitted from the Interim Reports, or else included, but inaccurately categorized. However, she set a short, and previously unannounced deadline for receipt of such information. Consulting parties were informed that Weintraut would need the information "by the end of next week", that is, May 17, 2002. Having already compiled a list prior to the May 9th meeting, OCP presented Weintraut on the spot with their list of historically significant Owen County structures lying within areas of potential effect.

On July 31, prior to the second meeting, consulting parties were mailed a packet, "Section 106 Findings and Determinations: Area of Potential Effect, Eligibility Determinations and Effect Findings," which included a list of potentially [NHR] eligible properties. The list contained none of the structures cited in the list OCP had provided on May 9th. More disturbingly, it showed a continued reliance on only the "notable" and "outstanding" properties as documented in the *Owen County Interim Report*.

Published in 1994, *The Owen County Interim Report* is now nearly ten years old. It is outdated, and contains some inaccuracies. Additionally, the categories by which properties in the Interim Reports are classified ("contributing," "notable," "outstanding") were meant to be "viewed as advisory recommendations based on information available to the surveyor at the time of the survey. Change in location, sensitive restoration, additional research, extensive physical damage, or inappropriate remodeling could affect the entry's significance and rating at a later date." (*Owen County Interim Report*, p. x). The list OCP compiled and presented to Weintraut attempted to address these problems, but it was discounted.

Though OCP cannot speak with any authority about the historical resources of other potentially affected counties, we would question whether the Interim Reports for other counties have not also been used uncritically as the primary (or perhaps sole) databases for establishing the existence of properties potentially eligible for National Historic Register listing. OCP members attending the second round of consulting party meetings on August 20th also raised questions about the *purpose* of the DEIS's listing of archaeological sites currently *under* the existing right-of-way for US 41. In a letter dated September 20, 2002, we were informed by Bernardin-Lochmueller & Associates of the number of such sites, but questions about the purpose of listing them were left unaddressed. 5.13

OCP would like to remind the project directors that the point of Section 106 of the National Historic Preservation Act is to provide for the dissemination of accurate and up-to-date information to assist policy makers in decisions about projects that may have an impact on an area's historical resources. **OCP is concerned that the current DEIS does not represent a thorough and up-to-date assessment of these resources**, and therefore cannot provide an accurate and reliable tool for selection of a specific route. If this information can only come to light during the Tier II phase of the project, it will at best only serve as a guide for a construction project that is already predetermined. 5.13

We urge the Indiana Department of Transportation and the Federal Highway Administration to conduct a more thorough analysis of historic structures and sites before the project selects a specific route and proceeds to Tier II.

Sincerely,

Bonnie Tinsley

Bonnie Tinsley
Member and President, Owen County Preservations

Edith Sarra
Member, Owen County Preservations

cc: Indiana State Historic Preservation Officer
Advisory Council on Historic Preservation
J. Bryan Nicol, INDOT Commissioner

from:
Owen County Preservations, Inc.
8000 West Sand College Rd.
Gosport, IN 47433

MONROE COUNTY HISTORIC PRESERVATION BOARD OF REVIEW

Courthouse - Room 306
Bloomington, IN 47404
Telephone: (812)-349-2560 / Fax: (812)-349-2967
http://www.co.monroe.in.us/planningdept.html

November 4, 2002

Mike Grovak, Project Manager
Bernardin, Lochmueller, & Associates, Inc.
6200 Vogel Road
Evansville, IN 47715

RE: Comment on the Draft Environmental Impact Statement for the Proposed Interstate 69

Mr. Grovak:

This letter is forwarded as comment on the Draft Environmental Impact Statement prepared for the Proposed Interstate 69 which includes proposed routes that traverse portions of Monroe County. The Monroe County Historic Preservation Board of Review is charged through the Monroe County Zoning Ordinance, with the promotion of educational, cultural, economic, aesthetic, and general welfare of the public thorough the preservation and protection of historic and architecturally worthy buildings, structures, sites, monuments, streetscapes, squares, and neighborhoods located throughout Monroe County. It is within the scope of this charge that the DEIS has been reviewed and the corresponding comments have been made.

The Board's fundamental concern with the DEIS as it relates to the potential impact on historic features in Monroe County centers on the lack of thoroughness associated with identifying features that may be impacted. Relying upon a survey that is more than ten years old without further consultation of local organizations such as the Board or local historic preservation groups causes the completeness of the analysis to be suspect. Throughout much of 2002, the Board has been conducting a review of this same report and has found it to be woefully inadequate relative to accuracy and detail and has initiated action to update the survey. 5.13

Similar concerns exist with the thoroughness of analysis conducted regarding the potential impact on possible archeological sites. To rely solely upon an anticipated density calculation creates an environment in which significant sites may be missed and in which an inaccurate view of possible impact is presented to decision makers. 5.13

An example of this lack of thoroughness can be found in one three mile section of one of the alternatives located in the southwestern portion of Monroe County, where there are four recorded archeological sites that are not identified in the DEIS. One of these sites, the Virginia Ironworks (12-MO-158), the only partially intact pre-Civil War iron furnace in the State of Indiana, lies 5.13

within one of the proposed alignments, yet is not identified in the DEIS. This same area contains a cemetery that is well known to locals and recorded yet does not appear in the DEIS

5.13

The Board is disappointed that they were never directly contacted to serve as a consulting party in this effort, believing they may have been able to greatly enhance the efforts of the consultants retained in this endeavor. The Board trusts that this omission will be corrected in the analysis conducted for the Tier II portion of the DEIS, should a route through Monroe County be selected.

The Board feels it most important to point out that a central purpose for the National Environmental Policy Act and Section 106 of the National Historic Preservation Act is to provide accurate and reliable information to decision makers to assist them in policy decisions, such as choosing whether to build an interstate and if so, where. It is the Board's belief that as presented in the current DEIS, such information has not been provided and fears that at the point such information may become available (during Tier II), it will serve as little more than data to be considered as part of an engineering or construction project, and ultimately a demolition project.

With a project of this magnitude and expense anything short of involving all appropriate parties, conducting accurate and thorough research, and providing decision makers with the best information possible undermines the intent of NEPA and the NHPA, does a disservice to the citizens of Indiana, and may result in irreparable damage to the historical and cultural resources of Monroe County. **The Board urges the Indiana Department of Transportation and the Federal Highway Administration to require a more thorough analysis of the potential impact on historic and archeological features be conducted prior to a decision to build I-69 and prior to the selection of a specific route.**

5.13

Sincerely,

Ron Baldwin
Chairman

Cheryl Ann Munson
Vice-Chairman

Joe Peden
Board Member

Susan Ferentinos
Board Member

Donna Richardson
Board Member

cc: Monroe County Board of County Commissioners
Indiana State Historic Preservation Officer
Advisory Council on Historic Preservation
Bryan Nicol, INDOT Commissioner

DNR Indiana Department of Natural Resources
Division of Historic Preservation & Archaeology • 402 W. Washington Street, W274 • Indianapolis, IN 46204-2739
Phone 317-232-1646 • Fax 317-232-0693 • dhpa@dnr.state.in.us

Frank O'Bannon, Governor
John Goss, Director

November 7, 2002

Janice Osadczuk
Chief, Division of Environment, Planning and Engineering
Indiana Department of Transportation
100 North Senate Avenue, Room N755
Indianapolis, Indiana 46204-2267

Federal agency: Federal Highway Administration

Re: Draft Environmental Impact Statement (Tier 1) for I-69 between Evansville and Indianapolis, Indiana [FHWA-IN-EIS-02-01-D]

Dear Ms. Osadczuk:

Pursuant to the National Environmental Policy Act of 1969 and Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the aforementioned draft environmental impact statement ("DEIS").

As we indicated in earlier, oral comments on the DEIS, we recommend that Table S-6 (and the similar Table 6-1) be revised regarding its "Historic Sites/Districts" line to show potentially eligible properties as well as those listed in, or formally determined eligible for, the National Register of Historic Places. Having compared Table S-6 with Table 8-2, we have surmised that the listed or determined eligible properties shown in Table S-6 (reported as zeroes for all alternates) were limited to those properties within any given *working alignment*. Because of the potential for the project to have impacts on historic properties besides demolitions or other takings (e.g., visual or noise impacts), Table S-6 probably understates the impacts of most or all of the alternatives. Moreover, the working alignments do not necessarily represent the exact location where the highway would be built if any one of the alternatives is chosen.

5.13

Conversely, if one were to rely on the figures in Table 8-3 regarding individual historic properties and historic districts within the study band/APE as an estimate of the number of the properties of various kinds that would be adversely impacted, one would probably overstate the number of adverse impacts that any one alternative would have. This is so because not every individual, potentially historic property or potentially historic district that has been identified necessarily will be determined eligible for the National Register in the later and more intensive Tier 2 NEPA and Section 106 analyses that will be conducted on the alternative that ultimately is selected. Furthermore, not all of the properties or districts that ultimately are determined eligible will necessarily be found to be adversely impacted by the selected alternative. Simply finding an historic individual property or historic district within one or two miles of the selected alternative does not demonstrate that that property or district will be adversely impacted. A detailed assessment of each individual historic property or historic district will be necessary in Tier 2 in order to draw any specific conclusions about adverse impacts.

5.13

As was suggested during our earlier discussion of this subject, goven the information that has been compiled, the most accurate figures to use in Table S-6 for might be those for individual, potentially eligible historic properties and potentially eligible historic districts that are "in the Corridor," as shown in Table 8-3. We realize that even those figures are only rough estimates of the numbers of individual historic properties and historic districts that would be impacted by each alternative, but we think they probably are more nearly accurate than the figures for individual historic properties or historic districts within either the working alignment or the study band/APE. We realize, also, that using the figures for the corridors for this purpose may not be entirely consistent with the way impacts to other kinds of resources (e.g., wetlands or threatened and endangered species) were calculated), but we would suggest that the use of the *corridors*, in contrast to the working alignments, for tabulating the numbers of

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potentially eligible, individual historic properties or potentially eligible, historic districts could be explained adequately in a footnote to Table S-6 (and the similar Table 6-1). 5.13

Based on that proposed revision of the method of tabulating individual historic properties and historic districts that would likely be adversely impacted by any given alternative, we have ranked the various alternatives, based on the number of impacts each likely would have. The alternatives identified in the EIS as "preferred" have been marked with an asterisk ("*"). The alternatives are ranked using the figures in Table 8-3, and are ranked from top to bottom (lowest ranking to highest ranking) to reflect the least number of likely adverse impacts down to the highest number of adverse impacts (i.e., the fewest impacts are ranked first, and the highest number of impacts are ranked last).

Alternative #	Properties in the Corridor	Districts in the Corridor
1	11th	1st (tie)
2A	4th (tie)	1st (tie)
2B	4th (tie)	1st (tie)
2C*	12th	1st (tie)
3A	3rd	5th (tie)
3B*	8th (tie)	11th (tie)
3C*	7th	11th (tie)
4A	1st (tie)	5th (tie)
4B*	1st (tie)	5th (tie)
4C*	4th (tie)	5th (tie)
5A	10th	5th (tie)
5B	8th (tie)	5th (tie)

Looking at these rankings another way, listed in order of the assigned ranking, we see the following:

5.13

Historic Properties

1st	4A, 4B*
3rd	3A
4th	2A, 2B, 4C*
7th	3C*
8th	3B*, 5B
10th	5A
11th	1
12th	2C*

Historic Districts

1st	1, 2A, 2B, 2C*
5th	3A, 4A, 4B*, 4C*, 5A, 5B
11th	3B*, 3C*

Thus, the highest-ranked preferred alternative for impacts on individual, potentially eligible historic properties is 4B, although the non-preferred 4A did just as well. In the same way, the highest-ranked preferred alternative for impacts on potentially eligible historic districts is 2C, although the non-preferred 1, 2A, and 2B did just as well. Arguably only 4B and 4C among the five preferred alternates scored in the top one-half or so of all twelve alternates for least impacts to both individual properties and impacts districts.

Furthermore, we wonder whether Alternative 1, which would require no more than one-half as much new right-of-way as any of the other alternatives, might also cause fewer physical impacts to individual historic properties (not including archaeological sites) and historic districts than any of the other alternatives. The relatively high number of potential impacts to individual properties ranks it only 11th in that category. It seems plausible, however, that a number of those impacts would not be entirely new impacts but, rather, accentuated impacts that the existing US 41 right-of-way, pavement, overpasses, etc., already have on nearby historic properties, in the form of a expanded visual intrusion or increased highway traffic noise. 5.13

In regards to the archaeological aspects of the draft EIS, we have a number of comments and questions. We would first like to stress and reiterate that all necessary archaeological investigations must take place in the chosen preferred I-69 north alternate, including identification, evaluation, and mitigation. We stress that a project of this scope, importance, and magnitude, should aspire to be as complete and thorough as possible in regard to archaeological resources in the project areas, and attempt to cast as wide a net as possible to consider the protection and preservation of these resources. We would also like to underscore that the Tier 1 study has not determined all "potentially eligible" archaeological sites (refer to page 5-80). 5.13

We would like to comment on the statement on page 26 of Appendix M that "much of the archaeological record has been destroyed or severely compromised, making many sites ineligible for inclusion to the National Register of Historic Places." While damage has occurred to many archaeological sites, we would argue that there is a great amount of the archaeological record that still exists in Indiana, and a significant amount of sites which retain information or characteristics making them eligible for the National Register. Thus we would not like a impression left that indicates there is little information left in regard to significant archaeological resources. 5.13

In general, we view the archaeological information in the draft as a more abstract, general view of the archaeological resources. While we agree that the GIS tool is very useful in presenting and organizing data, in terms of the archaeological information presented in the draft EIS, it appears that the information is more of an enhanced data and records check or descriptive set of data than a representative "model" or "predictive model." Although it is stated in the draft that a "GIS archaeological locational database and a GIS archaeological predictive modeling toolkit for use in the southwestern Indiana Tier 1 EIS alternative selection process has been completed," we would state that the database as described is in progress and still merits refining and the addition of information and data relevant to the accurate or precise prediction of the locatins of significant archaeological sites. While recognizing and acknowledging the use of the large amount of information, the information compiled and placed in a GIS format, and that the GIS database is a work in progress, the GIS information is not statistical and is not based upon a representative sample of archaeological resources in the alternatives under study. It does not at this stage appear to precisely "determine predicted site densities" (see Appendix M, page 1), especially those based on a number of natural and cultural attributes. On page 26 in Appendix M, it states that "much of the data required did not exist or was not available in the right format to create useful archaeological predictive modeling tools . . ." 5.13

The model would need to be fine-tuned to more accurately predict specific resources, of a particular time period, a particular site type, National Register eligibility, etc. We note that archaeological resources different in type, such as historical, prehistoric, and cemeteries, were not separately modeled and predicted in any detail. Additionally, there may be archaeological deposits/sites around historical structures, within historic properties and districts, in cultural landscapes, etc. These, or their potential to be present, are not treated in detail in the information presented. Given that the data utilized in the GIS database, from the DHPA, for example, may not be complete or comprehensive, we suggest more local efforts in further studies to find out more about unreported sites, sites not officially recorded, cemeteries, cultural landscapes, archaeological districts, etc. The model does not present a detailed discussion of the known archaeological resources in the study areas, which are the most common, what site types are present where, on what landforms certain sites are found or that certain cultural groups utilized, etc. We would ask for elaboration on what variables were used for the predictive modeling. For example, were soils, elevation, cultural characteristics, landforms, elevation, slope, etc. used to predict site locations? We suggest that the GIS layers and information continue to be updated, refined, and utilized.

We would ask what "over 2088" sites in the five two-mile study bands means, and suggest that these at least be enumerated, and discussed in the archaeological portions of the EIS. Although 122 archaeological sites from the "proposed footprint" of the alternatives were discussed, mention of the other sites might serve to clarify situations when sites are reported to be missing from the study areas. As you know, it has been reported that some sites and resources are missing from some areas of some alternatives (e.g., the Virginia Ironworks site(s) or district). 5.13

Another comment is related to such tables as the Summary in the Environmental Atlas, the table on page S-24, and Table 8-2 (page 8-26), that list 0's in rows for such topics, for example, as sites eligible for or listed in the National Register. This could be misleading or imply that there are or will not be sites in the corridors which are eligible for the register—though there likely will be some, although they may not have been currently identified as such, determined eligible, or their eligibility researched. 5.13

The description in Appendix M (page 1) regarding archaeological investigations which will take place for the project should include Phase Ib investigations, which may be necessary in some cases to better identify and evaluate an archaeological site. 5.13

Some specific comments and questions for Appendix M follow. On page 24, how was the acreage range for the alternates compiled? On page 26, regarding some of the information and documents used, we would suggest that the Guernsey Map may be too general, or at such a scale, that it may not be a very precise indicator of archaeological resources. Why were not sources such as Tanner (1987) or various historical maps for the region consulted? 5.13

You may direct questions about our comments on individual historic properties (not including archaeological sites) and historic districts to John Carr of my staff at (317) 232-1646. Questions about our comments on archaeological issues may be directed to Dr. Rick Jones at the same number.

Thank you for your attention.

Very truly yours,

Jon C. Smith
Deputy State Historic Preservation Officer

JCS:JLC:JRJ:jlc

cc: John R. Baxter, P.E., Division Administrator, Federal Highway Administration, Indianapolis

November 1, 2002

J. Brian Nicol
Commissioner
Indiana Department of Transportation
100 N. Senate Ave.
Room IGCN 755
Indianapolis, Indiana 46204-2273

Dear Mr. Nichol,

The enclosed letter, referring to our application process for the National Register of Historic Places as a Cultural Landscape and Rural Historic District, concerns the community known as Maryland Ridge that is neither marked nor included in the DEIS for the I-69 project released in July of 2002. The Maryland Ridge Community is located at the precise junction of Alternative Routes 3A, 3B, and 3C. As a community, we were extremely concerned to find that the historic and archaeological resources found throughout the community are not included in the section 106 report. We are further concerned to note no inclusion of the unusually high number of karsts, springs, and caves (an extensive report concerning the geological aspects of which has been submitted by Gary Milhoan and dated November 4, 2002) found throughout the community. 5.13

We are pursing the appropriate options to insure the protection of our community's cultural and historic heritage, our water sources, and the federally protected Indiana Brown Bat found extensively throughout our community, each of which the DEIS released in July of 2002 chose to exclude from the report.

Sincerely,

Alexander Scott
Maryland Ridge Community

1101-013

November 1, 2002

Frank D. Hurdis, Jr.
Chief of Registration and Survey
Indiana Department of Natural Resources,
Division of Historic Preservation and Archaeology
402 W. Washington Street, W274
Indianapolis, Indiana 46204-2739

Dear Mr. Hurdis,

The purpose of this letter is to notify the appropriate agencies, including the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, of our intent to submit an application for the community historically known as "Maryland Ridge" to the National Register of Historic Places as a Cultural Landscape and Rural Historic District. The significance of the Maryland Ridge Community to state and national historical and archaeological preservationists is found in its unequalled history as an industrial and agricultural community founded, cleared, worked, and developed cooperatively by early black, white and freed black settlers as a part of the anti-slavery movement of the early nineteenth century history of the State of Indiana and the United States of America. The community is located in a three to seven mile wide band along the Monroe and Greene County line in South-Central Indiana, and includes roughly the vicinity of and between the towns of Elwren, Stanford, and Buena Vista in Western Monroe County; and Hendricksville, Solsberry, and Hobbieville in Eastern Greene County. Although it appears that the actual legitimate landscape based on the period of settlement and development encompasses no less than 75 sections of land and 48,000 acres, we intend to focus primarily on the core area of settlement and development, along the old Spencer-Springville Road, which would allow a more workable area of approximately 25,000 acres.

Placement of "The Maryland Ridge Community" as a Cultural Landscape and Rural Historic District designation on the National Register of Historic Places would lend recognition as well as preservation to an incredible resource irreplaceable in our local, State, and National history as it may be counted among the very rare, and possibly only, remaining early examples of the uniquely American diversity combining anti-slavery, industrial, agricultural, and religious movements into a single community (Diane Perrine Coon, Historian of African-American Agricultural and Industrial Settlements in Indiana). The quality of significance to American history, archaeology, and culture is present throughout the district and is communicated through sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, feeling, and association. We believe these will well meet the criteria for evaluation of the significance of archeological properties and rural historic districts: Association with events that have made a significant contribution to the broad patterns of American history; Association with the lives of persons significant in our past; Embodiment of the distinctive characteristics of a type, period, method of construction, representing a significant and distinguishable entity whose components may lack individual distinction; And that will yield information important in the history of the anti-slavery, agricultural, industrial, and religious movements of the United States. Further, the district includes the deep-rooted history of development, and continued existence of a unique community whose distinct cultural heritage has survived more than 185 years through the lives and culture of the direct descendants of the original settlers who continue to comprise the vast majority of property owners and community members.

First, the significance of the historic and cultural anomaly known as Maryland Ridge is communicated archaeologically in the vast resources which remain from the period of settlement, 1816 to 1839, throughout the community. These include the limestone and iron ore mines; the actual Randolph Ross and Son's Virginia Iron Works blast iron furnace; artifacts including the cast iron gear by which the blower was operated, and numerous products scattered throughout the community; as well as the home sites of Randolph Ross, Hardy Sparks, Robert Roberts and as many as forty other pioneers thus documented and believed to be associated with the Iron Works. Included in the community are the homesteads and sites of Benjamin Freeland, Judge John Sedwick, Daniel Rawlings, Zebulon Alexander, and other abolitionists bringing former slaves from Calvert County, Maryland. These are surrounded by the sites of the homes, quarters, and cemeteries of the freed slaves they accompanied; numerous farms and properties cleared and built communally by white and black settlers together; original county and industrial roadbeds displaying economic, immigration, and social patterns; and local farming roads and agricultural patterns, many still utilized communally which continue to display and communicate distinct agricultural, industrial, and economic relationships; and cultural paradigms which have contributed to the community's success, cohesiveness, and longevity. Further archaeological evidence would include objects and artifacts found extensively at various sites densely scattered throughout the community, and which are likely to yield vital information concerning each of the movements during the period of settlement.

Second, application to the National Register of Historic Places as a Cultural Landscape and Rural Historic District will include the period of community development from 1840 to 1953 displayed archaeologically, culturally, and structurally throughout the community and visible in no less than 142 homesteads and farmsteads, thus far documented. Again, each cleared and built by a combination of the original settlers, including freed slaves and free black settlers, and their descendants. Existing sites include structures such as houses; barns; outbuildings; spring houses; hand hewn sandstone foundations, cellars, walls, wells, and cisterns; storefronts; churches; etc. These would also include the continuation of culturally distinct interdependent industrial, farming, and social paradigms and communal relationships as displayed through successive periods and as adapted to cultural influences and industrial innovations and technologies: The period from 1840 to 1859 evidences the collapse of the canal system in the United States, and the effects of the Mexican-American War which include the founding of the town of Buena Vista, and the 1850 rewriting of the Indiana Constitution, including the addition of the Thirteenth Amendment purposefully designed to deter further free and freed black settlement; the period from 1860 to 1879 which includes the economic and social metamorphosis ignited by the Civil War on farming and religious practices and which display immediate affects concerning the changing role of women in community affairs, as well as diverse belief systems surrounding hatred, prejudice, and race as evidenced by the onset of the Ku Klux Klan in neighboring communities and its effects on both black and white community and cultural development; The period from 1880 to 1909 and the effect of the Illinois Central Railroad on farming, social, and community development; the period from 1910 to 1929 and the effects of World War I and modernization which followed; and the period from 1930 to 1953 including the affects of the gasoline engine, the great depression, the building of three state highways; the effects of World War II, and the further advancement of the role of women in the community and the workforce; and the affects of the decline of rail. Objects and artifacts which display and communicate significant agricultural, industrial, and social change through these periods include a multiplicity of nineteenth and early twentieth century farming and industrial equipment found at each site. Larger items consist of horse drawn rakes, seed drills, successive plows, thrashers, binders, steam engines, etc from throughout the nineteenth and early twentieth century.

Remaining histories and record keeping regarding families and sites provide invaluable information concerning further trends and innovations as well as other community based social, business, and farming developments and practices. Primary and secondary sources evidencing the changing role of women from the post Civil War period through the post World War II transformation of the American middle class. (Later, post-significance, periods will evidence the changing role of women in the Maryland Ridge Community to the predominance of equal and/or primary heads of households).

Third, the application will include the homes and ancestral homesteads of significant persons associated with Indiana and U.S. culture and history as found in the Maryland Ridge Community: Marion Blair, who painted the portrait of Indiana Governor Oliver Perry Morton during the American Civil War, and portrait of Abraham Lincoln from the funeral bier; the history and home of Mae Lee Everett, the great grand daughter of General Robert E. Lee, whom the community rescued from institutionalization, caring for her until her death in 1970. Ancestral homes would include the family farm and homesteads of the Indiana writer Booth Tarkington; the home and family farmstead of country music legend Joe Edwards, and the family farmstead and ancestral home of Hoagy Carmichael.

Discussion of the Maryland Ridge period of settlement will describe four primary migrations of Eastern seaboard Euro-American and African-American settlers between 1816 and 1839 along what had been the Spencer-Springville Road near the Monroe and Greene County Line Road from Owen County South to Lawrence County. It appears that the first three migrations to the Maryland Ridge area were a direct result of the anti-slavery sentiment building in the Southern and Eastern Seaboard States at the time, and were each directly tied to Calvert County, Maryland. While the fourth and final movement was directly due to the presence of pre-historic iron ore deposits and mines along Indian Creek, located in the heart of the community, further community development appears to have occurred as a direct result of the Virginia Iron Works. Even this group appears to have ties with the abolitionists of Calvert County, Maryland. The general history of settlement is as follows:

The Benjamin and Sarah Richardson Freeland family had been wealthy Maryland shipbuilders. In 1816, because of strong anti-slavery principles, the family decided to free all 125 of their slaves and immigrate to Indiana as it was designated a free territory by the Northwest Ordinance of 1787. Six families of former slaves accompanied them along with other white abolitionists including Joseph and Lydia Richardson Freeland, Robert and Jane Freeland, George and Rebecca Freeland Adams, Elizabeth Adams (George's Mother), Judge John Sedwick, Daniel and Rebecca Rawlings, Zebulon and Mary Whaley Alexander, and possibly others. Evidence suggests that other former slaves and freed families may have accompanied the Freeland Party. Family, local, and county histories indicate that an agreement was made between the white settlers of the Freeland Party and the black settlers such that the black settlers would settle with the Freeland Party in the new community for a period of five years to help clear the land for farming in repayment for their passage to Indiana. While all of the black settlers appear to have been released from their agreements after the first year, it seems at least some chose to remain in the community for the remainder of their lives. This is supported by a combination of factors including census records, written and oral histories, and the presence of the graves of freed black settlers in "white" family cemeteries, as is the case in the Zebulon and Mary Whaley Alexander Cemetery; or "black" cemeteries long a part of the oral histories of such properties as Daniel and Rebecca Rawlings. Additional cemeteries may be eventually documented with other settlers associated with the Freeland Party.

According to census records, and Roger Peterson, African Americans in Owen County 1819-1859, free black households in the 1830 Greene County Census include: Clayborn Bunch, with a household of 10 persons; Israel Bunch, 3 persons; James Bunch, 1 person; Julius Bunch, 2 persons; York Jones, 4 persons; John Michel, 8 persons; Shadrack Moore, 7 persons, and Samuel Nolen, 6 persons. Freed black households in the 1830 Monroe County Census include Notty Baker, 4 persons; Jordon Comet, 4 persons; Andrew Ferguson, 2 persons; John M. Goings, 4 persons; Simeon M. Goings, 14 persons; John M. Roberts, 11 persons; Dickson Stewart, 2 persons; Evin Stewart, 8 persons; and Hillah M. Woodfork, 8 persons. By 1840, the number of "free black heads of households" had actually increased in Greene County, while decreasing in Monroe.

Further, state, county, and family histories concur that Joseph Freeland founded Freedom Indiana in Owen County in 1834 as a settlement for black and freed black settlers. Although Freedom was originally founded as "Freeland" Indiana, the name was soon changed to "Freedom" Indiana. It is not insignificant to point out that not all black settlers in Indiana were former slaves, and that it is important to note many of the original land grants issued by the United States to settlers in Owen County were in fact issued to free black settlers who paid as much as $1000 for a tract of land. Land grants to black female settlers were also recorded. Owen County census data records that many black settlers migrated from Greene County. Simultaneously, after the land clearing agreement between the freed black settlers and the Freeland Party was concluded, six families of black settlers appear in the Owen County Census as having migrated from Maryland in 1817, and having entered Owen County in 1818. As the U.S. Census was conducted only every ten years, it is likely that countless other black (and White) settlers came and went throughout the early nineteenth century period of the community.

The second and largest migration of settlers, the Carmichael Party, to the area appears to have originated in 1826 from Surry and Stokes Counties, North Carolina (Stokes County, N.C. was formed from Surry County, N.C. in 1789). Two things are immediately important to note: First, of the great number of these families to immigrate to Indiana, many appear to have direct ties to Calvert County, Maryland in at least one of three basic forms: they had previously lived in Calvert County, had brothers and sisters in Calvert County, or had married a spouse in or from Calvert County, Maryland. Secondly, many of the family histories and genealogies specifically mention anti-slavery feelings among these settlers who migrated to Indiana. This migration appears to have included the families of Archibald and Martha Pennington Carmichael II, Alexander and Mary Ann Holder Carmichael, Joseph B. and Elizabeth Holder Carmichael, Richard and Mary Graves Carmichael, Adam and Elizabeth Carmichael Fulk, Hugh McWhorton and Martha J. Carmichael Cullison Dobson, William and Sarah Carmichael Martindale, John B. and Elizabeth Carmichael Martindale, David and Frances Weaver, Peter and Lydia Teague Graves, Charles "Carl" and Maria Margaret Krause (Crouse) Holder, John and Elizabeth Breeden Gardner, Isaac and Rebecca Burch Gardner, John and Mary (Shear) Sharr, William Hall (from Maryland), William and Delilah Burch Edwards, George Edwards, William and Lucinda Edwards Carter, San Shelton, Pleasant Fossett, Fuel Burch, William Inman, James and Sanford Stone, Thomas and Nancy Lister Oliphant, James and Christiana Crane, Richard Crane, Charles and Mary Nelson Foddrill, John and Magdelinne Baker Foddrill, James and Brazilla Gordon King, and Charles Burch. While the largest portion of this group migrated together in 1826 there appears to be a 2-4 year period over which a few of the families completed the trip having worked or lived briefly in Virginia, Kentucky, and Tennessee.

Census data in Greene and Owen counties include a great number of freed blacks and black settlers also from North Carolina (including Surry and Stokes Counties), or also having traveled through Virginia, Kentucky, and Tennessee, prior to arrival in Indiana. According to the historian on African American immigration and settlement in Indiana, Diane Perrine Coon, it is likely that freed black settlers accompanied the white settlers from North Carolina. Although we are pursuing information concerning the presence of the descendants of the African American settlers in the Bloomington and Indianapolis areas, like other black settlers of the time, it appears that many left Indiana sometime after the adoption of Article 13 to the Indiana Constitution.

The third migration of settlers occurred in 1834 from Calvert County, Maryland. This party was led by the Reverend Malden and Eliza Cullenbaugh Baker, and included the families of Thomas and Nicea Greaves Breeden, William and Christiana Greaves Fowler, Moses and Drusilla Greaves Whaley, Joseph and Sophia Jane Hall Whaley, John and Mary Whaley, Asa C. and Julian Dobson Whaley, Samuel Hite, Cleverly Day, and Benjamin Coster. This migration appears to be the direct result of the schism in the Methodist Church in the United States: In 1834, an open and incredibly heated disagreement split the Methodist Episcopal Church in the United States between traditional Methodists Episcopals (who believed in a strong centralized conference in Baltimore, and a decidedly pro-slavery doctrine); and a group calling themselves Methodist Protestants (who protested a strong centralized conference in favor of a stronger lay representation in the governing of church affairs; and who were passionately anti-slavery). This schism over slavery was common throughout churches in the South at the time. Upon arrival in the free territory in Indiana, the group began holding religious services calling themselves the Calvert Society. From 1834 to 1839 the Calvert Society met throughout the community in their own homes and in the homes of friends and family members who had previously arrived from Maryland and North Carolina.

In 1839 the decision was made to build a permanent structure. According to church records there was a debate as to whether to build the church in Stanford or "on the hill" West of Stanford. The hill was chosen, and in 1839 John and Mary Whaley deeded the property for the Church and Cemetery to the trustees John Gardner, Isaac Gardner, Samuel Hite, Cleverly Day, and Moses Whaley, and the first log church in the area was built. The Calvert Society, apparently feeling they were on the right side of the anti-slavery issue, kept the traditional name of the Methodist Church, calling it the Methodist Episcopal Church. The early history of the Maryland Ridge church includes a story of a group of "Indians" who had been camped along White River near Bloomfield during the following winter. They had come to the Church during a terrible blizzard and asked to stay until the blizzard had passed in order to insure their families' survival. This is important to note because while the Church was the first in the community and the area, it was not the first built in the county and other churches would have been closer, but the "Indians" appeared to believe this church would take them in. Church records tell us that for three to four nights, the Indians stayed in the Church, and while the women and children slept behind blankets hung near the fireplace, the men, both Indians and settlers, stayed up drinking and dancing each night with one Indian staying awake and sober to watch over the group. Such was the reputation and the nature of the settlers of the Maryland Ridge community. (Although pre and post contact campsites have apparently been identified in the Maryland Ridge vicinity, the pursuit of historical or archeological evidence of Native Americans in the prehistory and history of the community has yet to be undertaken as a potential resource for pre or post contact data). In 1870 the original log church burned, and a second church was built on the site. This church continues to be worshiped in to this day.

The fourth and final group arrived in 1839 from Virginia. This group was led by Randolph Ross who built the Randolph Ross and Son's Virginia Iron Works which, together with the Calvert Society's church, likely became a part of the cultural epicenter and touchstone of the early Maryland Ridge Community. Along Indian Creek on the very edge of a field cleared by both black and white settlers of the Freeland Party, and purchased on contract from George Adams, Benjamin Freeland's son-in-law, Ross built the blast iron furnace. According to the abstract of the present owner, Benjamin Freeland deeded the property to his son-in-law George Adams for his iron works venture. Adams then sold the property on contract to Ross. In 1839 Randolph Ross was land granted or bought on contract a total of 156 acres along Indian Creek. By 1840 he was the largest single tax payer in both Greene and Monroe Counties. In 1841 while most settlers paid $4.00 to $8.00 dollars on average in taxes, Randolph Ross paid $52.25 and in 1842 paid $100.49 in taxes. While his property worth was estimated at $468.00, the improvements made (construction of the blast iron furnace on Indian Creek) increased his property worth to $6360.00, combined with his personal worth of $1600.00, his net taxable worth was $8428.00. This is important to note as it reinforces the belief that not only was the Virginia Iron Works the only early industrial site of its kind in at least this part of Indiana, it was also an important aspect in the development of the community as it employed many settlers, possibly both black and white, from throughout the community during both its construction and operation. Early settlers employed by the Virginia Iron Works may only eventually be confirmed or disproved by the archaeological examination of the sites of persons associated with the blast iron furnace.

The history of Indian Creek Township reports that Randolph Ross brought "a few experienced men" from Virginia, probably including Samuel Ross, Hardy Hannibal Sparks, Asa Blankenship, Henry Homburg, Jackson McGee, and Levin Adams (likely a close relative to George Adams); and employed as many as 30 or more other men from throughout the community. It appears that Ross may have been the nephew or son of David Ross, who was the largest and most famous Iron Works owner in Virginia, who had the reputation of making the best iron in the United States at the time. David Ross's Oxford Iron Works was the major supplier of armaments for the American Army during the War of 1812. It is also known that the $20000.00 necessary for incorporation was supplied by "Eastern investors".

Although it seems likely, by default of proximity, it is unknown whether or not free or freed blacks were employed by Randolph Ross in Indiana, at this time. However, concerning such speculation it is important to note that the Virginia Iron Works is located on the original Freeland property which is believed to include remains of the homes of the freed blacks which accompanied the Freelands from Calvert County, Maryland. At this time, it would also be purely speculation that Randolph Ross left Virginia for the free state of Indiana, due to any anti-slavery inclinations or motivations other than the presence of iron ore. However, it is well known that David Ross "employed" 240 slaves supervised, by white overseers, in the Oxford Iron Works in Virginia. We further know that Randolph Ross's operations were very similar to those of David Ross in Virginia. These included the ownership of the actual iron ore mines, the same specific limestone types necessary in the smelting process of iron ore, the specific types of trees found in the immediate area necessary in the production of charcoal for the furnace (much of the charcoal can still be seen covering the bluff near the remains of the furnace, 160 years later), and the production of tools, pots, spiders, etc as well as the pig iron bars that were shipped by wagon to Louisville and Vincennes.

Concerning the impact of the Virginia Iron Works on the Maryland Ridge Community, while the specific groupings of annual land grants throughout the 1830's suggest communal organization, there is a significantly higher number of land grants recorded on the same day, October 1, 1840 throughout the entire community. This may suggest that as the community expanded either the settlers suddenly had the manpower necessary to clear and improve their properties in order to apply for, often additional, land grants by paying minimal filing fees, or each grantee suddenly had the money to buy the properties at $1.25 per acre. This may also be due to the opportunities provided by the Virginia Iron Works at the same time. Further, at least two cemeteries exist in the immediate area and include the graves of settlers from throughout the far reaches of the community who were directly associated with the Virginia Iron Works, Freeland Party, and Calvert Society. This may be suggestive of the importance of the Iron Works to the community, and the developing identity of the early culture.

Application to the National Register of Historic Places as a Cultural Landscape and Rural Historic District will also include a history of the economic and agricultural development of the community. Unlike many rural and industrial communities, the Maryland Ridge Community had no planned or formal center for social or economic development during or after the period of settlement. Rather, business undertakings and cottage industries are found dispersed throughout the community much like the farmsteads were. For example, stoneware, including jugs, jars, and containers, and later, bricks were made in Hendricksville (founded by Fredrick and Elizabeth Ham Hendricks, also from Maryland, in 1831, and was the location of the first Post Office in Beech Creek Township). By 1850 five men were employed in the pottery shop in Hendricksville. During the early period of settlement, hand and horse mills were operated in the community, but the first water mill did not begin operation until the 1840's. The William "Billy" Carter Mill was located along Indian Creek down stream near what later became the town of Buena Vista. The first whiskey shop in the area was located in the community near Stanford. Sources indicate that during election time, many community members avoided the Stanford area due to its reputation. Dispersed throughout the community were also saddlers, blacksmiths, wheelwrights, carpenters, masons, and others. In what may be described as a rural tradition, what developed was a community based system for the provision of products, services, and labor within the community.

Early agricultural development and farming practices appear to consist of a combination of subsistence and market crops. Although a variety of crops including cattle, pork, corn and wheat were farmed, it appears that as the community developed, and as properties changed hands throughout the community, new owners of a property did not necessarily adapt to the crop previously grown or cultivated on a given property. Oftentimes, a given crop may have followed the various families. Through this practice, specific properties may have been utilized quite differently over time. By default of these cultural farming practices, the cultivation of specific crops on various properties appears to have followed cycles reflective of generational cycles. Therefore, logging may have occurred throughout vastly different areas of the community through time; and the same fields and meadows may have been successively pastured, plowed or timbered quite differently over the successive generations of community ownership and use. While family farming included a subsistence level of farming on each property, community based farming practices were consistently utilized. Crops such as grains and hay were harvested from farm to farm by the same groups of neighbors. This is reflected in the wealth of roads interconnecting many of the farms, and readily seen in the farming practices which continue to be utilized throughout the community today.

Throughout much of the nineteenth and early twentieth centuries, heavy steam powered thrashers were owned by one individual in the community, and successively moved throughout the entire community until each farm needing thrashing would be served. A similar system providing necessary machinery and labor has continued to be utilized throughout the community until the present day. Livestock would be herded or taken to market through a similar process. Neighbors would work together to move each herd until all were moved. This appears most affected by the coming of the railroad as stock pens were placed in Solsberry and Elwren, and the later more significant impact of the use of trucks to move livestock to markets. Similarly, the harvesting of timber was tremendously impacted in the community both by the railroad and later by the use of large trucks in the logging industry. These factors also provide additional insights into the nature of economic, agricultural, and industrial development in the community. Generationally, while some farms may have focused on the production of a specialized crop, like dairy products which were sold throughout the community, subsistence based farms may have sold or taken to market excess produce. For example, many farms had what were called "Sugar Camps". A "camp" consisted of up to several hundred Maple trees which were tapped for sap, and from which were produced maple syrup and a type of brown sugar. Many of these original camps continue to exist, including evidence of the hearths and chimneys where the sap was "cooked down". Like other crops, what was not used by the family was likely sold and traded throughout the community. Similarly, livestock and other produce were traded throughout the community for other goods and services.

Attributes of the natural topography which appear directly related to both settlement and longevity would include the richness and loam of the soil found throughout the immediate area; the alternating steep and rolling hills more easily lending themselves to agricultural use and a long history of generational crop and livestock rotation; the natural intermixture of steeper topography helped to insure the preservation of naturally wooded areas for an ongoing and sustainable long-term development, as well as the later timber production; certain species of indigenous trees were important in the production of charcoal necessary for the operation of the iron works, and accordingly contributed to the community as a choice for the location of the furnace. Lastly, probably among the most important topographical attributes which have contributed immeasurably to the success and longevity of the community are the extraordinary amount of natural springs, which continue to run year round even in the driest of seasons. Documentation of the springs and water tables has been extensive. Thus far, the Indiana Geological Survey has documented approximately sixty karsts and karsts groups including four swallow holes, nineteen springs, and eight caves in roughly nine of the forty sections of property located along the core area of the community. As many as seven springs have been documented on a single farm, while on one neighboring farm was found an artesian spring located on the top of a knoll. The abundance of both limestone and sandstone in the area, utilized in the construction of foundations, wells, cisterns, and chimneys, must be noted. Although specific numbers of nineteenth and twentieth century stone wells have yet to be determined, it appears that there is at least one per farmstead. Specific limestone, as well as iron ore, deposits appear important in the choice of the Maryland Ridge area for the site of the Virginia Iron Works. Contributing to the continuation of the community were the presence of black cherry, walnut, oak, and other hardwoods important in the nineteenth and early twentieth century local furniture and veneer industries. Later the timber industry, present in the community since its founding, became exploited by access to the Illinois Central Railroad. Combined, the attributes of the local environment and topography will likely prove second to culture alone in insuring the survival and longevity of the community.

Methodology will include references to both primary and secondary sources. Primary sources will include U.S. Census data for Greene, Monroe, and Owen Counties, 1820 through 1950; property abstracts and deeds; tax records as provided by county records though the same period; and family letters and records where applicable. Secondary sources will include, written and oral family histories; genealogies including collections from the Indiana Room of the Monroe County and Indiana State Libraries. Assistance will be noted from a variety of professionals and scholars in their respective fields of Indiana history, African-American agriculture and history in Indiana, early industrial settlements in Indiana, early American religious movements, rural vernacular architecture, and the early history of Indiana University as it appears three early community members are listed among the trustees responsible for moving the University from the Indiana Seminary to it's present location. Documentation of sites, objects, artifacts, and properties will include extensive photography and the utilization of the Global Positioning System. Over four hundred photographs have thus far been taken and two copies of each printed. Each photograph is associated with a reference number. Each reference number records a description of the shot and includes the direction from which the photograph is taken. Early roadbeds, both county and local, are entirely mapped using the same system. Also mapped utilizing the GPS are farms believed to be cleared by a combination of black and white settlers; stone mounds following streams and creeks accompanying fields and farmlands; original sections of split-rail fencing which displays evidence of stone foundations, often these display generations of barbed wire strung from older trees along the "worm" of the rail fence. All structures will be noted as contributing or non-contributing. Archaeological sites are documented in like fashion homestead and farmstead foundations from the original period settlement. Countless unmarked private and family cemeteries, including those believed to include black settlers are also photographed and recorded. Lastly, it is important to note that for this project we have the support and permission of the vast majority of property owners in documentation and pursuit for recognition from the National Register of Historic Places as a Cultural Landscape and Rural Historic District.

A rough draft application is currently being pursued. This may take several weeks to complete appropriately and in detail. Throughout this process we plan to work closely with the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, the Indiana Historic Landmarks Foundation, and all other appropriate agencies.

Sincerely,

The Maryland Ridge Community

Contributions to date made by,

Dave Abram
Gene and Ruth Askins
Eddie Burch
Bill and Lana Buskirk
Clifford and Mae Buskirk
Bob and Donna Cardwell
Robert Carmichael
Gary and Judy Cobb
George and Beverly Cooper
Jon Cummings
Larry and Marry Dobson
David Dodrill
Tom and Vickie Edington
Jeff and Rachel Fender
Nancy Fender
Tom and Penny Foster
Sandra Fowler
Lucille Fowler
Joan Gardner
Mike Gardner
Phillip Gardner
Brian Garvey
Kathy Gill
Henry Grubb
Brenda Havens
Mike and Kathy Hedrick
Bob and Robin Hoffman
Todd and Marianne Inman
Larry and Marsha Martindale
Herbert and Mildred Martindale
Gary and Barb Milhoan
Harold Moore
Terry Myers
Larry and Linda Patterson
Shelly Patterson
Maxwell Quimby
Steve Quimby
Jim and Michelle Rice
Clyde and Evaleen Sanburn
Edith Sarra
Alexander Scott
Richard and Donetta Sira
Lorraine Sirucek
Ron Siscoe
John Smith and France Knable
Roger Snow
Dianna Gardner Stapleton
Tim and Terri Strauser
Tom and Shirley Sullivan
Rudolf F. Turner
Cleo Vernon
Jody and Wayne Vaught
Jeff and Tracey Wagner
Marvin and Kay Wagner
Mike Wanchic
Bill and Brenda Watkins

cc: John L. Carr, IDNR Division of Historic Preservation; John R. Goss, IDNR Division of Historic Preservation; David L. Isley, Bernardin • Lochmueller & Associates; Dr. James R. Jones III, IDNR Division of Historic Preservation; Tommy Kleckner, Indiana Historic Landmarks Foundation; Andy Knots, Hoosier Environmental Council; J. Bryan Nicol, INDOT; Jon C. Smith, IDNR Division of Historic Preservation; Thomas and Sandra Tokarski, CARR; Curtis Tomak, IDNR Division of Historic Preservation; Linda Weintraut, Weintraut & Associates; J. Reid Williamson, Jr., Indiana Historic Landmarks Foundation

Methodist Episcopal Church

1870 Methodist Church built on the site of the 1839 Methodist Episcopal Church attended by Calvert Society members until 1892

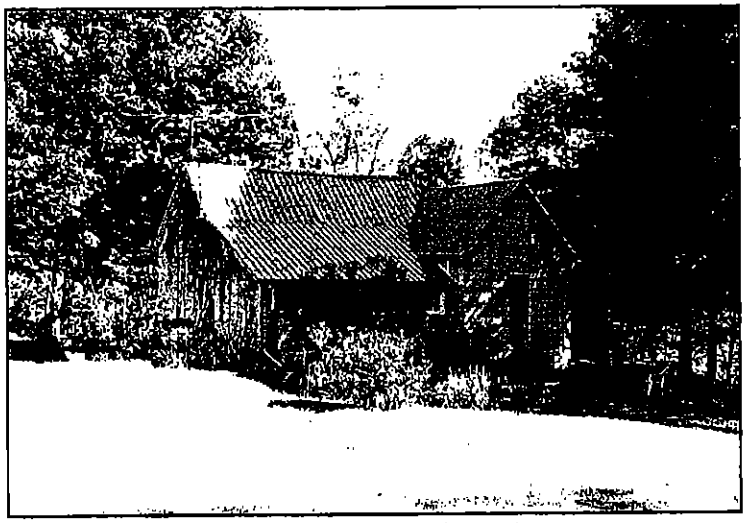
Maryland Ridge Farmsteads

Joseph and Sophia Jane Hall Whaley farmstead built by original settlers on the former site of the Wabash and Erie Canal

Condor farmstead with c.1920 farmhouse and limestone barn. The earlier 19th-century house and barn are still standing

Henry and Catharine Abrams farmstead near Hendricksville

Benjamin Freeland Property



Site of Benjamin Freeland farmstead

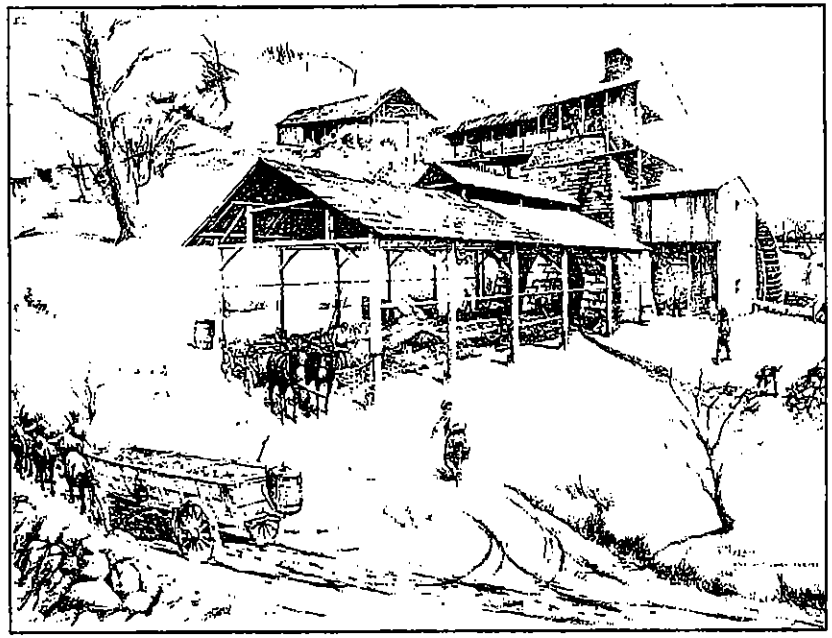
Adams Cemetery: burial grounds of Benjamin and Sarah Richardson Freeland, George Adams, Thomas and Nicea Greaves Breeden, William and Christiana Greaves Fowler and other members of the Calvert Society

Randolph Ross and Son's Virginia Iron Works

View of South wall of blast iron furnace

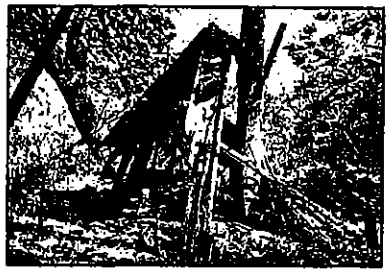
Top of blast iron furnace showing scale

Remains of the gear which operated the blower



Artist rendering of the Randolph Ross and Son's Virginia Iron Works as it would have appeared in 1840

Evidence from Period of Settlement



Remains of Thomas Breeden home

Foundation of Thomas Breeden Barn

Thomas Breeden cistern

150 years of fencing, in the foreground can be seen the "worm" of the split rail fencing; later generations of barbed wire fencing can be seen through older trees, later through Mulberry posts and finally on metal posts

Close-up of older tree (above) showing affects of barbed wire fencing. Similar affects can be seen at greater distances on many trees (right). Although these are from a later period, they are in the "worm" of an earlier split rail fence

Archeological Farmstead Evidence

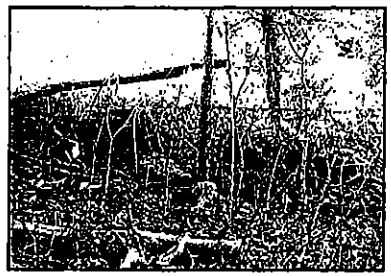
Hand dug sandstone well common throughout Maryland Ridge with many as two or more per farmstead

Foundation stones of Allen Sparks farmstead

Artesian spring on Sparks farmstead

Sandstone embankments bordering fields and creeks are common throughout the community. These were constructed by early settlers while clearing fields to aid in flood and erosion control

Foundation of nineteenth century icehouse



Remains of rock wall along roadbed near Seldom Seen in Elwrenn

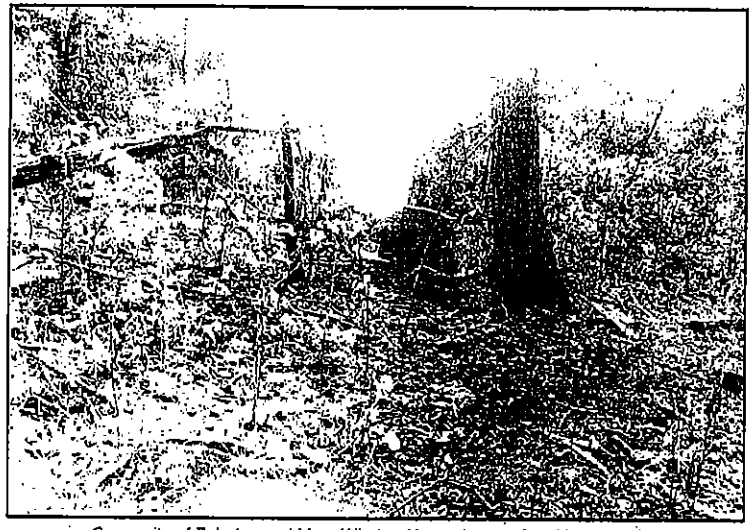
Maryland Ridge Sugar Camps

Sap continues to be visible running from a Maple tree which had been originally tapped in the 19th-century

Joseph Whaley Sugar Camp
Remains of hand hewn sandstone open fireplaces where Maple sap was boiled into Maple syrup and sugar

Remains of Sugar Camp from Thomas Breeden Farmstead similar camps are found on many farms throughout the community

Zebulon and Mary Whaley Alexander Farmstead



Grave site of Zebulon and Mary Whaley Alexander and freed black settlers who remained together after settling in Indiana

Early 19th-century log house located on Zebulon and Mary Whaley Alexander farmstead

Farmstead and Community Roadbeds

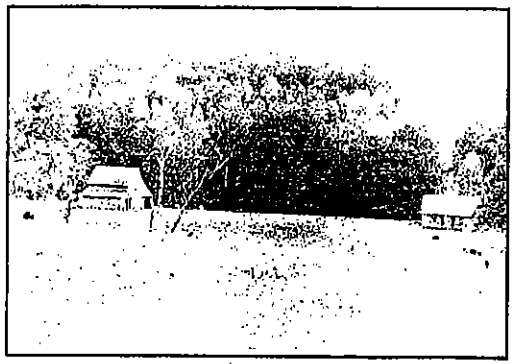
County roadbed is still visible although the road was moved to accommodate an overpass bridge for the Illinois Central railroad near Solsberry

Farmstead roadbed can still be seen on William and Christiana Greaves Fowler farmstead near the site of the original house. A later carriage house and shed can still be seen on the left

Farm roadbeds are visible and still in use throughout the community. A vast network of farm roads continue to connect many farms throughout the community as between the Whaley and Fowler farms

Homes of Log Construction Found Throughout Maryland Ridge

c.1830 log construction house later covered in wood siding, currently in the process of being remodeled. Alternative views display wood siding



Located on the Marion Blair property near Blair Hollow, the farmstead continues to be produce cattle and hay

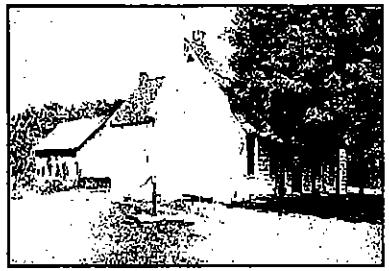
c.1830 log house, post reconstruction, and located on the Harley Breeden farmstead

Homes of Original Settlers
Constructed by the Same Group of Local Carpenters

c.1840 Paris Edwards house on old Solsberry Road

c.1840 George and Ladocia Burch Edwards house

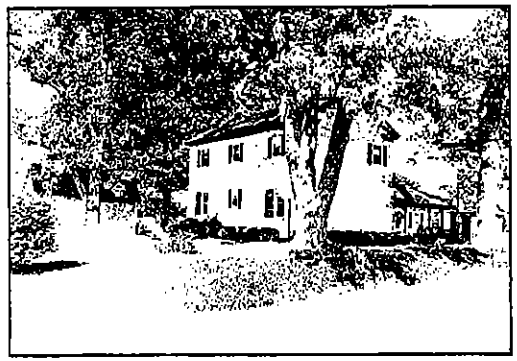
c.1840 central passage house



c.1840 Joseph and Sophia Jane Hall Whaley house

Maryland Ridge Homes

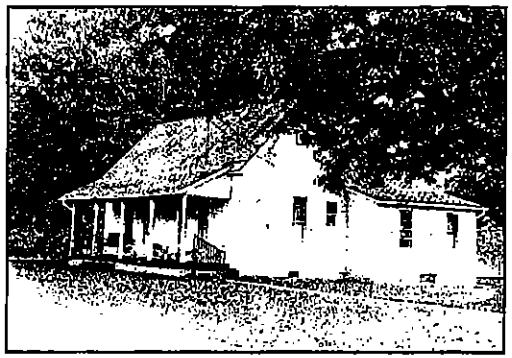
Carmichael house in Jonesboro, now called Hobbieville



Burch house near Freeland property in Indian Creek Township

Custis house near Solsberry

19th-Century Homes

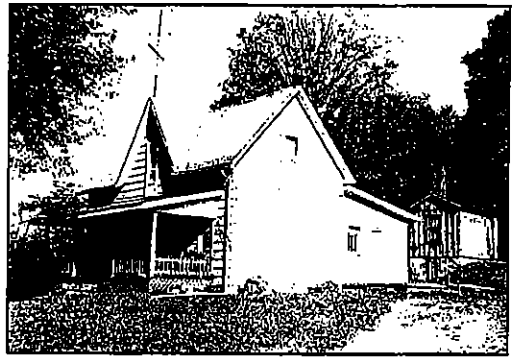


c.1870 double pen near Hendricksville

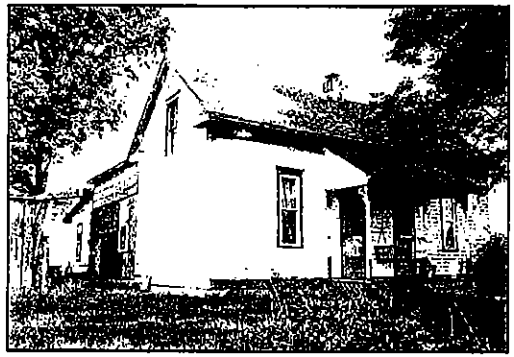
c.1860 Johnson house

Latter 19th-century Folk Victorian house

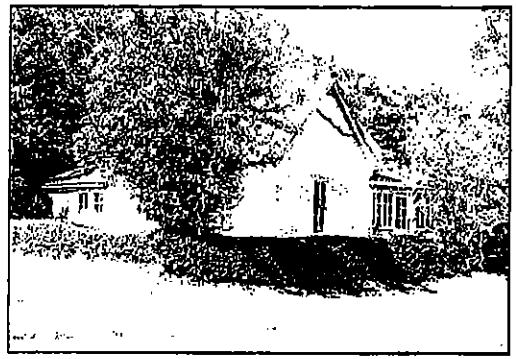
19th-Century Homes



Center-gabled double-pen house near Solsberry

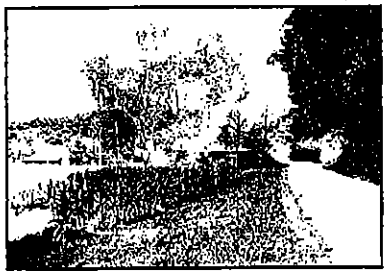


c.1850 double-pen house on farmstead near Stanford

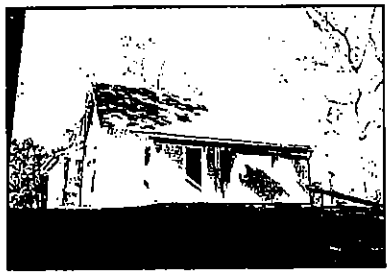


c.1870 house in Hobbieville

Later Generation Maryland Ridge Homesteads



Farmstead between Solsberry and Hobbieville



Close-up of house on farmstead between Solsberry and Hobbieville

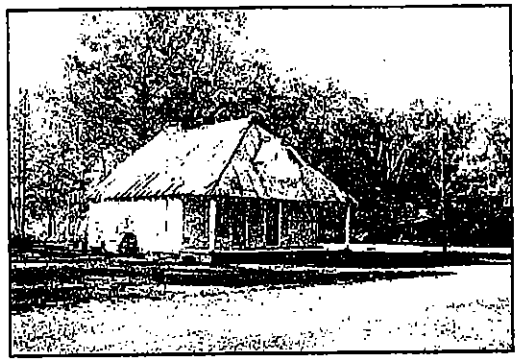
Mid 20th-century homestead near Stanford

Mid 20th-century farmstead near Hobbieville

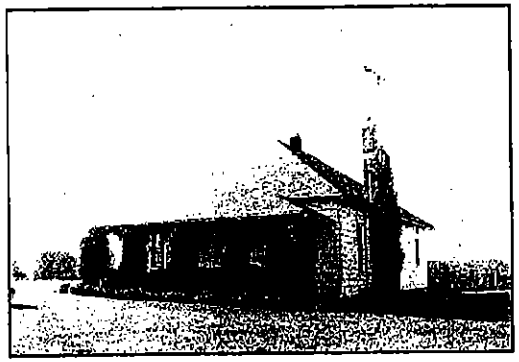
Early 20th-century farmstead between Hobbieville and Stanford

Mid 20th-century farmstead between Solsberry and Hobbieville

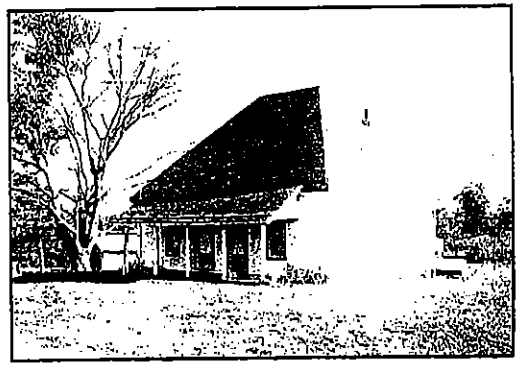
Pyramidal-Roof Homes
Typical of the Community



c.1910 double-pen Roy Sullivan home near Solsberry



1914 double-pen Frank and Vina Fowler home on William and Christiana Greaves Fowler farmstead



c1910 double-pen on Carmichael farmstead

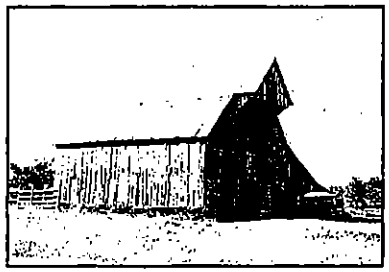
20th-Century Indiana Limestone Homes

1920 Joseph Thompson home on Daniel Rawlings farmstead owned by Maxine Whaley Barrett

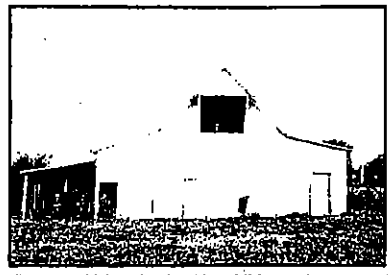
Other Indiana limestone objects designed and carved by Marshal Barrett and found throughout the Maryland Ridge community

1948 Harley and Ersie Shaffer home on Zebulon and Mary Whaley Alexander farmstead

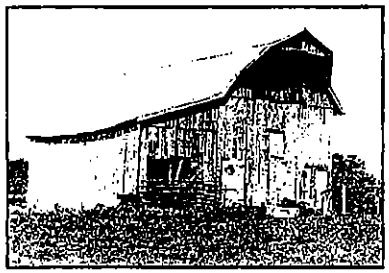
19th and Early 20th-Century Barns



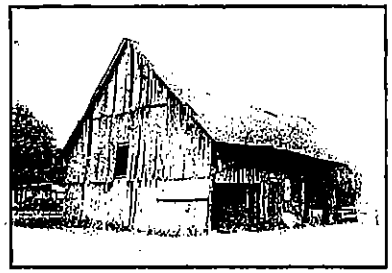
Joseph and Sophia Jane Hall Whaley farmstead Midwest three-portal barn



Frank and Vina Fowler 1920 Midwest three-portal barn on the William and Christiana Greaves Fowler farmstead



1909 barn on the Zebulon and Mary Whaley Alexander farmstead



c.1900 English barn on the Oscar and Olivia Sanborn farmstead

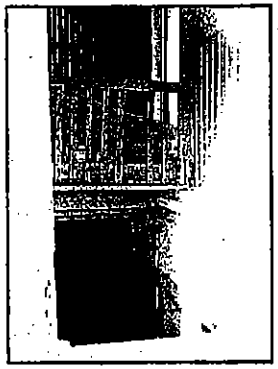
Midwest three-portal barn on the John Whaley farmstead

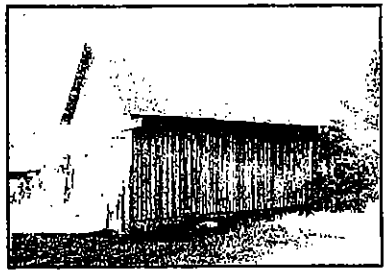
Larger Midwest three-portal barn on the John Whaley farmstead

Sheds or Smoke and Wood Houses

Shed and wood house on the Edwards farmstead

Carriage house and shed on the Paris Edwards farmstead





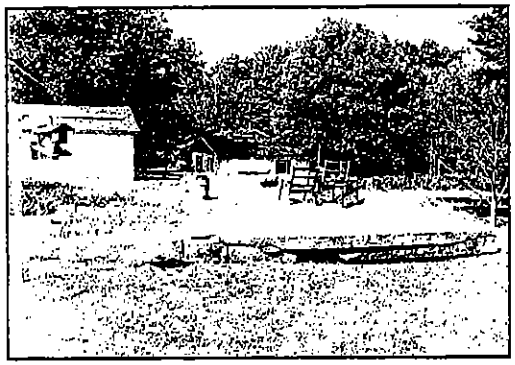
c.1850 smokehouse and cellar on the Joseph and Sophia Jane Hall Whaley farmstead with cellar entrance shown in the picture on the left. Hand-hewn sandstone block construction visible

Corn crib and grain bin on Zebulon and Mary Whaley Alexander farmstead

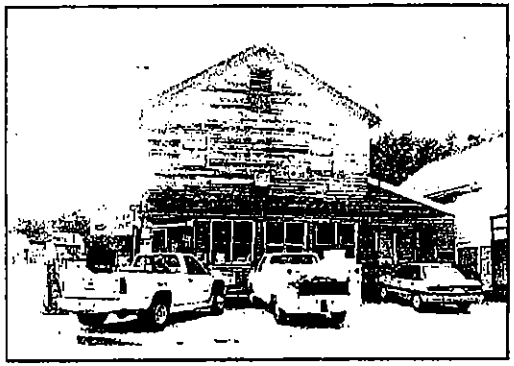
c.1940 wood house and shed near Stanford

Community Groceries

Store owned by William Fowler in Elwren. Closed after collapse of the railroad.

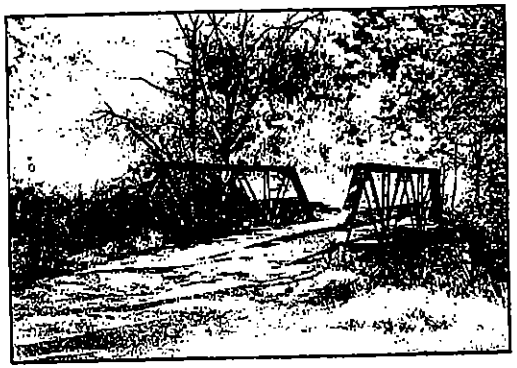


Cellar and foundation to small store located on the Carmichael farmstead which is typical of small businesses that have come and gone in different locations throughout the community for generations

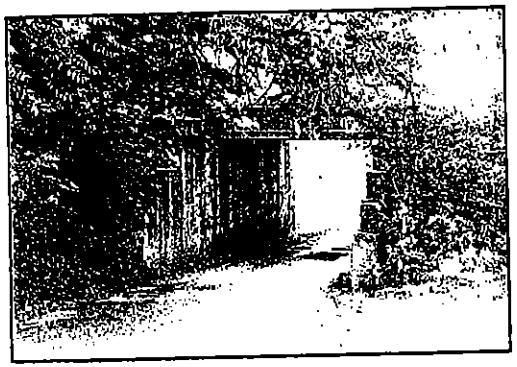


Solsberry grocery store and Masonic Lodge which continues to operate and is a cultural landmark known throughout the community

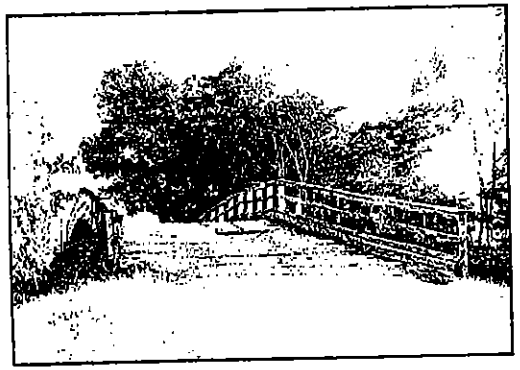
Bridges Throughout the Community



c.1920 Warren pony truss bridge near Hobbieville. This is one of only five left remaining in Greene County



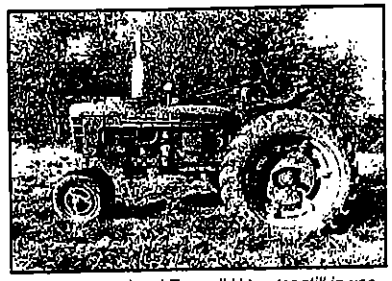
1916 concrete encased steel beam bridge in Solsberry



c.1940 wooden trestle over Illinois Central railroad near Solsberry

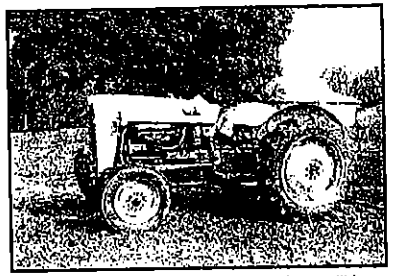
Artifacts

19th-century horse-drawn hay rake and seed drill



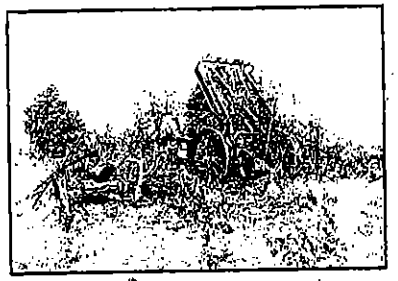
1948 International Farmall H tractor still in use

19th-century horse-drawn manure spreader and steam powered thrasher



1953 Ford tractor, Golden Jubilee edition still in use

19th-century horse-drawn binder



Early 20th-century manure spreader

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

I am totally opposed to ANY New-Terrain Highway. Just from a cost standpoint it seems ridiculous to spend $1 billion more than necessary to save maybe 15 minutes from Indy to Evansville not to mention the enviromental Impact. I Live on the proposed route of Alternative 3 options A, B. The Farm that I Live on has been in my family since 1879. Over the years I have Turned down offers to sell my farm at a very Attractive price. Now there is a very good possibility that I-69 will go thru my Community and my farm. The Community that I Live in is known as Maryland Ridge. Both of my Great Great Great Grandfather's were past of the founding fore-fathers of this Community. Now I-69 may take away the historical significance of this Community for ever. Our community is currently in the process of Applying for designation as a rural historic landscape as well as a Cultural landscape. The applications will be filed by 11-7-02 5.13

No New Terrain Highway

c.c. Peggy Welch
State Representative

RECEIVED
OCT 7 2002

Name BILL BUSKIRK BLA

Address RR 3 Box 504

City/State/Zip Solsberry, IN 47459

0204230

RECEIVED SEP 20 2002

September 17, 2002

J. Brian Nichol
Commissioner
Indiana Department of Transportation
100 North Senate Avenue
Indianapolis, Indiana 46202

Dear Mr. Nichol:

This letter represents my distress and concern about the future of the community where I live which happens to be located in the direct route of the proposed I-69 (routes 3 A, B, and C). All three of those proposals would fragment and/or destroy the community located in Eastern Greene County and Western Monroe County whose original families still occupy the property homesteaded by their forefathers and foremothers in the early 1800's. The original families moved here from Maryland to ensure their religious freedom and the area became known as the Maryland Ridge Calvert Society. The group founded a church known as the Greene County Chapel that still stands as a landmark in this area. In addition to many structures and artifacts (houses, barns, trails, roadbeds, wells; cellars, original fence lines, etc.) there are also many springs and karsts throughout this area. The Geology Department at Indiana University noted this area when the study began ten years ago, but the current maps and routes chose to ignore their study. 5.13

It seems ironic that at a time when politicians are preaching the merits of family values out of one side of their mouths, they are joining ranks to destroy historical family based communities. It is difficult to believe that this entire area has to be destroyed in the name of economic growth and progress. There absolutely has to be another alternative.

Waiting for your response, I am,

Respectfully,

Sandra Fowler
Fifth generation resident of Maryland Ridge in Eastern Greene County

Copy: James Juricic; John R. Baxter, P.E.; Robert R. Dirks, P.E.; Linda Weintraut; Larry Heil; Matt Fuller; Tommy Kleckner; John Goss; Betsy Merrit

0917-014

HISTORIC LANDMARKS FOUNDATION OF INDIANA

Western Regional Office
643 Wabash Ave.
Terre Haute, Indiana 47807
812-232-4534
Fax 812-234-0156
E-mail: west@historiclandmarks.org

FAX COVER SHEET

Date: 11/7/2002

To: J. Bryan Nicol

From: Tommy Kleckner

Fax: 317-232-0238
Phone:

Re: I-69 Comments

Total pages: 3

Please find my comments enclosed.

1107-700

HISTORIC LANDMARKS FOUNDATION OF INDIANA

Western Regional Office
643 Wabash Avenue
Terre Haute, Indiana 47807
812 232 4534
Fax 812 234 0156

November 7, 2002

BY FACSIMILE

J. Bryan Nicol, Commissioner
Indiana Department of Transportation
100 North Senate Avenue, Room N755
Indianapolis IN 46204-2229

SUBJECT: I-69 Indianapolis to Evansville – Tier I EIS Comment

Dear Mr. Nicol:

As a director of the Western Regional Office of Historic Landmarks Foundation of Indiana, I wish to submit my formal comment on the Draft Environmental Impact Statement. I would first like to state that I am not opposed to an extension of I-69 from Indianapolis to Evansville. I am however greatly concerned with the many historic and natural resources that will be directly impacted, if not destroyed by any one of the four "new terrain" alternatives.

As a consulting party for the project, the Western Regional Office has remained involved in the Tier I EIS process and, considering such an extensive project, has been generally impressed with the work of Bernadin•Lochmueller & Associates and their consultants. It is quite evident from their results that the proposed route with the least impact on historic and archaeological resources, not to mention natural resources, is Alternate 1, which follows I-70 and U.S. 41. Alternate 1 is also the most responsible route financially with the least amount of construction needed due to its use of an existing interstate highway and four-lane highway. 5.13

I have personally visited several of the areas of Monroe, Greene, Owen, and Daviess Counties to examine first-hand the historic resources and scenic beauty that local citizens in these areas are attempting to protect. It has become quite evident through my interaction and consultation with these individuals that a "new terrain" route is seen as a direct assault on their heritage and way of life. I urge you to heed their voiced concerns through the comment period. 5.13

The Western Regional Office of Historic Landmarks Foundation of Indiana will continue its efforts to ensure the protection and preservation of those resources threatened by this project. My office will also continue to provide assistance to those who work tirelessly to ensure that Alternate 1 is realized as the best possible route for the I-69 extension.

Nicol Letter, pg. 2

I thank you for your time and for your consideration of my comments.

Sincerely,

Tommy Kleckner

Tommy Kleckner, Director
Historic Landmarks Foundation

cc: James Juricic, INDOT
John Baxter, FHWA
Robert Dirks, FHWA
Linda Weintraut, Weintraut & Associates Historians
Larry Heil, INDOT
Matt Fuller, FHWA
John Goss, DHPA
J. Reid Williamson, HLFI
David Isley, Bernardin Lochmueller & Associates

Nicholson-Rand House
5010 W. Southport Road
Indianapolis, IN 46221
Nov. 6, 2002

Mike Grovak
Project Manager
Bernardin, Lochmueller & Associates, Inc.
6200 Vogel Road
Evansville, IN 47715

RE: I-69 Project
Impact on Historic Structure
Impact on Rural Areas within Indianapolis

Dear Mr. Grovak:

This letter constitutes my comments on the I-69 Draft Environmental Impact Statement issued on July 31, 2002. I have recently purchased and begun the restoration of an important historic known as the Nicholson-Rand House, located at 5010 West Southport Road, on the northwest corner of the intersection of Mann Road and Southport Road in southern Indianapolis. The house has been identified as potentially eligible for national register listing. A copy of the recently-completed National Register nomination for the property is attached. 5.13

For the reasons that follow, I am opposed to construction of I-69 along the Mann Road corridor at the northern Indianapolis terminus of the I-69 project.

Historic Significance of the House.

Today, we take for granted the varied profusion of styles that the Victorian age opened up in architecture. It is now easy to forget what went before. Just a few years earlier, American architecture was almost entirely designed in the Greek Revival or Federal styles, designs which looked backward to the masonry buildings of *Europe*. The Nicholson-Rand House – with its extensive decorative framing and carved woodwork – was part of a new *American* style. As envisioned by A.J. Downing and others, it did not imitate European stonework, but used wood framing as an architectural and decorative feature. The new style proclaimed that America was its own country, rich in great forests, and the style celebrated wood as a primary building material.

As the United States become more urbanized, Downing and others also emphasized what we were losing in an increasingly mechanized and frenzied age. Downing (who was a landscape architect) envisioned not simply an

architectural style, but an essentially "modern" ideal of suburban living in the *country*, in buildings designed to be part of the landscape, with porches designed to be used. The sense of structural aesthetics and architecture as part of the natural environment has been traced from Downing to such quintessentially important American architects as Frank Lloyd Wright. See Vincent Scully's seminal book, *Shingle Style and the Stick Style: Architectural Theory & Design from Richardson to the Origins of Wright* (1983).

The Nicholson-Rand House was built by David Nicholson, a prominent Indianapolis contractor who was well-positioned to appreciate these changes. A mason by trade, he emigrated from his native Scotland in 1852 – shortly after Downing published *The Architecture of Country Houses.* In 1876, while Nicholson was stone contractor for the massive new Marion County Courthouse, he built this house for his residence.

In addition to being a textbook example of Downing-style architecture, the house incorporates many interesting details, including detailed woodwork, staircases, fireplaces, and plaster, as well as rare Indianapolis-made geometrically-patterned tile floors. Although many wooden structures have tended to lose their architectural details, the house's elaborate gable and porch details are unusually intact, as are built-in eaves troughs, gable and dormer spires, roof cresting, and shutters. According to oral histories, the house also incorporates many surplus building materials from the Marion County Courthouse. (Photographs of the house are included in the last six pages of the attached National Register nomination).

This house has long been a fixture in Decatur Township. Stories about the house abound, ranging from tales in a 1939 Indianapolis Star newspaper article to today's ghost stories – the house appears on the cover of Indianapolis folklorist Wanda Lou Willis' recently published book *Haunted Hoosier Trails: A Guide to Indiana's Famous Folklore Spooky Sites* (2002). As I have learned in meeting my neighbors, this is literally a house that Decatur Township kids learn about in school. The unique qualities of the house have also been recognized in historic architectural surveys, having been described in 1977 as the "most unusual structure in south county to date" and in 1987 as "probably the finest house still standing in Decatur Township." The house is currently listed in the Decatur Township Interim Survery as an "outstanding" property.

Plainly, this house is an outstanding – and unique – example of a rare and important architectural style. As explained above, it is also a rural style. Its rural context is a key to understanding it and should be protected. Having an interstate highway roaring through its backyard would be utterly out-of-character to such a property. Wherever I-69 is placed, it should be configured so that it does not impact this house or its rural context; nor should this important resource be cut off from the rest of Decatur Township.

Economic Remedies Are Not Adequate.

This house has previously been threatened by development. At the request of community activists, Historic Landmarks Foundation of Indiana became involved to try to save the property. Negotiations to avoid demolition of the house at its original location failed, so Historic Landmarks arranged to move the house to a new location about a half mile further down Mann Road. Because of the enormous costs which had been incurred to move the house, and the daunting cost of restoring the house to a habitable condition, the house sat vacant at its new location for five years.

I first looked at the house in the spring of 2001. Although the house's condition was appalling, my background in architectural history at Yale made it clear to me that this house was an exceptionally important example of historic architecture in central Indiana. Despite substantial weathering inside and out, most of the original fabric of the structure survived, so I began work on a plan to restore the house. After almost a year of planning and negotiation, I purchased the house in April of 2002. The exterior of the house has been repaired, and all-new utilities and infrastructure were installed in May-July 2002. We anticipate finishing restoration of the windows, walls, bathrooms and kitchen over the next few months.

Restoration of a house like this is expensive. Even with me spending almost every weekend and evening working on the house, the acquisition and restoration costs of this house *will far exceed its market value.* Somebody needed to step up and save this important Decatur Township landmark, and I was willing to make the serious personal and financial sacrifices necessary to do so.

I did so with the expectation that my home would be secure. Although I would be paying more than the house was worth, I had researched the zoning of the property, and had made sure that no new road projects or other intrusive improvements were planned for the immediate area. Then I made my choice based on the historical importance of the house and my expectation that I would be able to amortize what boils down into an investment in Indiana's cultural heritage over the next 30 years. As a citizen of Indiana and the United States, I expected to be protected by zoning ordinances and the due process of law against intrusive uses by my neighbors.

Not only does this house have substantial historical and cultural value to Decatur Township, but I have a substantial personal investment in this house, which was committed to before any notice whatsoever was provided by INDOT that I-69 might run down Mann Road. Paying me fair market value for this property is not an adequate legal remedy and would be unacceptable.

Lack of Notice to Decatur Township of the Newly-Added Mann Road Option.

The July 31, 2002 DEIS was the first public notice that I-69 might *depart* from the proposed S.R. 37 routes, and instead take a route several miles away – and across a river – *for more than 10 miles* down Mann Road. Even the DEIS did not prominently indicate that this new option had been added, as overview maps included in the DEIS did not clearly indicate the new route options. At a meeting of the Decatur Civic Council after the discovery that a Mann Road corridor had been added, it became clear that no one from Decatur Township had been apprised of such a route option. Since then, it has become clear that not even Senator Richard Lugar was apprised of it, despite the fact that one mile of the route would go through his farm. Nor did INDOT provide for any on-the-record public meeting at which the citizens of Indianapolis could voice their opinions.[1]

Plainly, the addition of new route options *within the City of Indianapolis* are significant matters. INDOT's identification of this route at the last minute, and its failure to consult with concerned parties belies Bryan Nicol's assertions about seeking "unprecedented public participation in the study process." It may be true that federal law does not require additional comment; however, as Senator Lugar has indicated, that highway officials working on projects of this magnitude should go "well beyond the requirements of the law in engaging and informing affected communities and landowners about potential routes."

Whether the addition of the Mann Road option was intentional sandbagging or an unfortunate bureaucratic oversight is something which would have to be hashed out in litigation; however, it is clear that Mann Road residents were not provided adequate notice of this route option. If INDOT remains interested in routing I-69 along Mann Road, it should postpone a decision as to this part of the route, and begin a new process of public hearings and comments as to which route is most appropriate for I-69 to enter southern Indianapolis.

The Forgotten "Core Goal" of the Citizens of Indiana and Its Role in Intelligent Planning.

Highway officials frequently discuss the performance of routes in terms of "core goals," referring to reducing travel time between Evansville and Indianapolis, improving accessibility for southwest Indiana, improving international trade, and promoting economic growth and new jobs. While these goals are important, the public debate over I-69 has highlighted the fact that a substantial number of Indiana's citizens are equally concerned about ameliorating the adverse effects construction of a major interstate highway would have on rural areas. Indiana's citizens are concerned about protecting their quality of life – which is as important in attracting high-wage jobs as any other part of Indiana's infrastructure. Indiana therefore must engage in *intelligent* planning so as to site intrusive transportation infrastructure to avoid unreasonable impacts on people's private lives.

Federal Highway Administration documents recognize that interstate highways are noisy and intrusive, and that some uses are more appropriate near them than others. For example, commercial and or industrial uses – where workers typically are inside – are relatively unaffected by noise from nearby highways, while residential housing and parks involve lots of outside and/or sleeping activity, which is incompatible with nearby interstate noise levels. For example, see *Highway Traffic Noise in the United States: Problem and Response.* Thus, the intelligent way to site a project like the I-69 extension is to locate it with other infrastructure which is also noisy, while preserving relatively undeveloped areas for current and/or future residential development.

The south side of Indianapolis already has a large number of large divided four lane highways (I-74, I-65, I-70, S.R. 67, S.R. 37, S.R. 31). Development along them has already accommodated itself to the noise of high volumes of heavy traffic. For example, along S.R. 37, most of the development is commercial and/or industrial, and some of it directly serves the transportation industry already (truck stops, transportation-oriented hospitality industries, etc.) While S.R. 37 has certain issues relating to relocation of certain businesses and road access, changing it into I-69 would not greatly change the area's primarily commercial/industrial development. 6.2

In contrast, Mann Road currently is dominated by residential and agricultural uses, and is in the process of adding a middle school. Thanks to the efforts of local fundraising groups, Southwestway Park is also being expanded into Indianapolis' second largest park, which is composed primarily of athletic fields and nature trails. Nature preserves in particular would be incompatible with a nearby interstate. Other recent development has been primarily residential – which makes sense given the pleasantly rolling land and easy access to Indianapolis. In short, Decatur Township is the kind of place people move to in order to get away from the noise of the city, and undermining such uses makes little sense.

Smart planning would optimize road development so as to be consistent with these uses – not divide the Township with a noisy piece of heavy infrastructure which would significantly intrude upon residential areas, parks and the small amount of farmland which remains in Marion County. Far better that I-69 should be located near compatible uses. While it was once possible for highway departments to run roughshod through local residential communities, such attempts are now certain recipes for difficulty and delay.

[1] The nearest meeting was in Bloomington, an hour's drive away. While INDOT officials attended a meeting sponsored by the Decatur Civic Council, no provisions were made for the meeting to be on-the-record.

Conclusion.

For all the reasons set forth above, I urge that INDOT avoid detrimental impact on the Nicholson-Rand House and the rest of Decatur Township. While I do not oppose I-69, its entry into Indianapolis should take a route that is compatible with other existing uses. The Mann Road corridor is not the appropriate place for this project, and I would urge you to follow Senator Lugar's advice that all Mann Road options be eliminated from consideration. 5.13

Thank you.

Very truly yours,

Robert G. Mork, Esq.

Attachments

National Register Nomination for Nicholson-Rand House
1939 Indianapolis Star Newspaper Article
1977 Indianapolis Historic Preservation Commission Historic Structures Survey
1987 DNR Indiana Historic Sites and Structures Survey

NPS Form 10-900
(Oct. 1990)

OMB No. 10024-0018

United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in *How to Complete the National Register of Historic Places Registration Form* (National Register Bulletin 16A). Complete each item by marking "x" in the appropriate box or by entering the information requested. If an item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer, to complete all items.

1. Name of Property

historic name Nicholson-Rand House

other names/site number 097-086-80118

2. Location

street & number 5010 West Southport Road ☐ not for publication

city or town Indianapolis ☐ vicinity

state Indiana code IN county Marion code 155 zip code 46221

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that this ☐ nomination ☐ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60. In my opinion, the property ☐ meets ☐ does not meet the National Register criteria. I recommend that this property be considered significant ☐ nationally ☐ statewide ☐ locally. (☐ See continuation sheet for additional comments.)

Signature of certifying official/Title Date

State of Federal agency and bureau

In my opinion, the property ☐ meets ☐ does not meet the National Register criteria. (☐ See continuation sheet for additional comments.)

Signature of certifying official/Title Date

State or Federal agency and bureau

4. National Park Service Certification

I hereby certify that the property is:

☐ entered in the National Register.
☐ See continuation sheet.
☐ determined eligible for the National Register
☐ See continuation sheet.
☐ determined not eligible for the National Register.
☐ removed from the National Register.
☐ other, (explain:) _____

Signature of the Keeper Date of Action

Nicholson-Rand House
Name of Property

Marion County IN
County and State

5. Classification

Ownership of Property (Check as many boxes as apply)
- [x] private
- [ ] public-local
- [ ] public-State
- [ ] public-Federal

Category of Property (Check only one box)
- [x] building(s)
- [ ] district
- [ ] site
- [ ] structure
- [ ] object

Number of Resources within Property (Do not include previously listed resources in the count.)

Contributing	Noncontributing	
1	1	buildings
0	0	sites
0	0	structures
0	0	objects
1	1	Total

Name of related multiple property listing (Enter "N/A" if property is not part of a multiple property listing.)
n/a

Number of contributing resources previously listed in the National Register
0

6. Function or Use

Historic Functions (Enter categories from instructions)
DOMESTIC: single dwelling

Current Functions (Enter categories from instructions)
DOMESTIC: single dwelling

7. Description

Architectural Classification (Enter categories from instructions)
MID-19th CENTURY: Gothic Revival

Materials (Enter categories from instructions)
foundation BRICK
walls WOOD: weatherboard
roof ASPHALT
other WOOD: Board and batten

Narrative Description
(Describe the historic and current condition of the property on one or more continuation sheets.)

Nicholson-Rand House
Name of Property

Marion County IN
County and State

8. Statement of Significance

Applicable National Register Criteria
(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- [ ] A Property is associated with events that have made a significant contribution to the broad patterns of our history.
- [ ] B Property is associated with the lives of persons significant in our past.
- [x] C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- [ ] D Property has yielded, or is likely to yield, information important in prehistory or history.

Criteria Considerations
(Mark "x" in all the boxes that apply.)

Property is:

- [ ] A owned by a religious institution or used for religious purposes.
- [x] B removed from its original location.
- [ ] C a birthplace or grave.
- [ ] D a cemetery.
- [ ] E a reconstructed building, object, or structure.
- [ ] F a commemorative property.
- [ ] G less than 50 years of age or achieved significance within the past 50 years.

Areas of Significance
(Enter categories from instructions)
~~Architecture~~

Period of Significance
1876-1952

Significant Dates
1876

Significant Person
(Complete if Criterion B is marked above)

Cultural Affiliation

Architect/Builder
Nicholson, David

Narrative Statement of Significance
(Explain the significance of the property on one or more continuation sheets.)

9. Major Bibliographical References

Bibliography
(Cite the books, articles, and other sources used in preparing this form on one or more continuation sheets.)

Previous documentation on file (NPS):
- [ ] preliminary determination of individual listing (36 CFR 67) has been requested
- [ ] previously listed in the National Register
- [ ] previously determined eligible by the National Register
- [ ] designated a National Historic Landmark
- [ ] recorded by Historic American Buildings Survey #
- [ ] recorded by Historic American Engineering Record #

Primary location of additional data:
- [x] State Historic Preservation Office
- [ ] Other State agency
- [ ] Federal agency
- [ ] Local government
- [ ] University
- [x] Other

Name of repository:
Historic Landmarks Foundation of Indiana

Nicholson-Rand House
Name of Property

Marion County IN
County and State

10. Geographical Data

Acreage of Property 2

UTM References
(Place additional UTM references on a continuation sheet.)

	Zone	Easting	Northing
1			
2			
3			
4			

☐ See continuation sheet

Verbal Boundary Description
(Describe the boundaries of the property on a continuation sheet.)

Boundary Justification
(Explain why the boundaries were selected on a continuation sheet.)

11. Form Prepared By

name/title Glory-Jane Greiff

organization _____ date 14 October 2002

street & number 1753 South Talbott telephone 317-637-6163

city or town Indianapolis state IN zip code 46225

Additional Documentation
Submit the following items with the completed form:

Continuation Sheets

Maps

A USGS map (7.5 or 15 minute series) indicating the property's location.

A Sketch map for historic districts and properties having large acreage or numerous resources.

Photographs

Representative black and white photographs of the property.

Additional Items
(Check with the SHPO or FPO for any additional items)

Property Owner
(Complete this item at the request of SHPO or FPO.)

name Robert Mork

street & number 5010 West Southport Road telephone 317-821-0706

city or town Indianapolis state IN zip code 46221

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C. 470 *et seq.*).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 18.1 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, P.O. Box 37127, Washington, DC 20013-7127; and the Office of Management and Budget, Paperwork Reductions Projects (1024-0018), Washington, DC 20503.

NARRATIVE DESCRIPTION

Located in Decatur Township in the southwest corner Marion County, the Nicholson-Rand house sits across Mann Road from open fields to the east earmarked to be acquired by Southeastway Park, and so to a degree the house retains some sense of its original setting amidst farmland. White River borders these fields on the east. West of the house along Southport Road are a few individual houses of recent construction, sited individually on large lots. To the immediate north and to the south there are individual houses, most of them of modest size and recent construction, on large lots. There is a circa 1910 American Foursquare across Mann Road to the southeast.

The Nicholson-Rand house, now at 5010 West Southport Road at the northwest corner of Southport and Mann roads (the main entrance actually faces Mann Road), was originally located approximately one half mile north at 6510 Mann Road, at its junction with Mills Road. In the late 1990s, the house was threatened with demolition by its then-owner, who wished to develop the entire site as a suburban housing tract and accompanying retail structures. In 1997 Historic Landmarks Foundation of Indiana (HLFI) moved the house to its present location in order to save it from being torn down. The house is oriented on its current site just as it was originally. The two-acre plot at present is barren, but the new owner plans extensive and appropriate landscaping. There is a recently built garage on the site, immediately southwest of the house. HLFI painted the house with a two-color scheme (gold with deep blue trim), as advocated by nineteenth century proponents of the Gothic Revival style in rural dwellings, Alexander Jackson Davis and Andrew Jackson Downing, whose pattern books clearly influenced the building's design.

The house originally had what was presumably a summer kitchen topped with an ornate cupola attached on the southwest, which subsequent owners enlarged and remodeled into a garage, probably in the 1940s. This part of the house was not saved, although the owner salvaged the cupola and plans eventually to rebuild the kitchen addition as it once was.

The two-story house is built on an asymmetrical T-plan, with a gabled roof lavishly decorated with metal cresting and pinnacles at each gable end. Originally slate, the roof is now covered with asphalt shingles. There are two corbeled chimneys and a third, which has been truncated (see photo 1). Characteristic of the style, exposed rafter tails peep from beneath the projecting overhang, which is supported by decorative brackets (see photo 6); each gable end features quatrefoil-patterned

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bargeboards and crossbraces. Above the second story window beneath each gable end is a diamond-shaped attic vent, and the siding around it is board-and-batten, in contrast to the clapboard siding elsewhere on the house. A total of five gabled dormers each feature bargeboard tracery stylistically similar to the main gables. The two on the east facade have metal finials.

The windows boast their original shutter blinds, especially notable since several on the second floor have pointed (triangular) arches. The windows are one-over-one wood frame, double hung sashes. Many still have their original glass. The first-story windows feature small awning-like hoods supported by brackets. Presently, nearly all the windows are boarded, but the owner intends to keep all the original windows intact.

The main east facade (see photos 1,2) on Mann Road contains two gabled dormers south of the east gable end. Nestled in the ell is a porch with chamfered posts and scrollwork brackets sheltering the main entrance. To the south of the porch is a large bay window, which is characteristic of the Gothic Revival style (although usually not as wide), but this was added in the early 1940s, possibly earlier. It is conceivable that the original was a bay window that was simply enlarged at this time. Beneath the gable end on this facade the window treatment is particularly fanciful (photo 3), featuring a scrollwork balcony beneath the second-story window, supported by brackets that extend down onto the top of the first-story windows.

The north facade (see photos 2,4) once contained the main entrance, removed about sixty years ago and carefully remodeled with attention to keeping original detail. The entrance had been beneath a recessed porch, which was enclosed in the remodeling and sided like the rest of the house. A small window presently in the east wall may have been salvaged and remodeled from the east-facing wall originally beneath the recessed porch.

The west elevation, the rear of the house (see photos 4,5), features three gabled dormers centered above a long porch with a hipped roof, supported by posts with brackets enhanced with quatrefoil-patterned scrollwork. From the porch, flanking a large window, are two entrances into the house. All these openings are presently boarded.

Beneath the gable end on the south elevation (see photo 5) are two small triangular arch windows with shaped shutter blinds flanking the center window on the second story, similar to those on the north elevation. The three windows on the first floor are asymmetrically

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placed, the westernmost one being narrower than the other two. The space between the easternmost and center windows is greater, owing to the presence of the chimney within.

Along with its mosaic tile floor (photo 7) in three rooms, the interior of the house retains a surprising amount of its original woodwork, including most of the chamfered door and window surrounds, crown molding, and baseboards (see photos 8,9). With a few exceptions, all the downstairs doorways boast transoms (photo 8); the ceilings are over ten feet high. The transom over the north exterior door on the west side has the builder's initials, "D" and "N," etched in the glass. The front hall features an ornate stairway (photos 9,10) with carved beading, walnut bannister, elaborately turned ballisters, and decorated risers; just as impressive in its own right is the steep back stair (photo 11) in the southwest corner of the house, which despite its humble role boasts decorated risers, turned ballisters and newel post, and a serpentine bannister.

Original plaster ceiling medallions, each one unique, remain intact (see photo 12), and there are two extant fireplaces, one with a wooden mantel on the south wall of the double parlor in the northwest corner of the house, and one with a cast iron mantle in the front parlor at the northeast. The front hall and staircase are between these two rooms; the east entrance is to the south of the stairs. A bathroom, installed about sixty years ago, is located north of the hall in the space where the recessed porch and entrance once was. To the south of the front hall is the dining room, which contains the bay window in the east wall. West of the dining room is the kitchen. The present dining room and kitchen were originally one room, and both still have the original clay tile floor, as does the front hall. The remaining floors are wood, some of which appears to be maple. West of the kitchen, at the southwest corner of the house, are the sinuous backstairs going upwards from a small back hall, which also features a tile floor in a less extravagant pattern. An exterior door opens to the west onto the back porch; likely, it originally entered the kitchen wing.

As was typical, the upstairs rooms are more modest than those downstairs, but still with ceilings well over nine feet high. There are four bedrooms upstairs, plus a bathroom on the north side that appears to have been part of the original plan. The bedroom on the south may be reached from the back stairs and is separate from the rest, obviously a servant's quarters.

The house, having stood empty and neglected for several years, is in the early stages of renovation and most of the rooms are in a very

primitive state or filled with construction materials at present. The rewiring and plaster repair underway on walls and ceilings has exposed the impressive construction of the house; it is solidly framed of yellow poplar with full-dimension two-by-twelve joists with two-by-six studs in the exterior walls, generally on sixteen-inch centers. The rafters are two-by-six.

NARRATIVE STATEMENT OF SIGNIFICANCE

Despite the fact that the Nicholson-Rand house has been moved (out of necessity in order to save it from being demolished in 1997), its architectural significance is such that it remains eligible for the National Register of Historic Places under Criterion C, for it embodies the distinctive characteristics of American Gothic Revival architecture as advanced by Alexander Jackson Davis and Andrew Jackson Downing. The house stands only a half mile south of its original location and retains its original orientation, and it lost very little of its integrity when it was moved, save for the one-story kitchen on the southwest. The house is a stunning example of the American form of Gothic Revival architecture promoted by Andrew Jackson Downing for rural dwellings and appears to be the best example in the whole of Marion County, which was noted in 1977 and 1987, respectively, by architectural surveyors from the Indianapolis Historic Preservation Commission and Historic Landmarks Foundation of Indiana (HLFI). It was HLFI that later moved the house in order to preserve it.

Even the most cursory glance through the pattern books of Andrew Jackson Downing, the influential landscape architect and arbiter of style of the mid-nineteenth century, reveals that the Nicholson-Rand house could easily serve as an illustration of the type of house Downing encouraged for a rural dwelling. He advocated a "truth in architecture" approach, thus, for example, the visible rafter tails that keep the viewer in mind of the building's underlying structure and the fanciful scrollwork that highlights the qualities of the wood of which the house is built, as opposed to treating it as a material inferior to stone. Downing celebrated the picturesque and asymmetrical, along with the use of tracery and carving as ornamentation, now made affordable with the recent development of the scroll saw. As can clearly be seen from the narrative description, the Nicholson-Rand house embodies Downing's ideas. This is an American version of the Gothic Revival influence as disseminated by Downing, built with native materials. Its asymmetry, picturesque window treatments, projecting eaves, decorated rafter tails and brackets,

board-and-batten siding beneath the gables, lacy bargeboard, the multitude of dormers, the entrance porch with its chamfered posts and scrollwork brackets, the shape of the chimneys--all are typical of Downing's illustrations of country houses. Still relatively rural today, this house in 1876 was at least two to three hours from downtown Indianapolis by horseback or wagon over some twelve miles of winding dirt roads. The nearest railroad depot was at Valley Mills, a half hour ride--or an hour's walk--away.

In many ways Downing's principles anticipated several elements of Craftsman houses, and even the work of Frank Lloyd Wright, as noted by architectural historian Vincent J. Scully, Jr. in a number of his writings and lectures. It is certainly reasonable to assume that the builder of the house, contractor and stonemason David Nicholson, was quite familiar with the popular pattern books of Downing. Although *Cottage Residences* first appeared in 1842, subsequent editions appeared with regularity over the next three decades. Downing's *The Architecture of Country Houses* came out in 1850, shortly before Nicholson arrived in America, and went through eight additional printings.

Apart from its obvious Downing influences, what contributes to this house's intriguing past is that it seems likely that some of the materials incorporated were identical to those being used in the Marion County Courthouse under construction. David Nicholson was a prominent stone mason and partner in the business of Scott and Nicholson, which was contracted to do the stone construction work of the massive new Marion County Courthouse designed by Isaac Hodgson. Its cornerstone was laid in 1872. Whether Nicholson purchased extra materials or was given overruns--or whether he saw them being installed in the courthouse and decided he would like the same for the house he was building for himself--is unknown. But local lore for over fifty years after spoke of wagonloads of material carted from the courthouse building site. The colored tile of the floors in three rooms of the house is the same as was in the courthouse, and the interior woodwork is similar.

David Nicholson (1823-1899) was born in Dumfriesshire, Scotland, where he learned his trade as a stone mason. He came to the United States--to Indianapolis--in 1852, soon entering into partnership with a fellow countryman, Adam Scott, who had also learned his trade in his homeland. Their stone yard, originally on Delaware between Washington and Maryland (which, had it remained there, would have been very convenient for their work on the courthouse), was located from at least 1860 on Kentucky Avenue near the old Greenlawn Cemetery, just southwest of

downtown. Nicholson and Scott both lived in houses in close proximity to their business, at least into the 1870s. Nicholson's wife Marion died in 1870, and it appears he soon married again, which may have provided the motivation to build a fine new house in the country near the villages of West Newton and Valley Mills. The house was completed in 1876--the same year as the courthouse, which was formally dedicated in 1877--but the marriage apparently ended in divorce.

After laboriously working for years to complete the house, Nicholson sold the property to Allison C. Remy (1837-1918) in 1879. Remy was a Marion County Commissioner who had just that year completed his three-year term. A few years earlier, in 1875, he had built the Remy Hotel on the southwest quadrant of the Circle in downtown Indianapolis. The sale may effectively have been a trade; in any case, Nicholson ultimately became the proprietor of the hotel (which became the Brunswick Hotel), and Remy the owner of the house and land in Decatur Township. Remy owned several other parcels in the near vicinity on the opposite side of Spring Valley Road (today, Mann Road), totaling about 370 acres. He was a prominent horseman and raised champion trotters. It is uncertain whether Remy lived in Nicholson's recently built dwelling, although one reference in Sulgrove's 1884 History of Indianapolis suggests that he may have for a time. But apparently Remy rented it out to a succession of tenants (perhaps farm managers) during at least part of the 1880s. Ownership of the house over the next decade is unclear, although at one point William H.H. Miller, United State Attorney General under President Benjamin Harrison and his former law partner, is said to have lived in the house, although only family history supports this seemingly unlikely contention.

About 1903 John Lindsay Rand and his wife acquired the house and property, probably from Remy, but possibly from a subsequent owner. The Frank Copeland family was renting the house at the time, and continued to live there for another year, while they were having another house built for themselves. The Rands moved to the area in order to be closer to their only surviving child, daughter Florence, who was married to prominent Indianapolis attorney Wymond Joe Beckett. Beckett himself owned considerable farm acreage in the vicinity, but he and his wife lived in Indianapolis. The Rands lived in the house for the remainder of their lives, then Florence Beckett inherited the property in 1926. The combined Beckett farm encompassed about six hundred acres. The house was then rented to the manager of the farm's dairy operation, and later in the 1930s, to other tenants. The son of Wymond and Florence, Joe Rand Beckett, an attorney like his father, moved into the house about 1940 and lived there with his wife Mary Ann until his retirement in the late 1950s, at which point the Becketts

donated the farm to Depauw University. They continued to live in the house for a time, alternating with a home in Florida. Beckett died in Florida in 1977, whereupon his wife returned to Indiana, living out her days in Greenwood until her death in 1996. Ultimately the university had sold the house and it ended up with an out-of-state owner who wanted the property for residential and commercial development. In 1997 HLFI stepped in to save the house, and when the owner could not be persuaded to alter his plans, the organization found an available parcel about a half mile down Mann Road and moved the house to its present site.

Although a building's being moved from its original site will usually render it ineligible for listing in the National Register, this magnificent house, which would have been destroyed had it been left in its former location, is of a relatively rare style and is a splendid example of its type. Despite the fact that the Nicholson-Rand house has been moved, it is only a half mile south of its original location, on the same road, and set at its original orientation. Its architectural significance is great enough that it still remains eligible for the National Register of Historic Places under Criterion C, for the Nicholson-Rand house embodies the distinctive characteristics of rural American Gothic Revival architecture as advanced by Alexander Jackson Davis and Andrew Jackson Downing.

SELECTED BIBLIOGRAPHY

"Allison C. Remy, 71, Is Dead of Pneumonia." Indianapolis Star, 4 August 1918. p7 c5

Baist, G.William, comp. Real Estate Atlas of Surveys of Marion County, Indiana. Philadelphia 1909.

Beckett, Mrs. Joe Rand. Letter to Indianapolis Historic Preservation Commission, 1 August 1977.

Bohn, Gustav, comp. Atlas of Indianapolis and Marion County, Indiana. Philadelphia 1889. 154

"Built Courthouse; David Nicholson, Prominent Contractor, Is Dead." Indianapolis Daily Sentinel, 9 August 1899. p8 c2

"David Nicholson Dead." Indianapolis News, 9 August 1899. p2 c5

Nicholson-Rand House MARION COUNTY IN

Distler, Allen David. "The Rand Home." Unpublished genealogical research paper, 1996.

Downing, A[ndrew] J[ackson]. The Architecture of Country Houses. New York 1850.

_____. Cottage Residences. New York 1873.

Guthrie, Wayne. "Twin Barns Serve as Landmarks." Indianapolis News, 14 April 1959.

Indianapolis City Directories. 1857-1890.

Nicholson Grave Marker, Section 2, Lot 156, Crown Hill Cemetery, Indianapolis.

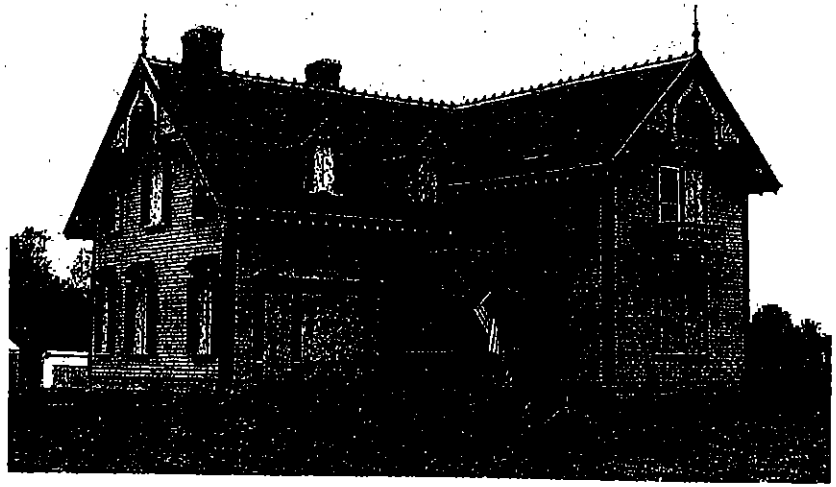
Sulgrove, B[erry] R[obinson]. History of Indianapolis and Marion County, Indiana. Philadelphia 1884.

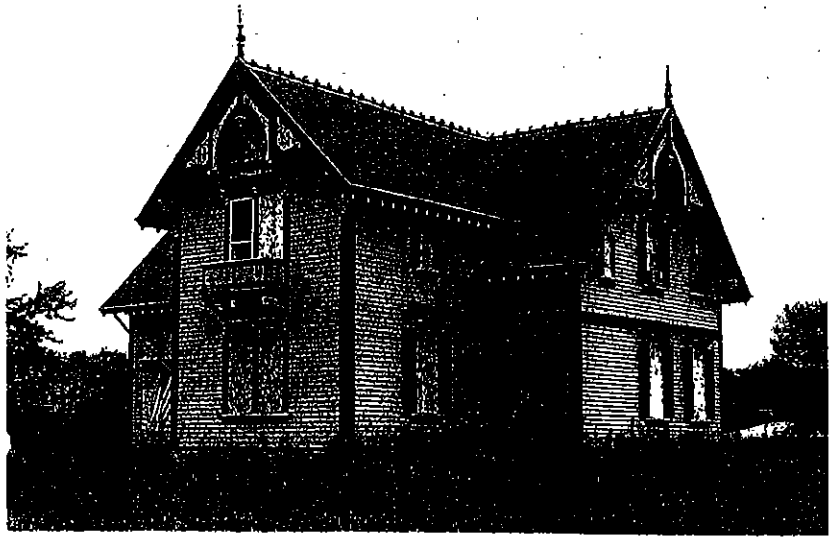
GEOGRAPHICAL DATA

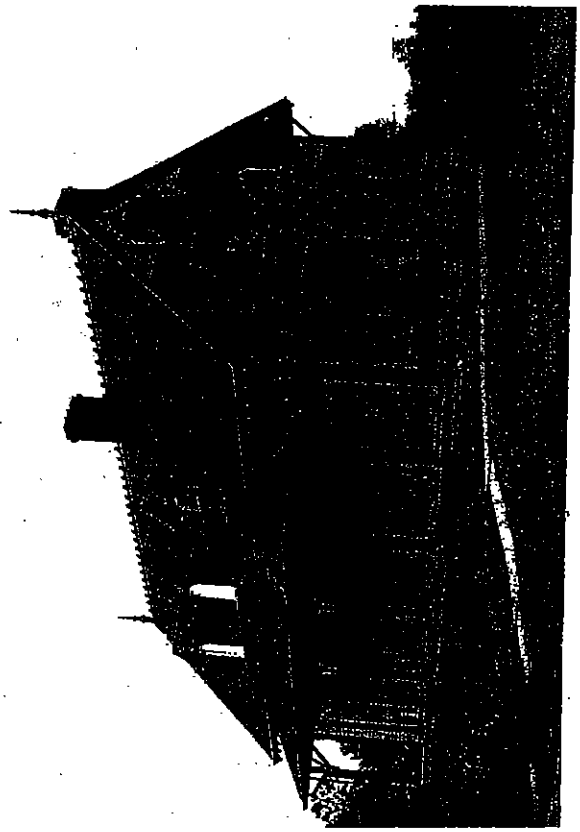
Verbal Boundary Description
Part of the Northwest Quarter of Section 18, Township 14 North, Range 3 East of the Second Principal Meridian, in Marion County, Indiana, more particularly described as follows:

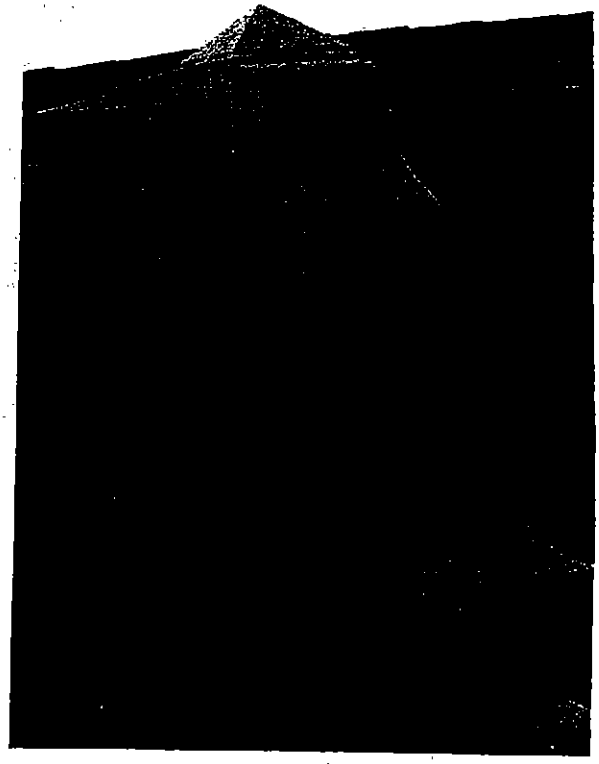
Beginning in the center of the Mars Hill and Spring Valley Road, now Mann Road, at the point which is 697.95 feet south of a point in the north line of said quarter section, which is 1320 feet east of the northwest corner of said quarter section; thence west parallel with the north line of said quarter section 250.95 feet; thence south parallel to the center line of Mann Road 347.16 feet to a point in the center of Southport Road; thence east along the center line of said road and 6 parallel to the north line of said quarter section 250.95 feet to the center line of said Mann Road, thence north along said center line of Mann Road 347.16 feet to the place of beginning.

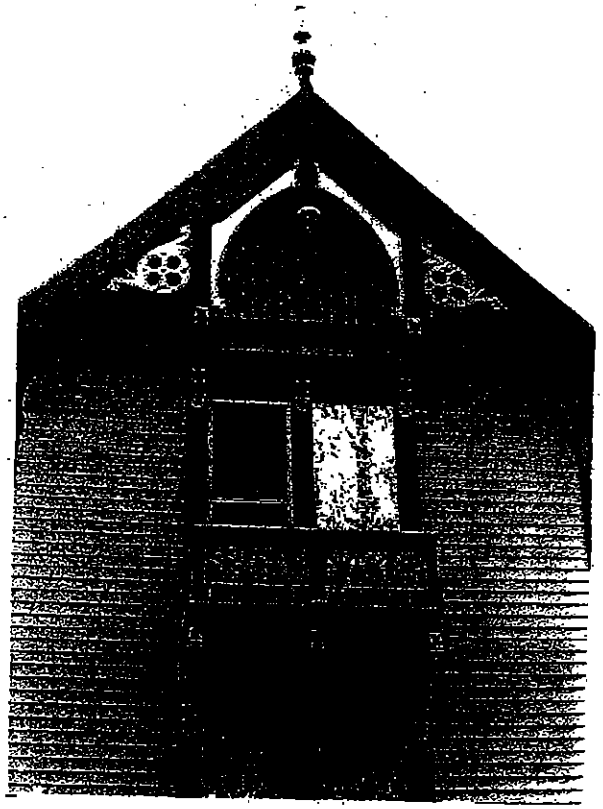
Boundary Justification
Encompasses the boundaries of the property to which this resource was moved.

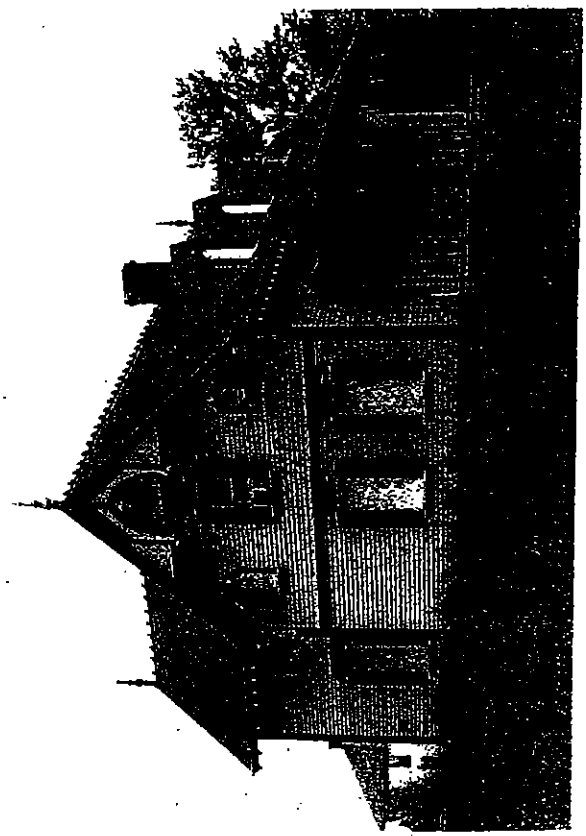


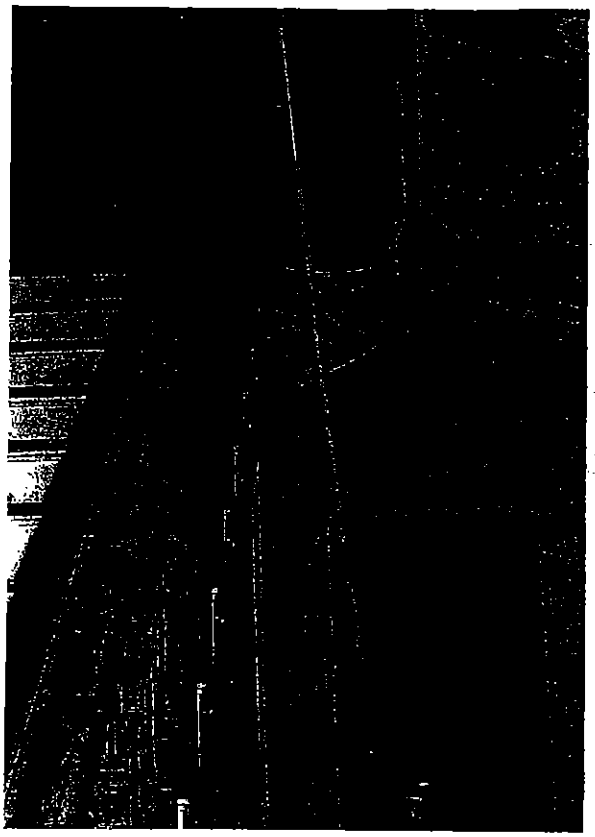












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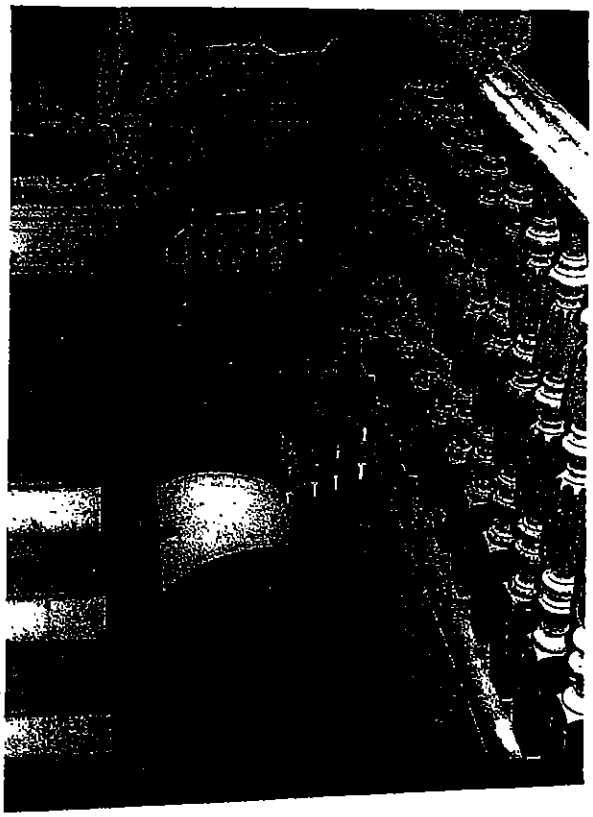

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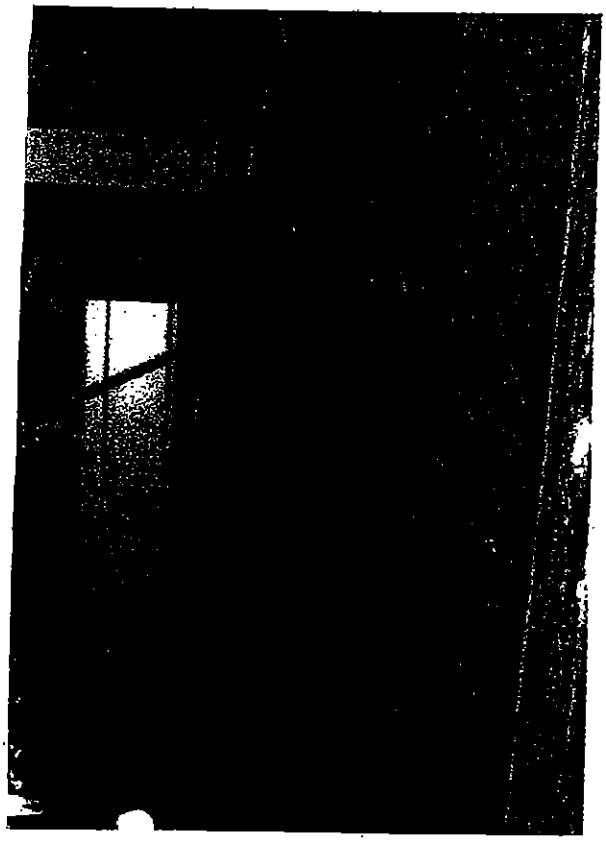
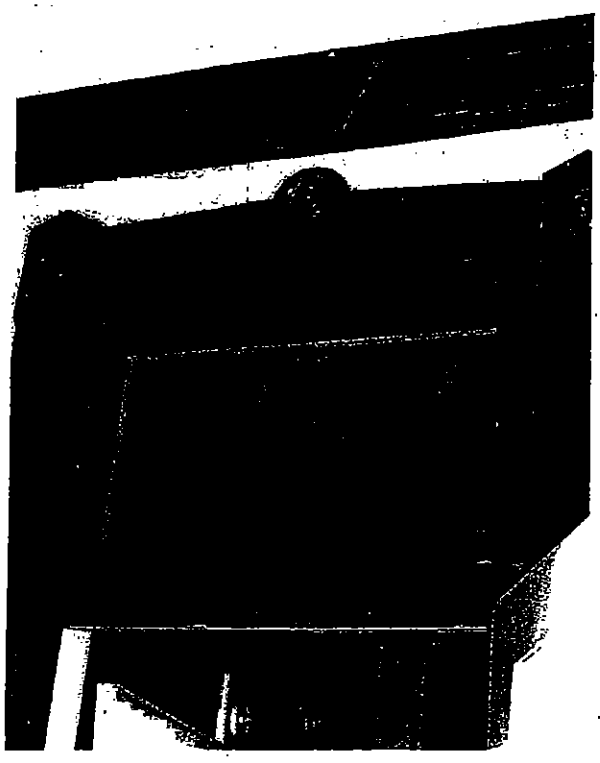
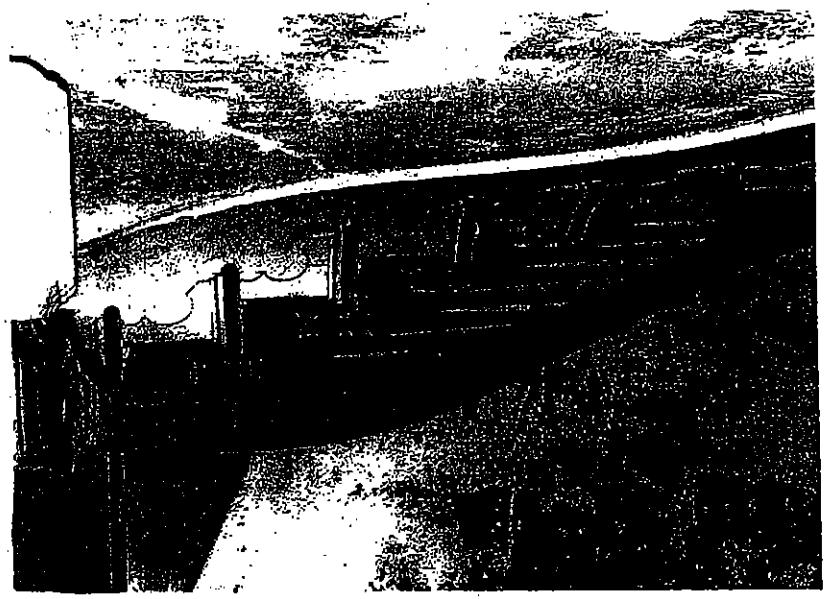
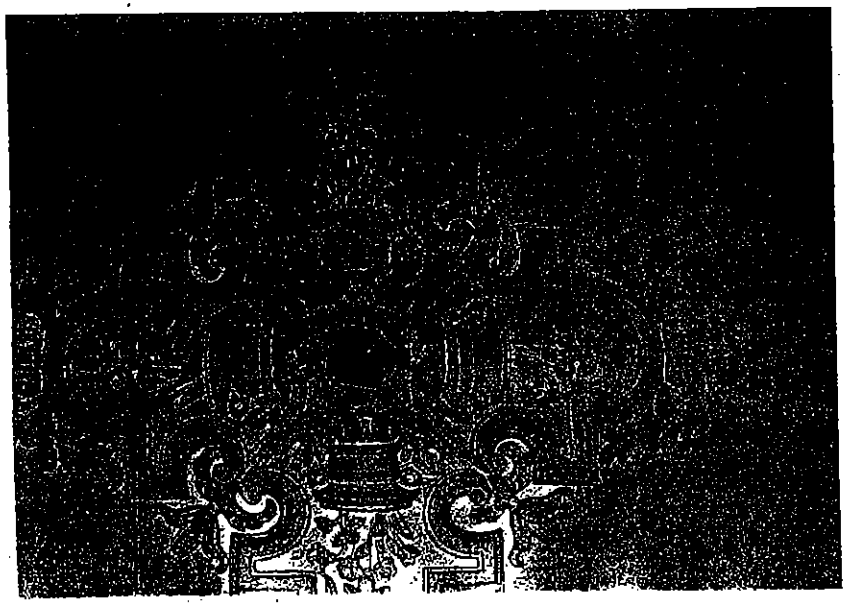








1876 1876-83 100

Used to Build Home 63 Years Ago

By EDDIE THROM.

Mr. Rinker [illegible] part of the Marion county Courthouse is 50 miles from the building's site—masked as a 36-room farmhouse two miles south of Valley Mills.

At least, materials of the 63-year-old house were intended for the present Courthouse, completed in 1878 after six years of construction work.

Old-time residents of Valley Mills explain that the contractor for the Marion county Courthouse, David Nicholson, had a small house and farm near the community.

Each evening, after work, Mr. Nicholson would drive home in a spring wagon, which creaked with stone, lumber and other materials gathered from the Courthouse construction supplies.

[illegible]

At the Courthouse slowly rose to completion, the new Nicholson homestead 20 miles away also went up, and the two structures were completed simultaneously, it is recalled. Mr. Nicholson helped several workers in the building of his house.

Solidly constructed of yellow popular and stone, with a slate roof, the old house shows little signs of wear. All interior woodwork and staircases are of black walnut, as in the Courthouse. Ceiling decorations are of the same rococo design as found on the ceilings of the public building. Tile floors in the hall and living room are the same as to be found in the Courthouse.

Traded House for Hotel.

Six rooms are on the first floor and six on the second floor. The full brick basement has 12 rooms.

Valley Mills residents recall that Mr. Nicholson, although building the house for a family homestead, lived in it only a few years before he and his wife were divorced. Then he traded the house for the old Rhodius Hotel then located on Monument circle.

Wymond J. Beckett, 22 east 32d street, Indianapolis attorney, is present owner of the home and has held title for 30 years. Before that, Mr. Beckett said, the house changed hands frequently. W. H. H. Miller, former United States attorney general under President Harrison, was one of the tenants.

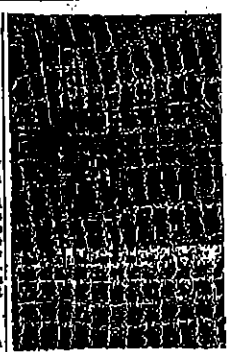
Basement Biggest Bother.

The family of David Burger, an employe on the dairy farm which Mr. Beckett operates, now lives in the home.

"That basement caused me a lot of trouble when I was renting the house during prohibition days," Mr. Beckett recalls. "I had to quit renting it after three tenants turned out to be bootleggers."

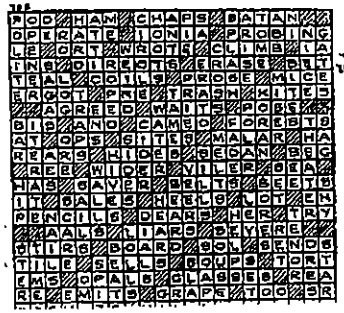
Mr. and Mrs. Frank Copeland of Valley Mills lived in the house around the turn of the century, 1899 to 1904. "That fine old sugar tree in the front yard (now about five feet in diameter) was only a switch then," Mr. Copeland recalls.

Built with identical materials, this 36-room farmhouse (above) south of Valley Mills rose simultaneously with construction of the Marion county Courthouse. Both were completed in 1878. (Below) walnut staircase and woodwork are features of the house built by David Nicholson, general contractor for the Marion county Courthouse.



ANSWER TO CROSSWORD PUZZLE.

Solution to Puzzle No. 768, Published on Another Page of The Star today.



Mailmen Swap Jobs, Homes for Children's Sake

Loyal M. Smith, Onslow (Ia.) rural mail carrier and R. W. McPhillips, El Paso, Tex., city mailman, have traded jobs, homes and furniture because their children needed a change in climate.

Smith started it with a swap notice. McPhillips saw it and agreed. Smith threw in his car.

Women and Crime.

Women take up crime less for gain than for attention, says Lotus H. Loudon, chairman of the California institution for women. He finds most of the women in the state prison at Tehachapi were in-

PRELIMINARY HISTORIC: BUILDING, STRUCTURE, SITE, DISTRICT, AND OBJECT DATA SHEET
MARION COUNTY CITY-WIDE SURVEY, PREPARED BY THE INDIANAPOLIS HISTORIC PRESERVATION
NUMBER 1860 CITY-COUNTY BUILDING, INDIANAPOLIS, INDIANA, 46204 OUR TELEPHONE NUM

FILE NO. ____ PLAT ____ LOT ____ LUS ____

ADDRESS 6510 MAUN ROAD

OWNER 862-6921 IVAN CLAPP 1985 Estate landowner

PRESENT USE:
1 fam X RENTS? 2 fam ____ multi ____
pub ____ comm ____ indus ____
rell ____ agr ____ mixed ____
other ____

NEIGHBORHOOD LAND USE:
res X comm ____ indus ____
pub ____ agr X woods ____
other ____

PERIOD/STYLE: P C F GR SV LV ET MT LT
Other: Ca 1855

DESCRIPTION: Stories 2 1/2
Roof: gable (flank ____ end ____ cross X
Gambrel (flank ____ end ____ cross ____) Hip ____
Monitor ____ mansard ____ flat ____ shed ____
other ____

WALLS: clapboard X brick ____ stone ____
Shingle: asb. ____ ashp. ____ wood ____ curtain wall ____
Modern Comp. ____ other ____

FOUNDATION: height ____ stone ____ brick X conc. ____
Stucco ____ Conc. Block ____ Other ____

ALTERATIONS: none ____ minor X major ____ moderate ____
Rare bldg. X Typical of its area NO WAY

COMMENTS:
MOST UNUSUAL STRUCTURE IN SOUTH COUNTY to date
IMAGE early Italianate ornate
Porch
Unique Multiple Windows
ENTRANCE PORCH

SURVEYOR JR AV Checked
SUPERVISOR HV Checked
DATE: 18 MAY 77

contact sheet photo(s)

NEGATIVE NO. 1-A-10-A

KNOWN AS ____

ARCHITECT ____

DATE & SOURCES ____

ORIGINAL USE ____

ORIGINAL OWNER ____

HISTORY & SOURCES:
building has all finials
highway rods, - all ~~shutters~~ blinds
98% all original detail remains

EVALUATION: Physical condition of:
structure (5) 3 2 0
grounds (2) 1 0
neighborhood (2) 2 0

Architectural value
(3) 30 20 10 0

Visual importance to neighborhood
(2) 10 5 0

Historical value
(38) 30 20 10 0

TOTAL SCORE

Marion County ____ Maun Rd ____ ROAD

MAP NO. ____

PRIORITY ____

A. ADDRESS 6510 Maun Road B. STRUCTURE ____ C. SITE ____ D. NHL ____ E. NR ____ F. HABS ____ G. NAER ____ H. TOWN/CITY Indianapolis I. UTM References ____ J. QUAD SHEET ____

STATE OF INDIANA
DEPARTMENT OF NATURAL RESOURCES
INDIANA HISTORIC SITES AND STRUCTURES INVENTORY

IDENTIFICATION

1. HISTORIC NAME ____
2. OWNERSHIP: ____ PUBLIC ✓ PRIVATE
NAME ____
ADDRESS ____
3. LOCATION NOTES ____
4. VISIBLE FROM PUBLIC RIGHT OF WAY: ✓ YES ____ NO

SITE PLAN

CLASSIFICATION/DATE

5. USE — PRESENT / PAST
Residential (sing.) ☐ ☐
Residential (mult.) ☐ ☐
Commerce ☐ ☐
Industrial ☐ ☐
Agriculture ☐ ☐
Transportation ☐ ☐
Organization ☐ ☐
Military ☐ ☐
Political ☐ ☐
Unknown ☐ ☐
Vacant ☐ ☐
Other ____ ☐ ☐

6. CATEGORY
____ DISTRICT
✓ BUILDING(S)
____ STRUCTURE
____ SITE
____ OBJECT

7. ACCESSIBLE
✓ YES/RESTRICTED
____ YES/UNRESTRICTED
____ NO

8. ENDANGERED
✓ NO
____ YES/BY WHAT ____

9. DATE c 1870-75
10. ARCHITECT/BUILDER ____

SIGNIFICANCE

11. PERIODS: ____ PREHISTORIC ____ 17TH/18TH CEN. ____ 1800-1860 ✓ 1861-1899 ____ 1900-PRESENT

12. AREAS OF SIGNIFICANCE
____ Archeology-Prehistoric
____ Archeology-Historic
____ Agriculture
✓ Architecture
____ Art
____ Commerce
____ Communications
____ Community Planning
____ Conservation
____ Economics
____ Education
____ Engineering
____ Exploration/Settlement
____ Industry
____ Invention
____ Landscape Architecture
____ Law
____ Literature
____ Military
____ Music
____ Philosophy
____ Politics/Government
____ Religion
____ Science
____ Sculpture
____ Social/Humanitarian
____ Theater
____ Transportation
____ Other (Specify)

DESCRIPTION

13. STYLE
____ Federal
____ Greek Revival
____ Gothic Revival
____ Italianate
____ Second Empire
✓ Stick Style/Eastlake
____ Queen Anne
____ Romanesque Revival
____ Colonial Revival
____ Neo-Classical
____ Bungalow
____ Vernacular
____ Other (Specify) ____

14. CONDITION
✓ EXCELLENT
____ GOOD
____ FAIR
____ DETERIORATED
____ RUINS
____ UNEXPOSED

15. ALTERATIONS
✓ UNALTERED
____ MINOR
____ MAJOR

16. SITE INTEGRITY
✓ ORIGINAL SITE
____ MOVED DATE ____

17. OUTBUILDINGS/SECONDARY STRUCTURES
✓ NO
____ YES ____

18. IN ESTABLISHED HISTORIC DISTRICT
✓ NO
____ YES/NAME ____

19. DESCRIPTION OF ENVIRONMENT (NATURAL AND MAN-MADE) Unusual stick style house with unique details; shutters, wrisout surrounds, shutters and dormers all remain

20. INFORMATION SOURCES ____

21. PREPARED BY Michael B. Cohen 22. DATE 7.5.77

PURDUE 08/21/2002 09:13 7554961755

PURDUE 08/21/2002 09:13 7554961755

PAGE 02 PURDUE 08/21/2002 09:13 7654961755

1. Rating: ☑ Outstanding ☐ Significant / Notable ☐ Contributing	2. County: Marion	3. Survey No.: 097392-80118
4. Historic Name: ~~Wayne Newton~~ House	5. Township: Decatur	Preliminary No.: 83124 (109)
6. Address: 6510 S. Mann Rd	7. City: Indpls.	8. Quad Name: Maywood

INDIANA HISTORIC SITES AND STRUCTURES INVENTORY State of Indiana Department of Natural Resources State Form 10022 (Revised 1988)

[redacted]

9. Common Name: ☑ Yes ☐ No ☐ Yes ☑ No

12. Ownership: ☐ Public ☑ Private	Owner's Address (if different): Paul Ferdinand				
13. Use: Present / Past — Residence ☑ ☑; Commercial ☐ ☐; ☐ ☐; ☐ ☐	14. Category: ☑ Building(s) ☐ District ☐ Site ☐ Structure ☐ Object	15. Surveys / Legal Protections	16. Location Notes / Legal Description: at Mills and Mann Rd.	17. Condition: ☐ Excellent ☐ Good ☑ Fair ☐ Deteriorated ☐ Ruins	18. Building Integrity: ☑ Unaltered ☐ Altered ☐ Moved; Date Building was moved
19. Time Period(s) (Dates): C1886	20. Style(s): Gothic Revival		21. Architect / Builder: Martindale		

22. SPECIFY ALTERATIONS

Removals	Replacement	Additions	Other
– 2 [illegible] gazebo, round barn		bay window?	

23. DESCRIPTION

Stories: one and a half

Plan: irregular

Foundation: brick

Walls: clapboard

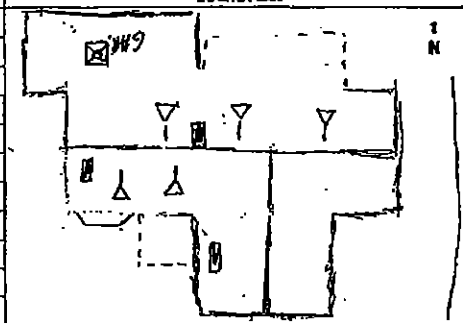
Roof: gabled - med. pitch - crested

Porches: back enclosed porch

Openings: double inch windows, gabled dormers, fit balcony, bay window

Grounds / Outbuildings: carriage house - dot.

24. SITE PLAN



26. Areas of Significance:

- ☐ Agriculture
- ☑ Architecture
- ☐ Art
- ☐ Commerce
- ☐ Communications
- ☐ Community Planning
- ☐ Conservation
- ☐ Economics
- ☐ Education
- ☐ Engineering
- ☐ Entertainment / recreation
- ☐ Ethnic heritage
- ☐ Exploration / settlement
- ☐ Health / medicine
- ☐ Indian
- ☐ Industry
- ☐ Invention
- ☐ Landscape architecture
- ☐ Law
- ☐ Literature
- ☐ Military
- ☐ Performing arts
- ☐ Philosophy
- ☐ Politics / government
- ☐ Religion
- ☐ Science
- ☐ Social history
- ☐ Transportation
- ☐ Vernacular / Construction
- ☐ Other _____

?

Statement of Significance / Additional Description:

ATTACH NEG[illegible] ENVELOPE

Used as underground railroad, built by Martindale, the same architect who built our State Capitol, and the demolished Court House; many materials used were left over from the State Capitol.

Grounds once had round barn

This is probably the finest house still standing in Decatur township

☐ SEE CONTINUATION SHEET

28. FOR STATE OFFICE USE ONLY

NR _____

SR _____

E _____

NE _____

33. UTM Reference

30. Information Sources

[illegible]

31. Surveyor: Brent Hessong	Affiliation: H.L.F.I.	Date: Aug. 87
32. Revised by	Affiliation	Date

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Chris Sturbaum
334 South Jackson St.
Bloomington IN
47403

To: the Hoosier Environmental Council

Subject Commentary on I-69

As a member of the local historic preservation commission, I am dismayed at the loss of historic structures and landscapes in Monroe and the other counties in Alternative 3B. This segment of Monroe County contains both quarries and farmsteads of surprising age and integrity. It also contains a portion of the Maple Grove Road Historic District (NR), a very large rural historic district already listed on the National Register. There are potential rural districts and eligible historic sites which will be destroyed, not to mention farms and houses not reaching these survey criteria, but locally important in their own right. This survey does not mention rural graveyards but it has been reported that several will be moved to make way for the route. Judging from the damage to my own county, I can imagine only too well the similar impact on historic sites in the other involved counties. 5.13

My personal business is in restoration of historic structures and it happens that one of these projects, which was featured in Washington DC last year where my company participated in the Smithsonian's Folklife Festival, is directly in the path of Route 3B. Personal knowledge of this particular property has caused me to reflect on how many more such treasures of the past are to be lost. I have reviewed the publication which lists the historic properties and that knowledge, added to my personal awareness of friends who will lose their country home and farm, makes me against all but the "no new terrain route".

I endorse the "No New Terrain Route 70/41" in order to minimize the negative historic impact on our own county and the other regions similarly effected. Please save the state money and preserve our heritage at the same time. No new terrain please!!!!!!

Signed

Chris Sturbaum

Owner / Golden Hands Construction
Bloomington Historic Commission Member
Bloomington Restorations Incorporated Executive Committee Member

1107-682

Stark House
1870s
Monroe County

I-69 HOTLINE COMMENTS

11/7/02 My name is Sharon McCane. I live in Monroe County and we've been honored to have Indiana's first and only rural historic district. I'm concerned about the potential adverse a major truck route would have on our Maple Grove rural historic district. If the chosen alternative comes through Monroe County, even thought the alternative may not technically be traversing the district , he I69 pathway appears to be less than one mile from much of the district and 1/4 to 1/2 mile from the southern end of the rural historic district. And I'm worried that introduction of the incompatible visual, atmospheric, or audible elements would change the integrity of the district. (indecipherable)..regarding the potential indirect effect and how would this effect our national register standing. I also don't believe that we Monroe county really needs the interstate. I think we're well served by I69 and have more of a problem going east and west than north and south and I can only envision more problems should it come down through Monroe County. I also am opposed any of the new terrain highways and I would favor the US 41/I70. Again my name is Sharon McCane, I live on North Maple Grove Rd., my phone number is 812 876-2187. Thank you. 5.13

1107-634 McCane, Sharon.wpd

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

To destroy an industry, and does you are considering improving economic conditions inmared, shows a majority that you are only concerned with doing things your way and you will not change your mind. If 41/170 is not chosen, farms will be destroyed, limestone will be useless for miles. The limestone has been quarried since 1827. The state of Indiana has had an industry which built the Empire State building in New York, repaired the Pentagon after an attempt to destroy it. In fact, all over the world we have exported stone to other countries. Hundreds of Hoosiers are provided with jobs from the quarrying of limestone. A highway gas-stop is not a life career. According to Todd Stockwell it would take another 1,000 years of excavation to be used. To end this guarantee of jobs in southern Indiana is reprehensible. In a democracy minds must change when people have shown their interest in how to use land correctly article enclosed 5.14

1025-031

Name Gary Anderson

Address 131 N. Jefferson

City/State/Zip Bloomington, IN 47408

RECEIVED
OCT 25 2002
SLA

J. Bryan Nicol
Indiana Department of Transportation
100 N. Senate Ave.
Indianapolis, Indiana 46202

Mr. Nicol:

I have sent this letter on behalf of a group of citizens who live near Elwren, Indiana and who have taken interest in the I-69:Evansville to Indianapolis Tier 1 Draft Environmental Impact Study (DEIS) & Section 4(f) Evaluation of JULY 22, 2002 (EIS# FHSA-IN-EIS-02-01-D) and signed by J. Bryan Nicol and John R. Baxter. We understand that you are one of the government officials with the authority to decide which of twelve I-69 alternatives will be selected for Tier 2 study.

We have provided this letter and associated detail information to ensure that you are aware of the serious public concern with the poor quality of data that this report is based on and with the public dissatisfaction in the study's assessment of "preferred routes" for Tier 2 evaluation. While the Tier 1/Tier 2 definition appears to be a logical approach to handling the dilemma of "exactly how detailed of data to consider" in down selecting from twelve routes to one – the selection of a single route for further consideration is a very serious concern to the many thousands of citizens impacted by those routes and their local economies. The public will not accept this selection if it is based on grossly inaccurate, incomplete and ill communicated information. Nor will we be easily pacified by a lengthy study with pretty pictures or with the promise of quality Tier 2 work.

This DEIS is overly superficial in it's assessment of environmental impact, it insufficiently defends the imaginary economic benefits that I-69 will result in, and it provides absolutely no basis for comparing the relative value of environmental impact (and cost) to any other considerations.

This letter and data are being copied to a wide variety of citizens action and watchdog groups and public agencies with interest in various environmental, fiscal, and legal aspects of the DEIS study who will be solicited for assistance in ensuring that these issues (and many others that we could not fully address in the available timeframe for public comment) are responsibly addressed by INDOT in this process.

Any questions or responses related to this letter can be directed to:

Mr. Gary Milhoan, R.R. 3 Box 480, Solsberry, Indiana 47459

1106-140

Executive Summary:

A group of interested citizens has spent considerable time understanding this report and assessing the quality of some of the data. This executive summary will briefly state the major issues with no elaboration and the detail will be provided later in the document.

1. The DEIS study does not effectively address environmental impacts as the title of the study suggests and its conclusions are confused with other objectives.
   a. The study is flawed on a macroscopic level. The summary pages S-21, S-22, and Table data on S-24 very clearly specify that Alternative 1 is the logical choice from an environmental impact perspective, yet the "environmental impact" study doesn't recommend this route. 6.2
   b. Environmental impact and cost are obviously given very little weighting in the recommendations at all since Alternative 1 is not among the "preferred routes". 6.2
   c. The study is seriously superficial on a microscopic level, as it vastly underestimates the actual environmental impacts and is based on only the most rudimentary information despite the claim on page S-6 that "extensive field visits" were made. More detailed knowledge of the Karst character of the Alternative 3 route will certainly increase even the high cost estimates for all three routes of Alternative 3 substantially.
2. The study does not adequately address impact to the federally protected Indiana Bat if Alternative 3 is chosen. The DEIS study lists only the most superficial data on their known hibernaculum and includes absolutely no assessment of the impact of the substantial loss of critical habitat (to breeding, feeding, and living within a reasonable range of their hibernating areas). This has been communicated to INDOT by USFWS but seems to be categorically ignored in the DEIS. 5.17
3. Karst feature topology impact is dramatically understated for Alternative 3. Again, the study is based on only the most superficial data and it is apparent that no "extensive field studies" were performed as the study claims. This could result in huge cost increases for specialized filtration systems to avoid environmental damage (similar to the Mitchell plain fiasco on Route 37 a few years ago). Substantiation of additional Karst features in a very small area of Alternative 3 (A&B) is included with this letter. Nearly two dozen additional undocumented caves have been identified (by this citizen's group) within the two mile study band of Alternative 3 (A, B, and C) but have not yet been documented by the Indiana Geological Survey or explored for Indiana Bat hibernaculum by USFWS. This is from a few dozen properties out of several hundred in this small area alone. 5.24
4. Alternative 3 (A&B) go right through the Westinghouse property off route 48 (near Bloomington) – which is well known to be contaminated with PCBs. There is no description in the DEIS of special needs or treatment for preventing the spread of these PCBs to nearby areas. This also raises the concern that the cost estimates for Alternative 3 are overly conservative. 5.16

Background Information on KARST:

A group of citizens along Alternative 3 became aware of the DEIS study and spent time to understand the detail contained therein. Several concerns arose quickly from an understanding of the study:

- There was no apparent concerted effort by INDOT to contact landowners along the route, raising suspicion of the true intents of this study and the INDOT decision process. In all discussions to date, we have found no landowner who was contacted by anyone for field studies of their properties.
- Alternative 1 is cheapest, least environmentally damaging and not included among the preferred routes. No need to substantiate this obvious fact that the DEIS study completely supports.
- The DEIS study does not define any weighting for factors considered in recommending preferred alternatives. 6.2
- Alternative 3 is listed among the preferred routes and unnecessarily dissects a very fragile Karst area with a substantial population of the federally endangered Indiana Bat. The Karst information in the DEIS study considerably underestimates the actual concentration of features within the 2 mile study area of Alternative 3.

This citizens group recognized (based on knowledge of the area) that the DEIS study is based on insufficient knowledge of the actual Karst features along Alternative 3.

- Studying the map of Karst feature concentration (ATLAS, Alternative 3, Page 7 of the DEIS study) reveals that it is based only on the existing superficial data provided by the Indiana Geological Survey. This same information (for Greene and Monroe counties) is provided as Appendix 1 of this letter. 5.24
- Far more Karst features exist in the proposed two mile corridor of Alternative 3 than the DEIS data would suggest.
- The entire Karst region could have been avoided by keeping Alternative 3 slightly further West.

County plattes were assembled and overlayed with IGS cave data and the two mile corridor to ascertain whether the known Karst features were indeed overlooked by the DEIS study, and it was quite apparent that the study underestimates the features within the chosen two mile corridor. This group also determined that no landowners in this area have been contacted by anyone for any field studies (and we have surveyed many landowners within the two mile corridor).

To provide credible evidence of the inadequacy of this study in assessing true environmental impact, we established a small study group of properties spanning the two mile study band along Alternative 3 (A&B). We plotted plattes, overlaid the Alternative 3 route, obtained from the Indiana Geological Survey the same source data (Appendix 1) that was provided to INDOT for this study, and plotted all known caves on the maps. Then we contacted landowners in this small band to ascertain whether there are indeed Karst features on their properties that are not included in the source data. We couldn't correlate this data to the study exactly because the study doesn't include detailed data on Karst. Interestingly enough, these landowners were overwhelming happy to help us in this endeavor (as they are very concerned that Alternative 3 represents real and significant environmental damage to their properties). To no great surprise, this small effort revealed a tremendous number of undocumented Karst features situated exactly within the two-mile band that the study preparers have purportedly "field verified (extensively)" already.

We contacted the Indiana Geological Survey, who provided assistance to us in locating, classifying, characterizing, and documenting a number of these features. There was not sufficient time to explore many properties (a couple dozen out of hundreds within the Karst area) but the documentation of some of the additional features is included as Appendix 2. Many other Karst features have been communicated as word of this effort spread – including two long undocumented caves that may completely traverse the Alternative 3C route and have powerful year round water flow. Over a dozen additional property owners have stepped forward with information on undocumented caves within the proposed two mile study band of Alternative 3 – but time has not allowed detailed substantiation for this letter. Many of these property owners also have substantial evidence on the use of their properties by Indiana Bats which depend upon this rare and fragile rural Karst region for their diminishing existence.

Appendix 3 is a report on the Significance of Karst Features in Eastern Greene and Western Monroe Counties as written by Mr. Sam Freshour – a local cave expert.

Background Information on the Indiana Bat:

The Indiana Bat is a federally endangered and protected species which resides in the exact area that Alternative 3 would be dissecting and damaging. While the DEIS study gives lip service to this issue (chapter 5.17 and the map of ATLAS, Alternative 3, page 9), there is no actual study of even the direct impact of eliminating multiple hibernaculums of these rare creatures let alone the very definite impact of eliminating feeding grounds and dissecting and diminishing the exact home range habitat that they breed in. 5.17

No doubt there will be attempts to hide behind the "Tier 1" nature of this study and conversation about how the real details are going to be dealt with in Tier 2. That approach is not very convincing considering the well known existence of these bats in this area and the well documented need to protect their habitat and the fact that the stated objective of this study is to have sufficient detail to decide on one single alternative.

A quick look at the map included in the DEIS study reveals that there are only 49 known hibernaculums in the study area of Alternative 3. Yet four of these are directly within the two mile corridor of Alternative 3. Even more significant is that as many as 21 out of the 49 are within about 5 miles of Alternative 3. Why did the DEIS study not address these facts or assess the impact of elimination of this rare and significant bat range to the rapidly declining total population of this federally protected species?

"The present total population of this endangered species is fewer than 360,000, with more than 85 percent hibernating at only nine locations, making them extremely vulnerable to destruction. "Harvey, M.J., J.S. Altenbach, and T.L. Best. 1999. Bats of the United States. Little Rock: Arkansas Game and Fish Commission.

To elaborate a little further on the likelihood of severe damage to the Indiana Bat, one must consider the reality of what is readily available information. The very abundant caves of western Monroe County are very well known and very well documented. These caves were "opened up" over years and years (4 decades at least) with different groups of cavers working to dig out new sections of caves. Now that so many people have spent so much time "opening up" these caves – now we can walk in and observe the Indiana Bat hibernaculums that have probably been there for a long time. There are nearly as many caves in the area of Eastern Greene County that Alternative 3 would dissect but these caves are on private property and have not been made accessible to the public. However, bats do not need the same size openings that people do. There are roughly 21 known (current or historical) hibernaculums for the federally protected Indiana Bats in the immediate area that Alternative 3 would destroy. There is little doubt that there are additional hibernaculums that are currently unknown that will be destroyed if Alternative 3 becomes reality. One neighbor on the route has a small cave on his property that he has seen bats flying into and out of. He does not want to make his cave known for liability purposes. What a shame that he may be forced to exploit his property to save it from being exploited by INDOT. Dozens of property owners in this area have indicated that they have trees and "holes" that are used as summer homes for Indiana Bats. While some of these may not be Indiana Bats – we will be providing additional "ground level" assistance to ensure that the USFWS and other bat experts have access to these locations to distinguish the density of actual Indiana Bat presence. We'll also be working to ensure that some actual assessment is performed to determine the impact (on the remaining Indiana Bats) of destroying this rare habitat.

Alternative 3 (A&B) happen to go right through the Westinghouse property off Route 48 and Oard Road (near Bloomington). This is potentially a very serious environmental concern that doesn't even appear to be addressed in the DEIS at all. This property is known to be contaminated with PCBs and resides very near the Neal landfill which is "capped" to prevent further leakage of PCB effluents. There should be a substantial description in the DEIS of the engineering requirements that would be necessary to prevent any worsening of the PCB contamination in this area – if the soil must be disturbed to build I-69. This would also need to be included in the cost estimates for Alternative 3 as I am sure that there would be significant costs involved in any environmentally conscious approach to disturbing this property. 5.16

The Nature Conservancy
INDIANA CHAPTER
Saving the Last Great Places

1505 N. Delaware Street, Suite 200
Indianapolis, Indiana 46202

tel 317 951-8818
fax 317 917-2478

Worldwide Office
Arlington, Virginia
tel 703 841-5300

nature.org

October 31, 2002

Mr. Lyle Sadler, Project Manager
Indiana Department of Transportation
100 N. Senate Avenue, Room N855
Indianapolis, IN 46204-2218

Dear Mr. Sadler:

Thank you for the opportunity to provide comments on the I-69 Evansville to Indianapolis Tier 1 Draft Environmental Impact Statement. We have serious concerns about the impacts of some of the proposed routes on important environmental resources in southern Indiana.

Our first concern is our lack of involvement in the planning process until this point. Previously, we were contacted in 1991 by the D.E. McGillem and Associates previous consultants on the I-69 extension project and asked for our input on the then-proposed routes since one of the routes came in close proximity to the Conservancy's Thousand Acre Woods Nature Preserve in Daviess County. We responded with our concerns regarding impacts to that nature preserve, as well as to other threatened natural areas in Daviess County. Our letter of December 26, 1991 is enclosed.

Since providing that letter, we have not been contacted regarding the I-69 project. Our Director of Stewardship, Ellen Jacquart, attended the public hearing in Bloomington on July 20 and spoke with consultant staff about our concerns. She left a written letter and business card asking the consultants to contact us so we could meet and discuss our concerns. There has been no contact by the consultants.

We were also interested to note that there was a bus trip on June 4 and 5 attended by a number of agencies and land managers affected by the proposed routes. It appears it was a very useful and significant trip, as it resulted in dropping from preferred status some alternatives that adversely affected Bean Blossom Bottoms Nature Preserve (Sycamore Land Trust) and Tincher Hollow Special Area (U.S. Forest Service). We cannot help but wonder why we, as the owner of a state-dedicated nature preserve affected by a proposed route, were not invited on this trip. We also wonder that, if we were on the trip and had had the same opportunity to air our concerns that Sycamore Land Trust and the U.S. Forest Service did, whether routes would have been dropped or revised to address our concerns. The attendee list on this trip appears to be more than simply "environmental resource agencies listed in the Procedural Manual for Preparing Environmental Studies" (pg. 11-12, DEIS). We would appreciate an explanation of how attendees were chosen for this trip.

1031-016

When we requested and received the Tier 1 DEIS we were surprised to learn that some of the preferred routes (routes 3A, 3B, 3C, 4A, 4B, and 4C) are in close proximity to Thousand Acre Woods Nature Preserve, despite our earlier concerns and comments. We were also concerned that nowhere in the DEIS does it note that this area is, in fact, a state-dedicated nature preserve. It was dedicated in July 2000 by the Natural Resources Commission with the articles of dedication subsequently signed by the governor. 5.23

We continue to have the same concerns regarding impacts to Thousand Acre Woods Nature Preserve that we did in our original letter. The proximity of the road has the potential to increase noise, salt runoff, and oil and fuel spills at the preserve. Road construction has the potential to change the hydrology of this area, and thus adversely impact the forested wetlands of the preserve. Additionally, disturbance from construction activity will likely increase the invasion of exotic plant species into this natural community, both by species already in the area that take advantage of newly disturbed ground and by the invasive species that INDOT actually plants on roadsides. We own several nature preserves bordered by highways managed by INDOT, and are very disturbed by INDOT's practice of planting known invasive species such as crown vetch and tall fescue directly adjacent to high quality natural areas. INDOT should try and avoid negative environmental impacts to the greatest extent possible, and should avoid planting problem invasive species. 5.23

Our other concerns regarding the I-69 extension deal with the effects of routes 2, 3, 4, and 5 (all variations) relative to cumulative impacts on forest interior habitat and forest fragmentation. Most of the forest interior habitat in Indiana is found in the southern portion of the state, and this rapidly decreasing habitat provides habitat for many declining bird species, including ovenbirds, wood thrush, and cerulean warblers. The increased fragmentation of interior forest caused by the I-69 will likely cause lowered reproductive success of these species due to higher parasitism and predation rates. Associated development following the development of the highway will increase these cumulative negative impacts on forest interior habitats.

Cumulative impacts to forest interior habitat will also threaten Indiana's bobcat population. The forests of southern Indiana, and Owen County forests in particular, are known to support these secretive and wide-ranging species. Another species of concern which could be adversely affected by construction of the highway through forest blocks is the bobcat. A few years ago, the Non-game Section of the Division of Fish and Wildlife began studying the bobcat population of southern Indiana. According to Scott Johnson, non-game biologist, at this time they have trapped 21 different cats and radio-tagged 19 of those (Scott Johnson, personal communication). Those 19 cats have been followed over time to learn as much as possible about this secretive species. Since the start of the project, 5 radio-tagged bobcats have died - four were struck by cars while trying to cross roads. It seems apparent that adding an interstate in this area, will decrease available habitat for this rare cat, create a formidable barrier for dispersing cats, and create additional mortality from vehicles. Given our poor understanding of the bobcat's ecology, habitat requirements and total population size, we believe that the additional negative stress of the new all terrain route could contribute to the species demise in Indiana. 5.17 5.17

Fragmentation of interior forest blocks also greatly increases the threat of invasive plant species introduction into the forest, including garlic mustard, Japanese stilt grass, dame's rocket, multiflora rose, privet, and a wide variety of other invasive species. These invasive species further degrade the remaining forest habitat by eliminating native plant species, and thus the food and cover necessary for native wildlife species. Again, this problem is exacerbated by INDOT's habit of planting invasive species along highway rights-of-way. 5.21

For the above reasons, we urge you to seriously consider the environmental impacts of new terrain routes for I-69. Cumulative impacts to forest interior habitat and additional impacts to these habitats from associated developments along the interstate highway will have a lasting negative impact on Indiana's natural heritage and natural resources. We believe that the environmental concerns we have raised are best mitigated through avoidance and hope that you will give our concerns serious consideration. As your Tier I Draft Environmental Impact Statement clearly states, Alternative I has almost no additional negative impacts on our State's natural resources. We feel strongly that Alternative 1 is the best route for the future of Indiana's environment, and we urge you to reconsider this route as a viable alternative.

We would be pleased to discuss our comments further should you have questions.

Sincerely,

Mary McConnell
State Director

cc: Michael Grovak, Bernardin, Lochmueller & Associates

THE NATURE CONSERVANCY
INDIANA FIELD OFFICE

1330 West 38th Street
Indianapolis, IN 46208
317-923-7547

The Nature Conservancy

December 26, 1991

Robert E. Hittle
D. E. McGillem & Associates, Inc.
77 South Girls School Road, Suite 101
Indianapolis, IN 46231

Dear Mr. Hittle,

Thank you for the opportunity to respond to the proposed Southwest Indiana Highway Corridor.

The Nature Conservancy is an international, membership organization committed to the preservation of natural diversity. Our global mission is to preserve plants, animals, and natural communities that represent the diversity of life by protecting the land and water they need to survive. The Nature Conservancy's Indiana Chapter is responsible for that mission in Indiana. Since 1959, the Indiana Chapter has protected part or all of 120 natural areas totaling 18,200 acres. In addition, we have identified and worked with landowners at over 400 sites that feature rare plant and important natural areas. We call these sites "registry" areas.

The proposed routes for the Southwest Indiana Highway Corridor through Daviess County pose substantial environmental threats to several natural areas, of primary importance is the Thousand Acre Woods Nature Preserve in R7W, T2N, Sections 1 and 2, R7W, T4N, Section 36, R6W, T4N, Section 31 and 29, and R6W, T3N, Section 6 (See attached map). This large woodland features a mosaic of high-quality forest communities composed of wet floodplain forest, wet-mesic floodplain forest, and bluegrass tillplain flatwoods. These forest communities are all globally significant and considered "threatened" in Indiana. The proposed route A4 would come within 100 yards of the western forty acre tract of 1000 Acre Woods. The noise, exhaust, and salt may pose serious problems to this important preserve and the animals and plants that is supports.

The other threatened properties in Daviess County are "registry sites." These areas have been identified by the biologists of the Indiana Natural Heritage Program as containing rare and endangered species or unique natural communities. The Nature Conservancy has registered or made agreements with the landowners where they voluntarily protect these sites.

THE NATURE CONSERVANCY
INDIANA FIELD OFFICE

Registry site #328, Section 35 Sand Woods, (R7W, T4N, Section 35, South half of SE 1/4 of SE 1/4) features an old growth dry-mesic sand forest and sand flatwoods. These communities are globally significant and rare in the State of Indiana. Proposed route A4 passes to the west of this tract. The noise, exhaust, and salt may present hazards to the long term integrity of this site.

Registry Site #186, Badger Badlands is just east of Plainville (R7W, T4N, Section 1, north 1/2 of the SE 1/4). This site has several active badger dens. Proposed route A3/B3 passes through the western part of this property. The construction and use of this highway will probably imperil this population of rare mammals.

Another noteworthy natural area, which has recently been discovered is in R7W, T4N, Section 34. This site is classified as a "sand barrens" which is globally significant and state rare. Sand barrens are open communities with short, gnarled trees, shrub thickets, and grassy openings. Herbaceous vegetation is usually sparse, and less than one meter tall. Sand barrens occur on ridges and well-drained sites in areas of aeolian sand dunes surrounded by bottomland. There are few remaining examples of this community in Indiana, as most of the land on which it occurred is under cultivation for melons. Proposed route B4 passes through and would seriously endanger this unique area.

The Nature Conservancy recommends that the routing for the proposed highway avoid all these sites. To avoid Badger Badlands the road could go west of Plainville or farther to the east. To avoid 1000 Acre Woods, Section 35 Sand Woods, and the sand barrens, the road could be closer to the present State Road 57 or several miles to the west so that it travels along the White River floodplain.

In conclusion, the proposed routes for the Southwest Indiana Highway Corridor through Daviess County pose serious threats to significant natural areas, including The Nature Conservancy's Thousand Acre Woods Nature Preserve. The routes should be adjusted to avoid all these areas.

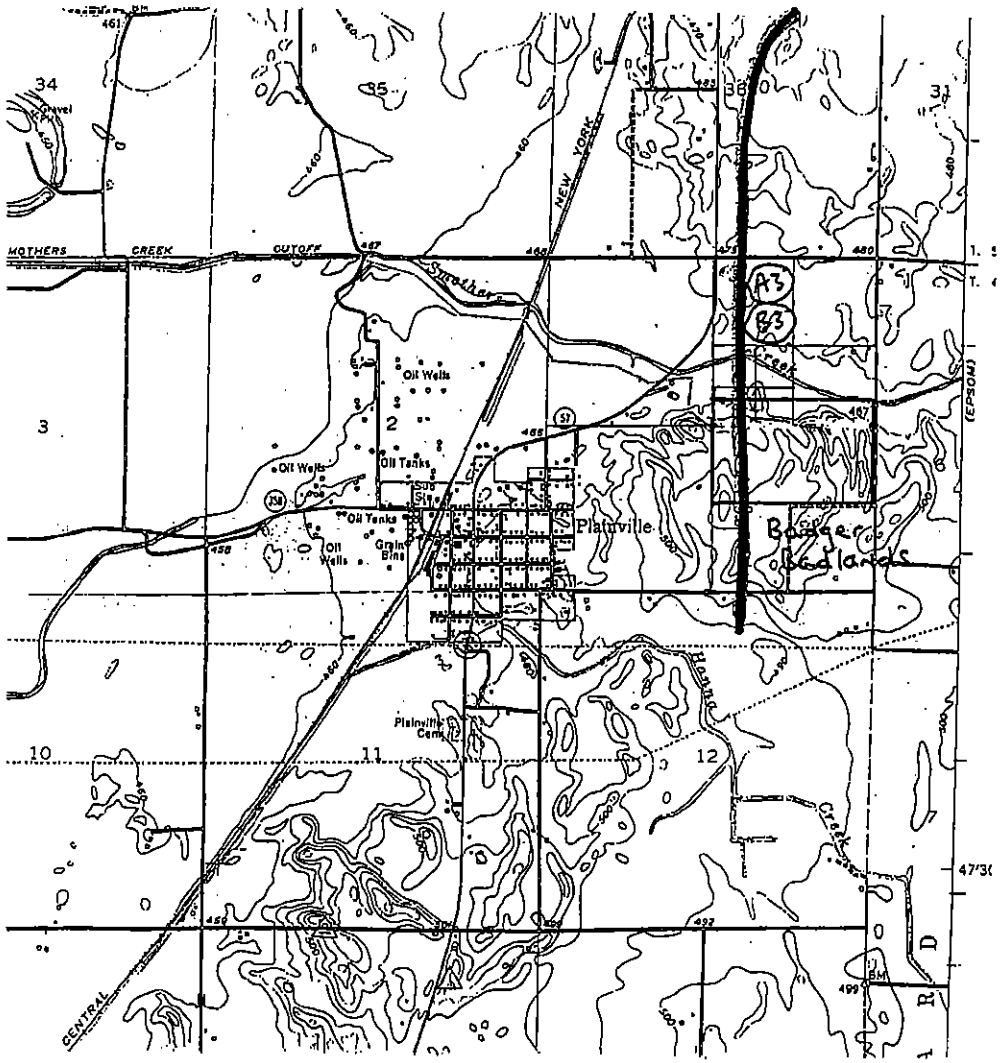
Thank you again for the opportunity to make these comments.

Sincerely,

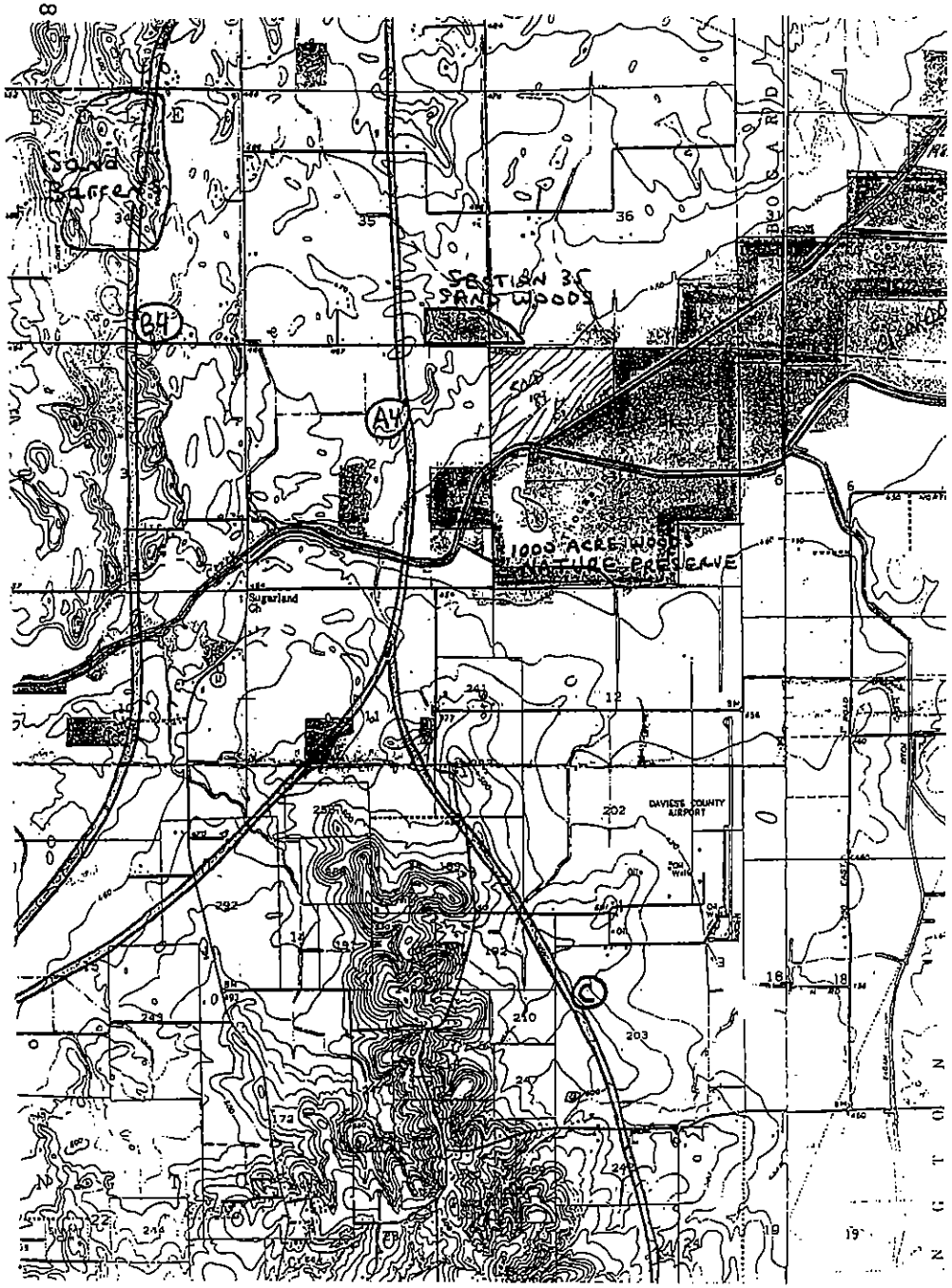
Chris Maron

Chris Maron
Director of Stewardship

cc: Dennis McGrath, State Director of The Nature Conservancy
Patrick Ralston, Director, IDNR
John J. Dillon, Commissioner, INDOT
Barton Peterson, Exec. Asst. to the Governor for the Environment



-458-



DNR Indiana Department of Natural Resources

Frank O'Bannon, Governor
John Goss, Director

Environmental Unit
Division of Water
402 W. Washington Street, Rm. W264
Indianapolis, IN 46204-2641

13 November 2002

Janice Osadczuk, Chief
Division of Environment, Planning and Engineering
Indiana Department of Transportation
100 North Senate Avenue, Room N755
Indianapolis, IN 46204-2228

Re: DNR #9642-1 - I-69 Indianapolis to Evansville Tier I Draft EIS; Multi-County (Marion through Vanderburgh)

Dear Ms. Osadczuk:

The Indiana Department of Natural Resources has reviewed the above referenced project per your request. Our agency offers the following comments for your information and in accordance with the National Environmental Policy Act of 1969.

Since our previous review letter, dated July 16, 2002, some of the proposed alternatives have been slightly modified to avoid or minimize impacts to ecologically sensitive areas. Also, the July 2002 Tier 1 Draft Environmental Impact Statement categorizes all of the alternatives into "preferred" and "non-preferred" alternatives. The department wishes to express its appreciation for the classification of alternatives 3A, 5A and 5B as "non-preferred" alternatives in recognition of their exceedingly high impacts to ecologically sensitive areas. | 6.2

From the list of "preferred" alternatives still remaining (2C, 3B, 3C, 4B, and 4C), alternatives 3B and 3C will likely have the most significant impacts to fish and wildlife resources. They would impact much more forest and core forest habitat than the other remaining "preferred" alternatives. Alternative 2C would have the least impacts to forest and wetland habitats, and it avoids the ecologically sensitive area within the acquisition boundary of the Patoka River National Wildlife Refuge (NWR).

The following are more specific comments regarding significant natural areas or features located within each of the proposed "preferred" alternatives.

Alternative 2C
Waverly Bog Natural Area Registry site is located almost directly in the proposed route. If the route will be near this site, we recommend that the actual highway be located away from Waverly Bog as far as possible, within the two-mile study corridor, to avoid any impacts to this important natural area. | 5.23

This alternative will directly impact approximately 840 to 935 acres of forest land, including 550 acres in Owen County.

We noticed a discrepancy in the location of sugarloaf mound/pyramid mound. You can get the correct location from Rachel Perry, Division of Historic Sites at 232-1633 or Hank Huffman, Division of Nature Preserves at 232-5052. | 8.2

Alternative 3B
This alternative passes through the Patoka River NWR, including several bottomland forest and wetland areas. These areas provide habitat for several state listed species as well as the federally listed Indiana bat. Although it may be possible to locate the highway within the two-mile study corridor so as to avoid direct impacts to these natural resources, the presence of an interstate highway, which is considerably wider than the existing highway 57, poses greater potential impacts.

An Equal Opportunity Employer

This alternative passes near two Division of Nature Preserves owned properties: Capehart Sandflats and Thousand Acre Woods, which are located south of the town of Plainville, and north of Washington, respectively. Of the possible alternatives in this vicinity, we recommend the Washington eastern bypass. If this alternative is chosen, the actual highway should be located within the study corridor as far to the east as possible, and thereby away from the Thousand Acre Woods bottomland wetland complex. | 8.2 | 6.2

There are several forest blocks immediately north of the Crane Naval Surface Warfare Center (NSWC) that would be fragmented by this alternative, including known habitat for the state endangered bobcat (*Lynx rufus*). | 5.17

The Combs Forestry Property, the Keisler Forest Legacy Property, and the Waverly Bog Natural Area Registry site are all located along this alternative. | 5.23

This alternative will directly impact approximately 1315 to 1450 acres of forest, including 440 acres of forest core.

Alternative 3C
The following significant natural areas/features are also located along this proposed alternative: Patoka River NWR, Capehart Sandflats and Thousand Acre Woods, forest blocks north of Crane NSWC, bobcat habitat, Combs Forestry Property, and the Waverly Bog Natural Area Registry site. | 5.23

Alternative 4B
The Patoka River NWR and the Capehart Sandflats and Thousand Acre Woods are located along this alternative. | 5.23

This alternative poses potential impacts to the state listed Loggerhead Shrike (*Lanius ludovicianus*). | 5.17

This alternative will directly impact approximately 935 to 1005 acres of forest, of which 142 acres are forest core.

Alternative 4C
The following significant natural areas/features are also located along this proposed alternative: Patoka River NWR, Capehart Sandflats and Thousand Acre Woods, and the Waverly Bog Natural Area Registry site. | 5.23

This alternative also poses potential impacts to the Loggerhead Shrike.

This alternative will directly impact approximately 805 to 935 acres of forest, of which 97 are forest core.

In summary, of the "preferred" alternatives being considered, alternative 2C poses the least amount of potential impact to natural resources. | 6.2

Our agency appreciates this opportunity to be of service and apologizes for not being able to respond sooner in this matter. Please do not hesitate to contact Christie Kiefer, Environmental Coordinator at (317) 232-4160 or toll free at 1-877-928-3755 if we can be of further assistance.

Sincerely,

Michael W. Neyer, PE
Director
Division of Water

Note: Please include the above DNR # on any future correspondence regarding this project.

Keith Dunlap
32 Troon Ct
Greenwood, IN 46143
November 3, 2002

Michael Grovak
Bernardin, Lochmueller, & Associates, Inc
6200 Vogel Road
Evansville, IN 47715

Dear Mr Grovak,

I have spent the last several months studying the I-69 DEIS provided to me on CDs. I must say the document is impressive, but at the same time massively complex to comprehend. I am a professional engineer by trade and found the GIS-based maps to be the most helpful in understanding the rest of the documents. Despite that, I have to admit there was still quite a bit of the report I did not have time to read even though that was my goal before submitting my comments. I have attended the various public meetings and understand the emotions of many, but I wanted to keep my comments objective and fact-based. However, I have now scribed so many notes that I do not know where to begin, so I will simply express a few basic observations that blend details from the DEIS with my personal knowledge of the areas which will be impacted.

First and foremost, I have significant knowledge of Indiana caves and karst and I find all of the preferred routes in the DEIS to be troubling. I have been involved with highway projects in karst areas in the past and while I commend InDOT for their recent pro-active use of drainage traps and other environmentally "friendly" designs, I can not encourage such a major project across new karst terrain. Of much greater concern however is the secondary development that the interstate will encourage. This secondary development will add magnitudes of detrimental impacts, which will degrade the ecology of the fragile karst systems, and the biological ecosystem found within. One only has to look at the development that has occurred on the west side of Bloomington since the SR 37 bypass was constructed 30 years ago. Alternative 3B would push the housing, businesses, and light to medium industrial use further west towards the interstate, ruining areas like the Blair, Coon, and Garrison Chapel valleys. At least five Indiana bat hibernacula (Buckner, Coon, Grotto, King Blair, and Saltpeter) would be significantly impacted. Having been involved with the protection of Coon and Grotto caves for the past 18 years and having witnessed the bat populations (both Indiana and Little Browns) increase to record highs (currently over 14,500 bats), it is quite disheartening to think that these populations could be lost due to pressure of development instigated by a major highway just a few miles to the west. I would be more than happy to supply you with additional information on these important hibernacula as well as several "in preparation/in press" peer-reviewed scientific papers on the subject. | 5.17

1107-692

Likewise, the routing of I-69 through Greene, Owen, and southern Monroe will cause some primary and significant secondary impact to the karst systems found there. This is above and beyond the primary and secondary impacts to the forests, farmlands, wetlands, and other natural landscapes, which makes southern Indiana a desirable place to live in peace and harmony with the surroundings. To me the only acceptable route for I-69 is along an existing corridor, that being US 41 and I-70.

Beyond the environmental impacts, as a taxpayer, I can not help but comment on the "incremental" costs of the preferred routes over the Alternative 1 proposal. It seems unbelievable to spend up to $800 million more for alternatives with only slightly better performance scores. While the US 41/I-70 route may not be optimum, it meets the general requirements of connecting Evansville with Indianapolis without over-burdening the financial obligations of the State. Alternatively, I would just as soon see the "No Action" decision selected and use the federal funds to upgrade and maintain our already neglected road systems.

Finally, I'd like to comment on the social aspect of this highway. I think we often get bogged down in the numbers, charts, and economic issues and forget about the impacts to the thousands of individuals which will have their lives disrupted. This is more than the typical "not in my backyard" bantering; this is the uprooting of families, businesses, farms, forests, and communities. I can empathize in that my parent's farm was bisected by the construction of US 41 north of Terre Haute in the early 60s. While their house remained intact, their peaceful surroundings were forever lost and their large corn fields became many smaller ones. Yes, the common good for many may have been improved, but at what cost to those who are displaced or inconvenienced for the rest of their lives.

To summarize my comments:

1) All of the preferred alternatives will have unacceptable direct impact and even greater secondary impact to the environment, especially in the karst areas
2) There are several significant Indiana bat hibernacula that could be impacted for those routes running around or through Bloomington.
3) All of the new-terrain alternatives will have significant and unnecessary impacts on individuals displaced and disrupted by the construction of this road.
4) All of the preferred alternatives cost too much compared to the Alternative 1.
5) Perhaps the "No Action" alternative should be selected and InDOT should concentrate on appropriate upgrading and maintenance of our existing roads.

Sincerely,

Keith Dunlap

Subj: DEIS comments
Date: 11/7/02 7:14:22 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Virgil
LastName = Brack
StreetAddress = 781 Neeb Road
Address =
City = Cincinnati
State = OH
ZipCode = 45233
Email = vbrack@EnvironmentalSI.com
Comments = Several Alternatives, most notably Alt 3B, pass very close to significant hibernacula of the endangered Indidnd bat. Development of this alternative will likely result in take in several ways: (1) loss of sping and autumn roosting and foraging habitat, (2)loss of summer maternity habitat, (3) a direct take of individuals from traffic (as has occured in PA), and (4) disruption (primary, secondary, and cummulative impacts) of nearly the only hibernacula throughout the range of the species that are showing an increse. Two publications are nearing submission to peer-reveiwed journals that document the unique nature of these caves, however, these data have already been provided to the resource agencies. Damages to these recovering populations could constiture a threat to recovery of the species. 5.17

1107-221 Brack, Virgil.wpd

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

You failed to identify the bald eagle nesting area along the White River near Freedom. There are several eagles living in this area & therefore routes 2 & 4 should not be used. 5.17

RECEIVED
NOV - 4 2002
BLA

1104-056

Name Rosemary King
Address Rt 1 Box 1075
City/State/Zip Freedom IN 47431

The I-69 fiasco and reason number 20 why it should not be built:

Since INDOT seems hell-bent on building a new terrain highway no matter what the economic, resource, and human cost might be, I have undertaken a letter writing campaign to inform INDOT of their inherent ignorance of numerous points. I am writing this series of letters as a matter of formal public comment, and I fully expect INDOT to include this in their EIS and actually read and consider the points being made.

A twentieth reason why a new terrain I-69 cannot be built is the impact that would be sustained to endangered and threatened species. The EIS itself states that the route for alternative one had the fewest occurrences of federally threatened and endangered species. Alternative one also has the second fewest recorded occurrences of state listed rare, threatened, or endangered species of plants and animals. If minimizing impacts to RTE species carries any weight, then alternative one or the no-build alternative would be the only real alternatives to consider. 5.17

Furthermore, the habitat destruction that would result from construction of a new terrain highway project would have long-term negative impacts on RTE species that are known to inhabit the areas along new terrain alternatives. Since wildlife is important to the public, and important enough that the federal government passed the endangered species act decades ago to protect rare wildlife, then INDOT should pay heed to this factor for consideration of which route to choose. To purposely throw out alternative one, and act as if the no-build alternative is not really an alternative at all is to fly in the face of responsible decision-making. Again and again, INDOT has proven by its actions that they are purposely biasing this EIS toward a new terrain route.

I would think that since 80% of the money for a road project is from federal funds, INDOT would make at least the slightest attempt to address the negative impacts to RTE species and modify their decision to protect these species. One of the primary reasons for an EIS is to address the Environmental Impact of any project, mitigate that impact, and avoid it if possible. Since the no-build alternative and alternative one do this quite clearly, and since INDOT does not seem to even consider these as actual alternatives, it would be very appropriate for the federal government to launch an investigation into what kind of inappropriate decision-making processes are going on at INDOT. One might even suspect that money is being passed under the table to bias this study in favor of a new terrain route.

A new terrain highway is UNACCETABLE in southwestern Indiana. The only two acceptable alternatives are to not build it at all (preferable), or to upgrade US 41 / I-70.

Wayne Werne
RR 1 Box 254
Ferdinand, IN 47532

Wayne Werne

1106-136

Subj: DEIS Comments
Date: 11/5/02 8:34:09 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Bruce Kingsbury
Address = 6512 woodthrush Drive
City = Fort Wayne
State = IN
ZIP = 46835
Email = Kingsbur@ipfw.edu
Message = Hello-

I would like to mention several shortcomings of the I-69 DEIS. I make these comments as a concerned citizen, and from the perspective of being an expert on the biology of some of the species that will be impacted by the project.

The most important point to make regards the relatively complete dodging of the copperbelly water snake (Nerodia erythrogaster neglecta) as a consideration in planning. This is very disappointing. Options 3, 4, and 5 all cross the Patoka River directly through a part of what I and others consider to be habitat for the largest metapopulation of copperbellies in the state. 5.17

This wetland loss cannot be truly mitigated, and improper design will cleave the population. However, if the freeway is elevated on pylons across the entirety of the Patoka River bottoms, and habitat destruction is minimized during construction, then the metapopulation would remain intact. 5.19

Other areas of concern are Pigeon Creek, which has another large copperbelly metapopulation, and wetland forest losses along the White River.

The other issue I would like to raise is that of the insincere sampling effort of two drift fence arrays set up in the Patoka River bottoms. This effort to sample biodiversity in the area was anemic. Not enough traps were set, and they were used at the wrong time of the year. That they did not reveal any copperbellies or other interesting creatures is thus of no surprise. Nevertheless, I can attest that I have removed a copperbelly attempting to cross over Highway 57 at the Patoka River, that the population and habitat extends upstream and downstream from the work site, and that in its entirety, these bottoms are the most important place in the state for this imperiled species. I have also found the state Threatened eastern mud turtle in these bottoms only a few miles away. 5.17

As a closing thought, I would like to note that the Patoka River bottoms are some of our best wetlands because of their size and quality. They therefore warrant special treatment simply because of their value as an integrated unit. 5.19

Thank you for your consideration.

Sincerely,
Bruce Kingsbury

1105-024 Kingsbury, Bruce.wpd

Subj: I-69
Date: 9/3/02 8:13:33 AM EST
From: TNeal@cgcu.com (Neal, Timothy)
To: mgrovak@aol.com ('mgrovak@aol.com')

I have read most of the studies on I-69. On routes 2&4 they talk about the eagles at Hilenbrand state wildlife area 6 miles away. There are several productive eagle nests along SR 67 between Spencer & Worthington on White river . A year or two ago there was piece in the Bloomington news paper about a nest that is on White river just south of Worthington. This is concidered the most productive Bald Eagle's nest in Indiana by the DNR. Routes 2&4 would be ran within 1.5 miles of this nest. 5.17

0903-001 Neal, T.wpd

Subj: DEIS Comments
Date: 10/31/02 6:48:08 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Betti Fuller
Address = Route #1 Box 76
City = Worthington
State = IN
ZIP = 47471
Email = bets@custom.net
Message = As with many rural citizens of Southern Indiana, I too am concerned with the proposed I-69 invading our quiet countryside.
I have concerns for the Eagles along White River at Worthington, were they considered in the impact study? Were the Indian burial and hunting grounds a consideration? Locally known is, The Buffalo Trail which may not make an impact on a study, but it is something that cannot be replaced once destroyed. 5.17
Yes, the farmland to be taken is only a small percent from the entire State of Indiana. But, farming is THE major industry in my neighborhood and a loss of any portion will have a major impact on the local economy which is already struggling.
I ask, what is our gain? A twenty minute savings in time traveled does not come close to being the same value as the fabric of a community. A life-time of noise and air pollution is a sacrifice our community should not be asked to make.

Betti Fuller
Route #1 Box 76
Worthington IN 47471

1031-009 Fuller, Betti.wpd

Rene Rezvan
9687 West State Road 48
Bloomington, IN 474074
(812) 876-9329

November 3, 2002
Michael Grovak, Project Manager
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, IN 47715

To: Mr. Michael Grovak,

I am writing to you as I am the home and property owner of 9687 West State Road 48 in Bloomington. I have owned my home for almost 9 years. I am very concerned about the "surveys" through my area. My home and my neighbors at 9689 (we share the driveway) stand to loose our homes if the route 3 b or c is chosen. I have 6 acres and my neighbor has 80 acres. I have enclosed an e-mail from Mr. Mills stating his knowledge of his property (he is currently living out of state but will be transferred home soon).

I will not take up your time rehashing the environmental destruction, cost and loss of personal property any route except 41/70 would cause as you have all that information many times over. What I need to inform you about is my property and Mr. Mills. I have been over various maps that show the "surveys" done on surrounding land. A mile or so up the road in one direction shows "donated protected property" which pushed the proposed route 3 b & c to our homes. In the other direction a mile or so up the road toward Rice, Cave and Garrison Chapel show KNOWN caves and sink holes which pushed the route again to our properties. On no map were there any caves or sink holes listed on our properties. I have had Mr. Sam Frushhour from the IU geology department out to our properties to verify the information I am about to give and he will have the information included in the various reports he has been submitting regarding the I 69 projects. On my own property I have found 4 caves – 2 I have gone into – one has a 24 foot drop and opens up into a 30 foot room with side tunnels – the other one had a 14 foot drop and opened into about a 10 foot room with side tunnels. I also have at least 3 large sinkholes. My neighbors property has various large sink holes (I have seen 6 of them) and numerous caves one of which has a 60+ vertical shaft and there is also a year round spring near the top of the hill. The Mills have given permission for these sites to be mapped and I would love the chance to have some one from your department verify this information. 5.23 My next concern is that the "surveys" don't list that the fronts to our properties as being in a flood zone. Everything from Highway 48 to Richland Creek is a registered mapped flood zone but is not included on any of your mapped "surveys". It does really flood and at times all the way to the road which makes part of our front yards and driveway at times about 3 feet under water. 5.18

Now aside from the devastating effect that this would have on Richland Creek and the surrounding "woodland creatures" you would be destroying my dream home. I have put my heart and soul into my home and property for the past 81/2 years. I realize many people are saying you will be taking my home but I believe I have a unique and irreplaceable home and

property and here's why: When you pull into our long driveway flanked on both sides with numerous massive pine trees, and then you drive over a wooden bridge that crosses approximately 15 feet above Richland Creek to our homes. Out my front door about 20 feet away is Richland Creek with a wonderful waterfall. This alone is a unique feature but also many days a week there are a pair of magnificent Blue Herons that stand on this waterfall to catch fish. They are here year round and I don't believe I could find another property that would include this amazing feature. Most days I have foxes, turkeys, deer and the like to share my life with also. I have done extensive landscaping and renovations to my home over these years and the only thing I have not done myself was replace my roof. Being a single female I am take great pride in this and in all that I have accomplished that I was told that I couldn't do and now that I am just about finished and able to truly sit back and enjoy it – I stand to loose it all! Ant to make it worse my route of 3 b& c is the most costly, most devastating to the land, most intrusive to businesses and individuals. All so a total of 5 to 15 minutes could be cut off of some peoples driving time?

Please note that my property as well as Mr. Mills has numerous caves, sinkholes as well as being partially in a flood zone. None of which shows up on any of your "surveyed" land maps and I believe should make you exclude the use of our properties. PLEASE CHOOSE THE ROUTE THAT UTILIZES THE EXISTING 41/70 ROADS.

Thank you very much for your time and consideration regarding this matter which will have a devastating effect not only upon my life but other people, wildlife and the surrounding beautiful countryside if the proposed "New Terrain" goes through.

Sincerely,

Rene Rezvan

Rene Rezvan

from the desk of:

Mike Carnahan

R.R. #1 — EDWARDSPORT, IN 47528 HOME: 1-812-735-5663 OFFICE: 1-812-735-5260

October 21, 2002

Michael B. Grovak
6200 Vogel Road
Evansville, IN. 47715-4006

Dear Mr. Grovak,

I have not been a proponent nor have I been an opponent of the highway expansion from Evansville to Indianapolis. However, I do have concerns as a lifetime resident of Southwest Indiana where I have been involved in agribusiness and the transportation industry for over 40 years.

As I apply my knowledge of the area and its agribusiness and transportation needs, I do have issues with some of the proposed routes that are being discussed. It is my understanding that the overall goal of this expansion is to encourage business development by shortening the travel route from Indianapolis to Evansville. If this is the goal, three key issues stand out with the proposed routes.

1. Shortest route. It would seem that the best way to shorten travel time would be to take the shortest route from point A to point B. While I realize there are issues that can affect this, some of these routes go further out of the way than would seem necessary.

2. All routes should avoid Indianapolis congestion. Congestion on both sides of Indianapolis is already high and it would seem imperative not to add to existing infrastructure problems.

3. Daviess County plans. One of the Daviess county expansion routes runs through a flood plain, which could make this less than conducive to smooth travel, and more expensive to construct. 5.18

4. Development along the western route, around Washington would not include development or factories because of the flood plain issue.

Subj: DEIS Comments
Date: 11/3/02 8:18:52 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Lenore Tedesco
Address = Department of Geology, IUPUI
City = Indianapolis
State = IN
ZIP = 46202
Email = ltedesco@iupui.edu
Message =

After listening to a great deal of debate regarding the proposed routes for I69, I have reviewed the draft environmental impact statement. I am a geologist with research experience in water resource issues, both point and nonpoint source pollution, sediment metal contamination, and the fate and transport of environmental contaminants. I also have an extensive research background in wetlands and wetland restoration. I am based at IUPUI and am keenly aware of the potential for a technology corridor extending between Indianapolis and Bloomington. With this background, I make the following comments regarding the selection of an interstate route. My comments focus on the northern portion of the routes between Indianapolis and near Bloomington, as I am most familiar with the geology and terrain of these areas.

1) Given that the factors associated with the highest levels of performance in the analysis list Service to Bloomington and Service to the I37 Corridor as the first two items – it seems intuitive that the selected route would follow I37 to near Bloomington. This is the logical choice given the importance of the longer-term economic growth and development of a high technology corridor to the state. None of the other routes accomplish these two critical goals. Without these functions, it seems hardly worth the cost, inconvenience and significant environmental impact that the construction of an interstate will have on the State of Indiana.

2) None of the proposed routes is devoid of impact to residences and businesses or environmental impacts. Given that there is no ideal route, it is important that the final route minimize impacts to water resources. Water resources are non-renewable and impacts are essentially impossible to correct. It is also fair to say that the importance of improving water quality to our rivers and streams and groundwater resources will only increase as we look to the future. An additional note is that while impacts to wetlands are routinely "mitigated", the failure rate for mitigation is exceedingly high. Failure rates are as high as 71% for forested wetlands in Indiana (James Robb, IDEM, 2000) and 67% for riparian woodlands nationally (National Research Council, 2001). 5.24 7.1

Routes 2 and 4 follow the White River, traverse its floodplain and have numerous tributary creek crossings. Especially damaging in this regard is extension 2C/4C where the route cuts from I37 south of Martinsville to I67 at Paragon. This section of route runs the floodplain for the entire route. Route 2C1 adds an additional crossing of the White Rivers itself. Route 2C has the highest floodplain impacts of all routes considered and should be avoided. 2A, 2B are better choices to minimize this particular impact. 5.18

Routes 2 and 4 are still poor choices from a water resource perspective given that the routes continue to follow the floodplain of the White River through Morgan, Owen and Green Counties. Route 2 suffers from the additional insult of coming in close proximity to the Goose Pond, a large wetland complex enrolled in the Wetland Reserve Program. 5.19

Route 4C has high floodplain impacts (1550-1810 acres), the highest number of stream crossings (130-145) and the highest wetland impacts at 140-190 acres. Route 4B also has high wetland impacts at 115-165 acres and as such, should be avoided. 5.18

Finally Routes 2 and 4 completely fail to provide linkage between Indianapolis and Bloomington and as such fail the fundamental test of the practicality of highway construction in the first place. Both Routes 2 and 4 should be removed from further consideration based on their high impacts to water resources. 5.19

3) Routes 3B and 3C are the best choices from the economic and overall benefit prospective. When comparing Route 3B with 3C, Route 3C has a lower overall forest impact, although the impact remains high.

I urge the committee to select Route 3B for final construction.

1103-010 Tedesco, Lenore.wpd

Date : Sep 1, 2002 19:24 GMT
To : Governor O'Bannon, Fax 13172323443
From : commonsense@commonsensei-69.org
Subject: Interstate 69 highway

Below is the result of your feedback form. It was submitted by (commonsense@commonsensei-69.org) on Sunday, September 1, 2002 at 13:24:18

My Comments:
Governor Frank O'Bannon
Statehouse
Indianapolis, IN 46204

Dear Governor O'Bannon:

My name is Paul Rawlins. I am 17 years old and I live in Martinsville and am against the proposed route around Martinsville. I believe that State Road 67 would be worse than 37 or any other routes, due to flooding, and the fact that thousands of dollars would be spent just to bring in tons of dirt for the highway to keep it above flood level. I don't see any reason for the Interstate being built at all, especially close to a relatively small town like Martinsville. I think this because I figure that I will see more people, more traffic, more wrecks, more drugs, less farmland, and taking of land that was passed down through generations. I love to live in a small town, among fields, due to the little crime,(compared to cities), the closeness of the citizens, the fresh air, quietness, and reflection of the beautiful land that God has given me/us. I would truly hate to see my older friends, who have worked, lived, on farms get thrown off of their land, and be forced to stop I doing what they love. I don't know much about the other routes, but if this Interstate 70/US 41 is a better route, please choose it. 5.18

It's not worth spending hundreds of millions dollars and the taking away of precious land, and bonds of friends to build a new-terrain highway that saves just 10 minutes on the drive from Indianapolis to Evansville.

In addition to saving money, I-70/US 41 will preserve thousands of acres of Indiana's remaining farmland and forests, avoid harming our communities and leave money available for needed transportation projects throughout Indiana. I would truly appreciate it if you would do this. My family has very little land compared to others, but it is still land that was passed down through the family.

I don't know how this works into politics, and how this will effect your career, but May God Be with you and Your Decision. Thank you for considering my opinion, and May God fill you with Wisdom, and Strength for all of the difficult decisions you have to make day to day.

Sincerely and May God Bless You,

F. Paul Rawlins
4244 S. Lingle Rd.
Gosport, IN 47433

My Name: F. Paul Rawlins

My E-Mail Address: paulrawlins@hotmail.com

submit: Send Fax

0901-005

Subj: New I-69 Study Form Feedback
Date: 11/5/02 9:14:15 AM EST
From: ebrown@wrtfd.org (Eric Brown)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Eric Brown
10652 N Smokey Row
Mooresville, IN 46158

Message:
This email is in reference to your proposal of using an area along Mann Road to constuct I-69.

I currently own property in this area and want to let you know that like thousands of other property owners in this area, I oppose this option.

This area serves a water source for hundreds of thousands of water uses and is protected by the Indianapolis and Bargersville Water Companies. Adding this potential pollution hazard will affect many more than just property owners in the area. 5.24

Much of this area is also located in the flood plane which affects many people downstream. Adding the additional run off of water from the concrete roadways will greatly impact the amount of water that will be damaging area property from the increased flooding. 5.18

Please use the route of using the existing State Road 37, this are is already impacted by traffic and would be a much better location for commerical traffic.

1105-030 Brown, Eric.wpd

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW. USE THE REVERSE SIDE, IF NECESSARY.

INCERPORATE EITHER BLOOMINGTON OR TERRE HAUTE IN THE PREFERRED I69 CORRIDOR DO NOT ISOLATE BOTH COMMUNITIES BY SELECTING A ROUTE THAT HELPS NEITHER PROSPER.

WETLANDS AREAS ARE TERRIBLY AFFECTED BY ALTERNATIVES 2 & 4. MANY ARE NOT ON THE PRESENT STUDY MAPS SPECIFICALLY SEVERAL LAKES & WETLANDS AREAS IN OWEN COUNTY. A MORE RECENT PHOTO MAP AND REALIGNMENT IS REQUIRED. 5.19

0819-089

(continue on other side)

Subj: DEIS Comments
Date: 11/4/02 1:01:50 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Ed Frakes
Address = 3646 West State Road 66
City = Rockport
State = IN
ZIP = 47635
Email = gunther@evansville.net
Message = I am writing to you today to say I am opposed to the new terrain interstate. My wife and I have property in Pike county where we are having a new house built. The new terrain route will take our house and property, along with many acres of wildlife habitat in the Patoka river bottoms. I agree we need a better road to Indianapolis however I don't think it needs to be at the expense of thousands of acres of farmland, peoples homes, and destroying wildlife habitat,also wasteing hundreds of millions of tax dollars for the more expensive new terrain route. The existing routes of I-70 and U.S.41 should be upgraded which will serve the same purpose at a much lower cost! 5.19

Thank you,
Ed Frakes

1104-001 Frakes, Ed.wpd

United States Department of Agriculture

NRCS
Natural Resources Conservation Service
6013 Lakeside Blvd.
Indianapolis, Indiana 46278

October 31, 2002

J. Bryan Nicol, Commissioner
Indiana Department of Transportation
100 North Senate Avenue, RM N755
Indianapolis, IN 46204-2228

Dear Mr. Nicol:

I would like to thank you for the opportunity to comment on the Draft Environment Impact Statement for I-69. I will limit my comments to NRCS's area of concern, which is the effect of the proposed construction on prime farmlands.

The Farmland Protection Policy Act gives NRCS the responsibility to assist in the identification of prime farmland affected by federally funded construction and to offer assistance to agencies to mitigate the impacts of the loss of prime farmland. In reviewing the draft EIS it appears that a very good job was done in identifying the potential for the loss of prime farmland along the many alternate routes. However, the proposed mitigation for these losses is inadequate in our opinion. I would like to suggest an alternative method of mitigation that the Department should consider. 5.20

Prime farmlands are not like wetlands. Mitigation can not be achieved by creating additional farmland. However, INDOT could help mitigate the effect of the loss of prime farmland by protecting other farmland in the state from development. Typically land can be protected from development by buying the development rights from the farmer and placing an easement on the land that limits its use to agricultural purposes. One method of doing this is through the USDA Farmland Protection Program. This program allows the Federal government to pay 50% of the costs to protect farmland from development. This could leverage any money invested by the state and significantly increase the amount of farmland that could be protected. Details about this program can be found at the following website www.nrcs.usda.gov/programs/fpp/. 7.1

A group which might also assist you in determining how best to proceed to protect farmland in Indiana is the Indiana Land Resources Council (ILRC). The ILRC was established by the legislature to deal with land use issues in Indiana. They are very interested in the protection of farmland. The Director of the Land Resources Council is Joe Tutterrow. He can be contacted at 317-234-5262.

However INDOT should choose to proceed, NRCS will be happy to assist you in addressing the mitigation of the impact from the loss of prime farmland. If you have any questions about these comments please contact Phil McLoud at 317-290-3200 x 348.

Sincerely,

Jane E. Hardisty

JANE E. HARDISTY
State Conservationist

1031-017

The Natural Resources Conservation Service provides leadership in a partnership effort to help people conserve, maintain, and improve our natural resources and environment.

An Equal Opportunity Provider and Employer

Subj: New I-69 Study Form Feedback
Date: 8/5/02 12:55:24 PM EST
From: bobohill@bluemarble.net (Alan R. Mills)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Alan R. Mills
RR 2, Box 665
Spencer, IN 47460

Message:
I sent the following email to our local paper, Spencer Evening World:

The headline in the Herald-Times: "New I-69 list wins fans in area counties is a far cry from the reception here in Owen County. Greene County officials welcome the highway, and our own Co. Commissioner Bryon Stockwell welcomes it. But the narrow-minded folks with C.A.R.R. seem to have a real problem with accepting progress.

It is true that some farmland will be lost and some homes will be bought whenever any new highway is constructed. The I-70 / US 41 route will take a whole lot of farmland and residential areas. # 1, the local highway (US 41) will have to remain in place for locals to use for their daily commute. A new interstate will have to parralel the present US 41, and thus will take farmland that is far more productive than the farmlands of the proposed route(s) thru Owen, Green, and other counties. Then, there will be two highways for folks from Terre Haute, Vincennes, Evansville and points in between to travel on, going the same places.

I remember when I lived in Sullivan 30 years ago when folks were against US 41 becoming a 4-lane road, and bypassing the town. Now Sullivan is still there, and continuing to thrive. I don't see why they would ever need another highway to run right alongside 41.

This area needs the improvement that a new road would provide. Just the north-south traffic that runs through the middle of Spencer, on Morgan Street should be enough to sway even the narrowest of minds. Improvements around interchanges. such as restaurants, service stations, and motels would provide economic boost to our impoverished county, not only in taxes generated, but in new jobs.

No one raised a big stink when the coal mines desecrated our landscape, tearing up farmland and forests, and leaving useless heaps of rock and lakes so polluted that nothing will survive for centuries. Now the proposed Interstate might be able to go through those otherwise destroyed lands.

We must have too much farmland in this country anyway, elewise Congress would not throw away millions of dollars every year paying farmenrs not to grow crops. So what's the real price for giving up land for a highway? 5.20

Our narrow-minded folks who object to a new highway obviously don't do any travelling. In the past forty years I figure that I have driven somewhere between 1 1/2 to 2 million miles, some of which has been on the worst roads in the world. I must say that the U.S. Interstate System is the best roads to travel. As America's fleets of motor vehicles continue to grow by leaps and bounds every year, we must look ahead and continue to build new highways and update the old.

0805-005 Mills, Alan.wpd

Subj: DEIS Comments
Date: 8/21/02 2:20:05 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Clarence Eugene Dillon
Address = 7781 West Kirksville Road
City = Bloomington
State = IN
ZIP = 47403-9534
Email = cdillon@mcswmd.ogr
Message = As you read my comments I would like you to know a little about how my udgement was formed. I was born in the Mary Sherman Hospitol in Sullivan Indiana just a few feet from US 41 I grew up in Oaktown Indiana again only feet from US 41. I would like this part of my comments to reflect my concern about a US 41 route.

First, the unique farm ground of the Oaktown to Decker area is the most irreplaceable type of farm land in Indiana. This truck-crop ground is made up of sand dune tracks that is found in only a few places in Indiana. This ground yields much more in revinue then conventional croped ground. 5.20

As much of the income in this area comes from roadside sales, taking the road away from the farmers considerably lessens the income potential of the crop.

A second concern is that with only a county road crossing and a State highway intersection both North and South of Oaktown the residents of Oaktown may again be forced onto a dangerous two lane highway for access to Vincennes and Sullivan.

0821-052 Dillon, Clarence.wpd

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW. USE THE REVERSE SIDE, IF NECESSARY.

(1) Use the shortest possible route. This will reduce fuel consumption, air pollution, and fatigue. Going through Terre Haute is ridiculous.

(2) I suggest that someone visit Virginia and see what they have done with their interstate highways. Except in the cities and in the rock of the mountains, they are evergreen-lined parkways. The trees form a view break, a sound barrier, and a natural habitat. Fences separate the highway from the trees. The wider right-of-way would be worth it.

(3) Taking farmland is a non-issue. The entire farm problem is caused by too much farmland in use. 5.20

(4) Any references to "spiritual harmony", "respecting the earth" and other emotional pleas are religious activity, and do not belong in these hearings. 5.1

0820-189

(continue on other side)

(continued from other side)

Name: Larry Robinson lrobins@indiana.edu

Address: 1200 S PARK AVE

City/State/Zip: BLOOMINGTON IN 47401

Date: Thu, 03 Oct 2002 12:17:00 -0400
From: "sorensen@indiana.edu" <sorensen@indiana.edu>
To: <JBaxter.FH05INPO.FH05INDO@igate.fhwa.dot.gov>

Dear Mr.Baxter,

Thank you for your email response of Aug 30 to my earlier email below.

I am certainly not suprised to hear from you that in your opinion InFHWA and InDot have worked to ensure a fair process to evaluate I-69 project from Indianapolis to Evansville, Indiana.

Or that you confidently state, "The Record of Decision for this project will be based on a fair assessment of the issues" and your confidence in "InDot's integrity and ability to manage the public comment process."

Or that you further state, "The no-build alternative is part of the Draft EIS document and remains under consideration."

Unfortunately, after more than twelve years working with two Indiana Govenors, US Senators Indiana House and US Congressional Representatives, several InDot commissioners and Bernardin and Lochmueller Associate representatives to get facts about this project, I have arrived at a very different conclusion.

Because of my prior experiencce with InDot, I have absolutely no expectations at all about Hoosiers getting a fair assessment of the project issues. It would certainly appear that InDot is a rogue agency with only their political insider goals of any consequence - not the taxpayers.

As an example, the I-69 DEIS methodology is so biased towards the new terrain routes it is laughable. This charge of rogue agency has become even more true with the current politically appointed InDot Commissoner making statements about InDot not being influenced by public opinion. Bunk.

In these fiscally trying times, how InDot and presumably InFHWA has at the very least tacitly opposed the "No Build" or the "Common Sense" US 41/I-70 Alternative 1 is truly a mystery. When I say opposed, I mean InFHWA has allowed InDot to sweep the No Build and Alternitive 1 (US41/I-70) out of the public's view under the carpet. InDot's Commissioner's idea of prudent government leadership is , "InDot knows what is best for the Public, we won't (and don't have to) listen to the public." Double bunk.

It now abundently clear one of the routes (3 B in Richland Township)is in part so aligned to allow easy disposal of a PCB ridden real estate parcel currently owned by a large multinational corp. They would be paid with taxpayer dollars by InDot for gettting rid of this toxic liabilty. How many other skeletons are buried in the I-69 project? SIGECO now Vectren real estate deals? Why do so many alternative run thru Elren Indiana home of Grahamn Farm Cheese? How many political favors are due? The I-69 project has reeked just like the Salt Lake City Olympic scandle. 5.16

Last month in Green County, Indiana InDot employees entered private property and removed yard signs (private property) opposing new terrain I-69. And no, these signs were not on highway right of way. When confronted, these InDot employees said they were told by their superiors their jobs depended on the success of I-69 new terrain project. Triple bunk. What about the Bill of Rights-Freedom of Speech?

As you well know, this is NOT the only example of InDot's tactics in violation of citizens First Amendment Right of Free Speech under the US Constitution.

I am extremely sceptical about the apparent hand in glove relationship the US Department of Transportation's Indiana Federal Highway Administration has had and continues to have with InDot in this project.

For example, is it true InFHWA suggested and/or approved InDot's approach to the I-69 project purpose and needs statement? And is it true InFWHA signed off on the methodology used to for measure the alternative routes and core values used in the evaluation criteria for this project?

The InFHWA relationship with InDot has in recent months has often been referred to as a "rubber stamp" approval for the project. InDot's I-69 project has avoided, distorted and discounted public participation and honest comment input for years. It is unfortunate that InFHWA is precieved as a rubber stamp to condoning this approach.

I certainly hope your views about InDot are correct about these issues - that InDot will make a fair assessment. But looking at the Tier 1 Draft Environmental Impact Statement, it certainly appears that the "No Build" and Alternative 1 were not be fairly evaluated as alternatives.

For example, why weren't the benefits and the costs of the committed US41 to I-70 Bypass around Honey Creek Mall in Terre Haute NOT included in the alternative assements. At the very least it is certain the committed Bypass would increase the drive time savings of Alternative 1 and reduce the number of businesses impacted. Of course, it would add to the total cost of I-69 Alternative 1 too, but let's be fair and honest and evaluate the reality of Alternatives and stop stacking the new terrain deck.

If InDot willingly distorted the Tier 1 Alternative evaluation process in this way then the whole methodology of alternative process and core project values must be accepted for what they are - a new terrain biased approach to shepard a $2+ billion pork barrel project - against the will of the taxpaying public. Hoosiers won't stand for it. And neither should you, InFHWA or the USDepartment of Transportation!

And when the Hoosier voting public discover the real costs resulting from new terrain alternatives and the current Govenor and his successor are still slashing Indiana budgets for education and other worthwhile programs, someone will have to explain just where the money is going to come from for fixing existing roads in Indiana.

I think it would be fair to say, "Well the InFHWA was actively involved...".

Regards,

Clark Sorensen
8099 Breeden Road
Bloomington, IN 47403

1003-001 Sorenson, Clark.wpd

1320 Pickwick Place
Bloomington, IN 47401
October 30, 2002

Michael Grovak, project manager
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, IN 47715

Dear Mr. Grovak:

This is to register my disapproval of I-69 going through southwestern Monroe County's lovely rolling farm and forest lands, through agricultural and grazing lands of Green County and the Amish farm country beyond.

Every generation — or half generation — is despoiling our natural environment and it is unspeakably tragic, for the people of southern Indiana and our nation. We simply must preserve and care for our forest and farm lands — and habitats.

So many people have spent half their lives working (or all their lives) and caring for their lands, and governments are never about to adequately compensate them, or relocate them to equivalent properties — if that would be possible. If farmers or others decide to stay on their "cut-in-two" properties, the state will not pay for an overpass for them to have access to "the other side" of the highway. 5.20

Any highway route will be damaging, but economy should also be a major consideration, and the Terre Haute I-70/U.S. 41 route would be far more economical, and less destructive.

Indiana is in a difficult financial situation and it may get worse, so we need desperately to also have a frugal approach to this highway. There are so many other roads and bridges in our state that have been begging for safe repairs for years. We so need to take care of them.

The United States lost 1.2 million acres of farmland between 1992 and 1997 — probably twice that much since 1997, according to the U.S.D.A. Natural Resources Inventory, and some say Indiana has lost 1 million acres of farmland since 1990. We are engaged in the creeping destruction of our state and country. [illegible]

1025-034

Subj: New I-69 Study Form Feedback
Date: 10/23/02 11:06:18 AM EST
From: jmoreland@doe.state.in.us (John Moreland)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

John Moreland
4235 West State Road 44
Franklin, IN 46131

Message:
If in fact the Indianapolis airport is going to exapnt to the west of their current site, how would that expansion affect travel times or has that convientiently been overlooked. People traveling to and from the airport would have the best access via I70. How can no one route comcept offer a particular advantage regarding lost farm revenues when you own chart suggests that one could be as much as $580,000 and one $219,000. Again, you condradict yourself. Remember the secondary impacts of the land and environment around Bedford and Bloomington. THERE ARE STILL PCB'S IN THE SOIL! 5.20

1023--010 Moreland, John.wpd

Subj: DEIS Comments
Date: 11/7/02 8:10:22 AM EST
From: ezform@networkwos.com
To: mgrovak@aol.com

Name = Indiana Society of American Foresters
Address = 10650 E. SR 8
City = Cul;ver
State = IN
ZIP = 46511
Email = bwakeland@starband.net
Message = A Position Statement of the Indiana Society of American Foresters
(11/7/02)

Position

The Indiana Society of American Foresters recognizes the values and benefits that Indiana's citizens derive from transportation corridors that effectively link all regions of the state. We also are aware of the negative effects that these corridors, especially roads, can have on the surrounding landscapes— including natural landscapes (such as forestlands and wetlands), human-modified landscapes (such as agricultural land) and human communities, when these corridors are not appropriately, planned, designed and constructed. The Society is most qualified to address natural landscapes that are forested. 5.21

It is the position of the Society that the selected alternative should provide for the least amount of long term forest disturbance resulting from development that occurs in the vicinity of road corridors. Since all of the considered alternatives will result in a least some immediate reduction of Indiana's forestland base, the Society further recommends these losses be mitigated, by the afforestation of suitable open space within the vicinity of these conversions. In order to contribute to maintaining the current 20% of Indiana's landscape in forest cover, it is also recommended that these mitigation plantings exceed a 1:1 ratio.

Issue

Renewed interest has developed in extending I-69 from Indianapolis to Evansville, IN. Many are concerned about the selection of the route for the extension. Primary impacts have been investigated and reported in a recently-released Environmental Impact Statement (EIS) that contains 5 alternatives (with 4 of those having a suboption). All of these primary impacts are of either a social, environmental or economic dimension. The chosen alternative will reflect tradeoffs among these three dimensions.

Background

The discussion of an Indianapolis to Evansville automotive transportation corridor began in 1990. The passage of the Intermodal Surface Transportation Efficiency Act (TEA) in 1991, later amended in1998 (TEA-21) elevated the Indiana corridor to "interstate highway status" and the project began to receive national attention. The I-69 Corridor connecting the Canadian and Mexican borders was selected as one of the high priority areas under this new legislation, and the Indiana component was indicated as a high priority segment with significant implications for the North American Free Trade Agreement and interstate commerce. The initial EIS was completed in the mid-1990's. The current EIS now underway began in earnest in 1999.

Newly constructed, or upgraded transportation corridors, including controlled access highways such as interstates, have both positive and negative impacts to human communities. But they generally always have negative impacts to the surrounding landscape. While the maximum forested acreage that is projected to be lost by any one of the proposed alternatives is estimated to be 1500 acres, the real long term impacts to forestland may be significantly greater than this, depending on the alternative.

Impacts to the functions and values of forested landscapes occur when residential and/or commercial development occurs within these ecosystems—most notably by removing forest cover and breaking up existing forestland into smaller fragments. This development occurs as road corridors are esteblished—making what was relatively inaccessible now accessible to potential residents to live away and commute to their jobs. Land use conversion for commerce soon follows in order to provide the goods and services demanded by these new residents. These activities, along with other types of land use conversions, have reduced Indiana's original 20 million forestland acres to the current 4.5 million acres. The most recent (2000) U.S. Forest Service statewide forest inventory data suggests that, after a slight but steady increase in forest cover over the past several decades, total statewide forestland coverage may now be on a downward trend.

1107-548 Foresters, Indiana.wpd

October 8, 2002

OCT 10 2002

I am writing this letter to Beg and Plead-do not take I-69 over [illegible] TERRAIN !! Our lives, hearts and souls, land, homes, forests, farm ground, animals - none can ever be replaced and there will never be anymore LAND ! !

If you take the Route along 231 North from 67 to I-70 East of Cloverdale, it completely wipes out our 45 acres, our home, our daughter's new brick home and pole barnthat has been built since your map was taken - all that we dearly love. We are 66 and 68 years old and have been here for 36 years. I haven't slept a night thru since I realized this might happen to us.

I am disabled, have diabetes for 16 years, had polio at 13 and now post-polio. This is my Dreamland-Ihad hoped to live and die here on this GOD GIVEN place that I love so much. It is beautiful and peaceful here with our dogs and cats, many, many Martins and Hummingbirds and even a pair of Pilate woodpeckers and baby. My daughter has two beloved horses that use the old barn. They love that old barn and will have to move - where? We have never sold any timber off here and the woods and trails are very beautiful. Our neighbor joining us has just established a Wetlands and planted a zillion trees for an animal escape.

This route also comes within a mile of "Indiana's Largest Waterfalls" - Beautiful Cataract Falls and 500 acres of forest, which was GIVEN to the STATE OF INDIANA by Agnes Stuckey. I knew her and her daughter very well and my grandfather, mother and I all worked for them. I know you are concerned about caves, marshlands, etc., what about the FALLS! CAN'T WE PRESERVE ANYTHING? Where are all the animals going to go? Are we going to cement over EVERYTHING? 5.21

My husband operates a Dump Truck Service at and from our home. What happen's to that? This is a disaster to our lives! Where will we go to save his business? Please don't take this away from us!

My son lives and teaches in Indy and he says the 37 exit off 465 is the most congested exit in Indy. Why not widen that and 37 down to Martinsville (build them a new bridge over white river-they need it more than North Cataract Road and Cataract Falls Road do) meander along Bloomington-45, 58, 231, around Crane and follow existing roads and repair and widen them (I think people who already live right on the roads would care less about noise, etc.) to 64 and I64 to Evansville--much, much cheaper and sensible! OR BETTER YET - NO NEW TERRAIN AND USE I70 AND 41!

PLEASE DO NOT use NT 231 N from 67 N of Spencer to I 70 E of Cloverdale(#2 & 4- I think, unless it has been changed again - It is the last leg N to 70 to the West before the Terre Haute one) I AM TRULY BEGGING YOU TO SPARE US!

Gay D. Minnick

Gay D. Minnick
South Cataract Road
R R 2 Box 479
Spencer, IN 47460

P.S. We Will remember all involved and HOW at the polls in Nov. and thereafter!

PSS: All of the names collected on our petition have homes or interests in our area.

I008-004

Subj: DEIS Comments
Date: 8/21/02 1:31:01 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Castle H.S. Band Boosters, Inc.
Address = P.O. Box 641
City = Newburgh
State = IN
ZIP = 47629
Email = carriecat2000@aol.com
Message = We agree with your core goals, evaluation process, and strongly support the five preferred direct routes. Most weekends during the school year we transport bus loads of students to various contests and performances, many in central Indiana and the Indy. area. A safe and MOST direct route is highly desired.

Don't be influenced by rude, impolite, and loud groups in Bloomington and Terre Haute. If folks in Bloomington are afraid the highway will disturb their lifestyle, build the highway without a Bloomington exit and see how quickly they complain about that!

Seriously, regarding environmental issues, there are vast areas in southern Indiana (current coal mine property and old strip mine areas) that could be reforested to replace land taken for the highway. 5.21

Opponents of the highway attempt to minimize the travel time savings. But, a point not strongly made in the Summary is that this highway will exist for generations. We only have one chance to do it correctly. Even if the savings is only 20 minutes, that savings is multiplied by the number of vehicles daily multiplied by the expected life of an Interstate Highway. Plus, it's not just the travel time, it's savings in fuel and environmental impacts of producing and USING that fuel. Today we are under a "ozone warning" to avoid unnecessary driving, is this going to get better or worse during the expected life of the highway? We are not sure how to measure the economic impact, but how important to the environment would a savings of 20 minutes burning diesel or gasoline multiplied by the thousands of vehicles per day accrue over the life of the highway? Given how long the highway will exist, we would think this is a significant positive inpact, just for selecting the most direct route and the one-time cost to build that route. How else can you easily eliminate thousands of "20-minute trips" in a car or truck, daily? Finally, if an indirect route (Terre Haute)is selected, it is not just 20 minutes. There will still be many people that need to travel to points like Bloomington and Crane, etc. that will be doing so on stop-and-go local two-lane roads. The "lost" savings and environmental impact should weigh against an indirect route as well as the no-build option.

0821-060 Castle HS Band Boosters.wpd

PUBLIC HEARING COMMENTS

Teresa Colby... Good evening. I'm a mom I have three kids that have lived in Monroe County, I have been a teacher for many, many years. I might have had some of your children and I want to talk about a basic necessity of life for all of us..... even INDOT and that's water. It was touched on before. I've read or heard little about these texts of watered placement over any of the proposed routes or new terrain route. All of the KARST topography along these routes acts as a natural filtration system. Much of the ground water that flows into Lake Monroe water shed flows through this KARST topography. Any of these proposed routes will drastically alter the flow of ground water in the natural filtration system that provides us with our major water source..... Lake Monroe. With disrupted flow in water displacement comes the drying up of wet lands that may not even be directly in the path of this proposed route. Wells that provide the water to hundreds of farms and homes will be affected. Even wells that are not directly on the route. Water displacement can cause areas that have never been flooded before to become inhabitable areas. Water that flows underground is much less predictable than run offs and nearly impossible to survey in the maze of caves and KARST Topography that make up Southwestern Indiana. INDOT has not surveyed any of the underground water supply. I'm talking about our water a basic necessity of life that all of our children..... even the people from INDOT rely upon for life. Has the proponents decided that a gallon of gasoline is more valuable than a gallon of water, if so then the money that they save with the new terrain highway will have to be spent on the purchase of bottled water. 5.22

0820-107 Colby, Teresa.wpd

Subj: DEIS Comments
Date: 10/4/02 11:04:11 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Linda Cummins
Address = 4675 Cragen Road
City = Martinsville
State = IN
ZIP = 46151
Email = cummins@doe.state.in.us
Message = Just asking that you be aware of the streambank stabilization project completed by the Department of Natural Resources on State Road 37 North of Martinsville at Stotts Creek Bridge along the White River. There was a streambank stabilization project completed years ago that appears to be successful. If this route is chosen as I-69 and this area is disturbed, then this past project may have been for nothing. Remember the bank of the White River is not stable in this area or DNR would not have spent so much time, effort and money to complete this project. Just be aware that doing construction in this area may bring about future problems. Problems Indiana does not need with their financial situation. If DNR cannot afford to keep the State Parks operating, they will not be able to re-do this area in the future. 5.22

I suggest the least expensive route of I-70 and US 41, especially since the Indianapolis Airport has future plans to move their main entrance to the West side of the complex. Seems to me that utilizing the existing I-70 and upgrading US 41 would be the "wise" route to choose.

My vote, if it counts for anything, would be I-70 and US 41.

Linda Cummins

1004-001 Cummins, Linda.wpd

The Sycamore Land Trust

Post Office Box 7801 • Bloomington, IN 47407-7801 • Phone/Fax: 812.336-5382
www.sycamorelandtrust.org • sycamore@bloomington.in.us

November 7, 2002

Mr. Michael Grovak, project manager
Bernardin Lochmueller & Associates
6200 Vogel Road
Evansville, IN 47715

1107-701

Dear Mr. Grovak:

Sycamore Land Trust (SLT) strongly opposes I-69 routes 3A and 3B through or near SLT property. These two routes, 3A and 3B, pass through segments of the ecologically rich Beanblossom Bottoms (BBB). Corridor 3A includes about 65 acres in the west and south part of the Preserve. In addition, corridor 3B could clip off several acres of SLT property near Bottom Road to the east. 5.23

The following comments on the July 2002 Draft Environmental Impact Statement for the Evansville-to-Indianapolis I-69 study are submitted by the Sycamore Land Trust, a not-for-profit organization whose mission is to preserve the disappearing landscape of south-central Indiana.

History and Background:

1. On 5 June 2002, a meeting was held in Monroe County at the observation deck on Bottom Road to discuss potential routes for I-69. The meeting was called by project consultant for Bernardin, Lochmueller & Associates and was attended by representatives of the Federal Highway Administration, Indiana Department of Transportation, U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency, Indiana Division of Fish and Wildlife, and SLT.

2. SLT representative, Dave Hudak gave a detailed history of our land acquisition in the bottoms and our overview of biotic values, including documentation of the federally threatened bald eagle (Haliaeetus leucocephalus) or state-threatened Kirtland's snake (Clonophis kirtlandii), northern crawfish frog (Rana areolata circulosa), barn owl (Tyto alba), northern harrier (Circus cyaneus), and bobcat (Lynx rufus). Also, a large great blue heron rookery is located in the state nature preserve on the BBB preserve. 5.23

3. Bean Blossom Bottoms has a known outstanding biotic community, the almost certain as yet unknown biota which would add to the richness of the community, and to the biologically connected Muscatatuck National Wildlife Refuge. Naturalists have documented numerous resident and migratory birds here. 5.23

4. More than 700 acres of biologically-valuable land in the BBB are under state or federal protection. SLT owns approximately 641 acres in the BBB of which nearly 340 acres are State of Indiana dedicated Nature Preserve. These properties are the result of cooperation between many state and federal agencies as well as considerable help from private corporations and individuals. The legal and moral promise Sycamore Land Trust makes is to preserve these ecosystems forever.

5. SLT appreciated the opportunity to participate in the onsite meeting on 5 June 2002 and to provide comments on the Draft Environmental Impact Statement.

Summary:

Sycamore Land Trust strongly opposes I-69 routes 3A and 3B through or near SLT property. Two routes, 3A and 3B, pass through segments of the ecologically rich Beanblossom Bottoms (BBB). Corridor 3A includes about 65 acres in the west and south part of the Preserve. In addition, corridor 3B could clip off several acres of SLT property near Bottom Road to the east.

Sincerely,

Dan Willard
President

DH/cb
copy/ Bill Oliver
Joe Jones
Jeff Deck
Gene Baugh
Mike Baker

Advisory Board

Ross Brittain	Lynton Keith Caldwell	Steve Ferguson	Kenneth R.R. Gros Louis	Baron Hill
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Produced on 100% recycled paper

Subj: DEIS comments
Date: 11/7/02 9:44:59 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Julian J.
LastName = Lewis, Ph.D.
StreetAddress = 217 West Carter Avenue
Address =
City = Clarksville
State = IN
ZipCode = 47129
Email = lewisbioconsult@aol.com
Comments = Dear sir,

I am writing to express my concerns about the possible routing of I69 through the Monroe County karst. There are a number of regional endemic troglobitic (obligate cavernicolous) or phreatobitic (obligate groundwater) species that will potentially be impacted if the karst corridor is selected. I would urge you to choose a route that does not traverse this karst area. 5.23

Julian J. Lewis, Ph.D.
Cave Biologist

1107-295 Lewis, Julian.wpd

From: Michelle Henderson [mailto:mhenders@indiana.edu]
Sent: Thursday, November 07, 2002 5:19 PM
To: indot@ai.org
Subject: I-69 DEIS public comment

November 6, 2002

To Mr. Nicols and INDOT staff:

I am writing to voice my strong opposition to Route 3-C as well as any other new terrain route, and to encourage the use of I-70/US-41, which is currently a non-preferred route. Our house is in the potential path of Route 3-C, and it is located near two caves with Indiana bats which are not even shown on the DEIS. There are also numerous sinkholes on our property (4850 W. Evans Road) which are not on the DEIS. Building over this karst topography will be more expensive and more harmful to the environment than the DEIS currently reflects. I believe there are many other areas where the DEIS is inaccurate, and each of these inaccuracies will add to the cost of the construction and to the negative impact on the environment. I also feel that these inaccuracies are dishonest and self-serving, because they portray a less harmful impact than is truly the case. 5.23

Although I am most opposed to Route 3-C because it will destroy my own quality of life, I am equally opposed to all new terrain routes. I know others would share the same heartache and bitterness if their homes are taken and they are forced to lose the homes and farmland they have worked hard to purchase and maintain. With any new terrain route, there will be miles and miles of irreplaceable farmland and forest destroyed, hundreds of animals left without habitat, and roads lined with strip malls and fast food restaurants instead of trees. When natural resources are gone, they cannot ever be replaced, and the addition of fast food and retail jobs are a poor substitute for the loss of biodiversity that will result from a new terrain highway.

You are surely well aware that developers stand to make huge profits on a new terrain highway, which is why they are against the more fiscally conservative option of using I-70 and upgrading US-41 for I-69, and why they have paid huge amounts to lobby for a new-terrain I-69. We as taxpayers will be paying the price for a new terrain highway for the rest of our lives. I don't want to pay precious tax dollars to bring 10,000 semi-trucks per day through our city. I don't want to deal with the endless traffic jams and deadly accidents that will result both during and after construction of I-69. I don't want to lose my easy access to the east side of town, in terms of driving, school buses, and fire and ambulance service. I don't want the pollution, noise, or ugliness that I-69 will bring.

In short, I don't want I-69 in or near my city, and there are many, many others who feel the same way. It's clear that many people in Bloomington value the areas that make our city unique and provide us with a greater quality of life, and we don't want intruders from INDOT ruining that quality of life for the financial gain of developers and construction companies. Please take this strong opposition into account and choose the I-70/US-41 route as the final preferred route.

Sincerely,
Michelle Henderson
4850 W. Evans Rd.
Bloomington, IN 47403

1107-356 Henderson, Michelle.wpd

Patrick J. Munson
6707 W. Rock East Road
Bloomington, IN 47403
(812-824-7717)

2 November 2002

Mr. Mike Grovak, Project Manager
Bernardin, Lochmueller & Assoc., Inc.
6200 Vogel Road
Evansville, IN 47715

Re: Large spring and probable cave system in Proposed I-69 Alt. 3a-c, southwestern Monroe Co.

Dear Sir:

Relevant to what follows: (a) I am a landowner in Monroe County, but my property is miles from any of the proposed routes for I-69; and (b) I am an Indiana University professor with considerable experience with caves (I have authored or co-authored eleven articles in scientific journals on cave geology, biology, vertebrate paleontology, and archaeology).

The Draft Environmental Impact Statement has missed a large spring and probable cave system located at the eastern edge of the 2000' Study Corridor of Alt. 3a-c. The location of the spring is in the SW 1/4 of NE 1/4 Sec. 7, Indian Creek Twp. (T7N R2W), at the location shown on your maps (Alt. 3, p. 15) as a small pond about 1200 feet ESE of the divergence of the centerlines of Alt. 3c from 3a-b (the pond is fed by the spring, which issues on its NW side).

The spring flows from what is an obvious collapsed cave mouth. This cave and spring has historical documentation. Dr. John Thomas Freeland (born 1813) resided until about 1834 in a house on the location now occupied by the home of Mary Lisa Swoape (about 150 feet W of the spring). In 1891 Dr. Freeland wrote a letter, which contains the statement: 5.23

> "To the right [east] of the house is a cave that, with a little work, made us a fine milk house. . . . The roof of the cave has fallen in but the spring water still flows through it. With some work it could be cleared out and be as good as new . . . ."

On the basis of the geological member from which this spring issues (upper Ste. Genevieve Limestone), the relation of the spring to base level of streams, and the volume of water flow it is very likely that the spring issues from a large cave system. It has the same external characteristics as three large spring caves in western Indian Creek Twp. and adjacent Center Twp. of Greene Co. (*viz.* Weaver Spring Cave, Buena Vista Cave, Deckard Spring Cave), each of which has 2000 to 5000 feet of mapped trunk passage.

Given the configuration of valleys at this location, the presumed cave system can only extend to the northwest, which places it directly under the proposed centerline approximately where Alt. 3c diverges from Alt. 3a-b.

Sincerely,

Patrick J. Munson (Ph.D.)

cc: M. L. Swoape (landowner)
B. Nichol (INDOT)
S. S. Frushour (Indiana Geological Survey)
Monroe County Commissioners
Monroe County Plan Commission
T. & S. Tokarski (CARR)

1102-015

Gretchen Mominee
PO Box 2345
Bloomington, IN 47402
(812) 339-7427

19 October 2002

Michael Grovak
Bernardin, Lochmueller & Associates, Inc. 6200 Vogel Road
Evansville, Indiana 47715

Dear Mr. Grovak,
I am writing to express my strong opposition for the New Terrain I-69. It is deplorable that the common sense route, utilizing the existing I-70 and upgrading US 41 are being considered "non-preferred."

It is my understanding that the amount of karst features that would be affected by the new terrain routes was underestimated in the Draft Environmental Impact Statement. Landowners along the corridors in Monroe and Owen counties have noted that there are springs and caves in these areas that INDOT apparently was unaware of. Karst systems represent fragile ecosystems which could be irreparably altered by runoff from petroleum and salt runoff as well as spills occurring on the highway, and these impacts are not presented in the Draft EIS. 5.23

It is also my understanding that using the common sense I-70/US-41 route instead of any of the five "preferred" routes would save about 5,000 acres of farmland, over 1,000 acres of forest, as well as avoiding the Patoka National Wildlife Refuge and an Amish community in Daviess County.

The EIS shows that the Common Sense route would save about $600 million. I would much rather see transportation money being spent on road maintenance, or better yet, a mass transit system, than on new construction of a road that will destroy state natural and cultural resources.

I am curious what potential good could come from these "preferred" routes and just who prefers them?

Thank you for your time.

Sincerely,

Gretchen Mominee

1021-025

Governor's Internet Mail

From: Axis: Enterprises [axisent@bluemarble.net]
Sent: Wednesday, October 23, 2002 6:43 PM
To: fobannon2@state.in.us
Subject: Re: Automatic Reply, Please respond if you did not include your mail address.

Governor O'Bannon,

I e-mailed you a few weeks ago about my house being on the routes 2 and 4 of the proposed I-69. Since then I have done some investigations about your plans for my peice of mind. I feel really bad about losing my house, but if it is for the better of local people then I should not stand in the way of progress. What I have found, so far, is not convincing me that we need this road locally. I do not think that honesty has prevailed on the part of the State. To be fair, I do think there is quite a bit of propaganda on both sides. I do not know who to believe!!

The main reason I have heard for building I-69 is to link Indianapolis to Evansville. That is clear. Why not I-70 to 41? Is a road through us going to bring jobs to our area? Sure, plenty of businesses have left the area to head to Mexico. Is that a problem due solely to no interstate or just a nationwide trend? I surely have not had a hard time finding work!!

Are the people living in my area saying that they want it to run through our county? The majority of people I have talked to do not want it. Unfortunatly, most of them think that it does not matter to you what they think, or are just too scared to speak up. That fact in it's self is scary to me.

In this era I do not believe that the environment is really a major issue to most people. But you should be fair with your studies. I saw an environmental impact statement put out for this I-69 study, and it was not even close to accurate. I saw only two sections of it and it left off more than it showed. The map said there were no caves in the corridor. Well that is untrue. I have been underground in a few of them around my house. Not one spring icon was shown on the map. There are at least 5 within 1 mile of my house, including what the NSS says is Owen County's largest. What about the blind cave fish population to the south of me (right under the route). Or the bald Eagle that is often spotted right on my road? I understand not everything can be accounted for with such a big area for you to study, and so many routes. Although, these kind of things are pretty major for a group that has been working on this project for so long, and spent quite a bit of money on, to overlook. 5.23

Subj: New I-69 Study Form Feedback
Date: 11/7/02 2:58:35 PM EST
From: dan@prater.com (Daniel Prater)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Daniel Prater
2550 Yeager Road, Apt. 18-10
West Lafayette, IN 47906

Message:

I commend INDOT on providing well-summarized and simplified information to the public.

I can understand the difficulties and trade-offs that a project of this size may have. I realize that this is not a "democratic" process, but I would like to express a "vote" to exclude the "non-preferred" alternatives, of course, due to their environmental impact. Hopefully these will not be further examined as feasible route options.

I have outlined some concerns I have personally, and as you will probably read, I am concerned with impact that will last for longer periods of time, such as environmental impacts, and not so concerned with factors that are of transient concern, such as construction costs and business relocations.

Cost of construction should not be considered as heavily as it is. From a public approval standpoint, higher construction costs constitute heated disapproval, but in my experience, this is transient. Ergo, I believe lower construction cost options are not much better, really, than higher construction cost options. The difference, I believe, will be eclipsed by construction taking longer and being overbudget anyway, and the differences in cost between the options are insignificant compared to overall state and federal spending.

I would also like to express that the difference in travel times between the leading route options (2C, 3B/C, 4B/C), are not that much different, and in all cases, seems to be in the range of 3 minutes of each other. Thus, I feel travel time difference should be a minor concern. Just putting the corridor in has saved enough time in all cases, that the differences are now negligible.

Next, as an aerospace engineer, I feel access to Crane is of a minor concern. The economic impact of providing better access to this base is a factor perhaps, but there are also security issues to address. I am not knowledgeable regarding the impact that having a conduit near crane would cause, and therefore I cannot comment to any greater extent. I have the simple impression that access to Crane will prove insignificant (maybe they'll make a "History of Naval Surface Warfare" museum - big deal).

I am not concerned with business or residential relocation. Again, like debate regarding construction costs, this is transient. One half generation from now the businesses and families will be in a new place, and it will be home, again.

I grew up on a small farm, and therefore understand the impact that traversing farmland will have, and I feel that although it is quite important for the individual farmer, as long as provisions are made for their reimbursement, such as the full purchase of new land in surrounding regions, or cash purchase of their land above market value, I feel these acres will not impact the project in the long term as much as will other factors.

That said, I do find great concern in proposed routes that constitute environmental impact. These are not at all transient impacts, and will prove irreplaceable. In all land areas of concern (forests, wetlands, nature preserves such as the bat caves, beanblossom, tinchor, etc.) the environmental impact of disruption by a highway system is not predictable, and thus should be avoided at all costs. These areas are some of the only few attractions Indiana has from an ecosystem standpoint. Wetlands can be reproduced in adjacent areas, adding to water quality, but both beanblossom, tinchor, and the bat caves are far too valuable to disrupt. I also expect money and a project effort to be initiated for the construction of equal-acreage forest land for every acre of forest disrupted by the highway. I also expect a similar reimbursement of wetland area, with wetland area being tripled. Indiana used to be 80% wetland, and now our water stinks, literally, due to wetland loss. Both forests and wetlands can be "relocated", through defined construction efforts, and if these are formulated into a spin-off project, then environmental impact can be avoided in these areas.

I could go on with a lenghty and heartfelt discourse on why I-69 should not continue through areas of environmental importance, but I won't, and leave you only with the statement that I feel quite strongly about this, and what I write doesn't scratch the surface of how important these places are both to me, and to countless people who should have, but did not express their concern. I hope that in this respect, my words speak for a thousand.

In summary, the non-renewable natural resources, such as the bat caves, tinchor, and beanblossom, and any other unique ecosystem impacts should be avoided at all cost. NO route options should be furthur persued that disrupt, in any way, such resources. Furthermore, replacement of wetland and forest area should be guaranteed, with an emphasis on the tripling of wetland area, and at least an equal-acreage expansion of forest area. This could include expanding Dean wilderness area near Monroe resevoir. I think guaranteeing what is in this paragraph will reduce public environmental concern greatly, and would provide much more public confidence in this project. 5.23 7.1

Though it would be quite costly, reimbursement of personal and business relocation costs, including reimbursement of farmland loss, would provide measurable public confidence gains in this project, and I hope to see a guarantee of this in the future.

Please contact me if you have any questions, or if I could be of any service to the project in any way.

Thank you for your time,
Daniel Prater
2550 Yeager Road, Apt. 18-10
West Lafayette, IN 47906
ph: (765) 412-3163

1107-102 Prater, Dexter.wpd

It would be a drastic mistake to run I-69 through Norwest Woods (alternative route 3B). Our neighborhood, which is situated in Norwest Woods behind the old Ivy Tech building, is sitting on top of a cave. This cave has many caverns, one of which is located on our property. Many bats can be seen in our woods near the entrance of this cave, which is located on the property of our neighbors, Rev. Rick Amerine and his wife, Rayna (3115 Norwest Woods Circle, 812- 332-5374). This cave has been spelunked and explored before. Our neighborhood is honeycombed with several sinkholes, some near the entrance to the cave. As such, this IS NOT a viable route for a highway, nor is it a responsible choice. 5.23

My husband and I currently reside at 3104 Norwest Woods Lane. We are both self-employed, as we own our own business. The name of our business is Homeowner Services. The path of the highway would come right through our office. A relocation for our business would be a financial hardship, and it would set us back indefinitely.

Victoria James-Houff

Victoria James-Houff
3104 Norwest Woods Lane
Bloomington, IN 47404

cc: Citizens for Appropriate Rural Roads
Indiana Department of Transportation

1106-135

PUBLIC HEARING COMMENTS

Chris Schelicher... Do you all drink water? Everybody drink water here? Yeah you shower..... yeah you need water, everybody needs water. I've noticed a very glaring error in their tier one big picture process that is suppose to consider Environmental Impact. It does not mention water quality..... not one little word about water quality, they say something about wetlands but nothing about water quality. And then I noticed another funny thing when I looked at these maps the other day, where I live it is not depicted, there are sink holes, there are parts where the water goes down and sometimes it's so loud I can't hear myself think. This water, I poured red food coloring down some of these holes and it'll come out other holes and it's disappeared in other holes to never be seen again or maybe it's gone into my neighbors well. All rural people, nearly all rural people that I know get their water from ground water, and the runoff from this highway will go directly into the creek where I live and it will go down into these caves and it will go down into these wood hedges and it will come in these other holes and it will come out in my neighbors well and maybe somebody on down the road. This is, this was not just a little area I'm talking about, and when I'm talking about a glaring error on their maps, I'm not talking about just my place. I think they're willfully hiding these kinds of features so that people will not realize the impact on their own life. They have not considered our quality of life. They have not considered our quality of life. And they're doing it willfully. They have..... they are doing this on purpose, they are circulating misinformation. 5.24

0820-105 Schelicher, Chris.wpd

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69 Evansville to Indianapolis Study. This form is provided to allow you to give comments to INDOT and it consultants.

We have published for public comment a Draft Purpose and Need (P & N) Statement. This Purpose and Need Statement will become a chapter in the Draft Environmental Impact Statement (EIS) for this project, which will be published in 2001.

The Purpose and Need Statement is an important foundation of the EIS. It identifies the transportation, economic, and National I-69 needs in the project study area. It also proposes goals and evaluation criteria to identify how well alternative routes would satisfy those needs.

We invite your comments on the Draft Purpose and Need Statement.

PLEASE ENTER YOUR COMMENTS BELOW.

* At least 20 to 1 oppose @ public Hearing.
* Water Quality not even mentioned in Envir. Study 5.24
* At least 200 displaced long time residents (citizens)
* Thousands of Farmland acreage lost.
* Didn't mention the possibility of No Build → How convenient
* At least 400-500 people disgusted enough to come to a public Hearing. Some driving very far. Watch the tapes. This is sick how grossly disputed this subject is. How much wasted $ is the O'Bannon administration going to dispearse to unfair committees of Special interests when public opinion is so clear. The people of southern IN especially those in Bloomington will fight this to the end. ~~to end~~ The people not politicians Meanwhile Our children lack the necessary funding of programs & materials so money shifts blindly through hands

Name: Shane Hutte

Address: 1339 S. Poe Dr.
Jonesboro, IN 46938

Date: 9.16

0916-019

Fold to address on other side, staple, and mail.

Robert Henderson
4850 W. Evans Road
Bloomington, IN 47403
(812) 824-7997
email: robh@cs.indiana.edu

Michael Grovak, Project Manager
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, IN 47715

Dear Mr. Grovak,

I am writing to express my concern over failures of the INDOT Tier 1 Draft Environmental Impact Statement to identify key karst features in the section of route 3C through Monroe County. Specifically, the West Evans Road/Lodge Road/Rockport Road region of Indian Cre Township in Monroe county that would be directly in the path of route 3C. These features include:

1) A large cave just west of Lodge Road is not identified on the INDOT maps. This cave appears to be very close to, if not directly in the path of, proposed route 3C. I have personally explored this cave on many occasions and have frequently seen bats roosting in the cave,

2) Another cave slightly further to the west is also not identified on the INDOT maps. This cave appears to run directly under a section of proposed route 3C. Even though this cave is large enough to enter, there is a spring that keeps it partially full of water, making exploration difficult. However, the presence of large numbers of bats in the area around the mouth of the cave would lead one to believe this is a likely bat habitat area. 5.24

3) There is a large band of sink holes in the area that traverse the proposed path of route 3C. While some of the sink holes in this area are identified on the INDOT maps, many others are not. This area has extremely complex karst topology and I fear your study has not properly identified the extent of these features and the potential damage to the area drinking water.

As a result of these shortcomings in the Tier 1 Draft Environmental Impact Statement, I must express my strong objection to the routing of I-69 following alternative route 3C. I urge you to select the lowest cost and least environmentally damaging I-70/US41 route.

Sincerely,

Robert Henderson

I107-691

Subj: DEIS Comments
Date: 10/6/02 1:46:05 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Dawn Hewitt
Address = 1261 N. Lindbergh Dr.
City = Bloomington
State = IN
ZIP = IN 47404
Email = hewitt@earth-maker.com
Message = Alternative 3B, as it passes through western Monroe County and crosses Ind. 48, also passes through David Porter's composting facility, farm and forest. Porter's woodland is riddled with sink holes and cave openings, which do not appear on your detail photos. 5.24

Porter owns approximately 200 acres just west of Vernal Pike, and north of Ind. 48. I-69 cuts through his property, yet this large area of visible visible karst is not identified on your map. This is an egregious and serious omission.

On the detail map, the interchange of I-69 and Ind. 48 lies right on top of Porter's historic farmhouse. To the north of the farmhouse, 100 sinkholes or more fall directly under or within 1,000 yards of the proposed route. 5.24

Why was this area not assessed for karst? Are other major karst locations omitted from the alternatives?

That karst areas were omitted from the draft Environmental Impact Statement is inexcusable incompetence, and must be addressed immediately.

1006-009 Hewitt, Dawn.wpd

541 N. Woodlawn Ave
Greene, rm 117
Bloominton, IN 47406

October 10th 2002

Michael Grovak:

As an Indiana resident of Monroe county, I am very concerned over many of the impacts of the five "preferred" routes vs. the I-70/US 41 Common Sense route.

First and foremost, the impact of urban sprawl. Urban sprawl not only decreases the quality of life and development of community, but deepens America's reliance on oil. When places of business, schools, etc, are so far away from places of residence that residence have no choice but to use their cars, our dependence to the middle east deepens. It is obvious in today's political climate that such reliance is not desirable.

Secondly, as a member of the Indiana University Spelunking Club, I am troubled by the consumption of karst land not only affected by the highway itself, but by the aforementioned sprall. Highway runoff will also cause catastrophic damage to karst land ecosystems and affect drinking water. 5.24

The Draft EIS underestimates the presence of springs on the proposed routes; landowners confirm the existence of springs in those corridors. Landowners have also pointed out to INDOT the existence of eaves in proposed corridors that INDOT was unaware of. These are indications that the karst portion of the Draft EIS is clearly incomplete. The Draft EIS is also silent on how damage to karst areas will be mitigated or reduced both during and after construction. 5.24

In addition, the Draft EIS shows that the Common Sense I-70/US 41 route, compared to the five "preferred" routes will save;

- nearly 5,000 acres of farmland, of which over 3,500 acres is prime farmland;
- over 1,000 acres of forest;
- the Patoka National Wildlife Refuge. 4 of the 5 "preferred" routes would cut through the Refuge, home to several threatened and endangered species like the Bald Eagle;
- the fourth largest Old Order Amish settlement in Indiana. 4 of the 5 "preferred" routes threaten this settlement in Daviess County.

As for the fiscal impacts, the Draft EIS also shows that the I-70/IJS 41 route would save nearly $600 million when compared to the five "preferred" routes. And this comes at a time when Indiana is experiencing one of the worst budget crises in state history. A dollar wasted on a new-terrain I-69 is a dollar that could otherwise be spent on other, more deserving transportation projects like road maintenance, mass transit or rail.

In conclusion, I, my friends, and as I understand it almost a 100% of the residents of the Collins Living Learning Center oppose the "preferred" options. I thank you for your time and attention.

Sincerely,

-Eric Scott, voter.

1010-005

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

I'M NOT SURE WHO PUT THE DEIS MAPS TOGETHER. THEY OBVIOUSLY DID NOT SPEND AS MUCH TIME REVIEWING THESE PROPOSED AREAS. I WAS ASKED TO LOOK THEM OVER FOR KARST MARKINGS BY A NEIGHBOR BECAUSE HE KNEW I CAVED AND BELONGED TO THE NSS. AT LEAST 50% OF THE KARST GEOLOGY WASN'T EVEN MARKED. THE STUDY CLAIMED THERE ~~WHERE~~ WERE NO CAVES WITHIN THE CORRIDOR. THAT IS PURE LIES. I'VE BEEN UNDERGROUND IN THIS AREA, NOT ONE SPRING WAS MARKED ON THE MAP. THERE ARE AT LEAST 5 WITHIN 1 MILE OF MY HOUSE (INCLUDING OWEN COUNTY'S BIGGEST. NOT TO MENTION BALD EAGLES ARE SPOTTED OFTEN ON MY ROAD. (NO MENTION OF THAT ON THE MAP). WHERE IS MY TAX MONEY GOING ? ? ? ? ? !!! 5.24

Name TY SPATTA

Address RR 2 Box 719

City/State/Zip SPENCER, IN 47460

1028-040

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 - 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for your interest in the I-69, Evansville to Indianapolis Study. This form is provided for your comments on the Draft Environmental Impact Statement (DEIS). These public hearings are provided to present the results of the DEIS, as well as to solicit comments on the DEIS.

The DEIS is a detailed study of alternative corridors for I-69 between Evansville and Indianapolis. It presents each alternative's impact on the natural and socio-economic environment, as well as its cost and performance on project goals.

PLEASE ENTER YOUR COMMENTS BELOW.

Your maps of routes 2 & 4 failed to identify extensive areas of sink holes. Our farm has at least a dozen sink holes on it & your highway goes right through our farm but you don't even know there are sink holes there. How much taxpayer's money did you waste on this, yet again, inaccurate, biased, piece of crap study??

The only acceptable route in terms of impact on natural & socio-economic environment is no-build or US 41/I-70 5.24

1104-140

Name Rosemary King

Address Rt 1 Box 1075

City/State/Zip Freedom, IN 47431

RECEIVED
NOV - 4 2002
SLA

Michael Grovak, Project Manager
Bernardin, Lochmueller & Associates
6200 Vogel Road
Evansville, IN 47715

5 November 2002

Dear Sir

Enclosed is a report and maps pertaining to the proposed routing and construction of an interstate highway through parts of Monroe and Greene Counties in Indiana. These materials are provided with the hope that they will be diligently reviewed prior to further decisions pertaining to the I69 project. My expertise on this matter is based on nearly 40 years of cave and karst related research projects and 9 ½ years experience with highway construction practices and highway materials testing. 5.24

Sincerely

Samuel S. Frushour

Samuel S. Frushour
513 W. Dixie Street
Bloomington, IN 47403

812-855-3596
812-339-2130
Frushour@indiana.edu

1105-200

Significance of Karst Features in Greene and Monroe Counties

Scope and Intent of This Report

This report is the result of recent field observations to determine the extent of karstification in Eastern Greene County and parts of Monroe County where proposed interstate highway construction may occur. Field observations were accomplished at selected sites that were available for inspection by the consent of landowners. Observations were made within the proposed highway corridors or nearby. The information collected was added to existing data on topographic maps. Karst features added were caves, sinkholes, springs, and swollowholes. The purpose of compiling these maps is to illustrate that the degree of development and density of karst features is far more extensive than can be determined by studying USGS 7 ½ minute topographic maps, aerial photographs and karst information supplied by the Indiana Geological Survey via GIS coverage.

The GIS coverage provided to Bernardin, Lochmueller and Associates, by the Indiana Geological Survey, was created in 1997 by Richard L. Powell and was not intended to be all inclusive of karst in the Mitchell Plain or the Crawford Upland. This GIS coverage inadequately illustrates the degree of karst development in southern Indiana as is shown by the enclosed maps. The author of this report was coauthor of the map produced by the Indiana Geological Survey (Miscellaneous Map #65) that the karst GIS coverage was created from. 5.24

This report does not attempt to enumerate all karst features in the study area but sufficient numbers of them to demonstrate that enough karst and related subsurface drainage features exist to warrant close scrutiny pertaining to the advisability of construction of a proposed interstate highway in Monroe and eastern Greene Counties.

The Principle Study Area (The Crawford Upland)

The Crawford Upland (see enclosed physiographic map of Indiana) is dominated by ridges composed of middle and late Mississippian Age bedrock that is mostly soluble limestone and dolomite. The upper ten to thirty feet of the high ridges have a cap of Pennsylvanian Age sandstone (Mansfield Formation). Just below this rock formation is about 70 feet of alternating shales, limestones and sandstone of the West Baden Group (see enclosed stratigraphic chart) and below that are thick limestones of the Blue River Group. The sandstone on ridges collects precipitation and directs it downward or onto the flanks of the ridges where moisture sinks into the soil and sinkholes to be channeled into the underlying soluble limestone. Solutional enlargement of fractures and development of underground drainage networks is the result. The upper surface of the soluble bedrock, where sandstone has eroded away, is typically uneven and exhibits soil filled crevices that may channel soil into underground conduits and enlarged fractures. The upper 10 to 30 feet of soluble bedrock is most susceptible to solution by ground water recently charged with carbon dioxide from the overlying soil and the atmosphere.

Precipitation falling into normally dry valleys also infiltrates into the underground drainage via fractures and conduits. Eventually moisture reappears on the surface of the ground as springs. Many springs are at the head of valleys where spring water sinks into the valley floor and reappears as springs at the base of ridges or near base level streams. The floors of many valleys in this region are above base level of the few surface streams. These valleys exhibit sinkhole development as well but agricultural practices, crop farming and sinkhole filling, have obscured numerous sinkholes.

Results of Field Observations

The study area was in eastern Greene County and Monroe County. This included a portion of the Crawford Upland adjoining Neal's Landfill in Monroe County and a small part of the Mitchell Plain located south of Bloomington. Five days were spent in direct field observation of sinkholes, springs, swollowholes and caves. The object was to learn the extent that karst features have developed in the study area. Of the karst features located and placed on maps, only a couple of the sinkholes and none of the springs or caves could be observed on USGS topographic maps.

Springs, sinkholes, swollowholes, and caves (see enclosed copies of topographic maps) are indicators that significant underground drainage is occurring and that the bedrock is significantly altered by solution. These features adversely affect construction. Some examples of increased cost due to karst features are State Road 135 south of Corydon, State Road 37 between road US 50 south of Bedford and Mitchell, and the south bound exit ramp of State road 37 at State Road 45 in Bloomington. During field investigations, the number of karst features encountered, and previously unknown to the author, is as follows... 5.24

86 sinkholes or groups of sinkholes
5 sinkholes with swollowholes in them
22 springs
9 caves

Conclusion

The areas investigated represent only a limited sampling of terrain in the region that will have karst features or is susceptible to karst development. Observation in more of this region would reveal large numbers of additional karst features. Cracks and crevices below surface karst features are often not discernable until uncovered during construction. Sinkholes and subsidence may also develop post construction where rock crevices and rock voids may not be found during planning and construction Prudence dictates the need for a great deal more investigation of karst in the proposed construction corridors. From an economic standpoint, the avoidance of karst regions for major construction projects is justified on the basis of greatly increased construction costs. 5.24

Respectfully submitted by...

Samuel S. Frushour
513 W. Dixie Street
Bloomington, IN 47403
812-855-3596
812-339-2130

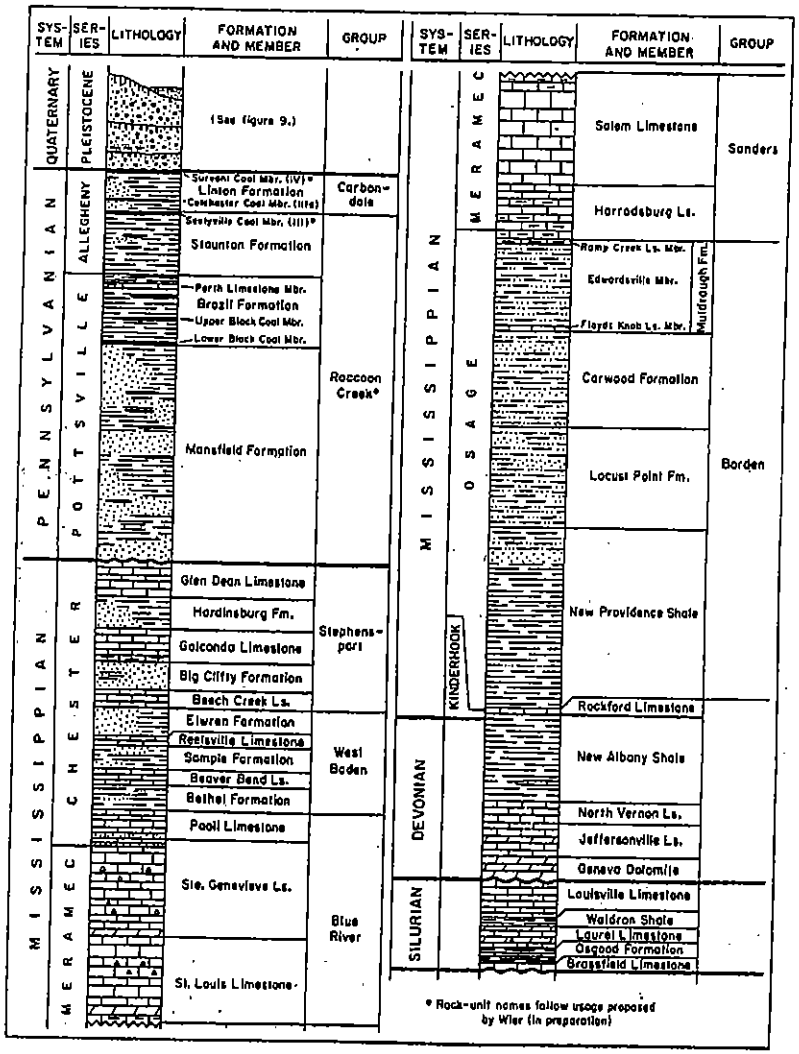
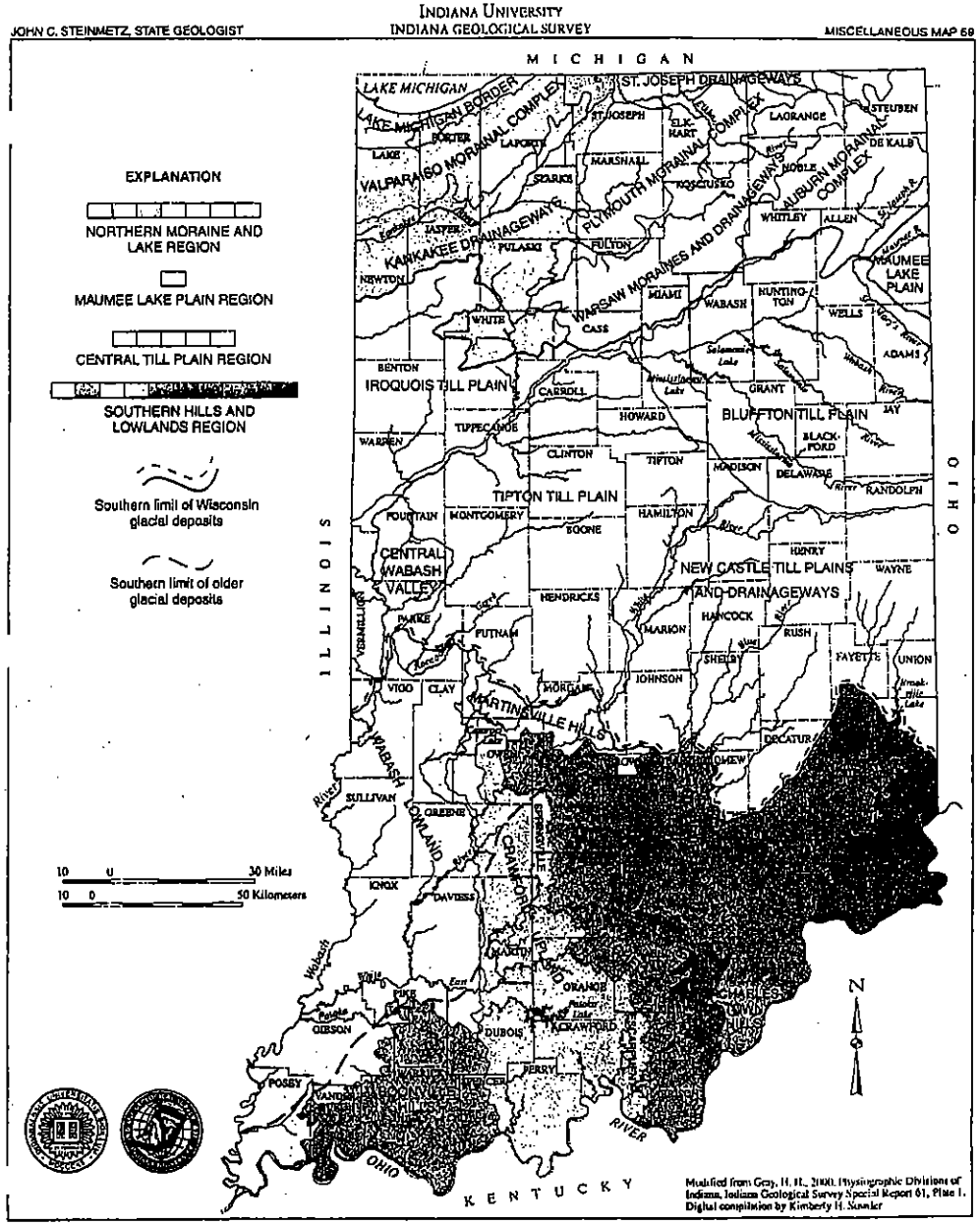


Figure 2. Columnar section showing outcropping rocks in the area of the field excursions. Vertical scale approximately 1 inch to 85 feet.



MAP OF INDIANA SHOWING PHYSIOGRAPHIC DIVISIONS
By Henry H. Gray
2001

PUBLIC HEARING COMMENTS

Sam Flenner... Sam Flenner from Indianapolis. First of all it's pretty good trip out here. There wasn't a lot of time after the environmental impact statement for average citizens that have to work for a living to put together something that would be very rational and I would respectfully request that more public hearings be scheduled and they be scheduled in better locations and they be as a result we average citizens who have to work for a living might be able to come up with a much more detailed and better information. I have a quote from the Indianapolis news when it was in business, it talked about how the Davies and Greene County residents want to preserve their way of life in that region and how the EIS itself talks as if the people of that region are clammering for this highway, that is a distorted version of the truth quote unquote. But the reality is that many folks in that area are appreciative of their rural heritage and are opposed of the new interstate as much as their Amish neighbors and I do have a copy of the Amish petition, these people don't petition but if you start that highway up anywhere other than US 41 your going to cut them in half, you're going to go through the Patoka River National Wildlife Refuge, you're water is of poor quality and at high risk in southern Indiana so any population growth in that area will be at risk of even destroying their water supplies even more especially with the water standards that came out of our water pollution control board. So the human impacts are much deeper than just a couple homes and businesses over and above anyone else. Also the maps out there don't show Hoops Nobs and Sams Creek in the Hoosier National Forest, and the sprawl that can come out beyond the two miles will certainly there will be fewer, more species that are threatened or endangered than are presently that our children will not be able to experience because that highway went straight up their path. And so US 41, 70 is really the only route.....(Time ran out) 5.24

0819-044 Flenner, Sam.wpd

Michael Grovak, Project Manager
Bernardin, Lochmueller & Associates
6200 Vogel Rd.
Evansville, IN 47715

Dear Mr. Grovak,
I favor the US 41 to I-70 upgrade for the new I-69 route for the following reasons:

1) Your "Purpose and Needs" analysis is flawed. What you call "Economic Development" I call "Urban Sprawl". To bring all those poor neglected people who moved to the country to escape Urban Sprawl within fewer hours of that sprawl is not good. It is worth 12 extra minutes from Indianapolis to Evansville to save our farmers and Amish from Urban Sprawl. If someone wants to get closer to Indianapolis, they can move to Indianapolis. Can't you leave Indiana's farms, forests, and wetlands alone? Your proposal will only replace peace and tranquility with sprawl.

2) We need not spend $600 million tax dollars more than needed to build an interstate that will cost 8 times more to maintain than the 41/70 option. My gas taxes need to maintain existing state highways. I do not want to add a totally new route to my tax bill.

3) Your secrecy breeches public trust. Your actions lend credibility to allegations that you scheme to leave pertinent information out of the publics grasp. The details left at Bernardin , Lochmueller, and Associates needs to be sent to INDOT and made public. The Comment period needs to be extended to give ample time for public review and you need to "...go well beyond the requirements of the law in engaging and informing affected communities and landowners about potential routes." (Lugar, 10/23/02)

4) Your analysis of threatened species does not even begin to address the impact of sprawl on nature beyond the 2 mile study corridor. If a new terrain is built land speculators will soon give us an answer. We do not want to find out because then it is too late.

5) With water pollution standards as weak as they are in Indiana, I do not want to see industry invited to your "preferred routes." You cross too many streams and underground waterways. I do not believe you have researched thoroughly enough the potential for the degradation that will bring to our water. The groundwater along the "preferred routes" are known to be among the most threatened in the State (Groundwater: Indiana's Unseen Resource, Sponsored by Hoosier Environmental Council, 1987). The 41/70 route has no sinkholes thereby clearly making it much more likely to protect groundwater, even when industry locates nearby. 5.24

6) Indiana citizens did not support the Patoka River Wildlife Refuge only to see it split in two.

7) The Amish should be left undisturbed. Between the Patoka River Wildlife Refuge and the Amish Community alone 4 of your 5 preferred routes from the south should be removed as options.

8) The difference in travel time that you value so highly is inconsequential. I have spoken with truckers who have said that they prefer straight and flat as opposed to the winding and hills that any new-terrain option would impose.

I only wish that I had the time and resources to be more specific on a route by route basis. Your decision to avoid sending crucial details of the study to INDOT for public access was a bad one. Please enter these comments in favor of full disclosure of all information needed for accurate review of the EIS; an extension of the comment period to allow for accurate review of that information; and add the US 41/I-70 alternative as a preferred route.

Respectfully,

Samuel E. Flenner III
2028 N. Berwick Av.
Indianapolis, IN 46222
317/464-0542

cc. Gov. Frank O'Bannon
IN Dept. of Transportation

1031-013

Subj: DEIS Comments
Date: 8/26/02 12:55:45 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Ronald & Linda Floyd
Address = RR 2, Box 147
City = Spencer
State = IN
ZIP = 47460
Email = floyd@bluemarble.net
Message = We would like to add to our previous comments about water quality in Owen County. You must realize the only area with water lines is in the area of Spencer. Everybody else uses wells and sewer drainage. What do you think this new highway will do to our wells/drinking water. Not a pretty picture, is it??? Would you want this to happen to your families???? 5.24

0826-011 Floyd, Ronald & Linda.wpd

Subj: DEIS Comments
Date: 11/6/02 9:31:29 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = John Braun
Address = 2780 Wicker Road
City = Indianapolis
State = IN
ZIP = 46217
Email = jjbraun2@juno.com
Message = Dear Mr. Grovek:
It seems to me that the Tier 1 DEIS Volume III Atlas summary, page number four(4) is flawed for alternatives 3Bc2, 4C2, 5B2. Under water quality impacts category, SUBJECTS: Water treatment facilities; Public Drinking Water Supply Sites; Public water supply wells; Wellhead Protection Areas; all show 0 under alternatives 3, 4, and 5. State Road 37 from Fairview Road on the south to at least southport Road on the north is a wellhead protected district and has public drinking water supply sites, and water supply wells for those facilities sites located within the study area. There is an Indiana Water Company treatment facility at approx. Mt. Pleasant Road and Fairview Road and an Indianapolis Water Company treatment facility at approx. Southport and Tibbs. The largest aquifer in central Indiana lies beneath SR 37 surrounding those located water treatment facilities. If a toxic spill incident were to occur on any of these proposed routes of that area over this protected wellfield, wellhead areas and associated treatment facilities, most drinking water for the area could become contaminated. I urge you to have your staff review my comment at your earliest convenience. Bringing any potential I-69 route alternative up SR 37 over that aquifer is a very bad idea. 5.24
Thank You,
John Braun
2780 Wicker Road
Indianapolis, IN 46217

1106-020 Braun, John.wpd

8/16/02		Margaret Schattner 4010 Union St., Indianapolis, IN 46227-1402 I would like to comment on the environmental impact this could have in Indy and Perry Twp specifically. I don't know for sure if they plan to go thru Perry twp would go across the aquifer which is in Perry Twp and its part of the Indy water supply. My comment would be the more semi trucks that we get hauling hazardous materials toward the aquifer, if this is the way it's going to be. My thought would be that trucks if there are accidents that could contaminate our water supply which would be a terrible thing for the City of Indianapolis. The City now owns the water supply. If you haven't considered this, you should. If you would like to call me about this, I cannot attend the meetings, they are too far away for me. My telephone number is 317 786 4442. Thank you for the time you have given me. Bye, bye. 5.24

0816-010 Schattner, Margaret.wpd

Subj: DEIS Comments
Date: 8/18/02 10:42:35 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Ike Standifird
Address = 2112 Monroe Ave
City = Evansville
State = IN
ZIP = 47714-3041
Email = ikest@yahoo.com
Message = My interests in I-69 routing are primarily to making access from Southwestern Indiana to Indianapolis and Bloomington, faster and safer.

I could write a very long essay discussing the benefits of a direct route for I-69 from Indianapolis to Evansville, but I will focus on two issues that have not received a lot of press. At least that I am aware of.

1 - The environmental effect on our air of cars, trucks, buses, etc driving the longer distance on a route that goes via Terre Haute. The Terre Haute advocates have underestimated the longer drive times, especially if you take into consideration the certain delays on an already overcrowded I-70. Even with the addition of a third lane, bad weather and accidents will cause long delays, increasing drive times and consumption of gasoline/diesel fuel thus increasing air pollution and our dependency on Middle East oil. I drive a lot and have an estimated 1.5 million miles behind the wheel and in my estimation I-70 needs a third lane if no additional traffic is added. 5.27

2 - How about we consider the human environmental impact on residents of Southwestern Indiana. In addition to the easier cheaper drive to our state capital, we need better access to our flagship state University, IU. My family has suffered the agony of worry about a child coming home from school for a visit and returning. Usually at night, on dark narrow twisting roads. Add rainy and/or winter conditions and it adds up to Four to five hours of agonizing worry for parents and other family members. We were lucky but know of others not so lucky.
In addition, we would all benefit if our children and grandchildren attended IU instead of an out of state or lesser in-state institution, easier access should facilitate that. And let's not forget the value of easier access for advanced studies by adult students.

Thank you.

Ike Standifird

0818-008 Standifird, Ike.wpd

Subj: New I-69 Study Form Feedback
Date: 8/4/02 10:50:32 AM EST
From: jla1029@aol.com (James Atkisson)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

James Atkisson
5715 Mornay Pl.
Indianapolis, IN 46254

Message:
It is my opinion that the best route for I69 is the proposed IN37 route. This will not only give the most direct route from Indianapolis to Evansville, but will also provide better access to IU-Bloomington from both cities.

The time saved by using the most direct route translates into more savings in gasoline and diesel useage. Thus, becoming an environmental advantage over the years; overcoming any environmental disadvantage of requiring new terrain in its construction. 5.27

Sincerely,
James Atkisson, Indianapolis

0804-001 Atkisson, James.wpd

The I-69 fiasco and reason number 16 why it should not be built:

Since INDOT seems hell-bent on building a new terrain highway no matter what the economic, resource, and human cost might be. I have undertaken a letter writing campaign to inform INDOT of their inherent ignorance of numerous points. I am writing this series of letters as a matter of formal public comment, and I fully expect INDOT to include this in their EIS and actually read and consider the points being made.

A sixteenth reason why a new terrain I-69 cannot be built is the lack of long-range planning associated with a form of infrastructure so totally dependent upon fossil fuels. It is an indisputable fact that fossil fuels – especially oil – are in quite limited supply. At the current rate of consumption, world oil reserves will probably be exhausted in the coming century, and the rate of consumption will probably increase exponentially. Consequently, for a highway project to be considered a long-term project, planning should take into account that the only current method of utilizing a new interstate highway is completely dependent upon a scarce resource that will be mostly exhausted in the foreseeable future. 5.27

Barring a major leap in technology and national willpower to find alternative forms of energy, the rationale for building an interstate highway is based upon the underlying belief that the necessary fuel for utilizing this highway will be present indefinitely, which it will NOT. That being said, it continues to be irresponsible on the part of INDOT and BLA to promote an EIS that claims to have a long-term outlook with its modeling and planning. A model that attempts to predict future traffic patterns is not of much use if the primary source of fuel for that traffic has become so scarce as to increase its price and consequently decrease its use.

Additionally, the construction of a new road itself is heavily dependent upon fossil fuel-derived raw materials. The asphalt that makes up the highway, and all the fuel consumed by construction equipment is dependent upon this same limited supply of fossil fuels that traffic will be using to drive on this road.

All this being said, the FACT that oil-derived gasoline fuel is a nonrenewable resource and effectively the entire U.S. vehicle fleet depends upon it to function, INDOT and BLA need to address this point in any EIS that proposes building over 100 miles of new terrain interstate highway. To leave out the analysis of long-term availability of fuel supplies and the increasing cost of such supplies effectively negates the believability of any predictive traffic models that were utilized.

A new terrain highway is UNACCETABLE in southwestern Indiana. The only two acceptable alternatives are to not build it at all (preferable), or to upgrade US 41 / I-70.

Wayne Werne
RR 1 Box 254
Ferdinand, IN 47532

Wayne Werne

1028-037

VALLEY WATCH, Inc.
800 Adams Avenue • Evansville, IN 47713 • (812) 464-5663

November 5, 2002

Michael Grovak
Bernardin, Lochmueller & Associates, Inc.
6200 Vogel Road
Evansville, Indiana 47715

RE: I-69 EIS Comments

Dear Mr. Grovak:

I am writing to express our total dissatisfaction that the route which would basically follow the existing US 41 and I-70 was not chosen as one of the "preferred" routes for expansion of the highway through southwestern Indiana.

It is clear that this decision was based more on the instructions from Brian Nichol than on any real rationale for completing a highway that would serve to benefit the transportation needs of moving goods and people from Windsor, Ontario to northern Mexico. 6.2

We feel that the 41/70 route would serve that purpose better, utilizing less financial resources and have less environmental impact than any of the routes that you chose to call "preferred."

As a group that is dedicated to the "protection of the public health and environment" of the lower Ohio River Valley, we feel that the public has been served poorly by your failing to include the 41/70 route in its final list of "preferred" routes.

Thousands of people and organizations from across the state have spoken loudly that 41/70 is their preferred route but BL and INDOT have chosen to ignore those comments in favor of a route that is more costly and will serve private interests more than public interests. If this is the treatment that the public receives when they participate in the affairs of government, it is no wonder that so few people choose to participate.

Your decision has made a mockery of public participation in a democracy and your failure to understand that or care is reflective of a disregard for our very fragile democracy.

Sincerely,

John Blair, president

1105-207

November 3, 2002

Robert Dirks
Federal Highway Administration
575 North Pennsylvania Street, Room 254
Indianapolis, IN 46204

Dear Robert Dirks,

We know the debate over the construction and location of the I-69 highway between Evansville and Indianapolis has caught your attention. As you are in a position to influence the upcoming decision regarding I-69, we hope you use that clout to benefit the citizens of Indiana.

When we first reviewed the Draft Environmental Impact Statement, we tried to choose which of the designated "preferred" routes we would support. At the time, it seemed logical to support an alternative favored by the professionals involved in the preparation of the DEIS.

However, **those five preferred alternatives are not in the best interests of the state of Indiana and its residents.** These five routes will waste hundreds of millions of taxpayer dollars, devastate communities, and cause widespread and irreparable environmental damage. These "new terrain" routes enjoy their strongest support among Evansville leadership and in the highway lobby, the latter of which stands to lose hundreds of millions of dollars if the state decides to upgrade existing US 41 and I-70 rather than excavating southwest Indiana to build a new highway.

Indiana Department of Transportation's own study proves that Alternative 1, the US 41/I-70 route, is the least costly and least environmentally damaging route. This route will save hundreds of millions in scarce tax dollars and thousands of acres of farms, forest and wetlands. Thousands of citizens oppose new terrain routes for I-69 and support the US 41/I-70 route.

The preferred alternatives cost 16% to 88% more than US 41/I-70, yet none of the performance criteria measurements exceed an 8% difference. The preferred alternatives cost $600 million more, on average, than Alternative 1 - the state of Indiana does not have the extra revenue to throw at new construction – gasoline taxes have been raised this year to address what is already a shortfall in highway funds. Yet instead of analyzing how much Indiana can afford to pay for I-69, and comparing the costs to the claimed benefits, the DEIS virtually ignores cost considerations. 6.2

The preferred alternatives are far more environmentally destructive than US 41/I-70. One of INDOT's core principles is environmental protection – yet the DEIS only reports environmental impacts. Not factoring these impacts into their recommendation ignores their principle. A new-terrain I-69 would also destroy more farmland and woodland than any other project anywhere in Indiana. Our family farms and productive farmland are too important to pave over to save 10 or 12 minutes in travel time.

We strongly oppose building a new-terrain I-69 highway. Please support the fiscally and environmentally responsible US 41/I-70 route instead, and make this support known to Governor O'Bannon and the Indiana Department of Transportation.

Sincerely,

Desiree Handley, Ben Ratell, Jon Dye, and John Hoover
2730 Timberly Drive, Apt. 1C
Indianapolis, IN 46220
317.251.1995
dhandley@iupui.edu

1103-020

RESOLUTION NO. 2002-09

A RESOLUTION OF THE COUNTY COMMISSIONERS OF THE COUNTY OF SPENCER, INDIANA, REGARDING I-69

WHEREAS, the Indiana Department of Transportation (INDOT) has found it to be in the best interest of all residents of the State of Indiana to construct I-69 south of Indianapolis to and through the southwestern part of the state;

WHEREAS, INDOT has proposed several options and has held public hearings to receive public input with regards to the options;

WHEREAS, the construction of I-69 will enhance all aspects of transportation in the State of Indiana, including safety, an increase in the trade of goods, and economic development; and

WHEREAS, the County Commissioners of the County of Spencer, Indiana, have reviewed the possible route options and finds that one option would better serve the County of Spencer and its citizens.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNTY COMMISSIONERS OF THE COUNTY OF SPENCER, INDIANA, AS FOLLOWS:

Section I. That Alternative 3 as shown on the Proposed Route Map is the route that will have the greatest positive influence on increasing the safety of travel and providing for continued economic development in Spencer County, Crane Naval Base, and all counties along Alternative 3. That a copy of the Proposed Route Map is attached hereto as Exhibit "A". 6.2

Section II. That the Spencer County Commissioners fully endorse and support Alternative 3 and find it to be in the best interest of the citizens of Spencer County, Indiana.

Section III. This Resolution shall be in full force and effect from and of its date of adoption by the Spencer County Commissioners.

PASSED AND ADOPTED by the County Commissioners of Spencer County, Indiana, this 4 day of November, 2002.

SPENCER COUNTY COMMISSIONERS

Karen Pennington, President

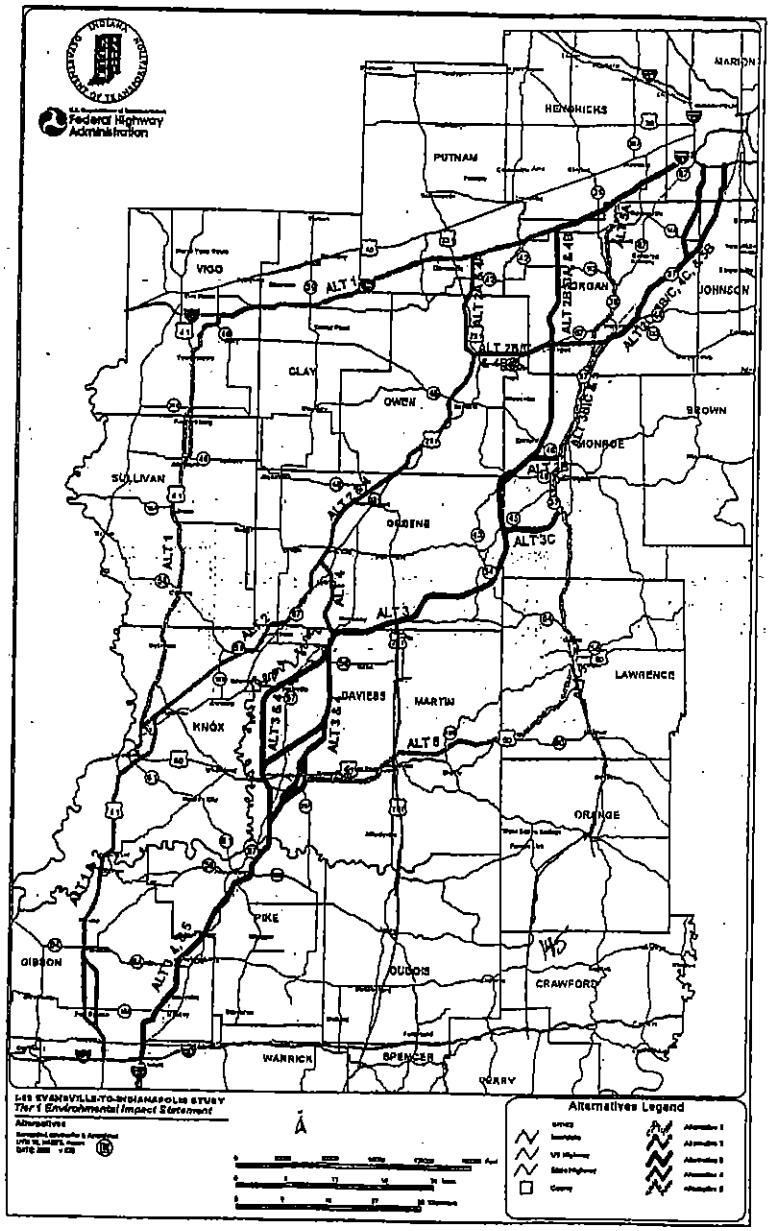
Dan Rininger

Chris E. Leibering

ATTEST:

Sara J. Arnold, Auditor

1105-208



http://

Baus@alumni.indiana.edu
(812) 339-1210
Submitted by E-mail, 7 November, 2002

I recommend Alternative 4C for the following reasons:

1. Alt. 4C is better than Alt. 1 and 5 because it is more direct. (Alt. 1 is almost the same as doing nothing.)

2. Alt. 4C is better than Alt. 3 and 5 because it crosses less karst terrain which is environmentally sensitive and difficult to build on.

4. Alt. 4C is better than Alt. 3 because it is not close to Bloomington. Bloomington is the focus of the opposition to I 69 and the majority of the people in Bloomington do not want it. Avoiding Bloomington will reduce the quantity and intensity of protests and legal challenges, thereby reducing the political and legal costs. The challenges and protests engendered by a route close to Bloomington would delay construction. 6.2

5. Alt. 4C is better than Alt. 4A, 4B, 2A, and 2B because it is more direct and comes close to Martinsville, whereas the others do not. It appears that there is widespread support for I 69 in Martinsville and most people there would support the highway if it were close.

6. Alt. 4C has the advantage of using the part of State Road 37 north of Martinsville. This section of highway will almost certainly be made limited access in the near future anyway.

Respectfully submitted,

J. William Baus
Attorney at Law

1107-318 Baus, William.wpd

Subj: DEIS Comments
Date: 11/3/02 9:21:56 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Joan (Stoelting) Morley
Address = 8311 Remington Drive
City = Evansville
State = IN
ZIP = 47711
Email = jqmjmm@sigecom.net
Message = Route 2 cuts a terrible diagonal swath across some of the best farmland in Knox County. It cuts off access to my farm and takes my farm house on Stoelting Road near Freelandville IN. I am for I-69 and want route 3 and 3B. 6,2

1103-013 Morley, Joan.wpd

Subj: DEIS Comments
Date: 11/4/02 5:00:35 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Larry Lawrence
Address = 302 Sugar Bush LN S
City = Brownsburg
State = IN
ZIP = 46112
Email = larrythelunch@go.com
Message = Dear INDOT,

Please do not run the I-69 ext. on the west side of White River along Mann Road coming off of I-465. This area includes Southwestway Park, which is one of the few places mountain bike riders are allowed to ride in Metro Indy. 6,2

It makes much more sense to go along the east side of White River since the Hwy. 37 corridor already exists.

Thank You,
Larry Lawrence

1104-020 Lawrence, Larry.wpd

Subj: DEIS Comments
Date: 11/4/02 1:17:03 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Robert E. Terrill
Address = 2212 East Arden Drive
City = Bloomington
State = IN
ZIP = 47401
Email = rterrill@indiana.edu
Message = Now that Sentor Lugar has come out in favor of the I-70/US-40 route, it would seem to me that is now the only politically viable option. 6.2

Now, it is true that Senator Lugar has not *explicitly* endorsed the I-70/US-40 route, but that is the only logical conclusion that can be reached following his letter asking that I-69 not run through his own family farm.

Senator Lugar is a compassionate and intelligent man, and he has been elected to represent our best interests. Clearly, he believes that I-69 should not go through family farms. There is only *one* route that minmizes encroachment on family farms. That is the I-70/US-40 route.

The only possible way to read that letter by Senator Lugar is as an endorsement of that route.

I, therefore, *heartily* stand behind Sentor Lugar's campaign in favor of the I-70/US-40 route.

I suggest that you do, too.

1104-013 Terrill, Robert.wpd

Subj: DEIS comments
Date: 11/7/02 1:15:18 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Charles
LastName = Judson
StreetAddress = 8521 Chickadee Dr.
Address =
City = Morgantown, IN
State = IN
ZipCode = 46160
Email = cjudson@indy.net
Comments =
07 Nov 2002

Dear Sir:

The connection of Alternative 3A at I-70 makes
it possible to further extend the interstate
system northward to I-74, I-65 and beyond, as
circumstances may dictate over the long-term.
Further, from a "people" perspective, this alternative is clearly less disruptive than others. 6.2

Alternative 3A is my choice. Thank you.

Charles Judson
8521 Chickadee Dr.
Morgantown, IN 46160

1107-033 Judson, Charles.wpd

INDIANA HARDWOOD LUMBERMEN'S ASSOCIATION, INC.

"Working to ensure a sustainable, affordable supply of quality North American hardwoods for the public good."

3600 Woodview Trace
Suite 305
Indianapolis, IN 46268
(800) 640-4452
(317) 875-3660
Fax: (317) 875-3661
E-mail: info@ihla.org
Web: http: www.ihla.org

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2nd Vice President
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BILL SHULL
BURCE URBAINS
JIM WALSH
JOHN WORLEY

INDIANA HARDWOOD LUMBERMEN'S ASSOCIATION

POSITION ON I-69 EXTENSION

The proposed higway, I-69 from Indianapolis to Evansville, will have a negative impact on forests in Indiana. Indiana was once 87% forested and now is only 20%. Urban sprawl, such as roads, highways, power lines, shopping malls and the house in the woods, continues to reduce acreage of our state's forests. The proposed new terrain routes, if constructed, would eliminate or dissect thousands of acres of private forestland, and would have a deteriorating effect on the environment and the state's forestland base than other proposed routes and at a much higher cost to the state.

Since 1897, the Indiana Hardwood Lumbermen's Association (IHLA) has been the voice of Indiana's forest products industry, and the association's mission is to "ensure a sustainable, affordable supply of quality North American hardwoods for the public good." IHLA represents the state's fifth largest industry, and shares concern for this issue with environmental groups in recognizing that forests can contribute much to society. Both the forest products industry and environmental groups recognize that forests are renewable resources which can sustainably produce fine forest products, wildlife habitat, recreation opportunities, and provide watershed and clean air for all citizens.

Due to unique climate conditions and soils, Indiana's forests grow some of the most valuable hardwoods in the world, from species such as American Black Walnut, White Oak, Hard Maple, and Cherry. However, these forests can give nothing back if paved with concrete. As one forester recently described, "When a landowner sells timber, some of the mature trees are removed, but the rest of the forest responds quickly to openings and soon becomes a mature forest again. However, if the forest is completely cleared, it's terminal—no more trees!"

1024-040

Ray H. Moistner, *Executive Director*

Indiana Hardwood Lumbermen's Association strongly urges the Indiana Department of Transportation to carefully reconsider its alternatives for highway routes from Indianapolis to Evansville and to select a route that has the least impact on Indiana's forestland base. The US 41 and I-70 route, with its existing roadbed and right-of-way, would cause the least impact and would be the most cost-effective. 6.2

In the name of wise land use and fiscally-responsible government, the US 41 and I-70 route should be strongly reconsidered.

Sincerely,

Ray H. Moistner
Indiana Hardwood Lumbermens Assn.
(317) 875-3660

John Brown
Honorary Director, IHLA
Pike Lumber Company
(547) 893-4511

-496-

SPENCER COUNTY REGIONAL CHAMBER OF COMMERCE

FAX

Date: 11-4-02

Number of pages including cover sheet: 2

To: Bryan Nicol

Phone:

Fax phone:

CC:

From: Gene Steinkamp

Phone:

Fax phone:

REMARKS: ☐ Urgent ☐ For your review ☐ Reply ASAP ☐ Please comment

Bryan. - Just trying to help. I hope that the coming Holiday Season helps carry you through these difficult decisions. Thanks.

Gene Steinkamp.

1104-058

SPENCER COUNTY REGIONAL CHAMBER OF COMMERCE
508 MAIN STREET
ROCKPORT, INDIANA 47635
PHONE: 812/649-2186
FAX: 812/649-2246
www.spencercoin.org

November 4, 2002

Dear Commissioner Nicol:

It is my intention to document the I-69 route most preferred by the Spencer County Regional Chamber of Commerce. We seek a route that most efficiently and effectively connects to Highway 231. We also understand the critical importance of Crane Naval Depot to Southern Indiana. We feel that Routes # 3 best fill this Region's needs. 6.2

We feel that the development of this Region will be the cornerstone of prosperity for Southern Indiana in this coming century, and nothing will further it more than good connectivity to I-69. Thank you.

Sincerely

Gene Steinkamp

Gene Steinkamp
Chair of the Board.

I-69 resolution draws mostly, but not total, support

By BILL POWELL
Herald Staff Writer

HUNTINGBURG — It was a show of solidarity — flecked by dissent — when Dubois County's city, county and town officials gathered at City Hall here Friday with other elected representatives from across the region to support bringing an extension of Interstate 69 to the area.

Elected officials from Jasper, Huntingburg, Holland, Linton, Loogootee, Rockport, Petersburg and Washington were present, along with Dubois County's commissioners and members of the county council.

With more than 40 people present in the gallery, attendees waited to sign a resolution expressing this area's need for the economic development the new interstate highway would bring to communities.

The resolution said a direct route between Evansville and Indianapolis "will enhance all aspects of transportation in the state of Indiana, including allowing for an increase in the trade of goods, safety and economic development."

The option endorsed and supported in the resolution is Alternative 3, which follows the State Road 57 corridor from Evansville to Washington before making its way toward the Bloomington area.

The resolution stated that Alternative 3 "will have the greatest positive influence on increasing the safety of travel and providing for continued economic development in Dubois County, Crane Naval Base and all counties" along its path.

Marvin Boeglin, Huntingburg's councilman-at-large, cast the lone opposition vote when the council moved to pass the resolution.

Boeglin cited from a packet of materials addressed to Huntingburg's council from Andrew Ruff, the Bloomington City Council's member-at-large. It included correspondence to the governor signed by seven of nine Bloomington council members indicating it would be better and more fiscally responsible for Interstate 69 to follow an upgraded I-70/U.S. 41 route from Terre Haute to Evansville.

Dr. Michael Ruff, a Jasper pediatrician who is Andrew Ruff's brother, attended Friday's event to support just such an alternative. He said, based on Indiana Department of Transportation data, the preferred routes for I-69 would cost about $600 million more to construct than an I-70/U.S.41 upgrade, which has been classified as a non-preferred alternative.

Both Boeglin and Dr. Ruff made the point that the expense of a "new terrain" Interstate 69 would drain a limited pool of funds at a time when the state is in a budget crisis.

Boeglin indicated the extra tax money it would take to build a new-terrain Interstate 69 would be better spent on the upkeep of existing roadways. He said when he asks why I-64 is in poor repair between Huntingburg and Louisville the official answer is that it is due to a lack of money. "Where on earth are we going to get this money?" he asked. "This really upsets me."

Among Dr. Ruff's points was that the difference in cost between an I-70/U.S. 41 upgrade and a new-terrain route could be better spent on public education. He said doing so would give each of Indiana's 293 school districts an additional $3.5 million. "These kids are what our future's all about," he said.

Many of the mayors who had spoken in support of the resolution were quick to rise again and disagree with the dissenters' facts, figures and opinions.

Paul Tedesco, development director of the Evansville-based advocacy group called Voices for I-69, as well as the transportation director for the Bloomington Chamber of Commerce, repeatedly took Ruff to task. Tedesco even provided a news release explaining how national special-interest organizations have "mounted a concerted effort to undermine and discredit" INDOT's work and the public information-gathering process for the project.

Tedesco said INDOT's draft environmental impact statement states that upgrading U.S. 41 would cost between $805 million and $1.056 billion, with an I-70 upgrade costing an additional $400 million. He said there is no such thing as a "new terrain" alternative because all routes studied — U.S. 41/I-70 included — would use new terrain to some degree and would use existing roads — including State Road 37 and State Road 57 — to some extent.

Tom Thacker, president of the Holland Town Council, said he understood Boeglin and Ruff's point. But, when he looks at the trouble being experienced within Dubois County's wood furniture industry, he worries about the future. A U.S.41/I-70 upgrade may be less expensive, Thacker indicated, but it will not help the local area.

Tedesco told the gathering to not be "mislead by these constant mantras of 'new terrain' or 'the cheaper route' of a highway situated out there by the banks of the Wabash that is really something more of an Illinois thing than an Indiana thing.

"We need to start taking care of business down here in southwestern Indiana. We've been neglected for too long in this part of the state."

Going into Friday's event, Boeglin said he had been under the impression that others present would agree with his position. "When you get in a place like this," he said, "people will vote for things because they look at their friends."

Kemp said Friday's event was significant because, in a bi-partisan effort, so many came together to stand behind something for the good of the area.

A final route alternative is expected to be selected for detailed design in December.

Weekend

Two Sections
Five Supplements
Volume 108, Number 23

■ PUBLISHED IN JASPER, INDIANA

Weather

Lows in the mid-30s tonight. Highs in the upper 40s Sunday, with a 50 percent chance of rain. Highs in the low 50s Monday.

A five-day forecast, map and more information are on Page 5.

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Weekend Report

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SATURDAY, NOVEMBER 2, 2002
THE HERALD

I-69 resolution draws mostly, but not total, support

By BILL POWELL
Herald Staff Writer

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Angie's MAC: Date: 11-6-02 NOTE: 2

Huntingburg Leads I-69 Resolution Charge

By Angie McDonald

Elected officials from around southwestern Indiana converged on Huntingburg City Hall last week to throw their support behind one of three I-69 route alternatives still being considered by the Indiana Department of Transportation.

Huntingburg Mayor Gail Kemp invited mayors from outside Dubois County as well as officials from within Dubois County to sign a resolution last Friday in favor of Alternative 3, which proposes routing the new highway north from Evansville to Washington along State Road 57, and then northeast of Crane Naval Base and west of Bloomington before intersecting with I-70 just west of Indianapolis.

Those who came to sign the resolution first voiced their endorsement of Alternative 3 one by one, including Dubois County Commissioner Leon Fleck, Dubois County Council President Rich Eckerle, Mayor Bill Schmitt of Jasper, and Town President Tom Thacker of Holland. Also speaking in favor of Alternative 3 were the southwestern Indiana mayors of Linton, Loogootee, Petersburg, Rockport, and Washington, as well as Paul Tedesco of the Evansville-based Voices for I-69.

Passed 4-1 by the Huntingburg Common Council during the special noon-hour meeting, the resolution expresses a consensus that Alternative 3 provides the best option for increased safety of travel as well as enhancing economic development in all areas along the proposed route.

"This is a clear statement that can be heard at INDOT," stated Huntingburg Mayor Gail Kemp. "This is something that does have bipartisan support in Dubois County."

Also signing the resolution were Dubois County Commissioners Jim Kemper and Larry Vollmer as well as Dubois County Councilmember John Burger.

Lone Huntingburg dissenter Marvin Boeglin spoke against Alternative 3 and for Alternative 1, now a non-preferred alternative shelved by INDOT that had proposed routing the new highway up U. S. 41 to Terre Haute from Evansville and then east at I-70.

Lobbying heavily in favor of Alternative I have been a contingent of other Indiana cities and counties, including Bloomington, Terre Haute, and West Lafayette; and Vigo, Hendricks, and Benton counties, which Boeglin referred to in his remarks before the Common Council vote.

Pediatrician Dr. Michael Ruff stood up and spoke out against Alternative 3, pointing out its environmental impacts and cost as cited in the project's Draft Environmental Impact Statement. He also expressed concern over Alternative 3's negative impact on many of his Martin and Daviess County patients, and questioned the justification for spending what would have to be spent on Alternative 3 as opposed to Alternative 1, which he favors.

Public comment on the project will close tomorrow, November 7, with a final decision on the preferred alternative expected in December.

I-69 Public Hearings
Draft Environmental Impact Statement
August 19 – 21, 2002

Indiana Department of Transportation
I-69 Evansville to Indianapolis
Tier 1 Environmental Impact Statement (EIS)

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the proposed alternative corridors for I-69 between Evansville and Indianapolis. Although we are residents of Indianapolis without the need for frequent business or personal travel to Evansville, we do recognize the many advantages in developing a rapid-transit corridor to the southwestern part of Indiana. Nonetheless, as taxpayers, **we urge that the most cost-effective solution be chosen** considering all attributes for each alternative. We believe the highest-performing solutions should not be chosen if they are significantly more expensive than other solutions that reasonably satisfy project goals.

Based on the data presented in the DEIS Summary, we believe Alternative 4C (Evansville-Washington-Spencer-Martinsville-SR37) is the most cost-effective choice, for the following reasons:

- Achieves "high" performance for seven project goals and "medium" for the remaining two goals
- Has **nearly 20% lower capital costs** than two other alternatives (3B and 3C) that are only slightly higher in performance toward project goals 6.2
- Significantly outperforms the remaining two "preferred" alternatives (2B and 4B) that have lower capital costs
- Provides significant improvement in access to Bloomington and Crane Naval Surface Warfare Center by providing Interstate service within 10-15 miles of each location, at significantly lower costs than Alternatives 3B and 3C which provide closer Interstate connections but save only a few minutes of total travel time

Sincerely,

Dan Shields Mary Ann Shields

Name: Dan and Mary Ann Shields
Address: 7134 Fremont Court
Indianapolis, IN 46256-2280

To be submitted to: Michael Grovak
Bernardin, Lochmuller & Associates
6200 Vogel Rd.
Evansville, IN 47715

1014-009

Subj: New I-69 Study Form Feedback
Date: 10/20/02 11:50:19 AM EST
From: swphoto800@aol.com (Steve L. Wilson)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Steve L. Wilson
46 E Court Street
Paoli, IN 47454

Message:
To all Hoosiers & state officials,

RE: I-69

A State that is not building roads, is a state that is not planing for its children_s future. When it comes to planning for the future, Indiana is one of the most backward states in the union. I-69 protesters are proof of that, many of these folks would have you believe that upgrading SR 41 to an interstate would be the better choice that would not break up farms or communities along new proposed route. This is poppy cock! An interstate is a limited access highway, is a limited access highway. By making I-41 limited access, you end with the same results as putting the highway somewhere new. In fact, in many ways it is much worse as homes, family, friends, businesses and farms already heavily concentrated along 41 with already heavily concentrated amount of traffic would all be cut off from one another if 41 were to be turned into a limited access highway. Many protesters would have you believe that the population will not grow and many try to kill Indiana_s growth by doing things to keep people out, such as no new roads and no county wide sewers or in some cases sending our children to live in the cities outside of Indiana rather than spending money on their future to make room for them here at home. We just lost a congressional seat because people are leaving Indiana in droves!

If you are not living in a cave, and have traveled any of the interstates in the tri-state area, only a fool would believe that we do not need another major access highway along with major upgrades to our current roads. Many interstates are already bumper to bumper even in rural areas many times a day. By converting SR 41 to I-69 status, Hoosiers will foot the bill, save a measly 25% and have NO NEW HIGHWAY for its most needy citizens. This while the great state of Illinois will profit more than our own people with a highway that is all but the property of the state of Illinois due to being located virtually on the Illinois/Indiana boarder. Also, lets not forget the economic loss to such highway that will be lost due to being built right near the Wabash River, cutting off and losing much of the economic gain to the west. Tear out one highway, then PAY THREE QUARTERS OF A BILLION DOLLARS to build on top of the old highway AND HAVE NO NEW HIGHWAY! Let me say this again, save 25% and end up with ONE highway instead of TWO! DOES THIS MAKE SENSE TO YOU! If it does, I need to sell you some swamp land in Florida! It makes sense to enviormentalist Andy Knott, he does not care about the hardships on people in South West Indiana with no access to Evansville, Indianapolis and all points between. We need to care about the people in the middle of this area that will receive the most help, not just those folks passing through our state. Not just the people of Indianapolis or Evansville, or Terre Haute, but those in the middle. Andy Knotts whole thought process, arguments and remarks do not include the very folks that this highway will help the most, those in the middle that have very limited access between the state capital and Evansville. The Environmentalist have even tried bringing the Amish community into play trying to get this project stoped, reaching for any straw to put a stop to this highway. I feel for the Amish and I believe we should do everything possible to help keep their culture in tact, but the matter is, life is changing faster than many of us like and the Amish are going to have to go along for the ride just like the rest of us whether they or we like it or not.

6.2

Terre Haute to Vincennes and on to Evansville, they already have a nice 4 lane highway connecting each other in SR 41 and I-70. If these highways area not already good enough, of which I am sure they may not be, it is only because the state of Indiana has not continued to upgrade those highways a little at a time over the life of those highways. That is not the fault of the poorest people that live in southern Indiana, but the poor leadership at the state. Similar to the problems with SR 37 between Mitchell and Bloomington, instead of building overpasses, & cloverleaves, we Hoosiers are doing the cheap thing and merely putting up unsafe stoplights at very busy and dangerous intersections such as 16th street in Bedford. Many people have died at this intersection, why, because of the lack of planning and our cheap attitude on highway construction. The situation at this intersection should never have been allowed to happen, at this late point in history, the price of fixing this death trap will be astronomical because of the build up of expensive business along this intersection and this is but one of many death traps between Mitchell and Indianapolis that should have never been allowed to happen.

Through NAFTA, Mexico_s economy will receive special treatment by the federal government in the decades to come. It will grow and prosper and I think its our governments goal to bring Mexico up to our standards along with taking ours down to theirs so that we do not continue to have so many Mexicans that want to come to America for a better life. Putting off this type of construction for another 20 years is going to cost a lot more later. The population is quickly out growing our roads today with new roads 10-20 years away! (At this present time, Indiana and Kentucky_s feud over where to put a bridge in Louisville is crippling that part of the state by its tardiness of a not yet built bridge that should have been built 15 years ago) Traffic between the two states is horrible now, yet we are still a good 15 years from having a new bridge, traffic will only get worse and the cost will go from a 1 billion dollars today to 5 billion in twenty years. The environmentalist will inflate the cost of any much needed highways by throwing everything it can in its way in an effort to stop highways that must and will be built in the next 30 years.

Lets wise up Hoosiers, the Interstate system across america is over 50 years old! In the past 50 years the population has grown but the interstate network has not grown. Soon you will not be able to travel anywhere due to hudge amounts of traffic clogging our inadequet interstate system. Do you want to stick your head in the sand and say, not in my backyard and live with the hardships to follow? Thats what your going to end up with if you do not pay attention to the poplulation growth and our lack of planing. At a Bloomington INDOT meeting over a year ago as well as those this past week, 90% of those at the in attendace were against any highway at all. I traveled to speak at the first round of meetings, but became scared to speak due the viloent nature of the enviromentalist and the like. How many others did not speak! Mostly mass groups of well organised enviromentalist that offer no solutions to the growing population problem other than saying, not in my back yard. They talked about the urban sprawl as a cancer, well my fine Hoosiers, that cancer they talk about is yours moms and dads, yours brothers and sisters, yours neices and nephews, your aunts and uncles that are making up this cancer. Its called poplualtion growth, to them, you are a cancer to be stomped out at any cost.

At this first meeting many months ago, in thier opening remarks, the state said this. They know that these meetings are made up of protesters that do no represent all Hoosiers. They know not all people want this in thier backyard. They also know what I have discribed in the above paragraphs to be true. I can only hope the state will do what is in the interest of all Hoosiers and Americans as a whole and not just what protestors want them to do, such as sticking our heads in the sand an hoping it will go away hoping to live in 1955. Too many hard working business folks, working families and yes Chanbers of Commerce members are standing back and watching our future slide away while we do very little to tell the state that we need the economic developemnt that this new terrain highway will bring to Southern Indiana. I guess I must be some kind of a Hoosier odd ball.

I find it wrong to send our children to the best colleges and universities and then send them to live in scarry unsafe places such as New York City, Chicago or Orlando so that us old folks can live in 1955. We cannot keep all of our children close to us, but then, we as Hoosiers are doing so very little to keep as many as we can! Its time to stop doing the cheap thing and build roads that will build a better Indiana! Build our road where it does the most good for the greatest number of Hoosiers and Americans regardless of cost!

Sincerely

Steve L Wilson
46 E Court Street
Paoli, IN 47454
812-723-2345

1020-004 Wilson, Steve.wpd

Subj: DEIS Comments
Date: 10/16/02 3:35:50 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Jason Bolander
Address = 4380 Silverthorne St
City = Bloomington
State = IN
ZIP = 47404
Email = jrb0626@peoplepc.com
Message = After reviewing all of the alternatives available, I am in favor of alternative 3C, with 3B coming in a close second. These two options provide the quickest transit time between Indy and Evansville.

These options not only open up Indy to Bloomington's labor pool, but they also open up Indiana University and Crane to Indy, as well as to the thousands of visitors these two locations receive. I believe industry growth in Bloomington would also improve.

Along the same lines, these options greatly improve the travel time between Evansville and Bloomington. Presently there is no easy route between these two cities. Has anyone done a study which shows the time savings that would be achieved here?

There should be a reduced number of accidents along the 37 corridor. Most commutors typically drive 65 mph between Bloomington and Indy; 3B and 3C would legalize this speed.

As a side note, I believe it would also be useful to upgrade 37 from Bloomington to Bedford as an offshoot of I-69, hence my reason for favoring 3C over 3B. It could be called I-169. This section is practically interstate already, so impact would be minimal. A similar setup exists in southeast Georgia, where I-185 branches off of I-85 and goes down to Columbus. 6.2

1016-003 Blonader, Jason.wpd

Subj: New I-69 Study Form Feedback
Date: 9/26/02 12:48:13 PM EST
From: stanley.graves@iwcr.com (Stanley Graves)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Stanley Graves
9303 N State Road 39
Mooresville, IN 46158

Message:
To reduce the individual and community conflicts, I belive that the route of SR 37, US 50 & SR 57 should be the preferred route. You have a SR 37 corrider that can be upgraded to interstate stands and you would have one major roadway (not two like I-70 & US 40) in southern Indiana. 6.2

0926-003 Graves, STanley.wpd

Subj: DEIS Comments
Date: 11/4/02 12:27:45 PM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Nancy Lethem
Address = 8751 South Rockport Rd.
City = Bloomington
State = IN
ZIP = 47403
Email = nlethem
Message = While no one can deny that we need an upgraded route between Evansville and Indianapolis, I find all proposed new-terrain routes to be patently absurd in their conceptualization. The damage to our valuable Indiana farmland, wildlife areas, and rural communities that would be caused by the new-terrain routes would be devastating, and the financial cost over the cost of improving existing thoroughfares is unconscionable.

If you care about quality of life for Hoosiers, you must thoughtfully weigh the costs of a new-terrain highway against the gains of only minutes in driving time and the economic pluses of the plan. These costs have not ever been addressed by the DEI studies, which makes the studies invalid and raises issues of trust between the public and the Department. 6.2

Please listen to the strong voices of many who have taken the time to educate themselves on both sides of the issue and have found that the benefits of a new-terrain highway do not justify the costs. The I70/I41 route is the sensible solution to retain and improve quality of life for all of us who live in and love Indiana.

Sincerely,
Nancy Lethem

1104-011 Lethem, Nancy.wpd

PUBLIC HEARING COMMENTS

Pat Robinson... Thank you. I may be the only person at least so far that's not from southern Indiana. I'm from Hamilton County, the other side of Indianapolis. I work as an agricultural consultant.....I've traveled all these areas quite a bit. I'm a farm boy by raising and I still love to farm and I'm here to help protect what I can of it and I'm definitely in favor of alternative number one for the record. Now there's a couple of other things I want to say, I also own some real-estate here, I have two kids that live here, two that are going to IU, one that's teaching school here so I have some vested interest even though I personally don't live here but come as often as I can. The real strong point I would like to make that I haven't heard brought up directly..... and this is some trivia, you could make money at parties on, and that is, Indianapolis already has more interstate in and out of this city than any other city in the United States. We do not need any more, so get your map out when you get home and I would respectfully ask that our officials do the same thing. Why do we need more interstates than any other cities? Are all of them wrong? I would also like to challenge you.....one other thing and I'm going to bring up those points that I haven't heard earlier tonight.....I heard earlier a gentlemen referring to the wetland and if we destroyed wetlands they would be replaced at a three to one ratio. Well if we do that then you need to add the three x-factors which is the number of farm acres that's going to be destroyed. That's not in your formula. And my last point I'd like to make is that when you use these figures of how much time your saving going from Indianapolis to Evansville all the time I hear the reference to the total time not the difference. Thank you. 7.1

0820-120 Robinson, Pat.wpd

The I-69 fiasco and reason number 12 why it should not be built:

Since INDOT seems hell-bent on building a new terrain highway no matter what the economic, resource, and human cost might be, I have undertaken a letter writing campaign to inform INDOT of their inherent ignorance of numerous points. I am writing this series of letters as a matter of formal public comment, and I fully expect INDOT to include this in their EIS and actually read and consider the points being made.

A twelfth reason why a new terrain I-69 cannot be built is the fact that environmental impacts have not been adequately addressed in this EIS. One of the main purposes of an environmental impact statement is to assess the environmental impact. That is two thirds of what an EIS stands for. This EIS, the other hand, seems more preoccupied with justifying the building of a new terrain highway with circular reasoning that can lead to no other decision.

The EIS does address the environmentally sensitive areas in the study region, but pays no more than lip service to actually trying to mitigate environmental effects. If it has been found that a new terrain highway will have major impacts on forest habitat in general (state-owned forest land in particular), unfragmented wildlife habitat, floodplain habitat, karst and cave habitat, wetland habitat, limestone reserves, and threatened and endangered species, then a new terrain highway should not be built. Furthermore, if it has been found that an upgrade of US 41 / I-70 would achieve the same linkage from Evansville to Indianapolis and will have much less impact to the environment, then either this alternative 1 or the no-build alternative should be the one finally decided upon. 7.1

This obviously biased study, however, is much more preoccupied with justifying the building of a new terrain route, and it ignores its own most important purpose – to address the environmental impacts. This is UNACCEPTABLE! An environmental impact statement MUST address the environmental impact and MITIGATE the negative effects. This study fails to do so, and attempts to hide this by including large amounts of factual information regarding the environment that will be affected. Although this factual information is ultimately needed and should be included, this study misses the point by not using this information to draw the conclusion on how to minimally impact these environmental factors.

The USFWS saw this as well, and addressed the exact same points in their Oct 16, 2000 letter. To start with an unbiased study and to minimize environmental impacts are critical to this whole process, and INDOT and BLM have totally missed the boat on these points. Since the USFWS letter was written two years ago, one would think that INDOT would correct these obvious mistakes, but again, they are too preoccupied with justifying their own predetermined conclusion to build a new terrain highway through southwestern Indiana.

Instead of formulating artificial "needs" for a new highway, this EIS needs to seriously examine the environmental impacts of the various routes. To throw out the least expensive and least environmentally damaging alternative number 1 before the process is completed just shows how much INDOT has completely dropped the ball and missed the point of the EIS. This must be remedied by giving serious consideration to minimizing environmental impact, which is to say that the no-build alternative and

alternative number 1 should rank high in the final group of alternatives to be considered for this study.

A new terrain highway is UNACCETABLE in southwestern Indiana. The only two acceptable alternatives are to not build it at all (preferable), or to upgrade US 41 / I-70.

Wayne Werne
RR 1 Box 254
Ferdinand, IN 47532

Wayne Werne

From: Larry Lawrence [mailto:LawrenceMedia@hotmail.com]
Sent: Wednesday, October 30, 2002 12:09 AM
To: indot@ai.org
Subject: I-69 extension

Dear INDOT,

I've recently learned that the proposed route for the I-69 extension from Indy to Evansville could wipe out the trail system at Southwestway Park (Mann Hill). As you may know this is one of the very few mountain bike trails in Metro Indianapolis and has the only trails with true elevation in the area. 8.1

I support the fiscally and environmentally responsible I-70/US 41 alternative to an all-new I-69.

Thank You,
Larry Lawrence
Brownsburg, IN

1030-021 Lawrence, Larry.wpd

From: Robinson, Larry [mailto:lrobins@indiana.edu]
Sent: Thursday, November 07, 2002 9:53 AM
To: indot@ai.org
Subject: I-69 comment

This is supposed to be the last day for comment on I-69, but your site says the comment period is already over and won't take an email. 11.3

The link for complaining about faults in the website is not found.

About I-69

Most of the county officials who passed that resolution requesting that I-69 not pass through Monroe County were DEFEATED in the election. So the resolution is moot.

Why doesn't the cost report for option 1 include added travel lanes on I-70?

I wrote earlier preferring option 3B. Now that I know it will tear down 3 churches, I am no longer for that option unless the location of I-69 is moved so it does not disrupt Prow Road properties.

Why not bring it in where 46 crosses 37?

Otherwise, I prefer options 3A, 3C, 4A, and 4B.

---- -X =@ o_= X<= <o> o-< <-I-= -> <O-O-O< <-88

Larry Robinson S/AP/EIS lrobins@indiana.edu
Indiana University (812) 855-5073 Room 42
Kinesiology Dept http://php.indiana.edu/~lrobins
1025 E 7th St Rm 112 HDTV and taxes killed RCA.
Bloomington IN 47405-7109

1107-470 Robinson, Larry.wpd

Subj: DEIS comments
Date: 11/7/02 4:43:23 PM EST
From: ezform@networkwcs.com
To: MGrovak@aol.com

FirstName = Gladys
LastName = Ezell
StreetAddress = 9350 N Mt Pleasant
Address =
City = Gosport
State = IN
ZipCode = 47433
Email = gfezell@juno.com
Comments = I only found out about the possibility of I69 taking my property in late September. I haven't been on this land for 100 years like Senator Lugar, but the 18 years I have lived here were in preparation for the retirement of my life. It is my home just as his 600 acres are his home. I find it unbelieveable that someone hasn't notified all land owners of the possibility of this highway taking their land. Then the public debate could at least be fair with all having the proper information. You must extend the public debate about this highway after notifying landowners that might be involved. If you do not, then I am sure you will be met with many forms of determents. This is so important to the citizens of Indiana that I believe all involved must have a voice and special consideration given to those that will be negatively affected. I am especially concerned for my elderly neighbors. They feel helpless and you must not allow this intimadation to persist. 11.3

1107-155 Ezell, Gladys.wpd

PUBLIC HEARING COMMENTS

Terry Sylvester... Good evening my name is Terry Sylvester, I live in Indianapolis more closely to Decatur Township in Southwest Marion County. I'm here tonight to address alternate route number two, three, and four option C1 or what is more commonly known as the Mann Road Corridor in Southwest Marion County. The Indianapolis Star, Television News Reports, and the Mooresville Newspapers have all reported that the most prominent route for I-69 coming into Indianapolis has been either State Road 37 (SR37) east of White River or SR 39 connecting at I-70 at the Monrovia, Belleville interchange. As recently as two weeks ago option C1 on the alternate route number two, The Mann Road Corridor has been told to me that the map of that has simply has just appeared in the last two weeks. Nowhere until in the last week did any resident to my acknowledge in Decatur Township know of the proposed route through our township following Mann Road. I must also tell you I am the Vice President of the Decatur Township Civic Council which is a 300 plus member organization neighborhood organization in Decatur Township. The proposed Mann Road Route will route this highway very near very many new housing developments, it will also route this the interstate near what is to be known as the Southwest Way Park Expansion program, Councilor Cockrum talked about that earlier. To sum up my concerns is we believe that this is rather unfair that the Mann Road Corridor up until the last few weeks is not been discussed or made known to any of the residents of Decatur Township in Indianapolis, this is said in view of the proposed announcement of the final route of the interstate due some time within the next few months. We in Decatur Township certainly need more time to review this proposal as this has come as quite as a surprise to us in just the last two weeks. Thank you. 11.3

0819-068 Sylverster, Terry.wpd

Subj: DEIS comments
Date: 11/7/02 10:28:56 AM EST
From: ezform@networkwcs.com
To: Mgrovak@aol.com

FirstName = Steve
LastName = Howard
Email = showard@chamber.bloomington.in.us
Comments = Dear Mike,

I am writing in two capacities: as President of the 1000-member Greater Bloomington Chamber of Commerce (GBCOC), and as former Commander of Crane and VP of the Southern Indiana Business Alliance (SIBA).

On behalf of both GBCOC and SIBA, I offer enthusiastic endorsement of completion of I-69 between Evansville and Indianapolis. Neither organization supports a particular route, other than one that serves both the state and region well. On that basis, we do NOT support the 70/41alternative, which would NOT serve the region and state well. We are confident that the careful and thoughtful analysis evidenced in the DEIS will lead you to the right choice of a route.

We feel there are many reasons to complete the highway through the heart of the SW quadrant of the state. The most important reason is economic. The approximately 800,000 Hoosiers who live in this region have long been deprived of a modern transportation system, one upon which to build a robust economy. The current system is fundamentally unchanged since 1940. The result is obvious: a very weak economy for most of the region. This has profound impact on the education, health, safety, and economic stability, and quality of life of the people who live in the region.

In respect to Crane, that facility has tremendous potential to serve as an economic engine for SW Indiana. SIBA is working hard to save Crane from the upcoming round of base closings; having the promise of access to a modern transportation system would help us immensely in our efforts. But, far more importantly, access to I69 would be an extremely valuable resource as SIBA continues its efforts to establish Crane a the centerpiece for high tech regional economic development. 3.4.4

Mike, you, your company, and the INDOT have done a terrific job with the DEIS. It is a solid document, one upon which a sound decision can be made. Both SIBA and the Chamber appreciate your very hard work - often in a difficult, uncivil, disingenuous environment - to produce such a comprehensive and credible document.

Thank you for all that you have done to move this project forward. We look forward to a decision and in moving ahead with engineering and construction.

Steve Howard

1107-444 Howard, Steve.wpd

Subj: DEIS Comments
Date: 11/7/02 9:07:57 AM EST
From: ezform@networkwcs.com
To: mgrovak@aol.com

Name = Paul A. Lake
Address = 2364 South Co. Rd. 750E
City = WInslow
State = IN
ZIP = 47598
Email = plake@sigecom.net
Message = I would like to indicate my support for an I-69 routing which would be more direct that US41/I70, more specifically, I strongly support routing this interstate through Pike County.

As both a resident of Pike County and Director of its not-for-profit Economic Development Office, I am well aware of the importance of access/connection to major markets. Without a more direct connection to Evansville or Indianapolis, rural counties such as Pike, Martin and Green counties are unable to compete in a global economy. One need only look to surrounding region to see which communities have been most successful at attracting business and industry in the past 3-4 decades. Access played a key role for all of them. One hears from opponents that, "interstates do not bring development" in one breath. In their next breath they say that interstates cause overbuilding. They can not have it both ways. One only need travel any of the interstate coridors to see how much of an impact a modern interstate has had on investment and job creation. 2.3.2

Additionally, safety as we drive is becoming more and more important in our daily lives as the number of vehicles travelling 2 lane highways increase.

Again, I stand firmly in favor of development of a direct route from Evansville to Indianapolis and hope INDOT moves quickly in making this occur.

Paul A. Lake, Executive Director
Pike County Growth & Development Council (and county resident)
714 1/2 Main Street
Petersburg, Indiana 47567
Phone 812.354.2271

1107-510 Lake, Paul.wpd

Subj: New I-69 Study Form Feedback
Date: 11/7/02 12:11:21 PM EST
From: rsims@indiana.edu (Rebecca I Sims)
To: lsadler@indot.state.in.us, mgrovak@aol.com

A message and request for information has been sent from the www.i69indyevn.org website. The supplied contact information and message are both given below.

Rebecca I Sims
403 W. Race
Odon, IN 47562-1229

Message:
The sad part about always trying to give everyone
the opportunity to have input, there will always
be a group in opposition that will cause a delay in the project.

I-69 should already have be built at yesterday's prices. All the studies have increased the cost and that has been brought on by CARR. I wonder if they recognize their part in the increased cost? I am certain they do and they are hoping that will bring a screeching halt to the project.

I would like to see the members of CARR and COUNT US drive from Evansville to Indiana starting on a Monday morning around 6:30a or 7a instead of leisurely taking a Sunday drive to look at what they feel is destroying the environment and farms.

How many farmers are really making their livlihoods from farming? Most have another job and farming has become their second job or hobby. You need to have a good transportation source to ship your raw materials and manufactured goods to succeed in any business (farming or manufacutring). 2.31

I don't know that the availablity of drugs will increase because of the I-69. Drugs manage to arrive in cars, trucks, ... using our current 2 lane highways or they can always fly them in. It is happening now. So address that issue separately from building I-69.

I-69 will offer alternate travel routes and therefore, help reduce the number of cars traveling the current 2 lane roads. CARR and COUNT US can still drive on thier beloved roads.

The new jobs created building I-69, the competitive gasoline prices, business growth .... are all positive factors needed in the greatly overlooked part of our State. We should not be treated as the step-child. Indiana's territorial capitol was in Vincennes and the first state capitol was in Corydon. Therefore I recommend that the path of I-69 should run from Indianapolis to near Bloomington, close to Crane NWSC, and near the path of the Erie Canal.
That is between two important historical sites and will follow the path used by our ancestors.

1107-386 Sims, Rebecca.wpd