

May 25, 2021
Indiana Department of Transportation
100 North Senate Avenue, Room N758
Indianapolis, IN 46204



RE: Public Comments on Draft Statewide Transportation Improvement Plan 2022-2026

Good evening, Mr. McNeil,

Thank you for the opportunity to provide input on the Indiana Department of Transportation (INDOT) Statewide Improvement Program (STIP) Draft for 2022-2026. I am writing on behalf of Health by Design and the countless Hoosiers represented by our coalition and partners. For more than a decade, we have taken our responsibility to provide input on 3 STIP drafts very seriously, submitting comments on the past six versions. Unfortunately, some of the issues we first raised back in 2009 remain just as concerning today.

For reference, Health by Design is a coalition of diverse partners working throughout Indiana, at the intersection of the built environment and public health, with a goal of increasing equitable, safe, accessible, convenient and connected options for walking, biking and public transit. We believe that the billions of taxpayer dollars this STIP represents should be invested in the wisest way possible and should yield a balanced transportation network that meets the needs of all Hoosiers, regardless of their age, ability, income, or how they choose to travel.

Below are the questions, concerns and comments assembled by our team this year:

- Consistent with our past input, this STIP continues to represent a significant imbalance in modal investment, with too much funding going into system expansion and roadway projects and a tiny fraction being used for active transportation modes. Furthermore, because of the way the projects are documented and tracked, it's impossible to account for the elements that might improve safety and access for people walking, biking and/or using a mobility device. The STIP should provide additional project details, so that the public can see if/when multimodal elements are being incorporated.
- The STIP references both the long-range transportation plan and the five-year construction plan, but does not make direct connections between the actual content of the various documents.
 - The construction plan still does not appear to be publicly available.
 - How do we access a copy of this plan?
 - Why isn't it an appendix to the STIP or clearly linked?
- The 2016 Strategic Highway Safety Plan is referenced in the STIP.
 - Given that the SHSP is slated to be updated this year, how will that be reflected and updated in the STIP?
- Complete Streets – as a policy or concept – is still not mentioned or referenced throughout the document.
 - How is INDOT's policy applied to the projects represented in the STIP?
- The term equity is not mentioned at all and accessibility is only referenced as it relates to accommodations for public participation. The section on Environmental Justice includes

outdated template language that we have commented on each year since at least 2013. In past years, INDOT staff has indicated that updates to trainings, data, research, etc., have occurred, but once again, the outdated information is included here.

- We do not understand the targets listed, nor the methods used, with regard to safety performance measures.
 - Why would the target number of fatalities or serious injuries ever go up?
 - There appears to be a potential manipulation of the data to meet goals, by making adjustments to targets midcourse.
- It would be helpful to have additional explanation of the five core principles of Asset Management.
- Which of the four Asset Management Teams is responsible for multimodal integration, equitably considering the needs of pedestrians, bicyclists, transit riders, rail passengers, people with disabilities, etc.?
- Why does the District Area/LPA/MPO/Early Consultation Meeting Process call for only one meeting per district?
 - How is the public engaged in this process?
- Section 164 penalties are referenced in the apportionments table, but nowhere in the STIP does it explain what those penalties are.
 - What are those?
- As we've noted in the past, the public comment period should begin following the last public open house, giving those who attend it ample time for review and to provide meaningful comments.

We've also found a few needed edits:

- Table 5 has a typo in the table label: Perormance = Performance
- Text on page 12 has a typo in eighth bullet point (referring to Next Level Indiana): as = also
- Text on page 18 had a typo: second paragraph, "...over the course of the next four fiscal years to the following..."
- Table on page 18 has a typo: Perfromassnce = Perfromancem, Freght = Freight 4

In closing and as always, we appreciate the opportunity to provide public comment. We continue to do so in good faith and with the reasonable expectation, despite little evidence, that our input and contributions are taken seriously and used in improvement of INDOT's planning and programming processes and decision-making. We look forward to your responses and seeing if and how this input is reflected in the final document. Please let us know of any questions for us.

Take care,

Kim

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