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RE: I-69 FEIS Public Comments

February 2, 2004

Dear Mr. Grovak,

Please accept the following comments on the record regarding INDOT's I-69 FEIS for the extension of I-69 from Indianapolis to Evansville. There are a number of broad topics that I wish to address as insufficiencies in either the facts put forth in the I-69 DEIS and FEIS or the analyses employed. These broad topics will be represented as headers. Additionally, please note that these comments are being submitted via email and via hardcopy in the US mail.

PART I: Public Involvement Process – evidence that INDOT did not adhere to Federal laws and guidelines

- A. Only three public hearings were held for the I-69 DEIS, and those did not provide all interested residents with an opportunity to attend in a convenient and accessible location at a convenient time. They were held in Terre Haute, Bloomington, and Evansville on three consecutive worknights. Considering the length of the potential routes and the number of affected communities, businesses, and homes along these stretches, a total of three public hearings was insufficient access to Indiana's citizens for any real input or impact on the final decision, before the decision was made. If INDOT's intention was to limit this public involvement to folks in urbanized areas of the state, even Indianapolis residents were not accommodated. The three public hearing sites were distant locations from Indianapolis, especially when considering the additional need to locate school buildings in unfamiliar cities. Most of the residents who would be impacted by the route segments proposed up Mann Road in Decatur Township or SR 37 in Perry Township (both Marion County) were not given the opportunity afforded other areas, even though these residents stood to lose substantial assessed value, business and home acquisition, negative social impacts and increased risks to air and drinking water quality should I-69 be built in one of these locations.

- B. The DEIS was released in June of 2002 and the three public hearings held right after, even though two more months of the comment period was available. These hearings were the only meetings in which the public comments were considered 'on the record'. The public did not have adequate time to read, digest, and evaluate the DEIS before being required to speak to the record at the public hearings.
- C. Throughout the public comment period for the I-69 DEIS, INDOT pressed to limit to only those discussing the 'purpose and need' for the I-69 project. This was a clear attempt to limit the scope of 'acceptable' public discourse and comments on the record. This is yet another example of how INDOT did not have a truly open and honest public involvement process in mind when it went through the perfunctory and statutorily required public process.
- D. The Mann Road route segment was added at the last minute and little was done by INDOT to be sure the abutting community was aware of its inclusion in the I-69 DEIS. This is just one example of the lack of interest INDOT had in conducting an effective public involvement process. As a matter of fact, the Decatur Township, Marion County, area learned of the Mann Road option by serendipity just two days before the last public hearing. We had no time to respond effectively. The Decatur Township Civic Council called its own meeting and invited INDOT Commissioner J. Bryan Nicol to attend, which he did. On September 9, 2002, over 400 people, most from Decatur, but nearly all from Decatur Township, Perry Township, (both in Marion County) and Morgan County, attended and many spoke. During brief comments, Mr. Nicol, Commissioner of INDOT, claimed that the Mann Road option was not added at the last minute and that its existence was widely advertised, while providing no details. Subsequently, Senator Richard Lugar, in his personal letter to the public record on the I-69 DEIS, pointed out that he too was kept in the dark about this route, even though he received regular briefings. The Indianapolis MPO also was not informed about this route option until approached by residents.
- E. Residents and business owners along the route were not personally notified that I-69 might come either by them or eventually take their property. Senator Lugar remarked eloquently on this in his letter to the public record dated October 23, 2002. "With a highway project of this magnitude and consequence, I would hope that highway officials would go well beyond the requirements of the law in engaging and informing affected communities and landowners about potential routes. In fact, I believe that every farm owner and farm family affected by I-69 planning options should have ample notice of vulnerability from the planners or an appropriate branch of government while there is time for public comment and a reasonable opportunity to change the plan. The public is best served by vigorous debate on these issues, and I will contribute my voice to these public deliberations." INDOT did not notify anyone along the potential routes for the I-69 DEIS public comment period. Nor did they take the opportunity to do so for the I-69 FEIS, although the suggestion was a substantive one offered more than a year before that public comment period commenced.
- F. If INDOT believes that the I-69 project is so large and so complex that it must be broken up into six segments for the Tier II work, then it logically should have allowed at least 1 public hearing in each of these 6 segments so that pertinent information could have been provided to people in those locations and they could have had the opportunity to testify in a location and time convenient to them.
- G. INDOT allowed only 45 days for public comment on the I-69 FEIS, released just before Christmas on December 19, 2003. This despite an increase to 3000 pages; nearly 1000 more than the I-69 DEIS, for which 90 days was allowed. Commissioner Nicol's response to reporters concentrated on not wanting to give certain environmental groups the time necessary to have

consultants, experts in the transportation issues involved, review the I-69 FEIS. The reports on Mr. Nicol's comments never mentioned any concern that if experts didn't have enough time to review the document, surely neither did common citizens. INDOT's public involvement process should not revolve around experts, but provide the people of Indiana with adequate opportunity to be heard before decisions are made or doors closed.

- H. In the 'FHWA/FTA Interim Policy on Public Involvement' (undated), which is available on the FHWA website, a number of objectives are listed to which the FHWA and FTA commit. Among them are:
1. *'Ensuring that the public is actively involved in the development of public involvement procedures themselves in ways that go beyond commenting on drafts.'* – INDOT has indeed limited its public involvement to just that; commenting on drafts.
 2. *'Strongly encouraging the State departments of transportation, metropolitan planning organizations, and transportation providers to aggressively seek to identify and involve the affected and interested public, including those traditionally underserved by existing transportation systems and facilities.'* – INDOT did not do any identification or notification of those who would be most interested, if only they had known of either the I-69 DEIS and I-69 FEIS potential impact on their property or neighborhood.
 3. *'Strongly encouraging planning and implementing agencies to use combinations of different public involvement techniques designed to meet the diverse needs of the general public.'* – INDOT biggest failure, by far, in the public involvement process was in not getting information about potential impacts to the citizens who had the most need for input, those along the potential routes.
- I. INDOT has been engaged in a public disinformation campaign pressing the idea that I-69 cannot be stopped and all the decisions are done, except for fine tuning decisions. This includes their deliberate inclusion of Route 3c in the 2003 edition of the official state map.
- J. In the 'FHWA/FTA Questions and Answers on Public Involvement in Transportation Decisionmaking' document available on the FHWA website, Q&A #10 says the following:
*"10. How do the public involvement requirements for project development and the NEPA process apply to public involvement for major transportation investment studies (MIS)?
An MPO's overall public involvement process should describe the approach to be used to involve the public in any MIS conducted in that metropolitan planning area, regardless of whether the lead agency for the MIS is the MPO itself, the State DOT, or the transit operator. At the start of the interagency consultation, the cooperating agencies need to tailor a specific public involvement strategy for the MIS. The strategy should engage the public in the consideration of the purpose and need for a major investment as well as in the development and evaluation of all alternatives. If the MIS incorporates development of a NEPA document, the public involvement strategy must comply with the public involvement provisions of 23CFR Part 771 or 40 CFR Part 622."*
INDOT and the Indianapolis MPO have not created any joint public involvement process and certainly not one tailored to the I-69 EIS project and the citizens of Indianapolis Metropolitan Area.
- K. There was not one, advertised, INDOT-sponsored meeting about the I-69 EIS project to which the public was invited or made welcome to attend in the entire Indianapolis Metropolitan region. Our area has the dubious distinction of bearing the largest negative economic and social impact of any similarly sized segment along route 3c and it carries increased risk for negative

impact on our air quality and drinking water supplies. Yet, the public has not been afforded any measure of public involvement in the capitol city.

- L. A study by the Hoosier Environmental Council in cooperation with Citizens for Appropriate Rural Roads, made possible only through Freedom of Information filings, of the actual comments made during the I-69 DEIS public comment period, showed the Indiana public to be overwhelmingly against the extension of I-69 from Indianapolis to Evansville via a new terrain route. Of the 21,873 respondents who expressed a preference, 20,467 (94%) supported the I-70 to US 41 upgrade option or opposed new terrain routes. This is clear public input and it has been totally ignored by INDOT and then Governor O'Bannon. The route Governor O'Bannon 'chose' was the exact one he had favored for over a decade. Now what were the odds that the public involvement process were honest and above board?

PART II: The Economic Impact – flawed I-69 DEIS and FEIS analysis and unequal distribution of burden

- A. INDOT has refused to undertake a cost/benefit analysis for the current I-69 DEIS and FEIS. This is unacceptable as it leaves the citizens of Indiana without a hugely important piece of information necessary for cogent public input and decision making.
- B. The best the citizens of Indiana can do is to look at the 1996 DEIS on its proposed direct route from Evansville to Bloomington and update those data according to additional data provided in INDOT Technical Reports. In 1999, Dr. Wim Wiewel, an economic development expert from the University of Illinois at Chicago, found that the cost per job created would be a staggering \$1.56 million. Based on INDOT's current proposal, the cost per job would be \$359,375. INDOT has not proven that the extension of I-69 is an financially affordable economic boost.
- C. INDOT's cost/benefit analysis of its 1996 DEIS (Evansville to Bloomington) suggested a 1:1.54 ratio. In May 1997, Dr. Neal Johnson, an economist at Indiana University published an analysis of INDOT's analysis and found that this was not new job creation, just job relocation from other states. Dr. Johnson corrected several deficiencies in INDOT's methods and found that the actual cost/benefit ratio would be 1:0.81; or a loss of 19 cents for every dollar invested.
- D. Both Dr. Wiewel and Dr. Johnson's work reiterate the conclusion of Donohue & Associates in 1991. They were hired by then Governor Orr to evaluate the utility of linking Indianapolis and Evansville via a freeway. In their report 'Southwest Indiana Highway Feasibility Study' they said: "In conclusion, none of the routes analyzed in this study are recommended for construction solely on an economic feasibility basis."
- E. The lion's share of the estimated costs of Route 3c would be spent at the northern terminus, from Martinsville to I-465 in Indianapolis. This is not because of extensive new terrain acquisition, but because of the large number of homes and businesses to be removed from the required right of way. This will cause a net negative economic impact in this section of Route 3c. The removal of these taxable units will not be recovered by any increase in businesses built in response to the Freeway's proximity.
- F. If INDOT were to conduct an independent purpose and need analysis and accompanying EIS for this section of Route 3c, they could not justify its construction, as it would create a large net negative economic impact. Plans to improve anticipated congestion along SR 37 have been replaced by plans to construct I-69 in the Indianapolis Regional Transportation Improvement Plan; so more than one solution to SR 37 congestion have been deemed applicable. Thus, this

segment, at least, cannot be considered viable without the remainder of Route 3c and should not be granted 'Independent Utility' status for any Tier II study.

- G. INDOT refused to share GIS data with Katherine Price, Perry Township Assessor. None the less, Ms. Price conducted a survey of parcels along INDOT's Route 3c in Perry Township and she estimates the loss of \$100-200 million in current assessed value. This does not, of course, include the apartments on the southeast corner of Southport Road and SR 37 nor does it include anything yet to be built in this band. This is a huge tax shock to this Township and is an unfair economic burden to place on this community.
- H. INDOT was challenged after Route 3 c was announced, for its outdated aerial photos of the SR 37 corridor in Perry Township, Marion County. Commissioner Nicol asserted publicly and in the I-69 FEIS comments that the numbers of properties to be acquired in this stretch were determined by physical examination and not the aerials. At no time, and certainly not in the I-69 FEIS, did Mr. Nicol divulge when this physical examination took place, nor released the inventory of 'required parcels' as of that date. Thus, the public can only state that INDOT has not fully disclosed important economic information necessary for detailed examination by the public, nor has it estimated the potential growth in this area that would subsequently require purchase for I-69 right of way. The public had a right to know these costs and assess the accuracy of INDOT estimates before the final report was released. The public retains the right to know these figures before any movement into an I-69 Tier II process. In addition, these costs directly impact the accuracy of the final I-69 costs of Route 3c, and the entire state deserves that information.
- I. Route 3c costs twice that of the I-70 to US 41 route and, even if you accept the unproven ascertains in the I-69 DEIS, will provide minimal improvements in economic benefits for the huge increase in price.
- J. The loss of property values for those near the route is not included in the analysis of financial impacts. Nor is the loss of traffic through the Terre Haute area, leading to loss of business activity, considered in the text of the I-69 DEIS and FEIS. These should have been considered in the overall evaluation leading to a decision of a Route.
- K. If the extension of I-69 from Indianapolis to Evansville is being considered as an economic engine for Indiana, the appropriate comparisons should have been with the ability of other types of economic engines to create jobs and wealth for this state for the same amount of 'invested' capital. This type of comparison was not done. In our troubled Indiana economy, we must spend our precious resources in the approaches that will bring the most benefit.
- L. Indiana is broke and it is fiscally irresponsible to move forward with the I-69 EIS project without firm numbers for costs in construction, tax base erosion, and the means to fund it all. The people who live along the proposed routes are suffering property value loss right now because of the push by INDOT to convince the public that I-69 is a done deal. The good people should not suffer this personal economic loss when reasonable efforts at complete evaluation and analysis was not attempted by INDOT and when no foreseeable means to actually fund the ultimate project have been identified.

INDOT has not appropriately reported to the citizens of Perry Township, Marion County, enough information for those citizens to assess how accurate INDOT's enumeration of homes and business loss really is. INDOT has not appropriately worked with local governmental units to obtain valuable information from them, and vice versa, so that cogent comments could be contributed through the

public involvement process to improve the final decision of route. INDOT has not undertaken vital analyses of cost/benefit and costs/job for each potential route. INDOT has not demonstrated that the Martinsville to I-465 in Indianapolis route segment is justified as having independent utility. In fact, the data made available by INDOT in the I-69 DEIS and FEIS clearly show that a study of this route segment would demonstrate that this section should NOT be built.

PART III: The Negative Impacts of Route 3c in Indianapolis – the decision in favor of Route 3c is flawed

- A. The Perry Wellfield, a major source of clean drinking water for Central Indiana, was not included in the I-69 DEIS and was not evaluated for the increased risk of contamination before Route 3c was chosen. Even though the Indianapolis MPO in its public comments on the I-69 DEIS, and a number of citizens pointed out the existence of this Wellfield and the wellheads in both Marion and Johnson Counties along SR 37, INDOT had not considered it as of the June 17, 2003, meeting of the Citizens Advisory Committee of the Indianapolis MPO. Vincent Bernardin was presenting the Route 3c information at this public hearing and, when questioned about it, relayed that it was the first he had heard of the Perry aquifer and would get back with more information. The potential contamination of this critical drinking water supply was not evaluated before the Route 3c was selected. If I-69 were to be built along the SR 37 corridor in Perry Township, INDOT estimates widening from 4 lanes to 8 lanes and that traffic would increase 4-fold. To ignore these unnecessary additional risks to a rapidly growing area's water supply before a route is chosen is in direct contradiction to the intention of an Environmental Impact Statement. To ignore these unnecessary additional risks to a rapidly growing area's water supply after being advised of the aquifer's existence, clearly shows the lack of integrity with which the public involvement process was conducted.
- B. Since information about wellfields, wellheads, and drinking water supplies has been removed from the public domain for homeland security reasons, independent verification of the potential risks needs to be conducted. Since the Indianapolis Water Company is now a public utility, they should bear responsibility to conduct that independent study on behalf of its customers and ratepayers. This has not been done even though they are the only group able to provide knowledgeable critique and evaluation of the INDOT's proposal.
- C. An additional risk of contamination to the Perry aquifer comes from the proposed construction of a elevated interchange at I-465. This interchange and its approach would be elevated over active as well as spent limestone-mining pits. These pits have not been designed and constructed so as to prevent road contaminants from washing into the pits and leeching into the groundwater. These additional portals for contamination of a vital Central Indiana drinking water supply has not been addressed in either the I-69 DEIS or the FEIS.
- D. In its public comment, the Indianapolis MPO found that the proposed route for I-69 would put the Indianapolis Metropolitan region out of attainment of air quality standards. They were subsequently given a new model with which to run the data and that model predicts a different outcome. Neither model uses the new air quality standards to come into force in 2004. Since any extension of I-69 will necessarily be built well after all of the fine points of the new standards have been ascertained, the terminus of I-69 in Marion County should not be decided until the various scenarios can be modeled with the new standards. Negative air quality impacts should not be grandfathered in at the last moments of the old standards. This would be to the detriment of the health of the regions residents and the detriment of the area's ability to attract businesses interested in locating in non-polluting, high quality of life, cities.

- E. The Indianapolis MPO public comment on the I-69 DEIS concluded that connecting I-69 to I-465 through I-70, for a wide variety of reasons, was the best choice. These included the negative impacts on the community and its neighborhoods, the negative impact on air quality, and the risk of contamination to the Perry Wellfield as factors weighing against Route 3c. This advice was ignored in the selection of Route 3c and not adequately addressed in the FEIS.
- F. The I-69 FEIS shows two additional overpasses and one additional interchange in Perry Township, Marion County, for Route 3c. The additional costs have not been reflected in the price tag for this route.
- G. In sworn testimony before the Metropolitan Development Commission on August 20, 2003, INDOT Commissioner Nicol stated that there had always been the intention of constructing an interchange at Southport Road. He said that this interchange was accidentally left off the DEIS map of Route 3c, but was discussed in the DEIS text. There is no reference to a Southport Road interchange in the I-69 DEIS text. The cost of this additional interchange have not been added to the total price tag for Route 3c.
- H. Perry Township is still growing along the SR 37 corridor. There is no estimate from INDOT as to the final purchase price and loss of assessed value for the construction of I-69 down Route 3c. These cost projections are necessary for appropriate and complete evaluation of this Route as compared with the other preferred and non-preferred Route options. The decision in favor of Route 3c is flawed from that perspective, among many others.
- I. No answer has been forthcoming from INDOT regarding the date of its survey of homes and businesses to be taken if Route 3c remains the choice for I-69 extension. The public therefore has no idea how relevant the figures reported in the I-69 DEIS and FEIS are. In addition, the new construction along the SR 37 corridor in Perry Township since the release of the DEIS, is not reflected in the FEIS.
- J. The existing I-465 interchange with SR 37 is too close to the proposed I-465 / I-69 interchange to meet Federal Highway design safety standards.
- K. The costs of widening I-465 to accommodate INDOT's projected traffic increases due to I-69 have not been included in the costs for Route 3c. INDOT maintains these improvements would be made anyway, but provides no projections for the time before such improvements would otherwise have been required.
- L. The costs of improvements to the Bluff Road corridor, necessary because of daily commute traffic flow impedance because of the proposed construction of I-69 along the SR 37 corridor, have not been included in the costs for Route 3c.
- M. The Social costs analysis was limited to the purchase of homes and businesses. They should also include the high costs to the community of trying to survive being drawn in half.
 - 1. The Perry community will see longer fire and ambulance response times to the west of I-69. Children attending the Rosa Parks Elementary School will be on buses for longer times each day.
 - 2. The shopping, recreational, and religious, amenities now conveniently located, will be further away for all practical purposes.
 - 3. The desirability of living west of the freeway will be substantially diminished and property values will be affected.

4. The taxes now paid on the \$100-200 million in assessed value to be taken by INDOT, will have to be paid by the existing taxpayers of Perry Township. That is the estimate of the current assessed value at risk from I-69. The SR 37 corridor continues to build and those near-future assessed value increases have not been projected.
5. It is estimated that for each \$100 million assessed value lost the property tax rate will need to increase by a full dollar.
6. There is no realistic expectation that, in Perry Township, more business will be created because of I-69 than is taken by I-69.

INDOT failed to include the increased risks of contamination of the public drinking water supplied from the Perry Wellfield in its analysis before choosing Route 3c. They have yet to provide a quality analysis of these risks from the projected increased traffic and winter snow removal pollutants as well as contamination through the limestone-mining pits under the proposed new I-465 interchange. INDOT has not addressed the economic and social price Perry Township citizens would be asked to pay if I-69 were to be built along Route 3c. Some agency with the authority to do so should require INDOT to go back and do a complete analysis of the impacts in Perry Township that they have so far ignored, hold public hearings in Perry Township, and then re-evaluate the preferred route for the extension of I-69 from Indianapolis to Evansville.

PART IV: The Purpose and Need goals were not justified and the route option improperly evaluated. – INDOT obscured miniscule performance differences with labels of ‘high’, ‘medium’, and ‘low’.

- A. In his presentation to the Technical Committee of the Metropolitan Planning Organization, June 19, 2003, Vincent Bernardin flatly stated that the I-70 to US 41 route performed poorly on the purpose and needs goals primarily because it is already built. He did not address the no-build option’s performance, but one can easily see that it cannot meet increased performance unless cost/benefit analysis is conducted and considered important to the final route selection.
- B. The I-69 DEIS and FEIS purpose and need section ranked the time travel between Indianapolis and Evansville as the longest of the 12 pairs considered. The fact that one of the twelve, by mathematical certainty, had to be the longest, was not justification enough to conclude that therefore it is a problem that must be rectified with a freeway. No outside standards or objective evaluation was applied to suggest that the time of travel must necessarily be shortened. Additionally, because there was no objective evaluation of this point, the 12 minute difference between Route 3c and I-70 to US 41 upgrade (Route 1) was not subjected to scrutiny. This meager difference in a 3 hour trip was assigned a performance adjective of Route 3c meeting the goal as ‘high’ and Route 1 as ‘low’.
- C. The purpose and need section examined, again without independent criteria, the so-called ‘accessibility’ ranking of a number of cities in or just outside southeastern Indiana. A rigorous analysis might very well suggest that the core ‘problem’ to be solved is that Evansville is situated in a low population area without what the authors consider a major airport. The very existence of Chicago enhanced the ‘performance’ of the northern Indiana cities and Indianapolis enhanced the ‘performance’ of the central Indiana cities. Therefore, it would seem that, if INDOT is desirous of more people living in southwestern Indiana, then \$2 billion dollars could be better spent achieving that goal than by building a freeway. In evaluating the various route options, INDOT did not examine them with the same criteria as used to ‘demonstrate’ a need. No, they changed to how many people would be within 30 minutes of a major urban area, 1-3 hours of

Indianapolis, or 1 hour of a major educational institution. The last was 'demonstrated' in the purpose and need section, to not even be a problem. As for the travel time to Indianapolis, the only way to decrease that is to raise the speed limit. Thus, Route 1 and no-build could NEVER accomplish this goal for the simple reason that those options do not increase a speed limit near the Capitol city. Thus INDOT used a complex 'index' to create a fake need and used a separate methodology to find a 'cure'.

- D. Traffic congestion was also a topic in the purpose and needs section. Even though the examination of a variety of criteria would suggest years of neglect of the Evansville region by both INDOT and local transportation authorities, they conclude that I-69 is the cure to Evansville's 'problem' with traffic congestion. Referring even momentarily to Figure 2-19 would show that the area with the most freeway congestion (INDOT's purview) is in the opposite corner of Indiana, and not in Evansville. Nonetheless, congestion relief provided by the various routes were evaluated and those using the SR 37 corridor to connect with I-465 in Indianapolis were shown to provide the most relief. Not to Evansville, but to Indianapolis. This of course, was not the 'need'. The use of the adjectives 'high' vs. 'low' achievement of that goal is on the most miniscule differences in performance calculated for this goal. In addition, no statistically significant difference between any route options was demonstrated.
- E. The purpose and need looked at the economic conditions in southwest Indiana and would seem to have actually proved that this portion of Indiana is in as bad economic straights as Indiana as a whole. Because Indiana has so many miles of interstate, an objective observer might conclude that more freeways was not the solution to this problem. But, INDOT decided otherwise. Instead of calculating a cost/benefit analysis or the cost per job predicted analysis, INDOT chose to evaluate business accessibility, a totally different measure than economic development. This 'accessibility' is exactly the same as personal accessibility, wherein 'high' achievement of the goal will correlate with the routes that cause an increase in the speed limit near Indianapolis.
- F. The real purpose for this proposed extension of I-69 from Indianapolis to Evansville is to build the NAFTA highway. This was not evaluated per route option. Achievement of this goal should have been evaluated according to cost, environmental impact, social impact and all of the other critical impacts required for an Environmental Impact Statement. In these, Route 3c fails miserably in comparison to almost every other route. Because this is the only purpose or need that can withstand examination, it also says that the 6 segments INDOT wants to carry forward in Tier II, do not really have independent utility. If the NAFTA highway is not built, there is no purpose or need for any of these segments to be built. And if the NAFTA highway is built, there is no evidence presented by INDOT to suggest that Route 3c is the best choice. An objective analysis of their 'data' would indeed suggest just the opposite, that Route 3c is one of the very worst route options.

In the I-69 DEIS and FEIS, the no-build option was merely employed to provide a baseline and was not fully evaluated as a choice. The purpose and needs were set up without critical and independent analysis of the root causes, and therefore root solutions to the supposed 'problems' were not addressed. Typically the analysis used to imply a 'problem' was not later employed to evaluate the various route options for how well they would solve that 'problem'. Analyses used to evaluate the route options were not subjected to statistical calculation for mathematical significance. Word adjectives were applied for 'high' to 'low' performance on the goals with the most miniscule differences, instead of a realistic examination of the data leading to a realistic examination of the route options. Protection of the financial assets of Indiana taxpayers, the environment, and the neighborhoods and communities of

those in the path of these route choices, were not consider or evaluated as goals of the I-69 DEIS or FEIS.

PART V: There are several additional impacts to Marion County that have not been fully evaluated by INDOT or reported to you in this letter. Enclose is a presentation to the Indianapolis Metropolitan Development Commission outlining those impacts. – *The Case Against I-69 New Terrain – Indianapolis Community Report to the Metropolitan Development Commission* by the Marion County Alliance of Neighborhood Associations and the Hoosier Environmental Council, dated August 18, 2003.

Sincerely,

For:
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Patricia C. Andrews

cc: Lyle Sadler : lsadler@indot.state.in.us
Robert Tally
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enclosure