

2 February 2004

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Mr. Grovak:

This letter is written as a comment on the Final Environmental Impact Statement (FEIS) for Tier One of the proposed Interstate 69. I have been working with CARR and Owen County Preservations for the last three years as a volunteer consultant in historic preservation, helping to identify and seek state and federal protection for historic properties that lie within the path of the proposed interstate. As a “consulting party” to the I-69 project, I have attended several meetings sponsored by INDOT and Bernardin, Lochmueller & Associates (BLA) in Indianapolis, and I submitted comments on the DEIS in November 2002 as author of a letter signed by myself and Owen County Preservations president, Bonnie Tinsley.

The following comments on the FEIS concern 1) the FEIS’s distortions of correspondence between myself and the DHPA concerning the **Patoka Bottoms**; and 2) related failures, elsewhere in the FEIS, to acknowledge the existence of historically significant segments of the **Wabash and Erie Canal** lying within the APE.

In addition, I add my voice to those of hundreds of other concerned citizens who have protested that the amount of time the public has been allotted to read and comment on the FEIS has been woefully inadequate. Even given the short amount of time we have had to read the document, it is apparent that the FEIS, despite the decade of research that has gone into its creation, remains surprisingly flawed.

1. **The Patoka Bottoms**

During the summer of 2003, I authored a narrative history of the Patoka Bottoms area which I submitted to the Indiana Division of Historic Preservation and Archaeology in July 2003. Dr. James Cooper, the well-known historian of Indiana’s iron and metal bridges, provided substantial research and input on the narrative, and the report also benefitted from the comments of Duncan Campbell, a professional historic preservation consultant based in Bloomington. The narrative was written as a nomination of the area as a Rural Historic District on the National Register of Historic Places. It was in draft form at the time, and was intended to serve as a guide to the area for the DHPA staff, which at my request, conducted a site visit and evaluation of the proposed district on July 25, 2003. While the DHPA ultimately judged the district *as proposed* to lack “a critical inventory of historic resources,” **the DHPA confirmed that parts of the proposed district are individually eligible and might be combined into a single National Register listing.**

In their follow up letter to me, dated August 27, 2003, **the DHPA stated that the two historic bridges in the Bottoms, the segment of County Road 300W that connects them, as well as the nearby segments of the Wabash and Erie Canal would be considered eligible for listing in the National Register.** While their “reaction to the segment of canal is somewhat more guarded,” they affirm that they have “determined similar segments of canal in Tippecanoe County and Huntington County eligible and so probably would view this segment similarly.” **The FEIS quotes the DHPA’s letter in such a way that it ignores the above comment on the Wabash and Erie Canal; a second quotation of the letter in Appendix N elides the comment on the eligibility of the Wabash and Erie Canal entirely** (See FEIS, Vol. 1, Ch. 5, pp. 113-115; and Vol. 2, Appendix N, p. 113). The final paragraph in the DHPA’s letter as quoted in the FEIS, Vol. 1 reads:

Consequently, we believe that there are resources in Patoka Bottoms, namely the bridges and section of CR 300W, as well as the segment of the Wabash and Erie Canal, that are eligible for listing in the National Register but their significance does not extend to the larger Bottoms area. We do not believe that there are sufficient resources associated with agriculture, settlement, or ethnic history that define a rural historic landscape.

Despite the DHPA’s encouraging comments on the Canal in the paragraph quoted above and elsewhere in their letter, the FEIS deems that since there is no “other extant above-ground resource [of the Wabash and Erie Canal at the Patoka River aqueduct site] the canal segment “is not considered a potentially eligible property” (FEIS, Vol. 1, Chapter 5, p. 115).

It must be pointed out that this judgement on the part of the FEIS flies in the face of the judgement expressed by the DHPA in their letter. While the DHPA did not recommend including the Canal remains in the nomination for the Patoka bridges and the County Road, their letter clearly states that the canal is deemed eligible, and they encouraged us to pursue a separate nomination process for the Canal.

The FEIS provides no basis for its independent judgement of the Canal as ineligible; nor is it clear that BLA has conducted the research necessary to determine whether or not there are extant above-ground portions of the Patoka River aqueduct (for example its piers, guard gates, or abutments).

Furthermore, **the huge earthen embankments that raised the canal above the flood level of the Patoka Bottoms and rendered this section of the canal unique and historically significant are still extant and highly visible to the immediate northeast of the Patoka River aqueduct site, as are the canal prism and towpath.** I personally walked these embankments with the DHPA staff during the site visit on July 25, 2003. Their existence is part of what led the DHPA to judge this segment of the canal potentially eligible for National Register listing.

A final significant omission from my correspondence with the DHPA must be noted here. My narrative of the history of the Patoka Bottoms **raised the possibility of significant archaeological remains to be found along the raised embankments of the canal and at the site of the (now vanished) covered bridge at Dongola.** This possibility caught the attention of my colleague Cheryl Munson, a professional archaeologist at Indiana University. She writes “Short-term occupations provide the best material time capsule of life and times and no other workstation of the 1830s is known to me in southern Indiana” (email communication, 4 August 2003). The DHPA commented that “Unless archaeological investigation reveals significant information from the site of the Dongola covered bridge, we would not consider it to be eligible.” While this comment begs the question of archaeological significance, it also raises its possibility as an issue which should be investigated by professional archaeologists if a conscientious assessment of the area’s archaeological significance is to be made.

2. The Wabash and Erie Canal

Extant traces of the Wabash and Erie Canal, which at times parallels and at times crosses the APE have been downplayed or omitted in other parts of the FEIS.

Though I did not have the time to do an exhaustive survey of all mentions of the Wabash and Erie Canal in the FEIS, the following quotation appears to be typical of the document’s tendency to evade discussion of the canal system as a extant historical resource:

There are some physical remains of the defunct canal system still visible in southwestern Indiana. These include abutments for aqueducts, remains of locks, dilapidated sections of the canal profile, and evidence of water control structures, such as waste gates and guard locks. (FEIS, Vol. 2, Appendix N, p. 30)

What this description of the remains of the canal system omits is all mention of the several extant watered sections of the Wabash and Erie Canal’s Terre Haute to Evansville (Lamsco) sections.. These extant, watered sections need to be addressed as resources that may be adversely effected by the proposed interstate. There is one that is three eighths of a mile long in Gibson County near the town of Francisco (recently the object of the Gibson County Historical Society’s preservation efforts). Another watered section exists between the villages of Willisville and Glezen in Pike County, quite close to the APE. There are likely to be others.

In conclusion, the FEIS has ignored the DHPA’s judgement of the Patoka Bottoms section of the Wabash and Erie Canal as potentially eligible for National Register listing and omits mention of the possibility that the area may have archaeological significance. In a related vein, the FEIS downplays other extant traces of the Canal, and entirely omits mention of its several remaining watered sections.

I have provided a copy of the DHPA letter of August 27, 2003, appended in full to the hard copy of this letter. My efforts to access this letter through the FEIS, which lists it in vol. 2, Appendix P, were unsuccessful. Indeed it appears that all the correspondence

listed in Appendix P is equally inaccessible, including the letter of concurrence sent by the SHPO concerning the four properties of the Patoka Bottoms (mentioned, somewhat confusingly, on FEIS, vol. 1, Ch. 5, p. 115). Absent free access to these letters by readers of the FEIS, it remains unclear which four properties are involved here, who “sent them” to the SHPO, and what is being concurred upon and by whom.

Sincerely,

Edith Sarra, Ph.D.

C: Governor Joe Kernan; Federal Highway Administration; Advisory Council on Historic Preservation; Indiana State Historic Preservation Officer; Frank Hurdis, Chief of Survey and Registration, DHPA; J. Bryan Nicol, INDOT Commissioner; Thomas and Sandra Tokarski, Citizens for Appropriate Rural Roads, John Moore, Environmental Law and Policy Center; Andy Knott, Hoosier Environmental Council, Cheryl and Pat Munson; John Smith, COUNTUS; Senators Borst, Bayh, Lugar