



August 12, 2022

Indianapolis Metropolitan Planning Organization
200 E. Washington St., Ste. 2322
Indianapolis, IN 46204

RE: Safe Streets and Roads for All Safety Action Plan

Dear Executive Director Gremling:

Thank you for the opportunity to provide feedback on the Safe Streets and Roads for All Safety Action Plan. I am writing on behalf of Health by Design (HbD) and the countless Hoosiers represented by our coalition and partners. As you know, HbD works at the intersection of the built environment and public health. Through our work, we are reminded daily of the resurgence in fatal and incapacitating crashes on our transportation network and the disproportionate impact felt by vulnerable road users and environmental justice populations throughout our region.

We commend Indianapolis Metropolitan Planning Organization (IMPO) staff and Steering Committee members for their decisive action in positioning Central Indiana communities to take full advantage of the new federal discretionary grant funding—especially on an abbreviated timeline. We also appreciate that the Indianapolis Transportation Policy Committee and local public agencies are committing to prioritize safety as a core tenet of project development.

Below is a summary of the comments, questions, and concerns raised by HbD staff upon review of the draft plan, organized by critical themes:

- Engagement and equity
 - Was the public survey administered earlier this summer made available in formats other than digital? If not, will future updates to this plan include more robust public engagement or at least provide multiple avenues for public input?
 - Can the IMPO confirm that persons with disabilities and/or ADA compliance is factored into identification of the agency's environmental justice areas?
 - The Steering Committee did not appear to include any member of the public. In future plan updates, will efforts be made to ensure more diverse and/or public representation? Broadening committee participation provides an outlet for community-based solutions, builds trust between residents and practitioners, and may help raise overall awareness of traffic violence.
 - We are heartened to see equity as a foundational element of this action plan, with special focus on the region's environmental justice populations.

- Policy, process, and safety analysis
 - Please clarify the objective behind the risk factor scores (beginning on p. 32). A clearer explanation of these scores, how to interpret them, why they are important, and how/if they factor into the project scoring criteria would benefit the public.
 - We are incredibly supportive of the scoring criteria that explicitly considers a project's impact to lower greenhouse gas emissions, improve the resilience of our infrastructure, and combat climate change generally.
- Timing and public input
 - HbD understands that the expedited timeline imposed on the IMPO (and others around the country) was not conducive to a robust public engagement process. However, will the IMPO and/or its local public agencies have opportunities in the future to present to their specific communities, particularly in areas where crashes are most prevalent in the region? It is critical that members of the public have adequate time to access the plan, understand its implications on their community, and comprehend often technical and complex language. This comment period was far too short.
- Consistency and correctness (layman's understanding and general readability)
 - Please define KSI.
 - Please define CSAP.
 - Please include Appendix H, as referenced in the plan.
 - On p. 6 in the last sentence of the first paragraph, "Is" should not be capitalized.
 - On p. 66, add period to the end of last sentence in first paragraph.

In closing, we appreciate the opportunity to review the plan and provide feedback and public comment. We are hopeful that this plan is only the first step in galvanizing decision-makers to rethink Central Indiana's transportation system. Safety is not a new concern, but the problem must be met with greater urgency. HbD remains committed to supporting your efforts in whatever ways are most helpful. Please do not hesitate to let us know of any questions for us; we look forward to your response.

Sincerely,



Kim Irwin
Executive Director, Health by Design