

The I-69 Evansville-to-Indianapolis Study
Tier 1 Environmental Impact Statement

Task 3.5.1 Report
Summary of Comments Received –
Purpose and Need Discussion Paper

April 30, 2001



INTRODUCTION

On August 9, 2000, the Indiana Department of Transportation (INDOT) published a discussion paper on issues related to the Purpose and Need for the I-69, Evansville to Indianapolis Study. This discussion paper was the subject of public meetings held in August, 2000 (in Jasper, Vincennes, and Indianapolis). It also was posted on the project web site. In all these venues, input was requested regarding the Purpose and Need for the I-69, Evansville to Indianapolis project.

This paper summarizes the input which was received, and how it was considered in preparing the Draft Statement of Purpose and Need, which was published on April 17, 2001.



COMMENT SUMMARY

Comments are categorized by the type of issue(s) which they addressed. Comments as stated here may represent similar statements made by multiple individuals or organizations. With each comment is an explanation of how it was considered in preparing the Draft Statement of Purpose and Need.

LOCAL ECONOMIC GOALS

Comment: Careful attention must be paid to effects on existing businesses, especially smaller businesses.

Consideration: This is an important consideration. We have included under Goal 7 (“Support sustainable, long-term economic growth”) the performance measure of “Estimated change in roadside business sales.”

NATIONAL I-69 PROJECT

Comment: Congress has designated that the National I-69 Project (Corridor 18) must serve Bloomington. Therefore, only those alternatives which serve Bloomington adequately fulfill the Purpose and Need for this project.

Consideration: This issue was the subject of a legal analysis provided by INDOT’s outside legal counsel in July 2000. That analysis is posted on the project web site, www.i69indyevn.org, in the Frequently Asked Questions section. Based on that analysis, both INDOT and FHWA have concluded that the legislation designating National I-69 specifies only that it must connect Indianapolis and Evansville. Therefore, Purpose and Need criteria regarding the National I-69 project specifies only that the route must connect Indianapolis and Evansville.

Comment: The study must be open to alternatives to a new highway. This includes non-transportation alternatives.

Consideration: Actions of the Congress during the last decade, and supporting administrative direction, have established a highway link between Indianapolis and Evansville as part of a vital national priority, National I-69. Most recently, in the *Announcement of I-69 Status*, published in the December 8, 2000 *Federal Register*, the Federal Highway Administration stated, “The Statement of Purpose and Need (for the National I-69 Project) identified benefits to the Nation that have been shown to outweigh the costs of providing the transportation facility. ... Studies



considering alternative transportation modal choices have identified than an interstate highway facility would best meet the needs as identified.”

Comment: The Purpose and Need for this Evansville to Indianapolis project also must clearly fulfill the needs identified for the National I-69 project.

Consideration: Two of the 10 goals in the Draft Purpose and Need Statement (9 and 10) directly address the National I-69 project. Performance measures associated with these goals emphasize the importance of freight movements in the National I-69 project.

Comment: The Purpose and Need should not use inflated traffic projections based on the hypothetical National I-69 Project.

Consideration: The traffic data in the Purpose and Need statement is based on existing conditions and the future (2025) No-Build condition. Therefore, the traffic data presented in the Purpose and Need statement reflects the traffic congestion that will exist in the future if the National I-69 project is *not* built. In later stages of this study, when we analyze the impacts of the various “Build” alternatives, the base case for our traffic model will assume the completion of the Evansville-to-Indianapolis portion of I-69. This approach will ensure that our analysis consistently reflects the benefits and impacts of the specific project that is being analyzed in this study. In addition, to provide context for that analysis, we will separately present traffic data showing the additional traffic that would be generated by completion of the National I-69 project. This additional analysis of the traffic generated by the National I-69 project will be presented in Level 3 of the alternatives analysis in the Tier 1 EIS.

REGIONAL ECONOMIC GOALS

Comment: A highway in one part of the study area will cause economic harm in other parts of the study area. For example, a highway which serves Bloomington will cause economic harm to Vincennes and Terre Haute.

Consideration: The economic benefits and impacts of the various routes will be evaluated as part of the analysis of alternatives. –The results of that analysis are not yet available. However, previous studies have indicated that all parts of Indiana benefit from a major transportation improvement in one part of the state. Economic development is not a “zero sum game,” and increasing the capital stock of transportation infrastructure in one part of the state tends to increase, not decrease, prosperity in other regions.



We do recognize that there is considerable interest in the geographic distribution of economic benefits and impacts, both within and beyond the study area. To address this, we will enhance the regional economic model which analyzes the impacts of a new highway. Instead of simply forecasting the economic impacts of a project on the entire study region, the model will analyze the effects of projects on multiple regions within the study area. This will enable forecasts to be made of the effect of the highway on the economy in different parts of the study area.

Comment: A highway is an inefficient method to produce job creation. Other economic development programs can create jobs at a fraction of the cost of a new highway.

Consideration: The proposed I-69 project does not have job creation in one region as its only goal. There are also transportation, personal accessibility, and safety goals, as well as goals related to the National I-69 project.

In addition, the economic goals associated with this project are much broader than job creation. They include increases in personal income, increases in per capita income, employment diversification by industry, and employment in high-growth and high-wage industries. In addition to these personal economic indicators, project goals target business cost savings and business accessibility increases. All of these measures of individuals' economic well-being will be considered in evaluating alternatives for this project.

Comment: A highway which would take a lot of undeveloped land would cause significant harm to the agricultural economy in the study area. Agriculture is a major component of the study area's economy.

Consideration: This point is well-taken. One of the performance indicators will be the effect of each alternative on the region's farm income.

Comment: The Purpose and Need should not speak of "removing barriers to economic opportunity." The highway should not have any economic development purpose ascribed to it.

Consideration: The reference to removing "barriers" to economic opportunity has been removed from the Draft Statement of Purpose and Need. However, the Regional Economic Needs Analysis has demonstrated that the study area, and its rural counties in particular, are very stressed economically. For example, the United States Department of Agriculture's *Rural*



Development Strategic Plan for Indiana, Revised January 2001, noted the following: six of the eight Indiana counties with the worst unemployment over the last decade are in the study area; 11 of the 14 Indiana counties whose residents have the lowest effective buying income are in the study area; 10 of the 20 Indiana counties with the highest poverty rates are in the study area; and 12 of the 19 rural counties in the study area are rated as “stressed,” due to a variety of economic and social factors. Given the potential for transportation improvements to serve as an economic development engine, it is only prudent to evaluate the effect of this major transportation project on the region’s economy.

Comment: When forecasting economic development impacts, the effects of tax abatements offered to new businesses should be considered.

Consideration: We intend to perform a sensitivity analysis to determine if tax abatements would have a significant effect on economic development forecasts.

Comment: It is important to consider “Just In Time” (JIT) inventory practices in industry, and how they relate to the kind of transportation facility which is provided.

Consideration: This consideration is evaluated under Goal 6, Increase accessibility for Southwest Indiana businesses to labor, suppliers, and markets”. The performance measure, “One day freight access to buyer/supplier markets,” accounts for delivery schedules associated with JIT practices.

Comment: Increased opportunities for tourism in Southwest Indiana should be considered as part of the study.

Consideration: In the analysis of changes in personal income in the study area, a specific tourism analysis will be conducted. Estimated increases in visitor-days, and associated increases in employment and income, will be made for each alternative studied.

Comment: Improved access to the Crane Naval Warfare Center is a key to increasing economic development in the region.

Consideration: The economic development modeling system considers the location of existing employment centers as important factors in encouraging new development. Also, as part of the screening of alternatives, officials at Crane will be interviewed to determine what their



transportation needs are, and what kind of transportation improvements would particularly encourage spin-off increases in business.

Comment: Southwest Indiana residents prefer that it remain rural and undeveloped. If its residents wanted to be in a developed area, they would live elsewhere in the state. Economic development is not a need.

Consideration: The comments received during this process indicate a range of viewpoints in Southwest Indiana regarding economic development: some commenters support efforts to expand economic opportunities in the region, while others favor maintaining existing conditions as much as possible. This study will not resolve all of the underlying differences of opinion in Southwest Indiana about economic development. However, this study will provide new information about economic needs and the potential role of I-69 in meeting those needs. This study also should help to identify ways to strengthen the transportation system and expand economic opportunity while at the same time preserving the character of Southwest Indiana. INDOT and FHWA will carefully consider all of this information, as well as the comments received from the public, in making the decision about whether to proceed with this project and, if so, which route to select.

Comment: The highway should be located in the counties where the economic need is the greatest. This specifically applies to Vigo, Sullivan, and Knox Counties.

Consideration: The Needs Analysis in the Draft Statement of Purpose and Need shows that there are numerous counties throughout Southwest Indiana that are economically stressed, based on various measures of their current economic conditions. Based on that analysis, the goals of this project have been defined to include promoting economic development on a region-wide basis, rather than targeting specific counties.

Comment: The highway should serve as a catalyst for the development of high technology industries. Indiana colleges graduate large numbers of people with high technology skills, but many of these individuals leave the state to seek jobs elsewhere.

Consideration: Goal 7 of the Draft Purpose and Need is “Support sustainable, long term economic growth.” Two of the performance measures associated with this goal are employment in high-paying and high-growth industries. High technology employment is an important component of these types of industries.



Comment: All of Indiana will be linked to I-69. You would expect net economic gains beyond Southwestern Indiana. Forecasts should project economic benefit for the entire state.

Consideration: The economic modeling system for this study will forecast economic benefit both for the study area, as well as the entire State of Indiana.

Comment: INDOT should not ascribe any economic development purpose to I-69, and should delete language about “economic development” from the purpose and need statement.

Consideration: Using the transportation system to support economic growth is a fundamental element of both federal transportation policy and Indiana’s statewide transportation plan. In addition, the Needs Analysis for this project has demonstrated a need for economic development in the study area and indicated the important role of transportation in meeting such needs. In light of the federal and state plans and policies, as well as the results of the Needs Analysis, it would be imprudent to exclude economic development from the objectives of this project.

SCREENING METHODS

Comment: The Purpose and Need must not be “rigged” for or against a particular alternative.

Consideration: The process by which the Purpose and Need is determined safeguards against such a scenario. A Discussion Paper on the Purpose and Need was widely circulated for months in an effort to achieve public input and comment. Three public meetings on the Purpose and Need were held in August 2000, and others will be held in May, 2001. In all these venues, both the overall project goals, as well as performance measures associated with those goals, are receiving the widest distribution. The extensive public involvement in the development of the State of Purpose and Need (and in later stages of the study) will help to ensure that the screening process is both widely understood and fairly implemented.

Comment: The Purpose and Need Statement should reflect the goal of minimizing environmental impacts.

Consideration: The Purpose and Need Statement defines the goals of a project; it does not define all of the factors that will be taken into account in deciding how to achieve those goals. In this case, the Purpose and Need Statement defines three broad goals: strengthening the transportation network in Southwest Indiana, supporting economic development in Southwest



Indiana, and supporting the completion of National I-69. In evaluating alternatives, we will consider not only each alternative's ability to achieve these goals, but also the cost and environmental impacts associated with those alternatives. These issues of cost and environmental impact will be considered at a preliminary level in the alternatives screening stage (Level 2), when the 14 route concepts are reduced to a set of 3-5 alternatives. The issues of cost and environmental impact will then be studied in detail for the 3-5 alternatives that are carried forward for detailed study (in Level 3).

If a build alternative is chosen, it *will* have significant impacts. Depending upon which build alternative is chosen, these impacts may fall more on the natural environment, on the socio-economic environment, or on a combination of the two.

Comment: Benefits to Hoosier taxpayers should be specifically analyzed.

Consideration: The standard analysis methods, as part of INDOT's Major Corridor Investment Benefit Analysis System, determine increased income for Indiana residents as one measure of economic benefit.

Comment: Environmental impacts, cost, and community cohesion all should be included in the Purpose and Need.

Consideration: Environmental considerations and cost will be used as screening criteria to supplement goals in the Purpose and Need. At the screening stage, alternatives will be defined only at the corridor level, and it will not be possible to determine how they would affect community cohesion.

Comment: Using "accessibility" as a factor biases the process, because building new highways improves accessibility more than upgrading existing ones.

Consideration: The needs analysis demonstrated that, by a variety of measures, accessibility is a significant problem within the study area. This includes accessibility for its population, employment, major urban centers, and institutions of higher education. It is included, not to bias the analysis, but because it has been demonstrated as a need.



Comment: Certain performance measures are associated with more than one goal. This “double counting” will bias the analysis.

Consideration: These performance measures are not intended to be “added” to provide a single score or rating. There is no double counting inherent in including one under two goals. However, to eliminate any misperception, the Statement of Purpose and Need will show each performance measure associated with only one goal.

Comment: Issues 5 (Business Costs), 6 (Business Accessibility), and 10 (Efficient Movement of Freight and People) from the Purpose and Need Discussion Paper should not be included in the Purpose and Need.

Consideration: The needs analysis has demonstrated that economic development is a need in the study area. This development can be encouraged by making business more competitive by reducing business costs and making business travel more efficient, as well as by increasing business accessibility to suppliers and markets. These issues must be measured, because they are the factors which cause businesses to grow.

Comment: INDOT is making the Purpose and Need assume an inappropriate importance. It is the primary yardstick for selecting among alternatives.

Consideration: The Purpose and Need Statement is an important factor in the selection of alternatives, because an alternative that does not substantially satisfy the basic objectives of a project is not a reasonable alternative and need not be considered. However, Purpose and Need is not the primary or only yardstick for evaluating alternatives. Other factors, such as cost and environmental impact, also will be considered.

Comment: Only Issue 1 (Improve Travel Between Evansville and Indianapolis) from the Purpose and Need Discussion Paper should be included in the Purpose and Need. Issues 2 through 10 are not legitimate.

Consideration: All goals in the Draft Purpose and Need Statement are associated with genuine needs. All of these needs, grouped under the general heading of transportation, economic development, and the National I-69 project, can be addressed by a transportation project.



Comment: INDOT should take into account the number of people who favor particular alternatives in selecting an alternative.

Consideration: Public input is one important consideration. It will be especially important after costs, benefits, and impacts for various alternatives are forecasted. One of the goals of the study process is to disseminate accurate information on costs, benefits and impacts so that all may make informed input to the study process.

TRANSPORTATION GOALS

Comment: A goal of “improving the transportation network” is inappropriate, and biases the analysis. A new highway will significantly improve the transportation network, while upgrading existing highways will do little by comparison.

Consideration: There appears to be confusion as to how a transportation network may be improved. Adding capacity or upgrading existing roads can result in significant improvements to the transportation network. Two of the four transportation goals (Goal 3 - Reduce existing and forecasted traffic congestion on the highway network in Southwest Indiana, and Goal 4 - Improve traffic safety levels in Southwest Indiana counties with significantly above-average accident rates) have performance measures which roadway upgrade projects typically address. These performance measures include various indicators of congestion relief and accident reduction.

Comment: The project’s true purpose is improving the linkage between Evansville and Indianapolis.

Consideration: One important objective of this project is to provide a faster, more direct route for trips between Evansville and Indianapolis. But the project also is intended to address transportation and economic needs throughout Southwest Indiana, as described in the Purpose and Need Statement. For example, the project is intended to address the need for increased accessibility in large portions of Southwest Indiana – not just in Evansville. In short, while the project would connect Evansville and Indianapolis, it is being proposed as a *regional* improvement that addresses *regional* needs and would have *regional* benefits.

Comment: Linkages among a number of communities in the central part of the study area are important.



Consideration: Goal 2, “Improve personal accessibility for Southwest Indiana residents,” addresses these linkages. Performance measures associated with this goal include accessibility measures for centers of population, employment, and educational institutions.

Comment: Evansville needs much safer access to Indianapolis.

Consideration: A project goal is to reduce accidents in the study area.

Comment: An important goal should be to improve access to major educational institutions, such as Indiana University, the University of Southern Indiana, and the University of Evansville.

Consideration: As part of the transportation analysis, each alternative will be studied for how well it improved access to major educational institutions. Under Goal 2, “Improve personal accessibility for Southwest Indiana residents,”, each alternative will be evaluated against the measure, “Population within 1 hour of major educational institutions.”

Comment: Roadway safety is an important issue throughout the study area.

Consideration: The transportation needs analysis highlighted a number of areas in the study area where safety is a concern. Goal 4 of the Purpose and Need Statement is, “Improve safety levels in Southwest Indiana counties with significantly above-average accident rates.” It has several accident reduction and accident cost reduction performance measures.

Comment: I-69 should be routed to provide better linkage from the study area to Chicago.

Consideration: A stated purpose for this project is to link Evansville and Indianapolis. While it is possible that such a project also could provide better linkage to Chicago, it would be inappropriate to attempt to have one project seek to provide linkages to two very different destinations (Chicago and Indianapolis).