

March 16, 2022

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



RE: Draft CEDS Public Comment

Dear Ms. Scovel:

Thank you for the opportunity to provide input on the Indianapolis Metropolitan Planning Organization's (IMPO) draft of the Comprehensive Economic Development Strategy (CEDS). I am writing on behalf of Health by Design and the countless Hoosiers represented by our coalition and partners. For reference, Health by Design is a coalition of diverse partners working to ensure that communities across Indiana have neighborhoods, public spaces, and transportation infrastructure that promote physical activity and healthy living.

For more than a decade, Health by Design has provided input and maintained a cooperative working relationship with the IMPO. We will continue to do so in support of a healthier and more equitable Central Indiana.

Below is a summary of the comments assembled by our team. We are invested in contributing meaningful review and comments that reflect and support healthy, equitable communities that are accessible by all and provide folks without cars multiple ways to live and move through the public realm. This is indeed a right for all, not a privilege.

We hereby submit the following questions, concerns, and or comments for your consideration:

Specific:

- P. 13: *"About 13 percent of households in Marion and Madison Counties do not have computer access, a percentage that is higher than state (11.3 percent) and national (9.7 percent) levels, but this challenge is not shared by their regional peers."*
 - Who are the regional peers? Is this simply referring to the region's neighboring counties, or was some analysis done on peer regions outside Indiana?
- P. 18: SWOT analysis—there are a few concerning topics that appear to be missing but we thought should be noted.
 - The region's persistent low health indicators/health disparities present an ongoing threat to the regional economy. For example, according to [County Health Rankings](#), Madison and Marion counties rank among the lowest in health outcomes (79th and 83rd, respectively) and health factors (71st and 92nd, respectively), while the region's other counties rank among the ten best (except Morgan, which is average). This disparity, among others noted in the CEDS, is yet another example of the vast differences that exist between communities within the region.
 - Likewise, was their consideration in noting partisan politics as a threat to the regional economy? It seems policy solutions at the local level are increasingly rebuffed by state officials on several issues relevant to the proposed goals and strategies contained in the CEDS.

- Additionally, Indiana’s chronically low voter participation rate (especially in primary and local elections) could be identified as a weakness or a threat. How can local governments and/or the business community partner to improve voter turnout, increase public participation, and enhance civic infrastructure?
- Goal 2 Innovation section case study on esports sector development—this recent IBJ [article](#) and [editorial](#) may be informational in the context of Indianapolis/Central Indiana.
- Goal 3.1 *Create vibrant and inclusive communities that support businesses and promote amenities for residents and visitors.*
 - 3.1.1 (10-min. Walk to Parks)—this is a great starting point, but we would stress the importance of walkability to all daily destinations to the greatest extent possible, including siting of schools, grocery stores, clinics, libraries, etc. Because walkability is essential in creating vibrancy and inclusiveness, other public services and goods need to also be figured into the equation. This may be adequately covered with some wordsmithing or cross-referencing to 3.2.2 (IMPO Regional Activity Centers).
 - 3.1.4 (Complete Streets) is critical and we are glad to see this included among the other strategies. However, adopting complete streets *practices* is merely a baseline—we would push for the adoption of complete streets **policies** that establish design guidelines and metrics that meet the needs of individual communities throughout the region. This ensures right-of-way investments are truly inclusive, meeting specific requirements to accommodate all modes of transportation—not just that they were considered.
- Goal 3.4 *Enhance transportation options, including non-motorized routes and shared mobility services, for residents to access better employment opportunities across the entire region.*
 - All strategies in this section are great; however, there should also be language that notes the importance of an integrated regional multimodal system. In other words, trails/greenways should connect people to rapid transit stations, bikeshare stations should be sited near bus stops, etc. This also reinforces the resiliency guiding principle and can cross-reference with Goal 3.6—by building redundancies into our transportation system, we allow residents to efficiently shift modes due to external factors.
- P. 38: Environment Roundtable Participants
 - Taylor Firestone of Health by Design attended the June 9, 2021, Roundtable.

General:

- We fully support the four guiding principles identified by the steering committee, especially “equitable growth.” It appears that, at least broadly, equity was considered in all areas of the CEDS. We look forward to seeing (and supporting) specific strategies and metrics for improving equitable outcomes for all Central Indiana residents as related plans and projects sprout from the CEDS.
- Relatedly, we noted rather passive, vague language like “support,” “continue to support,” “build on,” “explore,” etc. This is perhaps due to the parameters of the CEDS and acknowledgement that the Evaluation Framework is dynamic and will continue to be built over time, but we would

like to see more intentional language aligned with performance measures to ensure progress is delivered. Health by Design stands willing and able to assist with developing metrics or “indicators of progress,” as needed, especially in relation to Goal 3.

- We would suggest reviewing the [Elements of a Healthy Community](#) wheel developed by Vitalyst Health Foundation in relation to this CEDS and all future projects. We are heartened that most elements were at least touched upon in the CEDS document; however, the graphic may help bolster areas of the CEDS that are lacking (notably, public health).
- Are there any plans for targeted legislative advocacy or partnerships to advance the goals outlined in the CEDS?
- We applaud the IMPO for the great deal of coordination among the dozens of individuals, stakeholders, and organizations across the eight-county region; however, public health professionals appear to have had limited representation in this process.

Thank you again for the opportunity to provide this review and feedback. We recognize the importance of completing a regional CEDS and are excited for the possibilities it represents in continuing to build a more equitable, healthy, and resilient Central Indiana. 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