

October 15, 2021

Indianapolis Metropolitan Planning Organization
Attn: Jen Higginbotham
200 E. Washington St., Ste. 2322
Indianapolis, IN 46204



RE: Public Comments on 2050 Metropolitan Transportation Plan

Dear Ms. Higginbotham:

Thank you for the opportunity to provide input on the Indianapolis Metropolitan Planning Organization's (IMPO) draft of the Central Indiana 2050 Metropolitan Transportation Plan (MTP).

As you know, Health by Design works at the intersection of the built environment and public health, collaborating across sectors and disciplines to ensure Indiana communities have neighborhoods, public spaces and transportation infrastructure that promote active living for all. For the past 15 years, we have advocated for equitable, safe, accessible, convenient, and connected options for walking, biking, and public transit; and we have encouraged responsible land use. We believe that the billions of taxpayer dollars represented in this MTP should be invested in the wisest way possible and should yield a balanced transportation network that meets the needs of all Central Indiana Hoosiers, regardless of their age, ability, income, or how they choose to travel.

Below is a summary of the comments, questions and concerns assembled by our team.

1. This planning document is well organized and designed and makes excellent use of graphics, images, and illustrations.
2. We appreciate the variety of ways that local decision-makers, stakeholders, and the broader public have been engaged throughout the planning process.
3. The integration of other planning components – technical reports, the regional activity centers process, scenario planning, etc. – is extremely important, and we look forward to those elements evolving and being used to inform other ongoing and future planning efforts.
4. We suggest the addition of image descriptions, identifying the location and/or activity in each image.
 - a. As an aside, we're very curious about what was happening in the image on page 48!
5. We commend the decision to further adjust the resource allocation goals and increasingly prioritize safety and infrastructure preservation, but ultimately, this MTP continues to perpetuate overinvestment in system expansion.
 - a. Our existing transportation network continues to age, with insufficient resources for current maintenance.
 - i. It is financially prudent to prioritize maintenance costs of existing infrastructure rather than build new roadways that threatens to overburden future taxpayers.
 - b. System deficiencies have become increasingly dire for the safety of all road users, but especially people walking and biking.
6. It's likely a broader conversation than appropriate for this MTP input, but the definition of 'regionally significant' and the parameters by which that concept influences project scoring and funding must be

revisited and, likely, revised in order to better achieve resource allocation goals.

7. The inclusion of the 'Evaluating Budget Allocation' section (p. 15) and graphic is important, and we're glad it's there; but there could be more clarity around what the information means.
 - a. Is the TIP Goal based on the prior LRTP or showing the intent of this MTP?
 - b. It's referencing TIP allocations; how do those relate to the information here in this MTP?
 - i. The relationship between the MTP and TIP isn't discussed until later.
 1. A visual representation of this relationship (and other related items) may be helpful.
 - c. What is represented by the 'Other' category in the graph?
8. In the discussions about Vision Zero (p. 17 and later), it may be worth explaining and using the 'Safe System(s)' terminology for alignment with Federal Highway Administration language.
9. With regard to the Environmental Justice (EJ) section (p. 28-31):
 - a. We appreciate the 'brief note' discussion of language.
 - i. In alignment with that, we suggest the use of a term other than 'disadvantaged' in later discussion (p. 67), as it neglects to account for the historical intended (and unintended) consequences of disinvestment, mismanagement and harm directed at EJ populations.
 - b. This section could also be expanded to discuss the opportunity to better distribute benefits across areas of attention (rather than just minimizing burden).
 - c. With the map on p. 30 (Fig 3-14), how do you explain the apparent lack of investment in areas of attention, given the overarching intent of the Environmental Justice Executive Order.
 - i. Why aren't the Blue and Purple Bus Rapid Transit lines represented here?
10. There is value in providing additional detail about the public engagement process, including the public opinion survey methods and results, given the way some of the findings are discussed and used in the plan.
 - a. How representative were respondents of the region overall and what was their geographic distribution?
11. It's important to include the 'Uncertain Future' (p. 41), but it seems the topics warrant additional discussion and additional examples.
 - a. What data/evidence do we have now on these topics?
 - i. What has been the impact of COVID-19 (beyond the pandemic section itself)?
12. In the Performance Measures section (p. 42-27):
 - a. It may be worth noting that the first page is an overview of more detailed info that follows.
 - b. We propose that the source of data for each performance measure be included, as well.
 - c. How does 1B PM 2 (or a different measure) account for Americans with Disabilities Act (ADA) accessibility and other access/usage barriers related to the sidewalk network?
 - d. Goal 2 measures are likely to shift significantly given the COVID-19 pandemic.
 - i. How will these changes be accounted for?
 - e. How will 3B PM 2 account for accessibility (sidewalks, bikeways, curb ramps, etc.) to transit routes?
 - f. With Goal 6:
 - i. We will further review the federal performance measure tracking, but it would be helpful to clarify if pedestrians and bicyclists struck by cars are accounted for in PMs 1-4.
 - ii. Is it possible to get rate information for pedestrian and bicycle crashes, using data from the Household Travel Survey?
 - iii. Pedestrian and bicyclist crashes should be measured separately.
 - iv. Only accounting for fatalities and serious injuries significantly underrepresents the full negative impact that vehicle crashes – and particularly those involving people walking and

biking – have on lives, livelihoods, economies, and more.

- v. How are scooter crashes counted?
- vi. It would be ideal to show data and trends for ALL performance measures, not just regional ones, in the table on p. 47.

13. On p. 49:

- a. The introductory paragraph about Complete Streets is insufficient in properly defining the concept and describing the range of Complete Streets elements.
 - i. Use of the term ‘residents’ is limiting.

14. We appreciate the robustness of the Congestion Management Process (CMP) section.

- a. Highlighting the intrinsic link between land use policy and transportation is incredibly important.
- b. The table of improvements/strategies is very useful and has valuable information.
- c. Thank you for noting that adding capacity has only short-term benefits, with corresponding significant costs and negative impacts on the environment and quality of life.
 - i. How will IMPO policies and practices disincentivize added capacity moving forward?
- d. The phrase ‘Can create environmental and community impacts’ applies in much of the Access Management section and in the ‘Super Street’ strategy, as well.
- e. Despite all of this valuable content, the concept of congestion itself keeps the focus on motor vehicle travel (comfort, time, level of service, etc.) and prioritizes people driving over those using other modes of travel.
 - i. What could it mean to consider a different measure and model for success?

15. Given discussion throughout the plan about prioritizing preservation/maintenance and multimodal expansion, why does the Recommended Project List (p. 61-65) consist almost entirely of added capacity projects?

- a. It is difficult to understand how most of these projects are considered regionally significant (going back to the definition comment above).

We’ve also identified some needed edits:

- Page 11: Under Carmel-Guilford Road Reconstruction from City Center to Main St (1383180) – Improvements include a center turn **late**, roundabout, storm sewers, curb, sidewalk, and multi-use path.
- Page 13: Second paragraph on the right side – The financial analysis determined that the anticipated 5307 funding amount would increase in future years because the counties began submitting urban trip data to the National Transit Database in 2018, but because Central Indiana was receiving **much** 5311 funding, the 5307 funding increase will not be enough to offset the loss of 5311 funding.
- Page 31: Consistency issue – second paragraph under “National Highway System” heading, first line, MPO should be IMPO.
- Page 34: Fig. 3-20 and 3-21 appear to have duplicated data, though one is supposed to be Marion County’s PCI-rated roadways and the other is PASER-rated roadways for all other counties in the MPA.
- Page 37: Typo in first paragraph of ‘Scenario Planning’ – “The IMPO chose Community Viz, **and** ArcGIS extension.”
- Page 54: Table heading on the y-axis is missing “Occupancy Vehicle” in “Shift Trips from the Single.”
- Page 57: In the first paragraph under “IMPO Projects that Support the CMP” subheading, the paragraph ends without a period and reads as if there’s an unfinished thought.
 - Also, the Town of Cumberland recently adopted a Complete Streets policy.
- Page 57: Typo in paragraph under “Evaluate Strategy Effectiveness” heading – the word “evaluated” on third line shouldn’t be past tense.
- Page 61: Typo in first paragraph under “Recommended Project List” heading – “Committee” on the third line

should be “Committed.”

- Page 63: Typo – Kentucky Ave. misspelled (Project ID 6162, Indy DPW)
- Page 65: Typo – Kentucky Ave. misspelled (Project ID 6168, Indy DPW)
- Page 67: Typo in first paragraph, second column, second line – (aka “gaps) is missing the second quotation mark.

In closing and as always, we appreciate the opportunity to provide public comment. We remain hopeful that there will be meaningful action toward increasing funding for active transportation and in improving roadway safety for people who walk and bike. We look forward to your responses and hope to see this input reflected in the IMPO’s planning and programming processes, decision-making, and implementation. We also remain committed to supporting your efforts in whatever ways are most helpful. Please don’t hesitate to let us know of any questions for us.

Sincerely,

A handwritten signature in cursive script that reads "Kim Irwin".

Kim Irwin, MPH
Executive Director