



Chapter 11—Comments, Coordination and Public Involvement

Since the Draft Environmental Impact Statement (DEIS), the following substantive changes have been made to this chapter:

- Section 11.1 – Discussed the publication of the DEIS and the public hearing on that document.
- Section 11.1 – Added information regarding the fifth CAC meeting.
- Section 11.2.2 – Issues raised in comments on the DEIS have been added.
- Section 11.3.1 – Updated **Table 11-1** to include more recent public outreach activities.
- Section 11.3.2 – Added information about the fifth CAC meeting.
- Section 11.3.3 – Added information about the Public Hearing and updated **Table 11-2**.
- Section 11.3.5 – Updated **Table 11-3**.
- Section 11.3.7 – Updated staffing hours for Section 4 project office.
- Section 11.4.2.2 – Added information about the submission of the Biological Assessment to the USFWS.
- Section 11.4.2.2 – Added information regarding Section 106 consultation meetings and Indiana Department of Natural Resources (IDNR) Division of Historic Preservation and Archaeology (DHPA) correspondence.
- Section 11.4.2.2 – Updated **Table 11-4**.
- **Figure 11-1** – Updated.

11.1 Introduction

The Federal Highway Administration (FHWA) and Indiana Department of Transportation (INDOT) have provided opportunities for agency and public involvement in the development of this Final Environmental Impact Statement (FEIS). Several opportunities and methods were used to involve the public in the study and streamline coordination with agencies (See **Figure 11-1**, p. 11-77). The project newsletter, hotline, website, outreach meetings, and other means were used to solicit input. In addition, a local project office in the City of Bloomington has been staffed and open to the public during weekday business hours to allow convenient public access to project team members and materials. Public and agency input was also sought at key milestones in this Tier 2 study. They are listed below:



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- **In June 2004 INDOT hosted several events to familiarize the public with the Tier 2 Studies.** The activities included an open house to acquaint the public with the new local project office; introduce project staff; and provide the public with project information. A similar meeting was held for public officials to provide them with project information and to receive input from area decision makers. INDOT also hosted a media-briefing event to educate the media on the Tier 2 studies.
- **State and federal resource agency meetings were held.** An initial meeting was held August 12, 2004, to update the coordinating agencies on the status of the six Tier 2 studies and introduce project team members. Additional meetings (February 23-24, 2005, August 1-2, 2006, March 1, 2007, and April 30, 2009) have been held throughout the studies including progress updates and field reviews. On December 19, 2005, a meeting for review agencies was held to review the Purpose and Need Statement and preliminary alternatives for Section 4. On August 31, 2006, a meeting for review agencies was held to review the alternatives evaluation and screening process for Section 4.
- **A Community Advisory Committee (CAC) was developed in the fall of 2004.** The committee was developed to facilitate communication between project team members and representatives of potentially impacted and key constituent groups in the project area. Through a series of five meetings on December 2, 2004, April 7, 2005, June 2, 2005, November 10, 2005, and August 24, 2010, committee members learned details of the project and provided feedback on such subjects as community access, local needs, and development of alternatives.
- **Public Information Meetings were held to share project information with the public and receive feedback.** On June 16, 2005, a meeting was held to present Preliminary Alternatives and receive input regarding local needs related to the project. A second public information meeting was held on November 16, 2005, to present refined alternatives for public input. At that time the draft Purpose and Need Statement was also made available for public comment. In addition to displays of the alternatives at each of these meetings, a presentation was made to update the public on the progress of the project and describe how the alternative options presented were derived. The public was able to provide verbal comments following the presentation, and comment forms were available with other handouts throughout the meetings. Project staff interacted one-on-one with the public, answering questions regarding map displays and other issues, and taking notes of comments.
- **A public hearing was held on August 26, 2010 shortly after the release of the DEIS.** The hearing allowed the public to review displays depicting the Preferred Alternative identified in this document and provide their verbal and/or written comments. Project staff was again available to discuss one-on-one with the public how the Preferred Alternative was developed and to note input.

During this highly public and highly participative process, several issues were raised that were considered in preparing this FEIS. Section 11.2 describes these issues. Section 11.3 summarizes the public and community outreach process. Section 11.4 summarizes the coordination process with federal and state agencies.



11.2 Summary of Major Comments and Responses

Major questions and issues were raised throughout the study – both prior to the publication of the DEIS, and during the public comment period on the document. These major issues are grouped by the time period which they were first raised: Section 11.2.1 summarizes issues raised prior to the issuance of the DEIS and Section 11.2.2 summarizes comments on the DEIS and INDOT’s responses to the comments.

11.2.1 Issues Raised Prior to the DEIS

11.2.1.1 Local Access and Public Road Connectivity

Major questions and issues have been raised before the issuance of the DEIS. The need to provide controlled access to Interstate systems at designated interchanges can result in the severance and closure of local public roads, thereby requiring motorists to change familiar routes and find new routes to familiar destinations. This could be a significant adjustment for emergency responders, along with the business, residential, and farming communities in the project area. The change in travel patterns related to road closings could produce longer trips and slower response times for emergency responders. And for farmers and businesses such as limestone quarries that have large, slow-moving equipment, added distance means added time and reduced productivity.

Local farmers and emergency responders have joined area residents, business owners and others in voicing their concerns about road closings and expressing their opinions about which roads should remain open. Grade separations and road closures proposed in the preliminary planning stages were shown to the public to elicit comment and advice. Public input resulted in the following items being included as components of the Preferred Alternative:

- **Greene County Access Road 4:** In order to maintain north-south connectivity between Owensburg (to the south) and Hobbieville (to the north), CR 1250E south of I-69 will be relocated and connected to SR 54 via this new access road. The road was included as part of the Preferred Alternative after many members of the community expressed their concerns to project staff during public meetings, office visits, and in written correspondence about traveling on CR 1250E. Currently, CR 1250E is gravel and very steep in either direction where the proposed I-69 will cross. Public input suggested that it is already extremely difficult for residents to travel CR 1250E in the wintertime, so this access road was developed to ensure residents maintain vehicular mobility in this section of the corridor.
- **Monroe County Road Victor Pike:** Local business owners identified the importance of this signalized intersection with SR 37 early during the project development. In particular, representatives from a gas station and industrial park in this vicinity stated they were dependent on the signalized intersection in order to maintain and/or expand their businesses. Furthermore, a representative of a local quarry stated that the Victor Pike/SR 37 intersection is crucial to their shipping operations. To address the concerns raised by the public, all alternatives under a build condition contain an intersection configuration that will maintain the Victor Pike/SR 37 intersection in its current form.



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11.2.1.2 Farmland Impacts

Historically, farming has been an important industry throughout the project area and the state of Indiana as a whole. Approximately 29% of the land in the project corridor has been identified as agricultural use. Within Section 4 of the corridor, some families farm the land on which they live, while others lease their fields to tenant farmers, including family members. The importance of farming was emphasized throughout the public participation process. The majority of farmland owners within the corridor have participated in one or more ways in the public involvement process, through visits to the project office, attendance at one or more public information meetings, and/or submittal of written comments about the project. In addition, there is one local Indiana Farm Bureau representative on the CAC—representing Greene County—and a representative of the Greene County Agricultural Extension Services.

One of the top priorities expressed by the local farming community regarding the development of alternatives has been to avoid where possible, or minimize where unavoidable, the creation of farmland severances and uneconomic remnants.¹ There were many comments asking that farms not be diagonally split.

Another major concern echoed by most of the farming community has been the need to have access to fields, many of which are not contiguous to the farmstead but are scattered through the project area. Presently, most farms have access to public county roads over which heavy farm equipment can reach farm parcels at a distance from the main farmstead. The message of most farmers has been this: provide enough interstate overpasses of sufficient width on county roads to enable us to move our equipment from one side of the interstate to the other.

While direct impacts on farmland will result from the acquisition of farmland for right-of-way needed for road construction (See Section 5.4, *Farmland Impacts*), extensive efforts have been made to avoid or minimize severances, and to facilitate access to farm fields via overpasses that are conveniently located and spaced, and wide enough to accommodate large farming equipment.

11.2.1.3 Interchange Areas

Throughout the Tier 2 Section 4 public involvement process, accessibility has been one of the topics most often raised by local residents in Section 4. Access for local residents and communities has been highlighted as a key factor to be considered in choosing the final alignment for I-69 Section 4. The most frequently identified accessibility issues are summarized below. The majority of the concerns are focused on the Greene/Monroe County Line interchange.

- **SR 45 Interchange:** The I-69 Evansville to Indianapolis Tier 1 Study identified a potential interchange at SR 45 near Cincinnati. During Section 4's Tier 2 public involvement process, the Greene County Commissioners and Council requested that the SR 45 interchange be included in the Preferred Alternative. Many letters and website comments also have been

¹ A "severance" refers to dividing a tract of land now farmed by a single farmer. An "uneconomic remnant" is a small, often oddly shaped parcel created by acquiring right-of-way for a highway. It derives its name from the fact that its small size and/or shape make it uneconomic to plant or harvest using farm machinery.



received from citizens and interested individuals with the same request. The interchange is considered necessary to serve the north gate at the Crane NSWC facility. Crane NSWC has a large number of workers and delivery trucks using the north gate, and this interchange will increase the efficiency of traveling to and from, as well as shipping into and out of the base.

- **County Line Interchange:** The I-69 Evansville to Indianapolis Tier 1 Study did not identify a potential interchange in the Greene/Monroe County Line area. Elected officials from Greene and Monroe counties, the CAC, and members of the public requested an interchange near the county line to ease traffic along existing SR 45 and provide an access point to I-69 in a convenient location. The traffic model for the project was used to determine the traffic predicted to use this interchange. The model showed an Average Daily Traffic (ADT) of almost 6,000 vehicles using this interchange by 2030. Due to the high traffic numbers, it was decided to include this interchange in the Preferred Alternative. The interchange was also included to provide an access point for emergency responders.

11.2.2 Issues Raised in Comments on the DEIS

During and subsequent to the comment period on the DEIS, many issues similar to and in addition to those described in Section 11.2.1 were raised. Comments on the DEIS were received from:

- Federal agencies:
 - US Department of the Interior, Office of Environmental Policy Compliance
 - US Environmental Protection Agency, Region 5, Office of Enforcement and Compliance Assurance
- Tribal agencies:
 - The Delaware Nation
 - Peoria Tribe of Indians of Oklahoma
- State agencies:
 - Indiana Department of Natural Resources, Division of Historic Preservation & Archaeology
 - Indiana Department of Environmental Management, Office of Water Quality
 - Indiana Department of Natural Resources, Division of Fish and Wildlife

Comments were also received from representatives of 21 local government units, 7 public organizations, and 786 individuals. Form letters prepared by a local organization and which included standardized comment boxes, were received from 437 individuals/families. Three-hundred seventeen (317) of the form letters also included additional comments on the project. Substantive comments² submitted on the DEIS can be categorized as follows:

- Tally of Impacts and Tracking of Impacts and Mitigation (Section 11.2.2.1)
- Alternatives Evaluation and Selection of Preferred Alternative (Section 11.2.2.2)
- Purpose and Need (Section 11.2.2.3)
- Air Quality (Section 11.2.2.4)

² Comments not considered “substantive” included those that only noted preference for or opposition to the project, without elaboration; and comments that did not relate specifically to the Tier 2 Section 4 study.



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- Noise (Section 11.2.2.5)
- Water Resources (Section 11.2.2.6)
- Threatened and Endangered Species (TES) / Other Wildlife Issues (Section 11.2.2.7)
- Indirect Impacts (Section 11.2.2.8)
- Section 106 Resource and Section 4(f) (Section 11.2.2.9)
- Local Access and Public Road Connectivity (Section 11.2.2.10)
- Neighborhood and Socio-Economic Impacts (Section 11.2.2.11)
- Funding / Costs (Section 11.2.2.12)
- Greene County/Monroe County Line Interchange (Section 11.2.2.13)
- Karst Resources (Section 11.2.2.14)
- SR 37 Traffic (Section 11.2.2.15)
- Construction Impacts, Mitigation and Permitting (Section 11.2.2.16)
- Design Criteria (Section 11.2.2.17)
- Tier 1 Issues (Section 11.2.2.18)
- Additional Agency Input (Section 11.2.2.19)

INDOT prepared responses to all substantive comments in a *Comments and Responses (C/R)* document. Federal and state agencies that submitted comments on the DEIS were given an opportunity to review and comment on the C/R document (see Section 11.2.2.19). The final C/R document is provided in Volume III, Part A, of the FEIS. The full texts of all substantive comments made on the DEIS are provided in Volume III, Part B. In addition to the comments on the DEIS, many other written comments were provided during the DEIS comment period which addressed the Tier 1 study. These are not substantive comments on the Section 4 DEIS and no responses are provided. The comments are included in Volume III, Part C, of the FEIS.

Following is a summary of the major issues raised by commentators on the DEIS and how they were addressed in preparing this FEIS.

11.2.2.1 Tally of Impacts and Tracking of Impacts and Mitigation

USEPA recommended disclosure of “the overall direct and indirect impacts associated with the entire 140-mile-long I-69 Indianapolis to Evansville Alignment identified in the Tier 2 studies.”³, and further advised that a method was needed to keep track of impacts and compensatory mitigation measures of each Tier 2 section. The agency has further noted that tracking is needed “to insure that adequate mitigation occurs for all losses incurred in each Tier 2 Section and throughout the entire I-69 (Indianapolis to Evansville) project.”⁴ The agency further stated that “{w}ithout a well-designed mechanism to track impacts and account for their mitigation, it is uncertain whether impacts to resources of concern will be adequately compensated for...”⁵ The agency recommended that the explanation of the method be included in Tier 2 EIS documentation.

³ See USEPA letter dated August 31, 2006 in Appendix C.

⁴ See USEPA letter dated February 20, 2007 in Appendix C.

⁵ See USEPA letter dated February 20, 2007 in Appendix C.



FHWA does not believe that a “tally” of direct and indirect impacts is required by NEPA in the Tier 2 EISs for the entire I-69 Evansville-to-Indianapolis project as approved in Tier 1. 40 CFR Section 1502.20 states that “...the subsequent statement...need only summarize the issues discussed in the broader statement and incorporate discussion from the broader statement by reference and shall concentrate on the issues specific to the subsequent action.” However, FHWA and INDOT have agreed to provide a tally of direct impacts in each section’s Tier 2 FEIS, for informational purposes only (see **Appendix KK**, *Tier 1 – Tier 2 Impact Comparison*). The values provided are the latest available estimates published in a NEPA document at the time of the approval of the FEIS. The tally does not include indirect impacts, since adding up the indirect impact estimates for each Tier 2 section would result in significant “double counting”, i.e., study areas of adjacent sections often overlap, and indirect impacts cannot meaningfully be segregated by Tier 2 section. All indirect impacts resulting from I-69 within the study area of each section are included in that section’s EIS (see Chapter 5.24, *Indirect and Cumulative Impacts*). The tally of impacts for Section 4 includes impacts to karst features as requested by USEPA.

As recommended by USEPA, an overall I-69 direct impacts/permitting/mitigation tracking method has been developed in consultation with permitting agencies and USEPA. It is tracked within a GIS database. INDOT has consulted with agencies to identify agency-specific information to be included in the database for tracking. INDOT provides to permitting agencies and USEPA a tracking summary on an annual basis. The summary identifies the permitting and mitigation commitments and describes the status of the activities-to-date associated with each commitment.

11.2.2.3 Purpose and Need

The purpose of the project in Section 4 is to advance the overall goals of the I-69 Evansville to Indianapolis project in a manner consistent with the commitments in the Tier 1 ROD while also addressing local needs identified in the Tier 2 process. Five Tier 2 goals were established to meet the identified needs for Section 4. These goals are identified in Chapter 2.5.

Several comments were received from public organizations and individuals with regards to the ability of the Section 4 project to satisfy the Tier 2 Purpose and Need goals. Specifically, these comments were about the ability of the project to increase personal accessibility for area residents, to reduce traffic congestion, to improve safety, and to support local economic development initiatives within the Section 4 study area.

The end-to-end alignment alternatives in Section 4 have similar and comparable lengths, and are evaluated on the basis of impacts and costs. The Section 4 interchange options vary in the degree to which they satisfy the purpose and need of the project. In order to evaluate the effectiveness of the project to meet the Tier 2 goals, specific performance measures were established, as identified in Section 2.5. The analysis of these performance measures was made to determine the performance of the different interchange options on purpose and need. The findings of the analysis of these performance measures are presented in Chapter 3.3.

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A few of the purpose and need comments questioned the ability of the project to increase local accessibility due the closure of some local roads, as well as the limited access nature of the highway. As discussed in Chapter 3.3.1.1, all interchange options provide a significant level of improved accessibility to population and employment centers served by Section 4, and thereby satisfy Tier 2 Goal 2 on accessibility. It should be noted that Goal 2 of the Section 4 Purpose and need measures access to “regional destinations” (Evansville, Bloomington and Indianapolis), not access to “local destinations.”

Several purpose and need comments were about congestion which is addressed under Tier 2 Goal 3. Some of these questioned whether congestion relief along SR 45 is appropriate as a selection criterion for interchange options which include the Greene County/Monroe County Line interchange. As discussed in Chapter 3.3.1.2, all five interchange options will reduce congestion for the Section 4 study area. Furthermore, Interchange Option 1 will have the greatest reduction in congestion. This interchange option consists of interchanges at SR 45 and Greene County/Monroe County Line and is the interchange option for Refined Preferred Alternative 2. The Greene/Monroe County Line interchange provides the greatest benefit to SR 45 between the SR 445 intersection near Cincinnati in Greene County and Curry Pike/South Leonard Springs in Monroe County. Traffic diversions from SR 45 to I-69 at the Greene County/Monroe County Line interchange do occur because I-69 offers travel time benefits to drivers. The model takes into account many variances in trip origins and destinations, and identifies those trips for which access at the County Line Interchange offers a travel time savings.

The most cited purpose and need comment on safety was about the crash rates that were used in the safety analysis for Tier 2 Goal 4. Subsequent to the completion of the DEIS, more current crash rates were identified and the safety analysis presented in Chapter 3.3.1.3 was updated. This updated analysis concluded that annual crashes in the 5-county study area for Section 4 will increase slightly, due to a nearly 20% increase in travel within the study area. This increase is due to the diversions of significant travel from outside of the study area. However, crash rates (crashes/miles traveled) are reduced significantly, since I-69 is much safer than other state highways.

Several comments were received about the purpose and need goal of the project to support local economic development (Goal 5). As discussed in Chapter 3.3.2, each interchange option would provide a similar and substantial reduction in total distance and travel time to employment centers and business markets. Improving access to the interstate system would allow workers to choose from a wider selection of employers and provide businesses with a wider pool of qualified employees from which to choose. This improved access also provides businesses with a larger customer base, both for sales to consumers and to other businesses. Reducing travel time to regional destinations will also help achieve this goal. Land use and transportation planning initiatives in the Section 4 Study Area identify I-69 as a catalyst for development that can serve to support clearly-defined local economic plans.



11.2.2.4 Air Quality

In its comment letter, USEPA noted that Greene County is a designated maintenance area for the eight-hour ozone standard and that the County is currently in attainment of the standard and is under an approved maintenance plan. The USEPA reiterates that the DEIS identified that the conformity determination requirements for the I-69 project in Greene County will be determined after further agency consultation. The USEPA also indicated that the FEIS/ROD will include the regional and project level conformity demonstration updated as appropriate to reflect the proposed implementation timeline. It is suggested that the results of any conformity analysis be discussed in the FEIS. Additional USEPA comments were received relative to reducing emissions from equipment during construction.

A conformity demonstration for Greene County, Indiana's 8-hour ozone maintenance area for the I-69 Tier 2 Section 4 Final Environmental Impact Statement (FEIS) was completed in December 2010. The conformity demonstration found that the I-69 Section 4 Tier 2 FEIS demonstrates conformity to the State Implementation Plan budgets as required by the conformity rule. FHWA, IDEM and the USEPA completed their reviews and found that the analyses and documentation meet the criteria outlined in the conformity rule. For more details regarding the analysis and FHWA, IDEM and the USEPA comments see **Appendix MM**, *Greene County Air Conformity*.

INDOT's Standard Specifications (General Conditions) require contractors to follow all local state and Federal laws and regulations applicable to this project. Some of these govern emission controls for construction equipment. At present, INDOT's construction policies satisfy all federally-mandated emission criteria for diesel-fueled construction.

Local government comments expressed concerns about potential air quality impacts in Bloomington and Monroe County. The FEIS demonstrates that Monroe County will not be adversely affected by CO or MSAT emissions related to I-69, and the particulate matter (PM) monitoring data cited actually indicates that PM is at healthy levels, and actually are the lowest such levels monitored within the State of Indiana. No further analysis was considered necessary, given that these analyses indicate that I-69 will not adversely impact air quality within Monroe County and the fact that monitoring data suggests that Monroe County is not facing any air quality problems. The FEIS also includes a CO hotspot analyses within Monroe County both for a free-flow section of I-69 as well as for the interim interchange with SR 37. Both of these analyses indicate that even immediately adjacent to I-69 and/or SR 37, carbon monoxide levels will remain well below the NAAQS. Regarding air toxics or MSATs, the increase in Monroe County traffic expected with I-69 is shown in **Table 5.9-2** and discussed in the qualitative analysis of these emissions proscribed by FHWA guidance and documented in Chapter 5.9.6. The analysis concludes that MSATs will likely be at or lower than present levels in the design year, despite the forecasted increase in VMT in Monroe County, citing FHWA findings using USEPA's emission model that MSATs will decrease significantly despite significant increases in traffic due to existing mobile source control programs regulating fuels and vehicle technology. IDEM's Indiana PM 2.5 Summary (2000-2009) indicates that the PM monitor in Monroe County (IDEM CAMS 69, site #181050003) has the lowest daily site design value anywhere in Indiana. The annual NAAQ standard cited in the comment establishes an annual average representing



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maximum healthy levels of long term exposure to PM. The annual average in Bloomington is well below this standard.

11.2.2.5 Noise

Many comments were received from representatives of local government, public organizations, and individuals about noise. These comments were about noise impacts in general, the accuracy of the noise modeling, and noise mitigation. The majority of the comments were expressed about potential noise impacts to receptors in the Rolling Glen Subdivision. A few comments were also received about potential noise impacts upon historic properties.

As part of the FEIS, a Highway Traffic Noise Analysis was performed in accordance with the Indiana Department of Transportation *Traffic Noise Policy (2007)* and the *Traffic Noise Analysis Procedure (2011)*. The Highway Traffic Noise Analysis provided a comprehensive description and evaluation of the existing noise levels, the predicted Future No-Build noise levels, and the predicted year 2030 noise levels, as well as a detailed Highway Noise Mitigation Assessment for the predicted year 2030 traffic noise impacts. Highway traffic noise abatement measures evaluated included traffic management measures, alteration of horizontal and vertical alignments, acquisition of buffering land, noise insulation of public use or nonprofit institutional structures, and/or construction of traffic noise barriers. Highway Traffic Noise Mitigation will be provided in areas where the traffic noise abatement measures evaluated met the criteria to be considered both “reasonable” and “feasible”. A commitment has been made in the FEIS that additional noise analysis will be performed during the design phase to more accurately determine barrier performance, barrier characteristics (length and height), and the optimal barrier location for any potential noise barriers that may be recommended for noise abatement.

Under the reasonableness criteria, the viewpoints of the affected property owners and residents are solicited to contribute to the decision-making process. This was completed in accordance with INDOT’s *Traffic Noise Analysis Procedure (2011)*. A packet of information was mailed to each benefitted resident on April 22, 2011. The packet included a letter of explanation, a pamphlet on the basics of traffic noise, a survey, and maps for barriers under consideration. Copies of these items are included in **Appendix X**, *Final Noise Technical Report*. Recipients were given a set deadline to return the survey of May 6, 2011. A second mailing was distributed on May 7, 2011 to any benefitted resident that had not yet responded. The deadline to return the second survey was May 23, 2011. Details of the survey can be found in Chapter 5.10.

Several comments were received that pertained to noise effects upon historic properties. Refer to Section 11.2.2.9 for additional information.

11.2.2.6 Water Resources

The DOI commented that the DEIS Preferred Alternative for Section 4 demonstrates a reasonable effort to avoid impacts to natural resources, including minimizing habitat fragmentation and impacts to karst features. The DOI noted that the USFWS favors the bridging entire floodplains. As noted in FEIS Section 5.19, at the crossings of streams where floodplains are present, portions of the floodplains will be bridged.



The USEPA’s DEIS comments pertaining to water resources generally related to interchanges and indirect impacts to water quality and public health, wetlands and open water impacts, stream impacts and mitigation and compensatory mitigation.

The USEPA stated that stream impacts are the major aquatic issue for Section 4 and that overall stream quality was understated and needs more attention in the FEIS. The USEPA requested that specific locations and structures to reduce stream impacts at specific stream reaches be clearly depicted in the FEIS and noted that special attention should be given to sedimentation control for construction impacts. The USEPA requested that Best Management Practices (BMPs) suited to Section 4’s resources be identified and used. Regarding specific locations and structures, such specific information will not be determined until final design after the FEIS and ROD. Tables of preliminary recommended structure types from the Draft Engineers Report (2010) are included in FEIS **Appendix M**, *Final Stream Assessment Report*, and a reference was added to Section 5.19. Best Management Practices (BMPs) and Rule 5 will be followed. Additional information pertaining to BMPs to be considered for implementation was added to Section 5.19.2.4.

The USEPA expressed concern for potential indirect water quality effects relating to an “additional” interchange and resulting increased accessibility to southwest Monroe, eastern Greene and northwest Lawrence Counties, as compared to interchanges discussed in Tier 1 documents. The Tier 1 EIS identified two proposed intermediate interchanges in Section 4 between US 231 and SR 37 (See Tier 1 FEIS, Figure 6-20 (p. 6-61). While the Greene/Monroe County line interchange was added for consideration, it is proposed as a replacement for one of the proposed interchanges in Tier 1. This is clarified in FEIS Sections 3.2.2.3 and 3.4.2.

The USEPA expressed concern for the potential for impacts to waters and/or wetlands located near the construction limits but not directly impacted by construction. All water resource areas within the right-of-way that are not impacted by construction will be identified on the design plans and these areas will have erosion control measures approved by IDEM. These will be part of the overall erosion control plan for the roadway project to prevent any filling or contamination of these areas during construction of the Section 4 project. This commitment is noted in FEIS Section 5.19.2.4 and Section 7.3.9.

The USEPA requested that discussion of ongoing stream mitigation related work be reflected in the FEIS. The USEPA noted that while wetland and forest mitigation requirements are calculated in acres, it requested that stream mitigation requirements be calculated in linear feet and should include both banks of a stream. Additional mitigation information is included in the FEIS and also defined in the Biological Assessment (BA) which is included as FEIS **Appendix JJ1**, *Redacted Section 4 Tier 2 Biological Assessment*. Stream impact mitigation requirements were calculated on a linear foot basis and mitigation needs will be coordinated with both the USACE and IDEM during the permitting process of the Section 4 project. Wherever possible, both banks of stream mitigation areas will be protected.

The USEPA commented that the FEIS discussion of stream impacts should not be based solely on linear feet of impacts, and that the habitat quality of affected streams should be considered. Discussion of the habitat quality affected by the Section 4 alternatives has been incorporated into

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FEIS Sections 5.19.2.3, 5.19.2.4 and **Table 5.19-6a**, and FEIS **Appendix M**, *Final Stream Assessment Report*.

The USEPA also suggested clarification in the FEIS that USEPA Class V injection well permits may be required for various types of projects. The requested clarification regarding Class V injection well permits was included in FEIS Section 5.19.2.4.

IDEM recommended that consideration be given in the design phase to planting trees and shrubs along relocated streams and the outside right-of-way edge. A commitment for consideration of tree and shrub planting along relocated streams and the outside right-of-way edge, as well as a separate commitment for evaluation of measures for bank stabilization, reinforcement and erosion control in final design of the South Connector Road bridge over Indian Creek to minimize natural channel migration, were included in the Section 5.19.2.4 of the FEIS.

The IDNR suggested that consideration be given during the design phase to the use of armoring materials other than riprap. The use of bio-engineering techniques to provide natural armoring of stream banks will be considered and implemented where practicable. Installation of riprap will be limited to areas necessary to protect the integrity of structures being installed. Riprap may also be needed above the (OHWM) to protect bridge piers and abutments from scour where bio-engineering will not suffice. Commitments relating to stream bank armoring were added to FEIS Section 5.19.2.4 and FEIS Section 7.3.12.

11.2.2.7 Threatened and Endangered Species (TES) / Other Wildlife Issues

The DOI commented that the DEIS Preferred Alternative for Section 4 demonstrates a reasonable effort to avoid impacts to natural resources, including minimizing habitat fragmentation and impacts to karst features. The DOI noted that the USFWS strongly supports the proposed development of wildlife crossing throughout Section 4 project; minimizing habitat gaps and barriers to wildlife movement is very important because of the rural and densely forested nature of this part of the project area.

IDNR made several recommendations related to the locations of proposed wildlife crossings, as well as minimum design criteria for consideration with bridges and culverts. IDNR recommended deer exclusion fencing in conjunction with crossings. IDNR recommended other appropriate mitigation measures be implemented where the highway crosses significant habitat area, including placing any lights on the shortest poles possible to limit the spread of light and shielding the light so it only shines on the highway and not up or out from the road. Wildlife crossings and wildlife crossing related commitments are discussed in detail in FEIS Section 5.18.4 and FEIS Section 7.3.13. As noted in the Sections 5.18.4, 7.3.6 and 7.3.13, any highway/interchange lighting will be at least 40 feet above the highway in order to minimize collisions between bats and vehicles. Non-diffuse lighting will be used when possible.

A public individual commented that the cerulean warbler (*Dendroica cerulean*) and the hooded warbler (*Wilsonia citrina*) should be added to the Section 4 list of species discussed in FEIS Section 5.17, and provided a recent survey covering area in and near the project area which indicated that Henslow's sparrows (*Ammodramus henslowii*) are present in the study area. A



report of the survey results is provided as part of comment PI662-01 in Volume III of this FEIS. FEIS Section 5.17.3.3 discussions regarding the potential for species occurrence and potential impact have been updated accordingly.

In response to IDNR comments, INDOT and FHWA will continue to coordinate with IDNR with regard to potential impacts upon eastern box turtles.

11.2.2.8 Indirect Impacts

The EPA's comments on the Section 4 DEIS requested additional spatial and narrative information for potential karst resource and water quality impacts in the areas of anticipated induced growth resulting from the construction of I-69. In anticipation of induced growth resulting from the construction of I-69, a planning grant program was created by INDOT and made available to planning officials in the project vicinity. To address the EPA's induced growth comments, the following narrative and spatial items were added to FEIS Section 5.24 since the Section 4 Tier 2 DEIS:

- Details of local public agency comprehensive plans developed through the I-69 Planning Grants Program are included in the karst discussion (Step 9) of Chapter 5.24.3, *Indirect and Cumulative Impacts*.
- Soil septic absorption suitability maps for Greene and Monroe Counties are included in Chapter 5.24 as **Figure 5.24-4**.
- Environmentally sensitive area maps for Greene and Monroe Counties are shown in Chapter 5.24 on **Figure 5.24-5**. These maps show environmentally sensitive (karst) areas in relation to the TAZs with anticipated growth from I-69.
- A map showing existing sanitary sewers serving the areas with anticipated induced development/growth from I-69 (Bloomington/Monroe County) was included in Chapter 5.24 as **Figure 5.24-6**.

Identification of state, county and local government agency laws and ordinances in place that are anticipated to lessen somewhat the negative effects of induced growth upon drinking water supplies are included in the karst discussion (Steps 7 and 9) of Chapter 5.24.3. This section of Chapter 5.24.3 includes information about soil septic absorption (**Figure 5.24-4**), environmentally sensitive karst areas (**Figure 5.24-5**), and sanitary sewers serving anticipated growth areas (**Figure 5.24-6**).

11.2.2.9 Section 106 Resources and Section 4(f)

The USDOJ concurred with FHWA and INDOT that there are no public park/recreation or refuge properties eligible to be considered under Section 4(f) of the Department of Transportation Act of 1966 (48 U.S.C. 1653(f)). The USDOJ acknowledged that none of the historic properties eligible for inclusion in the National Register of Historic Places in the project area were found to be adversely affected by the project. The USDOJ indicated that the Draft EIS adequately documented appropriate consultation for these properties and had no further comments regarding Section 4(f).

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The IDNR-DHPA issued a comment letter on the DEIS on October 26, 2010. The SHPO agreed with the findings relating to aboveground historic resources but requested additional information on archaeological investigations. Further archaeological studies were performed since the DEIS, the results of which are discussed in FEIS Section 5.14. In a letter dated February 15, 2011, the SHPO concurred with the Adverse Effect finding for the undertaking and agreed with the previously-identified historic properties and with the archaeological districts identified. The SHPO also concurred that the archaeological sites impacted within the archaeological districts do not warrant preservation in place.

Several consulting party and public comments were received suggesting that the Dowden Farm in Greene County should be considered as eligible for listing on the National Register of Historic places. In follow up to such comments, the Keeper of the National Register of Historic Places was asked to determine whether this is a National Register-eligible resource. FEIS Section 5.13.2.6 documents that the Keeper determined that this farmstead is not National Register-eligible.

Public comments expressing objection to the assessment of auditory effects upon National Register listed and eligible properties were received. The comments suggested that the project would cause adverse auditory effects. As explained in FEIS Section 5.13.4, adverse auditory effects occur when a noise impact is predicted; i.e., when noise levels approach or exceed applicable noise abatement criteria. No noise impacts were predicted for historic properties.

11.2.2.10 Local Access and Public Road Connectivity

Access and connectivity issues continued to be prominent topics of commentary after the issuance of the DEIS. In the DEIS and at the Public Hearing, options regarding access decisions were displayed and explained in detail for the following six local roads. Each of these six local roads was shown with an “optional” grade separation, meaning that consideration was being given to closing them at I-69:

- Dry Branch Road (CR 750E and CR 900E)
- Mineral-Koleen Road (CR 360S and CR 880E)
- Burch Road
- Evans Lane
- Harmony Road
- Bolin Lane

The greatest number of DEIS comments about the Section 4 project from representatives of local government, public organizations, and individuals were about these possible road closures, especially Harmony Road and Bolin Lane in Monroe County. Comments included, in part, concerns about access to properties by emergency services; increased travel distance and time to/from places of employment, schools, commercial and service businesses, churches, and medical faculties; increased travel time and distance for school buses; effects upon property values; rerouting of travel to roads that occasionally flood; and the loss of use of these roads for bicycle travel.



The options to either maintain travel along these local roads by construction of a grade separation or to close these roads at I-69 were evaluated in the FEIS. The evaluation included detailed engineering development of the highway, traffic volumes, travel patterns, (including school bus and emergency vehicle access), potential environmental impacts and costs as well as resource agency, local government, and public comments. As discussed in detail in Section 5.6.3.2, INDOT has determined that local travel will be maintained by the construction of grade separations at Dry Branch Road and Mineral-Koleen Road in Greene County and at Burch Road, Harmony Road, and Bolin Lane in Monroe County.

Evans Lane, however, will be closed. This decision was based upon a detailed study that is included in **Appendix Z**, *Documentation of Local Access Decisions*. The decision to close this road is supported by representatives of local government and property owners in the Evans Lane neighborhood.

Several comments from representatives of local government, public organizations and individuals were received about the proposed grade separation at CR 200E and the proposed closing of CR 215E in Greene County as presented in the DEIS. These comments included, in part, concerns about the disruption of primary travel patterns in this area, access by emergency service vehicles, flooding, increased travel via a substandard local road (CR 600S), and property access. In consideration of these comments and further evaluation of the engineering, traffic, environmental affects, and costs, INDOT has decided that CR 200E will be closed at I-69 and travel along CR 215E will be maintained by the construction of a grade separation. Additional discussion about these two roads is included in Section 5.6.3.2.

A few comments were received from representatives of local government and public individuals about the proposed closing of Taylor Ridge Road (CR 440E and CR 475E) and CR 450S in Greene County. The primary concern was about modifications that would be required for school bus travel in this area. A detailed study of these roads was performed and is included in **Appendix Z**. It has been decided that portions of the steeper grades along Taylor Ridge Road will be paved in order to maintain the roadway surface for travel by school buses during snow and ice conditions that may occur at certain times of the year. The improvements to Taylor Ridge Road will be made by Greene County, using funding provided by INDOT.

Comments were received from individuals about the closing of Carter Road (CR 100N/CR 150N) at the Greene/Monroe County line. These comments stated that the closing of this road would require use of the bridge on CR 100N/CR 150N over Indian Creek by heavy vehicles and farm equipment. An inspection of this bridge has since been performed and the previous vehicle weight restriction on the bridge has been removed by Greene County. The width of this bridge does not pose any additional or unusual restrictions for use by farm vehicles that would not otherwise be found on typical bridges in Greene County.

Glenview Drive in Rolling Glen Estates was proposed to be closed at Wheaton Court in the DEIS. Comments from representatives of local government and individuals were expressed about this road closing and the loss of a second access to the subdivision. Additional evaluation has been performed and Glenview Drive will be extended and reconnected to Bolin Lane.

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The construction of the SR 37 interchange will require the closing of That Road at SR 37. As presented in the DEIS, a frontage road will be constructed to connect That Road to Rockport Road on the east side of SR 37. Comments were received from representatives of local government, public organizations and individuals about this improvement during the interim time between the construction of I-69 Section 4 and the complete construction of the frontage road on the east side of SR 37 that would not occur until construction of I-69 Section 5.⁶ Concerns included increased local travel and affects upon school bus routes during the interim time period. Further review of the SR 37 interchange has recommended that an interim signalized “T” intersection be constructed at the junction of I-69 and SR 37. The interim intersection will enable That Road to remain open on both sides of SR 37 until such time as the full SR 37 interchange and Section 5 improvements are constructed (see Section 5.6.3.2 and **Appendix QQ**, *SR 37 Operational and Safety Analysis*).

11.2.2.11 Neighborhood and Socio-Economic Impacts

Many comments were received from individuals about the project effects upon neighborhoods and other potential socio-economic impacts. The prominent comments about potential impacts upon residential properties and other community-type impacts are provided in the following five categories.

Rolling Glen Estates and Residential Areas

The most comments about potential project affects upon residential properties were received from property owners in Rolling Glen Estates. Comments were also received from residential property owners in the Victor Heights, Farmers Field Acres, and Shea Estates subdivisions and other individual residential properties located along the highway. The noted subdivisions are shown on map pages 2 and 3 of **Figure 5.2-2**. Potential noise impacts were the most common concern expressed by these property owners. Other prominent concerns included changes in property values, crime/neighborhood safety, visual impacts, drainage/flooding concerns, and ambient light impacts. Access was also a primary concern of residents in Rolling Glen Estates. Some commentators requested consideration to adjust the alignment further west from Rolling Glen Estates in order to reduce these impacts upon the subdivision.

There is no evidence that crime will be impacted either positively or negatively by the presence of a new highway between Indianapolis and Evansville. INDOT has been coordinating with law enforcement and emergency response personnel throughout this project. With regards to visual impacts, INDOT will consider incorporating vegetative screening along I-69 in the vicinity of the Rolling Glen subdivision as visual screening. With regards to ambient light concerns, the final determination of lighting is not made until the design phase of the project. Lighting may be provided at interchanges; however, lighting along the highway mainline is not expected. With regards to drainage and flooding concerns, proper drainage control is one of the essential

⁶ Portions of the frontage road to connect with That Rd. on the east side of I-69 are parts of both the Section 4 and Section 5 projects.



elements of highway construction and generally the goal in highway drainage design is to perpetuate natural drainage as practical. The design of all drainage elements will adhere to the Indiana Design Manual and will consider the effect of the proposed improvements on neighboring properties. Comments about noise and access for Rolling Glen Estates are discussed in Section 11.2.2.5 and Section 11.2.2.10, respectively. Potential affects upon property values are discussed below.

With regards to a possible alignment shift in Subsection H adjacent to Rolling Glen Estates, three alignments were studied in this area in the DEIS and were evaluated based on the number and severity of the impacts to environmental resources, engineering design considerations, and cost. The alignment selected for Refined Preferred Alternative 2 is based upon these criteria. Selecting another alignment would result in greater overall impacts to environmental resources, more right-of-way acquisition and a higher cost. It was determined that the preferred alignment has virtually no flexibility for even a minor shift due to the need to avoid impacts to sensitive karst features near Rolling Glen Estates.

Property Acquisition

Various comments were received from property owners about property acquisition. These included perceived changes in property values, questions about the status of possible acquisition of specific properties, landlocked parcels, and the overall land acquisition process.

At this time, only property that is directly affected by the construction of I-69 is anticipated to be purchased. Property acquisition will occur as part of final design. If during that time, INDOT determines that the remaining property will have little or no values or use to the owner, INDOT will consider this remainder to be an uneconomic remnant and will offer to purchase it. The owner will have the option of accepting the offer for purchase of the uneconomic remnant or keeping the property. Many right-of-way acquisition inquiries have been made informally at the Section 4 Project Office. Most commonly, local residents have visited the office in order to determine whether or how much of their property would be acquired and inquired about how soon the right-of-way acquisition would begin. Residents whose properties would be affected by right-of-way acquisition were offered pamphlets about the process.

Relocation resources and relocation assistance advisory services are available to all residential or nonresidential displacements in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 49 CFR (Code of Federal Regulations) 24. Just Compensation is required for persons whose property is acquired for public use. Just Compensation may not be less than the amount established in an approved appraisal report as the fair market value of the property. No person displaced by this project will be required to move from a displaced dwelling unless comparable replacement housing is available to that person. INDOT will take required actions to ensure fair and equitable treatment of persons displaced as a result of this project up to and including providing replacement housing of last resort as defined in 49 CFR 24.404. All impacts which are addressed in INDOT's relocation policy will be compensated as that policy provides. However, INDOT's relocation policies, as well as applicable Federal law, do not recognize claims for changes in property values.



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School Bus Routes

INDOT has had coordination with all local public school corporations about the proposed improvements and roads that may be closed or relocated. Many public comments were received about potential road closings and the affects upon school bus routes or access to properties by school buses. With the decisions provide grade separations at I-69 for Dry Branch Road, Mineral-Koleen Road, Burch Road, Harmony Road and Bolin Lane, most concerns about impacts upon school bus routes have been resolved (see Section 11.2.2.10).

Concern about school bus travel along Taylor Ridge Road in Greene County has been addressed and mitigation measures will be provided (see Section 11.2.2.10 and **Appendix Z**, *Documentation of Local Access Decisions*). Concern about school bus travel along That Road has also been addressed (see Section 11.2.2.10 and **Appendix QQ**, *SR 37 Operational and Safety Analysis*).

Bicycling and Alternative Transportation

Comments about bicycling and alternative transportation (non-motorized) were received from representatives of local governments, a public organization, and many individuals. Most of these comments were about the possible closing of Burch Road, Harmony Road and Bolin Lane in Monroe County. With the decision to maintain travel along these roads, the use of these roads by bicyclists will be unaffected by the project.

Coordination with local government representatives in Monroe County has included consideration of the recommendations of the *Monroe County Alternative Transportation & Greenway System Plan*. It has been decided that additional shoulder width will be provided along Breeden Road, Harmony Road, Rockport Road, Tramway Road and Bolin Lane in order to accommodate a shared bicycle lane/shoulder as recommended in the alternative transportation plan. The development of the bicycle lane will be implemented at a future time by Monroe County (see **Appendix Z**). An I-69 greenway, as included in the alternative transportation plan, will not be implemented along Section 4 but will continue to be analyzed by INDOT for other sections of I-69 located to the north of Section 4.

Emergency Response Services

INDOT has had multiple meetings with all local agencies that provide police, fire, emergency medical services, hazardous material response services, and ambulance services within the Section 4 study area. With the decision to maintain travel along Dry Branch Road, Mineral-Koleen Road, Burch Road, Harmony Road and Bolin Lane along with the review of all other local roads that will either be closed or relocated, no significant concerns about emergency services are unaddressed or unresolved.

The only remaining emergency service issue that will require additional consideration is the suggested development of an emergency access ramp to I-69 in Monroe County. This issue has been commented upon by several representatives of local government. Studies have been undertaken to develop a potential emergency ramp at Burch Road. A final decision will be made during the project design phase. Local comments about this emergency ramp, the evaluations



that have been performed to date, and an outline of future consideration of this potential emergency access ramp is included in **Appendix BB**, *Emergency Responder Coordination*.

11.2.2.12 Funding Cost

Several representatives of local government, public organization and individuals indicated concerns about the cost estimates including increases in project costs from the Tier 1 study and maintenance costs. Some commentators stated that INDOT does not have sufficient funding to complete the project and expressed concern about the funding source and INDOT priorities.

Regarding project cost estimates, the DEIS cost estimates were completed in accordance with the cost estimating methodology presented in **Appendix D**, *Cost Estimation Methodology*. Since the DEIS, the cost estimating methodology has been modified because of recent decreases in construction costs that have been experienced on recent INDOT comparable construction projects. Other modifications to the cost estimates have been made for changes to the initial design criteria and low-cost design criteria for Refined Preferred Alternative 2. Maintenance costs are discussed in Section 3.4.3.2. Section 6.4.2 of the FEIS compares Tier 1 to Tier 2 costs and impacts. Section 4 costs are within inflation-adjusted Tier 1 costs for the initial design guidelines; they are well under Tier 1 inflation-adjusted costs for the low-cost design guidelines.

With regards to the project funding, INDOT will fund the Section 4 project with traditional transportation funding, using both federal and state funds. FHWA's requirements for a Project Management Plan (for projects costing more than \$500 million) apply to the Section 4 project. INDOT will satisfy the FHWA requirements, as described in the FHWA Administrator's memorandum of January 19, 2007. It states that "A draft Project Management Plan should be submitted to FHWA by the recipient of federal financial assistance prior to the ROD, FONSI or CE determination. A final Project Management Plan should be submitted to FHWA within 90 days after the ROD, FONSI or CE determination."

The current INDOT Long Range Plan provides for significant expenditures to preserve the existing highway network. In Indiana's 2010-2035 Draft Long-Range Transportation Plan (<http://www.in.gov/indot/div/2035LongRangePlan.htm>), the commitment to preservation will continue. Figure 24 (page 66) of the draft plan indicates that about 53% of the long-range revenue forecast will be distributed to the preservation component of the 2021-2035 construction program. During this same time period, it is forecasted that about 47% of the long-range revenue will be distributed to the expansion component of the construction program. INDOT is committed to maintaining its existing transportation system, as well as providing for the needs of a growing population and economy.

11.2.2.13 Greene County/Monroe County Line Interchange

Several comments were received from federal and state agencies, representatives of local governments, public groups and individuals about the Greene County/Monroe County Line interchange. The comments included requests for additional clarification about the Tier 1 recommendations for Section 4 intermediate interchanges, the need for adding the Greene County/Monroe County Line interchange, the reasons for selecting Interchange Option 1 (which

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includes the Greene County/Monroe County Line interchange), the selection of the South Connector Road, and potential induced growth impacts associated with the Greene County/Monroe County Line interchange.

The Tier 1 EIS identified a maximum of two intermediate interchanges in Section 4 between US 231 and SR 37 (see discussion of interchange options in Chapter 3.2.2.3). This decision was based upon, in part, the presence of sensitive resources (such as karst) and the desire to minimize potential indirect impacts in those areas. As stated on page 14 of the Tier 1 Biological Assessment (February 38, 2006), the Greene County/Monroe County Line interchange would not be an additional interchange but rather would replace one of the Tier 1 identified interchanges. For Refined Preferred Alternative 2, Interchange Option 1 includes an interchange at Greene County/Monroe County line which replaces the potential interchange at SR 54 that was identified in the Tier 1 study. Both the Greene County/Monroe County Line interchange and a potential SR 54 interchange are located in a karst region. As indicated in the Tier 1 ROD, potential interchange locations were shown in the Tier 1 FEIS (Vol. III, Environmental Atlas) solely for the purpose of estimating potential impacts, benefits, and costs (Tier 1 ROD, p. 6). In addition to the Section 4 termini interchanges at US 231 and SR 37, the Tier 1 study identified potential intermediate interchanges at SR 45 and SR 54. As indicated in the Tier 1 ROD, decisions regarding the number and location of interchanges will be made in Tier 2 (Tier 1 ROD, p. 6). Also, as stated in the Section 4 DEIS, “during Tier 2, some interchange locations could be discarded and new locations could be added” (p. 5-5).

While the FWS preference is that there would be no interchanges developed within the karst area,⁷ the project purposes are much better satisfied with one interchange in a karst area. Following the completion of the original Tier 1 BO (December, 2003), analysis of the Tier 2 alternatives and significant community and local government input identified that an interchange located north of SR 54 near the Greene/Monroe County Line would provide significant transportation benefits. These benefits would especially be realized by those presently traveling between the Bloomfield area and Bloomington. This traffic would not use an interchange at SR 54, but would continue to use SR 45 for travel to and from Bloomington. In addition to the traffic benefits, the diversion of these trips to I-69 eliminates the need to add capacity (travel lanes) on existing SR 45 from Curry Pike southwest to near the Greene County Line.

Interchange Option 1 is the recommended combination of interchanges for Refined Preferred Alternative 2. This interchange option includes intermediate interchanges at SR 45 and the Greene County/Monroe County line interchange. It has been selected because it performs significantly better in fulfilling the project purposes. Specifically:

- It provides the greatest congestion relief in the five-county Study Area, especially along SR 45;
- It serves the greatest traffic volume;

⁷ See US Dept. of Interior comment letter on Section 4 DEIS, September 15, 2010. This letter is comment AF001 in Volume III.



- The SR 45 interchange provides regional access for southeast Greene County and a direct I-69 connection to Crane NSWC. It also provides congestion relief on SR 45 between US 231 and SR 54; and
- The Greene/Monroe County Line interchange has nearly double the overall interchange demand volume of SR 45 and provides increased accessibility to Eastern Greene County and Bloomfield area residences. It has considerable local government and public support and provides accessibility for emergencies along I-69 and in Eastern Greene County and Western Monroe County and reduced traffic volumes and congestion relief on SR 45 from SR 445 into Bloomington.

Substantial coordination with Federal and state resource agencies was undertaken regarding the Greene County/Monroe County line interchange throughout the Tier 2 Section 4 project. At two major project coordination milestones – the Purpose and Need/Preliminary Alternatives meeting/webcast held on December 19, 2005 and the Alternatives Screening meeting held on August 31, 2006 – the potential interchange was discussed with Federal and state resource agencies, which provided comments on the interchange. As the coordination summaries note (see Sections 3.2.2, 11.2.3, and 11.4.2), there are concerns about potential impacts associated with this interchange. However, agencies which expressed these concerns with the potential Greene County/Monroe County Line interchange did not characterize their issues as insurmountable. In addition, because of continued concerns about possible indirect development in karst areas, INDOT and FHWA made a commitment not to build an interchange at SR 54 if the county line interchange is built. (Revised Programmatic Biological Opinion, FWS, August 24, 2006, p. 29).

The South Connector Road generally has higher impacts and costs than the North Connector Road, since it is longer. These higher costs and impacts were considered along with traffic performance and safety for the North and South Connector Road options. The South Connector Road was included in the Preferred Alternative because it had the best transportation performance and traffic reductions on SR 45 between SR 445 and SR 37, provides a direct connection for travel between Eastern Greene County/Bloomfield and the Bloomington urbanized area, and replaces an unconventional and confusing intersection (SR 45/SR 445) with a safer conventional four-leg intersection.

Following the completion of the original Tier 1 BO (December, 2003), analysis of the Tier 2 alternatives and significant community and local government input identified that an interchange located north of SR 54 near the Greene/Monroe County Line would provide significant transportation benefits. These benefits would especially be realized by those presently traveling on existing SR 54 and SR 45 between the Bloomfield area and Bloomington. With the Tier 1 potential interchanges, this traffic would not use the SR 54 interchange, but would continue to use SR 45 to and from Bloomington. In addition to the traffic benefits, the diversion of these trips to I-69 would eliminate the need to add capacity (travel lanes) on existing SR 45 from Curry Pike southwest to near the Greene County Line. The current INDOT Long Range Transportation Plan (2007) recognized this, and eliminated this added capacity improvement which was included in previous plans. The elimination of the added travel lanes on SR 45 also avoids encouraging development in environmentally-sensitive areas near Bloomington, such as the Garrison Chapel Valley. The significant reduction in traffic on this segment of SR 45 will

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also probably result in less development of businesses dependent upon drive-by traffic (such as fast food restaurants, service stations, etc.). This County Line Interchange does not offer direct access from within Monroe County by extending the ramps/connector road to SR 45 near Cincinnati (thus avoiding Monroe County), and making the access road fully access-controlled. Making the access road fully access-controlled prohibits direct access to commercial and residential development along the access road, which will discourage development in this area.

The County Line Interchange was designed to prevent direct access from within Monroe County by extending the ramps/connector road to SR 45 near Cincinnati, and making the access road fully access-controlled to limit indirect development in this area. Making the access road fully access-controlled prohibits direct access along this access road, effectively forestalling commercial and residential development. In addition, this interchange location was considered to be a replacement of a previously identified Tier 1 interchange location to assure that there would not be additional interchanges in the karst area (see Tier 1 Biological Assessment Addendum, February 28, 2006, p. 14).

No additional interchanges are proposed in karst areas; this is one reason for not carrying forward for detailed any alternatives which included both the SR 54 and County Line interchanges. Including the County Line Interchange does not result in increased development, only a potential relocation of induced growth. See **Appendix JJ1** (*Redacted Section 4 Tier 2 Biological Assessment*, Appendix E) for more discussion.

11.2.2.14 Karst Resources

The DOI commented that the DEIS Preferred Alternative for Section 4 demonstrates a reasonable effort to avoid impacts to natural resources, including minimizing habitat fragmentation and impacts to karst features.

The USEPA's DEIS comments pertaining to karst resources generally related to the analysis of karst impacts for alternatives, potential impacts to unknown subsurface karst features, potential impacts on drinking water quantity and quality, flow conditions as they relate to pollutant loading, karst fauna study methodology, construction blasting and the identification of mitigation measures for Karst Areas.

USEPA expressed concern that the lack of subsurface karst feature data poses a threat to karst environments during construction of the proposed highway facility and noted the importance of identifying subsurface karst features early in the design phase. As explained in Section 5.21.1, the project is being developed in accordance with the Karst MOU, which provides seventeen procedural steps/guidelines for development of highway projects in karst terrain. Procedural steps 1 through 4 are completed during the NEPA phase of project development. These steps pertain to identification and documentation of observable karst features, identifying underground flowpaths associated with observable features (through methods such as dye tracing, coordination with signatory agencies and development of potential mitigation measures to be implemented). Geotechnical work completed prior to construction may provide some additional information about previously unknown subsurface karst features. Such features will be appropriately addressed in the design phase of the project. Additional subsurface karst features



may be identified during construction. The MOU contains a procedural step (Step 14) to account for encountering previously unidentified features during construction.

USEPA expressed concern that the project could result in changes in drainage patterns to and from karst features, resulting in a reduction in water available to landowners who rely on these water supply features for residential or agricultural uses. USEPA regards stormwater runoff as a threat to groundwater quality and that induced development can also impact groundwater quality through the addition of septic systems and impervious surfaces within karst zones of susceptibility. As noted earlier, the project will be developed in accordance with the Karst MOU. Appropriate BMPs will be utilized throughout the project to avoid and minimize impacts to karst features and water quality. A list of potential BMPs for use in karst areas is presented as **Table 5.21-2a**. As explained in Section 5.21.3.9, areas where induced growth is predicted to occur are served by water utilities.

USEPA commented that a cave fauna survey of all accessible caves within, or directly adjacent to, the Section 4 corridor would better characterize cave fauna and further demonstrate a commitment to "meet Indiana's transportation needs in an environmentally sensitive manner that protects the habitat of all species," as outlined in the 1993 Karst MOU. USEPA suggested that cave fauna surveys be conducted for caves within areas where induced growth is predicted. As explained in Section 5.21.3.7 caves surveyed for biota were selected based on potential impacts to features hydrologically connected to the corridor. The exact location of indirect development with relation to specific karst features cannot be determined, and cave fauna surveys in areas of induced growth would not inform an alternative selection, as predicted induced growth is the same for all alternatives.

USEPA commented that the pollutant loading analysis presented in the DEIS appeared biased in its assumptions of the quantity of water involved in pollutant mobilization. USEPA recommended the FEIS include analyses of typical and extreme rain events, mobilizing the same pollutant load. Pollutant loading estimates have been updated since publication of the DEIS and are included in *Final Karst Report/Addendum to Karst Report (Redacted)* in **Appendix AA**. The estimates provided are based on a 'typical' rain event. The 2-year/24-hour and 1-year/1-hour rain events are believed to be representative of 'typical' rain events in the analysis. According to the Indiana Design Manual, storm sewer pipes on Interstates are to be designed for a 50-year rain event with a 5- or 10-minute duration. Therefore, the 50-year rain event has been added to the analysis as an 'extreme' event.

USEPA commented that blasting can cause structural damage to buildings and wells, and cause the collapse of karst subsurface openings, such as cave walls. It noted that the DEIS does not identify the specific measures that will be taken to insure that the integrity of structures and wells, as well as that karst subsurface openings remain intact. Commitments are contained in FEIS Section 7.3.3 pertaining to blasting in areas within 0.5 mile of known Indiana bat hibernacula. All blasting in the Winter Action Area (WAA) will follow the specifications developed in consultation with the USFWS and will be conducted in a manner that will attempt to avoid compromising the structural integrity or alter the karst hydrology of nearby caves serving as Indiana bat hibernacula. This same commitment will help in minimizing impacts to water wells and other wildlife. The INDOT Standard Specification 203.15 Excavating Rock will



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be followed. INDOT Standard Specifications require specific pre- and post-construction documentation and blasting controls to assure no property damage occurs outside of the INDOT right-of-way as a result of highway blasting. Blasting operations on property adjacent to the right-of-way will be coordinated directly with the owners/operators as a part of the right-of-way acquisition process to address any issues associated with blast zones.

The USEPA commented that one of the most important mitigation BMPs is the nature of drainage ditch lining where ditches intercept karst conduits. These linings prevent water conveyed in ditches from entering the karst system. USEPA noted that the identification and estimates of the types of BMPs to be provided need to be specified so that contractors can prepare responsive bids. The USEPA recommended the FEIS explain INDOT's proposed project development and contracting process for Section 4. In accordance with the Karst MOU, the mitigation measures and BMPs to be implemented will be agreed upon by signatory agencies in post-NEPA phases of project development. A table has been added to FEIS Section 5.21 (**Table 5.21-2a**) and Chapter 7 (**Table 7-1a**), listing potential BMPs and mitigation measures. The project development and contracting process for Section 4 has not yet been determined. If the Design/Build (D/B) project delivery is chosen, appropriate conditions will be incorporated into the contract for treatment of karst features in accordance with the Karst MOU.

In response to the USEPA comments a firm commitment has been added to Section 7.3.4, that if active groundwater flow paths are discovered, measures will be taken to perpetuate the flow and protect water quality.

USEPA also suggested clarification in the FEIS that USEPA Class V injection well permits may be required for various types of projects. The requested clarification regarding Class V injection well permits was included in FEIS Section 5.19.2.4, 5.21.4, and 7.3.4.

Public comments were received suggesting that impacts to karst resources could be reduced significantly if the highway alignment were shifted easterly, significantly outside the Section 4 corridor, in the area approximately between Carmichael Road and Lodge Road. Commenters provided two separate but similar recommended alignments. It was determined that the Tier 2 analysis has not identified any unexpected resources or impacts in the portions of the project which these alternatives would bypass. Also, the resources and impacts in the corridor are in no respect significantly or materially different than what was known when the Tier 1 corridor was approved. Because neither suggested alignment meets the standard established in the Tier 1 ROD to consider alignments outside the approved corridor (“to avoid significant impacts within the selected corridor”)⁸, no further analysis of these proposed alignments is warranted. Refer to response to Comment PI322-01 in Volume III of this FEIS for further information.

11.2.2.15 SR 37 Traffic

Comments were received from representatives of local government, public organizations, and individuals about the overall capacity of SR 37 and about various existing intersections along SR

⁸ See Tier 1 ROD, Section 2.3.5.



37 in the Bloomington area. The comments about intersections were about potential capacity and safety concerns at existing SR 37 intersections located south of the proposed I-69/SR 37 interchange and similar concerns for other existing SR 37 intersections to the north of this interchange and which are located within the I-69 Section 5 study area. All of these comments about SR 37 were with regard to the interim time following completion of the Section 4 improvements and prior to the construction of Section 5 of the I-69 Evansville to Indianapolis project.

With regards to the general capacity of SR 37, Section 5.6.3.3 includes discussion about additional traffic modeling that was performed to evaluate the potential effects that traffic from I-69 Sections 1 through 4 may have on existing SR 37 in and around Bloomington prior to the construction of I-69 Section 5. Although traffic volumes would increase on SR 37 in the Bloomington area, the existing roadway has additional capacity and is projected to continue to operate at acceptable and even high levels of service. As discussed in **Appendix QQ**, *SR 37 Operational and Safety Analysis*, a few potentially significant traffic issues occur on the existing SR 37 infrastructure prior to the completion of Section 5; **Appendix QQ** also outlines potential steps which INDOT can take to address these issues.

With regards to existing intersections along SR 37, a traffic operations and safety assessment of 12 intersections along SR 37 has been prepared and is included a **Appendix QQ** of the FEIS. This study identifies potential improvements at these intersections that will be further reviewed by INDOT and, if implemented, would be performed as improvements independent of the I-69 Section 4 project. The study includes an assessment of the SR 37/That Road intersection (see Section 11.2.2.10). Coordination with representatives of the local governments will continue regarding these SR 37 intersections.

11.2.2.16 Construction, Mitigation and Permitting

USEPA suggested FEIS text revisions to clarify the discussion of USEPA Underground Injection Control and Class V Permits under the Safe Drinking Water Act. These revisions were made in FEIS Section 5.19.2.4.

USEPA suggested a clarification that the USEPA reviews jurisdictional determinations made by the USACE under the Clean Water Act. This revision was made to FEIS Section 5.19.2.3.

USEPA recommended that if active groundwater flow paths are discovered during construction, measures should be taken to perpetuate flow and protect water quality. A commitment in this regard was added to FEIS Section 7.3.17.

In response to the USEPA's October, 2010 comments on the DEIS, a firm commitment has been made in Section 7.3.9 of the FEIS that wetlands and other water resources will be actively avoided throughout the final design of the Section 4 roadway. All avoided water resource areas within the right-of-way will be identified on the design plans and these areas will have erosion control measures as approved by IDEM as part of the overall erosion control plan for the roadway project to prevent any filling or contamination of these areas during construction of the Section 4 project.

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In response to the USEPA's October, 2010 comments on the DEIS, clarification was provided in Section 7.3.16 of the FEIS that although it is not anticipated that any floodplains in Section 4 will be bridged in their entirety, the majority of floodplains will be bridged, thus minimizing impacts. Final design for all bridges will ensure that adequate floodplain bridging is incorporated to satisfy IDNR hydraulic requirements for construction in a floodway permitting.

In response to the IDNR's October, 2010 comments on the DEIS, Section 5.19.2.4 was updated to provide discussion of commitments relating to the placement of riprap, the use of alternative armoring materials, the use of deer exclusion fencing and the use of bio-engineering techniques. Additional commitments listed in Section 5.19.2.4 relate to the installation of riprap being limited to areas necessary to protect the integrity of structures being installed.

Per IDEM comments, Chapter 5.19.2.4 was revised to include a firm commitment to evaluate measures for bank stabilization, reinforcement and erosion control for final design of the South Connector Road bridge over Indian Creek to minimize natural channel migration.

11.2.2.17 Design Criteria

Comments were received from public organizations and individuals about the design criteria that will be used for Section 4. Most of these comments questioned the use of the low-cost design criteria and concerns that such design will make the road less safe. Other comments were received about changes in pavement material that may result in increased long term costs.

As outlined in the DEIS, INDOT is considering a range of design criteria for I-69, Section 4. Detailed information about the low-cost design criteria is included in **Appendix GG, Low-Cost Design Memorandum**. These criteria satisfy INDOT's Design Manual and there is no evidence that the road will be less safe. The decision regarding which criteria will be used for I-69 will be finalized during design.

With regards to the pavement material, pavement design is finalized during the design stage. Choices such as pavement thickness and types are made in consideration of forecasted traffic levels, current material costs, as well as life-cycle maintenance costs for different pavement types. By considering a range of pavement materials in preparing cost estimates for this project, INDOT is reflecting its current practices, which seek to provide a safe facility at the lowest overall cost to Indiana's taxpayers.

11.2.2.18 Tier 1 Issues

Many comments about the Tier 1 study were received from individuals during the Section 4 DEIS review and comment phase. Most of these were about the I-69 route that was selected during the Tier 1 study, support for an alternative Tier 1 route for I-69, and potential impacts upon social, economic, and/or environmental resources located outside of the Section 4 study area. The Tier 1 ROD selected Alternative 3C corridor as the build alternative for I-69 between Evansville and Indianapolis. Comments that deal with Tier 1 issues, such as alternative routes/corridors or the build/no build decision, require no further response in this Tier 2 document. Copies of letters, petitions, and other various comments which were provided during



and before the Tier 1 studies (prior to the Tier 1 ROD) were submitted at the Section 4 public hearing. Since these comments were submitted during earlier studies and were considered at that time, no further responses are provided. These documents are included in Volume III, Part C of this FEIS.

Of the 786 comments that were received from individuals during the Section 4 DEIS review and comment phase, 333 commentators only included comments about these types of Tier 1 issues. Many other comments from public organizations and individuals also included some comments about Tier 1 issues.

In addition to these comments, form letters that were developed by a local organization in a standardized format were received from 437 individuals. The form letters included six comment boxes on specific Section 4 issues that could be checked (marked) by the responder and also included space to provide additional comments about the project. Additional comments were received from 317 individuals. The majority of the additional comments were about the Tier 1 issues noted above.

General public comments were received advocating the use of rail and public transportation to improve air quality, as well as change levels of carbon emissions. Rail was suggested as an alternative to highways because it would help to improve air quality as well as reduce congestion by moving the transport of goods and materials from trucks to trains. Public mass transportation was suggested instead of constructing I-69.

From a policy standpoint, FHWA's current approach on the issue of carbon emissions is as follows: To date, no national standards have been established regarding greenhouse gases, nor has the USEPA established criteria or thresholds for greenhouse gas emissions. FHWA does not believe it is informative at this point to consider greenhouse gas emissions in an EIS. FHWA is actively engaged in many activities with the DOT Center for Climate Change to develop strategies to reduce transportation's contribution to greenhouse gasses in particular CO₂ emissions, and to assess the risks to transportation systems and services from climate change. FHWA will continue to pursue these efforts as productive steps to address this important issue. FHWA will review and update its approach to climate change at both the project and policy level as more information emerges and as policies and legal requirements evolve.

The I-69 project does not exclude mass transit options and projects in Southwest Indiana. Two of the core goals of the Tier 1 analysis were to consider alternatives which maximize the movement of freight, and to consider alternatives which maximize accessibility to intermodal freight centers, including important rail intermodal centers in Evansville and Indianapolis.

11.2.2.19 Additional Agency Input

On February 21, 2011, a draft of the Comments and Responses (C/R) document⁹ was submitted for review and consideration to the following federal and state agencies: USEPA, FWS, Natural

⁹ Agencies were provided with draft responses to all comments received on the DEIS, including those provided by state and federal agencies, local governments, public organizations and private individuals.

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Resources Conservation Service (NRCS), NPS, USACE, IDEM and IDNR. Comments were received from USEPA, IDEM, and IDNR. The IDNR-Division of Historic Preservation and Archaeology (SHPO) also responded indicating they had no comments.

A summary of the three agency comments are provided below. Volume III, Part A of this FEIS contains the original agency comments on the DEIS, as well as responses to these comments. The three agency letters, and the e-mail from IDNR which commented on the draft responses to comments are included in Volume III, Part B. The draft responses to comments were modified to address the agency comments in these letters and e-mail. Responses which were thus modified are designated in Volume III, Part A.

A summary of the comments on the draft C/R document received from USEPA (3-8-11) and modifications made to the draft responses to comments are as follows:

- Concerns were indicated from USEPA about the potential for direct and indirect adverse impacts to surface and groundwater quality and quantity in relation to streams/ponds/wetlands, drinking water supplies (wells and springs) and associated public health risks, particularly in karst areas and other challenging environments. All relevant measures to protect these resources should be incorporated into the project's final design, construction and operation. **Table 5.21-2a** and **Table 7-1a** were added to the FEIS. These tables list BMP's and possible design elements for water resource mitigation in karst areas. Detailed mitigation measures will be developed during final design in accordance with the Karst MOU.
- Stream impacts are considered the major aquatic issue by USEPA and it regards mitigation for these impacts as a significant issue. FEIS Chapter 5.19.2.4 and Chapter 7 were updated in the FEIS to discuss additional stream mitigation. Various stream mitigation efforts will be used.
- USEPA noted that the air quality conformity determination for Greene County needs to be completed. The FEIS includes documentation of the conformity demonstration. The emissions analysis report is included in FEIS **Appendix MM**, *Greene County Air Conformity*, and its findings are discussed in Section 5.9.7.
- USEPA recommended that Class V permits under the Safe Drinking Water Act be incorporated into the FEIS. This information has been incorporated into Chapters 5.21.4, 5.23.8, 7.3.4, and 7.3.17 of the FEIS.
- To further expound upon their stream impact concerns, USEPA indicated that specific locations and structures to reduce stream impacts at specific stream reaches need to be clearly depicted in the FEIS. Tables of preliminary recommended structure types are included in **Appendix M**, *Final Stream Assessment Report*, of the FEIS and have been added to Chapter 5.19.
- USEPA indicated that the Greene County/Monroe County Line interchange represented an "additional interchange" beyond those proposed in the Tier 1 study. This FEIS clarifies that the Greene County/Monroe County Line interchange was added during the Tier 2 Section 4 study for consideration along with potential intermediate interchanges at SR 45 and SR 54.



However, no interchange was “added”, in that the County Line Interchange replaced the SR54 interchange proposed in Tier 1 (see Chapters 3.2.2.3 and 3.4.2).

- USEPA indicated concerns about the potential for indirect impacts from the development that the Greene County/Monroe County Line interchange will accommodate and promote in the sparsely developed rural area of eastern Greene County and nearby areas of western Monroe and likely northwest Lawrence Counties. Three new figures have been included in the FEIS Chapter 5.24, *Indirect and Cumulative Impacts*, to better spatially identify those areas where surface and groundwater resources are particularly vulnerable in relation to TAZ areas with anticipated induced growth from Section 4. These include **Figure 5.24-4** which shows soil septic absorption suitability in the project vicinity, **Figure 5.24-5** which shows significant environmentally sensitive features and karst feature densities, and **Figure 5.24-6** which shows the existing sanitary sewers in the project vicinity. FEIS Chapter 5.24 also has been updated with a narrative discussion of local land use planning tools and regulations stemming from the I-69 Planning Grant Program.
- USEPA recommended that consideration be made for any established or recommended local land use tools, or state/county public health tools that address residential and commercial development and long-term, effective on-site wastewater treatment. The FEIS notes local septic system design review and approval processes currently in place in Greene and Monroe Counties and that these processes are anticipated to lessen somewhat the negative effects of induced growth upon drinking water supplies. Established local land use tools regulating the design, construction, installation, location, maintenance and operation of on-site wastewater treatment systems are identified in the FEIS.
- USEPA recommended that information on stream structural quality be included in the FEIS. This information has been incorporated into Chapter 5.19. USEPA also recommended that clarification as to whether most or all of the perennial riffle pool streams will be bridged. This has also been addressed in Chapter 5.19 of the FEIS. All perennial streams crossed by the preferred alternative will be bridged. If streambank stabilization is required at the perennial stream crossings, natural stream bank stabilization will be used.
- It was recommended by USEPA that the stream crossings be identified that may require stability measures for the bridging and which may result in dredge or filling the riffle pool stream and its banks. Chapter 5.19.2 of the FEIS has been revised to identify riffle-pool stream crossings that may require stability measures.
- USEPA recommended that the FEIS identify the specific construction BMPs that could be used to successfully protect surface and groundwater quality. The FEIS notes that all water resource areas within the right-of-way shall be clearly identified on the Erosion Control Plans along with the specific measures that are identified and approved for that area to prevent accidental fill and contamination of these areas during construction. INDOT will be working closely with IDEM to develop unique measures to include in the Erosion Control Plans for Section 4 construction to prevent impacts to water resources within the right-of-way but outside the construction limits.
- USEPA recommended that the progress on compensatory mitigation work since the Tier 1 ROD be updated in the FEIS. The FEIS indicates that stream impacts will be calculated on a linear foot basis and mitigation will be completed to adequately mitigate for linear feet of



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stream impacts in coordination with both the USACE and IDEM during the permitting process. Additional information on mitigation concepts is included in the Biological Assessment (BA) which is included as **Appendix JJ1, Redacted Section 4 Tier 2 Biological Assessment**, in the FEIS. The Tier 2 Section 4 BA includes mitigation information for Section 4.

- USEPA suggested that mixed-use mitigation objectives be more clearly described, including which values may prevail over others in the site selection process. The FEIS indicates that stream mitigation will be completed in coordination with the USACE (and indirectly with USEPA via coordination with the USACE) and IDEM during the 404 and 401 permitting process. As planned, many of the mitigation sites have multiple mitigation efforts being completed on them which include stream mitigation, wetland mitigation, and upland forest mitigation.
- Concerns were expressed by USEPA that the appropriate level of consideration was not given to the various karst feature types presented in the DEIS and that the alternatives analysis appears to have considered impacts to the seventeen different karst feature types as equals. It suggested that consideration be given to karst feature size, location, infiltration rate, recharge/discharge characteristics, connectivity to groundwater conveyances, potential T&E species impacts, potential water quality impacts, and threats to the traveling public. The FEIS analyzes total karst feature impacts by alternative. It also considers “areas of importance”, and also qualitatively compares impacts by alternative, by infiltration/discharge rate within hydrologic units. The analysis did not treat all features equally.
- USEPA indicated that the proposed action could potentially result in changes in drainage patterns to and from karst features if construction were to eliminate recharge features, sever conduits, and reduce flows. It feels that this could result in a reduction in water availability for landowners who rely on such water supply features for residential or agricultural uses. INDOT will follow the steps established in the Karst MOU. Appropriate BMPs will be utilized throughout the project to avoid and minimize impacts to karst features and water quality. A list of potential BMPs being considered is provided in FEIS **Table 5.21-2a**.
- USEPA suggested that additional cave fauna studies would assist in providing a better understanding of all potential direct and indirect/secondary impacts associated with construction of the proposed action, while also helping with the selection and refinement of mitigation measures and best management practices for protecting the biological integrity of karst resources. As stated in the FEIS, six caves or springs were surveyed. Selection of the sites was based on the results of the karst studies which identified hydrologic connections between the six sites and the Section 4 preferred alternative or corridor. Survey sites were selected based on potential impacts to such hydrologically connected features. It is noted that INDOT does not have the authority to conduct the surveys which would be needed to identify such karst features. The karst features within the project corridor were identified by “on the ground” surveys, which INDOT has the authority to conduct within areas which the project might directly impact. INDOT does not have the authority under state law to conduct such surveys in the much wider area outside the corridor which would not be directly impacted by the project.



- It was recommended by USEPA that the pollution loading analysis include a typical versus extreme rain event, mobilizing the same pollutant load and that the results of this analysis will yield a result more representative of natural conditions. As included in the FEIS, the estimates provided are based on a ‘typical’ rain event. The 2-year/24-hour and 1-year/1-hour rain events are believed to be representative of ‘typical’ rain events in the analysis. The 50-year rain event also is included in the analysis and considered an extreme event.
- USEPA indicated concerns that the DEIS does not identify the specific measures that will be required before, during and after blasting to insure that the integrity of structures, wells and karst subsurface openings remain intact. The FEIS notes that a commitment in the Section 4 Biological Assessment (BA) states that blasting will be avoided between September 15 and April 15 in areas within 0.5 mile of known Indiana bat hibernacula. All blasting in the Winter Action Area will follow the specifications developed in consultation with the USFWS to avoid compromising the structural integrity or alter the karst hydrology of nearby caves serving as Indiana bat hibernacula. INDOT Standard Specifications require specific pre- and post-construction documentation and blasting controls to assure no property damage occurs outside of the INDOT right-of-way as a result of highway blasting. INDOT Standard Specifications also state that exploratory drilling, for the purpose of determining the existence of cavities affecting underground drainage and possible sinkholes in cut sections, may be required. Any subsurface karst features identified will be treated in accordance with the karst MOU.
- USEPA recommended that the FEIS explain INDOT's proposed project development and contracting process including a timeline and approval authority for incorporation of project-specific design elements/features and BMPs required by INDOT for project construction and operation. **Table 5.21-2a** has been added to Chapter 5.21 and **Table 7-1a** has been added to Chapter 7 of the FEIS. BMPs and possible design elements for possible karst situations are included. Also, Design/Build (D/B) is currently not anticipated to be a major component of the Section 4 project delivery. However, if the D/B project delivery method is chosen, appropriate conditions will be incorporated into the contract for treatment of karst features.
- Text changes for Chapter 7 (Mitigation, page 7-43) regarding Class V permits were suggested by USEPA. The referenced text was removed and replaced in Chapters 5.21.4, 5.23.8, 7.3.4, and 7.3.17 of the FEIS.
- USEPA offered clarifying language about Class V injection wells. The recommended text change has been made in the Chapters 5.21.4, 5.23.8, 7.3.4, and 7.3.17 of the FEIS.
- **Appendix Q**, *INDOT SOP's – Wells, Asbestos, Snow & Ice Removal*, of the FEIS describes snow and ice control objectives for Class I roadways in response to an USEPA comment.

A summary of the comments on the draft C/R document received from IDEM (3-23-11) and the modifications made to the draft responses to comments are as follows:

- To reduce additional direct impacts, IDEM asked that INDOT ensure all borrow and waste disposal sites are located in non-forested upland areas and at a distance from Waters of the State that they will not result in secondary impacts such as draining wetlands, lowering the water table, and cutting off a watershed to a wetland. As indicated in the FEIS, borrow and waste disposal site locations will be determined during the design phase and INDOT is not



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able to identify sources of borrow material because it has no legal authority to mandate that specific properties be used for a transportation purpose unless it can be established that this property is required for the project, and that none other will serve the purpose. Contractors must comply with all permitting requirements for borrow locations, and follow other applicable INDOT Standard Specifications.

- IDEM indicated concerns about a high potential for stream degradation. It suggested that, during stream crossing design, structures that will require the stream manipulation be avoided. The FEIS indicates that reasonable efforts will be made to avoid stream manipulation and relocations. Furthermore, coordination with IDEM Office of Water Quality has been initiated and will continue throughout the development of the proposed mitigation sites that will be offered for compensatory mitigation in Section 4.
- IDEM indicated concerns that there was no discussion specifically related to the types of materials and rates of applications to be used for snow and ice removal in karst topography. The FEIS indicates that per INDOT's Snow and Ice Control memorandum (**Appendix Q** of the FEIS), it is impractical to develop specific rules for every winter storm event situation due to the numerous variables involved in winter storms. The judgment of the District Maintenance Director, Sub-District Managers, and the Unit Foreman will govern the type, quantities and application schedules used for INDOT's snow and ice control services. It is anticipated that salt (sodium chloride) and brine (salt water) would be used as deicing agents on I-69. As defined in the Section 4 BA, low salt zones will be defined within any drainage area of a karst feature which is used for highway drainage. A signing strategy will also be developed for the project. Further coordination with the Karst MOU agencies will occur during the design phase of the project regarding low-salt zones. This commitment has been added to Chapters 5.21 and 7 of the FEIS.
- IDEM indicated that erosion and sediment control will be the most crucial part of this project during construction. Design and implementation of erosion and sediment control measures will be in accordance with 327 IAC 15-5 (Rule 5 - Construction/Land Disturbance Storm Water Permitting). The FEIS has been updated to use the October, 2007 version of the Indiana Storm Water Quality Manual.
- IDEM indicated concurrence with Interchange Option #1, which includes interchanges at SR 45, Greene/Monroe County Line with a South Connector Road and SR 37. The recommendation that the South Connector Road access be limited to the SR 45/SR 445 intersection was also noted. A commitment for the Greene/Monroe County Line Interchange connector road to be fully access controlled is stated in Chapter 6.3.1 of the FEIS. With regards to IDEM comments on the crossing of Indian Creek by the South Connector Road, the FEIS notes that the alignment of the South Connector Road was designed to minimize stream impacts to Indian Creek while also avoiding further impacts along Carter Road and minimizing bridge costs. The construction limits of the South Connector Road alignment fall to the north and upstream of the Indian Creek meander and do not have any lateral impacts along the stream. Further shifts to the north of the connector road would push the interchange ramps into Carter Road, cutting off access to several homes and large tracks of land north and west of the interchange and connector road. Shifting the connector road to the north would also introduce longer skewed bridges over Carter Road and the I-69 mainline, which are undesirable.



A summary of the comments on the draft C/R document received from IDNR (3-3-11) and the modifications made to the draft responses to comments are as follows:

- IDNR recommended that consideration be given to the North Connector Road. The FEIS acknowledges that the South Connector Road will incur generally higher impacts and costs in comparison to the North Connector Road due to the longer roadway length. These higher costs and impacts were considered and weighed against traffic performance and safety aspects associated with the North and South Connector Road options. The South Connector Road was included in the Preferred Alternative because it demonstrated the best transportation performance and associated traffic reductions on SR 45 between SR 445 and SR 37, provides a direct connection for travel between Eastern Greene County/Bloomfield and the Bloomington urbanized area, and replaces an unconventional and potentially confusing intersection (SR 45/SR 445) with a safer conventional four-leg intersection.
- IDNR suggested that consideration be given to the use of County Road 150N/Carter Road as an exit at the Greene County/Monroe County line. The FEIS indicates that the primary traffic that is predicted to shift to I-69 via the Greene/Monroe County Line interchange currently travels eastbound from Bloomfield/eastern Greene County via SR 445 and then northbound along SR 45 to the Bloomington urbanized area. Two connector road corridors for access from SR 45 to the Greene/Monroe County Line interchange were studied in the Alternatives Carried Forward (please see Chapter 3.4). The South Connector Road, which is included in the Section 4 Preferred Alternative, intersects SR 45 about 500 feet south of the current SR 445/SR 45 intersection. The North Connector Road intersects SR 45 about 0.7 miles to the north of the SR 445/SR 45 intersection. Both access points are along the current travel route between Bloomfield/eastern Greene County and the Bloomington urbanized area. The Carter Road (CR 150N) intersection with SR 45 is not along the current travel route for eastbound travel from Bloomfield/eastern Greene County area (via SR 445) to the Bloomington urbanized (via SR 45) and was not included as an access route between SR 45 and the Greene/Monroe County Line interchange in the Alternatives Carried Forward. Additional travel of about 0.5 miles south along SR 45 provides access to Carter Road.
- IDNR indicated that appropriate mitigation measures should be implemented where the highway crosses significant areas of wildlife habitat and that any lights along the highway where it is crossing a significant habitat area should be put on the shortest poles possible to limit the spread of light and should be shielded so the light shines only on the highway and not up or out from the road. Lighting is discussed in Section 7.3.6 “Visual Impacts” of the FEIS. On page 119 of the Tier 2 Section 4 BA, it has been committed that any lights installed will be at least 40 feet above the highway in order to deter collisions between bats and vehicles. Non-diffuse lighting will be used when possible. Details of lighting will be identified during the final design.
- IDNR recommended that when where wetland impacts are unavoidable, crossing wetlands with an appropriate number of adequately-sized bridges or three-sided box culverts will minimize the impacts to the wetland's hydrology and minimize the effects of the fragmentation of the habitat. The use of bridges is recommended over culverts. The FEIS indicates that wetland impacts were minimized to the extent practicable during the development of alternatives. Some impacts were unavoidable and specific impacts upon individual wetlands such as wetland hydrology impacts and habitat fragmentation will be



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further addressed during the post-NEPA permitting process. The definitive types of structures used to cross wetlands will be further addressed during the permitting process. As part of mitigating for wetland impacts, where reasonable and feasible, structures will be designed to minimize impacts to the wetland’s hydrology. The final wetland and stream mitigation package will be developed through coordination with the USACE and IDEM, as well as IDNR within regulated floodways, to ensure that it fully addresses their mitigation requirements.

- Several measures were recommended by IDNR to further minimize losses to fish, wildlife, and botanical resources. The FEIS indicates that an IDEM Rule 5 erosion control plan will be completed and require approval from IDEM prior to any construction activities beginning. The erosion control plan will be designed to control erosion and sediments from entering streams and/or wetland areas or leaving the construction site. Commitments that were made in Tier 1 and will also be included in Tier 2 for Section 4 will limit tree clearing to April 1 to September 30 in the Indiana bat Summer Action Area and November 15 to March 31 in the Winter Action Area. These commitments also limit stream work from April 1 through June 30 without approval of IDNR Division of Fish and Wildlife.

11.3 Public and Community Outreach

11.3.1 Outreach Activities

In addition to public information meetings (See Section 11.3.3.) several outreach activities were organized to provide information to the public and identify issues. These activities are summarized below, and listed on **Table 11-1**.

Table 11-1: Section 4 Outreach Activities		
Date	Meeting With	Purpose
2004		
6-29	PRESS BRIEFING	Interviews with media to kick off I-69 Evansville to Indianapolis Tier 2 studies.
6-29	PUBLIC OFFICIALS, SECTION 4 PROJECT OFFICE OPEN HOUSE	Introduce project team, update officials on current project status and tasks ahead, obtain input regarding issues that should be studied.
7-1	PROJECT OFFICE OPEN HOUSE	Introduce project team, update officials on current project status and tasks ahead, obtain input regarding issues that should be studied. Attendance: approximately 250.
7-12	SECTION 106 CONSULTING PARTIES	1 st meeting of Section 4 consulting parties.
8-5	BLOOMINGTON AND MONROE COUNTY PLAN COMMISSIONS	Introduce Tier 2 of the project; discuss status of the project and answer questions.
8-12	RESOURCE AGENCIES MEETING: All Sections	1 st Tier 2 meeting with agencies and all sections to advise agencies of status of environmental work in each section; obtain agency comments, issues.
9-29	VICTOR OOLITIC QUARRY	Introduce Tier 2 of the project; discuss status of the project and answer questions.
10-18	TIMBER TRACE SUBDIVISION	Introduce Tier 2 of the project and assist the community in selecting a CAC representative.
10-21	INDEPENDENT LIMESTONE QUARRY	Introduce Tier 2 of the project; discuss status of the project and answer questions.
11-10	KARST TECHNICAL TEAM	Gather information on karst feature locations from interested stakeholders.



I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

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Table 11-1: Section 4 Outreach Activities		
Date	Meeting With	Purpose
12-2	COMMUNITY ADVISORY COMMITTEE	1st meeting: members identify issues.
12-17	VAN BUREN TOWNSHIP FIRE DEPARTMENT	Introduce Tier 2 of the project; discuss status of the project and answer questions.
2005		
1-20	MONROE COUNTY PLANNING AND ENGINEERING	Discuss highway access and methods to control growth in karst areas.
2-10	MONROE COUNTY LAND USE	Discuss Traffic Analysis Zones and other project information.
2-23 & 2-24	RESOURCE AGENCIES MEETING: All Sections	Update Resource Agencies on status of project, by section; field trip to see sensitive sites in Sections 1, 2, and 3.
3-7	TAYLOR TOWNSHIP SCHOOLS	Provide updates on project status; elicit general info regarding potential impacts to access and school bus routes.
3-16	GREENE COUNTY LAND USE	Discuss areas of growth in Greene County.
4-7	COMMUNITY ADVISORY COMMITTEE	2 nd meeting; discuss project development and access issues.
4-13	MONROE COUNTY LAND USE	Review employment forecast to aid in development of traffic demand model.
4-14	IDEM WATER RESOURCES	Discuss IDEM comments on water resources.
5-6	GREENE COUNTY EXPERT PANEL	Review and, where necessary, revise counties' land use-TAZ data provided on mapping by BLA (employment & residential): existing, no-build, build-I-69 induced changes, for use in traffic projections, cumulative impact analysis.
5-16	GREENE COUNTY FARMERS	Discussed potential impacts to specific properties.
5-25	MONROE COUNTY EXPERT PANEL	Review and, where necessary, revise counties' land use-TAZ data provided on mapping by BLA (employment & residential): existing, no-build, build-I-69 induced changes, for use in traffic projections, cumulative impact analysis.
6-2	COMMUNITY ADVISORY COMMITTEE	3 rd meeting; present refined Preliminary Alternatives, including overpasses and interchange concepts, for review prior to public information meeting set for June 16.
6-16	PUBLIC INFORMATION MEETING #1	1 st public information meeting to present project status and Preliminary Alternatives. Attendance: approximately 400.
7-19	BLOOMFIELD ROTARY CLUB	Introduce Tier 2 of the project; discuss status of the project and answer questions.
7-20	MONROE COUNTY ENGINEERING	Review of access points and grade separations.
8-4	SECTION 106 CONSULTING PARTIES	2 nd meeting, to review historic resources report.
8-17	MONROE COUNTY PLANNING	Review of Alternative alignments and discussion of access issues.
10-18	GREENE COUNTY COMMISSIONERS	Discuss project status and local access issues.
11-10	COMMUNITY ADVISORY COMMITTEE	4 th meeting to discuss screening of Preliminary Alternatives.
11-15	PUBLIC OFFICIALS	Discuss project progress and present refined Preliminary Alternatives.
11-16	PUBLIC INFORMATION MEETING #2	Present refined Preliminary Alternatives, including overpasses and interchange concepts. Attendance: approximately 100.
12-13	CITY OF BLOOMINGTON AND BLOOMINGTON MPO	Discuss I-69 alternatives, and inclusion of I-69 in update of Bloomington Long Range Transportation Plan.
12-19	RESOURCE AGENCIES WEBCAST	Section 4 "Streamlining" meeting #1 with Resource Agencies, to receive comments about S4 P&N Package sent to agencies.
2006		
4-20	COUNTY LINE INTERCHANGE NEIGHBORHOOD	Inform residents about potential SR 45 connector road.
6-13	UTILITY MEETING	Give utility representatives an overview of the project and asked utility companies to provide maps of their facilities in the corridor.
6-29	TIER 1 RE-EVALUATION OPEN HOUSE	Provide public with opportunity to learn about and comment on the Tier 1 Re-evaluation Report.
7-19	GREENE COUNTY EMERGENCY RESPONDERS AND SCHOOL DISTRICTS	Discuss grade separations and road closures.
8-1 & 8-2	RESOURCE AGENCIES MEETING: All Sections	Update Resource Agencies on Tier 1 Re-Evaluation and status of project by section, and discuss tolling, permitting, potential impacts, etc.; field trip to see sensitive sites in Sections 4, 5, and 6.



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Table 11-1: Section 4 Outreach Activities		
Date	Meeting With	Purpose
8-31	RESOURCE AGENCIES WEBCAST	Section 4 “Streamlining” meeting #2 with Resource Agencies, to receive comments about the Section 4 Alternatives Screening/Evaluation Package sent to agencies.
2007		
3-1	RESOURCE AGENCIES MEETING: All Sections	Update Resource Agencies on status of project by section, and discuss the Section 1 DEIS and comments, potential impacts, etc.
2008		
7-31	FERN HILLS CLUB INCORPORATED	Review alternatives and discuss potential impacts.
2009		
4-30	RESOURCE AGENCIES MEETING: All Sections	Update Resource Agencies on status of project, by section.
5-17	Linton Stockton Chamber of Commerce	Update chamber on overall project status, with emphasis on Sections 3 and 4.
6-17	MONROE COUNTY PLANNING	Review alternatives through Monroe County.
7-29	MONROE COUNTY PLAN COMMISSION	Review alternatives through Monroe County.
8-5	MONROE COUNTY EMERGENCY RESPONDERS	Review alternatives, grade separations and road closures.
8-7	GREENE COUNTY EMS RESPONDERS	Review alternatives, grade separations and road closures.
2010		
8-24	COMMUNITY ADVISORY COMMITTEE	5 th meeting to discuss DEIS Alternatives, for review prior to Public Hearing meeting set for August 26, 2010.
8-26	PUBLIC OFFICIALS	Present DEIS Preferred Alternative, including overpasses and interchange concepts.
8-26	PUBLIC HEARING	Present DEIS Preferred Alternative, including overpasses and interchange concepts. Attendance: approximately 400.
9-13	CARTER ROAD RESIDENTS	Meeting to discuss the recommendations for local access in Greene County.
9-14	VAN BUREN TOWNSHIP TRUSTEE, VAN BUREN TOWNSHIP VFD, PERRY-CLEAR CREEK FD, MONROE COUNTY EMA	Meeting to discuss the recommendations for local access in Monroe and Greene Counties.
9-15	SIERRA HILLS NEIGHBORHOOD RESIDENTS	Meeting to discuss the recommendations for local access in Monroe County.
9-16	EASTERN GREENE SCHOOLS	Meeting to discuss the recommendations for local access in Greene County.
9-16	BLOOMFIELD SCHOOLS	Meeting to discuss the recommendations for local access in Greene County.
9-16	HARMONY ROAD RESIDENTS	Meeting to discuss the recommendations for local access in Monroe County.
10-6	LIGHTHOUSE CHRISTIAN ACADEMY	Meeting to discuss the recommendations for local access in Monroe County.
10-12	VICTOR OOLITIC LIMESTONE COMPANY	Meeting to discuss the recommendations for alignment selection.
10-12	INDIAN CREEK TOWNSHIP TRUSTEE AND INDIAN CREEK VFD	Meeting to discuss the recommendations for local access in Monroe and Greene Counties.
10-13	CENTER TOWNSHIP VFD, JACKSON TOWNSHIP-OWENSBURG VFD, RICHLAND-TAYLOR TOWNSHIP VFD	Meeting to discuss the recommendations for local access in Greene County.
10-14	INDEPENDENT LIMESTONE COMPANY	Meeting to discuss the recommendations for alignment selection.
10-14	CLEAR CREEK ELEMENTARY SCHOOL AND MONROE COUNTY COMMUNITY SCHOOL CORPORATION	Meeting to discuss the recommendations for local access in Monroe County.
10-18	BLOOMINGTON HOSPITAL AND AMBULANCE SERVICE (BHAS) AND RURAL TRANSIT	Meeting to discuss the recommendations for local access in Monroe and Greene Counties.
10-19	GREENE COUNTY AMBULANCE SERVICE	Meeting to discuss the recommendations for local access in Greene County.
10-20	BLOOMINGTON TOWNSHIP FD AND CITY OF BLOOMINGTON FD	Meeting to discuss the recommendations for local access in Monroe and Greene Counties.
10-20	VICTOR HEIGHTS SUBDIVISION	Meeting to discuss noise/visual impacts and the recommendations for local access in Monroe County.



Date	Meeting With	Purpose
10-20	ROLLING GLEN ESTATES SUBDIVISION	Meeting to discuss noise/visual impacts and the recommendations for local access in Monroe County.
11-17	CITY OF BLOOMINGTON ENGINEERING, BLOOMINGTON/MONROE COUNTY MPO, AND MONROE COUNTY HIGHWAY DEPARTMENT	Meeting to discuss the recommendations for local access in Monroe County.
11-24	GREENE COUNTY COMMISSIONERS AND HIGHWAY DEPARTMENT	Meeting to discuss the recommendations for local access in Greene County.
12-09	GREENE COUNTY COMMISSIONERS AND HIGHWAY DEPARTMENT	Meeting to discuss the recommendations for local access in Greene County.
12-20	CITY OF BLOOMINGTON ENGINEERING, BLOOMINGTON/MONROE COUNTY MPO, MONROE COUNTY COMMISSIONER, AND MONROE COUNTY PLANNING DEPARTMENT	Meeting to discuss the recommendations for local access in Monroe County.
2011		
4-5	GREENE COUNTY COMMISSIONERS AND HIGHWAY DEPARTMENT	Meeting to discuss the recommendations for local access in Greene County.
Acronyms from Table		Full Name
	IDEM	Indiana Department of Environmental Management
	TAZ	Traffic Analysis Zone
	BLA	Bernardin Lochmueller and Associates
	MPO	Metropolitan Planning Organization
	P&N	Purpose and Need

- 1. Project Office Open Houses were held to introduce the project.** An open house hosted at the local project office on July 1, 2004, presented the scope and schedule of the environmental and engineering work to the general public. The open house allowed the public to become more familiar with the project office and staff. It also provided an opportunity for project staff to meet the public and identify stakeholders, potential members for the Community Advisory Committee (See Section 11.3.2), and potential Section 106 consulting parties (See Section 5.13.2.1). Comment forms were provided to the public, and people were invited to be added to the project mailing list. About 250 persons attended the open house. Materials from the open-house activities, such as corridor maps and a PowerPoint presentation are available on the project website at www.i69indyevn.org.

Before the open house, on June 29, 2004, a meeting was held to provide the same information to public officials. The invitation list included the following: Federal and state representatives; mayors; county commissioners and council members; city, town and county administrators and councils, economic development directors, chamber of commerce members, and emergency response officials.

The public officials were provided access to the same presentation materials and handouts as were provided later at the open house. The meeting allowed the project staff to become acquainted with individuals who could provide valuable information about local communities. It also allowed local leaders to learn more about the project and present issues important to their constituencies.



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Also at this time media briefings were held to familiarize the media with the project team, and project scope and schedule. Media outlets were provided information on the history of the project, as well as information on how to contact members of the project team. The meetings were also meant to assist the media in accurately and effectively communicating information regarding the project to the public.

2. **Outreach meetings were held with various community, business, and civic groups as well as others.** Informal gatherings were conducted to introduce the project or update the public on the studies. The meetings helped identify community issues and served as a forum for addressing local questions. Through these informal meetings with groups such as local limestone quarry owners, farmers, and the Bloomfield Rotary Club, project team members were able to gather information useful in determining local needs and community impacts. Meetings were held with representatives of the Timber Trace subdivision community and the county line interchange neighborhood on October 18, 2004, and April 20, 2006, respectively, to discuss the project and answer questions.
3. **Local government outreach meetings were conducted throughout the studies.** These meetings were conducted to ensure project stakeholders' awareness of the project status and to allow opportunity for their input. Public officials were made aware of the latest project information so as to allow them to better understand the process of the studies and relay opportunities for public input to their constituencies.
4. **Tier 1 Re-evaluation Open House.** An open house was held at the AMVETS Post 2000 meeting hall near Bloomington, Indiana, on June 29, 2006, to give the public an opportunity to learn about and comment on the Tier 1 Re-evaluation Report and to learn about the latest progress on Section 4 of the Tier 2 study.

11.3.2 Community Advisory Committee

A Community Advisory Committee (CAC) was developed to serve in an advisory role to INDOT and the project team. The CAC was created to allow the project team to understand the perspectives of stakeholders and communities. The CAC also served as a way to explain technical information in a small group setting and enable the CAC members to relay important project information to their representative groups.

The CAC was developed through identification of key stakeholders; groups with an interest in the project or that may be impacted by the transportation project. Through a stakeholder identification process, representatives of the following were invited to participate:

City, town and county elected officials; representatives of parks, recreational and natural areas; environmental groups; neighborhood/community groups; civic groups; human service organizations; chambers of commerce and business leadership groups; economic development groups; regional departments of commerce; regional planning organizations; agricultural organizations; community organizations; healthcare institutions; and local transportation agencies.



An emphasis was placed on developing a CAC with varying interests and opinions, with a priority of creating an environment that encouraged open and productive dialogue. The views expressed by the CAC were considered with all other public and agency comments.

To date the CAC has met five times, coinciding with project milestones. On December 2, 2004, the CAC convened for the first time to become familiar with the project and to meet the project staff. Details of work completed to date were shared with members. CAC members also helped identify local issues. The second meeting was April 7, 2005, to review project development process and access issues. The third CAC meeting was held June 2, 2005, to review the development of the Purpose and Need Statement and Preliminary Alternatives. The CAC members provided feedback on issues such as local access, splitting of farmland, and other local issues before the information was presented a short time later at a public information meeting. CAC members provided feedback to team members regarding the changes made to the alternatives and additions to improve local access before the information was presented a short time later at a public information meeting. The fourth CAC meeting was held on November 10, 2005, to discuss screening of the Section 4 alternatives. The group provided feedback for the project team to use in selecting the recommended Alternatives Carried Forward for more detailed analysis. The fifth CAC meeting was held on August 24, 2010, to discuss the DEIS alternatives. CAC meeting summaries are provided on the project website at www.i69indyevn.org/cacmeeting.html, as well as in **Appendix EE, CAC and Public Information Meeting Summaries**.

11.3.3 Public Meetings and Public Hearing

Public information meetings were conducted to coincide with project milestones. The meetings offered an opportunity for the general public to receive updated information on the project and to provide feedback on the alternatives presented for discussion. Each followed a similar format. The meetings were scheduled for weeknight evenings. During the first hour of the meetings, the public viewed maps and display boards and were able to speak with project team members individually. The second hour began with a PowerPoint presentation made by the section project manager in which the factors considered during development of the alternatives were presented, along with a study update for the project. After the presentation, public officials were offered an opportunity to make a comment to the group. They were followed by comments from the general public. Comment forms were also provided to the public. They could be filled out and turned in at the meeting or mailed to the project office at a later time. The third hour of the meetings was reserved for additional review of the displays and answering one-on-one questions from the public.

The first meeting was 5:30 p.m. June 16, 2005, at the AMVETS Post 2000 near Bloomington, Indiana. The meeting presented Preliminary Alternatives and sought input on local needs. Approximately 400 people attended the meeting. Each visitor was given handouts that included maps of the alternatives, the Tier 1 Purpose and Need, possible local needs, and answers to frequently asked questions. Also provided at display tables were handouts of the maps exhibited and of the corridor, a brochure explaining the CAC process, information cards (including project contacts and the project hotline number and website), and literature on how land is purchased for highways.



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The second meeting was 5:30 p.m. November 16, 2005, at Eastern Greene High School near Cincinnati, Indiana. The meeting presented refined alternatives, including interchange configurations and locations. The draft Purpose and Need Statement was available on the project website prior to the meeting to allow for public input at this meeting as well. About 100 people attended the meeting. Each person was given maps of the refined alternatives. Additionally, a corridor map, copies of the project newsletter, project information cards, and other literature were provided.

The Draft Environmental Impact Statement Public Hearing was held at 5:00 p.m. on August 26, 2010. More than a month prior to the public hearing, the Section 4 DEIS (dated July 2010) was published and made available to the public at several locations including project area libraries and all I-69 project offices. The document was also posted on the project website. The public hearing on the DEIS featured a display session, with maps showing alternatives studied in the DEIS, and charts illustrating key findings in the document. The formal portion of the meeting involved the presentation of the preferred alternative identified in the DEIS. Following a formal presentation of the information in the DEIS, public comments were recorded. The public was also invited to submit written comments until the close of the comment period, October 28, 2010. The meeting was attended by approximately 400 people. Handouts included a summary of key features of the DEIS, including maps and descriptions of the preferred alternative. Comment sheets were also available. Comments given during this hearing and resulting from the hearing are given in Volume III.

Notice of each meeting was published in local newspapers at least two weeks prior to the events. Notice was also posted to the project website as well as the INDOT website. Postcards announcing the event were sent to identified stakeholders and others expressing an interest in the project. More than 640 postcards were sent for the first meeting. The mailing list grew to more than 720 for the second meeting and 990 for the Public Hearing. News releases were sent to local media one week prior to the meetings, followed by a news advisory sent two days before the meetings.

The number of public comments received and project office visits increased in the days following the public information meetings. Table 11-2 summarizes the number of comments and office visits, as of April 13, 2011. Materials presented at the meetings also were posted to the project website leading to an increase in visits and document downloads from the site.

Table 11-2: Project Office Visits and Public Comments (as of April 13, 2011)										
	Public Officials Open House	General Public Open House	Office Visits	Correspondence (Represents number of communiqués received: some people submitted more than one)				Persons Making Statements at Public Information Meetings		
				Comment Forms*	Petitions	Letters	Website** Comments	Meeting #1	Meeting #2	Public Hearing
Total	23***	250	1,310	538	0	592	2,143	35	14	44

* Includes form letter comments received on the DEIS as prepared by a local organization
 ** The Website Comments column lists the number of comments (including questions) about the project that have been received via this source. Requests for handouts or to be put on the project mailing list are not included in the counts.
 ***Joint Section 4 and Section 5 Open House



11.3.4 Hotline

A 24-hour toll-free hotline (1-877-463-9386) was made available for the public to receive updated project information, leave comments for the project team, and allow people to subscribe to the project mailing list. The message included information such as the status of the studies and the location of the local project office. Shortly after the opening of the project office, there was a decrease in the number of messages left, though some people have continued to use the hotline to request being added to mailing lists. Information was forwarded to each section based on the caller's place of residence. Due to continuing low usage, it was discontinued in November, 2010.

11.3.5 Website

The official project website (www.i69indyevn.org) was established at the outset of the Tier 1 Study. It was completely redesigned at the beginning of the Tier 2 studies and again in January, 2008. The Home page contains a contact directory for email, address list, and hotline numbers as well as a What's New? Section listing any new changes to the website. The Project Overview page outlines the history of both Tier 1 and Tier 2 Studies and contains a Frequently Asked Questions section, which provides official statements on key study issues and responses to commonly asked questions. The Resource menu links to pages containing documents from all six sections: Brochures; CAC Meeting Summaries; Handouts; Press Releases; Presentation Materials, which provide maps, handouts, and PowerPoint presentations from public meetings and public hearings; Newsletters & E-news; and Technical Reports. The Maps page contains maps listed by section and event, and resource links including the DEIS download page, if applicable.

Table 11-3 indicates the number of visits to a particular area and certain documents on the Section 4 web page within the project website. The project website was launched on June 21, 2004. The information below presents website usage from March 1, 2008, to April 28, 2011. When visitors to the Section 4 home page view the page, they see topic "tabs" (indicated in the table by "Tab with Links to Documents") on which they can click for further information. Numbers corresponding to those tabs indicate a visitor clicked on that tab and viewed a list of related information available. Numbers corresponding to documents or a grouping of documents under a specific subtitle indicate the number of times those documents were viewed.

Documents can be accessed other than via the topic tab. For example, when new material such as maps and news releases are posted, the web master will provide a temporary "news flash" text box indicating what has been added and providing a direct link. Since a visitor may click on a specific topic tab and may then exit, and since documents listed under topic tabs may be otherwise accessed, the total number of document viewings may be more than the number of times a topic tab was clicked.



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The refined alignment alternative maps were posted after the Public Hearing, August 26, 2010.

Table 11-3: Section 4 Website Activity Summary	
Location	Visitors
Section 4 Home Page (Total Visits as of April 1, 2011)	7,238
Section 4 Comment Form	2,143
Section 4 Mailing List	1,600
Section 4 News Releases	8,064
Office Addresses	4,017
Brochures and Handouts	
<ul style="list-style-type: none"> • Section 4 Brochure • Section Milestones • Newsletter 12/04 	<ul style="list-style-type: none"> 1,281 55 1,469
FAQ (Frequently Asked Questions)	7,223
Maps (# PDF Downloaded)	
<ul style="list-style-type: none"> • Preferred Alternatives (DEIS) <ul style="list-style-type: none"> ○ All Maps with Key ○ Individual Map Downloads (16 maps) • Refined Alternatives (Total of 11 maps) • Preliminary Alternatives (Total of 7 maps) • Open House Displays (Total of 13 maps) • Detail Map 	<ul style="list-style-type: none"> 74,481 26,937 40,533 3,847 5,830 436
Technical Reports & Documents	
<ul style="list-style-type: none"> • Green County Air Quality Report • Historic Properties Report • Draft Purpose and Need • Draft Preliminary Alternatives Development Methodology • Preliminary Alternatives Analysis and Screening Report • CAC Meeting Summaries 	<ul style="list-style-type: none"> 1,822 525 1,118 349 2,361 2,187
Meeting Handouts	
<ul style="list-style-type: none"> • DEIS Public Hearing <ul style="list-style-type: none"> ○ PowerPoint ○ Handout ○ Local Access Plan Map ○ Typical Cross Section • CAC Membership • CAC Benefits • CAC Mission • Section 106 Consulting Parties Meeting – Maps of Draft Alternatives • Section 106 Consulting Parties Meeting – Overview Map • Section 106 Consulting Parties Meeting – Minutes • Section 106 Consulting Parties Meeting – Historic Property Effects • Section 106 Consulting Parties Meeting – Assessment of Adverse Effects • Section 106 Consulting Parties Meeting – Agenda 	<ul style="list-style-type: none"> 5,058 891 688 200 552 538 310 838 499 370 211 212 307



Table 11-3: Section 4 Website Activity Summary

Location	Visitors
• Karst Overview	585
DEIS Download Page	3,842
• DEIS PDF Downloads	47,993
• DEIS Hardcopy Locations	274

11.3.6 Newsletter

In December 2004 a project newsletter was sent to more than 650 identified stakeholders in Section 4 and others who expressed an interest in the project. The newsletter addressed corridor-wide topics and various section news items. Copies were also distributed at the project office and made available at public information meetings. The newsletter provided historical information, an update on environmental studies, ways for the public to provide input on the project, answers to frequently asked questions, and ways to receive additional information on the studies or to talk with project team members.

11.3.7 Project Office

From the outset, the study team has worked to maximize opportunities for two-way communication with the public. To make access to information and opportunities to comment on the project more convenient for the public, a project office was established at 3802 Industrial Boulevard, Suite # 2 in Bloomington, Indiana. The office is located near the northern terminus of the 27-mile corridor.

The project office was introduced to the public at the open house on July 1, 2004 (See Section 11.3.1). The proximity to the Study Area and ease of access encouraged people to stop by the office to see the latest reports or discuss the project with team members. The office saw a spike in visitors in the days following the public information meetings. (See **Table 11-2** for a summary of visits to the project office.) Many people unable to attend the meetings have visited the project office to receive handouts and review maps. Others who attended the meetings have visited the office with additional questions or issues. The project office has also been used to host Section 106 consulting parties meetings and other meetings. The presence of a local project office has facilitated a sense of openness and continuing dialogue with community members.

Originally, the project office was open on weekdays from 8 a.m. to 5 p.m. On September 26, 2008, the Section 5 project team closed its downtown Bloomington office and moved to the Section 4 office. The combined office is open Monday through Friday from 9 a.m. to 4 p.m. To accommodate those people unable to visit during regular hours, team members also are available to meet by appointment.



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On April 15, 2011, the Section 4/Section 5 project office was changed to project team staffing on one day each week (Wednesdays from 9 a.m. to 4 p.m.). The project office is staffed on all other days of the week by INDOT.

11.4 Agency Review and Coordination

11.4.1 Notice of Intent

FHWA published a notice of intent (NOI) in the *Federal Register* on April 29, 2004, advising the public that a Tier 2 Environmental Impact Statement (EIS) would be prepared for the proposed Section 4 of the Evansville to Indianapolis I-69 highway. The NOI stated that a scoping process would be initiated that would include “appropriate resource agencies.” It further stated that the resource agencies and the public would have opportunities for input during the scoping process and throughout the development of the proposed project.

The ongoing public involvement opportunities and input received to date are described in Sections 11.1 through 11.3. The involvement of environmental resource agencies in the scoping and development of the project for Section 4 is described in the following sections.

11.4.2 Agency Coordination

11.4.2.1 Introduction

The “Indiana Streamlined EIS Procedures” as approved by FHWA, Indiana Division, are being followed for formal coordination with the environmental resource agencies. The purpose of the procedures is to establish a coordinated planning and project development process for major transportation projects in Indiana. These procedures include publishing an NOI (See Section 11.4.1), and early and ongoing coordination with environmental resource agencies.

Early coordination was undertaken with regulatory agencies through submittal of materials to the agencies prior to the first agency coordination meeting in August 2004 (summarized below). The materials included project brochures for each of the six sections of I-69, a project area map showing the six sections, and a discussion paper concerning Purpose and Need, the No-Build Alternative, and the approach to Alternatives analysis.

Coordination is continuing, and meetings are being held at key intervals to accomplish project goals that include: development of a Purpose and Need Statement, identification of environmental features and existing conditions in the project area, selection of alternatives worthy of detailed analysis in the DEIS, and recommendation of a Preferred Alternative. Key agency coordination meetings to date are discussed in the following section and summarized on **Table 11-4**. Meeting summaries or minutes are included in **Appendix C, Agency Coordination Correspondence**.

11.4.2.2 Coordination

Meetings With All Tier 2 Sections



August 12, 2004—Interagency Scoping Meeting: The first environmental resource agency meeting for the Tier 2 studies was held August 12, 2004, in Indianapolis. The meeting included all six sections of the Tier 2 studies corridor. All environmental resource agencies listed in the *Procedural Manual for Preparing Environmental Studies* (INDOT, August 2003) were invited. Agency representatives attending the meeting, in addition to FHWA and INDOT, included Indiana Department of Natural Resources (IDNR), Division of Fish and Wildlife, Division of Nature Preserves, and Division of Historic Preservation and Archaeology (DHPA); Indiana Department of Commerce; Evansville MPO (the MPO formerly known as Evansville Urban Transportation Study (EUTS)); Indiana Geological Survey; U.S. Army Corps of Engineers (USACE); U.S. Department of the Interior, Fish and Wildlife Service (USFWS); IDEM, Offices of Water Quality-401 and Wetlands; Bloomington MPO; Indianapolis MPO; U.S. Environmental Protection Agency (USEPA), Region 5; Crane NSWC; and U.S. Department of Agriculture (USDA), Forest Service.

The purpose of the meeting was to familiarize the environmental review agencies with the scope and status of environmental survey activities associated with the Tier 2 studies; to introduce the Project Management Team, agency representatives, and the consultants responsible for each of the six sections; acquaint agency representatives with the Tier 2 project corridor, overall project Purpose and Need, public involvement efforts, and project schedules. Each section gave a brief presentation summarizing activities to date and planned, followed by questions from the floor. The Section 4 summary and responses to questions included the following:

- It was noted that Virginia Iron Works (VIW) is eligible for the National Register of Historic Places (NRHP) as an archeological site.

December 14, 2004—Interagency Tier 2 Water Resource Coordination Team Meeting: This meeting was held to review the methodology being used for wetland and stream analysis, to provide an Indiana bat study update, and to provide information on Quantm. This meeting established that some sections have slightly varying methodologies because the environmental setting, and types of impacts are different, and the PMC will be the agencies' main point of contact.

February 23-24, 2005—Interagency Coordination Meeting and Field Review of Sections 1, 2, and 3: The second environmental resource agency meeting for all six sections of the Tier 2 studies corridor was held February 23-24, 2005, in Washington, Indiana. Agency representatives attending the meeting, in addition to FHWA and INDOT, included IDNR Divisions of Fish and Wildlife, Water, Forestry, Soil Conservation, and Historic Preservation and Archaeology; Indiana Geological Survey; USFWS; IDEM Offices of Air Quality and Water Quality-401; USEPA Region 5; and USDA Hoosier National Forest and Natural Resources Conservation Service (NRCS).

The first day's agenda included a general meeting involving all participants followed by breakout sessions to discuss specific topics of interest. The general session focused on explaining the steps in the formal agency coordination process that each Tier 2 study will follow; identifying project schedules and timeframes; explaining how local needs and goals will be identified and incorporated into the Purpose and Need Statements of each section; and discussing



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how Preliminary Alternatives will be developed and evaluated. Each section then gave a brief presentation summarizing activities to date and planned, followed by questions from the floor. The Section 4 summary and responses to agencies' questions included the following:

- Lack of planning and zoning regulations in Greene County was a concern to resource agencies.
- Establishing local land use planning will not be a requirement for communities along the route.
- Alternatives will not be considered unless they are consistent with the Tier 1 decision to build a highway from Evansville to Indianapolis.
- Economic development objectives may be considered in deciding how to complete the project. For example; economic development may affect decisions regarding access points along I-69.
- Encroachment near Crane NSWC is not a concern for base officials, but providing safe transportation for the base's employees is a concern.
- The DEIS should include a detailed assessment of secondary and cumulative impacts near Crane NSWC.

When the general session concluded, Section 4 was presented at the Interagency Water Resources breakout session. This session focused on guidance for wetlands and stream activities including identification, evaluation of impacts, and mitigation.

The second day of the agency coordination activities was primarily devoted to a bus tour to give agency representatives an overview of notable features in Sections 1, 2, and 3.

February 23, 2005—Interagency Water Resource Meeting: The meeting purpose was to familiarize the agencies with who is doing the work and how it is being done, and present updates on what has been done so far. The three Part Methodology for wetland resources was discussed and a question and answer session followed.

February 23, 2005—Interagency Karst Breakout Session Meeting: This meeting discussed the purpose of karst studies, how karst features were mapped and evaluated, dye tracing and generally discussed the karst area associated with Sections 4 and 5. Karst areas of interest were discussed as well.

March 22, 2005—USACE and IDEM Wetland and Stream Field Review Meeting: The purpose of this meeting was to establish a consistent approach for water resources in all six sections of the interstate. Ditches, waters of the US, stream mitigation and open water ponds were discussed.

June 22, 2005—IDNR Division of Forestry Coordination Meeting: Discussions involved forest impacts for all six sections but concentrated on Section 4 because of the greatest impacts.



An evaluation of economic impacts as a result of forest lost was discussed as well as the forest mitigation ratios. The IDNR provided comments on alternatives in order to avoid large tracts of forests and managed lands.

August 1-2, 2006—Interagency Coordination Meeting and Field Review of Sections 4, 5, and 6: The third environmental resource agency meeting for all six sections of the Tier 2 studies corridor was held August 1-2, 2006, in Bloomington. Agencies represented, in addition to FHWA and INDOT, included USEPA Region 5; USACE; USFWS-Bloomington Field Office; IDNR, Divisions of Water, Fish and Wildlife, Forestry, and Nature Preserves/Heritage Program; IDEM Offices of Water Quality, Drinking Water, and Permits; and USDA Forest Service/Hoosier National Forest.

The first day's agenda included reviewing the Tier 1 Re-evaluation and overall findings—i.e., Alternative 3C remains the Preferred Alternative; providing agencies with an update on the progress of each of the Tier 2 sections; and responding to agency representatives' questions about the Tier 1 Re-evaluation and issues that have been raised during agency coordination activities to date. Each section then gave a brief summary of activities to date and planned.

The update by Section 4 included an update of the status of completed field work and assessment tasks, and a summary of tasks to be completed. The Section 4 summary and responses to agencies' questions included the following:

- The corridor landscape is over 60% forested or undeveloped land.
- There are several named, perennial streams in Section 4, along with a significant number of smaller order streams. In addition, numerous karst features are present throughout the corridor.

Following the section-by-section updates, presentations were made on the following three topics:

- Cumulative impact analyses, including a review of Tier 1 analyses, the geographic scopes of the Tier 2 analyses, the methodology being used for the Tier 2 evaluations, and updates of each section's analyses. It was noted that farmland, forest, wetlands, streams, and karst/groundwater are the resources identified for cumulative impact analysis in Section 4 owing to the significance of those resources in the Study Area. See Section 5.24 for a full discussion of why these resources were selected for cumulative impact analysis.
- Water resources, including status of coordination with agencies, updates on wetland and stream technical reports in each section, permitting, and mitigation. The majority of stream impacts would be to intermittent and ephemeral streams, although Section 4 does cross seven perennial streams. It was noted that alternatives will be developed to avoid stream realignment, wetlands, floodplains and forests as much as possible.
- Karst features and studies. Field checks were conducted to verify the location of previously recorded karst features, as well as identify and record the location of any new features. It was noted that 28 dye tracing tests were conducted and 31 groundwater flowpaths were identified. Eight groundwater flowpaths were shown to cross the Section 4 corridor.



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The agencies' questions included issues such as how tolling options would be incorporated into the evaluation of alternatives in each section's EIS; how impacts to various resources are being addressed; and what role the expert land use panels played in the analysis of indirect and cumulative impacts.

The second day of the agency coordination activities was primarily devoted to a bus tour to give agency representatives an overview of notable features in Sections 4, 5, and 6.

February 9, 2007—Interagency Permitting and Mitigation Meeting: The meeting was held to discuss mitigation efforts and mitigation focus areas, water resource impacts in each section, and the level of design plans needed for permitting. Forest mitigation ratios were reviewed. Forest mitigation ratios to be applied included:

- 2 to 1 for forest preservation
- 1 to 1 for reforestation of upland forest

Wetland mitigation ratios also were reviewed. Wetland mitigation ratios to be applied included:

- 3 to 1 or 4 to 1 for wetland forest
- 3 to 1 for scrub/shrub wetlands
- 2 to 1 for emergent wetlands

Other topics included a status update of the permitting process, perennial stream mitigation, alternative ephemeral stream mitigation using wetlands or bottomland forest near existing streams, and tracking of mitigation sites and credits.

March 1, 2007—Interagency Coordination Meeting: The fourth meeting was held with federal and state review agencies to update them with the status of environmental survey activities for the Tier 2 studies. The agenda included discussion of INDOT's decision to study only non-toll alternatives for the project; its request to withdraw the Tier 1 Re-evaluation; FHWA's acceptance of that withdrawal; a summary and discussion of comments on the Section 1 DEIS published in December 2006; the status of permitting and mitigation related to wetlands, streams and forests; an update on effects to address cumulative impacts within each Tier 2 section; a discussion of the methodology for tracking and reporting mitigation activities to permitting agencies and USEPA; and an update on the status of potential impacts to karst features.

The presentations included a review of the progress-to-date in Section 4, including the results of the completed Purpose and Need and Screening of Alternatives milestones. Information was provided which detailed alternatives' impacts and costs.

August 19, 2008—Interagency Water Resource Team Meeting: This meeting was held to discuss advanced mitigation construction in Sections 2 and 3. A PowerPoint presentation was



given that provided updates on mitigation sites, long-term management of mitigation sites, wetland banking and permitting.

April 30, 2009—Interagency Coordination Meeting: A fifth one-day meeting with federal and state review agencies was held April 30, 2009. The meeting focused on overview presentations and discussions about the Section 2 DEIS and Section 3 DEIS. The agenda also included updates on the schedules and project status for Sections 4, 5 and 6; Section 1 design and construction; project permitting and mitigation; karst studies in Sections 4 and 5; and the community planning grants. USEPA Region 5 provided a video on bats during the meeting, owing to the significance of the Indiana bat in the Section 4 corridor.

Details of all overall agency meeting discussions are presented in the meetings' minutes located (by date) in **Appendix C**, *Agency Coordination Correspondence*.

Meetings with Section 4

May 27, 2005—IDNR-DHPA Section 4 Field Trip: Several aboveground properties were visited for eligibility. It was decided that the Fullerton House was not architecturally significant. The Vernia mill and Indian Hill areas were also not eligible as aboveground resources.

September 28, 2005—Section 4 Field Trip: In addition to formal agency coordination meetings with all participating agencies, Section 4 project staff participated in a field review of wetland areas and streams crossings in Section 4. Representatives of USACE and IDEM attended the field trip. The purpose of the meeting was to review waters identified within the Section 4 corridor during field studies to evaluate USACE vs. IDEM jurisdiction of the identified water resources. In addition, interpretation of various scenarios was considered to establish a consistent approach to jurisdictional determinations. Several wetland and stream crossing locations were selected as representative of conditions within the corridor. Wetlands impacts are discussed in DEIS Section 5.19, *Water Resources*.

October 28, 2005—Section 4 Wetland and Stream Field Review Meeting: This meeting was held to show the USACE and IDEM water resources within Section 4 and to answer any questions.

December 19, 2005—Section 4 Purpose and Need/Preliminary Alternatives Package Review Meeting: A resource agency coordination meeting/webcast was conducted for Section 4 near Bloomington, Indiana, to review and receive agency comments on Section 4's Purpose and Need Statement and Preliminary Alternatives. Agencies represented, in addition to FHWA and INDOT, were USEPA Region 5 and IDEM.

The discussion focused primarily on the local goals that comprise Section 4's Purpose and Need Statement (See Chapter 2, *Purpose and Need*). It was noted that the needs identified for Section 4 were identified by extensive public involvement activities, and that they support the Tier 1 goals while providing the local focus required of the Tier 2 studies. Regarding the analysis of alternatives within the narrow (primarily 2,000-foot-wide) corridor, it was noted that all alternatives would likely satisfy Purpose and Need equally; therefore the potential social and

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environmental impacts of each alignment would be key determinants in evaluating and comparing alternatives.

The U.S. Forest Service and IDNR provided written comments. The letters are in **Appendix C**. The Forest Service letter (January 13, 2006) noted: “The Purpose and Need for Section 4...is consistent with the Tier 1 FEIS and seems to reflect local needs. The range of alternatives seems adequate.” IDNR’s Division of Historic Preservation & Archaeology’s submittal of December 16, 2005, stated: “We have no particular comments to offer on the draft purpose and need statement for Section 4.” IDNR’s Environmental Unit stated that alternatives developed for I-69 should avoid and minimize impacts to forested habitat, account for impacts from highway light and noise, minimize impacts to riparian habitats, maintain habitat connectivity, and limit impacts to karst features. Subsection impacts are shown in Chapter 6, *Comparison of Alternatives*.

The Purpose and Need package, meeting minutes, and letters from the U.S. Forest Service and IDNR are provided in **Appendix C**.

August 31, 2006—Section 4 Preliminary Alternatives Analysis and Screening Package Review Meeting: A resource agency coordination meeting/webcast was conducted to review and receive agency comments on Section 4’s Preliminary Alternatives evaluation and screening process and recommendations. Agencies represented, in addition to FHWA and INDOT, were USEPA Region 5, USFWS, and IDNR. The primary focus of discussion included the process undertaken by Section 4 to screen the Preliminary Alternatives to identify Alternatives Carried Forward for detailed analysis in the DEIS. **Appendix C**, contains the agency package and the minutes of the meeting.

USEPA Region 5 and IDNR provided written comments (dated September 26 and September 28, 2006, respectively) on the Preliminary Alternatives Package. The letters are in **Appendix C**. USEPA Region 5 also provided comments on specific alternatives, as described below.

- Comment: USEPA Region 5 requested the project team examine the feasibility of a hybrid alternative in Subsection 4A, in order to minimize impacts to wetlands and forest. The hybrid would consist of utilizing Alternative 4A-2 near the US 231 interchange, then crossing over to Alternative 4A-1 near the high tension power line.
- Response: *The feasibility of the hybrid alignment was considered as an Alternative Carried Forward for detailed study. It was determined to designate Alternative 4A-2 as the Preferred Alternative in Subsection A due to engineering and environmental concerns. See Section 6.2.1 for details.*
- Comment: USEPA Region 5 stated roadway alignments in Subsections 4C and 4D had the potential to impact most of the wetlands in Section 4.
- Response: *Wetlands are found throughout and adjacent to the corridor in this location, so any alignment will have similar impacts. Since avoidance is not possible in this location, all reasonable efforts will be made to limit the roadway’s impact, and any direct impacts will be mitigated accordingly.*



IDNR provided comments for each subsection alternative with recommendations, stated the negative effects traffic noise and artificial light have on a variety of wildlife, encouraged the use of context sensitive designs for waterways, floodplains and wetlands, and asked that bridges be designed to accommodate wildlife crossings.

IDNR provided comments on the alternatives and (in some cases) noted the alternative preferred by the agency, as described below. While brief responses to comments are provided below, Chapter 6, *Comparison of Alternatives*, provides a detailed discussion of the advantages and disadvantages of the subsection alternatives and the recommendation of Alternatives 4A-1/4A-2, 4B-1, 4C-1, 4D-1, Hybrid 4E-1/4E-2, 4F-3, 4-G2, and 4H-1 as components of the Preferred Alternative:

- **Comment:** IDNR noted that Alternative 4A-2 had the potential to have heavy impacts on a large forest block in the center of the subsection and other forest blocks near Doan’s Creek. IDNR also stated that wildlife crossings should be provided in these areas.

Response: Alternative 4A-2 is preferred. This should fully avoid a potential impact with an unconfirmed infant burial and minimize wetland impacts near CR 215E. Alternative 4A-2 is also preferred due to the probable residential displacement, greater forest impacts, major pond impact, and operation/access concerns for a large farm that will occur along Alternative 4A-1. The small springs located along Alternative 4A-2 are not viewed as an issue for highway development. A wildlife crossing will be considered in the area.

- **Comment:** IDNR stated that both Alternatives 4B-1 and 4B-2 had impacts to forest and that “Evidence needs to be presented that shows avoidance and minimization of the forest areas southwest of the Dowden Branch.”

- **Response:** *Alternative 4B-1 is preferred. This alignment is approximately 0.15 miles shorter in total length compared to Alternative 4B-2. Alternative 4B-2 would have greater forest (core and classified) impacts and has a probable residential displacement. The wetland along Alternative 4B-1 is located at the outer edge of the anticipated right-of-way and can be avoided by a minor alignment shift (50 to 100 feet), whereas the wetland along Alternative 4B-2 is located on the centerline.*

- **Comment:** IDNR stated that both alternatives in Subsection 4C will have impacts to a large amount of forestland. They further stated that Alternative 4C-1 is “generally recommended.” IDNR also stated that wildlife crossings should be provided in this area.

- **Response:** *Alternative 4C-2 is preferred. Alternative 4C-1 has slightly more potential impacts to core forest, prime farmland, managed properties, and some small springs as compared to Alternative 4C-2. It is located very close to or possibly within the 100-foot buffer around Taylor Ridge Cemetery. Overall, Alternative 4C-2 has less potential resource impacts; however, it does have a significant engineering issue where the alternative crosses the ‘T’ intersection of CR 475E and CR 450SS. Both of these roads are important for local travel, and a grade separation is recommended, which keeps both roads open. This*



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alternative is also located near the 100-foot buffer around Taylor Ridge Cemetery. Access to the cemetery could be impacted. A wildlife crossing will be considered in this area.

- **Comment:** IDNR states: “Forest dominates Subsection 4D and Alternatives 4D-1 and 4D-2 have similar forest impacts. Alternative 4D-1 is an acceptable alternative.”

Response: Alternative 4D-1 was recommended to be a component of the Preferred Alternative. This alignment is more compatible with the terrain, meaning the amount of earthwork required to construct the road should be less than other alternatives. Also, Alternative 4D-1 appears to have a lower potential to create large remnant parcels of land, and has a slight preference as related to potential effects upon karst features. The extensive wetlands within the Black Ankle Creek floodplain would be crossed by either alignment, and impact minimization will need to be considered for the further development of Alternative 4D-1.

Comment: IDNR states: “The proposed hybrid, Hybrid Alternative 4E-1 and 4E-2, is an acceptable modification of the three alternatives. The hybrid reduces to some degree the level of forest fragmentation because it is aligned closer to the edge of some already open and disturbed areas.”

Response: Hybrid Alternative 4E-1/4E-2 was recommended as a component of the Preferred Alternative. This alignment will follow Alternative 4E-1 from the west terminus to a point near the power-line corridor west of SR 45. Alternative 4E-1 is desirable in this area due to topography concerns, a sinking stream, and a large spring-fed pond located along Alternatives 4E-2 and 4E-3. Between the power-line corridor and SR 45, the preferred alignment will shift to Alternative 4E-2. Shifting to Alternative 4E-2 through this area will aid in reducing potential wetland impacts and residential displacements that will occur along Alternative 4E-1. From just east of SR 45, the alignment will continue along Alternative 4E-2 to the subsection terminus near SR 54. Minor shifts to the north closer to Alternative 4E-1 will be considered in order to avoid (or minimize) potential topography conflicts, karst features, residential displacements, and an access/operations concern for a large farm located between SR 45 and CR 1200E. The alignment will shift back to Alternative 4E-2 for the crossing of SR 54. This shift is supported by a local resident due to concerns about the crossing of a small stream just west of SR 54. The flexibility to follow Alternative 4E-1 and/or Alternative 4E-2 east of SR 45 will also reduce the potential for creating large remnant parcels of land. Hybrid Alternative 4E-1/4E-2 will be slightly longer in overall length than Alternative 4E-2; however, it is anticipated that the length of Hybrid Alternative 4E-1/4E-2 will still be shorter than the overall individual lengths of Alternative 4E-1 and Alternative 4E-3.

- **Comment:** IDNR concurred with the recommendation to select Alternative 4F-3 in this subsection because, “This alternative has lower impacts to forest and wetland...”

Response: Alternative 4F-3 was recommended to be a component of the Preferred Alternative.



- Comment: IDNR concurred with the recommendation to select *Alternative 4G-2* in this subsection.

Response: Alternative 4G-2 was recommended to be a component of the Preferred Alternative.

- Comment: IDNR stated that “Although forest impacts are the least with *Alternative 4H-2*, it has greater impacts to karst resources than the other alternatives.”

Response: Alternative 4H-1 was recommended to be a component of the Preferred Alternative because the other subsection alignments run across higher terrain and would impact a greater number of medium and high infiltration recharge facilities (primarily sinkholes).

October 22, 2009—IDNR-DHPA Additional Information Report for Section 4 Above-ground Resources Meeting: This meeting was held to update consulting parties on structures found that could potentially have integrity. Discussions involved the Fern Hills Club, the John May-Ada Wilson House (105-115-45062; no longer extant), Philip Murphy-Jonas May House (105-115-40051; no longer extant), two bridges within the APE that had been determined not eligible in the 2004 survey but were determined to be eligible in the Historic Bridge Inventory (both are far enough away so should not be affected), two homes that may be eligible (4625 East Lane in Bloomington and 6030 Koontz Road), Gilmore House (55049) and Hardscrabble cemetery (50047).

Meetings With Project Management Consultant

A number of meetings have been held between the Project Management Consultant (PMC) and various resource agencies. These meetings generally addressed issues of significance to multiple Tier 2 sections or the entire Evansville to Indianapolis project. A brief summary of each meeting is provided below. The detailed summary of each meeting is provided in **Appendix C, Agency Coordination Correspondence**.

IDNR-DHPA Meeting 4/29/04: The purpose of the meeting was to discuss the timing and the execution of one commitment in the Tier 1 Memorandum of Agreement (MOA): interim reports for Gibson, Pike, Daviess, Martin, Monroe, Morgan, Johnson, and Warrick counties and for the portion of Marion County that includes Decatur, Perry and Franklin townships. Timing of the Section 106 and countywide surveys was discussed. The DHPA will consider using GIS data from the project in their survey.

IDNR Meeting 5/27/04: The IDNR requested this meeting to let the PMC know that they want to provide input early. They have knowledge of potential mitigation property and offered assistance with land acquisition. The IDNR asked how road runoff would be handled in karst areas and shared concerns about indirect and cumulative impacts at interchanges. The PMC shared that Quantm will be used for route optimization, that Technical Coordination teams are being formed and that a Context Sensitive Design approach is being taken.

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IDNR-DHPA Consulting Party Meeting 7/12/04: The PMC explained the tiering process and that Tier 2 activities have begun. The Tier 1 MOA was reviewed. Dr. James Robertson provided an overview of the Section 106 process, defined the concept of the Area of Potential Effects (APE) and application of the National Register Criteria for Evaluation. Information was provided regarding timing of the upcoming architectural and aboveground historic resources survey. The role of consulting parties was discussed.

IDNR-DHPA Coordination Meeting 8/9/04: Topics discussed were protocols for communication, mapping, curation and collection, reporting, scoping and APE.

USFWS Coordination Meeting 1/27/05: Many things were addressed in this meeting including avoiding and minimizing impacts to Indiana bat maternity colonies. Key points of the BO were distributed and reviewed. The PMC distributed a summary of the bat mist netting surveys and reviewed the ongoing fall and winter cave surveys. The USFWS provided guidance regarding Section 7 consultation procedures for Tier 2 based on the Tier 1 BO and their experience in other consultations. The meeting highlighted the USFWS's procedures for review and approval of the Biological Assessments.

IDNR-DHPA Coordination Meeting 2/7/05: This meeting was held to discuss cemeteries, Virginia Iron Works (VIW) and quarries. The meeting discussed issues related to six Cemeteries of Concern (COC) in Section 5, the Phase Ia survey approach in the vicinity of VIW, and how to identify if quarries are considered archaeological or aboveground historic resources.

IDNR-DHPA Coordination Meeting 2/15/05: This meeting discussed proper formatting of Indiana Historic Sites and Structures Inventory (IHSSI) cards in Section 1, findings of Section 1's HPR, format of HPRs in general, addressing quarries within Sections 4 and 5 corridor and the eligibility of Pleasant View (Monroe 30055).

IDEM Office of Land Quality Meeting 2/18/05: Formal communication protocols were established. The Hazardous Materials methodology was discussed. The IDEM was also provided with the Tier 1 Report and Environmental atlas.

IDEM Groundwater Meeting 3/10/05: The purpose of this meeting was to obtain input from the IDEM Groundwater Section regarding appropriate information that should be collected and/or assessed by the Tier 2 EEACs. Wellhead Protection Areas, public water supplies and water supply recharge areas were discussed.

IDEM and USEPA Meeting on CERCLA Sites 3/21/05: This meeting was held to find out what information needs to be collected and assessed for the Bloomington area PCB sites in Section 5. Bennett Stone Quarry and the Lemon Lane Superfund sites were reviewed. Site hydrogeology and storm water management were discussed.

IDEM Water Resource Meeting 4/14/05: This meeting was held to discuss and receive clarification on IDEM's water resource comments provided for the I-69 Tier 2 (Evansville to Indianapolis) project in a letter dated 2/16/05. Their letter was in response to the 12/14/04 Interagency Water Resource Team Meeting.



IDNR Coordination Meeting 5/4/05: Floodway permits and flood easement questions were raised by IDNR. The crossing of the environmentally-sensitive Patoka River was brought up. There was a lengthy discussion of the tentative procedure for preparing hydraulic models.

IDNR-DHPA Section 4 Field Visit 5/19/05: A field visit west of the Virginia Iron Works area was done to examine ‘depression’ or ‘depression with rocks’ features. After the visit the recommendation was for CCRG to reassess their interpretation of other ‘depression’ features in their survey to determine if they could be natural karst features.

IDNR-DHPA Tier 1 Mitigation Meeting 5/25/05: The DHPA made several suggestions for implementation of specific provisions of the Tier 1 MOA. The DHPA requested that GIS be available before the first survey is done following the FEIS. Survey costs were discussed.

IDNR Division of Water Coordination Meeting 6/8/05: The meeting discussed discrepancies and ambiguities with hydraulic calculations and modeling within the corridor.

USFWS Coordination Meeting 7/1/05: This meeting was held to discuss a potential re-initiation of Section 7 formal consultation and additional bat mist netting. Other activities included a discussion of concerns over the Section 4 Greene/Monroe County Line interchange, review of proposed mitigation sites, updates on water resource impacts and assessments and review of state-listed species.

IDNR-DHPA and Other Consulting Parties Meeting 8/4/05: This meeting discussed the Section 4 NRHP eligibility findings presented in the Draft Historic Properties Report (HPR) and for consulting parties to provide comments on the Draft HRP. A question/answer session concluded the meeting.

USFWS Conference Call 8/12/05: The primary purpose of the meeting was to update the USFWS on the additional habitat surveys and the Tier 1 BA Addendum. Clarification was provided on “hibernacula” and whether to extend the Winter Action Area (WAA). The USFWS was provided with an update on the summer mist netting, radio telemetry and roost tree emergence counts. An area near the Patoka River Refuge was discussed for potential mitigation purposes. The USWFS previewed and commented on the draft BA Addendum outline.

USFWS Coordination 8/22/05: This meeting was held to discuss the fencing of a bridge where bats were found, potential mitigation site near Patoka River National Wildlife Refuge, Community Planning Grant Program, and USDA Forest Service Inventory Analysis Data. The numbers and locations of maternity colony circles were also reviewed.

USFWS Coordination 8/23/05: This meeting was held to discuss forest analysis methodology, indirect impacts methodology, and fencing under a bridge over the White River.

USFWS Coordination Meeting 9/12/05: The possibility of placing fencing under a bridge was the first topic. The USFWS was informed that guano sampling was completed at the utility pole. Mist netting and radio telemetry updates for the maternity colonies were discussed. Proposed methods for determining forest quality data were examined.

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USFWS Coordination Meeting 9/23/05: This meeting provided USFWS the fall harp trapping and guano DNA updates. Methodologies for forest impacts as well how indirect impacts are analyzed in the BA Addendum were discussed. Fencing under a bridge was also mentioned.

USFWS Conference Call 10/3/05: This meeting updated the USFWS on the fall harp trapping, legal drains within each of the maternity colonies and Indirect and Cumulative analysis. Methodology for estimating populations within maternity colonies was discussed, as well as revisions to the tree cover analysis. Winter Action Area (WAA) analysis was the last topic.

USFWS Conference Call 10/7/05: This meeting was held with the USFWS to discuss several topics. These included a discussion on the methodologies to estimate maternity colony numbers and “take” numbers, an update on harp trapping, development of the indirect and cumulative impacts analysis (including concerns over the proposed Section 4 Greene/Monroe County Line interchange), Winter Action Area analysis, and an update on the Indiana bat poster.

USFWS Conference Call 10/14/05: In this conference call, the USFWS defined Endangered Species Act (ESA) cumulative impacts. The USFWS was provided with guano DNA updates, harp trapping results, methodology for Winter Action Area (WAA) analysis and mitigation measures. The possibility of using “Environmental Clearance Buffers” and tolling were discussed.

USEPA Toll/Schedule Meeting 10/28/05: Major Moves and tolling were discussed and how it relates to the I-69 schedule.

IDNR Division of Fish and Wildlife 11/8/05: This meeting was held with the Division of Fish and Wildlife to discuss state-listed species of concern within each section, potential wildlife corridors, as well as permitting and mitigation.

USACE Toll/Schedule Meeting 11/10/05: A PowerPoint presentation was given updating Tier 2 Section 6 studies, alternatives and Purpose and Need. Question and answer sessions were part of the meeting as well.

IDNR DHPA Coordination Meeting 12/1/05: The purpose of the meeting was to discuss the cemeteries, I-69 schedule, Phase Ia management summaries and status of the Phase Ic and II work plans.

IDEM Toll/Scheduling Meeting 12/16/05: Major Moves and tolling were discussed and how it relates to the I-69 schedule.

IDNR Toll/Scheduling Meeting 12/16/05: Major Moves and tolling were discussed, with emphasis as to how each relates to the I-69 schedule.

USFWS Coordination Meeting 1/6/06: This meeting was held to discuss several topics. These included the status of the draft funding agreement between the INDOT and the USFWS to fund a full time equivalent (FTE) position at the Bloomington Field Office, proper terminology for the Tier 1 BA Addendum and the abstract for the Tier 1 BA Addendum (containing the natural history of the Indiana bat). Cave survey updates were also discussed as well as the status of the



fencing under a bridge, the Revised Tier 1 Forest and Wetland Mitigation and Enhancement Plan, the Pre-Consultation Agreement and areas in Sections 2 and 4 where medians might be widened. It was determined the revised BO will include the bald eagle and eastern fanshell mussel findings. The Eastern Greene County interchange was also discussed.

USACE Coordination Meeting 4/12/06: This meeting was held to discuss the current project schedule. A single contact person at INDOT for I-69 activities was identified. A discussion of USACE Section 404 permitting procedures resulted in the following *key* determinations: Each of the six sections will be permitted individually; Each section most likely will have one Individual Permit (IP) and multiple Regional General Permits (RGP); Permit extensions can be granted as long as permits have not expired; Plans at approximately 10%-30% design level are expected for permit applications; and Mitigation levels at 10% in excess of requirements are planned to compensate for potential impacts associated with minor shifts during final design.

Other discussions and decisions included: Mitigation and monitoring plans will be submitted with all permit applications; Individual sites may provide mitigation for impacts to multiple resources; Stream relocations should consider using Rosgen's methods; Mitigation in excess of requirements for I-69 may be applied to other INDOT projects; Open water impacts will be mitigated using ponds created from borrow pits; Stream mitigation will be provided within same eight-digit watershed as the impacts occur; Construction of riparian buffers will be included within the mitigation plans; Wetland mitigation will be provided within the same eight-digit watershed as impacts occur; And wetland mitigation ratios will be 4 to 1 or 3 to 1 for forested, 3 to 1 for scrub/shrub, 2 to 1 for emergent, and 1 to 1 for farmed.

IDNR Coordination Meeting 4/16/06: A general background was provided on the I-69 project. The IDNR supplied contact information for I-69. Permitting, mitigation sites, karst reports, oil/gas well impacts, revegetation species and wildlife crossings were all discussed.

IDEM Permitting Meeting 5/23/06: Several decisions were made during this meeting. These included: Rule 5 Permits will be completed during the final design; IDEM's review period is limited to 120 days for Section 401 permit applications; and isolated wetlands should be clearly distinguished from jurisdictional wetlands in permit applications.

IDNR Coordination Meeting 5/23/06: The purpose of this meeting was to discuss how the Tier 1 ROD and Tier 2 studies could be revised if tolling is an option. The meeting also discussed Construction in a Floodway permitting, mitigation sites and additional cave studies in Section 4.

USEPA Reevaluation Coordination Meeting 7/7/06: The purpose of this meeting was to discuss how the Tier 1 ROD and Tier 2 studies could be revised if tolling is an option.

USFWS Reevaluation Coordination Meeting 7/17/06: In this meeting, it was discussed how the Tier 1 ROD and Tier 2 studies could be revised if tolling is an option. An update on the Tier 1 BA Addendum and BO was also provided, including hibernacula, Patoka River crossing and the Greene/Monroe County Line interchange.

IDNR Division of Forestry Coordination Meeting 9/11/06: This meeting discussed the IDNR's concerns with impacts to urban forest resources and mitigation options. The meeting

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also discussed controlling exotic plant species. The IDNR explained what urban forests are and where potential impacts may be found within Sections 5 and 6. Possible mitigation of this type of impact was discussed. The IDNR provided a contact (Bloomington Urban Forester) for the PMC to consult. If encountered, the IDNR would like invasive species eradicated within the right-of-way. The IDNR does not want any logged trees to be transported to other areas (in an effort to prevent the spread of Emerald Ash Borer).

IDNR-DHPA and Other Consulting Parties Meeting 10/4/06: This meeting discussed finalizing discussions of eligibility and the preliminary Identification of Effects Report. A PowerPoint presentation was given on the expanded Area of Potential Effects (APE) near the Greene/Monroe County Line interchange and the historic resources within (both aboveground and archaeology). A question/answer session concluded the meeting. Two owners of eligible historic properties were in attendance.

USFWS Conference Call Meeting 1/10/07: This meeting discussed the potential 50 sites for mist netting in Sections 1 through 6.

IDNR Division of Water and Division of Fish and Wildlife Conference Call 1/17/07: This meeting was held with the Division of Water and the Division of Fish and Wildlife. The principal topic was to determine the level of stream relocation which requires a Construction in a Floodway Permit. The determination was made that *any* level of relocation will require such a permit.

USFWS Coordination Meeting 3/15/07: Several topics were discussed in this meeting held at the Bloomington Field Office. These included the status of the USFWS reviewer agreement, bridge signage and monitoring, developing and reviewing plan and profile for bridges in Section 2, and Tier 2 BA formats. Other topics included forest plot data, Indiana bat poster, I-69 planning grants, annual report formats and time lines, Section 4 Cave Biota report, and mitigation properties. The format for discussing indirect impacts for Section 1's DEIS was also discussed. The USFWS recommended coordination with the IDNR regarding a coal mining project in Southwest Indiana.

USFWS Conference Call Meeting 3/19/07: The purpose of this meeting was to address some issues brought up during the 3/15/07 meeting about the coal mining project and Section 1's DEIS discussion of indirect impacts. The USFWS wants impacts south of I-64 analyzed because two new maternity colonies are located here. As such, the USFWS indicated the Tier 1 BO will have to be amended to include traffic analysis zones (TAZ).

IDNR Coordination Meeting 4/16/07: This meeting was held to discuss multiple resource issues related to Tier 2 EISs as well as permitting and mitigation. The meeting included a review of the IDNR comments on the Section 1 DEIS and project coordination points. Specific discussion focused on mitigation commitments compared to IDNR permit requirements and wildlife crossings. Other topics included karst resources, revegetation, and mineral resources.

IDEM and USEPA Greene County Non-conformity Meeting 6/14/07: This meeting was held to discuss the draft Greene County Ozone Conformity document. The IDEM and USEPA



indicated they would like to see more data in the document. It was also decided that a PM 2.5 hotspot analysis for Sections 1 and 2 EIS's would not be required because the project falls outside the County and Township Non-Attainment areas.

USEPA Karst Review Meeting 6/26 and 6/27/07: This meeting was held to discuss several items related to karst studies conducted for Sections 4 and 5. These included: project area description, study methodology and study results. Several karst feature locations were also visited in the field for both sections, allowing time for question/answer sessions.

USFWS Coordination Meeting 8/6/07: This meeting was held to discuss mitigation efforts in Sections 1, 2, and 3 and cumulative forest impacts in Section 1. Questions about the Tier 2 Biological Assessment (BA) for Section 1 also were addressed.

USFWS Mitigation Field Review 11/8/07: This field review was held to review the proposed mitigation site for Section 3, which is identified to encompass all water resources and forest mitigation requirements. Field conditions were observed and issues related to the development of this site were discussed, including preservation of existing habitat and Indiana bat maternity roost trees within the sites.

USFWS Meeting 12/5/07: This meeting was held to address revised formatting and information to be included in subsequent Tier 2 BAs, including forest impact details, mitigation planning and details and indirect impacts.

USACE Meeting 1/25/08: This meeting was held to review current permit application status and address the permitting approach. The meeting also reviewed mitigation efforts, including potential identified sites to be reviewed and issues related to the development of these sites.

USACE and IDNR Mitigation Field Review 4/22/08: This field review was held to review the currently proposed mitigation sites for Sections 2 and 3. Field conditions were observed and issues related to the development of these sites were discussed, including association of water resources and other mitigation elements within the sites (bottomland forest, upland forest and/or forest preservation).

USFWS Meeting 7/9/08: This meeting was held to discuss several topics related to the I-69 highway project. These included the status of a bridge monitoring, use of “bat friendly” bridges, protocol for the four approved Section 1 mist netting sites, mitigation sites in Sections 1 through 4, and use of gates versus fencing at caves. Other topics discussed were: presenting sensitive information in the BAs, Biological Opinions (BOs) and EISs, White-Nose Syndrome, validity of the 2004 and 2005 mist netting data, and concerns over the Greene/Monroe County Line interchange. Lastly, obtaining a Bald and Golden Eagle Act Permit, Indiana bat poster, 2007 Annual Report, construction notice phone numbers, and the status of the I-69 reviewer were discussed.

USEPA Mitigation Field Review 8/18/08: This field review was held to review the proposed mitigation sites for Sections 2 and 3 which are identified for advanced construction. Field

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conditions were observed, and issues related to the development of these sites were discussed, including association of water resources and other mitigation elements within the sites.

USFWS Meeting 1/12/09: This meeting was held to address a number of items related to Section 7 consultation and the Tier 2 Biological Assessments. These included the project schedule, USFWS reviewer change, bridge survey, pre-construction mist netting efforts, mitigation status, bald eagle permitting status, cave protection, and other conservation measures, including the awareness training video.

IDNR Division of Fish and Wildlife Meeting 2/12/09: This meeting was held to discuss IDNR concerns related to potential box turtle impacts associated with I-69. The meeting identified a number of biological factors that increase the potential for impact to this species, and also noted the special legal status of the box turtle relative to state statutes which prohibit collection. The discussion included factors which should be considered in identifying habitat criteria within the I-69 right-of-way that have a higher probability of box turtle occurrences. Existing measures which have been incorporated into the project to address wildlife impacts as well as additional potential measures to help minimize harm to box turtles were also discussed.

IDNR-DHPA Parties Meeting 3/25/09: This meeting discussed the methodology for the proposed Age of Data Survey for Section 4.

IDNR Division of Fish and Wildlife/Division of Nature Preserves/Division of Forestry Meeting 5/20/09: This meeting was held to discuss IDNR concerns related to potential box turtle impacts associated with I-69, as well as overall I-69 mitigation planning efforts. The meeting identified areas of interest related to potential additional box turtle measures and discussed the protocol that may be used for follow up surveys. Mitigation sites currently identified by INDOT for I-69 were also reviewed and the potential for IDNR long-term management was discussed.

IDNR Meeting 8/10/09: This meeting was held to discuss potential IDNR management of mitigation sites for I-69, as well as general coordination on I-69 mitigation planning efforts. The meeting identified areas of interest for IDNR management. Two mitigation sites were identified by INDOT as having potential for IDNR long-term management.

USFWS Meeting 12/07/09: This meeting was held to address a number of items related to Section 7 consultation and the Section 2 Tier 2 Biological Assessment/Biological Opinion. These included the project schedule, new INDOT management assignments, pre-construction mist netting efforts, conservation measures and mitigation status.

IDNR-DHPA and Other Consulting Parties Meeting 12/17/09: This meeting updated consulting parties about the results of the Additional Information study, updates to the 2006 Historic Properties Report and the 2007 Determination of Effects Report for Section 4. Changes to the alternatives were also presented. A PowerPoint presentation was also given. During the presentation, many question/answer opportunities were provided.

USFWS Sections 2 and 3 Pre/Post-Construction Mist Netting and Section 4 Mitigation Meeting 2/23/10: This meeting was held to discuss and confirm bat mist netting sites in Sections



2 and 3 and to discuss the use of AnaBat. Ten mist netting sites were recommended in Section 2 and eight mist netting sites were recommended by the USFWS in Section 3. The USFWS encouraged the use of AnaBat but said it is not required. The USFWS was also provided with a summary of Section 4 proposed mitigation sites.

IDNR Division of Fish and Wildlife Sections 2 and 4 Box Turtle Surveys and Section 4 Wildlife Crossings Meeting 4/6/10: In this meeting, the IDNR was provided with a PowerPoint Presentation summarizing the proposed Section 4 wildlife crossings. A discussion was held afterwards on the proposed eastern box turtle surveys in Sections 2 and 4. A protocol was discussed for conducting the eastern box turtle surveys.

USFWS Coordination Meeting 5/17/10: In this meeting, summer 2010 mist netting was discussed for the 22 sites Sections 1-3. Updates on the Karst Report and Sections 2 and 4 mitigation properties were presented and discussed. Indirect and cumulative impacts associated with the Greene/Monroe County Line interchange were discussed. Other topics discussed included Conservation Easement Deed restrictions.

IDNR Division of Fish and Wildlife Coordination Meeting 5/21/10: This meeting was held to discuss updates since the 4/6/10 meeting. Methodologies for conducting the eastern box turtle surveys were further discussed. Wildlife crossing recommendations for Section 4 were also further examined.

USACE, EPA, USFWS, IDEM, IDNR Mitigation Site Field Review 6/22/10-6/24/10: This field review was held to show the resource agencies the proposed mitigation sites that have been identified in Section 4 and discuss the proposed concepts for these sites.

IDNR-DHPA Meeting 9/22/10: This meeting was held to discuss the Virginia Ironworks and Limestone Quarry archaeological areas. The IDNR-DHPA offered information on how to evaluate these archaeological areas, adverse effects, and mitigation.

USFWS Meeting 11/10/10: The Section 4 Biological Assessment (BA) submitted on November 1, 2010 was discussed. It discussed the adequacy of the Section 4 BA and addressed preliminary questions regarding the BA.

IDNR-DHPA Meeting 11/17/10: This meeting was held to discuss the Virginia Ironworks and limestone related archaeological sites. The results of additional archaeological studies and research were presented and discussed with the IDNR-DHPA. Both the Virginia Ironworks and Limestone Quarry areas were recommended as eligible discontinuous archaeological districts. The project will impact a contributing site in each district and have an Adverse Effect on each district.

USFWS Mitigation Site Easement Language Meeting 11/22/2010: This meeting was held in Bloomington to discuss the Conservation Easement Language for upland forest mitigation sites.

IDEM Erosion Control Meeting 3/21/11: This meeting was held in Indianapolis to discuss the Rule 5 Erosion Control issues that IDEM is identifying in the current construction areas of I-69

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and discussions were also held on how to move forward in the hilly terrain in Section 4 and how to best control erosion in this area.

USACE and IDEM Mitigation Meeting 3/23/11: This meeting was held in Indianapolis to discuss the proposed stream mitigation concepts that are currently being proposed for Section 4 stream mitigation along with a discussion of the permitting for Section 4.

Other Coordination

Throughout the development of the Tier 2 environmental documents for all six sections of I-69, there has been ongoing coordination with the USEPA on the subject of cumulative impacts and the tracking of impacts across all six Tier 2 sections. Since the Section 1 EIS was the first to be processed, many of the key issues were raised in the specific context of that document, but it was recognized, and requested by USEPA, that these issues be addressed in the EIS documents for each of the subsequent sections. The following paragraphs briefly summarize the coordination on that issue. *The actual correspondence is included in its entirety in Appendix C.*

USFWS Comment Letter of 12/10/04 on Sections 4 and 5 Winter Cave Surveys for the Indiana bat: The USFWS granted authorization to BHE Environmental, Inc. (BHE) and Environmental Solutions & Innovation (ESI) to conduct winter surveys in 60 caves for the Indiana bat. Permission was granted to those listed on BHE and ESI's federal permits.

Weintraut & Associates Letter of 8/1/05 on Eligibility of Scotland Commercial District: This letter was sent to the IDNR State Historic Preservation Officer (SHPO) stating that since submittal of Section 3's HPR, the Scotland Commercial District is not considered eligible for listing in the NRHP.

IDNR-DHPA Comment Letter of 8/15/05 on Eligibility of Scotland Commercial District: This letter was subsequently provided stating that the SHPO agrees that the Scotland Commercial District is not eligible for listing in the NRHP.

IDNR-DHPA Comment Letter of 10/14/05 on Draft Historic Property Report (HPR): The SHPO sent a letter stating general agreement with the recommendations of the eligibility in the Draft HPR.

IDNR-DHPA Comment Letter of 12/15/05 on Three Bridges: The SHPO sent a letter in response to information provided, indicating that three bridges (Greene County Bridges No. 35 and No. 311 and Monroe County Bridge No. 83) within the APE are not eligible for listing in the NRHP.

IDNR-DHPA Comment Letter of 12/16/05 on Section 4 Draft Purpose and Need (P&N) Statement and Preliminary Alternatives: This letter stated the IDNR did not have any particular comments on the Draft P&N for Section 4. The IDNR did comment on aboveground resources within the Section 4 Preliminary Alternatives.



Weintraut & Associates Letter of 12/28/05 on Section 4 Area of Potential Effect (APE) Revision: This letter was sent to the IDNR SHPO describing and showing the revised APE for Section 4 around County Line Road.

IDNR-DHPA Comment Letter of 1/6/06 on Report on the Determination of Ineligibility of the Dowden Farm for Listing in the National Register of Historic Places: The DHPA sent a letter concurring with the overall conclusions on the Report on the Determination of Ineligibility of the Dowden Farm for Listing in the NRHP.

USDA Comment Letter of 1/13/06 on Section 4 Draft P&N Statement and Preliminary Alternatives: The USDA stated the Draft P&N was consistent with the Tier 1 Final Environmental Impact Statement (FEIS) and the Preliminary Alternatives seem adequate.

USEPA Comment Letter of 2/13/06 on Section 1 Preliminary Alternatives Analysis and Screening Package: This comment letter was subsequently provided to the study teams for each of the other sections. USEPA's comments relating to all Tier 2 sections included one comment involving tolling options; two concerning direct, indirect/secondary, and cumulative impacts; and one involving the application of their Section 1-specific comments to all sections. On May 19, 2006, FHWA responded by letter to these USEPA comments.

IDNR Division of Fish and Wildlife Comment Letter of 2/17/06 on Section 4 Draft P&N Statement and Preliminary Alternatives: In this letter, the IDNR commented on impacts associated with forest, stream, wetland, riparian, noise, light, and karst. The IDNR also commented on wildlife connectivity.

USEPA Comment Email of 2/17/06 on Section 4 Draft P&N Agency Meeting/Webcast: This email was provided by the USEPA commenting on the draft 12/19/05 meeting minutes for the Section 4 P&N Package.

Keeper of the National Register Letter of 3/20/06: The Keeper of the NRHP concurred with the conclusion of the Report on the Determination of Ineligibility of the Dowden Farm for Listing in the NRHP.

IDNR-DHPA Comment Letter of 3/31/06 on Report on APE Second Revision: The DHPA sent a letter regarding the APE Second Revision at County Line Interchange, saying that it "appears to reasonably encompass the area."

IDNR-DHPA Comment Letter of 5/8/06 on the Archaeological Records Review: The DHPA sent a letter regarding the archaeological records review in which the office asked for "clarifications and questions...to be addressed."

IDNR-DHPA Comment Letter of 7/31/06 in response to Information on Properties within County Line Interchange APE: The DHPA sent a letter concurring with a preliminary determination that there are no properties within the expanded APE that are eligible for inclusion in the NRHP.

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FHWA and INDOT Memorandum of 8/1/06 to All Resource Agencies on Proposed Cumulative Impact Analysis for I-69 Studies in Tier 2 EISs: At a coordination meeting with all of the resource agencies, FHWA/INDOT presented this memorandum to summarize their proposed methodology for analyzing cumulative impacts. The memorandum summarized the prior guidance and presented an outline of the basic methodology to be used to determine cumulative impacts for each of the Tier 2 sections.

IDNR Division of Fish and Wildlife Email Response to Section 4 Karst Report of 8/11/06: This email commented on the Section 4 Karst Report. The IDNR made several recommendations including: overlaying the alternatives over karst features, following Best Management Practices (BMPs), following the Memorandum of Understanding (MOU), avoiding karst features and impacts to the Indiana bat, and doing additional dye tracing.

USEPA Response of 8/31/06 on FHWA and INDOT Memorandum: On August 31, 2006, USEPA wrote in response to the FHWA/INDOT memorandum to ask that all six sections include a “detailed cumulative impact analysis for the three significant resources of concern (i.e. farmland, forest, and wetland) that underwent cumulative impacts analysis in the Tier 1 EIS. In addition, all six Sections should include detailed cumulative impact analysis for streams.” The USEPA also requested “that the project-wide totals of both the direct and indirect impacts from all I-69 impacted resources of concern be included in each Tier 2 FEIS.” Further, it suggested that each Section’s cumulative impact analysis “will most likely need to consider the impacts of the adjacent Sections.”

USDA Comment Letter of 9/20/06 on the Section 4 Preliminary Alternatives Analysis and Screening Package: The USDA stated they did not have any concerns with the Preliminary Alternatives Analysis and Screening package.

USEPA Comment Letter of 9/26/06 on the Section 4 Preliminary Alternatives Analysis and Screening Package: In this letter, the USEPA made several comments related to the alignment of the subsections. Comments also included providing a detailed performance analysis for the alternatives, revising how the analysis tables are presented, presenting interchange impacts, explaining the criteria used to determine if an interchange is necessary, identifying if any NRCS lands associated with a conservation program are being considered Section 4(f) properties, and providing a “Resource Agency Input” section in the Tier 2 EISs.

IDNR Comment Letter of 9/28/06 on the Section 4 Preliminary Alternatives Analysis and Screening Package: In this letter, the IDNR commented on each of the subsections and associated impacts, asked for a map showing karst features overlaid with the alternatives, commented on forest/stream/floodplain/wetland mitigation, recommended areas suitable for wildlife crossings, discussed wildlife crossing criteria, iterated following the karst MOU, and avoiding impacts to the Indiana bat.

IDNR-DHPA Comment Letter of 10/17/06 on the Findings and Determination of APE and Eligibility: The DHPA sent a letter concurring with FHWA’s findings and determination of APE and eligibility. The SHPO did not object to the determinations presented in the Final HPR. The



SHPO requested that the Draft Identification of Effects Report's recommended findings of effect be revised in light of consulting party comments prior to issuance of formal determinations of effect.

IDNR-DHPA Comment Letter of 10/30/06 on the Findings and Determination of APE and Eligibility: The DHPA sent a letter clarifying its opinion (stated in its 10/17/06 letter referenced above) that the undertaking will not demonstrably diminish the integrity of the NRHP-listed Scotland Hotel or the NRHP-eligible Blackmore Store, located in Greene County.

USFWS Comment Letter of 12/7/06 on the Draft Karst Reports for Sections 4 and 5: In this letter, the USFWS made several general and specific comments related to the Draft Karst Reports for Sections 4 and 5. Most of these were related to the formatting and organization of the reports. The USFWS asked what additional studies would be conducted on certain caves that are hydraulically connected to the Section 4 corridor and expressed concern over the protection of a specific cave. The USFWS concurred with both reports' recommendations for additional studies and the BMPs outlined.

PMC Memo of 1/8/07 on Cumulative Impacts to All Tier 2 EEACs: In response to the USEPA letter of August 31, 2007, the PMC provided further guidance to all six Tier 2 EEACs for their cumulative impact analysis. The memo stated that the methodology will be uniform for each resource across all six sections, and will follow the 11-step process outlined in the Council on Environmental Quality's "*Considering Cumulative Effects under the National Environmental Policy Act*" dated January 1997, as referenced in USEPA's "*Consideration of Cumulative Impacts in EPA Review of NEPA Documents*," dated May 1999.

IDEM Comment Email of 1/16/07 on the Draft Karst Reports for Sections 4 and 5: In this email, the IDEM asked if any studies will be conducted to determine the effects of increased volumes and velocities of run-off water on karst systems, recommended four additional springs be added to the figures, and asked what criteria was used to determine hydraulically connectivity of quarries to the corridor in Section 5.

USEPA Comment Letter of 2/20/07 on Section 1 DEIS: In commenting on the Section 1 DEIS document, USEPA noted that "many of their comments may also apply to the I-69 Tier 2 EISs for Sections 2, 3, 4, 5 and 6. We recommend you consider our comments and incorporate our recommendations, as appropriate, when developing the Tier DEISs for those sections."

IDNR-DHPA Comment Letter of 3/5/07 on a Consulting Party Objection to the Determination of Ineligibility of the Dowden Farm: The DHPA sent a letter reiterating that "we still do not believe that the property (Dowden Farm) is eligible for inclusion in the National Register of Historic Places."

USEPA Comment Letter of 8/3/07 on the Draft Karst Reports for Sections 4 and 5: In this letter, the USEPA asked for additional information and clarification concerning the methodologies used for karst feature identification. The USEPA recommended additional karst

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studies be performed and to include those results in the karst reports (including two superfund sites). Additional measures to reduce karst impacts were also presented in this letter.

Section 1 FEIS Response to USEPA Comments, FEIS approved 10/17/07: FHWA does not believe that a “tally” of direct and indirect impacts is required by NEPA in the Tier 2 EISs for the entire I-69 Evansville to Indianapolis project as approved in Tier 1. Nonetheless, FHWA and INDOT have agreed to provide a tally of direct impacts in each section’s Tier 2 FEIS, for informational purposes only. Also, as recommended by USEPA, an overall I-69 direct impacts/permitting/mitigation tracking method is being developed in consultation with permitting agencies and USEPA.

IDNR DHPA Comment Letter of 11/28/07 on Identification of Effects Report in Section 4: In this letter, the IDNR concurred the only adverse effect to aboveground properties will be to the Stipp-Bender Farmstead if Interchange Option 2 is chosen. The IDNR also noted they will comment on the archaeological investigations in Section 4 once they receive such information.

USACE, IDEM, IDNR, USEPA and USFWS Transmittal Letter of 2/4/08: This transmittal included a draft version of the proposed I-69 Mitigation Tracking System for all mitigation sites for agency review and feedback.

USFWS Comment Letter of 2/15/08 – This letter included notification of revision of the Indiana bat tree clearing restriction dates for the Indiana bat Summer Action Area (SAA) under the standard Section 7 Consultation condition to April 1 through September 30 (in lieu of April 15 through September 15).

As a result of this coordination, INDOT and FHWA have committed to tracking direct impacts to key resources across all six Tier 2 sections, and to presenting that tally within each section’s FEIS document. They have also agreed to analyze in detail four key resources – farmland, forests, wetlands, and streams – within the cumulative impacts analysis of each section. For Section 4, that analysis is presented in Section 5.24 of this document, *Indirect and Cumulative Impacts*.

USEPA Comment Letter of 6/27/08 on the Draft Karst Reports for Sections 4 and 5: In this letter, the USEPA agreed that, for the most part, the INDOT and FHWA have committed to using acceptable engineering methods/measures to mitigate for karst resource impacts in Sections 4 and 5. The USEPA stated the Sections 4 and 5 EISs should describe these methods/measures in detail and provide a comparative analysis of the adequacy of each. The letter expressed concern over potential impacts from construction/operation of the highway on two superfund sites (Lemon Lane Landfill and Bennett’s Dump).

IDNR-DHPA Comment Email of 8/11/08 on Section 4 HPR: The IDNR inquired why it had received the 8/29/06 Section 4 HPR after they had already provided comments on the report. The IDNR was subsequently notified that no changes had been made to the report and the IDNR was to keep the HPR for their records.



IDNR-DHPA Comment Letter of 8/7/09 on Sections 3 and 4 Consulting Party Comments on the Dowden Farm: The DHPA sent a letter agreeing with PMC responses from June 2009 to the consulting party comment on the Dowden Farm. The DHPA stated, “We continue to hold the opinion that the Dowden Farm is not eligible for inclusion in the National Register of Historic Places.”

IDNR-DHPA Comment Letter of 1/15/10 on the Additional Information (AI) Report: The DHPA sent a letter concurring with the recommendations of eligibility contained in the AI Report, as well as the analysis of effects upon historic properties presented at the fourth consulting party meeting.

IDNR-DHPA Comment Letter of 7/13/10 on Responses to Consulting Party Comments Received Following the AI Report: The DHPA sent a letter responding to a letter regarding consulting party comments received following publication of the AI Report. In the letter, the SHPO stated that they were generally satisfied that surveys in 2004-2005 and 2009 were conducted in accordance with established methodology for I-69 surveys.

IDNR-DHPA Comment Letter of 8/30/10 on the Adverse Effect Finding, the 800.11(e) documentation, and the Draft Phase Ia Archaeological Investigations Report: The DHPA sent a letter concurring with the Adverse Effect finding for the project and the No Adverse Effect finding on Scotland Hotel, Blackmore Store, Clifty Church, Koontz House, Stipp-Bender Farmstead, Harris Ford Bridge, Greene County Bridge No. 311, and Monroe County Bridge No. 83. The DHPA requested more information on archaeological investigations.

IDNR-DHPA Comment Letter of 10/26/10 on the DEIS: The DHPA sent a letter agreeing with the findings relating to aboveground historic resources. Regarding archeology, the DHPA issued some questions and comments on Sections 4.4.3.1 and 4.4.3.2. DHPA questioned if a summary of all investigations to date should be included in the EIS and if the possibility of a VIW multiple property listing, cultural landscape, or discontinuous district should be mentioned.

FHWA Letter of 11/1/10 to USFWS on the Section 4 Biological Assessment (BA): FHWA transmitted a BA for the Section 4 project to USFWS.

IDNR-DHPA Comment Letter of 11/5/10 on the Draft Addendum 1 Archaeology Report: The DHPA sent a letter commenting on the Draft Addendum 1 Archaeology Report, concurring in part and recommending additional investigations or research in some areas.

USFWS Letter of 11/23/10 to FHWA on the Section 4 Biological Assessment (BA): USFWS acknowledged receipt of the Section 4 BA, and found it to be adequate.

IDNR-DHPA Comment Letter of 12/2/10 on the Draft Addendum 2 Archaeology Report: The DHPA sent a letter agreeing that there were no currently known archaeological resources in the research area.

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IDNR-DHPA Comment Letter of 12/16/10 on the Memorandum Regarding Aboveground Survey and Investigation of the VIW Sites, Revised Archaeology Reports, and the Draft VIW and Limestone Quarry Context Study: The DHPA sent a letter responding to the memorandum regarding aboveground survey and investigation of the VIW sites; the revised Phase Ia Archaeological Investigations Report; Revised Addendum 1 to the Phase Ia Archaeological Investigations Report; and the Draft VIW and Limestone Quarry Context Study. The DHPA agreed with the conclusions regarding aboveground resources and the discontinuous districts recommended in the draft context study. The DHPA stated there was insufficient information regarding Maryland Ridge as a potential archaeological district and regarding certain sites in the VIW or Limestone area.

IDNR Comment Letter of 12/29/10 on Maryland Ridge: The IDNR sent a letter concurring with the conclusion that a Maryland Ridge archaeological district does not appear to be supported and that Site 12Mo1343 is Non-Contributing to the Victor Limestone District.

IDNR-DHPA Comment Letter of 2/15/11 on the Section 106 Findings and Determinations: The DHPA sent a letter concurring with the Adverse Effect finding for the undertaking and agreed with the previously-identified historic properties and with the archaeological districts identified in the report. The DHPA further offered comments on the MOA.

IDNR-DHPA Comment Letter of 3/3/11 on the Addendum 3 Archaeology Report: The DHPA sent a letter responding to the Addendum 3 report and stated that archaeological site 12Gr1868 is outside the project area and must be avoided by all project activities or subjected to further investigations.

IDNR Letter of 3/3/11 on the Draft Comment/Response Document: Comments were provided by IDNR on the draft responses to comments on the DEIS. Consideration of these additional comments is included in Volume III, Part A of this FEIS. The IDNR letter is included in Volume III, Part B.

USEPA Letter of 3/8/11 on the Draft Comment/Response Document: Comments were provided by USEPA on the draft responses to comments on the DEIS. Consideration of these additional comments is included in Volume III, Part A of this FEIS. The USEPA letter is included in Volume III, Part B.

IDEM Letter of 3/23/11 on the Draft Comment/Response Document: Comments were provided by IDEM on the draft responses to comments on the DEIS. Consideration of these additional comments is included in Volume III, Part A of this FEIS. The IDEM letter is included in Volume III, Part B.

Advisory Council on Historic Preservation (ACHP) Letter Comment Letter of 3/25/11 on I-69 Section 4 Section 106 Consultation: The ACHP notified FHWA that it concurred with its findings and that it “has concluded that our participation in consultation for this undertaking is not warranted.”



FHWA Letter of 4/11/11 to USFWS regarding Tier 1 Formal Consultation: FHWA requested that USFWS re-initiate formal consultation on the Tier 1 project. This request was due to new information regarding a newly-identified maternity colony in Section 4 and the appearance of White Nose Syndrome within the Indiana bat Midwest Recovery Unit (as well as Indiana hibernacula).

USFWS Letter of 4/12/11 to FHWA regarding Tier 1 Formal Consultation: USFWS responded to the FHWA letter of April 11, 2011, stating that it will reevaluate and amend the Tier 1 Revised Programmatic Biological Opinion dated August 24, 2006.

Table 11-4, following, summarizes the resource agency coordination meetings held that were relevant to Section 4.

Table 11-4: Tier 2 Coordination Meetings With Resource Agencies		
Date & Activity	Attendees (In addition to FHWA and INDOT)	Purpose
4-29-04 Coordination Meeting	<ul style="list-style-type: none"> DHPA 	<ul style="list-style-type: none"> Discuss Tier 1 MOA commitment for interim reports Timing of Section 106 surveys was discussed.
5-27-04 Coordination Meeting	<ul style="list-style-type: none"> IDNR 	<ul style="list-style-type: none"> IDNR requested meeting in order to provide early input Discuss road runoff in karst areas Explain the use of Quantm for route optimization
7-12-04 Consulting Party Meeting	<ul style="list-style-type: none"> DHPA 	<ul style="list-style-type: none"> Explain tiering process Provide overview of Section 106 process
8-9-04 Coordination Meeting	<ul style="list-style-type: none"> DHPA 	<ul style="list-style-type: none"> Discuss protocols for Section 106 process
8-12-04 Interagency Scoping Meeting—All Sections	<ul style="list-style-type: none"> IDNR, Division of Fish and Wildlife, Division of Nature Preserves, and Division of Historic Preservation and Archaeology Indiana Department of Commerce Evansville MPO Indiana Geological Survey USACE USFWS IDEM, 401 Water Quality Control, and Wetlands Bloomington MPO Indianapolis MPO USEPA Region 5 Crane NSWC USDA, Forest Service 	<p>1st Tier 2 meeting with agencies and all sections to:</p> <ul style="list-style-type: none"> Familiarize environmental review agencies with scope and status of Tier 2 environmental survey activities Introduce Project Management Team, agency representatives, and section consultants Acquaint agency representatives with Tier 2 project corridor, overall project Purpose and Need, public involvement efforts, and project schedules



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Date & Activity	Attendees (In addition to FHWA and INDOT)	Purpose
12-14-04 Interagency Water Resource Coordination Team Meeting	<ul style="list-style-type: none"> • IDEM • USFWS • USEPA Region 5 • USACE • IDNR 	<ul style="list-style-type: none"> • PMC will be agencies main point of contact • Some sections have varying methodologies because of different environmental settings and types of impacts • Indiana bat study update • Information on Quantm • Information on methodology being used for wetland and stream analysis
1-27-05 Coordination Meeting	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Discuss avoiding and minimizing impacts to Indiana Bat maternity colonies • Provide guidance on Section 7 consultation process
2-7-05 Coordination Meeting	<ul style="list-style-type: none"> • IDNR 	<ul style="list-style-type: none"> • Discussed cemeteries in Section 5, Virginia Iron Works and quarries
2-15-05 Coordination Meeting	<ul style="list-style-type: none"> • IDNR 	<ul style="list-style-type: none"> • Discussed formatting of Section 1's IHSSI cards, HPR, quarries in Sections 4 and 5 and eligibility of Pleasant View
2-18-05 Coordination Meeting	<ul style="list-style-type: none"> • IDEM 	<ul style="list-style-type: none"> • Discuss formal communication protocols
2-23-05 & 2-24-05 Interagency Coordination Meeting and Field Review—All Sections	<ul style="list-style-type: none"> • IDNR Divisions of Fish and Wildlife, Water, Forestry, Soil Conservation, and Historic Preservation and Archaeology • Indiana Geological Survey • USFWS • IDEM, Air Quality and 401 Water Quality Control • USEPA Region 5 • USDA, Hoosier National Forest and NRCS 	<p>2nd Tier 2 meeting with agencies and all sections:</p> <p><u>First day:</u></p> <ul style="list-style-type: none"> • Explain steps in Tier 2 formal agency coordination process • Identify project schedules and timeframes • Explain how local needs and goals will be identified and incorporated into Purpose and Need Statements of each section • Discuss how Preliminary Alternatives will be developed and evaluated • Breakout sessions for interagency karst and water resource meetings. <p><u>Second day:</u></p> <ul style="list-style-type: none"> • Field trip to see sensitive sites in Sections 1, 2, and 3
3-10-05 Groundwater Meeting	<ul style="list-style-type: none"> • IDEM 	<ul style="list-style-type: none"> • Obtain input regarding information to be collected during study • Discuss Wellhead Protection Areas, public water supplies, and water supply recharge areas
3-21-05 CERCLA Sites Meeting	<ul style="list-style-type: none"> • IDEM • USEPA Region 5 	<ul style="list-style-type: none"> • Discuss information to be collected for Bloomington PCB sites
3-22-05 Wetland and Stream Field Review Meeting	<ul style="list-style-type: none"> • IDEM • USACE 	<ul style="list-style-type: none"> • Establish a consistent approach for water resources in all six sections
4-14-05 Water Resource Meeting	<ul style="list-style-type: none"> • IDEM 	<ul style="list-style-type: none"> • Discuss and receive clarification on IDEM's water resource comments provided for the I-69 Tier 2 project in a letter dated 2/16/05 • The letter was in response to the 12/14/04 Interagency Water Resource Team Meeting
5-4-05 Coordination Meeting	<ul style="list-style-type: none"> • IDNR 	<ul style="list-style-type: none"> • Answer questions regarding floodway permits and floodway easements • Discuss procedure for hydraulic model
5-19-05 Section 4 Field Visit	<ul style="list-style-type: none"> • DHPA 	<ul style="list-style-type: none"> • Review of depression features near Virginia Iron Works



Table 11-4: Tier 2 Coordination Meetings With Resource Agencies		
Date & Activity	Attendees (In addition to FHWA and INDOT)	Purpose
5-25-05 Tier 1 Mitigation Meeting	<ul style="list-style-type: none"> DHPA 	<ul style="list-style-type: none"> Discuss implementation of specific provisions in Tier 1 MOA
5-27-05 Section 4 Field Visit	<ul style="list-style-type: none"> DHPA 	<ul style="list-style-type: none"> Visit several above-ground properties to determine eligibility
6-8-05 Water Coordination Meeting	<ul style="list-style-type: none"> IDNR 	<ul style="list-style-type: none"> Discuss hydraulic modeling and calculations within the corridor
6-22-05 Forestry Coordination Meeting	<ul style="list-style-type: none"> IDNR 	<ul style="list-style-type: none"> Discuss impacts for all six sections, with a focus on Section 4 Evaluate economic impacts as a result of forest loss
7-1-05 Coordination Meeting	<ul style="list-style-type: none"> USFWS 	<ul style="list-style-type: none"> Discuss potential re-initiation of Section 7 formal consultation Discuss additional bat mist netting Review proposed mitigation lands Update on water resource impacts and assessments Update on state-listed species
8-4-05 Consulting Party Meeting	<ul style="list-style-type: none"> DHPA 	<ul style="list-style-type: none"> Discuss the National Register of Historic Places (NRHP) eligibility findings presented in the Draft Historic Property Report (HPR)
8-12-05 Conference Call	<ul style="list-style-type: none"> USFWS 	<ul style="list-style-type: none"> Provide update on additional habitat surveys Gave clarification on term “hibernacula”
8-22-05 & 8-23-05 Coordination Meeting	<ul style="list-style-type: none"> USFWS 	<p><u>8-22:</u></p> <ul style="list-style-type: none"> Review and approval of number and locations of maternity circles Discuss fencing under a bridge in Section 3 Discuss potential mitigation site near Patoka River NWR (Section 2) Discuss Community Planning Grant Discuss USDA Forest Service Inventory Analysis Data <p><u>8-23:</u></p> <ul style="list-style-type: none"> Discuss forest analysis methodology Discuss indirect impacts methodology Discuss bridge fencing
9-12-05 Coordination Meeting	<ul style="list-style-type: none"> USFWS 	<ul style="list-style-type: none"> Discuss placing fencing under SR 57 bridge Provide updates or mist netting and radio telemetry surveys
9-23-05 Coordination Meeting	<ul style="list-style-type: none"> USFWS 	<ul style="list-style-type: none"> Provide update on harp trapping and guano surveys Discuss methodologies for forest impacts
9-28-05 Section 4 Field Trip	<ul style="list-style-type: none"> USACE IDEM 	<ul style="list-style-type: none"> Observe wetland areas and stream crossings in Section 4 corridor
10-3-05 Conference Call	<ul style="list-style-type: none"> USFWS 	<ul style="list-style-type: none"> Provide update on bat surveys Discuss methodology for estimating population size in maternity colony
10-7-05 Coordination Meeting	<ul style="list-style-type: none"> USFWS 	<ul style="list-style-type: none"> Provided update on a number of Indiana bat activities Discussed concerns related to Greene/Monroe County Line interchange
10-14-05 Conference Call	<ul style="list-style-type: none"> USFWS 	<ul style="list-style-type: none"> Define cumulative impacts per ESA Gave update on bat surveys



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Table 11-4: Tier 2 Coordination Meetings With Resource Agencies		
Date & Activity	Attendees (In addition to FHWA and INDOT)	Purpose
10-28-05 Section 4 Wetland and Stream Field Review Meeting	<ul style="list-style-type: none"> • USACE • IDEM 	<ul style="list-style-type: none"> • Provided the agencies a field visit to Section 4 water resources
10-28-05 Toll/Schedule Meeting	<ul style="list-style-type: none"> • USEPA Region 5 	<ul style="list-style-type: none"> • Discuss tolling and how it relates to I-69 schedule
11-8-05 Coordination Meeting	<ul style="list-style-type: none"> • IDNR-Division of Fish and Wildlife 	<ul style="list-style-type: none"> • Discuss Threatened and Endangered Species (TES) for each section • Discuss potential wildlife corridors • Discuss permitting and mitigation
11-10-05 Toll/Schedule Meeting	<ul style="list-style-type: none"> • USACE 	<ul style="list-style-type: none"> • Provide update on Tier 2 studies
12-1-05 Coordination Meeting	<ul style="list-style-type: none"> • DHPA 	<ul style="list-style-type: none"> • Discuss Cemetery Position Statement and status of Tier 2 work
12-16-05 Toll/Schedule Meeting	<ul style="list-style-type: none"> • IDEM 	<ul style="list-style-type: none"> • Discuss tolling and how it relates to I-69 schedule
12-16-05 Toll/Schedule Meeting	<ul style="list-style-type: none"> • IDNR 	<ul style="list-style-type: none"> • Discuss tolling and how it relates to I-69 schedule
12-19-05 Section 4 “Streamlining” Meeting #1: Purpose and Need, and Preliminary Alternatives	<ul style="list-style-type: none"> • USEPA Region 5 • IDEM 	<ul style="list-style-type: none"> • Receive agency comments about Section 4’s Statement of Purpose and Need and Preliminary Alternatives Package
1-6-06 Coordination Meeting	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Discuss draft funding agreement between INDOT and USFWS to fund a position at Bloomington Field Office • Provide cave survey updates • Discuss Greene/Monroe County Line interchange
4-12-06 USACE Coordination Meeting	<ul style="list-style-type: none"> • USACE 	<ul style="list-style-type: none"> • Discuss schedule • Identify central contact person at INDOT • Discuss USACE Section 404 permitting procedures • Determine that mitigation and monitoring plans will be submitted with all permit applications • Discuss stream relocation methods, riparian buffers, and legal drains • Discuss mitigation ratios and mitigation within same eight-digit watershed • Discuss use of borrow pits for open water impacts • Discuss jurisdictional determination reports
4-16-06 Coordination Meeting	<ul style="list-style-type: none"> • IDNR 	<ul style="list-style-type: none"> • Discuss permitting, mitigation, karst, oil/gas wells, revegetation species, and wildlife crossings.
5-23-06 Permitting Meeting	<ul style="list-style-type: none"> • IDEM 	<ul style="list-style-type: none"> • Discuss Rule 5 Permits, IDEM’s review period and isolated wetlands • Reviewed mitigation efforts and permitting requirements and timing



Table 11-4: Tier 2 Coordination Meetings With Resource Agencies

Date & Activity	Attendees (In addition to FHWA and INDOT)	Purpose
5-23-06 Coordination Meeting	<ul style="list-style-type: none"> IDNR 	<ul style="list-style-type: none"> Discuss how Tier 1 and Tier 2 could be revised if tolling was an option Review construction in a floodway permitting
7-7-06 Reevaluation Coordination Meeting	<ul style="list-style-type: none"> USEPA Region 5 	<ul style="list-style-type: none"> Discuss how Tier 1 and Tier 2 could be revised if tolling was an option
7-17-06 Reevaluation Coordination Meeting	<ul style="list-style-type: none"> USFWS 	<ul style="list-style-type: none"> Discuss how Tier 1 and Tier 2 could be revised if tolling was an option
8-1-06 & 8-2-06 Interagency Coordination Meeting— All Sections	<ul style="list-style-type: none"> USEPA Region 5 USACE USFWS USDA Forest Service/Hoosier National Forest INDR, Divisions of Water, Fish and Wildlife, Forestry, and Nature Preserves/Heritage Program IDEM Offices of Water Quality, Drinking Water, and Permits 	<p>3rd Tier 2 meeting with agencies and all sections:</p> <p><u>First day:</u></p> <ul style="list-style-type: none"> Review the Tier 1 Re-evaluation and discuss tolling option Provide an update on the progress of each Tier 2 section Give agencies a chance to ask questions/address issues that may have arisen in previous meetings or conference calls, and see how the project management team is addressing these issues <p><u>Second day:</u></p> <ul style="list-style-type: none"> Field trip to see sensitive sites in Sections 4, 5, and 6
8-31-06 Section 4 “Streamlining” Meeting #2: Preliminary Alternatives Analysis and Screening	<ul style="list-style-type: none"> USEPA Region 5 USFWS IDNR 	<ul style="list-style-type: none"> Receive agency comments about Section 4’s Preliminary Alternatives screening package
9-11-06 Forestry Coordination Meeting	<ul style="list-style-type: none"> IDNR 	<ul style="list-style-type: none"> Discuss concerns about impacts to urban forests and mitigation options Discuss eradication of invasive species in right-of-way
10-4-06 Consulting Parties Meeting	<ul style="list-style-type: none"> DHPA 	<ul style="list-style-type: none"> Discuss eligibility and preliminary Identification of Effects Report Provide overview of expanded APE near Greene/Monroe County Line
1-10-07 Conference Call	<ul style="list-style-type: none"> USFWS 	<ul style="list-style-type: none"> Discuss 50 potential mist netting sites
1-17-07 Conference Call	<ul style="list-style-type: none"> IDNR 	<ul style="list-style-type: none"> Discussed level of stream relocations in relation to acquiring a Construction in a Floodway Permit



Section 4—Final Environmental Impact Statement

Date & Activity	Attendees (In addition to FHWA and INDOT)	Purpose
2-9-07 Permitting and Mitigation Meeting	<ul style="list-style-type: none"> • IDEM • USFWS • USEPA Region 5 • USACE • IDNR 	<ul style="list-style-type: none"> • Update on status of permitting progress • Discuss mitigation efforts & focus areas • Discuss water resource impacts in each section • Discuss design level used for I-69 permitting • Discuss mitigation ratios: 2 to 1 forest preservation and 1 to 1 reforestation (Upland Forest); 3 to 1 or 4 to 1 wetland forest; 3 to 1 scrub shrub wetland; 2 to 1 emergent wetland; perennial stream mitigation of 1 to 1 • Ephemeral streams may be mitigated using wetlands or bottomland forest near existing streams • Tracking of mitigation sites and credits
3-1-07 Interagency Coordination Meeting—All Sections	<ul style="list-style-type: none"> • USEPA Region 5 • USFWS • USDA Forest Service/Hoosier National Forest • IDNR, Divisions of Water, Fish and Wildlife, Forestry, and Historic Preservation and Archaeology • IDEM Offices of Land Quality and Ground Water 	<p>4th Tier 2 meeting with agencies and all sections:</p> <ul style="list-style-type: none"> • Review project schedule and update the progress of each Tier 2 section • Review comments received on Section 1’s DEIS • Review water resources, mitigation, and indirect and cumulative impacts • Give agencies a chance to ask questions/address issues that may have arisen in previous meetings or conference calls
3-15-07 Coordination Meeting	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Provide an update on bat surveys • Review of mitigation properties
3-19-07 Conference Call	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Address issues related to coal mining raised at previous meeting
4-16-07 Coordination Meeting	<ul style="list-style-type: none"> • IDNR 	<ul style="list-style-type: none"> • Update on status of all sections • Discuss avoidance and minimization efforts • Discuss compensating mitigation efforts • Discuss coordination from 2-9-07 permitting and mitigation meeting
6-14-07 Non-conformity Meeting	<ul style="list-style-type: none"> • IDEM • USEPA Region 5 	<ul style="list-style-type: none"> • Discuss Greene County Ozone Conformity document
6-26-07 & 6-27-07 Karst Review Meeting	<ul style="list-style-type: none"> • USEPA Region 5 	<ul style="list-style-type: none"> • Discuss karst studies in Sections 4 and 5
8-6-07 Coordination Meeting, Sections 1, 2, and 3	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Discuss mitigation efforts • Respond to question about Tier 2 BA • Discuss cumulative forest impacts in Section 1
11-8-07 Mitigation Field Review	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Reviewed Section 3 proposed mitigation site
12-05-07 Coordination Meeting	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Discuss revised formatting and information to be included in subsequent Tier 2 Biological Assessments
1-25-08 Coordination Meeting	<ul style="list-style-type: none"> • USACE 	<ul style="list-style-type: none"> • Discuss current permit application status • Discuss the permitting approach • Discuss mitigation efforts



Table 11-4: Tier 2 Coordination Meetings With Resource Agencies		
Date & Activity	Attendees (In addition to FHWA and INDOT)	Purpose
4-22-08 Mitigation Field Review	<ul style="list-style-type: none"> • USACE • IDNR 	<ul style="list-style-type: none"> • Reviewed Section's 2 and 3 proposed mitigation sites
7-9-08 Meeting	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Discussed mitigation sites in Sections 1 through 4 • Reviewed information in the Biological Assessments
8-18-08 Mitigation Field Review	<ul style="list-style-type: none"> • USEPA Region 5 	<ul style="list-style-type: none"> • Reviewed Section's 2 and 3 proposed mitigation sites
8-19-08 Interagency Water Resource Team Meeting	<ul style="list-style-type: none"> • IDEM • IDNR • NRCS • USFWS • USEPA Region 5 • USACE 	<ul style="list-style-type: none"> • Discuss advanced mitigation construction on Sections 2 and 3 • Provide updates on long-term management of mitigation sites, permitting, and wetland banking
1-12-09 Meeting	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Discussed several items related to Section 7 Consultation and Tier 2 BA's.
2-12-09 Meeting	<ul style="list-style-type: none"> • IDNR 	<ul style="list-style-type: none"> • Discussed box turtle impacts associated with I-69 and potential ways to minimize these impacts.
3-25-09 Coordination Meeting	<ul style="list-style-type: none"> • DHPA 	<ul style="list-style-type: none"> • Discussed methodology for Age of Data Survey
4-30-09 Interagency Coordination Meeting—All Sections	<ul style="list-style-type: none"> • USACE • IDNR • IDEM • USEPA Region 5 • USFWS 	<ul style="list-style-type: none"> • Discussed revised project schedules for all sections • Discussed DEIS Alternatives and public involvement in Sections 2 and 3 • Discussed Construction progress in Section 1 • Give agencies a chance to ask questions/address issues that may have arisen in previous meetings or conference calls
5-20-09 IDNR Coordination Meeting	<ul style="list-style-type: none"> • Division of Fish and Wildlife • Division of Nature Preserves • Division of Forestry 	<ul style="list-style-type: none"> • Discuss concerns related to potential box turtle impacts • Discussed overall mitigation plans
8-10-09 Mitigation Meeting	<ul style="list-style-type: none"> • IDNR 	<ul style="list-style-type: none"> • Discuss potential IDNR management of mitigation sites for I-69 • Identified two sites as potential sites for long-term IDNR management
10-22-09 Coordination Meeting	<ul style="list-style-type: none"> • IDNR • DHPA 	<ul style="list-style-type: none"> • Discussed AI report for Section 4 aboveground resources
12-7-09 Coordination Meeting	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Addressed a number of items related to Section 7 consultation and the Section 2 BA/BO
12-17-09 Consulting Parties Meeting	<ul style="list-style-type: none"> • DHPA 	<ul style="list-style-type: none"> • Update consulting parties about 2006 HPR and 2007 Determination of Effects Report for Section 4.
2-23-10 Coordination Meeting	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Discuss and confirm bat mist netting sites in Sections 2 and 3 • Provided a summary of Section 4 proposed mitigation sites
4-6-10 Wildlife Crossings Meeting	<ul style="list-style-type: none"> • IDNR 	<ul style="list-style-type: none"> • Summarized the Section 4 proposed wildlife crossings • Discussed proposed eastern box turtle surveys in Sections 2 and 4



Section 4—Final Environmental Impact Statement

Table 11-4: Tier 2 Coordination Meetings With Resource Agencies		
Date & Activity	Attendees (In addition to FHWA and INDOT)	Purpose
5-17-10 Coordination Meeting	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Discuss summer mist netting • Provide updates on Karst Report
5-21-10 Coordination Meeting	<ul style="list-style-type: none"> • IDNR 	<ul style="list-style-type: none"> • Further discussed eastern box turtle survey methodology as well as Section 4 wildlife crossings.
6-22-10 to 6-24-10 Field Review	<ul style="list-style-type: none"> • USACE, USEPA, USFWS, IDEM, IDNR 	<ul style="list-style-type: none"> • Section 4 Mitigation Site Field Review
9-22-10 Coordination Meeting	<ul style="list-style-type: none"> • DHPA 	<ul style="list-style-type: none"> • Discuss Virginia Iron Works and limestone quarries
11-17-10 Coordination Meeting	<ul style="list-style-type: none"> • DHPA 	<ul style="list-style-type: none"> • Discuss recommended Virginia Iron Works and Limestone Quarry discontinuous archaeological districts and adverse effects
11-22-10 Coordination Meeting	<ul style="list-style-type: none"> • USFWS 	<ul style="list-style-type: none"> • Meeting with USFWS to discuss mitigation site easement language
3-21-11 Coordination Meeting	<ul style="list-style-type: none"> • IDEM 	<ul style="list-style-type: none"> • Rule 5 Meeting
3-23-11 Coordination Meeting	<ul style="list-style-type: none"> • IDEM and USACE 	<ul style="list-style-type: none"> • Section 4 Mitigation Concepts



Figure 11-1: Resource Agency and Public Involvement Activities (1 of 2)

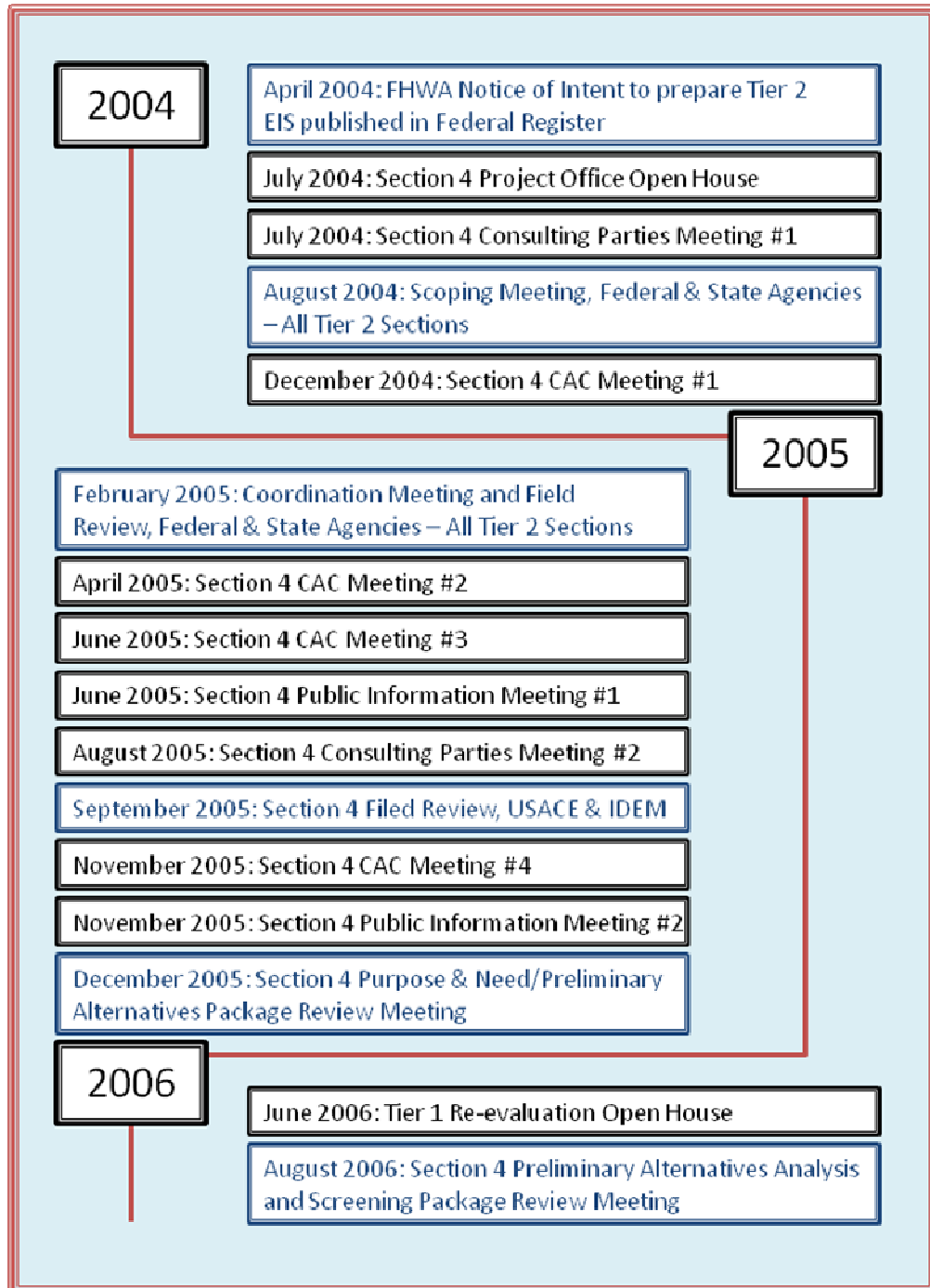




Figure 11-1: Resource Agency and Public Involvement Activities (2 of 2)

